

PE04-078
FORD
1/28/2005
BOOK 3 OF 12
ATTACHMENT F
PART 4 OF 6

RECEIVED NOV - 3 2004



FARMERS

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10/21/2004

Shawn Norton
Ford Motor Co.
P.O. Box 6248 - Mid 3rd B
Dearborn, MI 48126

FORD MOTOR COMPANY
RECEIVED
OCT 27 2004
OFFICE OF THE
GENERAL COUNSEL

CUSTOMER
RELATIONSHIP
CENTER
2004 OCT 26 P 12:48

Re: Our Insured: [REDACTED]
Loss Date: 07/29/2004
Claim Number: [REDACTED]
Total Amount Owed: \$22,554.81

Dear Ms. Norton:

We previously advised you of our subrogation rights in regards to the above-noted claim. Enclosed herewith is our Cause and Origin Report with color photographs. If you need any additional information please do not hesitate to contact me.

Your prompt response will be greatly appreciated.

Sincerely,
Mid-Century Insurance Company of Texas

Scott Sheffield

Scott Sheffield
Special Subrogation Representative
512-238-5739

*VCC
BWD 7/4/05*

*- NO VRAE
- Houston, TX
- copy
- photos
- Fry/POC. Rpt*



The ProNet Group, Inc.

9470 Gray Falk Drive
Suite 280
Houston, Texas 77077-6996
281-896-2865 (phone)
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800-216-7208 (toll free)
pronet1@flink.net (email)
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REPORT OF FINDINGS

Claim No: 100 525 1781-1-2

Date of Loss: 07/29/04

VEHICLE FIRE EVALUATION

INSURED: JESUS GARZA

2001 FORD F150 LARIAT

Prepared for:

**FARMERS INSURANCE GROUP
480 NORTH SAM HOUSTON PARKWAY EAST
SUITE 320
HOUSTON, TEXAS 77060**

Ron C. Boutwell, ASE
Consultant

Randy Cullison, ASE, CFEL, CVFI
Project Manager

August 24, 2004

ProNet File No. 7525

FEB4-878 C 8787

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I. INTRODUCTION

On July 29, 2004, a fire occurred involving a Ford vehicle. On August 10, 2004, The ProNet Group, Inc., was retained by Mr. Chris Novotny of Farmers Insurance Group to inspect the vehicle and determine the origin and cause of the fire.

On August 16, 2004, The ProNet Group inspected the vehicle at Insurance Auto Auction, located at 2535 West Mount Houston in Houston, Texas. During this visit, the vehicle was inspected and photographs were taken to document our observations. The observations described and pictured in this report are representative of the conditions observed during our visit. This report will not reflect all conditions of the vehicle, but will demonstrate typical conditions observed. All photographs are available for review.

The cruise control deactivation switch electrical connector was collected during this inspection and is currently stored by ProNet.

II. BASIS OF REPORT

This report is based on the following:

1. Inspection of the vehicle.
2. Research of the National Highway Traffic Safety Administration (NHTSA) records to identify any preliminary evaluations, engineering analyses, or recalls on 2001 Ford F150 Lariat trucks.

3. Review of the fire report (see Attachment A).
4. Information and observations as noted in this report.

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.

III. CONCLUSION

Based on our findings and observations as noted in this report, it is our opinion the 2001 Ford F150 Lariat truck fire originated in the left rear-third section of the engine compartment and was caused by a resistant short within the brake pressure switch (cruise control deactivation switch) located on the top face of the brake master cylinder.

V. DISCUSSION

VEHICLE DESCRIPTION

The vehicle was identified as a white four-door 2001 Ford F150 Lariat truck bearing Vehicle Identification No. 1FTRW08LX1 [REDACTED] and IAA stock No. 861186.

EXTERIOR INSPECTION

Our inspection of the truck exterior revealed:

1. All combustible materials on the front face of the truck were consumed.

2. The right and left front fenders were void of paint.
3. The left front tire was consumed and the inboard side of the wheel had melted. The right front tire was partially consumed.
4. The windshield, left side door glasses, right front door glass and center glass for the back glass had shattered.
5. The hood was consumed.
6. The right front door panel below the side view mirror was void of paint. The leading edge of the left front door panel was void of paint.
7. The right outside mirror was slightly burned and the left outside mirror was consumed.
8. The exterior exhibited a burn pattern consistent with a fire that originated in the passenger compartment left of the truck's centerline.

PASSENGER COMPARTMENT

Our inspection of the passenger compartment:

1. All interior components were covered with a mild layer of soot.
2. The headliner was severely burned.
3. The rear bench seat back covering was consumed exposing the padding underneath. The left half of the left front seat back was consumed

exposing the steel skeleton.

4. The rear door trim panels were melted. The upper third section of the right front door trim panel was consumed while the upper half of the left front door panel was consumed.
5. The dash was consumed in a progressive pattern. Specifically, the left half of the dash evidenced more burn than the right half of the dash.
6. Aftermarket stereo equipment was located under the rear bench seat. The components did not have any evidence of electrical short-circuiting that would have caused the fire.
7. The burn patterns observed in the passenger compartment are consistent with a fire that propagated from the engine compartment into the passenger compartment after consuming the firewall (bulkhead) access hole seals left of the truck's centerline.

ENGINE COMPARTMENT

Our inspection of the engine compartment revealed an intense lower to upper level burn, which was more intense in the left rear quadrant of the engine compartment. Specifically:

1. The air conditioner hoses were consumed.
2. The battery was consumed. The positive battery cable end evidenced an aftermarket heavy gauge electrical wire. This wire routed through the firewall near floor-pan level approximately six inches (6") above the right frame rail then into the passenger compartment. The wire was void of

Insulation from the battery cable end to approximately five inches (5") on the passenger side of the firewall. Subsequent to removing the carpeting to better access this wire and its route, there was no evidence of electrical short-circuiting or electrical over heating observed that suggests this wire caused the fire. The wire routed to the aftermarket stereo component under the rear bench seat.

3. The radiator and condenser cores were consumed.
4. The electrical wiring harness that routed across the firewall from the right corner to the left corner of the firewall was completely void of its protective conduit and the wires were void of insulation and consumed in areas adjacent to the right valve cover. These wires did not exhibit fusing of the wire strands that suggests an electrical short circuit occurred causing the fire.
5. The right valve cover evidenced exterior surface burn while the left valve cover was partially consumed exposing the camshaft underneath.
6. The right timing chain cover was basically intact while the left timing chain cover was slightly melted.
7. The power steering fluid reservoir was consumed.
8. The air intake tube and the air filter housing were consumed.
9. The under-hood power distribution center was burned. However, a greater intensity in burn was noted on the right face of the distribution center.

10. The brake booster secured to the firewall in the left rear corner of the compartment had exterior surface burn. The brake master cylinder was consumed.
11. The cruise control servo located forward of the distribution center was basically consumed leaving only the steel components servo.
12. The ABS electro hydraulic control unit located on the top face of the left frame rail below the power distribution center had evidence of intense burn.
13. The electrical connector for the cruise control deactivation switch was located on the left lower control arm. The connector was heavily charred and had separated from its electrical wiring. The connector appears to have burned from the inside out. The connector was taken into evidence.

RECALLS

We searched the National Highway Traffic Safety Administration (NHTSA) database to identify any preliminary evaluations, engineering analyses, or recalls on 2001 Ford F150 vehicles relating to electrical fires involving cruise control deactivation switches.

A search of their records, as well as technical service bulletins, did not indicate any problems relating to cruise control deactivation switch failures resulting in engine compartment fires within 2001 Ford F150 vehicles at this time.

However, a search of their records did reveal ODI Action No. EA02-025. This ODI is an engineering analysis investigation involving the cruise control deactivation switch failures that result in fires. While the 2001 Ford F150 was not a listed vehicle in this

Investigation, it should be noted that the switch is virtually identical to the ones used in the vehicle in question.

FIRE REPORT

On August 23, 2004, we obtained the fire report from Harris County Fire Marshal's Office, which states the following:

On 7-29-04 at 00:53 hours, investigators Farris and Langenberg received a request for a fire investigation from Channelview fire department. Investigators arrived at 686 Bright Penny Lane and met with Channelview engine 32. Investigators observed a pick-up truck parked in the street in burned condition. After examining the evidence and speaking to witnesses, this fire will be ruled accidental.

SUMMARY

In summary, this 2001 Ford truck fire originated in the left rear quadrant of the engine compartment, specifically in the area of the brake master cylinder, as evidenced by the burn patterns. The only significant electrical component in the area of most intense burn is the cruise control deactivation switch located on the top face of the master cylinder. There was no other evidence that suggests a failure occurred with any other component, OEM or aftermarket, which would have caused this fire.

In regards to cruise control deactivation switch failures, it is known and documented that these switches have failed and subsequently caused fires.

RECOMMENDATIONS

We recommend that the 2001 Ford F150 Lariat truck 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 truck by any other concerned parties.

V. ATTACHMENTS

A. FIRE REPORT

PUBLIC RELEASE REPORT FOR HARRIS COUNTY
LAW ENFORCEMENT

CASE NO: 040;
FIRE MARSHAL
CHANNELVIEW FD

Type of Offense: ARSON INHABITED MOTOR VEHICLES

Location: [REDACTED] GRID: 497D 0

At/between Date/Time Date/Time
AT 07/29/04 00:34

Premises Involved: STREET Weather Condition: NIGHT
Cause of Fire : ELECTRICAL DISTR, Method of Entry:

Complainant Information:

NAME	AGE	RACE	SEX	HISP
C01 [REDACTED]	46	W	M	Y
C02 [REDACTED]	25	W	M	Y

NAME OF INVESTIGATING OFFICER: FARRIS D

PROPERTY INVOLVED:	MAKE	MODEL	YEAR	TYPE	VALUE/LOSS
BRAND	TYPE/DESCRIPTION	CODE	TYPE		

VEHICLE INVOLVED:	MAKE	MODEL	YR	STYLE	WCO	LTC	LIS	LIT	VALUE/LOSS
FORD (D) DAMAGED	01	PK	WHI/	58VWZ	JTX	PC			22000

Synopsis of Offense:

ON 7-29-04 AT 00:53 HOURS, INVESTIGATORS FARRIS AND LANGENBERG RECEIVED A REQUEST FOR A FIRE INVESTIGATION FROM CHANNELVIEW FIRE DEPARTMENT. INVESTIGATORS ARRIVED AT [REDACTED] AND MET WITH CHANNELVIEW ENGINE 32. INVESTIGATORS OBSERVED A PICKUP TRUCK PARKED IN THE STREET IN BURNED CONDITION. AFTER EXAMINING THE EVIDENCE AND SPEAKING TO WITNESSES THIS FIRE WILL BE RULED ACCIDENTAL.

DETAIL REPORT FOR HARRIS COUNTY
LAW ENFORCEMENT

CASE NO: 0407290107
Date: 07/29/04 Time: 22:43
Page: 1

Type of Offense: ARSON INHABITED MOTOR VEHICLES

Dispatch Location 671 BRIGHT PENNY LN
All Grid 497D Beat S30 District 33 COMM A1

Reported Location
All Grid 497D Beat FCV District A1 COMM A1

At/Between AT Date/Time 07/29/04 00:34 Date/Time

Premises Involved: STREET Method of Entry
Point of Entry Point of Exit
Inst/Tool Used Weather Condition: NIGHT
Cause of Fire: ELECTRICAL DISTB Latent Prints: N Scene Photos: Y

Persons Involved Information:
Ty/No Name/Address Rel to Offender AGE RACE SEX HISP
C01 [REDACTED] [REDACTED] 46 W M Y

HOUSTON TX [REDACTED]
Date of Birth: [REDACTED] Social Security No: [REDACTED]
Drivers License: [REDACTED] State: TX
Condition: Taken To: Transported by:
Employment:
Phone: - - ext:

C02 [REDACTED] 25 W M Y
HOUSTON TX [REDACTED]

Date of Birth: [REDACTED] Social Security No: [REDACTED]
Drivers License: [REDACTED] State: TX
Condition: Taken To: Transported by:
Employment:
Phone: - - ext:

R01 [REDACTED] [REDACTED]

Date of Birth: / / Social Security No: - -
Drivers License: [REDACTED] State:
Condition: Taken To: Transported by:
Employment:
Phone: - - ext:

DETAIL REPORT FOR HARRIS COUNTY
LAW ENFORCEMENT

Case No: [REDACTED]
Date: 7/29/04 Time: 22:43
Page: 2

Persons Involved Information:
TY/No Name/Address

Rel to Offender

AGE RACE SEX HISP
W M Y

W01

HOUSTON TX [REDACTED]

Date of Birth: / / Social Security No: [REDACTED]
Drivers License: State: [REDACTED]
Condition: Taken To: Transported by:
Employment:

Phone: - - ext:

W F Y

W02

HOUSTON TX [REDACTED]

Date of Birth: / / Social Security No: [REDACTED]
Drivers License: State: [REDACTED]
Condition: Taken To: Transported by:
Employment:

Phone: - - ext:

Officers Involved:

P Name
P FARRIS D
B LANGENBERG D
B CALLAWAY, KEN

TDISP	TENRT	TARRD	TCLRD	DIS	CBY
00:59	00:59	01:23	02:09	REP	950
00:59	00:59	02:27	02:09	CBU	950
00:59	00:59	01:59	02:08	CBU	950

Status / Disposition

Name
FARRIS D
FARRIS D
FARRIS D

Report Status: APP Date: 07/29/04
BCR Clearance: EXC

Initial Entry
Report Approval
Case Approval

Related Cases

Property Involved:
Per/NO Item St Brand Type NIC Number Serial Number Value/
Loss

Vehicle Involved:
Per/NO Status Make Model Lit VCO LIC LIS Value/
Loss

C01 D FORD PK WHI/ 5BVM78 TX 22000

VIN/SERIAL NUMBER : 1FTRM08LX1K [REDACTED]
ARSON PROPERTY CLASS: N

Synopsis of Offense:

ON 7-29-04 AT 00:53 HOURS INVESTIGATORS FARRIS AND LANGENBERG RECEIVED A
REQUEST FOR A FIRE INVESTIGATION FROM CHANNELVIEW FIRE DEPARTMENT.
INVESTIGATORS ARRIVED AT [REDACTED] AND MET WITH CHANNELVIEW
ENGINE 32. INVESTIGATORS OBSERVED A PICKUP TRUCK PARKED IN THE STREET IN
BURNED CONDITION. AFTER EXAMINING THE EVIDENCE AND SPEAKING TO WITNESSES
THIS FIRE WILL BE RULED ACCIDENTAL.

Suspects Involved:

Narrative:
ENTERED BY:

Date: 07/29/04 Time: 21:58

ASSIGNMENT

ON 7-27-04 AT 00:55 HOURS INVESTIGATORS FARRIS AND LANGENBERG RECEIVED A REQUEST FOR A FIRE INVESTIGATION FROM CHANNELVIEW FIRE DEPARTMENT AT 671 BRIGHT PENNY LANE. INVESTIGATORS ARRIVED AT 01:30 HOURS AND MET WITH CHANNELVIEW FIRE DEPARTMENT ENGINE 32.

SCENE SUMMARY

THE SCENE IS LOCATED IN THE CHANNELWOOD SUBDIVISION OF UNINCORPORATED HARRIS COUNTY. THE VEHICLE WAS PARKED FACING NORTH ON THE EAST SIDE OF A BLACKTOP, RESIDENTIAL ROADWAY. THE VEHICLE WAS PARKED TO THE NORTH OF THE DRIVEWAY OF THE RESIDENCE LOCATED AT [REDACTED] THIS IS THE LISTED ADDRESS OF THE VEHICLE'S OWNER. THE SCENE WAS ILLUMINATED BY THE HEADLIGHTS AND HANDHELD LIGHTS OF INVESTIGATORS. THE ONLY OTHER ILLUMINATION WAS PROVIDED BY SEVERAL OUTSIDE GARAGE LIGHTS FROM NEARBY RESIDENCES.

FIRE DAMAGE

THE VEHICLE SUSTAINED FLAME AND HEAT DAMAGE TO THE ENTIRE ENGINE COMPARTMENT EXTENDING INTO THE PASSENGER COMPARTMENT. THE INTERIOR PASSENGER COMPARTMENT SUSTAINED HEAT AND FLAME DAMAGE TO THE COMBUSTIBLE MATERIALS INSIDE WITH MOSTLY METAL COMPONENTS REMAINING. THE DRIVERS SIDE FRONT TIRE WAS BURNED AWAY COMPLETELY. THE PASSENGER SIDE FRONT TIRE WAS BURNED APPROXIMATELY HALF WAY. THE REMAINING VEHICLE FROM THE REAR PASSENGER DOORS TO THE REAR BUMPER WAS INTACT.

AREA OF ORIGIN AND CAUSE

DUE TO WITNESS STATEMENTS FROM THE ON SCENE FIRE DEPARTMENT CREWS AND THE BURN PATTERNS TO THE VEHICLE THE FIRE MOST LIKELY ORIGINATED IN THE ENGINE COMPARTMENT IN THE AREA OF THE DRIVERS FRONT SIDE OVER THE FRONT TIRE. THE CAUSE OF THIS FIRE WILL MOST LIKELY HAVE BEEN CAUSED BY A FAILURE IN THE ELECTRICAL DISTRIBUTION SYSTEM OF THE VEHICLE.

EVIDENCE

A SERIES OF DIGITAL PICTURES THAT SHOW A TRUE REPRESENTATION OF THE SCENE WERE DEVELOPED BY INVESTIGATOR LANGENBERG WITH A SONY MVC-CD500 DIGITAL CAMERA. THESE PHOTOGRAPHS WERE DOWNLOADED TO A READ ONLY CD AND WILL BE INCLUDED IN THE CASE FILE.
A PLAT OF THE SCENE WAS DEVELOPED AND WILL BE INCLUDED IN THE CASE FILE.

INTERVIEWS AND WITNESSES

INVESTIGATORS SPOKE TO [REDACTED] (C02) AND HE STATED THAT HE HAD DRIVEN THE VEHICLE HOME FROM HIS JOB AT APPROXIMATELY 18:10 HOURS AND PARKED IT ON THE STREET OUT FRONT OF HIS RESIDENCE. AT APPROXIMATELY 00:35 HOURS HE RECEIVED A TELEPHONE CALL FROM HIS NEIGHBOR [REDACTED] (W01) SAYING THAT HIS TRUCK WAS ON FIRE.
INVESTIGATORS SPOKE TO (W01) AND HE STATED THAT HE HEARD A LOUD POP THAT

Narrative:

ENTERED BY:

Date: 07/29/04 Time: 21:58

Woke him up. He then looked out and saw a red glow in the street from in the street and he then contacted the fire department. At this time he then called his neighbor and then went outside. At this time he noticed another neighbor outside as well and then the fire department showed up. Investigators spoke to [REDACTED] (W02) who stated that she heard the same loud pop and then called 911. She was told that they already had a call for a fire at that address. She then went outside and watched the fire department arrive. Investigator spoke to the captain of engine 32 and he stated that the first arriving booster truck (booster 42) made the location and had mechanical problems with the pump on the truck and could not put the fire out. At this time engine 32 arrived and they got the fire out. The crew of booster 42 advised the other firefighter that on their arrival the fire was contained to the engine compartment only.

EXPOSURES

NO EXPOSURES WERE DAMAGED IN THIS FIRE.

INJURIES / FATALITIES

NO INJURIES WERE SUSTAINED IN THIS FIRE.

INSURANCE / LIEN

THE VEHICLE IS INSURED BY FARMERS INSURANCE COMPANY.
POLICY NUMBER: [REDACTED]

SUMMARY

AFTER OBSERVING THE BURN PATTERNS, INTERVIEWING THE FIRE DEPARTMENT AND OTHER WITNESSES THIS FIRE WILL MOST PROBABLY BE AN ACCIDENTAL FIRE THAT ORIGINATED IN THE ENGINE COMPARTMENT. THIS FIRE WAS MOST PROBABLY CAUSED BY A FAILURE IN THE ELECTRICAL DISTRIBUTION SYSTEM. THIS WILL BE CLOSED OUT ACCIDENTAL.

V. ATTACHMENTS

B. PHOTOGRAPHS

PBA-078 C 8724

1. View showing the front of the 2001 Ford F150 Lariat truck.



2. Rear view of the truck.



PC04-070 C 0720

3. Right side view of the truck.



4. Left side view of the truck.

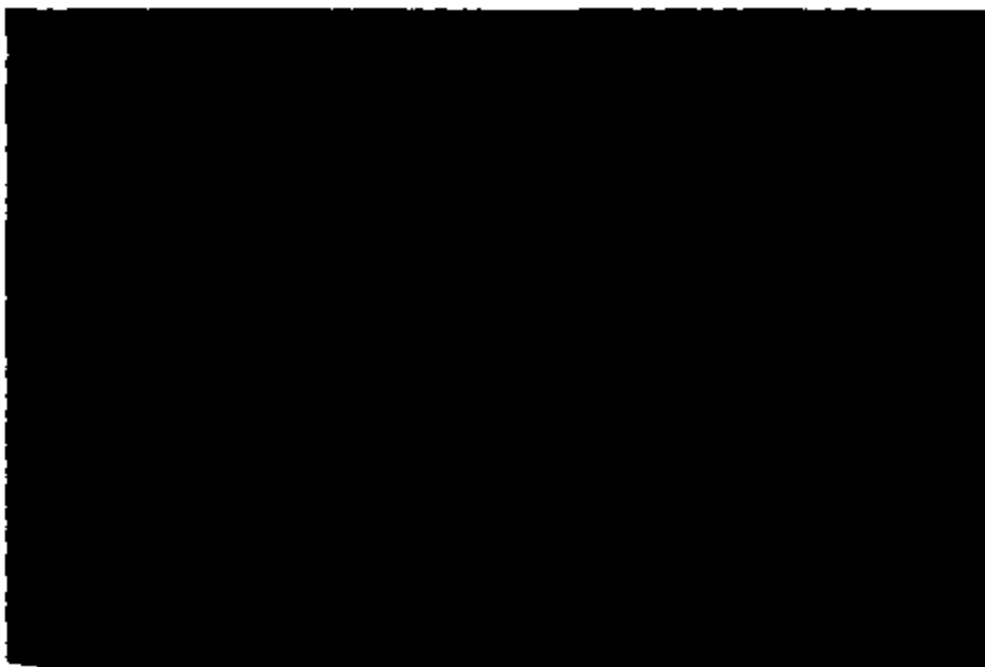


PE04-878 C 8725

5. View showing the left front fender.

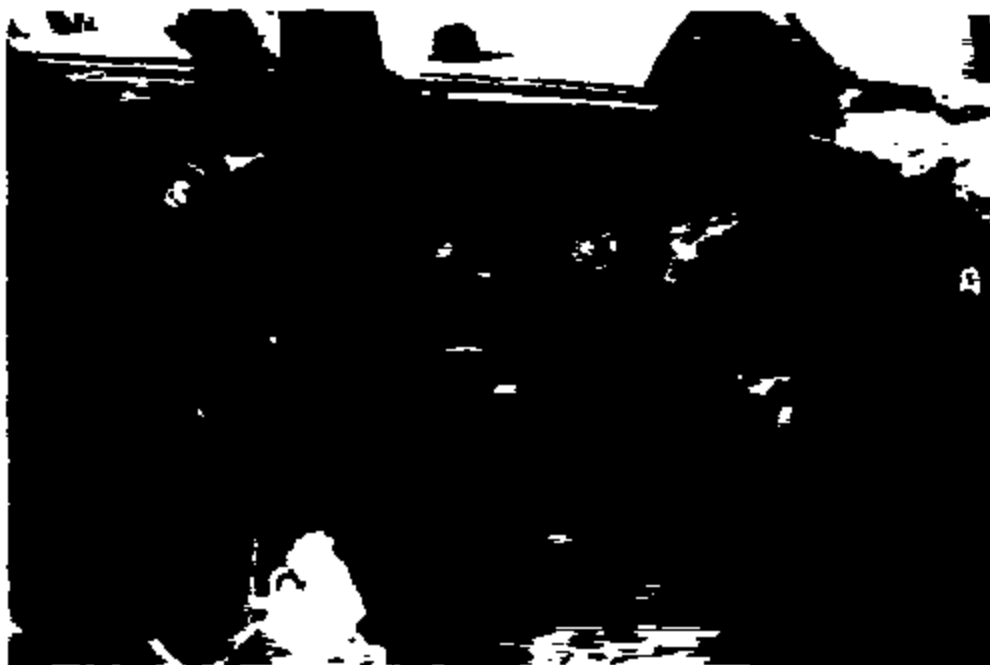


6. View of the vehicle stock number.



PEBA-878 C 8727

7. Right to left view of the front passenger area.



8. Left to right view of the rear passenger area.



PC99-070 C 0720

9. Left to right view of the front passenger area.



10. View showing the right third of the dash.



PE04-078 C 0728

11. View showing the center third of the dash.



12. View showing the left third of the dash.



PC34-878 C 8738

13. View showing the aftermarket stereo equipment.



14. View showing the stereo radio remains.



PE04-070 C 0731

15. Overview of the engine compartment.

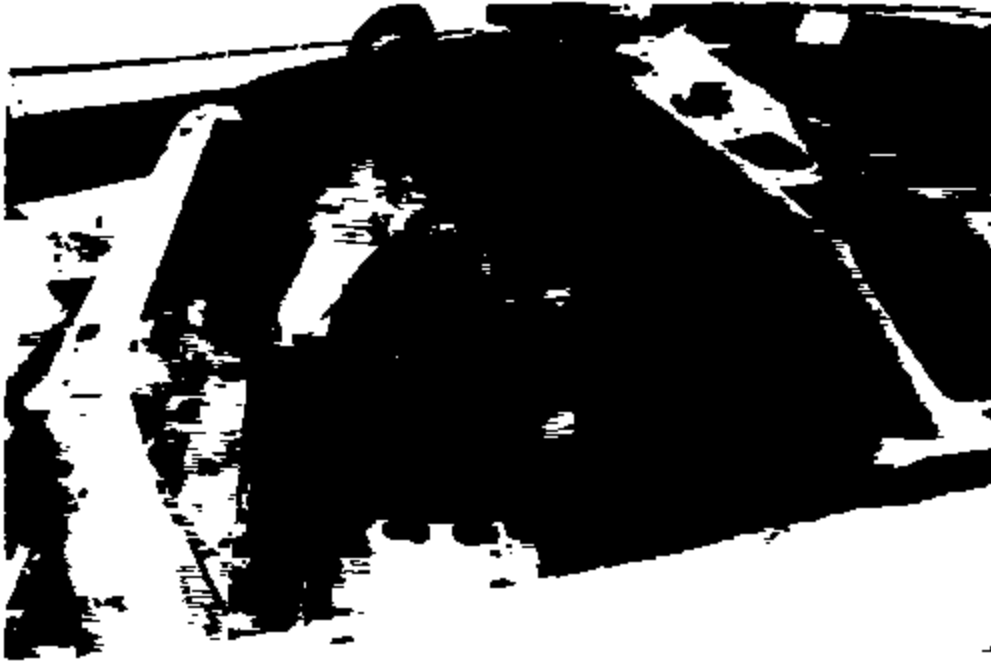


16. Right to left view of the engine compartment.



PCIA-0718 C 0732

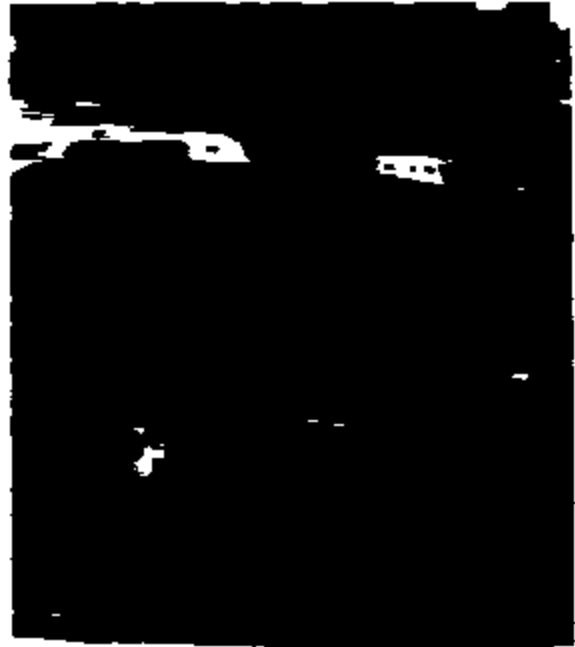
17. Left to right view of the engine compartment.



18. View showing the right third of ht engine compartment.

PERA-878 C 8783

19. View showing the center third of the engine compartment.



20. View showing the left third of the engine compartment.



PERM-878 C 873A

21. View showing the power distribution center.



22. Closer view of the power distribution center.



PCDA-078 C 0730

23. View showing the ABS electro hydraulic control unit.



24. View showing the cruise control servo.



PC94-078 C 0738

25. View showing the right and left timing chain covers.



26. View showing the right valve cover.



PERM-078 C 0737

27. View showing the left valve cover.

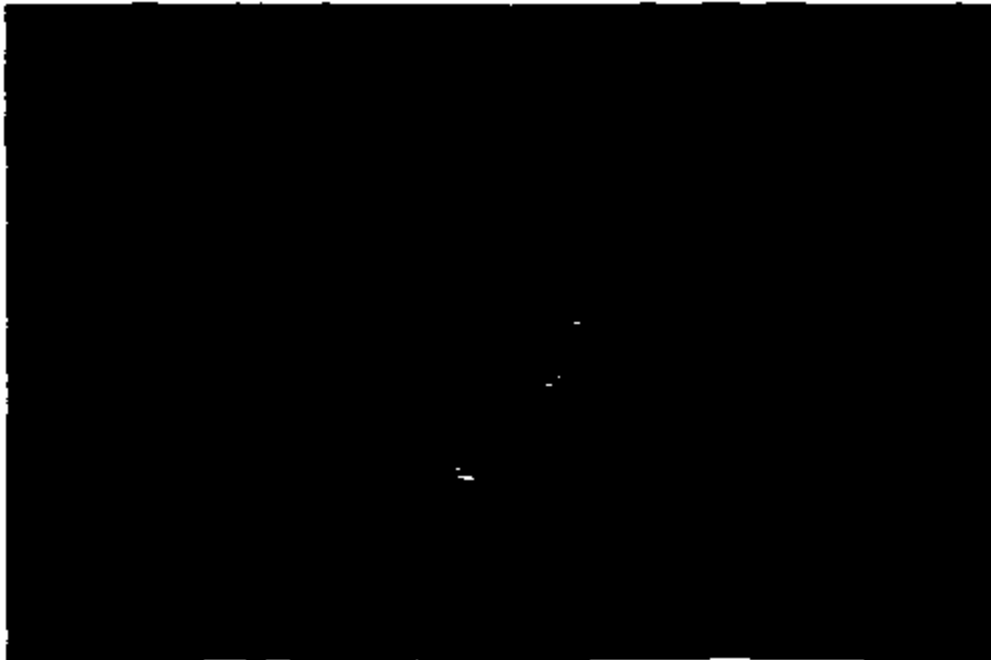


28. View showing the cruise control deactivation switch electrical connector.



PEM-STR C 8738

29. Closer view showing the cruise control deactivation switch electrical connector.



30. View showing the aftermarket electrical wire attached to the positive battery cable end.



PC84-878 C 8730

31. View showing the aftermarket electrical wire entering the firewall.



32. Closer view showing the aftermarket electrical wire entering the firewall.



PC04-078 C 0749

33. View showing the aftermarket electrical wire exiting the firewall passenger compartment side.

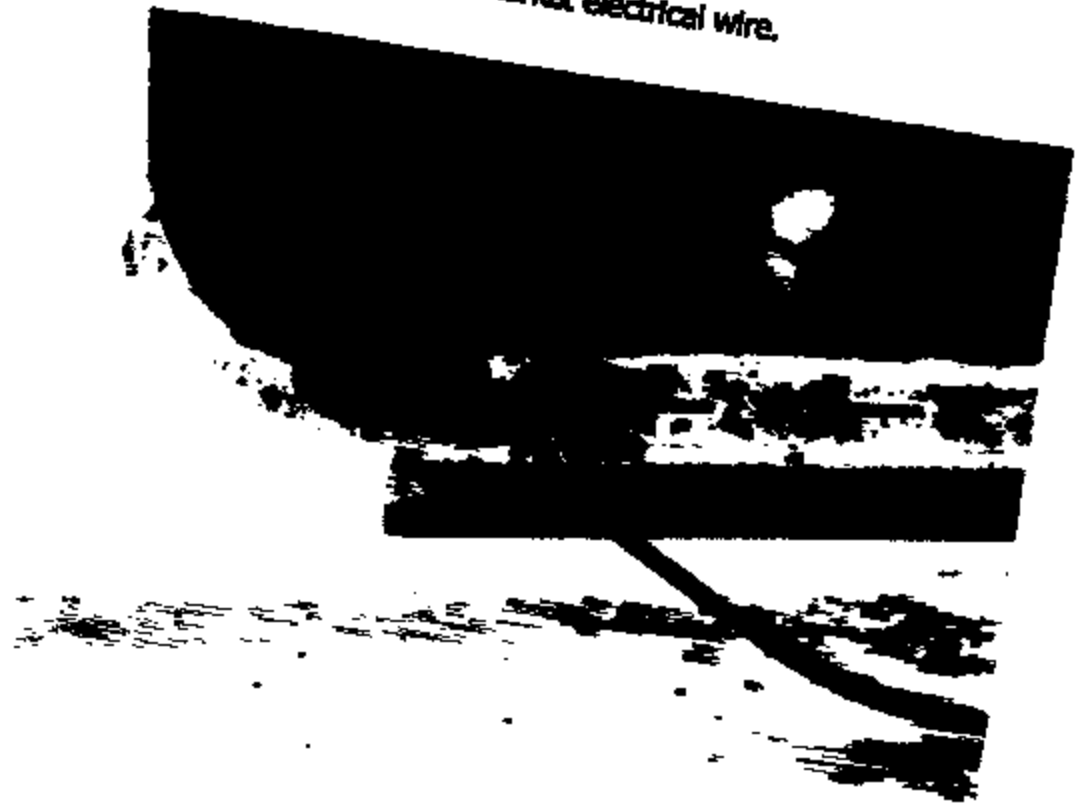


34. Another view of the aftermarket electrical wire.



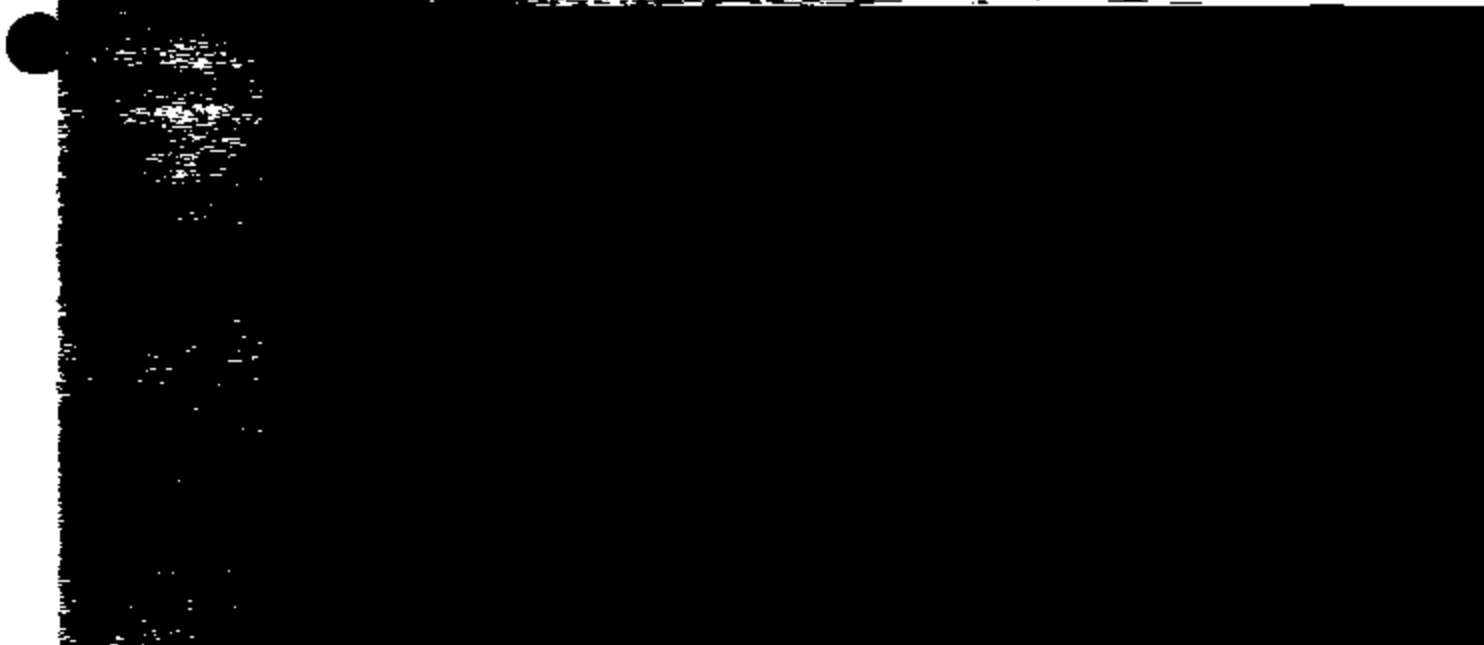
PC94-078 C 8761

35. Another view of the aftermarket electrical wire.



FD-302 (Rev. 8-7-82) C 8742

August 24, 2004



FEB-878 C 8743

FIRST PARISH COURT FOR THE PARISH OF JEFFERSON FOR RECORD

STATE OF LOUISIANA

04 JUN 30 PM 3:18

NO.: 138152

DIVISION A
CLERK
JEFFERSON, LA

VS.

FORD MOTOR CORPORATION

FILED: _____

BY CLERK

PETITION FOR DAMAGES

NOW INTO COURT through undersigned counsel comes
[REDACTED] a domestic
insurer authorized to do and doing business in the State of
Louisiana and [REDACTED] a person of the full age of
majority and a resident of St. Charles Parish who submits
the following:

I.

Made defendant herein is FORD MOTOR CORPORATION a
foreign corporation authorized to do and doing business in
the State of Louisiana with its principal business
establishment in Louisiana located in Metairie, Parish of
Jefferson, State of Louisiana.

II.

Defendant is liable to plaintiffs in the amount of
\$10,290.00.

III.

On or about September 24, 2003 [REDACTED] was the
owner of a 2004 F150 pickup truck which was parked in the
driveway of his home at [REDACTED] Des Allemands,
Louisiana. On that date the truck caught fire while parked
in the driveway causing significant damage to the pickup
truck owned by [REDACTED]

IV.

On September 24, 2003 there was in full force and effect a policy of insurance issued by [REDACTED] to [REDACTED] the owner of the vehicle. Under the terms of the policy the insured paid to [REDACTED] \$10,190.15 as a result of the loss arising out of the aforementioned fire. Due to paying such proceeds [REDACTED] is partial subrogated to the rights of [REDACTED]. Furthermore, under the terms of the policy [REDACTED] had a deductible of \$100.00.

V.

Defendant, Ford Motor Company, which manufactured the truck is liable to our petitioners for the negligence and/or fault in the following:

- (a) not exclusive particulars including actions falling within the purview of the Louisiana Products Liability Act, La. R.S. 9:2800.51 et seq. including but not limited to the design and manufacture of a vehicle with inherent defects which defendant knew or should have known could cause a fire;
- (b) the sale of a vehicle with inherent defects which defendant knew or should have known could cause a fire;
- (c) failure to warn prospective purchasers of the vehicle about the likelihood the possibility that the vehicle might catch fire;
- (d) failing to issue a product recall of an inherently defective vehicle;
- (e) placing an inherently defective product into the stream of commerce;
- (f) manufacturing a product unreasonably dangerous in construction of composition;
- (g) manufacturing a product unreasonably dangerous in design;
- (h) any and all other acts of negligence that may appear herein at the discovery or at trial hereof.

WHEREFORE, petitioners pray that Ford Motor Corporation be served with a copy of the petition and that it be cited to appear and answer same and after all legal delays and proceedings had there be judgment herein in favor of [REDACTED]

[REDACTED] in the amount prayed for plus legal interest from the date of judicial demand until paid and for all costs of these proceedings and for all general and equitable relief.

Respectfully submitted,

At Nancy Choerle

NANCY CHOERTLE, ESQUIRE
PORTEOUS, HAINKEL & JOHNSON
704 Carondelet Street
New Orleans, LA 70130
(504) 581-3838
LA. BAR NO. 18855

PLEASE SERVE:

Ford Motor Corporation
Thru its agent for service of process:
CT Corporation
8550 United Plaza Blvd.
Baton Rouge, Louisiana 70809

A TRUE COPY OF THE ORIGINAL
IS FILED IN THIS OFFICE

[Signature]
DEPUTY CLERK
FIRST PARISH COURT
PARISH OF JEFFERSON

LAW OFFICES

ORTEOUS, HAINKEL & JOHNSON, L.L.P.

704 CARONDELET STREET
NEW ORLEANS, LOUISIANA 70130-3774
www.ghjlaw.com

Nancy Cromartie

TELEPHONE: 504-381-3838
FAX: 504-381-4669

May 4, 2004

493636

RECEIVED MAY 11 2004

Shawn L. Norton
Claims Analyst/Litigation Assistant
Ford Motor Company
Parklane Towers West - Suite 300
Three Parklane Blvd.
Dearborn, Michigan 48126-2568

RE:	Claim No.:	[REDACTED]
	Insured:	[REDACTED]
	Loss Date:	09/24/03
	OUR FILE:	325-4181

Dear Mr. Norton:

Please note that we are in receipt of your April 23, 2004 records and have previously provided you with the information requested within.

You have received color photographs of the vehicle's collision/fire damage; you have received the documentation showing payment by [REDACTED]. If you bother to review the history provided by [REDACTED] in the expert's report you would see the complete service history of the vehicle (which was done at your dealership) and whether any after market additions were made. Further, if you had referred to our first letter you would have learned the current location of the vehicle.

Please contact me if you have any additional questions.

Sincerely,

NANCY CROMARTIE

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Figure 1



Figure 2

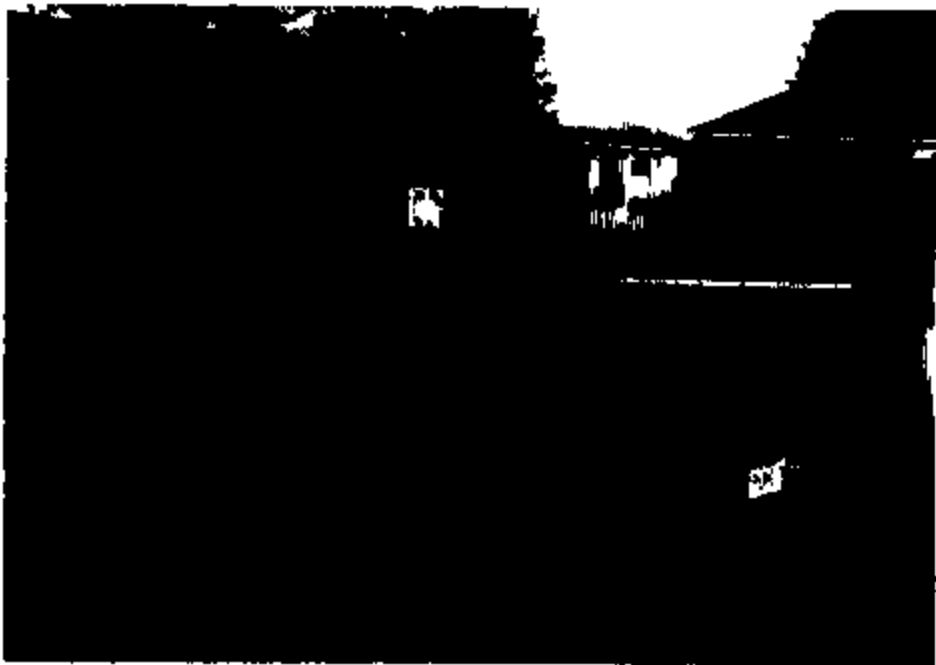


Figure 3



Figure 4

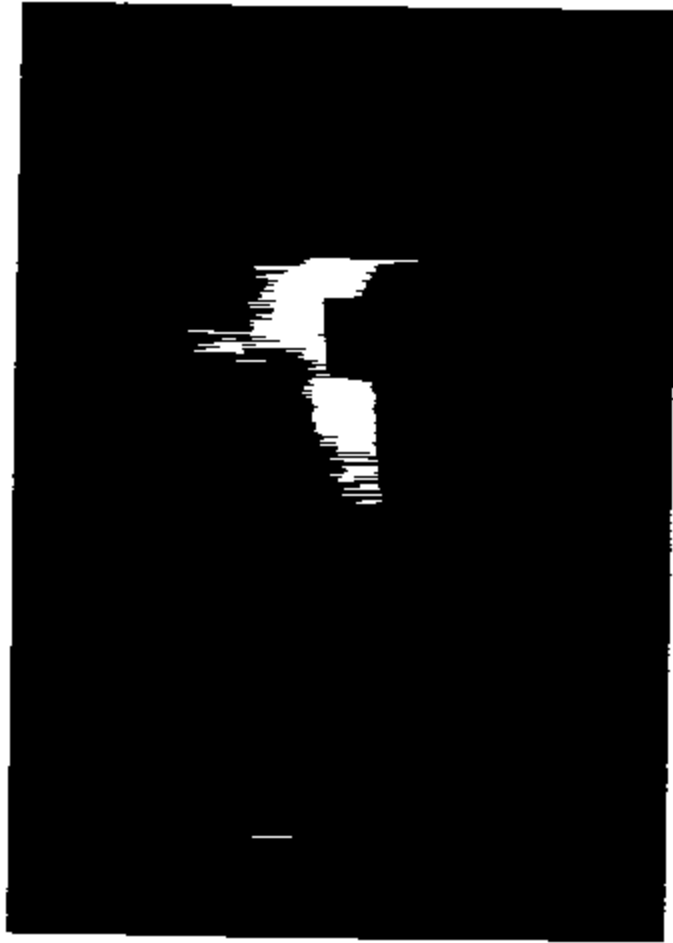


Figure 5



Figure 6



Figure 7

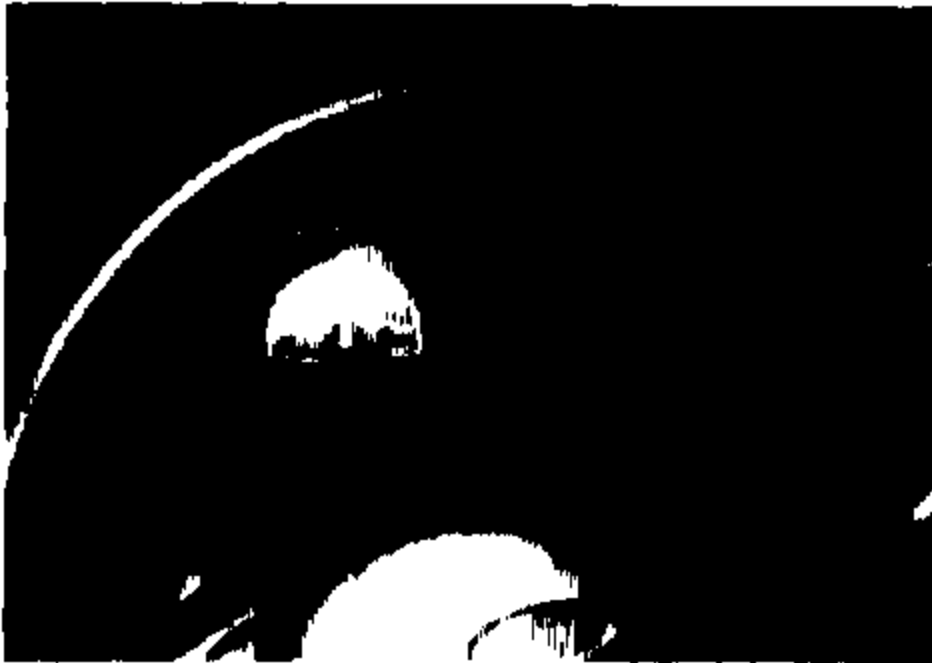


Figure 8

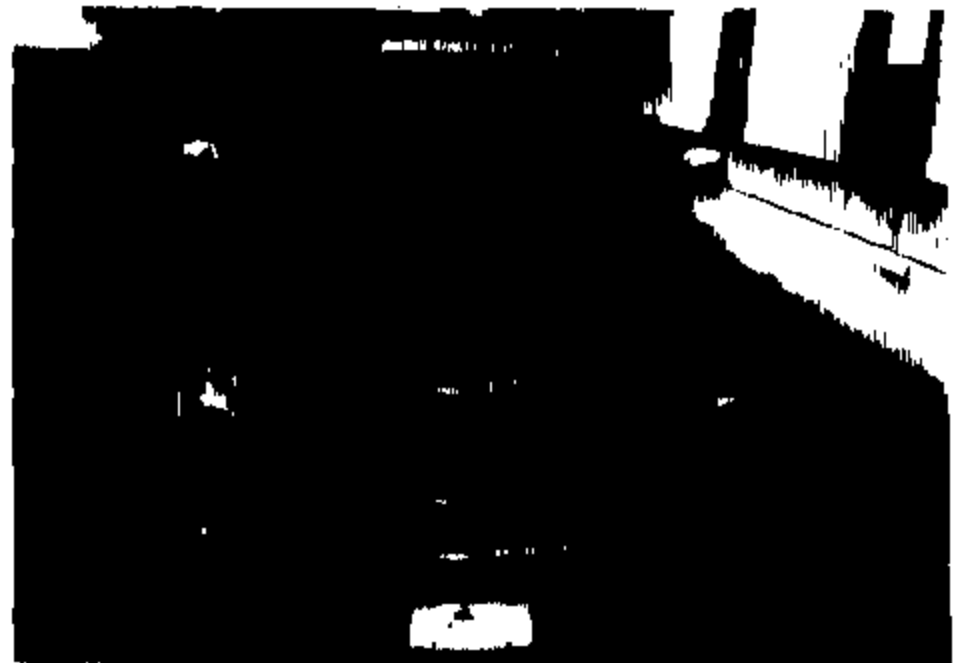


Figure 9

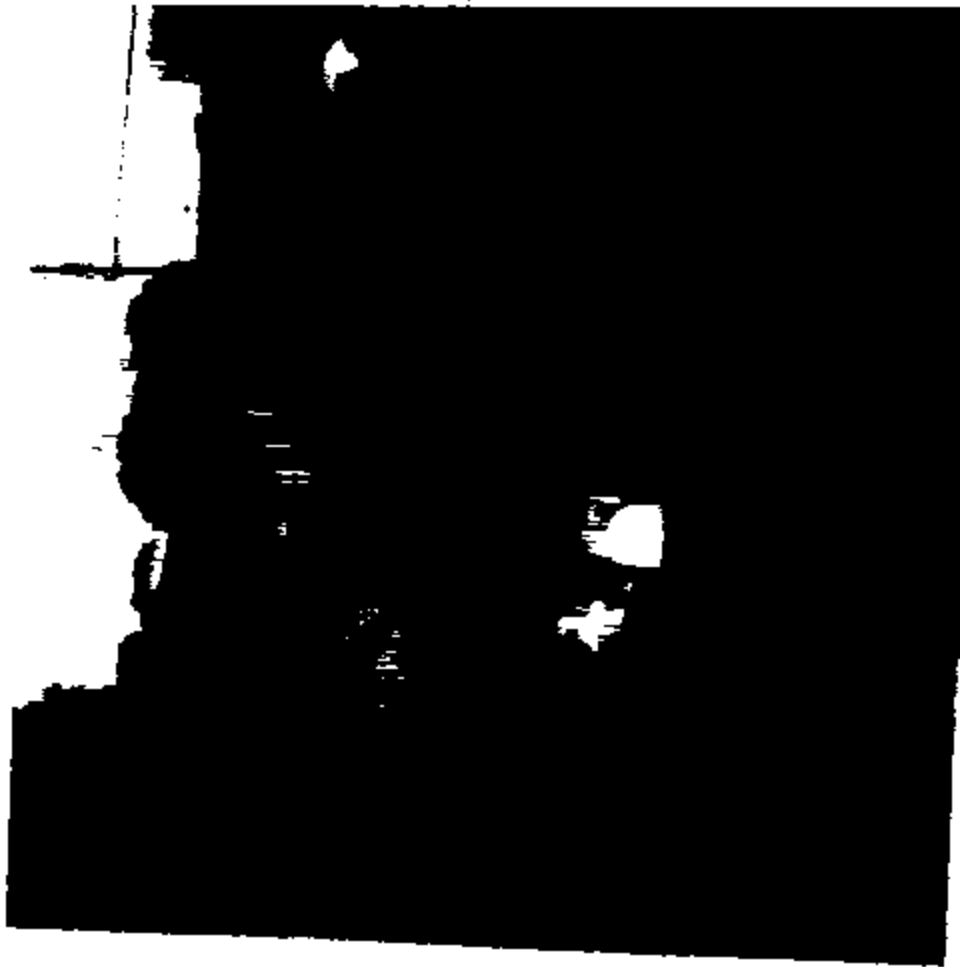


Figure 10



Figure 11



Figure 12

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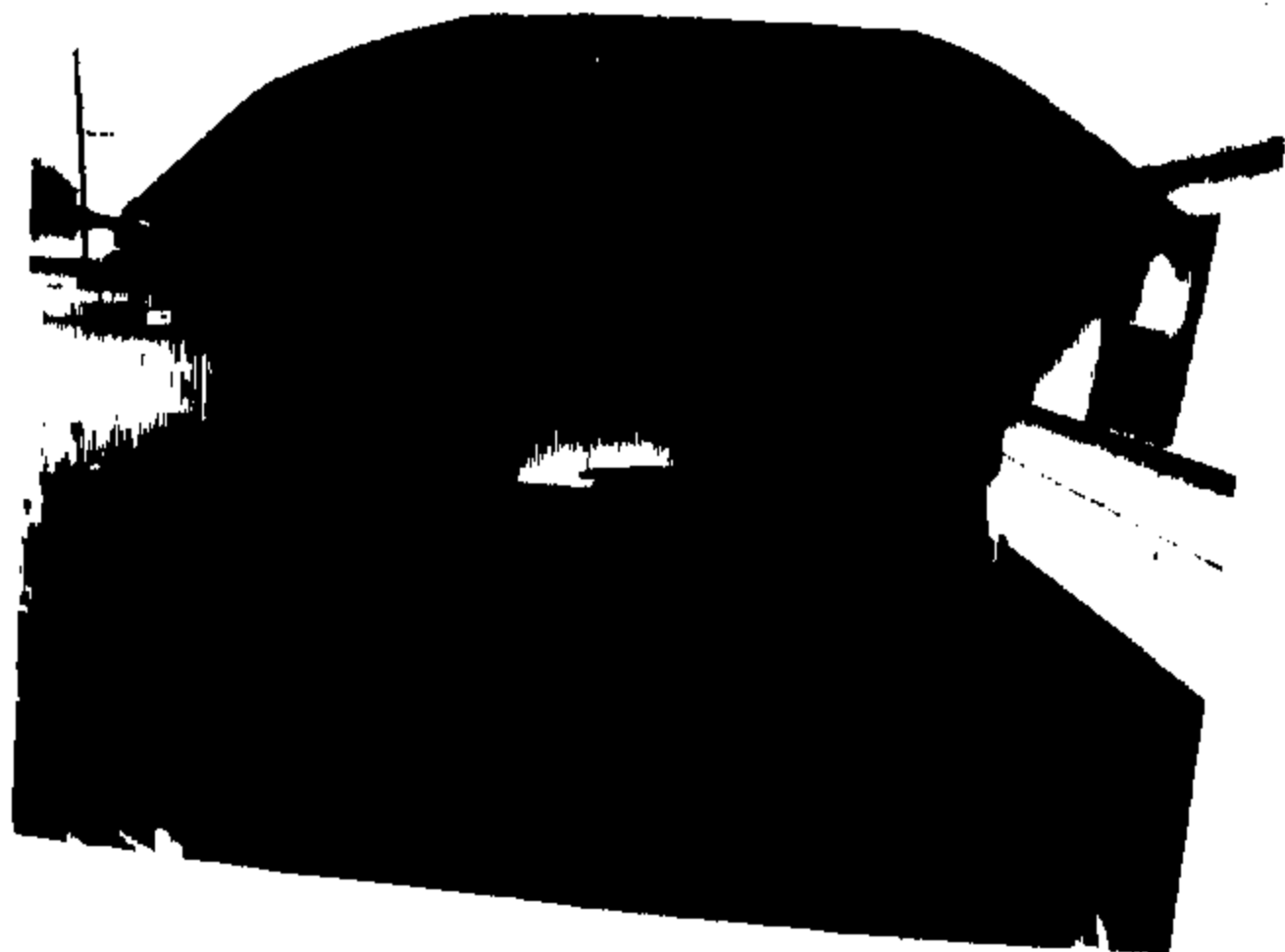


Figure 13



Figure 14

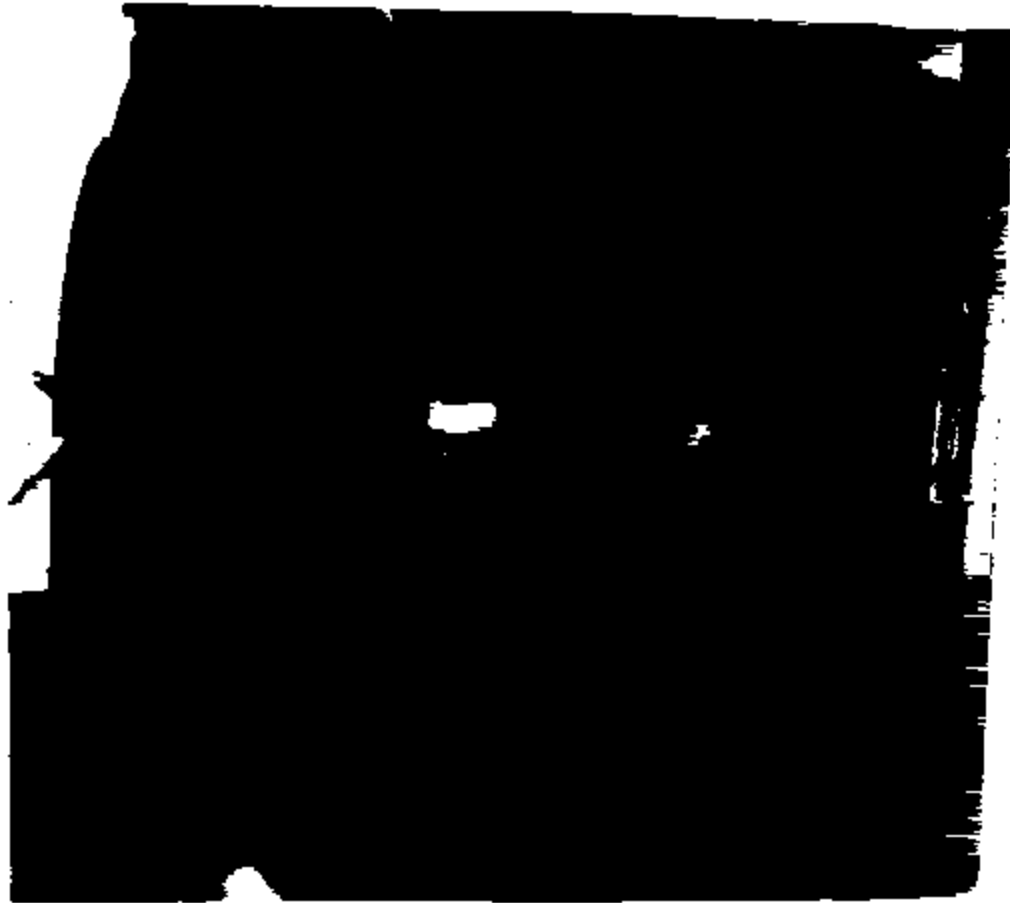


Figure 16

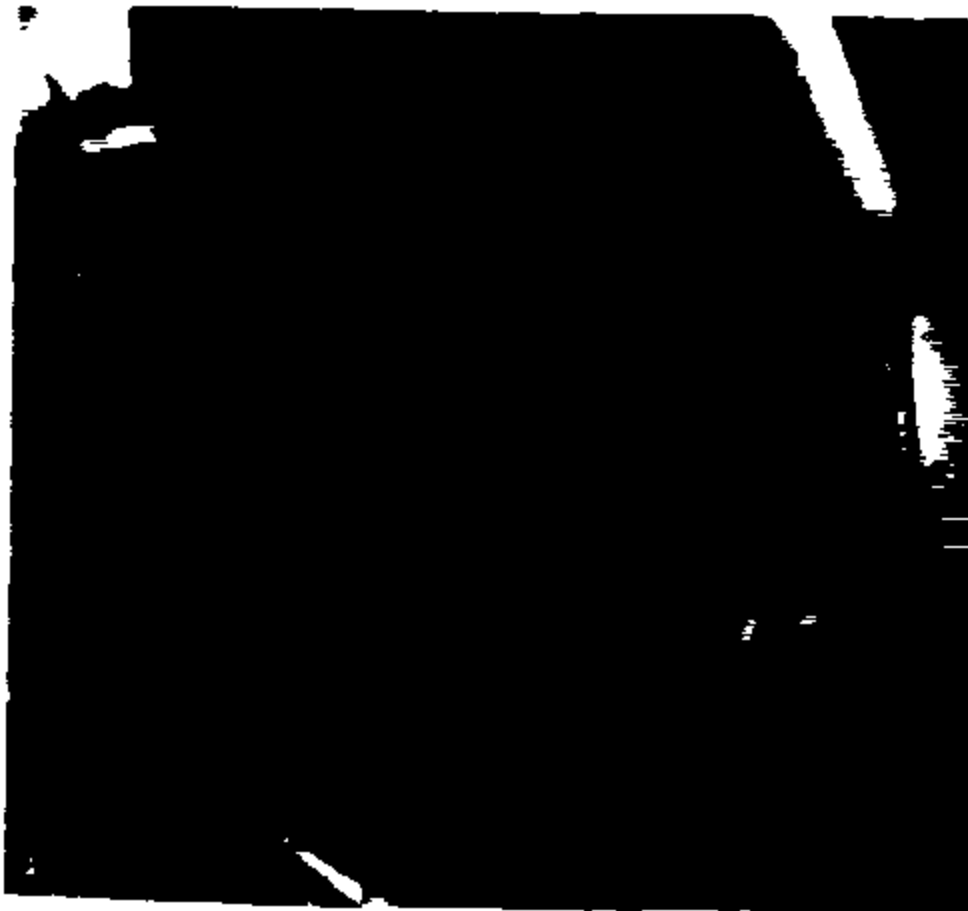


Figure 15

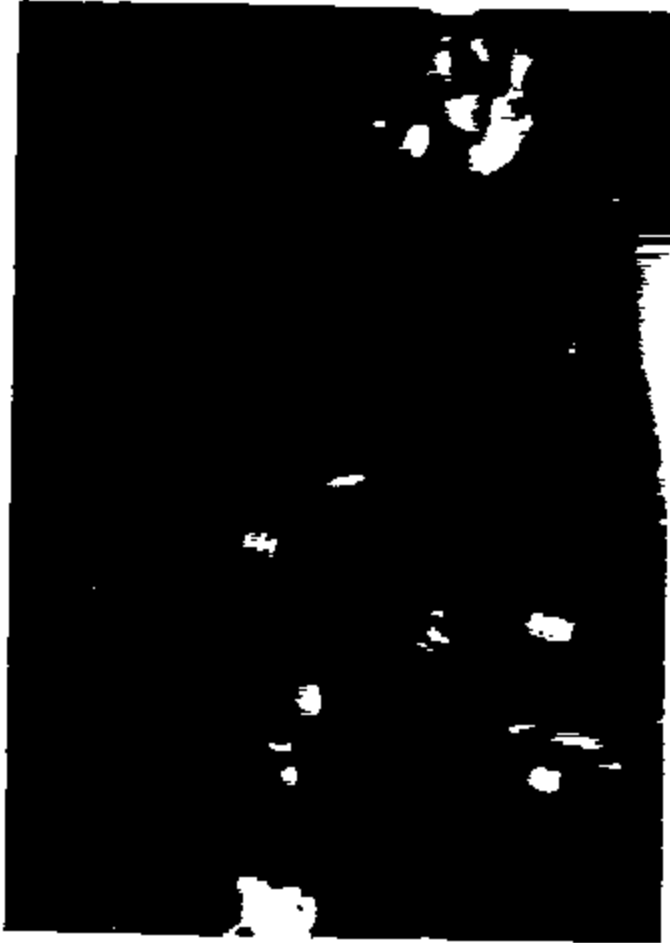


Figure 17

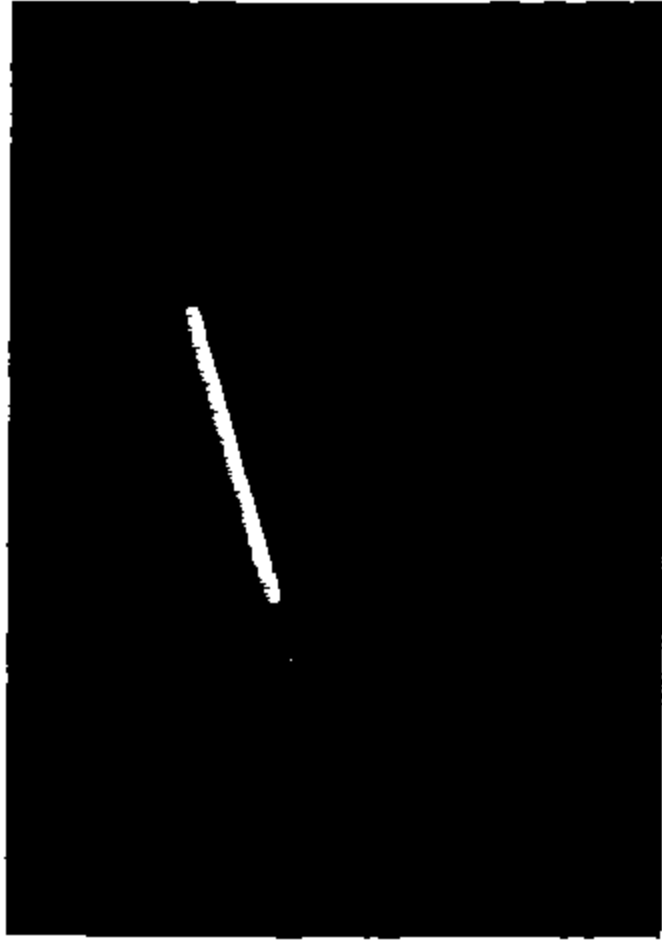


Figure 18



Figure 19

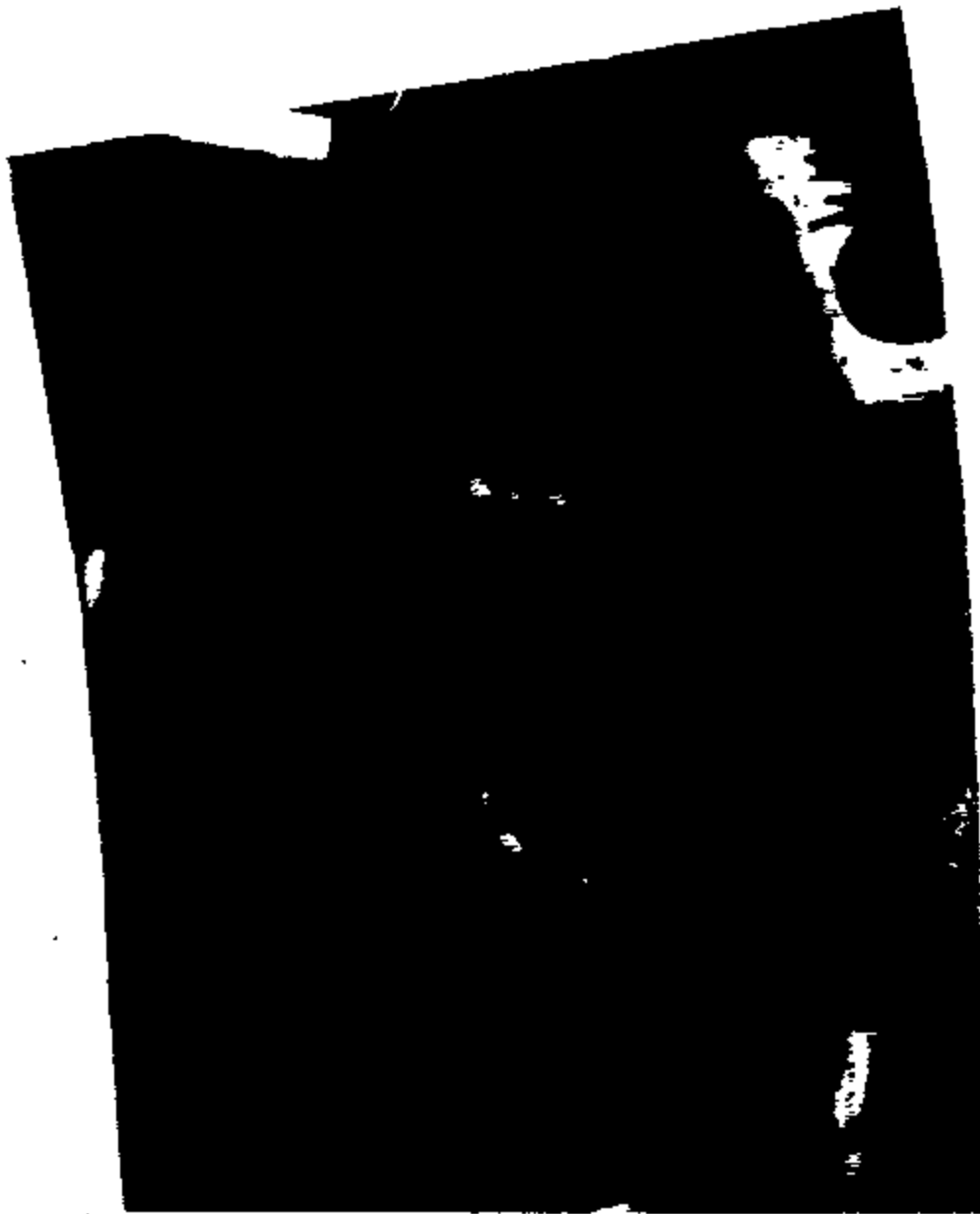


Figure 20

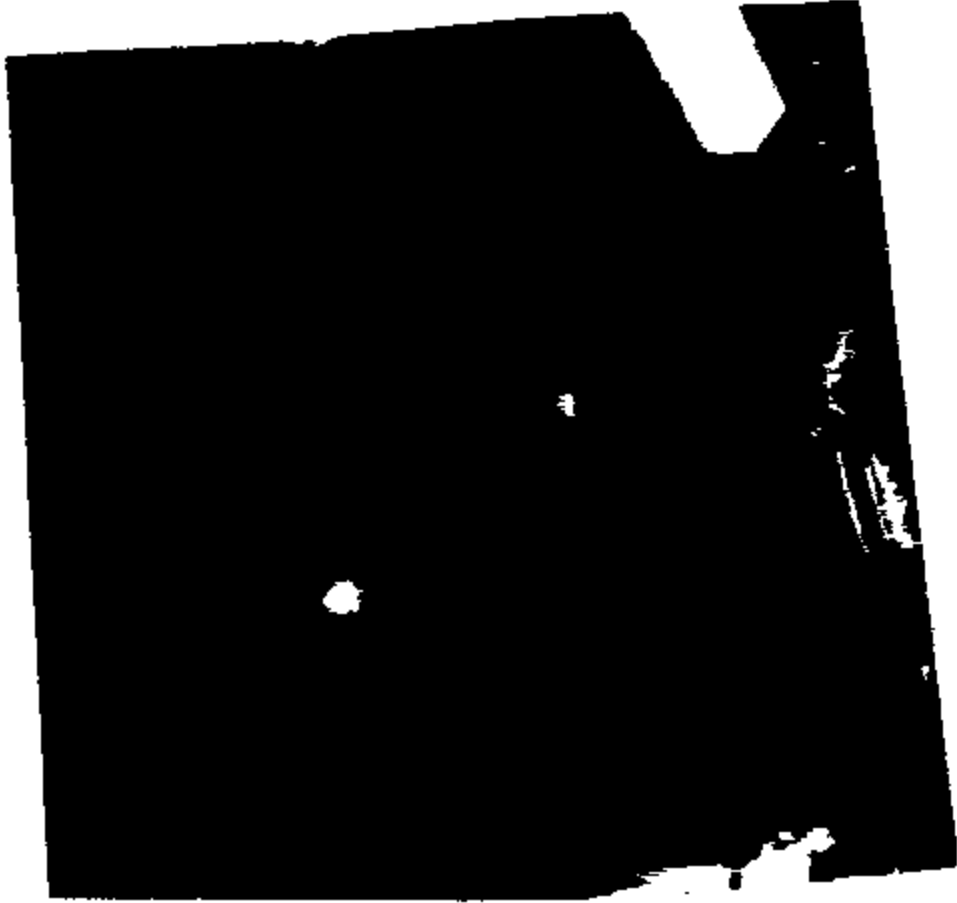


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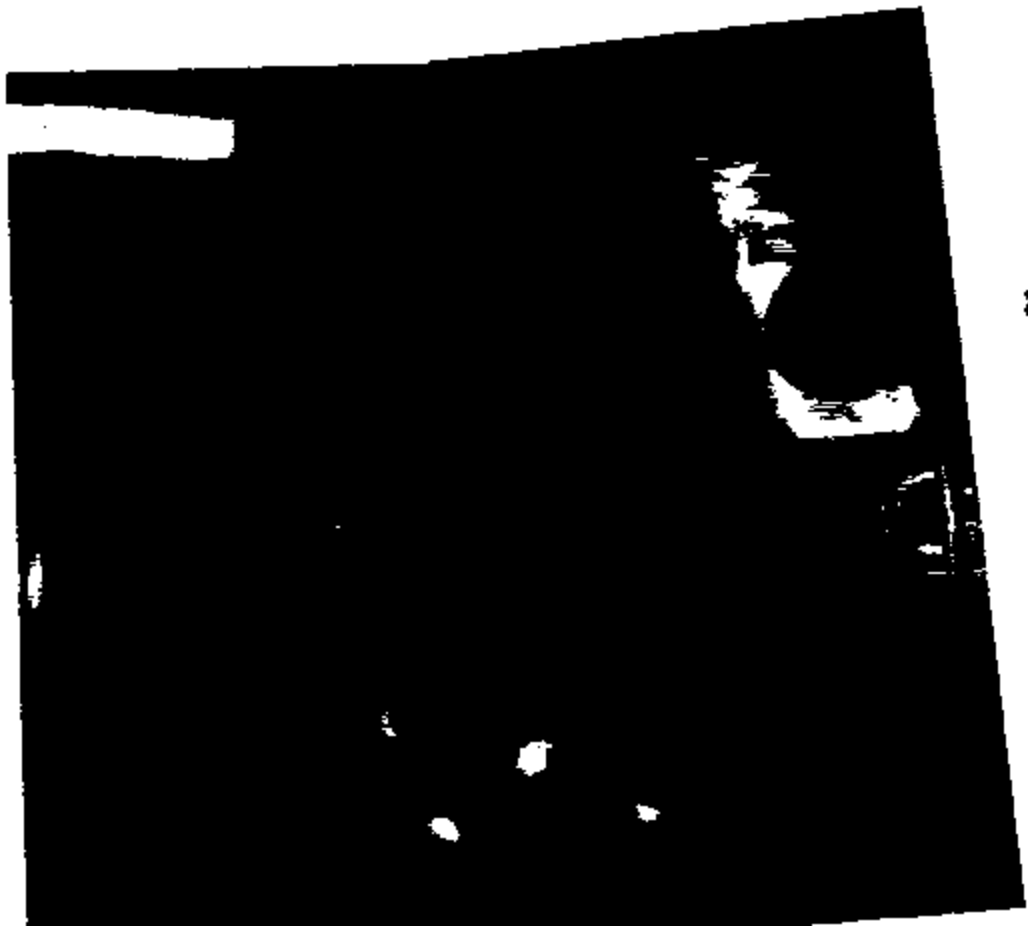


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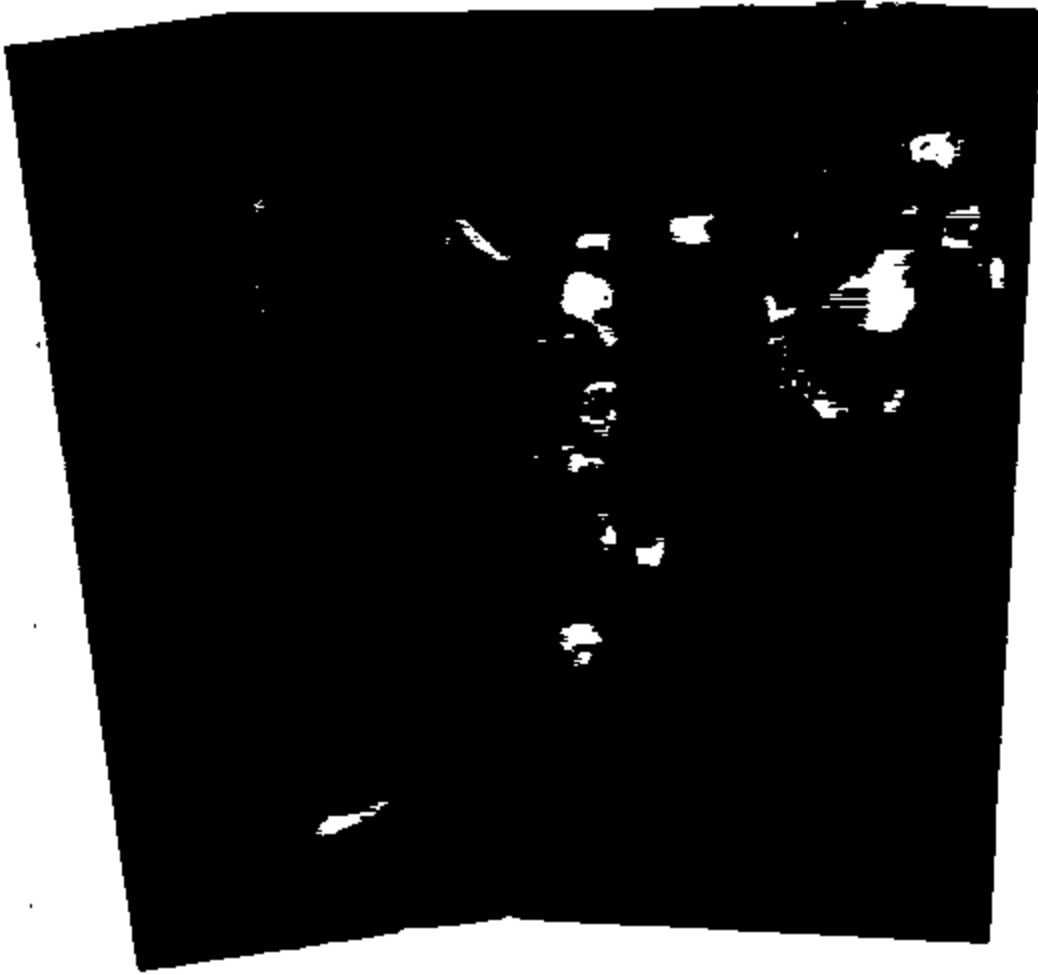


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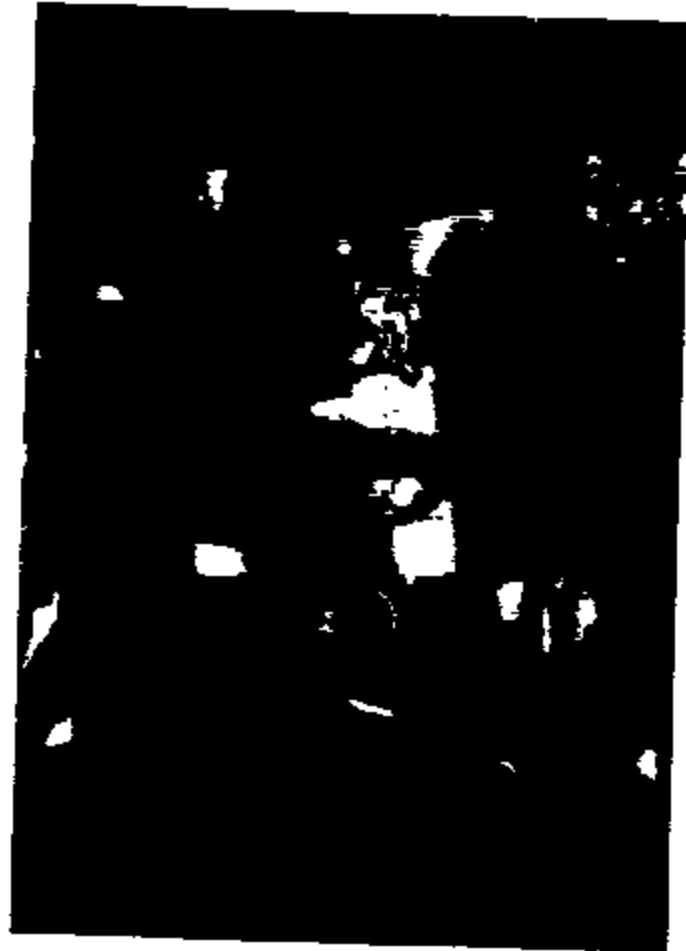


Figure 23



Figure 26



Figure 25



Figure 28



Figure 27



Figure 30



Figure 29



Figure 31



Figure 32



Figure 34

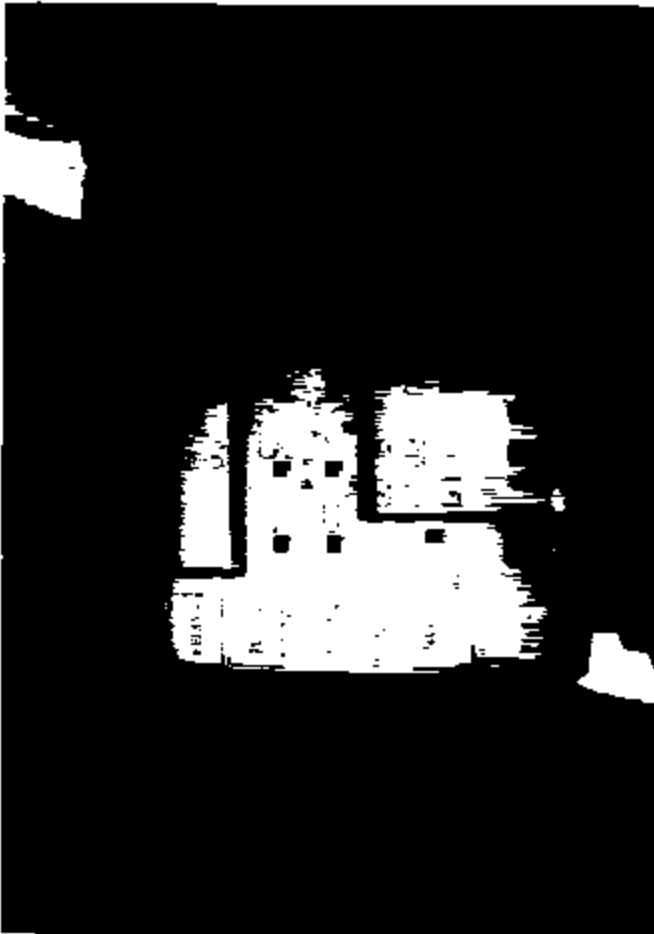


Figure 33

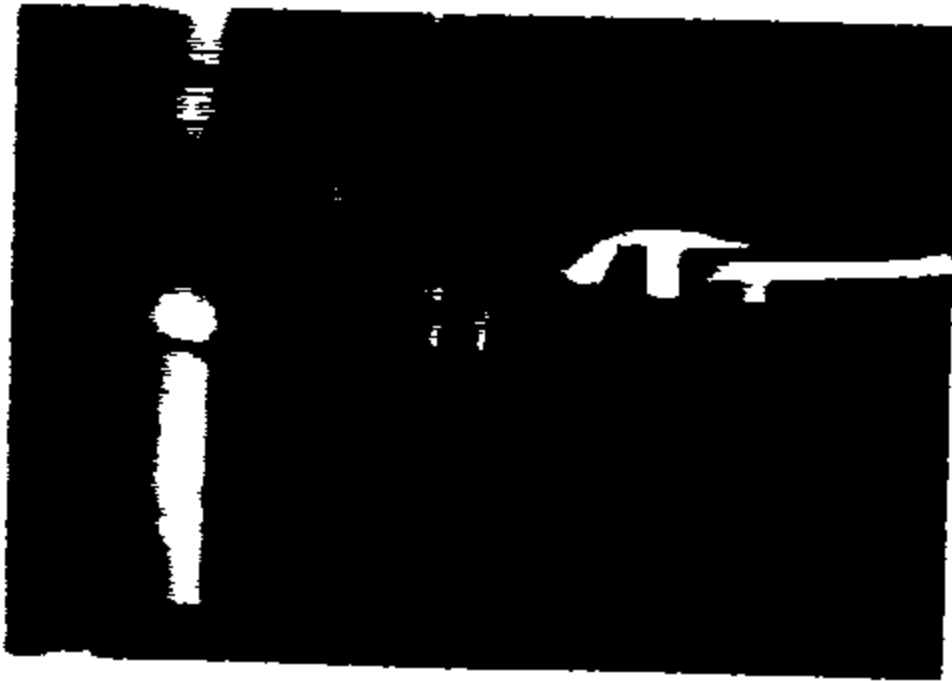


Figure 36



Figure 35



Figure 38



Figure 37



Figure 39



Figure 40

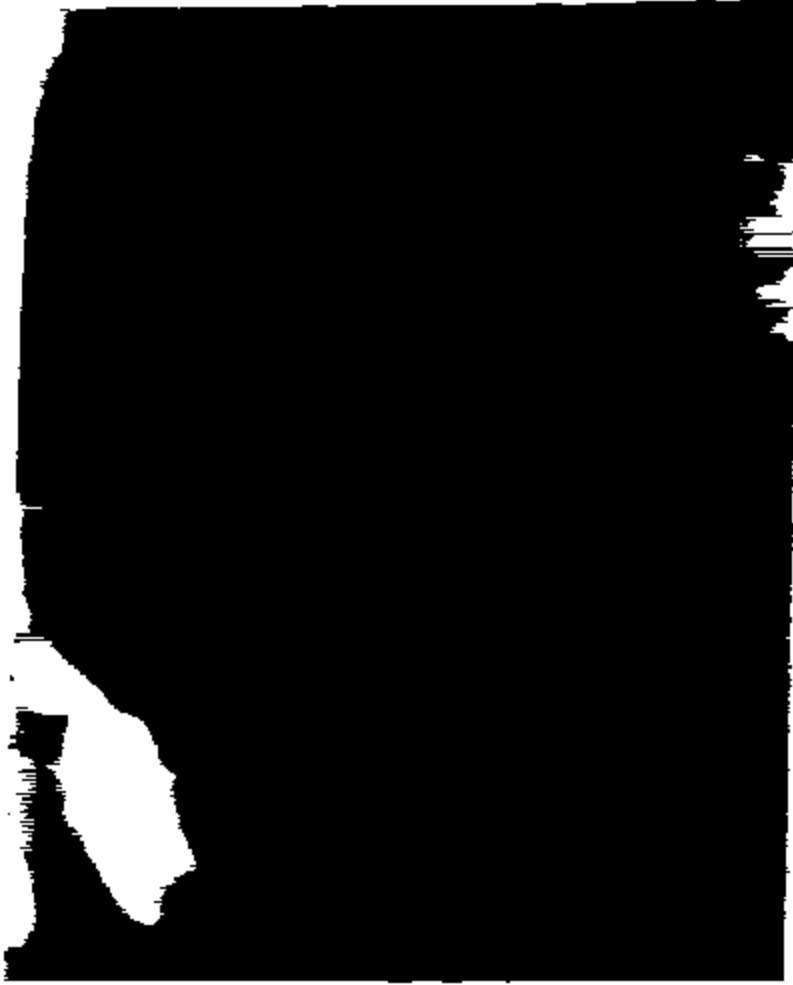


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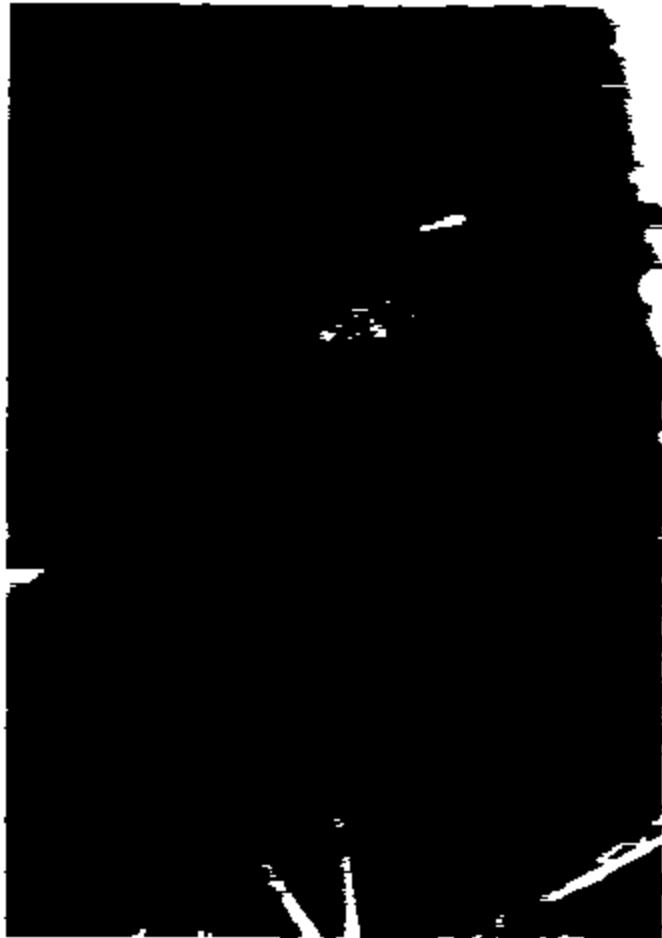


Figure 41



Figure 43



Figure 44



Figure 45



Figure 46



Figure 48



Figure 47



Figure 49



Figure 50

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Figure 51



Figure 52

ME24-876 C 8778

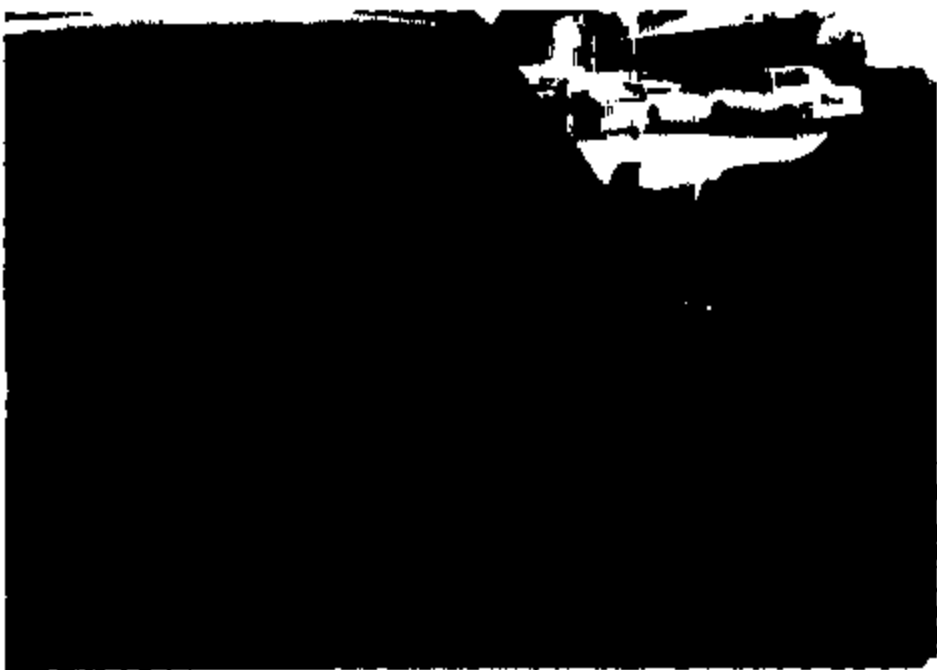


Figure 53



Figure 54

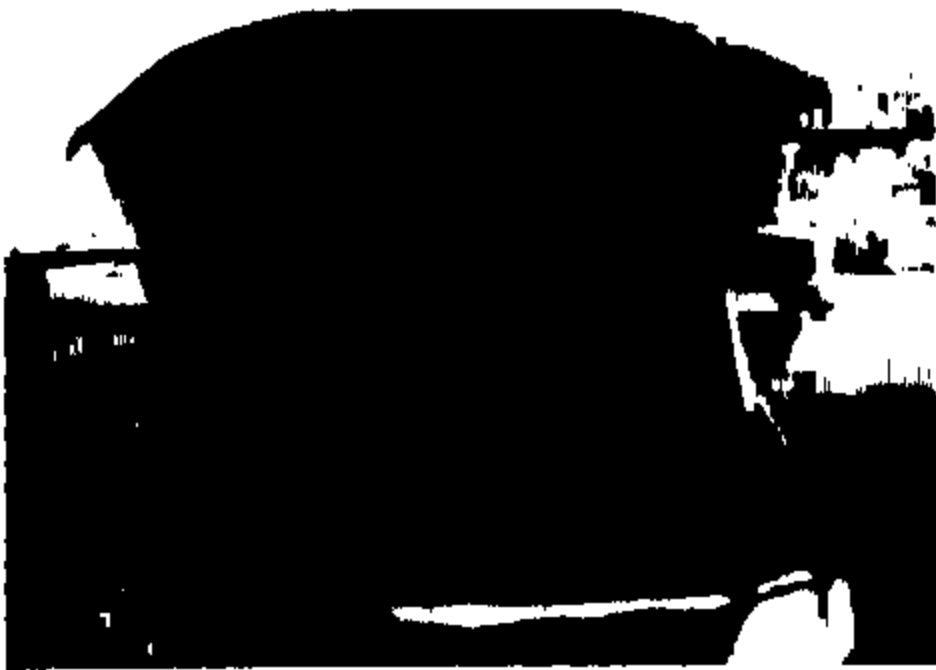


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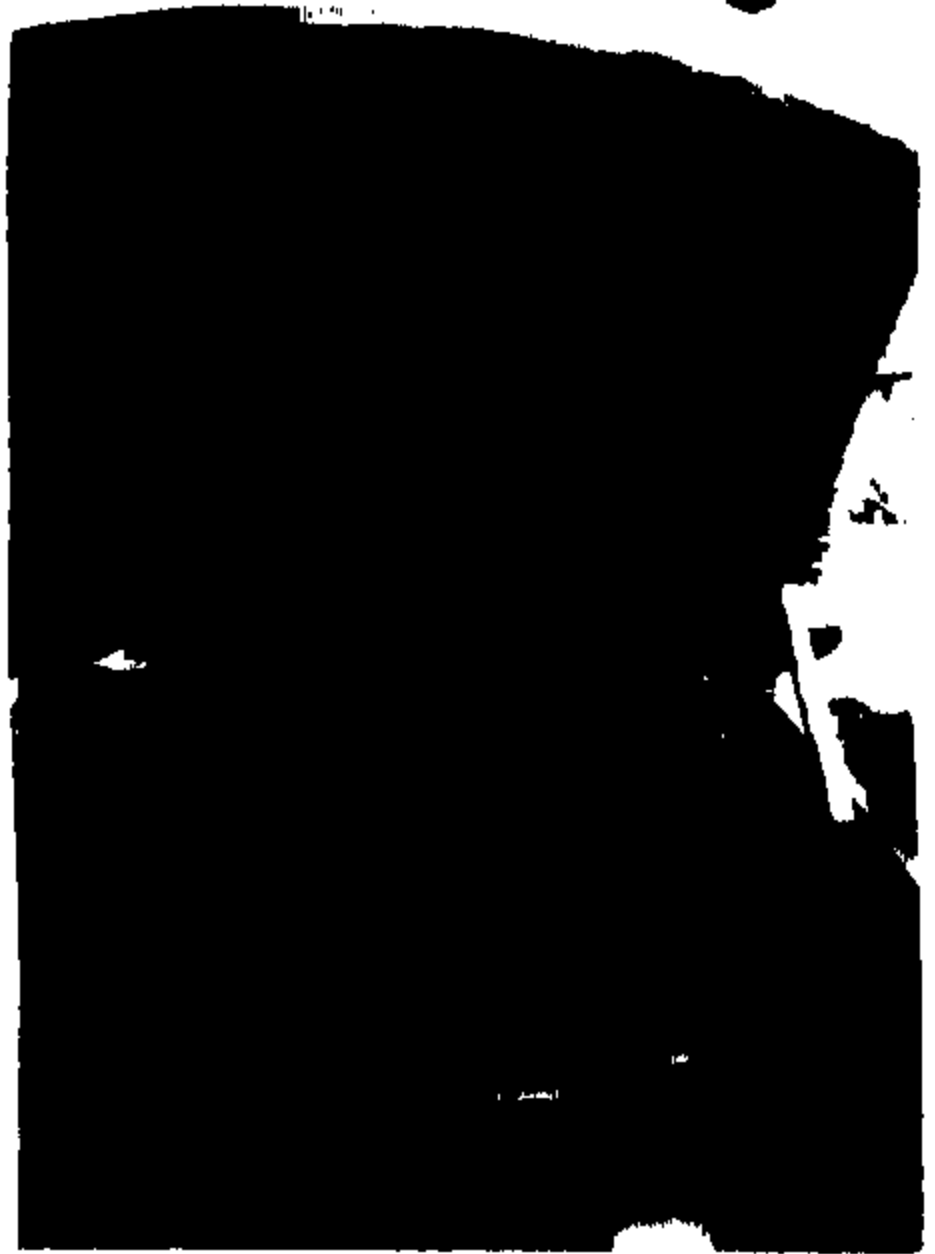


Figure 56



Figure 57



Figure 58



Figure 59



Figure 60



Figure 61



Figure 62



Figure 63



Figure 64

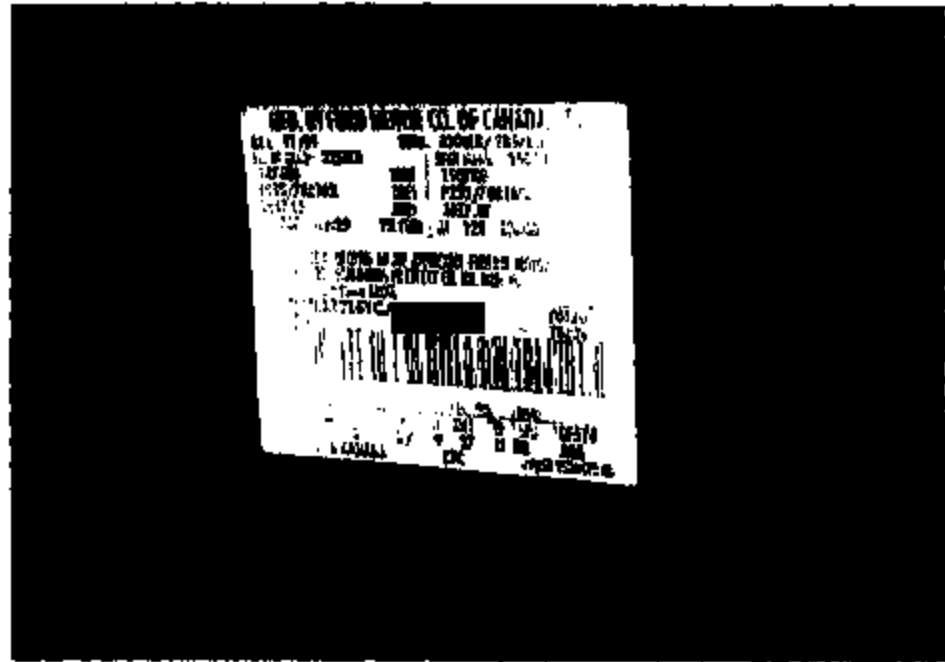


Figure 65

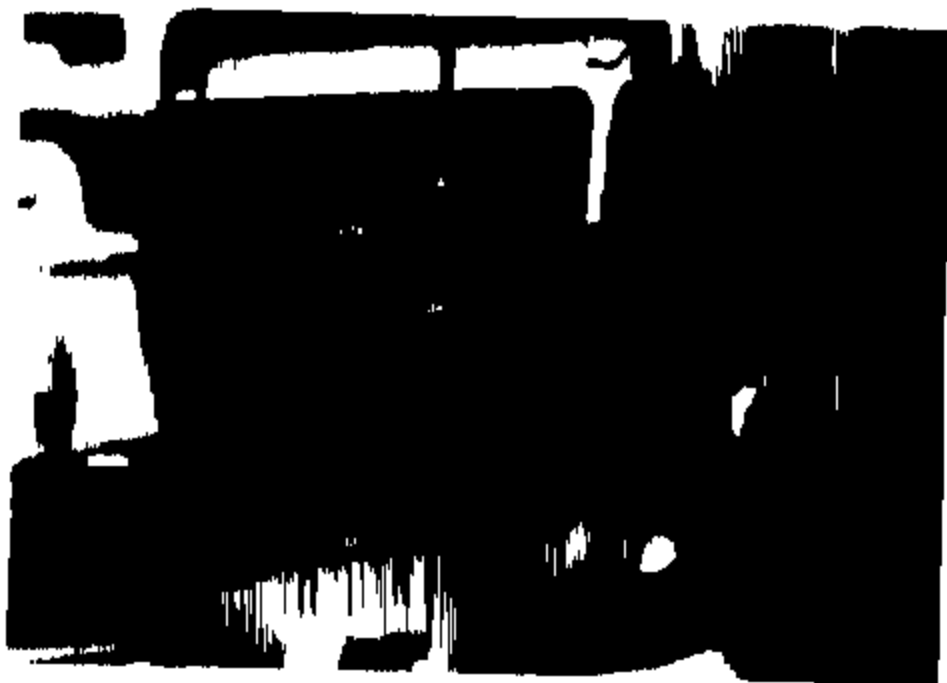


Figure 66



Figure 67



Figure 68

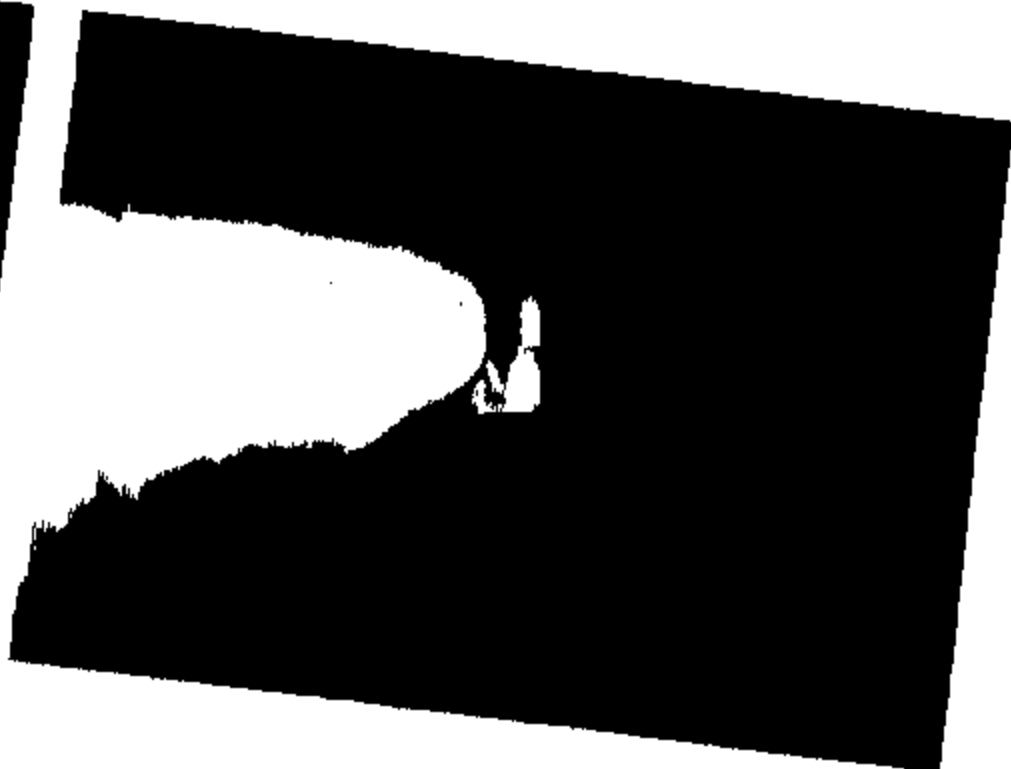


Figure 69

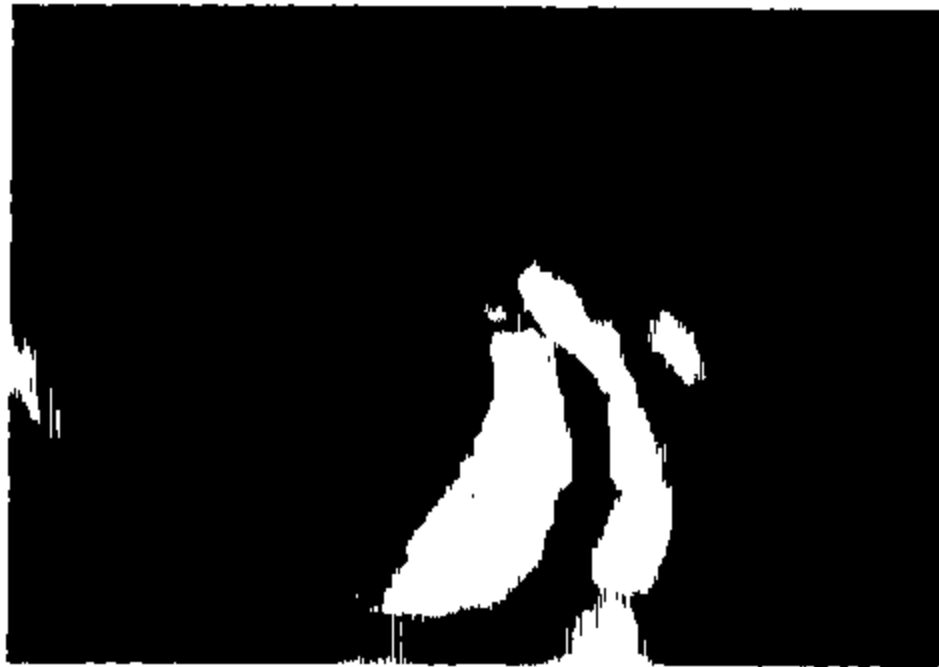


Figure 70

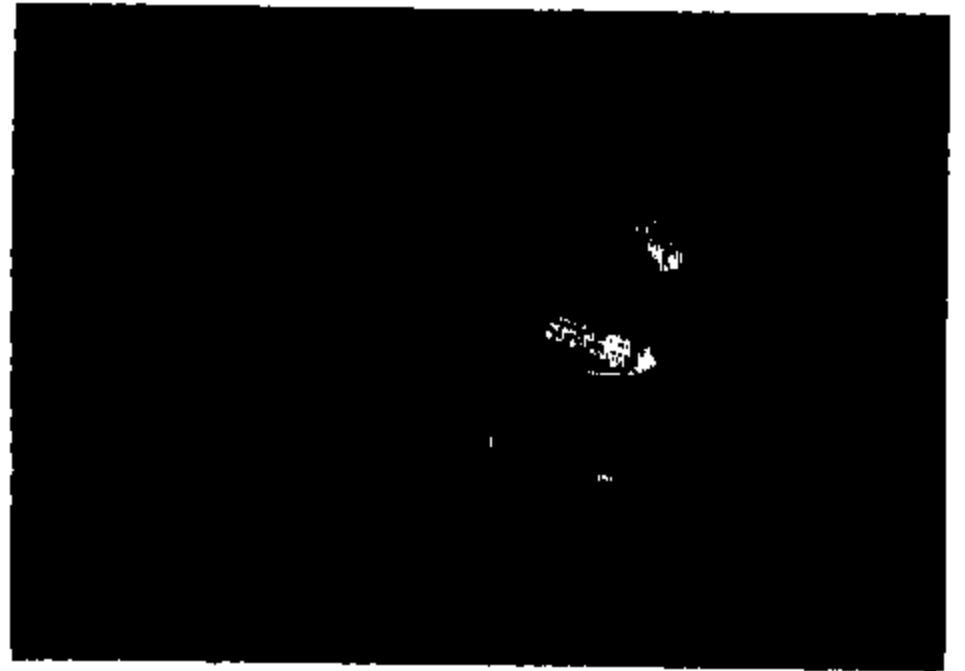


Figure 71



Figure 72



Figure 73



Figure 74

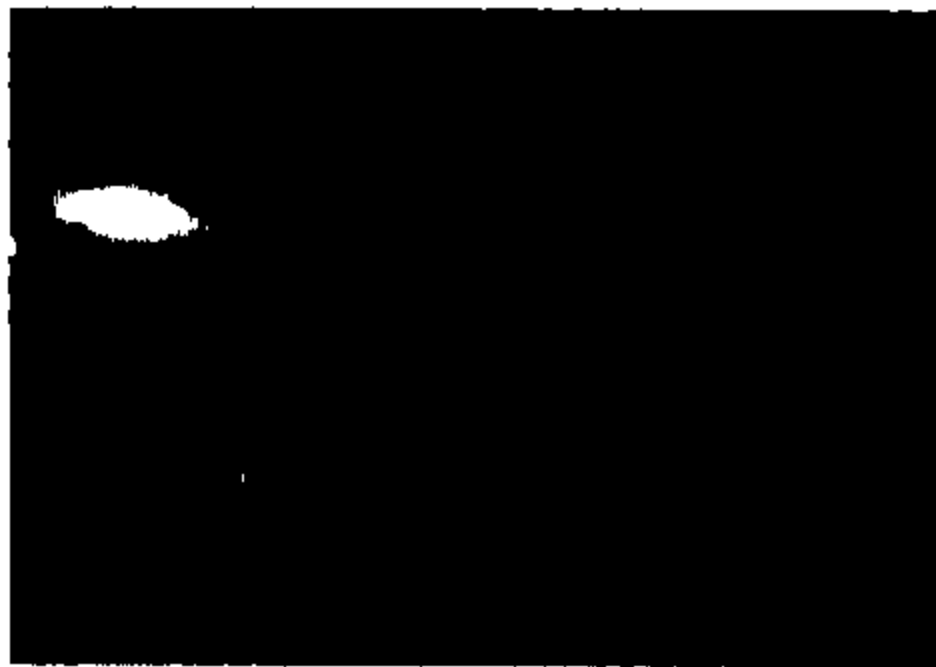


Figure 75

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Figure 76



Figure 77

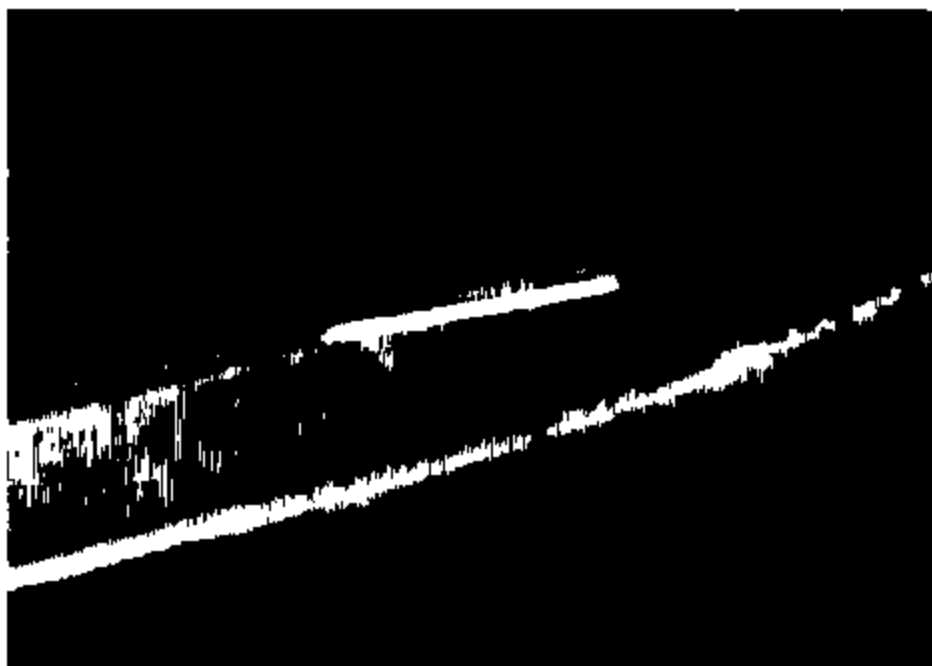


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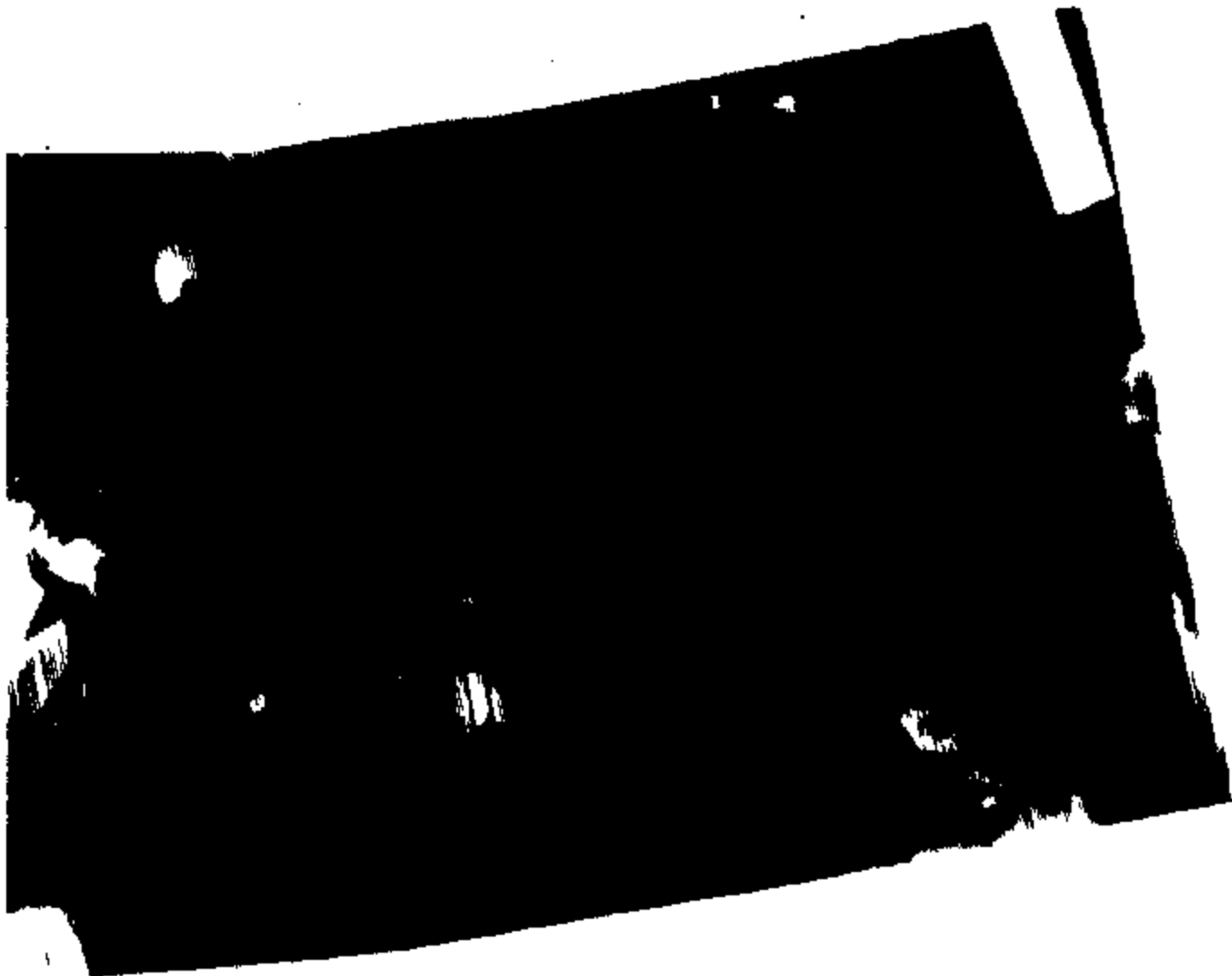


Figure 79



Figure 81

53



Figure 80