

PE04-078

FORD

1/28/2005

BOOK 3 OF 12

ATTACHMENT F

PART 5 OF 6

LAW OFFICES

PORTEOUS, HAINKEL & JOHNSON, L.L.P.

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

Nancy Cronan

TELEPHONE 504-581-3838
CONSUMER AFFAIRS
SECTION

February 16, 2004

CERTIFIED, RETURN RECEIPT REQUESTED FEB 24 10:16
NO. : 7001 2510 0001 3017 9175

Ford Motor Company
Customer Relations Center
P. O. Box 6248
Dearborn, MI 48126

FORD MOTOR COMPANY
RECEIVED
CLAIMS
FEB 26 2004
OFFICE OF THE
GENERAL COUNSEL

RE:	Michael
D/L:	09/24/03
OUR FILE:	325-4181

Gentlemen:

We the undersigned represent Louisiana [redacted] Company as subrogee to the rights of [redacted] as a result of a fire that occurred on September 24, 2003 at the home of [redacted] Des Allemands, Louisiana [redacted] involving his 2000 Ford F150 pickup truck.

[redacted] pickup was parked at his residence at approximately 5:00 P.M. on September 24, 2003 when a neighbor discovered a fire in the vehicle's engine compartment. The vehicle had been parked approximately fifteen minutes.

The vehicle was destroyed.

As a consequence of the policy issued by [redacted] and to [redacted] payment was made in the amount of \$10,290.15. [redacted] had a \$100.00 deductible on the policy at issue.

It is our contention, supported by the onsite investigations of M.A. Stringer & Associates, that this fire and resulting damage was caused by a product defect in the Ford pickup truck, more specifically originating at the speed control deactivation switch.

Therefore we are making demand for the payment of the above noted amounts.

- EXPT. VIN
- F105
- 9/24/03
- Des Allemands LA
- '00 F150
- \$ 19,300.00

FEB-24 2004 10:16

Enclosed in support of our demand is a copy of the M.A. Stringer & Associates December 3, 2003 report, the notice of payment, and a copy of the insurance policy issued to [REDACTED]

We also note that the vehicle is being maintained at the yard of insurance [REDACTED] Highway 59, Abita Springs, Louisiana and is available for inspection.

We would appreciate it if you would contact the undersigned so that we may discuss this claim.

Sincerely,



NANCY CROMARTIE

NC/ga
Enclosures



M. A. STRINGER & ASSOCIATES, INC.

(504) 454-0466

2805 Division Street, Suite 101
Metairie, Louisiana 70002
504-454-0992
504-454-0438 (Fax)

1210 Park Drive, Suite 100
Madisonville, Louisiana 70471
983-674-7677
(Fax) 983-674-7673

December 3, 2003

Mr. Richard Hagey, Special Investigator
Farm Bureau Insurance Company
P.O. Box 1609
Morgan City, Louisiana 70381

RE: Fire Analysis Report
Insured: [REDACTED]
Address of Loss: [REDACTED]
Des Allemands, Louisiana [REDACTED]
Date of Loss: 09-24-03
Claim Number: [REDACTED]
MASA Contract Number: [REDACTED]

Dear Mr. Hagey:

In response to the October 8, 2003 request of Mr. Martin Crawford, Claim Representative, Farm Bureau Insurance Company, Laplace, Louisiana, M. A. Stringer and Associates, Inc. (MASA) has examined and analyzed the above captioned vehicle fire loss. The vehicle was carefully examined on October 10, 2003 by Christian K. Mulkey, MASA Fire Specialist and again on November 4, 2003 by Mervin A. Stringer, MASA Chief Fire Specialist. During these examinations photographs were taken, some of which are included at the end of this report with the remainder being retained in the MASA file.

It was reported to MASA that the fire in the [REDACTED] 2000 Ford F-150 pick up truck occurred at approximately 5:00 p.m., while the vehicle was parked at his residence. It was also reported that a neighbor discovered the fire in the vehicle's engine compartment. It was lastly reported that the vehicle was equipped with cruise control. During the initial visit to the insured's residence, to examine the vehicle, Mr. Mulkey was advised by the insured, [REDACTED] that the

vehicle had approximately 160,000 miles on the odometer, at the time of the fire. The vehicle was last driven for approximately fifteen (15) minutes, was parked and the fire was discovered approximately one and one half (1.5) hours later. [REDACTED] had experienced no problems with the vehicle and there had been no recent repairs. It was subsequently learned from [REDACTED] that he purchased this vehicle new, from Regency Ford in Metairie, Louisiana, in April of 2000. The vehicle had all factory installed equipment and no after market equipment had been added. At the time of the vehicle purchase, he also purchased an extended 125,000 mile warranty. All of the service and regular maintenance was performed by professional businesses. [REDACTED] also reported that when he had approximately 90,000 miles on the vehicle, the engine had to be replaced, under the extended warranty. He reported that the engine replacement was accomplished by the Ford, Lincoln and Mercury dealer in Slidell, Louisiana. [REDACTED] reported that when he was alerted to the fire, by his neighbor, he observed that the fire was in the engine compartment and had burned a hole through the hood, on the drivers side, by the fire wall. He also reported that he and his uncle, who lives across the street from his residence, extinguished the fire using the garden hose. The fire department was notified, however, when they arrived he and his uncle had already extinguished the fire.

Prior to our initial site visit a search of the National Highway Transportation Safety Administration (NHTSA), Office of Defects Investigation (ODI), Recall Database was conducted, using their internet web site. This search revealed that there were no fire related recalls for this make and model vehicle. The recalls that were found are included at the end of this report.

Figures 1 through 4 are exterior views of the vehicle. As can be seen, the fire damage appears to be confined to the driver's side rear area of the engine compartment. Figure 5 is a view showing the Vehicle Identification Number (VIN) of 2FTRX17L6YC [REDACTED] which matched the reported VIN for this vehicle. Figure 6 is a passenger side view of the vehicle's interior and Figure 7 is a driver's side view. As can be seen, there is no fire damage in the vehicle's interior. The instrument panel is shown in Figure 8. As can be seen, the odometer is electronic, therefore, the vehicle's mileage could not be verified. Figures 9 and 10 are views showing the right front of the vehicle, which clearly show that this fire was primarily confined to the driver's side rear area of the engine compartment, as shown in Figures 11, 12 and 13. Figures 14, 15 and 16 are views showing the engine compartment. As can be seen in these figures, the primary fire damage is in the rear area of the engine compartment, on the driver's side. The transmission fluid level was checked, as shown in Figures 17 and 18, and found to be adequate for the normal operation of the vehicle.

Figures 19 through 22 are views showing the driver's side of the engine compartment, with the arrows pointing to the speed control deactivation switch, mounted at the front of the brake

system's master cylinder. Note that the plastic brake fluid reservoir, mounted on top of this master cylinder, has been consumed, along with its combustible brake fluid contents. As can be seen, there are two (2) wires leading to this switch, as shown in Figure 23, which is a hydraulic/electrical switch. Some of these switches, in earlier model vehicles, were recalled for fire related failures. Although this particular switch is not the subject of any known recall, our research of Ford Manuals has determined that this switch is supplied twelve (12) volts at all times that there is a battery installed in the vehicle. Figure 24 is an inboard view showing this switch and Figures 25 through 30 are additional views of this switch. Note that the wire insulation has been consumed and that the plastic, which encases the electrical contacts within this switch, has been consumed. Any closer examination of this switch would require destructive disassembly, which was not conducted. Figure 31 shows the location of the fuse panel. Figure 32 shows the fuse panel with its cover in place and Figure 33 shows the fuse panel cover, after its removal. The fuses in the panel, as shown in Figures 34 and 35, were examined and fuse numbers 3, 14 and 13 were found to be blown, as shown in Figures 36, 37 and 38. Subsequent research determined that fuse 13, a 20 ampere fuse, is for the speed control deactivation switch. This switch is referred to as the "brake pressure switch" in the Ford Manuals. The 20 ampere fuse, that was in place at the time of the fire, is the proper size fuse for this circuit, according to the Ford Manual. Figure 39 shows the engine compartment electrical distribution panel, located outboard from the speed control deactivation switch. As can be seen, the damage gradients and burn patterns on this plastic panel exterior, are consistent with a fire originating at the speed control deactivation switch. Examination of the wiring harness, at the fire wall, indicated that it was damaged by an external fire, as shown in Figures 40 and 41. Figures 42 and 43 are views of the engine compartment from the driver's side wheel well. As can be seen, the fire did not originate in this lower area of the engine compartment. Figures 44 through 48 are additional views of the engine compartment. As can be seen, the damage gradients and burn patterns indicate that this fire originated at the speed control deactivation switch.

During the November 4, 2003 examination of the vehicle by Mr. Stringer, at Insurance Liquidator's in Abita Springs, Louisiana, photographs were also taken. Figures 49 through 51 are exterior views of the vehicle. Figures 52, 53 and 54 show the fire damaged hood, with the hole bared through the aluminum hood above the area where the speed control deactivation switch is located, as shown in Figures 55 and 56. Figure 57 shows the engine compartment and Figure 58 shows the speed control deactivation switch, which is also shown in close up views in Figures 59 through 63. The driver's side interior is shown in Figure 64, the VIN number in Figure 65 and the examination of the 20 ampere speed control deactivation switch fuse 13 shown in Figures 66 through 70. Figures 71 and 72 show that the vehicle's gas cap was in place. Figures 73 and 74 show the engine oil dipstick, examination of which showed the level was adequate for the normal operation of the vehicle, as shown in Figure 75. Figures 76 and 77 show the transmission fluid dipstick, examination of which showed that its level was adequate for the normal operation of the

vehicle, as shown in Figure 78. Figures 79 and 80 again show that the damage gradients and burn patterns indicate that this fire originated at the speed control deactivation switch, which is again shown in Figure 81. As can be seen, the plastic portion of the switch, that covers the electrical connection and contacts, was consumed. No further examination of this switch could be performed without destructively disassembling the switch. Therefore, this switch was left in place.

As can be seen in a study of the figures, the damage gradients and burn patterns indicate that this fire originated at the speed control deactivation switch, located in the rear area of the engine compartment, on the driver's side. The 20 ampere fuse for this switch was blown and examination of the vehicle found no other reasonable source of ignition for the fire in this area. This switch, on prior model vehicles, was recalled and it has subsequently been learned that NHTSA is looking into extending the recall to include these switches through the 1997 model year. Our research of Ford Manuals has determined that this switch is energized at all times that there is a battery in the vehicle. Leakage of brake fluid from the hydraulic side of this switch assemble into the electrical side is known to have caused ignition of the switch in earlier model switches, which are of the same general design. The facts, circumstances and physical evidence indicate that this fire originated at the speed control deactivation switch, in the driver's side rear area of the engine compartment, and was caused by a failure in this defective switch.

Based on the results of the investigation conducted by MASA, as set forth in this report, it is the opinion of M. A. Stringer and Associates, Inc. that the September 24, 2003 fire in the Michael Dunn 2000 Ford F-150 pick up truck, originated at the speed control deactivation switch, in the driver's side rear area of the engine compartment, and was caused by a failure in this defective switch.

MASA appreciates the opportunity to be of service to you and [REDACTED] in this matter. If we can be of additional assistance in this or other matters, please do not hesitate to contact us.

Sincerely,

M. A. Stringer and Associates, Inc.

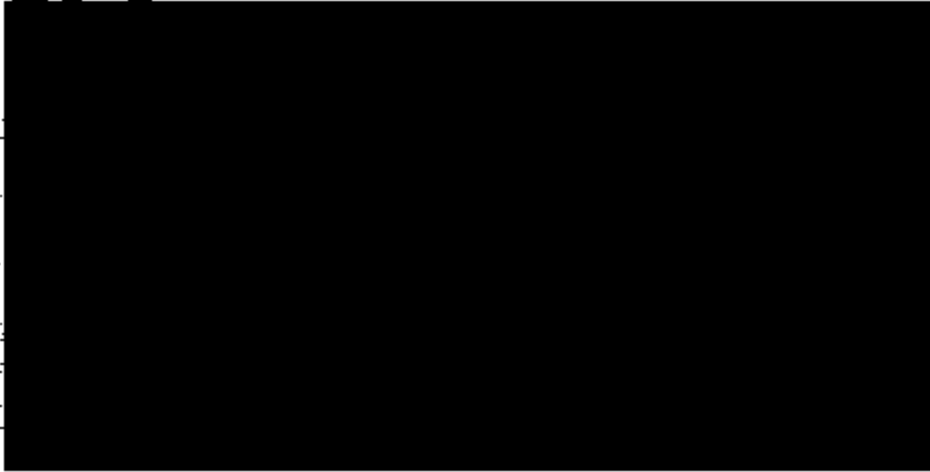


Mervin A. Stringer
Chief Fire Specialist



Christian K. Mulkey
Fire Specialist

MAS/ls



RECEIVED DEC 11 2004

WILLIAMS & MAHONEY, LLC

Attorneys at Law

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Beverly, Massachusetts 01915-6181

Telephone: (978) 232-9500 Facsimile: (978) 232-9222

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David M. Williams
David P. Mahoney

Steven R. Krucynski
Lynn James Blaggett
Kristen M. Scholtz
Lynn A. Steinberg

December 8, 2004

Shawn Norton
Ford Motor Company
Office of the General Counsel
Parklane Towers West - Suite 300
Three Parklane Boulevard
Dearborn, Michigan 48126-2568

John J. Dwyer
Huy Mark Dary

William J. Gillis
15 Foster Street
Quincy, MA 02269

445393
12/9/04

RE: State Farm Insurance Subrogation Claim
State Farm Insured: [REDACTED]
State Farm Claim #: [REDACTED]
Date of Loss: 02/29/2004
Type of Loss: Defective Product
Amount of Loss: \$21,009.51

Dear Mr. Norton:

This firm has been retained by State Farm Insurance Company ("State Farm") to represent them in regards to the above-referenced matter. We are now in a position to demand a settlement on behalf of our client/subrogee, State Farm, who insured the home of [REDACTED]. State Farm seeks reimbursement of \$21,009.51 for damages to the insured's home caused by your automobile that was defective that caused the damages.

The loss occurred at our insured [REDACTED] home on February 29, 2004 at approximately 2:00 a.m. [REDACTED] and her husband were asleep and heard the smoke detector go off. They went downstairs to the garage and discovered that their 2000 Ford expedition was on fire. They left the house and called the local fire department that responded and were able to put out the fire. The fire damaged the Ford Explorer and to their home.

State Farm contacted Consulting Service Transportation Technology to investigate the cause and origin of the fire. Consulting Service Transportation Technology's report indicated that a melted opening was visible on the driver's side of the hood and the burn patterns on the booster showed that the fire was on a plane equal to the master brake cylinder reservoir and cruise deactivation switch. The report further

Page 2
April 1, 2004

Linda R
Linda Rozier
Claim Representative
(770) 418-3227

State Farm Fire and Casualty Company

State Farm Insurance Companies



Subrogation Department
11380 Johns Creek Pkwy
Duluth, Georgia 30098-0001

July 28, 2004

Ford Motor Company, Attn: Shawn L. Norton
Parklane Towers West, Ste 300
Three Parklane Blvd
Dearborn, MI 48126-2568

RE: Claim Number: [REDACTED]
Date of Loss: February 29, 2004
Our Insured: [REDACTED]

RECEIVED AGO 3 2004

Dear Ms. Norton:

In response to your letter dated April 22, 2004, I have enclosed the requested information. Please contact me as soon as possible with your position on this matter.

Sincerely,

Linda Rozier

Linda Rozier
Claim Representative
(770) 418-3227

State Farm Fire and Casualty Company

495393
Cl 7/04

- F105
- Marietta, GA
- VIN
- purchased used - 3/22/02
(Franchise) 57,057



PRIVILEGED & CONFIDENTIAL

Office of the General Counsel

Ford Motor Company
Parklane Towers West
Suite 200
Three Parklane Boulevard
Dearborn, Michigan 48124-2664

April 22, 2004

State Farm Insurance
PO BOX 100081
Duluth, GA 30086-8381
ATTENTION: LINDA ROZIER

RE: Claimant: [REDACTED]
Your Claim #: [REDACTED]
DCL: 02-29-2004

Dear Ms. Rozier:

We acknowledge your recently submitted subrogation claim. In order to assist us 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.)

- 1. Attach your insured's statement with a complete description of the incident, including events that occurred prior to and subsequent to the loss.
- 2. A copy of the police and/or fire report.
- 3. Original color photographs of the vehicle's collision/fire damage & the alleged defective parts, from several different angles.
- 4. Original color photographs of the inside of the vehicle showing the steering wheel, dash and roof areas.
- 5. Original color photographs of the accident / fire scene from several different angles.
- 6. Attach a copy of your expert's report and the expert's original photographs.
- 7. Attach the repair estimate, repair order, or your total loss worksheet for the vehicle's damage and any losses associated with this incident, and copies of draft payments.
- 8. Attach the complete service history for the subject vehicle, including any tune-ups or oil changes.

Please answer the following in the space provided. If you need additional space, please use the back of the form;

- 9. What was the city and state of occurrence: Marietta, Georgia
- 10. The 17 digit vehicle identification number: 1FMRU1561Y [REDACTED]
- 11. What was the mileage at time of occurrence: could not be determined
- 12. What is the alleged defect: An electrical fault w/ the cruise control deactivation switch.
- 13. Has the alleged defective part been repaired or replaced? (circle one) Yes or **(No)**

Verastan North
6242 Blackacre Trail
Acworth, GA 30101

(770) 975-1107

- 14. What is the current location of the vehicle? _____
- 15. List all after market additions or modifications that were made to the vehicle:
None

- 16. Was the engine running? (circle one) Yes or No
- 17. Were the keys in the ignition? (circle one) Yes or No
- 18. Was this vehicle purchased new or used: Used

If purchased used, provide the date of purchase, mileage at the time of purchase, and from whom the vehicle was purchased. Purchased 3-23-02, mileage at time of purchase was 57,637, vehicle was purchased from Allen Vigil Ford

Once we are in receipt of the requested information, it will be reviewed and you will be notified of our decision 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 file. Please note that your vehicle will not be inspected until all the above information has been submitted and a determination 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 trial. Ford Motor Company has the right to inspect the vehicle and remove and test any component part that you claim to be defective, and to be presented with the vehicle and the subject component part(s) at the time of trial, should litigation ensue from this informal claim.

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 removed 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 insist that all components claimed to be defective are maintained and preserved for trial.

Sincerely,



Shawn L. Norton
Claims Analyst /
Litigation Assistant



Consulting Service

Transportation Technology

1184 Wind Hill Lane
Marietta, Ga. 30064
Telephone / Fax (770) 426-8173
or Toll Free (877) 328-3385
www.vehicleinvestigator.com

1.0 ASSIGNMENT

1.1 Client:



1.2 Subject:

2000 Ford Expedition

Serial # 1FMRU1581YL

Mileage # Could not be determined

1.3 Location:



Marietta, GA

1.4 Purpose:

Determine the cause of the fire

1.5 Date of Inspection:

March 8, 2004

2.0 Participating Personnel

2.1 Investigator:

Michael E. Bresnock- Consultant

Transportation Technology

Consulting Service

Transportation Technology

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Marietta, Ga. 30064
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or Toll Free (877) 328-3385
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3.0 EXAMINATION OF VEHICLE

3.1 The residence at [REDACTED] Marietta, GA was damaged by fire on February 29, 2004. During an interview with the homeowner, [REDACTED] she indicated that the family was alerted to the fire by a smoke detector. Upon further investigation it was determined that the Ford Expedition, which had been parked inside of the garage, was on fire. The Cobb County Fire Department responded and was able to bring the fire under control. A second vehicle, a Ford Explorer, also parked in the garage sustained only smoke damage. At the time of our investigation, both vehicles had been moved outside of the garage and were situated on the driveway (Photo #1).

3.2 There were accumulations of soot at the parting seam between the garage doors and the framing (Photo #2, #3). A single burn pattern was noted on the garage ceiling (Photo #4). The burn pattern corresponded with the location where the Ford Expedition would have been parked.

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3.3 The exterior surfaces of the vehicle were photographed to document its condition at the time of the investigation (Photo #6, #8, #7, #8). The vehicle identification number was recorded from a label on the driver's side front door opening (Photo #9). The interior of the vehicle sustained some damage when the plastic components melted and dropped down onto the seat coverings and console area (Photo #10). A view from the passenger's side front door opening showed a similar drop down condition along with some melting of the upper dash pad (Photo #11). The midship and rear cargo sections of the interior were not affected by the fire (Photo #12, #13). There were no indications of after market accessory installations on the dash (Photo #14).

3.4 A melted opening was visible on the driver's side of the hood (Photo #15). Burn patterns on the brake booster showed that the fire was on a plane equal to the master brake cylinder reservoir and cruise control deactivation switch (Photo #16). Additional damage inside of the engine compartment indicated the fire spread from

EXPERT RPT.

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a location near the brake master cylinder and expanded outward from that location melting some of the rubber hoses and oxidizing some of the brackets in the surrounding area (Photo #17). During an examination of the engine compartment, one section of the cruise control deactivation switch was found near the steering shaft (Photo #18). There was some melted copper inside of the cruise control deactivation switch contact remains (Photo #19). After photographing the deactivation switch remains they were placed in an evidence bag, which was labeled with the vehicle identification number and date of the inspection (Photo #20, #21, #22). The evidence was transferred by [REDACTED] to Transportation Technology via a transfer of evidence form (Photocopy #1).

4.0 CONCLUSIONS

4.1 This preliminary non destructive inspection of the insured's vehicle indicated that the fire originated on the driver's side of the engine compartment. Additional testimony of the origin location was provided by [REDACTED] who observed the

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location of the fire while the vehicle was parked inside of the garage and actively burning. The location of the burn pattern on the ceiling of the garage also lends credence to the location of the fire to be on the left side of the engine compartment. Burn patterns found inside of the engine compartment indicated that the fire was upper level and centered around the cruise control deactivation switch. The body of the switch was mounted to the front portion of the brake master cylinder. The contact portion of the switch had dropped into the engine compartment and was retrieved during our investigation. The security and safe keeping of the switch remains will be assumed by Transportation Technology.

4.2 A review of the cruise control wiring schematic indicates the brake pressure switch (cruise control deactivation switch) is constantly supplied with an electrical potential, which passes through the switch and into the speed control servo (Photocopy #2). The melted copper fragments inside of the deactivation switch remains indicated an electrical fault occurred, which elevated the temperature of the

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copper to its melting point. The visual inspections performed during this fire investigation were non destructive in nature. An additional inspection and possibly more tests will be needed to provide a comprehensive conclusion, which will eliminate all other causes of this fire. The remains of the cruise control deactivation switch were retained as evidence due to the possibility of them being lost or damaged during transportation or towing to a salvage facility.

Consulting Service
Transportation Technology

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Marietta, Ga. 30064
Telephone (770) 426-6173
FAX (770) 426-6173
PAGER (404) 342-7518

Investigation Data Sheet

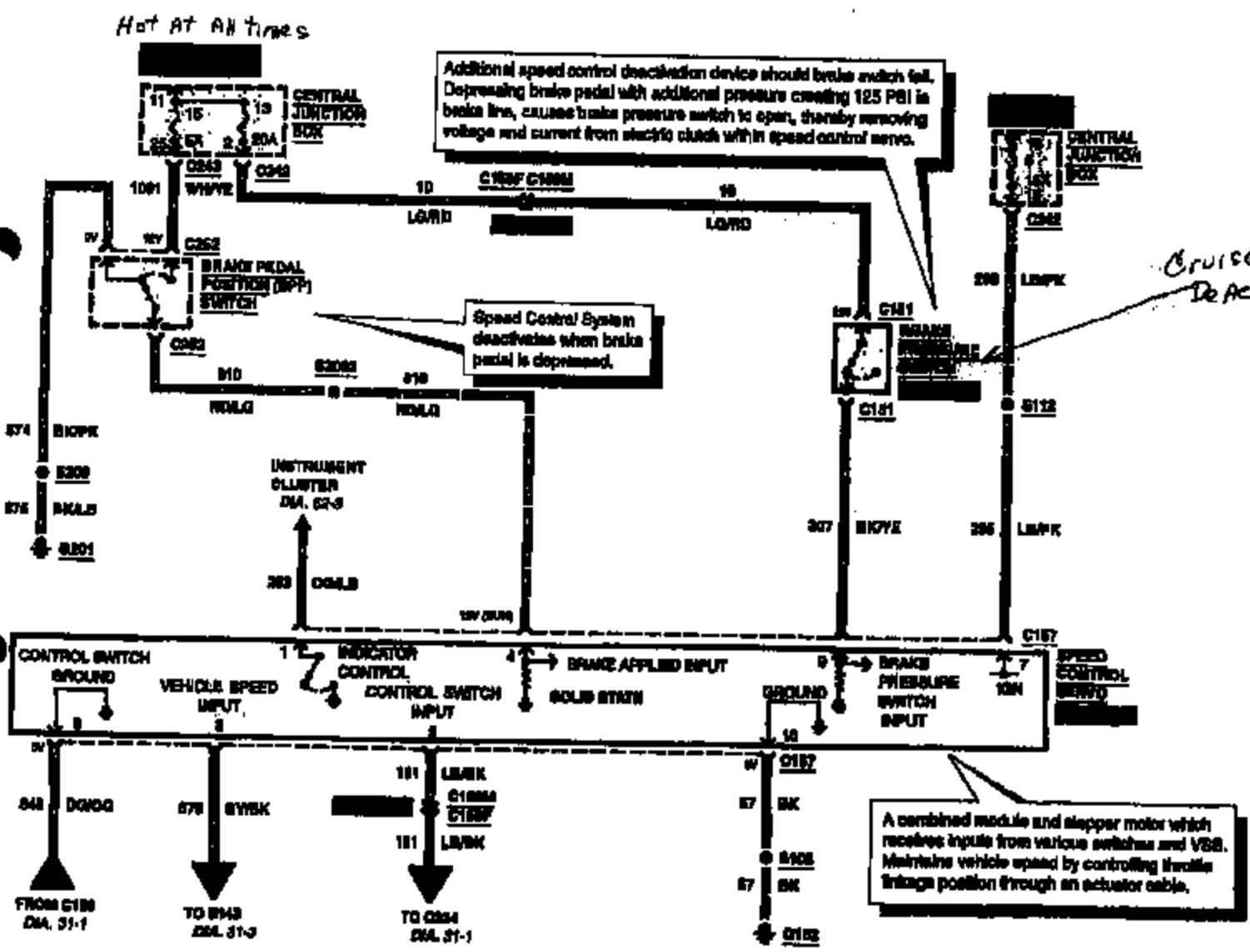
DATE:	MONTH: 3 DAY: 8 YEAR: 04
VEHICLE OWNER	[REDACTED]
VEHICLE MAKE	FORD Expedition
VEHICLE MANUFACTURER	FORD MOTOR COMPANY
VEHICLE SERVICE #	1FMRU1561VL [REDACTED]
FILE REFERENCE NUMBER	11L-109-894
* CUSTODY OF THE FOLLOWING ITEMS HAS BEEN TRANSFERRED TO TRANSPORTATION TECHNOLOGY:	
ITEM LIST:	Cruise Control De-Activation Switch (Upper Section w/ Elec Contacts)
DESCRIPTION:	Fire Damaged
TRANSFERRED BY:	[REDACTED] TITLE: Vehicle Owner
TRANSFERRED TO:	Michael E. Brennan TITLE: Consultant Transportation Technology
<small>Note: Label or tag items</small>	

Photocopy # 1

NOTES:

Photocopy #2

Copyright © 2003, A.I.D.A.T.A 7.25 Page 1
1000 Ford Truck Expedition 2WD V8-281 4.6L SOHC VIN W SE1



PE84-878 C 0819

Photos

Consulting Service

Transportation Technology

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or Toll Free (877) 328-3385
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Photograph: #1

Transportation Technology : 24045

Date Taken: March 8, 2004

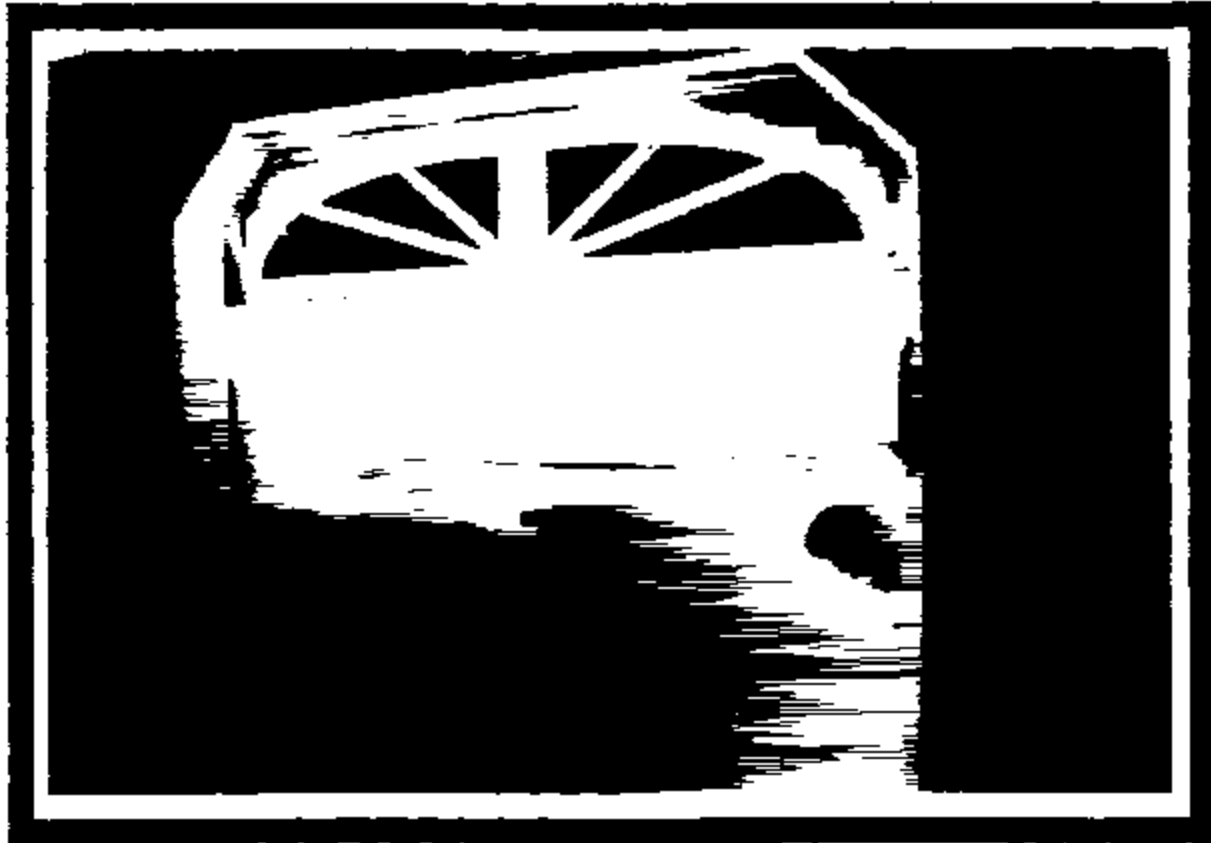
Description of Subject: [REDACTED]

Note: Ford vehicles found on the driveway outside of the garage.

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or Toll Free (877) 328-3385
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Photograph: #2

Transportation Technology : 24045

Date Taken: March 8, 2004

Description of Subject: Garage Door (left side)

Note: Accumulation of soot at the parting seam between the door and framework.

Consulting Service

Transportation Technology

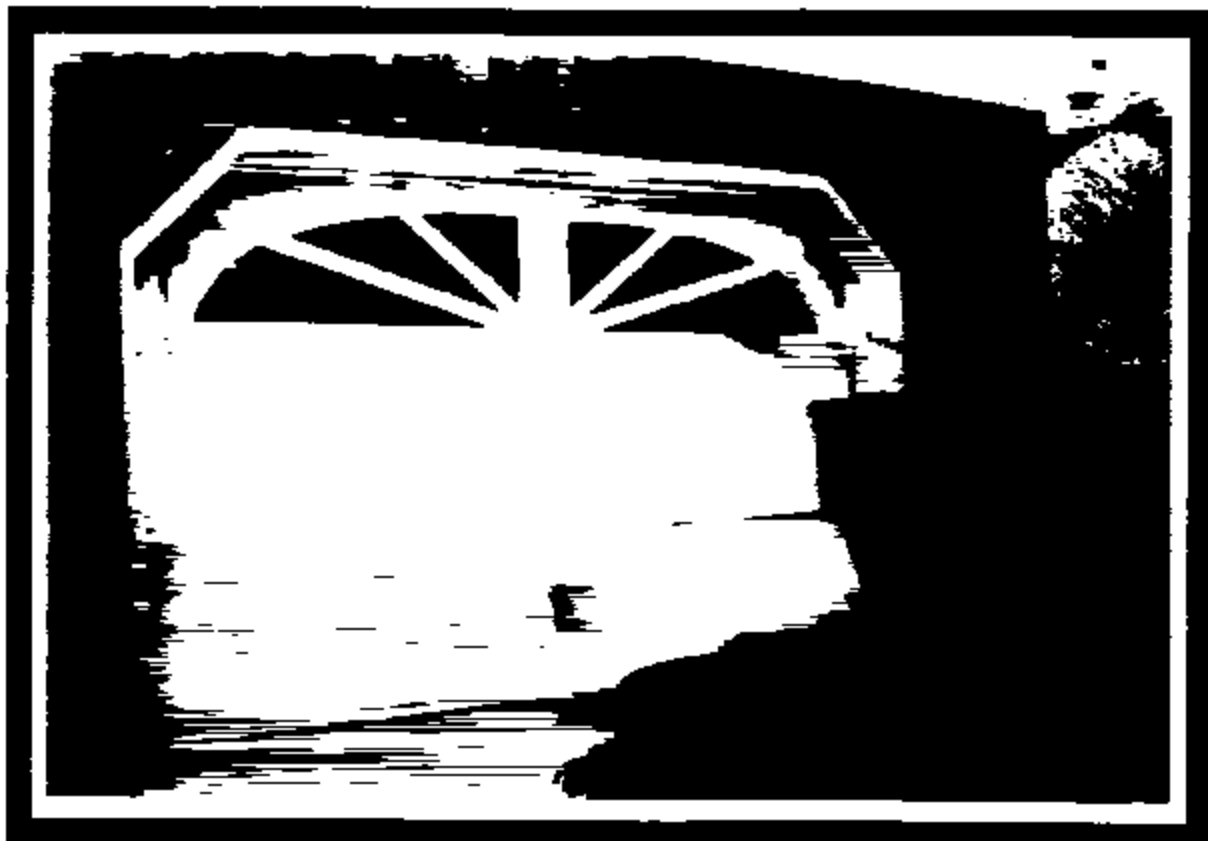
1184 Wind Hill Lane

Marietta, Ga. 30064

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or Toll Free (877) 328-3385

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Photograph: #3

Transportation Technology : 24045

Date Taken: March 8, 2004

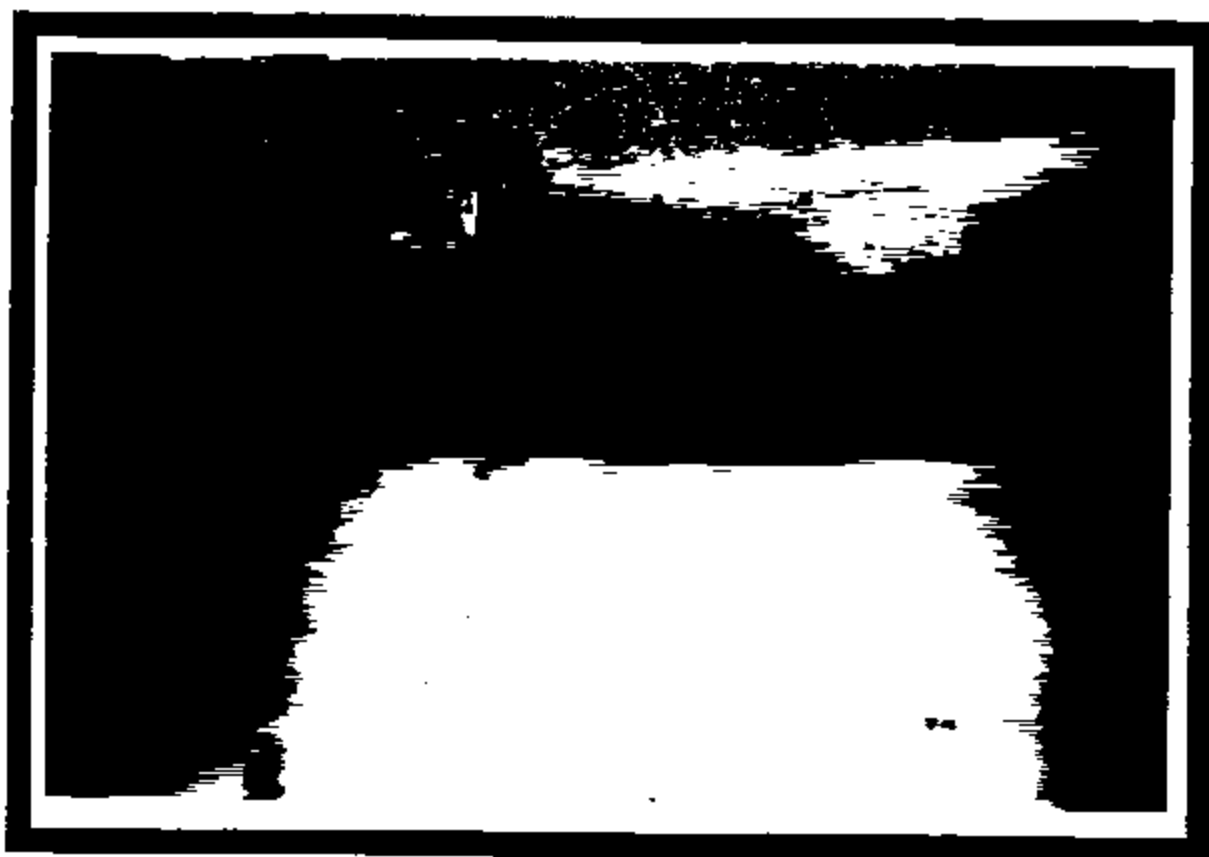
Description of Subject: Garage Door (right side)

Note: Accumulation of soot at the parting seam between the door and framework.

Consulting Service

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Marietta, Ga. 30064
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Photograph: #4

Transportation Technology : 24045

Date Taken: March 8, 2004

Description of Subject: Garage (right side stall)

Note: Burn pattern on ceiling.

Consulting Service

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Photograph: #5

Transportation Technology : 24045

Date Taken: March 8, 2004

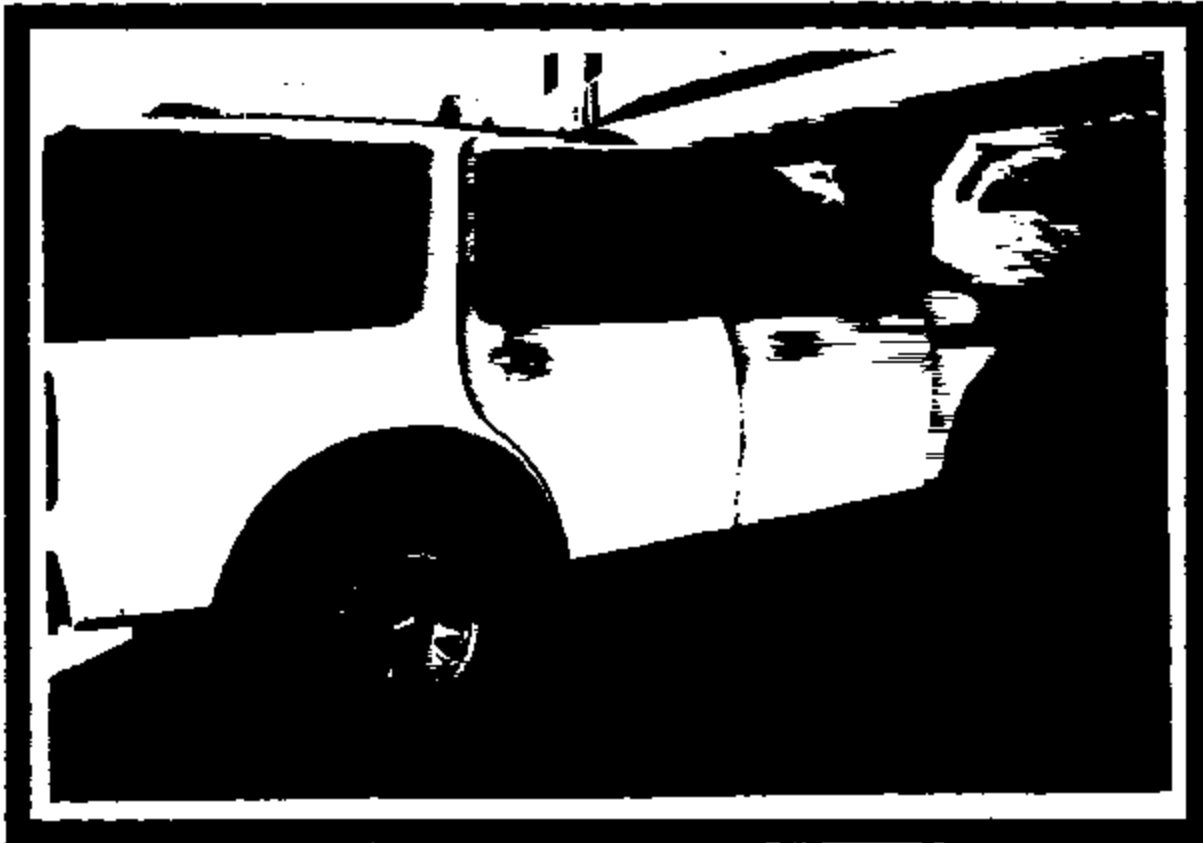
Description of Subject: 2000 Ford Expedition

Note: Front view showing fire damaged area of hood and windshield.

Consulting Service

Transportation Technology

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or Toll Free (877) 328-3385
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Photograph: #8

Transportation Technology : 24045

Date Taken: March 8, 2004

Description of Subject: 2000 Ford Expedition

View of passenger's side.

Consulting Service

Transportation Technology

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or Toll Free (877) 328-3385
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Photograph: #7

Date Taken: March 8, 2004

Description of Subject: 2000 Ford Expedition

Transportation Technology : 24045

Rear view.

Consulting Service

Transportation Technology

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or Toll Free (877) 328-3385
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Photograph: #8

Transportation Technology : 24045

Date Taken: March 8, 2004

Description of Subject: 2000 Ford Expedition

View of driver's side.

Consulting Service

Transportation Technology

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Marietta, Ga. 30064
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Photograph: #9

Transportation Technology : 24045

Date Taken: March 8, 2004

Description of Subject: Driver's Side Front Door Opening

Note: Location from which VIN and build data were recorded.

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Photograph: #10

Transportation Technology : 24043

Date Taken: March 8, 2004

Description of Subject: Interior (front)

Note: Melted plastic hanging from the interior front overhead.

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Photograph: #11

Transportation Technology : 24045

Date Taken: March 8, 2004

Description of Subject: Interior (from passenger's side front)

Note: Melted section of the dash pad cover.

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Photograph: #12

Transportation Technology : 24045

Date Taken: March 8, 2004

Description of Subject: Mid-Ship Seating (from left side)

Note: No fire damage.

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Photograph: #13

Transportation Technology : 24048

Date Taken: March 8, 2004

Description of Subject: Mid-Ship Seating (from right side)

Note: No fire damage.

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Photograph: #14

Transportation Technology : 24045

Date Taken: March 8, 2004

Description of Subject: Dash

Note: Original radio and no indications of after market accessory installations.

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Photograph: #15

Transportation Technology : 24045

Date Taken: March 8, 2004

Description of Subject: Hood Panel

Note: Melted opening in hood panel.

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Photograph: #16

Transportation Technology : 24045

Date Taken: March 8, 2004

Description of Subject: Engine Compartment (through burn opening on hood panel)

Note: Location of brake master cylinder and brake booster. Also note: burn pattern on brake booster shell.

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Photograph: #17

Transportation Technology : 24045

Date Taken: March 8, 2004

Description of Subject: Engine Compartment (through opening in hood panel)

Note: Melted upper level area of radiator hose and oxidized brackets.

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Photograph: #18

Transportation Technology : 24045

Date Taken: March 8, 2004

Description of Subject: Engine Compartment

Note: Location where deactivation switch remains were found.

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Photograph: #19

Transportation Technology : 24045

Date Taken: March 8, 2004

Description of Subject: Cruise Control Deactivation Switch

Note: Remains which were found in the engine compartment.

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Photograph: #20

Transportation Technology : 24045

Date Taken: March 8, 2004

Description of Subject: Cruise Control Deactivation Switch (contact portion)

Note: Beaded copper inside the contact portion of the switch.

FE84-878 C 0840

Consulting Service

Transportation Technology

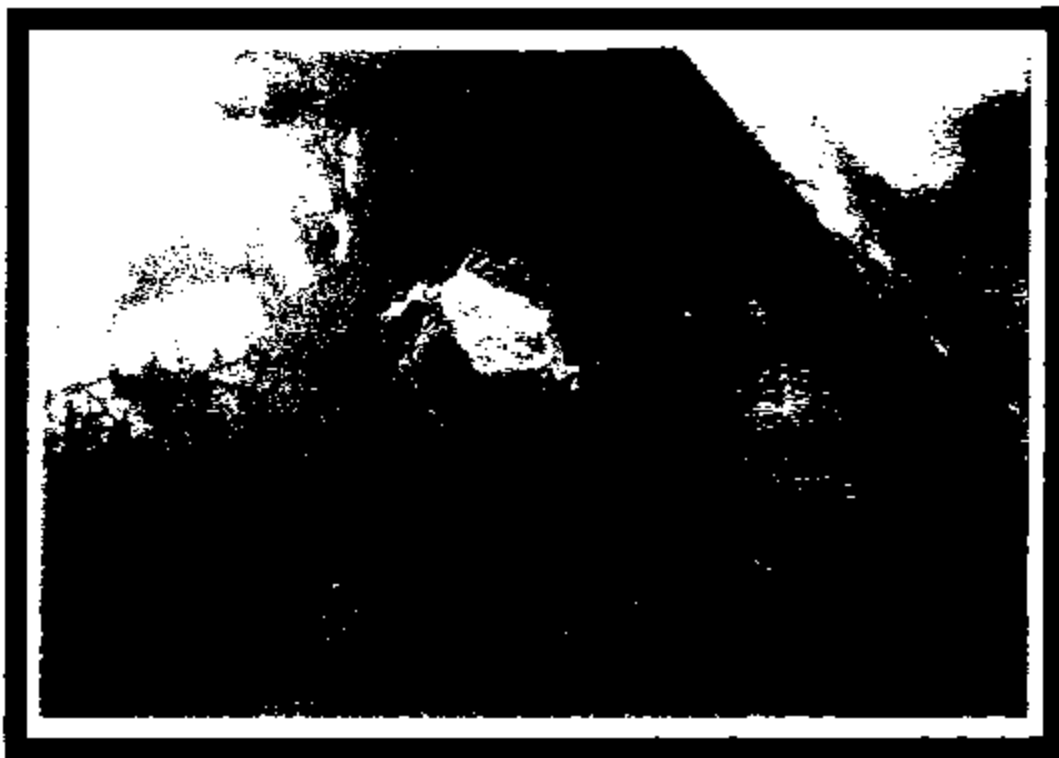
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Photograph: #21

Transportation Technology : 24045

Date Taken: March 8, 2004

Description of Subject: Cruise Control Deactivation Switch (alternate view)

Note: Remains which were found in the engine compartment.

FEB4-078 C 8841

Consulting Service

Transportation Technology

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Photograph: #22

Transportation Technology : 24045

Date Taken: March 8, 2004

Description of Subject: Cruise Control Deactivation Switch

Note: Placed in an evidence bag which was labeled with the VIN number and the date of the inspection.

FE84-878 C 8843

Hello operator, this is Jennifer Doughter, in the North Marietta State Farm® Claims Office.
Taking a recorded statement from § [REDACTED] regarding claim number [REDACTED]

Q. And [REDACTED] can you please confirm that I do have your permission to record this statement?

A. Yes.

Q. And, in addition, can you please state your entire name, your address, and your social security number, for...

A. Sho...

Q. Oh, go ahead.

A. [REDACTED] that's Marietta, [REDACTED] that's Georgia. Um, social is [REDACTED]

Q. Okay, and I'm just gonna ask you a few questions regarding the, the vehicle fire that occurred on February 29th, 2004. Can you give me a, a description, a, a complete description of the incident, and include any events that occurred before or after the fire itself?

A. Okay.

Q. If you can just start at the beginning of the day, possibly.

A. Okay, uh, the beginning of the day, I guess we drove the vehicle earlier that evening. Parked the vehicle at about maybe 9:00 that evening, in the garage. The key, no keys were in it, the engine wasn't running. Um, went to sleep, about 10:30, 11:00. The fire, smoke alarm woke us up, close to 2:00 that morning. And my husband went downstairs in the garage, to see that the fire, the truck was on fire. Um, after that we left the house and called the fire department.

Q. Okay, can you tell me, you, you don't have to tell me where you necessarily went that evening, but do you know about how many miles you might have driven?

A. Not very far. How far did you go that evening Val? Weren't you like, you went around by Tony's(sp?) house maybe, you didn't go far. Home Depot, okay, Home Depot, which is in Austell...

Q. Okay.

A. Which is adjacent to Marietta...

Q. Yeah.

A. Which is not even what...

Statement Of: [REDACTED]
Cla [REDACTED]

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- Q. 10
A. Five miles?
- Q. Five to 10 miles max.
A. Yeah, um hum.
- Q. Okay, and did you take a, a normal route on the roads? Or, was there any off-roading or...
A. No.
- Q. Anything unusual?
A. Normal roads.
- Q. Okay, and how about after the loss, once you'd called the fire department, was there, what, what did you all do, right afterwards?
A. After we called the fire department?
- Q. Um hum.
A. We, just, waited across the street at our neighbor's house, until they did, what ever they had to do in the house, and with the vehicle.
- Q. Okay.
A. So it was after they, um, sear- you know, searched the vehicle and the house, and everything, and make sure everything was okay, then we came back home and they pulled the vehicle out of the garage, into the driveway.
- Q. Okay, and did you know, when the, when the fire started, did you know what the cause was?
A. No, we didn't know. Huh uh.
- Q. Okay, does the fire report state what the cause was?
A. Um, let me look at it. I don't think the fire report, 'cause they, you know, it was 2:00 in the morning...
- Q. Um hum.
A. It was dark, they couldn't really see. Let me see if I can find it. I don't think it stated the exact cause...
- Q. Okay.
A. They just verbally said what they thought it might be, but they didn't right it on the report of course.

Statement Of: [REDACTED]

Claim: [REDACTED]

Page 2

PE04-078 C 8845

- Q. What did they think it might be?
A. Um, electrical.
- Q. Okay.
A. Um, the fire report lets see, no it's not on here, no.
- Q. That's okay, I'll, I'll have you, can you send me a copy of that?
A. Um hum, um hum.
- Q. Okay, and also, just if you can, if you can verify that you'll be able to do the, these following items. Can you send a complete service history for the vehicle?
A. Wh...
- Q. Regarding any tune-ups or oil changes?
A. The paper work that we had was in the vehicle, in the glove compartment.
- Q. Okay.
A. Um, generally we got it serviced, at either the Ford in um, Jonesboro, or the Ford in Marietta.
- Q. Jonesboro...
A. But, like I said, every time they gave us record of what was done we kept it in the car.
- Q. Okay, but we could possibly go back to the Ford dealership...
A. Um hum.
- Q. And, and get that information?
A. One of those two, right.
- Q. Okay, you, you don't have to do that right now, we, but, I'm just so we know where we...
A. Okay.
- Q. Can get that information.
A. Okay.
- Q. And do you know of any after market additions or modifications that were made to the vehicle?
A. There were none.
- Q. Okay, it was the same stereo?

Statement Of: [REDACTED]
Claim: [REDACTED]

Page 3

A. Um hum.

Q. The, all the wheels were the same?

A. Um hum.

Q. Okay, there was nothing done to it at all?

A. No, no, huh uh.

Q. Okay, okay, and was the engine running at the time of the loss?

A. No.

Q. And you, you mentioned that the keys were out of the ignition?

A. Right.

Q. Okay, did you purchase that vehicle new or used?

A. It was used.

Q. Okay, can, will you be able to find the date of the purchase, and possibly the mileage, and the information. Just, any information surrounding who you purchased it from?

A. Yes.

Q. Okay, I'll, I'll have you send that to me as well. Is there anything else you'd like to address to this statement?

A. No.

Q. Okay, I'm gonna go ahead and turn off the recorder now at this time. Again, operator, this is concerning, file [REDACTED] [REDACTED] can you again, verify that I had your permission to take this statement?

A. Yes.

Q. Okay, I'm gonna turn off the recorder.

TERD/L109894.712

Statement Of [REDACTED]

Claim: [REDACTED]

Page 4

PE24-878 C 8847

Photos

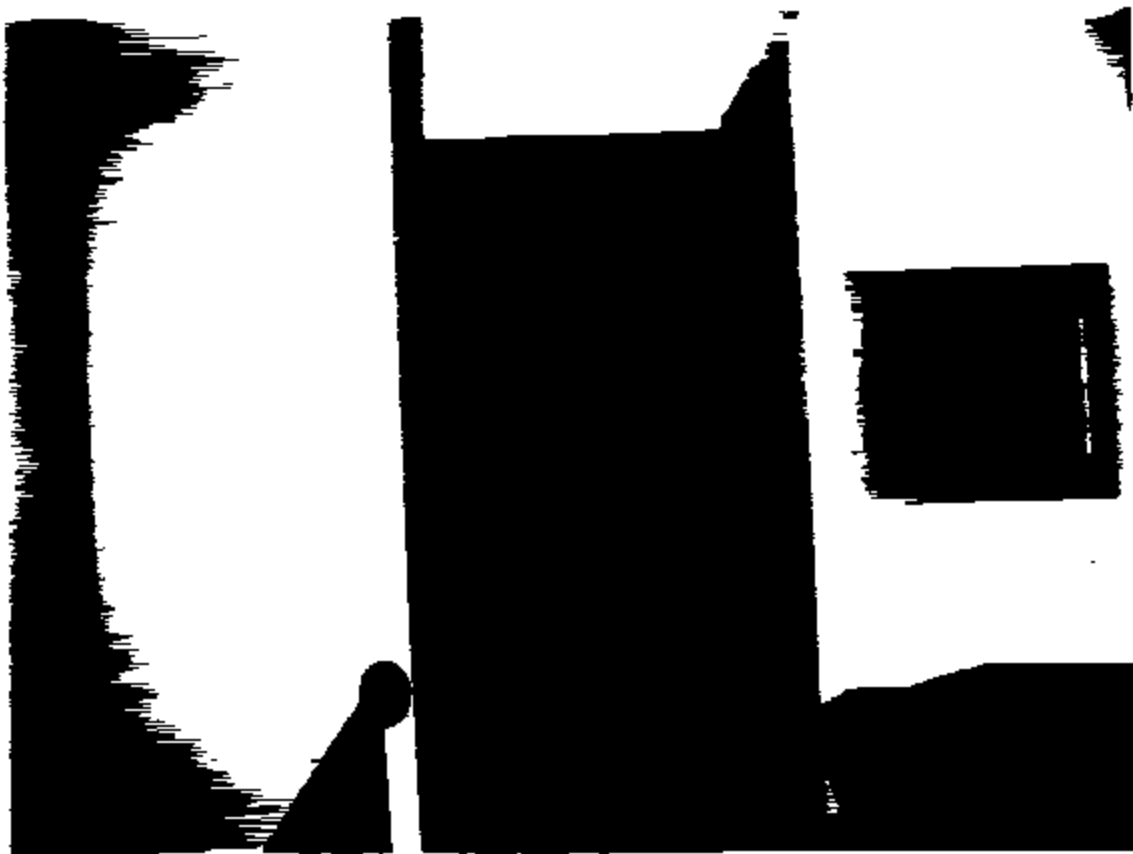
PE84-278 C 0849



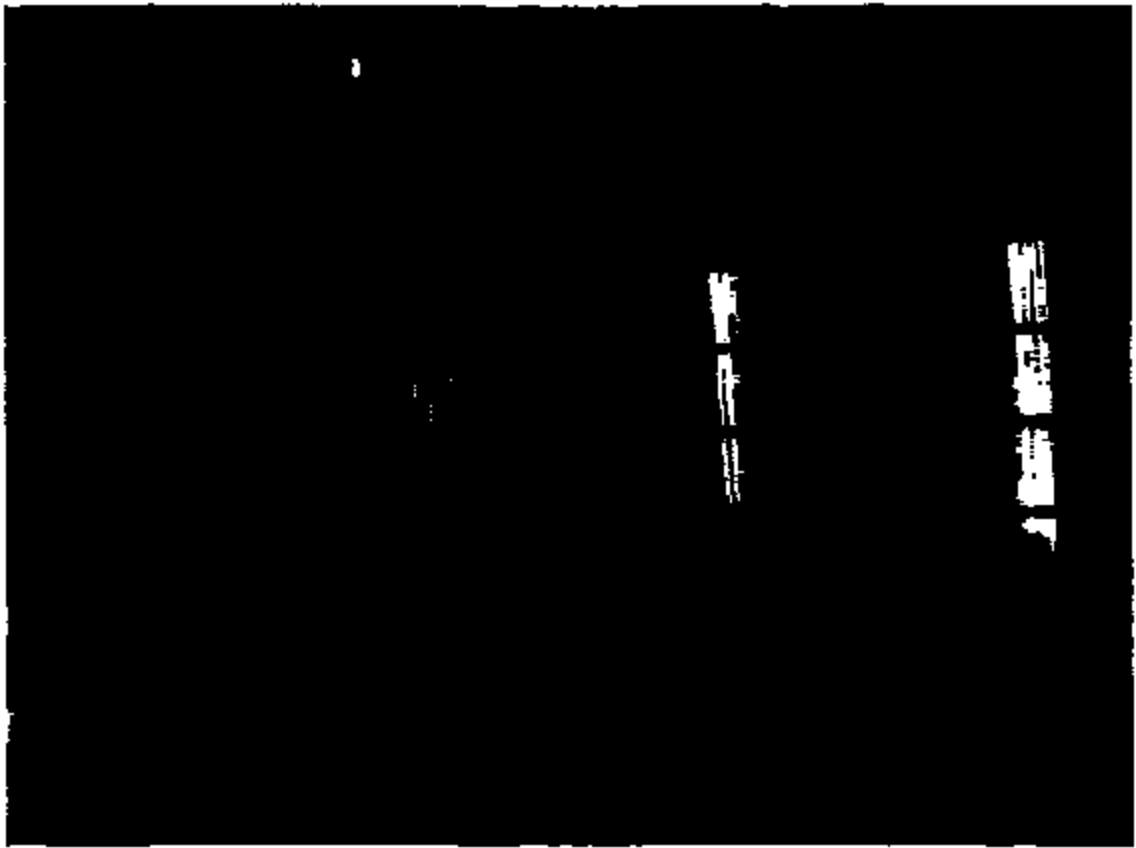




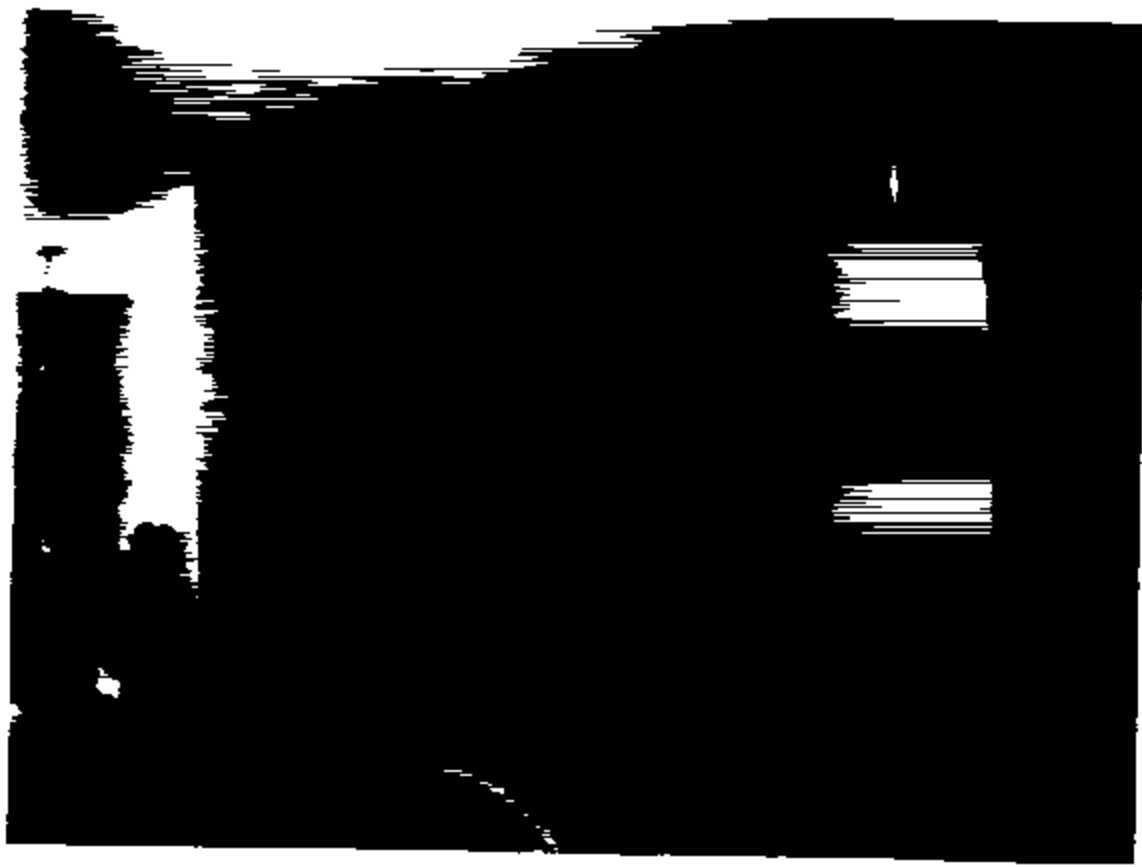


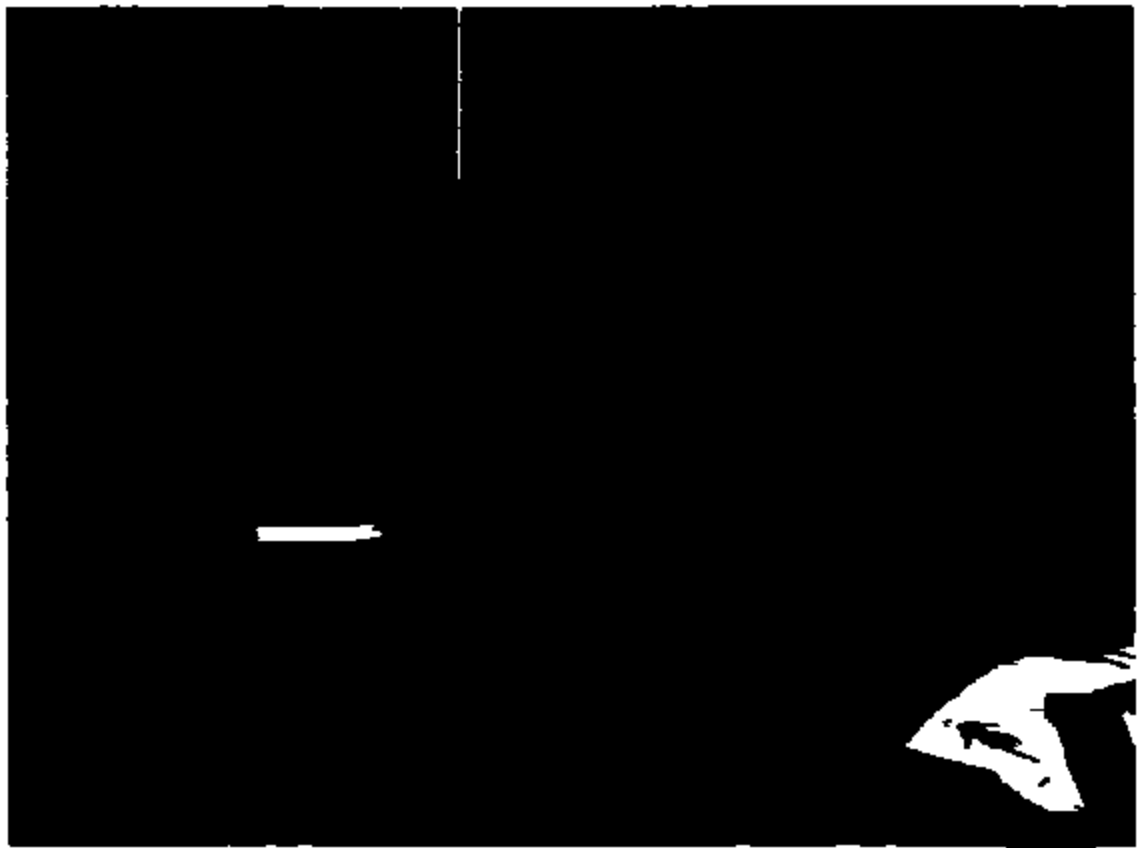


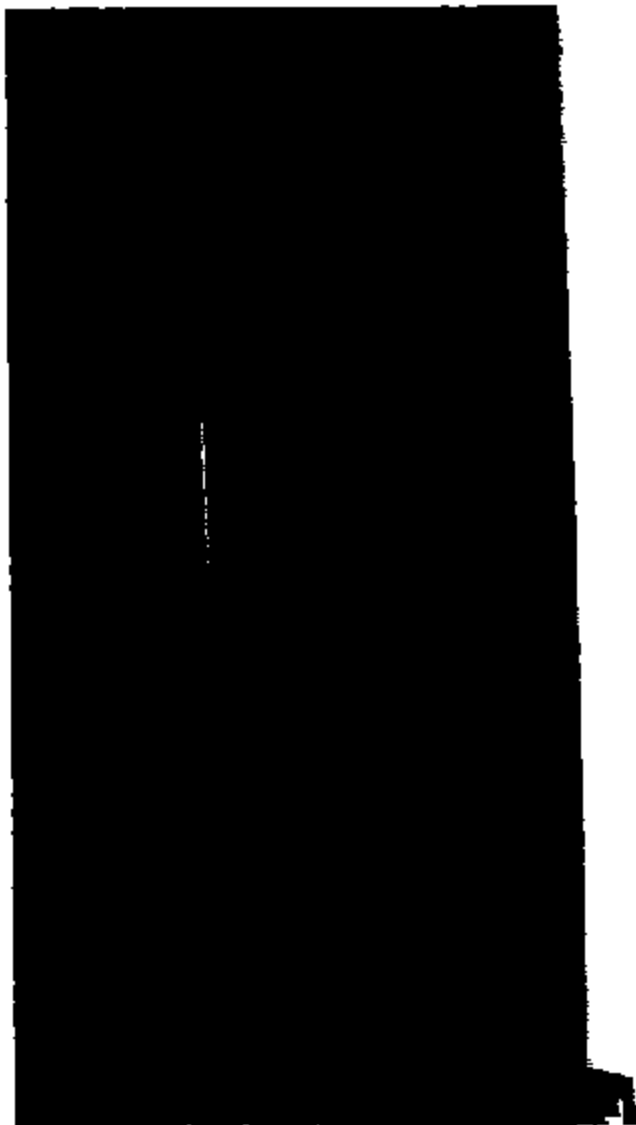
FD-302 (Rev. 11-27-70) C 8884





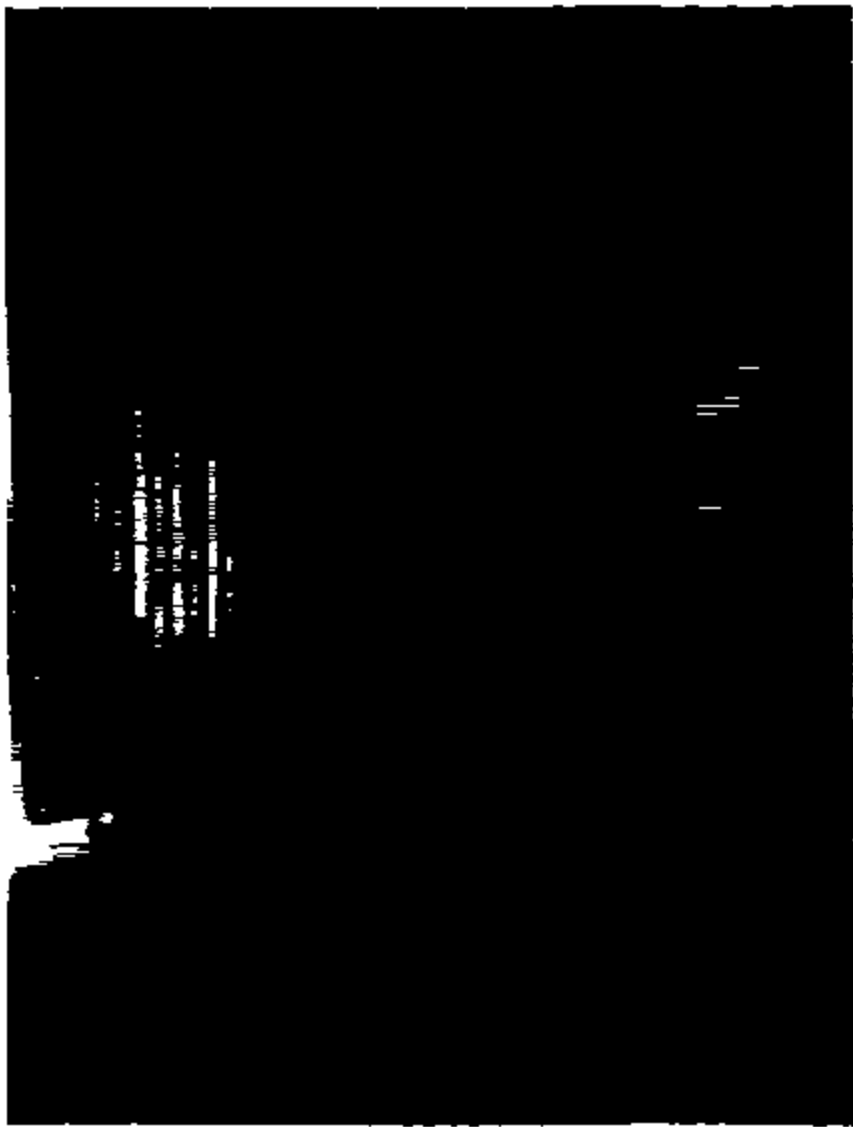








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PEB4-078 C 0062





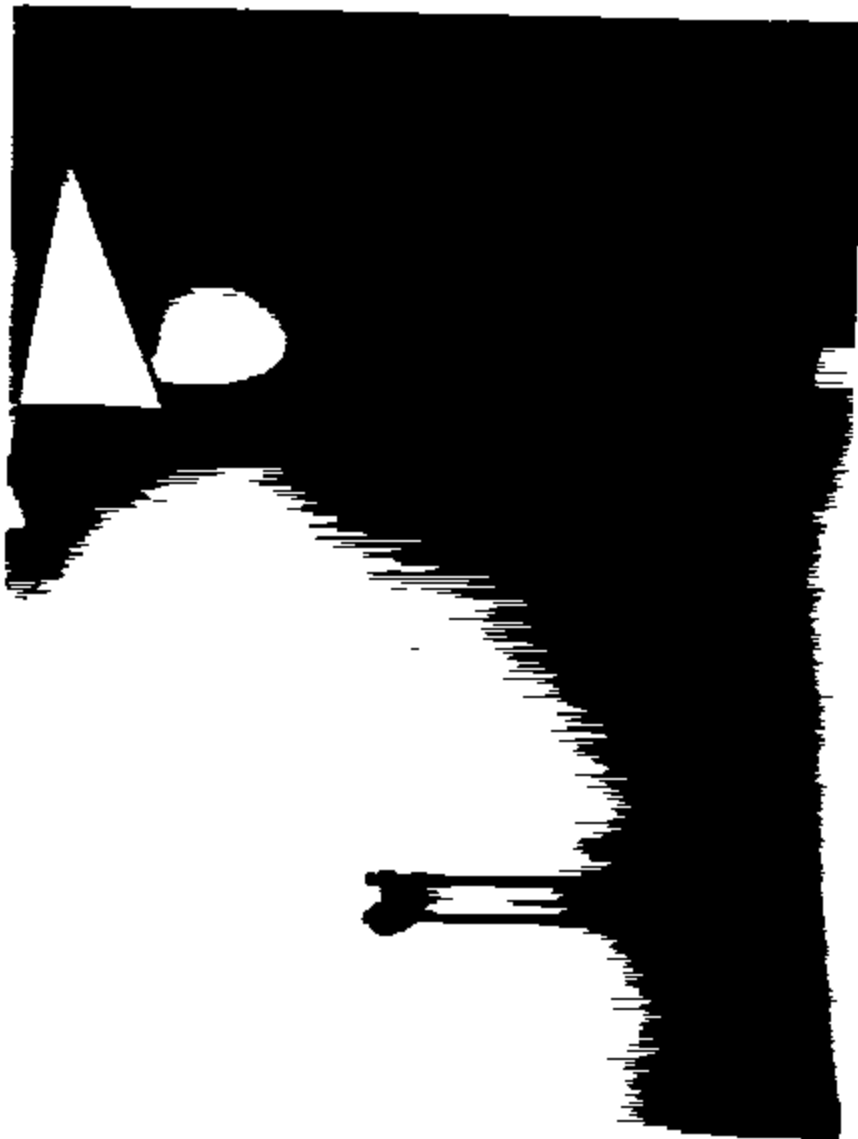


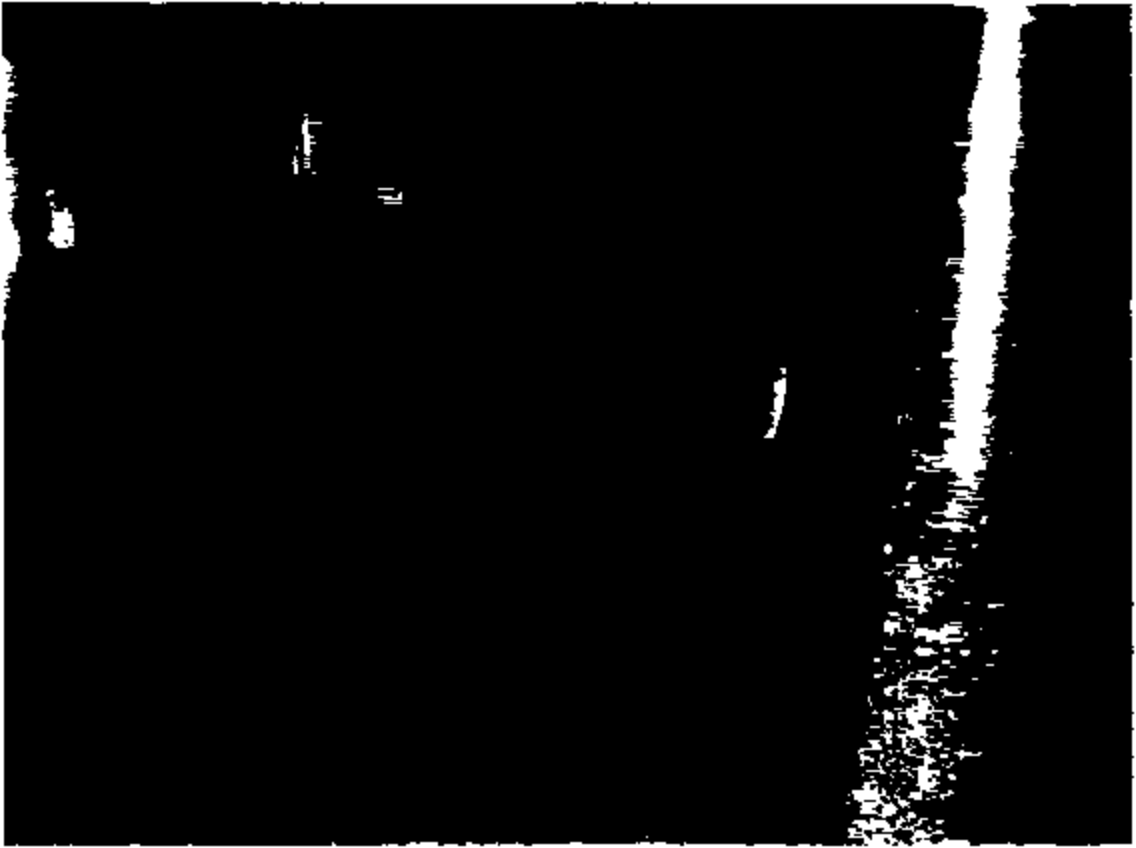
PEB4-878 C 0585





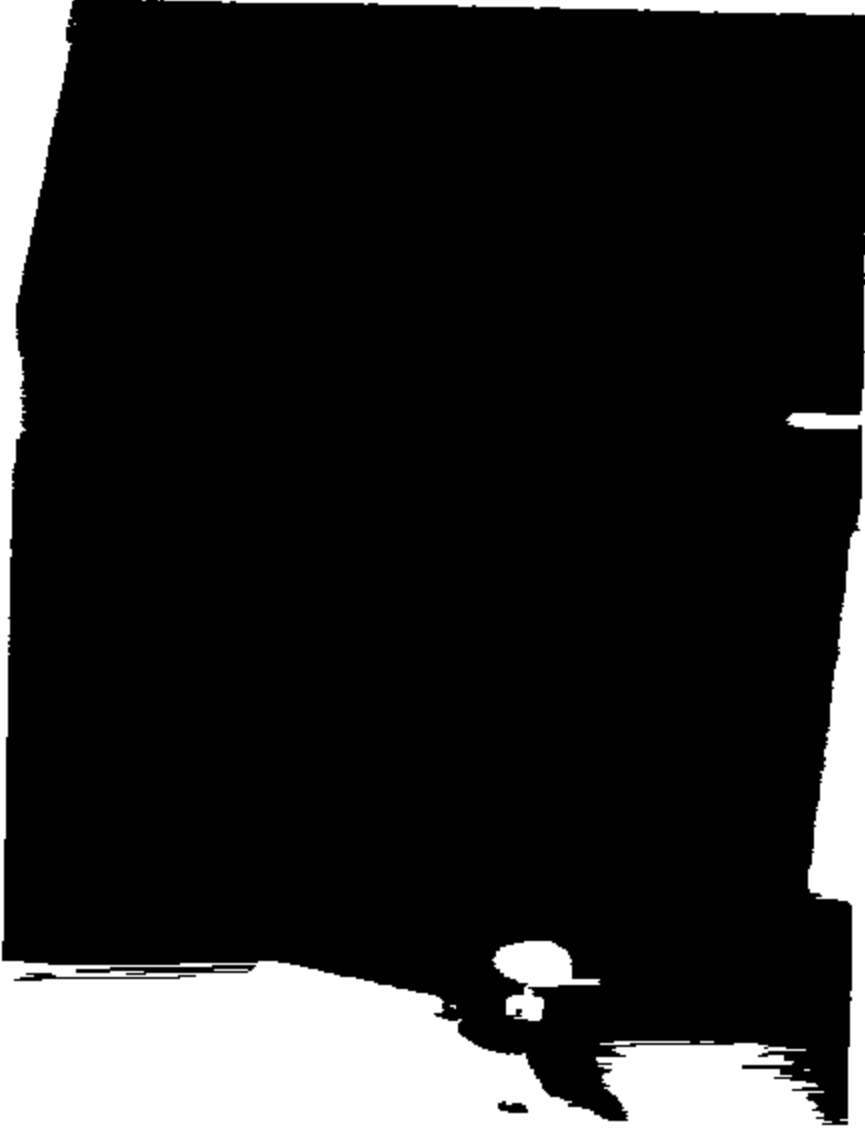














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