

PE04-078

FORD

1/28/2005

ATTACHMENT F

BOOK 8 OF 12

PART 1 OF 6



PE04-078 C 2884

ELLIOTT & ELLIOTT, L.C.

ATTORNEYS AT LAW

Timothy G. Elliott
Stephanie A. Elliott

P.O. Box 27268
Overland Park, Kansas 66225

(913) 491-2855 (Phone)
(913) 327-7732 (Fax)

Tim@elliott-lawfirm.com
www.elliott-lawfirm.com

June 19, 2004

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

RECEIVED JUN 23 2004

Re: Amco's Insureds: [REDACTED]
Amco's Claim No.: [REDACTED]
Date of Loss: 9/24/03
Amount of Loss: \$12,234.50 (including \$250.00 deductible)

Dear Mr. Norton:

This will acknowledge receipt of your letter dated April 13, 2004, in regard to the captioned subrogation claim.

We have enclosed the following to assist you in your investigation:

1. Copy of your letter of April 13, 2004, with the applicable items completed.
2. Copy of letter dated April 23, 2004, from our client's representative and copies of color photographs.
3. Copies of color photographs of TFS report.
4. Copies of color photographs of vehicle at salvage pool.
5. Copy of payment record.
6. Copy of letter dated June 10, 2004, from client's representative indicating tape of insured's statement could not be transcribed.

Please advise us of your company's position in this regard at your earliest convenience. If you would like to inspect the vehicle, please advise us of the day and time of the inspection so we can request our client to have a representative present. Please feel free to contact me if you have any questions, or wish to further discuss this file.

Sincerely,

ELLIOTT & ELLIOTT, L.C.


Timothy G. Elliott

Enclosures

cc: Christie Watson, Amco
William & Sandra Wheeler

- Vehicle only -
Christie

Girard, KS
- 531461 (M)
WSB 4/5/99

PE94-878 C 2005

RECEIVED

APR 18 2004



Office of the General Counsel

PRIVILEGED & CONFIDENTIAL

Ford Motor Company
Parklane Towers West
Suite 800
Three Peridene Boulevard
Dearborn, Michigan 48124-3568

April 13, 2004

Elliott A Elliott, LC
PO BOX 27288
Overland Park, Kansas 66225
ATTENTION: TIMOTHY ELLIOTT

RE: Claimant: [Redacted]
Your Claim #: [Redacted]
DOL: 09-24-2003

Dear Mr. Elliott:

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.)

Need
Need another
set
4 pages
Pisport

- 1. Attach your insured's statement with a complete description of the incident, including events that occurred prior to and subsequent to the loss. LR0 #2284 Side B #3
- 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 that estimate.
- 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: Crawford Township, ^{Strand,} Kansas
- 10. The 17 digit vehicle identification number:
NA
- 11. What was the mileage at time of occurrence: 53,461
- 12. What is the alleged defect: Shorts in battery feed cable
See Technical Forensic Services, LLC report date 10/29/03 Component Failure / Fire Analysis

13. Has the alleged defective part been repaired or replaced? (circle one) Yes No
14. What is the current location of the vehicle? Charlotte, Selmae Pool (620) 431-7778
15. List all after market additions or modifications that were made to the vehicle:
Stock # 9072245

None known

16. Was the engine running? (circle one) Yes No
17. Were the keys in the ignition? (circle one) Yes 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: ~ 3/03, ~ 47 K,

1st National Bank Girard (620) 724-6111

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



RECEIVED
APR 29 2004

APRIL 23, 2004

TIMOTHY G ELLIOTT
ELLIOTT & ELLIOTT
CORPORATE WOODS BLDG 12
10975 BENSON ST STE 570
OVERLAND PARK KS 66210

RE: AMCO INSURANCE COMPANY
VS: FORD MOTOR COMPANY, ATTN: DEPT
Our Insured: [REDACTED]
Our File Number: 15D64822 AXA 0012413834
Your File Number:

Dear TIMOTHY G ELLIOTT :

PLEASE NOTE THE ENCLOSED INFORMATION THAT YOUR OFFICE HAD REQUESTED.
PLEASE ALSO NOTE THAT I HAVE REQUESTED FROM OUR DICTATION UNIT A COPY
OF THE INSURED'S STATEMENT. AS SOON AS I GET IT BACK I WILL ROUTE A
COPY TO YOU.

Respectfully,

Christie Watson

CHRISTIE WATSON
SENIOR RECOVERY REPRESENTATIVE

AMCO INSURANCE COMPANY
1100 LOCUST DEPT 5595
DES MOINES IA 50391-5595
(515)-508-5740
(800)-879-6707--- ext. 5740

enclosure
cc

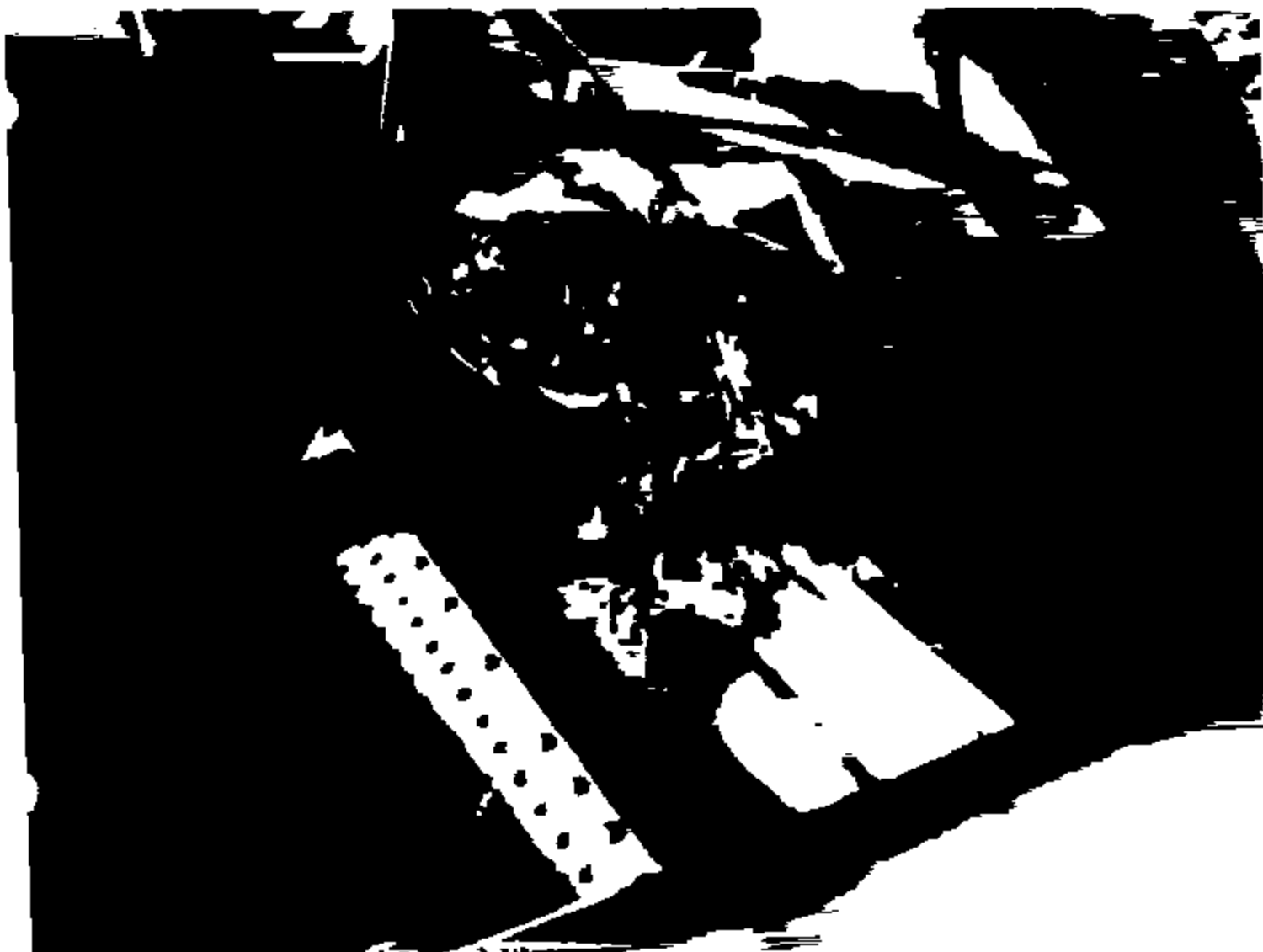
15D64822 AXA 0012413834

A04





9 25 2003

















REGAN

LEWIS

POST 25

9 25 2003

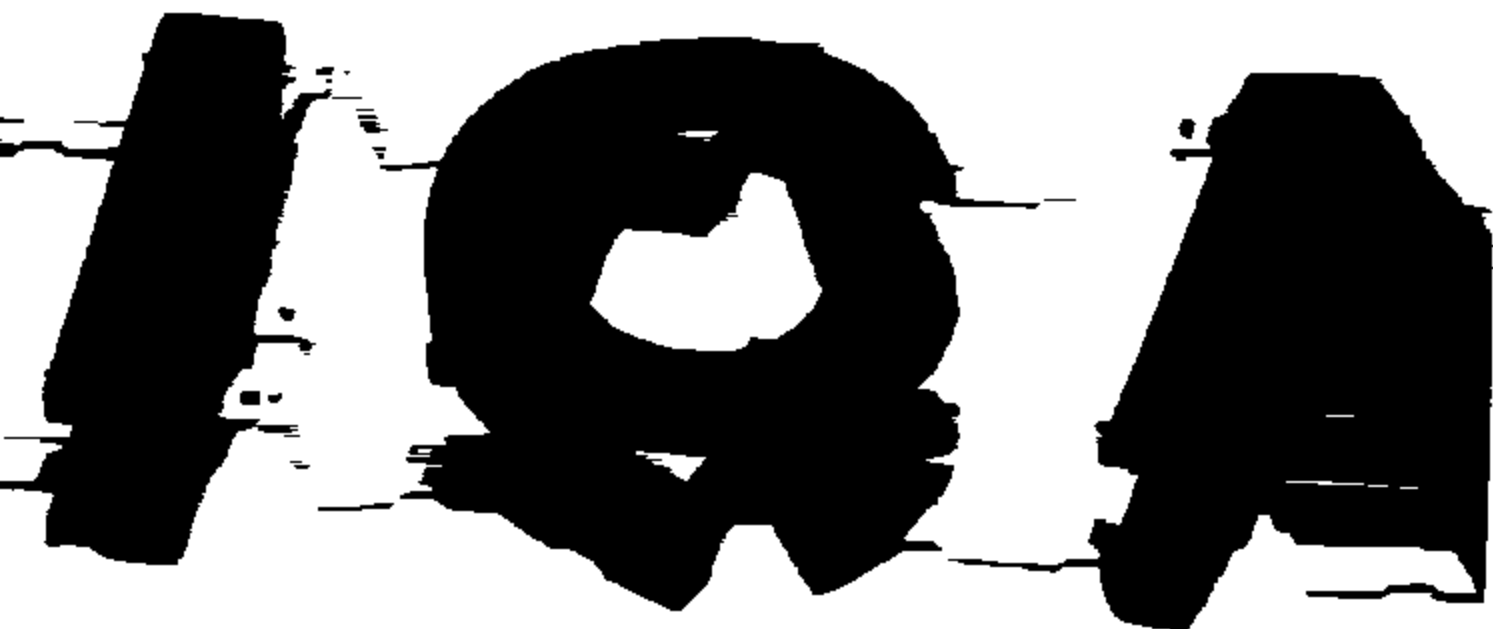
AMERICAN LEGION

POST 26

9.25.2003









[REDACTED]

[REDACTED]

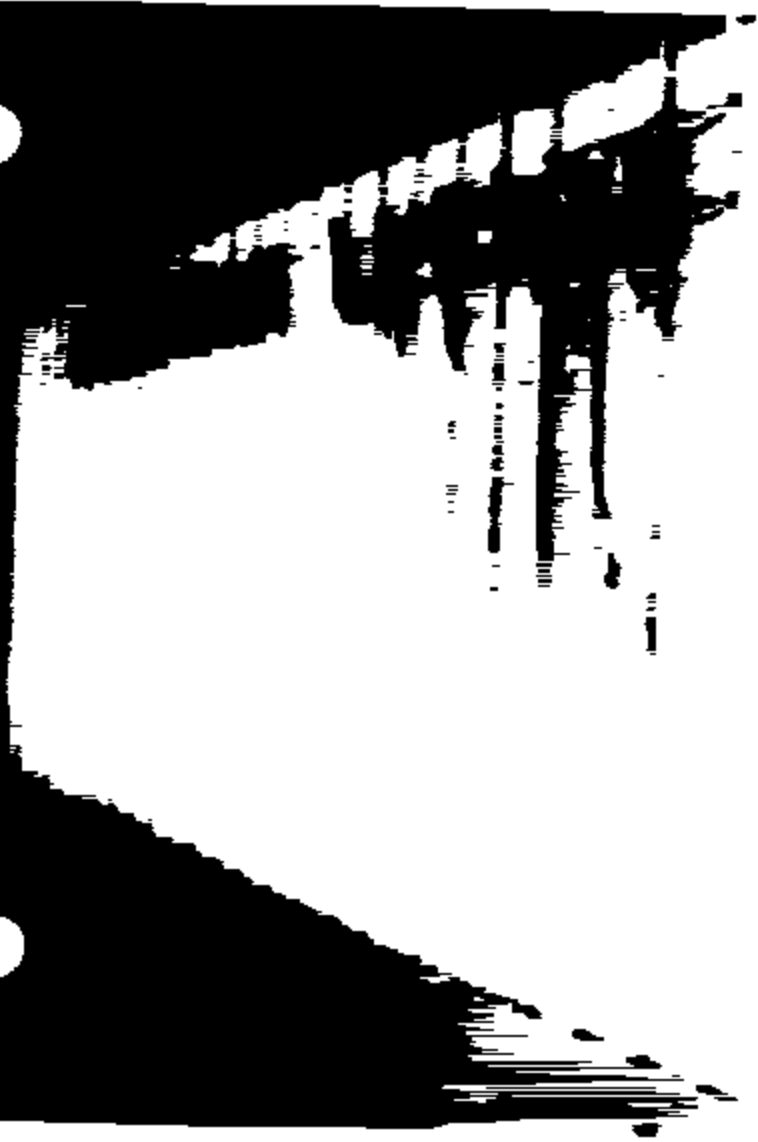
[REDACTED]

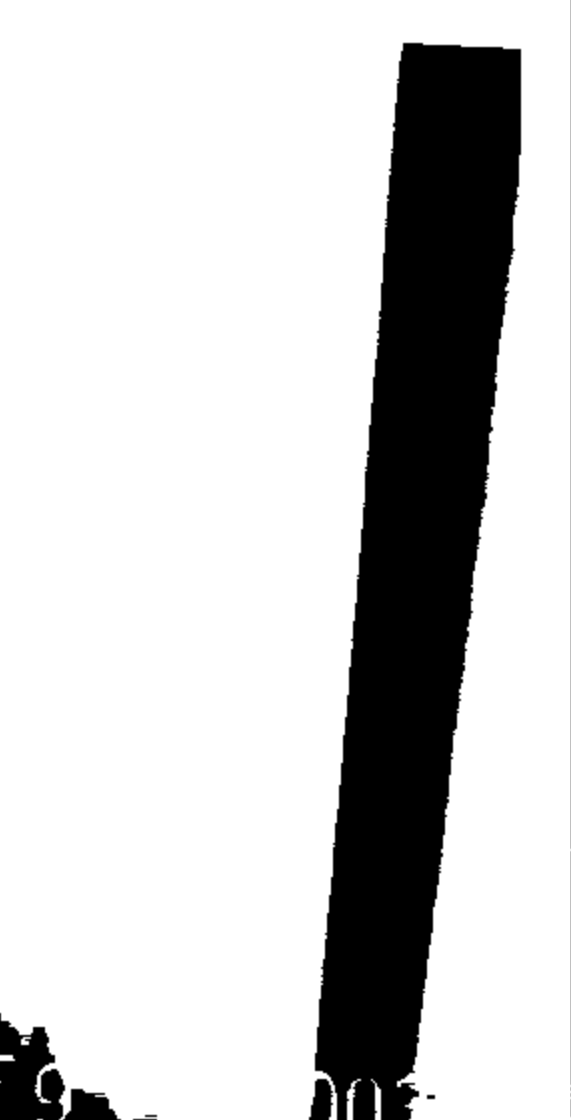
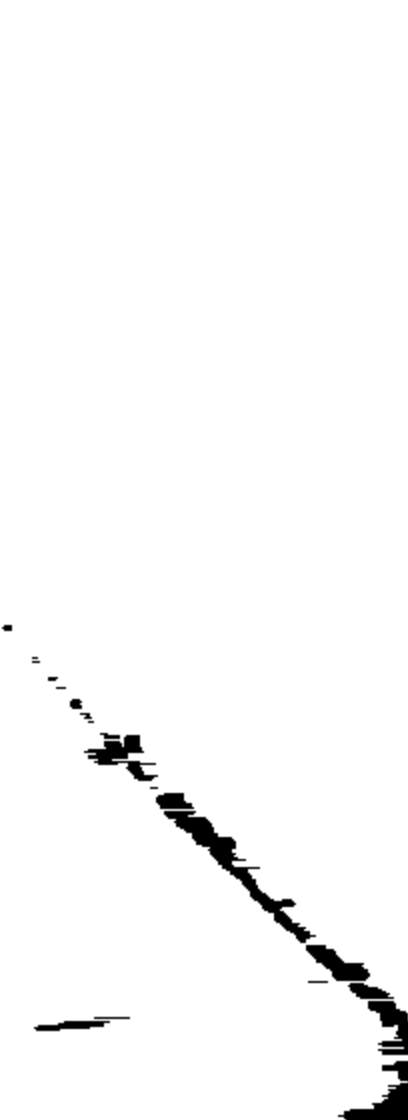
[REDACTED]

[REDACTED]

[REDACTED]

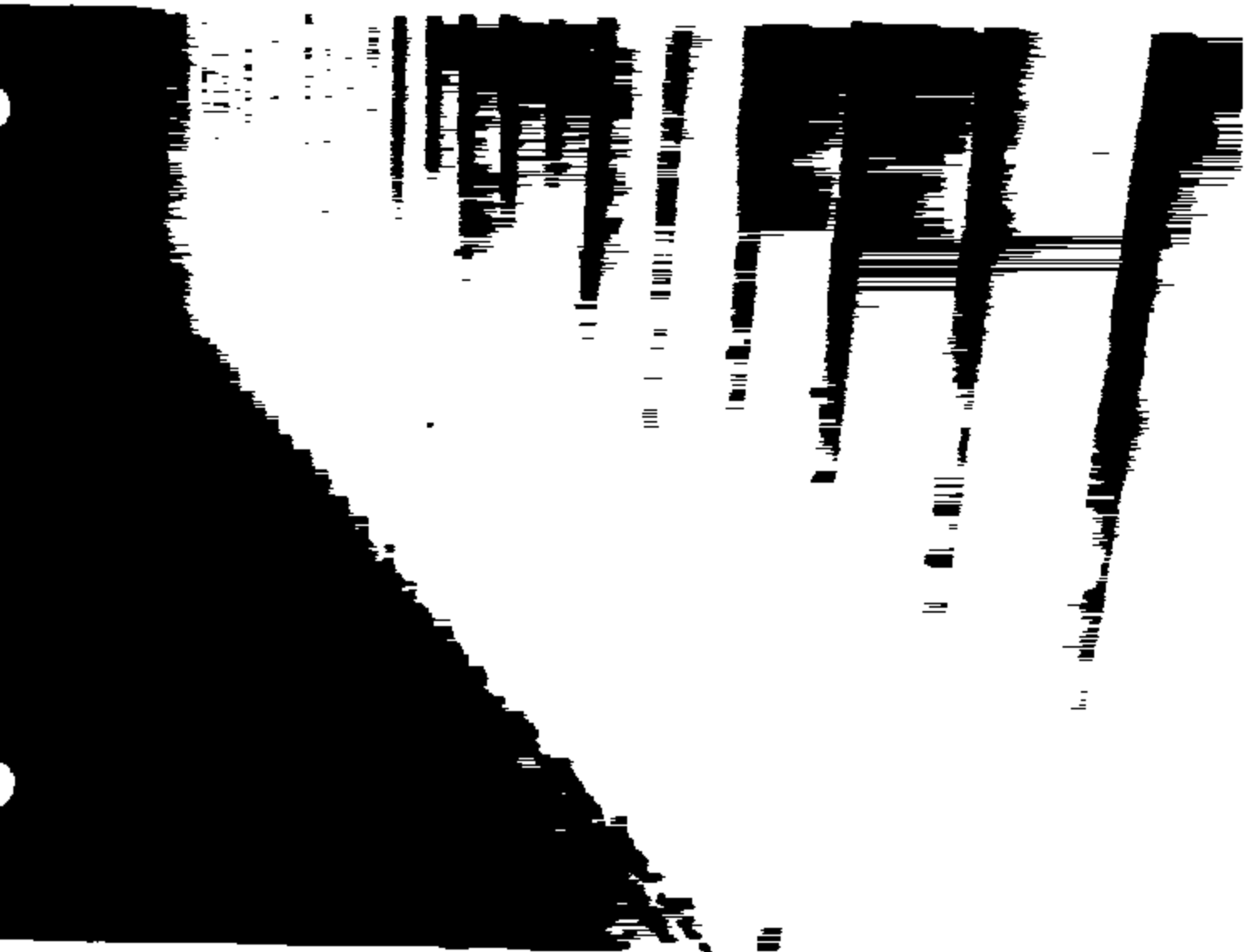
[REDACTED]





9

005





1/1



1/1





FE04-078 C 3013

tfs

Technical Forensic Services L.L.C.

1000 E. 15th Street
Lawrence, Missouri 64503
Phone: 781-923-3377

TFS Case #1935

10/27/15

Claim # [REDACTED]

Allied Insurance

PO Box 768

Lee's Summit, MO 64063 0768

DOI # 24 03

VIN # 1F173T129 [REDACTED]

1999 Ford F-150

Insurance [REDACTED]

Attn: Larry Doty

COMPONENT FAILURE/FIRE ANALYSIS

******* SUMMARY OF FINDINGS *******

After examination of the vehicle we find that: 1. The fire was accidental in nature. 2. The fire began in engine compartment and spread to the adjacent plastic combustibles in the interior. 3. The fire began as a result of a short to ground of the of the main under-hood power center battery feed cable. 2. The cable insulation was penetrated by pressure contact with the eyelet of the firewall mounted ground strap

The inspection was conducted at the Chanute insurance pool in Chanute, KS.

Burn damage patterns indicated that the fire started in the vehicle engine compartment and progressed into the interior



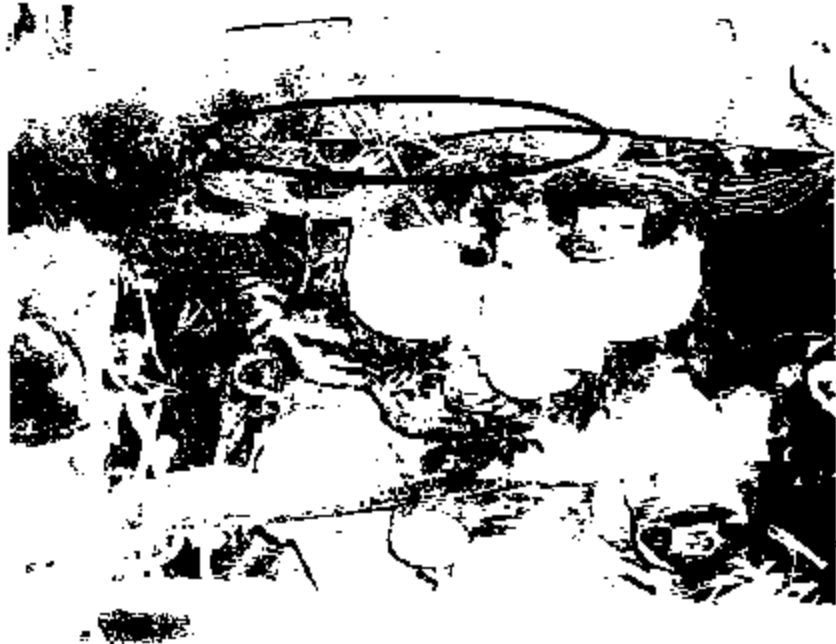
TFS Case #1935

Claim # [REDACTED]

PE04-078 C 3014

The inspection revealed that the most severe fire damage, and the point of origin, was at the rear of the engine.

No failure of the fuel system was found. The quick connect safety clips were in place.



In one area the cable was melted/welded to the firewall. This most probably was caused by a short that occurred as the cable insulation melted.

The engine compartment showed two shorts. One was the result of a cable being melted to the firewall. The other was a short in the fuel system. The fuel system was found to be in good condition.





The primary
cable is located
in the center.

The cable has
an arc burn in
one of the cable
strands.

The small firewall on the trap eyelet
displayed a corresponding arc burn.

The evidence in this case indicates that
the cable insulation was subjected to
pressure contact with the eyelet. The
firewall mounted on the trap eyelet

Michael E. Harrold
MICHAEL E. HARROLD, MEF
Master Investigator, Insurance
Society of Automobile Engineers, Inc.
Ft. Worth, Texas 76102

IFS Case #1935
Claim [REDACTED]

FE84-078 C 3015

TFS Case # 1935
Claim # [REDACTED]

Area of origin



PE04-078 C 2017

TFS Case # 1935
Claim # [REDACTED]

Area of origin
Electrical arc in under-hood fuse/relay box feed cable



PE04-078 C 3018

TFS Case # 1935
Claim [REDACTED]

Area of origin:
Ground strap eyelet



PE04-078 C 3019

TFS Case # 1935
Claim [REDACTED]

The area of the short was left un-disturbed and covered



REG-078 C 3020



PAZ19475 JPL
102100



PAZ19461 JPL
102100



PAZ19462 JPL
102100



PAZ19479 JPL
102100



PAZ19480 JPL
102100



PAZ19482 JPL
102100



PAZ19483 JPL
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PAZ19484 JPL
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PAZ19485 JPL
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PAZ19486 JPL
102100



PAZ19487 JPL
102100



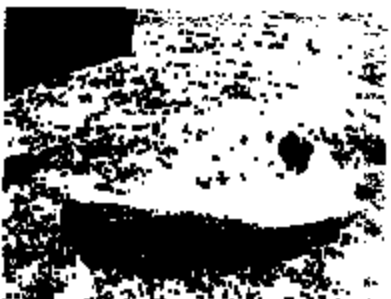
PAZ1948S JIN
102142



PAZ1949I JIN
102143



PAZ1949J JIN
102144



PAZ1949I JIN
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PAZ1949J JIN
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PAZ1949K JIN
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PAZ1949L JIN
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PAZ1949M JIN
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PAZ1949N JIN
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PAZ1949P JIN
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Page 2



PAZ1949Q JIN
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PA 19512 JRG
10/21/61



PA 19513 JRG
10/21/61



PA 19514 JRG
10/21/61



PA 19515 JRG
10/21/61



PA 19516 JRG
10/21/61



PA 19517 JRG
10/21/61



PA 19518 JRG
10/21/61



PA 19519 JRG
10/21/61



PA 19520 JRG
10/21/61



PA 19521 JRG
10/21/61



PA 19522 JRG
10/21/61



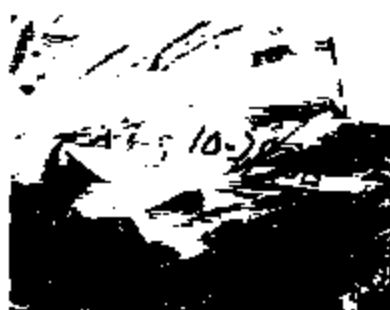
PA 19523 JRG
10/21/61



PA219624 JPH
10/21/85



PA219625 JPH
10/21/85



PA219626 JPH
10/21/85

KANSAS UNIFORM FIRE INCIDENT REPORTING SYSTEM (K-FIRS)

KANSAS STATE FIRE MARSHAL DEPARTMENT

Fire Department

KANSAS INCIDENT REPORT

File in This Report in Your Class Volume

Form 1 Year (Rev. 4)

1. TYPE OF INCIDENT		2. TYPE OF LOSS		3. TYPE OF DAMAGE		4. TYPE OF DAMAGE		5. TYPE OF DAMAGE	
1-1-1		1-1-1		1-1-1		1-1-1		1-1-1	
6. TYPE OF LOSS		7. TYPE OF DAMAGE		8. TYPE OF DAMAGE		9. TYPE OF DAMAGE		10. TYPE OF DAMAGE	
6-1-1		7-1-1		8-1-1		9-1-1		10-1-1	
11. TYPE OF DAMAGE		12. TYPE OF DAMAGE		13. TYPE OF DAMAGE		14. TYPE OF DAMAGE		15. TYPE OF DAMAGE	
11-1-1		12-1-1		13-1-1		14-1-1		15-1-1	
16. TYPE OF DAMAGE		17. TYPE OF DAMAGE		18. TYPE OF DAMAGE		19. TYPE OF DAMAGE		20. TYPE OF DAMAGE	
16-1-1		17-1-1		18-1-1		19-1-1		20-1-1	
21. TYPE OF DAMAGE		22. TYPE OF DAMAGE		23. TYPE OF DAMAGE		24. TYPE OF DAMAGE		25. TYPE OF DAMAGE	
21-1-1		22-1-1		23-1-1		24-1-1		25-1-1	
26. TYPE OF DAMAGE		27. TYPE OF DAMAGE		28. TYPE OF DAMAGE		29. TYPE OF DAMAGE		30. TYPE OF DAMAGE	
26-1-1		27-1-1		28-1-1		29-1-1		30-1-1	
31. TYPE OF DAMAGE		32. TYPE OF DAMAGE		33. TYPE OF DAMAGE		34. TYPE OF DAMAGE		35. TYPE OF DAMAGE	
31-1-1		32-1-1		33-1-1		34-1-1		35-1-1	
36. TYPE OF DAMAGE		37. TYPE OF DAMAGE		38. TYPE OF DAMAGE		39. TYPE OF DAMAGE		40. TYPE OF DAMAGE	
36-1-1		37-1-1		38-1-1		39-1-1		40-1-1	
41. TYPE OF DAMAGE		42. TYPE OF DAMAGE		43. TYPE OF DAMAGE		44. TYPE OF DAMAGE		45. TYPE OF DAMAGE	
41-1-1		42-1-1		43-1-1		44-1-1		45-1-1	
46. TYPE OF DAMAGE		47. TYPE OF DAMAGE		48. TYPE OF DAMAGE		49. TYPE OF DAMAGE		50. TYPE OF DAMAGE	
46-1-1		47-1-1		48-1-1		49-1-1		50-1-1	
51. TYPE OF DAMAGE		52. TYPE OF DAMAGE		53. TYPE OF DAMAGE		54. TYPE OF DAMAGE		55. TYPE OF DAMAGE	
51-1-1		52-1-1		53-1-1		54-1-1		55-1-1	
56. TYPE OF DAMAGE		57. TYPE OF DAMAGE		58. TYPE OF DAMAGE		59. TYPE OF DAMAGE		60. TYPE OF DAMAGE	
56-1-1		57-1-1		58-1-1		59-1-1		60-1-1	
61. TYPE OF DAMAGE		62. TYPE OF DAMAGE		63. TYPE OF DAMAGE		64. TYPE OF DAMAGE		65. TYPE OF DAMAGE	
61-1-1		62-1-1		63-1-1		64-1-1		65-1-1	
66. TYPE OF DAMAGE		67. TYPE OF DAMAGE		68. TYPE OF DAMAGE		69. TYPE OF DAMAGE		70. TYPE OF DAMAGE	
66-1-1		67-1-1		68-1-1		69-1-1		70-1-1	
71. TYPE OF DAMAGE		72. TYPE OF DAMAGE		73. TYPE OF DAMAGE		74. TYPE OF DAMAGE		75. TYPE OF DAMAGE	
71-1-1		72-1-1		73-1-1		74-1-1		75-1-1	
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81-1-1		82-1-1		83-1-1		84-1-1		85-1-1	
86. TYPE OF DAMAGE		87. TYPE OF DAMAGE		88. TYPE OF DAMAGE		89. TYPE OF DAMAGE		90. TYPE OF DAMAGE	
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91. TYPE OF DAMAGE		92. TYPE OF DAMAGE		93. TYPE OF DAMAGE		94. TYPE OF DAMAGE		95. TYPE OF DAMAGE	
91-1-1		92-1-1		93-1-1		94-1-1		95-1-1	
96. TYPE OF DAMAGE		97. TYPE OF DAMAGE		98. TYPE OF DAMAGE		99. TYPE OF DAMAGE		100. TYPE OF DAMAGE	
96-1-1		97-1-1		98-1-1		99-1-1		100-1-1	



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

LAW OFFICES OF
AARON & QUIRK
A PARTNERSHIP OF
PROFESSIONAL CORPORATION

Thomas E. Quirk
Board Certified, Civil Trial Law,
Texas Board of Legal Specialization.

901 N.E. LOOP 480, SUITE 903
San Antonio, Texas 78209-1307

Telephone (210) 520-0211
Facsimile (210) 520-0234
E-mail: teq@aarons-quirk.com

October 14, 2004

✓ Ford Motor Co.
PO Box 1899
Dearborn, MI 48121

Re: Date of Loss: May 5, 2004
Our File No.: 466.2427
Insurance Company: Allstate Insurance Company
Insured: [REDACTED]
Claimant: Ford Motor Company

ORIGINAL FILED IN 466.2427
DATE FILED: OCT 22 10:23 AM '04

Gentlemen:

This firm has been retained by Allstate Insurance Company to pursue its subrogation rights in connection with its policy with [REDACTED] for the accident that occurred on May 5, 2004.

The total property damage suffered by [REDACTED] is \$20,238.53. Unless we hear from you within the next ten (10) days, we have been instructed to file a lawsuit against you seeking such damages. If at the time of the accident you were covered by liability insurance, please forward this letter to your insurance company.

We look forward to hearing from you soon. With best wishes, we remain

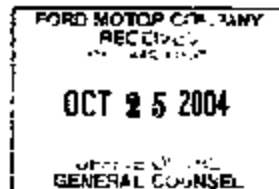
Very truly yours,

LAW OFFICES OF AARON & QUIRK

Thomas E. Quirk
Thomas E. Quirk

TEQ:rf

cc: Ford Motor Co.
Attn: Risk Department
PO Box 1899
Dearborn, MI 48121





Allstate.

You're in good hands.

Certified Mail # 7003 2260 0007 1524 0715

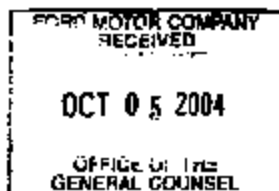
September 30, 2004

Ford Motor Company
Parklane Towers West, Suite 300
3 Parklane Blvd
Dearborn, MI 48126-2568

man

OCT 5 2004 *SM*

RE: Claim #: [REDACTED]
Our Insured: [REDACTED]
Loss Date: 5/5/04
Amt. of Claim: \$20238.53



Attention Shawn Norton:

The above noted subrogation claim has been identified as a product liability loss. We paid our insured for their loss and are looking to you for reimbursement. Should you or your carrier need more information, please call or write me. Please remit payment to Allstate Payment Processing Center, Attn: Subro Cash, PO Box 227257, Dallas, TX 75222-7257. Please include our claim number.

Complete description of the incident: Vehicle caught on fire between the battery and the right side front corner of the engine while parked overnight.

Our statement of defect: Strict Liability

Location of evidence: [REDACTED] Houston, TX [REDACTED]
443-1300

Manufacturer: Ford
Model: F150
Year: 2001
VIN: 1FTRW07L61 [REDACTED]

The following information is attached:

- Check copies
- Damage supporting paperwork
- Fire depart report

Please acknowledge receipt of this claim and your position regarding payment of our damages within 30 days.

Sincerely,

David Laughlin, SCLA
Subrogation Senior Service Representative

Roanoke National Subrogation Claims Center
8800 Electric Road, Suite 301, PO Box 21188, Roanoke, VA 24018
Phone: 1-800-778-2816 or (540) 988-2800 Fax: (540) 989-2840 or (540) 778-3803
Hours: 8:00 AM - 4:30 PM EST Monday - Friday

PE04-078 C 3829

SA601	TX	5/5/2004	2	2457109	0	NFIRS - 1
FDID	State	Incident Date	Station	Incident Number	Exposure	Basic

Location Address is on the Wildland Fire Module Census Tract:

Street Address E Suffix

108 S Delmont Street Type

Number/Milepost Prefix Street or Highway

Apt./Suite/Room Conroe TX 77301 State Zip Code

City City

Cross street or directions

Incident Type 131 Passenger vehicle fire	Dates & Times		Shifts & Alarms	
Aid Given or Received None	Their FDID	State	Alarm: 5/5/2004 06:44:25	C B 2
	Their Incident Number		Arrival: 5/5/2004 06:48:21	Shift Alm. Dist.
			Controlled: 5/5/2004 06:52:48	
			Last Unit: 5/5/2004 07:44:43	Special Studies

Actions Taken	Resources
11 Extinguish Primary Action Taken (1)	<input checked="" type="checkbox"/> Apparatus or Personnel Form Used
Additional Action Taken (2)	Apparatus Personnel
Additional Action Taken (3)	Suppression: 0 0
	EMS: 0 0
	Other: 0 0
	<input type="checkbox"/> Resource counts include aid received

Estimated Dollar Losses & Values

LOSSES None

Property: 15,000

Contents: 600

PRE-INCIDENT VALUE:

Property: 15,000

Contents: 600

Casualties None

	Deaths	Injuries	Hazardous Materials Released
Fire Services:	0	0	N None
Civilian:	0	0	

Detector Mixed Use Property

Property Use
962 Residential street, road or residential driveway

SAB01 FDID	TX State	6/6/2004 Incident Date	2 Station	2457108 Incident Number	0 Exposure	NFIRS - 2 Fire
---------------	-------------	---------------------------	--------------	----------------------------	---------------	-------------------

Property Details

Est. number of residential units
 Not Residential
 Number of buildings involved
 Buildings not involved
 0,000 Acres burned
 None
 Less than one acre

On-Site Materials or Products None

On-site material (1)	Storage use (1)
On-site material (2)	Storage use (2)
On-site material (3)	Storage use (3)

<p>Ignition</p> <p>8S Engine area, running gear, wheel area Area of origin UU Undetermined Heat Source UU Undetermined Item first ignited <input type="checkbox"/> Confined to object of origin UU Undetermined Type of material first ignited</p>	<p>Cause Of Ignition</p> <p><input type="checkbox"/> Exposure Report 5 Cause under investigation Cause</p> <p>Factors Contributing To Ignition</p> <p><input checked="" type="checkbox"/> None NN None Factor contributing to ignition (1) Factor contributing to ignition (2)</p>
--	---

Human Factors Contributing To Ignition None

<input type="checkbox"/> Aislep <input type="checkbox"/> Possibly impaired by alcohol or drugs <input type="checkbox"/> Unattended person <input type="checkbox"/> Possibly mentally disabled <input type="checkbox"/> Physically disabled <input type="checkbox"/> Multiple persons involved	<input type="checkbox"/> Age was a factor Estimated age of person involved Sex of person involved
--	---

SA601	TX	6/5/2004	2	2457109	0	NFIRS - 2
FDID	State	Incident Date	Station	Incident Number	Exposure	Fire

Equipment involved in ignition <input checked="" type="checkbox"/> None NNN None Equipment code Brand: Model: Serial #: Year: 0	Equipment Power Equipment Power Source Code Equipment Portability <input type="checkbox"/> Portable <input type="checkbox"/> Stationary
--	---

Fire Suppression Factors None

Fire suppression factor (1)

Fire suppression factor (2)

Fire suppression factor (3)

Mobile Property Involved <input type="checkbox"/> None <input type="checkbox"/> Not involved in ignition, but burned <input type="checkbox"/> Involved in ignition, but did not burn <input checked="" type="checkbox"/> Involved in ignition and burn F-150 Super Crew Mobile property model 34X-B84 License Plate Number	Mobile Property Type & Make 11 Passenger car. Mobile property type FO Ford Mobile property make 2000 Year 1FTRW07L81KD53483 VIN Number TX State
--	---

Local Use

Pre-Fire Plan Available

Arson report attached

Police report attached

Coroner report attached

Other reports attached

SA601	TX	5/5/2004	2	2457109	0	NFIRS - 9
FDID	State	Incident Date	Station	Incident Number	Exposure	Apparatus

Unit ID:	E-3	Dispatched:	5/5/2004	06:48:40	Use:	Suppression
Serial #:		Enroute:	5/5/2004	06:50:35		
Type:	11	Arrival:	5/5/2004	06:53:05		
	Engine	Clear:	5/5/2004	06:53:05		
		In Quarters:		00:00:00		

Actions Taken

- | | |
|----|----|
| 1) | 3) |
| 2) | 4) |

Personnel ID	Name	Rank
DuBois, Micah	Lieutenant Micah DuBois	Lieutenant
Mayer, Richard	Fire Fighter Richard Mayer	Fire Fighter
McMahan, Andy	Lieutenant Andy McMahan	Lieutenant

Unit ID:	FMO	Dispatched:	5/5/2004	07:01:37	Use:	Suppression
Serial #:		Enroute:	5/5/2004	07:01:40		
Type:	80	Arrival:	5/5/2004	07:07:09		
	Support apparatus, other	Clear:	5/5/2004	07:44:43		
		In Quarters:		00:00:00		

Actions Taken

- | | |
|----|----|
| 1) | 3) |
| 2) | 4) |

Personnel ID	Name	Rank
Plant, John	Lt/Investigator John Plant	Lt/Investigator

Unit ID:	L-1	Dispatched:	5/5/2004	06:48:40	Use:	Suppression
Serial #:		Enroute:	5/5/2004	06:50:00		
Type:	12	Arrival:	5/5/2004	06:54:36		
	Truck or aerial	Clear:	5/5/2004	07:22:22		
		In Quarters:		00:00:00		

Actions Taken

- | | |
|----|----|
| 1) | 3) |
| 2) | 4) |

Personnel ID	Name	Rank
Brautigam, Sandra	Fire Fighter Sandra Brautigam	Fire Fighter
Lagoudes, Michael	Fire Fighter Michael Lagoudes	Fire Fighter
Miller, Joe	Lieutenant Joe Miller	Lieutenant
Wyatt, Jonathan	Fire Fighter Jonathan Wyatt	Fire Fighter

FEB4-078 0 3035

SAB01	TX	5/5/2004	2	2457109	0	NFIRS - B
FDID	State	Incident Date	Station	Incident Number	Exposure	Apparable



PEBA-878 C 3837

COSBY, OLTMAN & BELL, P.C.

Attorneys and Counselors
77 West Washington Street, Suite 1605
Chicago, Illinois 60602
Phone (312) 263-7180
Fax (312) 263-3817

2005
WRITER'S DIRECT DIAL:
(312) 263-7184

January 5, 2005

Mr. Shawn Norton
Claims Analyst/Litigation Assistant
Ford Motor Company
Three Parklane Blvd.
Suite 300
Dearborn, MI 48126-2568

Re: *State Farm Auto & Fire v. Ford Motor Company*
Court number: TBA
State Farm insured: Dale and Rosemary Boulier
Auto claim number(s) [REDACTED]
Fire claim number(s) [REDACTED]
Vehicle: 1999 Ford F-150 pick-up (VIN) 2FFRX18W2XC [REDACTED]
Date of loss: April 17, 2004
Our file number: 1647.213

498932
CP
1/10/05

Dear Mr. Norton:

Pursuant to your recent request, enclosed are various documents for your client's evaluation of the referenced matter. As previously advised, the subject vehicle was purchased used from an individual on or about September 27, 2003. The vehicle was involved in a fire at 8787 Cornthwaite Road, Macon, Illinois on April 17, 2004, which destroyed it. Mileage at the time of the fire was approximately 61,000. The investigation to date indicates that fire originated within the engine compartment, specifically at the right or passenger side, where transmission fluid was expelled onto the exhaust manifold.

After you review the enclosed materials, I would appreciate the opportunity to discuss with you the facts of the occurrence, defendants' exposure and the potential for an early resolution of this matter. It is my hope that we can reach an amicable resolution of the entire matter. If the case can not be resolved within the next few weeks, I am prepared to file a complaint, and will do so to get the case moving.

The vehicle is being held at an off site location, and is available for inspection by appointment. If you wish to inspect the vehicle, please contact me to schedule an appointment. If you have any questions or comments concerning this matter, please call at your convenience.

Very truly yours,

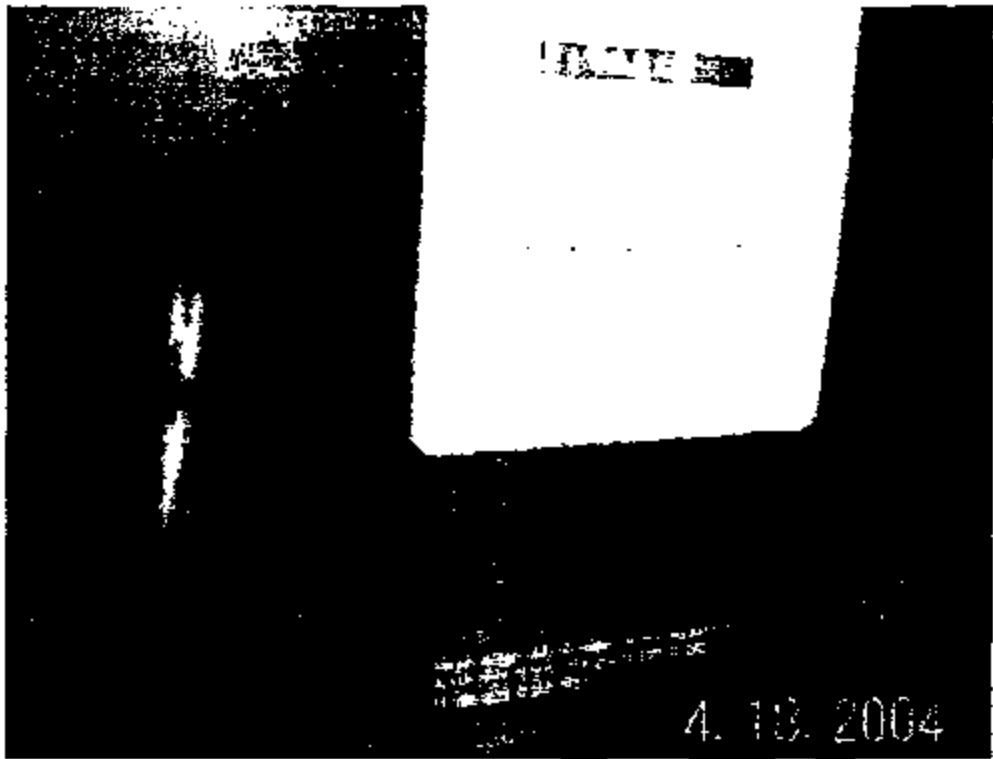
Gregory Altman
Gregory Altman

GO/aa
Enclosures

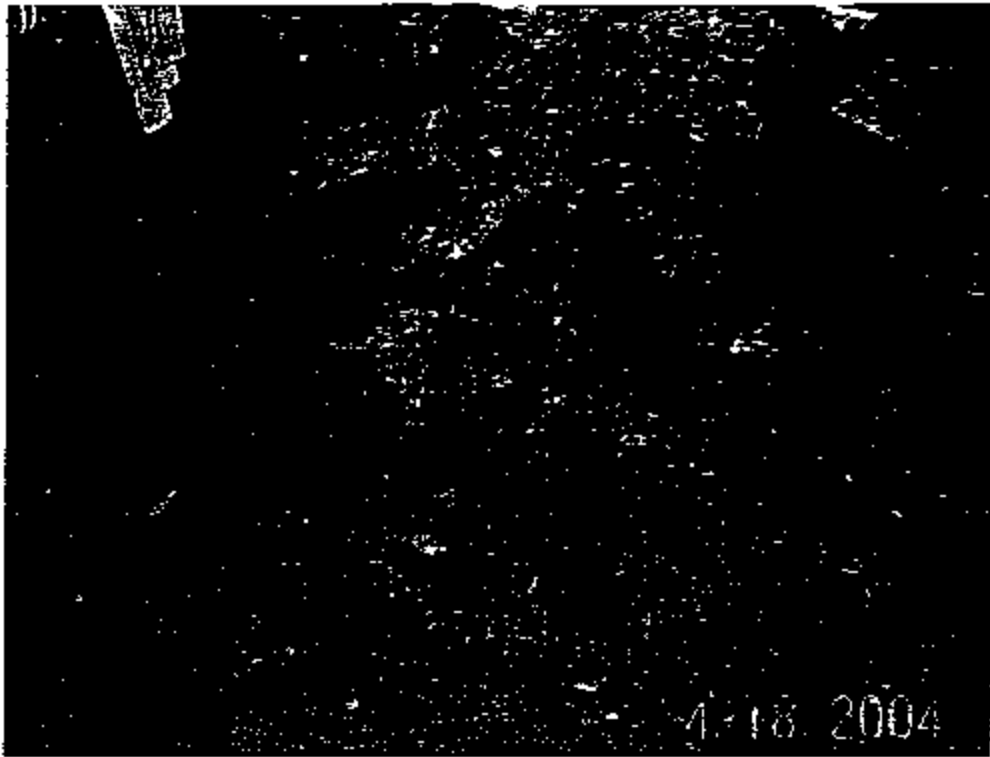
cc: Subrogation Claims Specialist
State Farm Insurance Companies

REG-078 C 3038

- Fire
- 2/6/2005
- Macon, IL
- Exp. of
- File RP



PE84-878 C 3839



PE04-078 C 3040



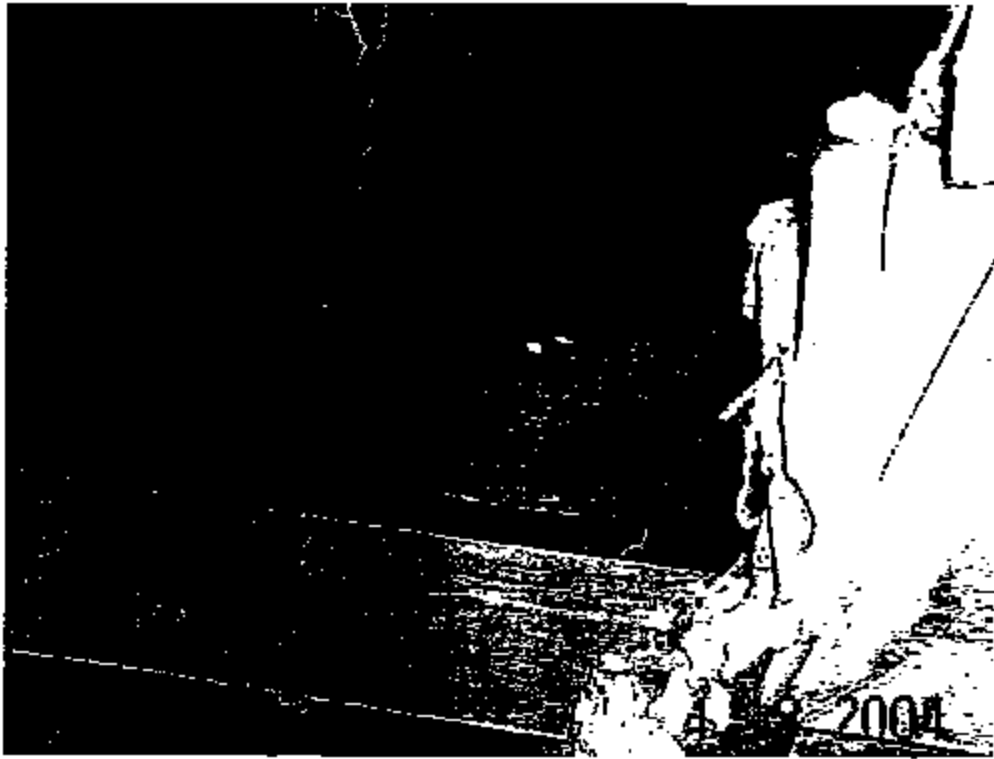
PE84-878 C 3841



PE04-078 C 3042



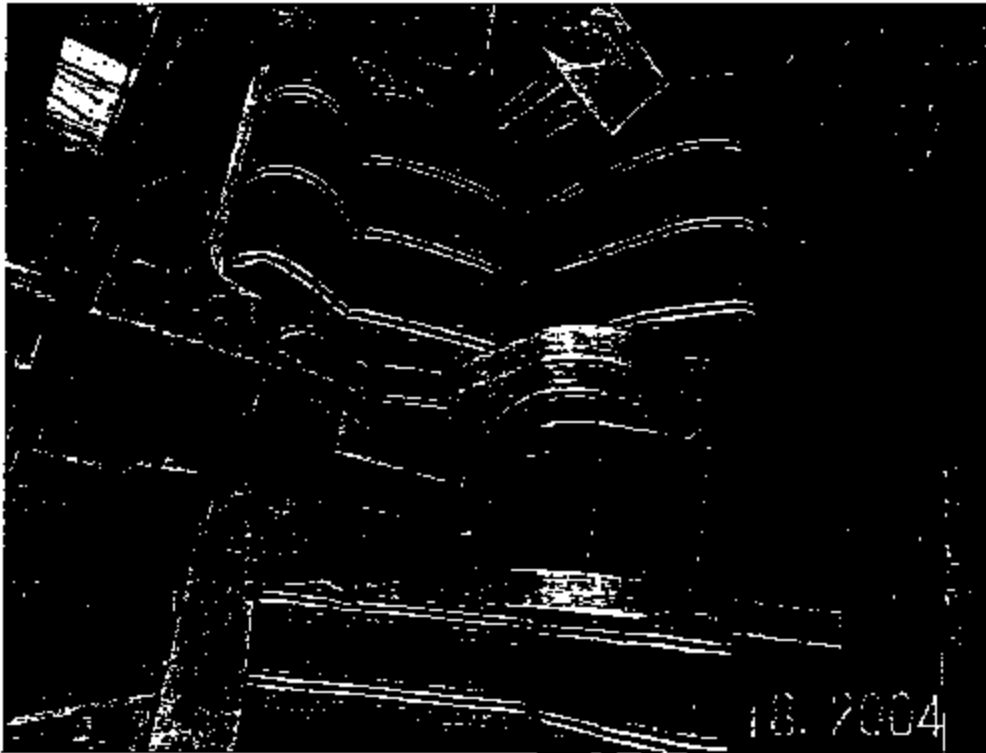
PE04-076 C 3043



FE84-078 C 3844



FE84-878 C 3045



18. 2004

PE84-878 C 3048



PE04-878 C 3847



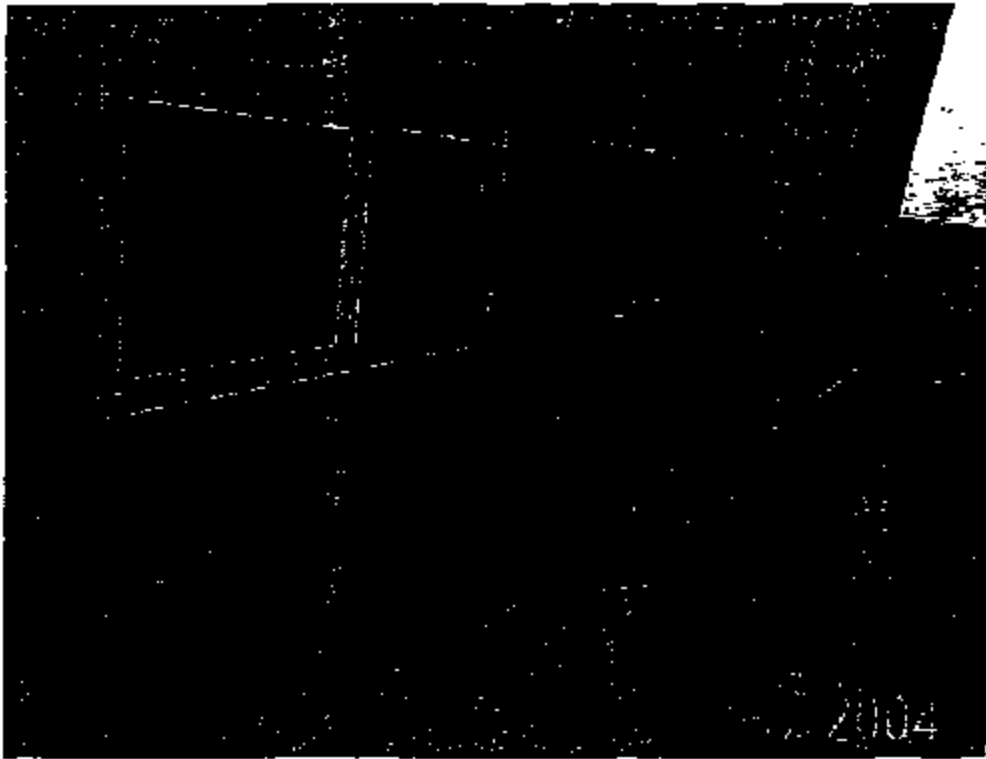
PE04-078 C 3848



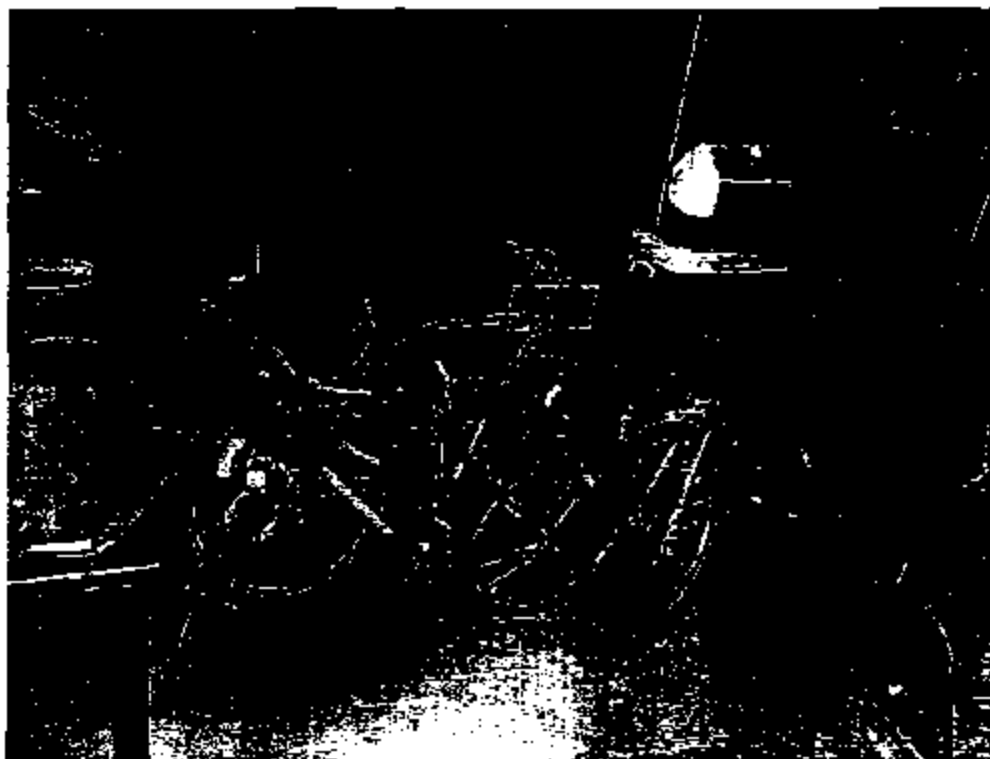
FE84-078 C 3849



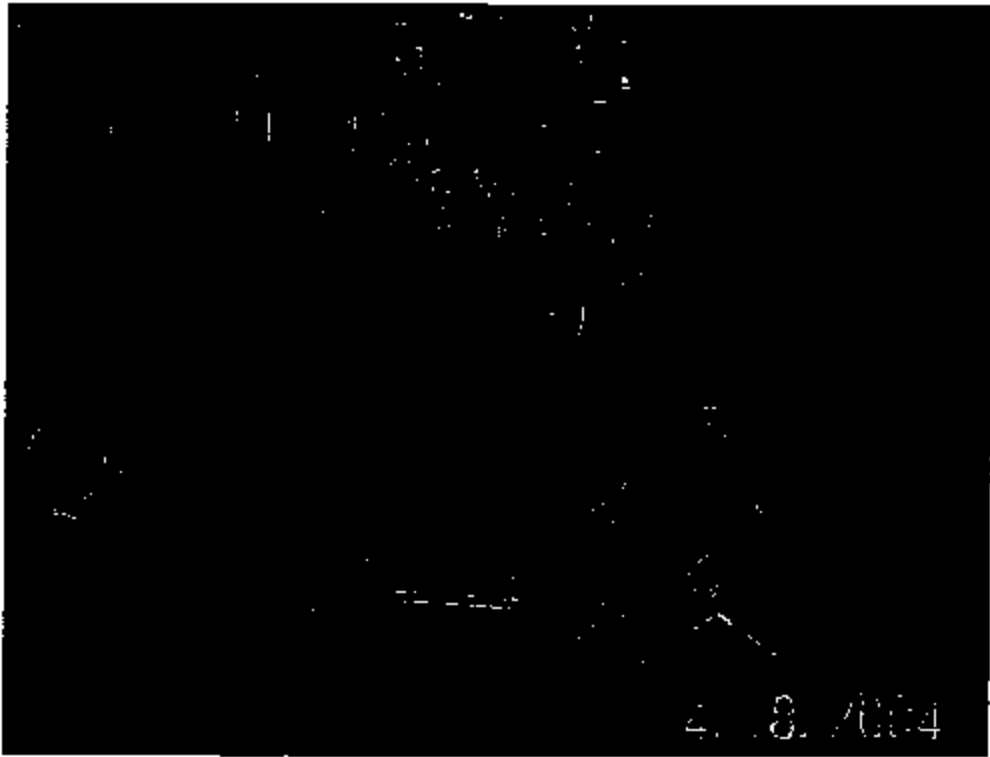
PE84-078 C 3850



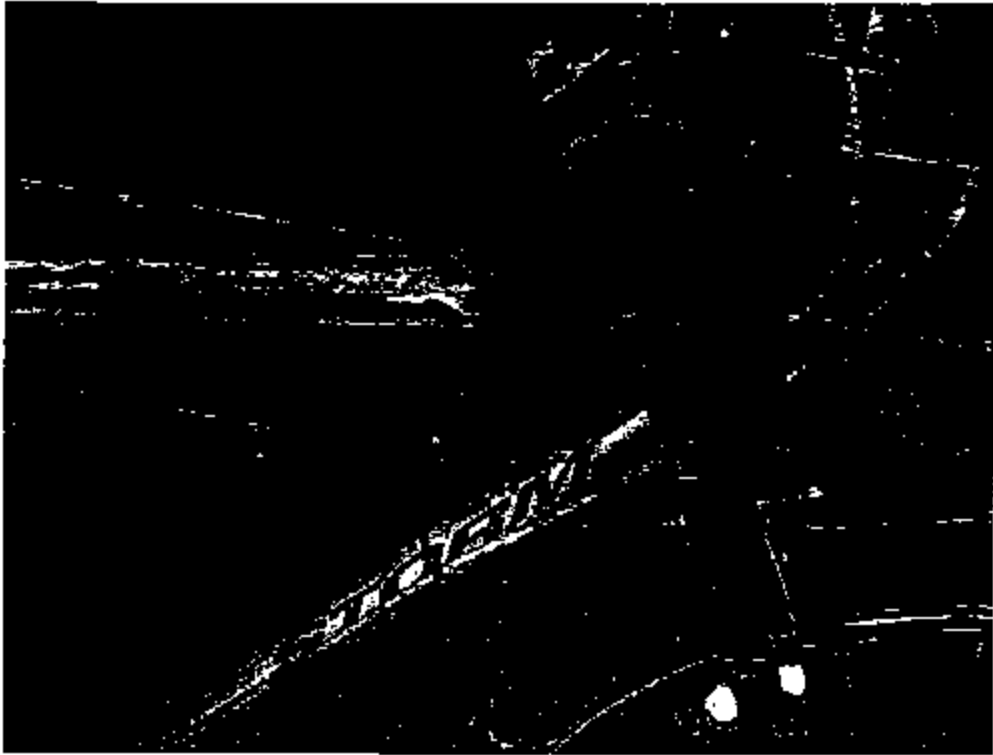
FE04-075 C 3051



PE04-078 C 3052



PE04-078 C 3053



PE04-B7E C 3854

FILE RPT.

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



STATE OF ILLINOIS OFFICE OF THE STATE FIRE MARSHAL
1805 STEVENSON DRIVE, SPRINGFIELD, ILLINOIS 62769-4259

USE IN APPROPRIATE BLUE
ONLY ONE COPY PER FIELD OF ACTION

FIRE INCIDENT REPORT

Forwarded to the following agency:
The State is requesting the name of the jurisdiction that is necessary to complete the statutory purpose as outlined in Ill. Rev. Stat., Ch. 127. For a disclosure of the information is required. Any officer who wishes to comply with this act shall be guilty of a party offense. This form has been approved by the Permit Management Center.

FORM NO.		INCIDENT NO.		APP. NO.	ANCE	DATE	YEAR	DAY OF WEEK	ALARM TIME	1. <input type="checkbox"/> Date	2. <input type="checkbox"/> Change				
A		MAY 02		2004050	0101	12	04	SATURDAY	171001	11008	1122				
B TYPE OF SITUATION FOUND				TYPE OF ACTION TAKEN				MUTUAL AID							
Structure Fire <input checked="" type="checkbox"/> 11 Outside of Structure Fire <input type="checkbox"/> 12 Vehicle Fire <input type="checkbox"/> 13				Trees/Brush/Grass Fire <input type="checkbox"/> 14 Refuse Fire <input type="checkbox"/> 15				Extinguishment <input checked="" type="checkbox"/> 1 Investigation Only <input type="checkbox"/> 3				None <input type="checkbox"/> Received <input checked="" type="checkbox"/> 1			
C FIXED PROPERTY USE				IGNITION FACTOR											
Not Applicable <input type="checkbox"/> 008 1-Family Dwelling-Year <input type="checkbox"/> 411 2-Family Dwelling-Year <input type="checkbox"/> 414 3-4 Unit Apt/Townh/Lt <input type="checkbox"/> 422 5-20 Unit Apt/Townh/Lt <input type="checkbox"/> 423 + 30 Unit Apt/Townh/Flt <input type="checkbox"/> 424 Resident Parking/Garage <input checked="" type="checkbox"/> 881 Vacant Property <input type="checkbox"/> 915 Open Land/Field <input type="checkbox"/> 931				Vacant Lot <input type="checkbox"/> 936 Railroad Right of Way <input type="checkbox"/> 931 Limit Access/Divid Hwy <input type="checkbox"/> 961 Paved Public Street <input type="checkbox"/> 962 Paved Private St/Way <input type="checkbox"/> 963 Unpaved St/Rd/Park <input type="checkbox"/> 964 Uncovered Parking Area <input type="checkbox"/> 965				Incendary-No Cvd Disab <input type="checkbox"/> 11 Suspicious-No Cvd Disab <input type="checkbox"/> 21 Abandoned Material <input type="checkbox"/> 31 Inadeq Conn/Curr Flame <input type="checkbox"/> 34 Child Playing <input type="checkbox"/> 36 Combust/Toss Close Heat <input checked="" type="checkbox"/> 46 Part Failure/Leak/Break <input type="checkbox"/> 51				Shrt Cctd/Grad Fault <input type="checkbox"/> 54 Other Elec Failure <input type="checkbox"/> 55 Lack of Maintenance <input type="checkbox"/> 56 Backfire <input type="checkbox"/> 57 Unattended Operation <input type="checkbox"/> 73			
D ADDRESS															
E CALLER NAME															
F OWNER ADDRESS CITY															
G Telephone Direct <input type="checkbox"/> 1 Private Fire Alarm <input type="checkbox"/> 3 Radio <input checked="" type="checkbox"/> 4				Direct Verbal Report <input type="checkbox"/> 5 Telephone Tie-Line <input type="checkbox"/> 7											
H NO. FIRE SERVICE PERSONNEL RESPONDED				NO. ENGINE RESPONDED				NO. AERIAL APPARATUS RESPONDED				NO. UTILITY VEHICLES RESPONDED			
1				3				0				1			
I NUMBER INCIDENT-RELATED INCIDENTS				NUMBER INCIDENT-RELATED CONTACTS											
1				10				0				0			
J COMPLEX				MOBILE PROPERTY TYPE											
Dwelling <input type="checkbox"/> 41 Apartment <input type="checkbox"/> 42 Shopping <input type="checkbox"/> 58 Farm <input checked="" type="checkbox"/> 63 Campsite <input type="checkbox"/> 93				Road <input type="checkbox"/> 96 No Complex <input type="checkbox"/> 98				Of any, do line 8 Not Applicable <input checked="" type="checkbox"/> 08 Automobile <input type="checkbox"/> 11 Mobile Home <input type="checkbox"/> 17				Truck-Cam Under 1 Ton <input type="checkbox"/> 22			
K AREA OF ORIGIN				EQUIPMENT INVOLVED/IGNITION											
Lounge Area <input type="checkbox"/> 14 Sleep Rm Under 5 Pcs/Pl <input type="checkbox"/> 21 Kitchen/Cooking Area <input type="checkbox"/> 24 Trash Area/Com/water <input type="checkbox"/> 40 Garage/Carport/Storage <input checked="" type="checkbox"/> 47				Trans Equip/Passage Area <input type="checkbox"/> 81 Engn Area of Trnsr Eng <input type="checkbox"/> 83 Railroad Embankment <input type="checkbox"/> 91 Highway/Public Way/St <input type="checkbox"/> 92 Lawn/Field/Cipes Area <input type="checkbox"/> 94				Fuel, Stary Lcd Htg Unit <input type="checkbox"/> 13 Portable Local Htg Unit <input type="checkbox"/> 15 Chimney, Gas Vent Fla <input type="checkbox"/> 16 Fire/Stary Surf Unit <input type="checkbox"/> 21 Open Fire Call <input type="checkbox"/> 26				Cord, Plug <input type="checkbox"/> 47 Vehicle <input checked="" type="checkbox"/> 96 No Equipment Involved <input type="checkbox"/> 98			
L FORM OF HEAT OF IGNITION				TYPE OF MATERIAL IGNITED				FORM OF MATERIAL IGNITED							
Spark/Gas Fueled Exp <input type="checkbox"/> 11 Heat/Gas Fueled Exp <input type="checkbox"/> 12 Spark/Liq fueled Exp <input type="checkbox"/> 13 Heat/Liq Fueled Exp <input type="checkbox"/> 14 Short Circuit-Insul Ins <input type="checkbox"/> 23 Short Circuit-Unspec <input type="checkbox"/> 24 Overloaded Exp <input type="checkbox"/> 27 Cigarette <input type="checkbox"/> 31 Match <input type="checkbox"/> 45				Open Fire <input type="checkbox"/> 47 W.L. Intr From Engin <input type="checkbox"/> 48 Friction <input type="checkbox"/> 51 Reignition/Rekindle <input type="checkbox"/> 55 Property Oper Elec Exp <input type="checkbox"/> 56 Fireworks <input type="checkbox"/> 63 Lightning Discharge <input type="checkbox"/> 73 Radiated Heat <input checked="" type="checkbox"/> 82				Castine <input type="checkbox"/> 23 Felt/wool (thread) <input type="checkbox"/> 31 Plastic-Unclassified <input type="checkbox"/> 40 Rubber <input type="checkbox"/> 51 Grass/Leaves <input type="checkbox"/> 54 Sawn Wood <input type="checkbox"/> 63 Untreated Paper <input type="checkbox"/> 67 Man-made Fiber <input type="checkbox"/> 71 Cotton/Rayon <input type="checkbox"/> 72 Multiple Types <input checked="" type="checkbox"/> 97				Structural Member <input type="checkbox"/> 17 Upholstered Sofa/Chair <input type="checkbox"/> 21 Electrical Wire <input type="checkbox"/> 61 Fuel <input type="checkbox"/> 65 Growing/Living Form <input type="checkbox"/> 74 Rubbish/Trash <input type="checkbox"/> 75 Cooking Material <input type="checkbox"/> 76 Gas/Liquid From Pipe <input type="checkbox"/> 86 Multiple Form <input checked="" type="checkbox"/> 97			

COMPLETE ON ALL INCIDENTS

COMPLETE ON ALL FIRE INCIDENTS

RECEIVED
MAY 6 2004

CONTINUED ON REVERSE SIDE
BLOOMINGTON CSC

M	METHOD OF EXTINGUISHMENT		SOURCE OF FIRE ORIGIN		PROPERTY LOSS
	Self Extinguished <input type="checkbox"/> 1	Fireman Hand Tank Water <input checked="" type="checkbox"/> 5	Grade Level 9 Ft Above <input checked="" type="checkbox"/> 1		
	Make Shift Aids <input type="checkbox"/> 2	Fireman Hand Hydro <input type="checkbox"/> 6	10-19 Ft Above <input type="checkbox"/> 2		
	Portable Extinguisher <input type="checkbox"/> 3		Below Ground/Water Level <input type="checkbox"/> 3		3,000

COMPLETE LINES N - R FOR STRUCTURE FIRES ONLY

N	NUMBER OF STORIES		CONSTRUCTION TYPE		
	1 Story <input checked="" type="checkbox"/> 1	7 to 12 Stories <input type="checkbox"/> 5	Fire Resistant <input type="checkbox"/> 1	Unprotected Wood Frame <input type="checkbox"/> 8	
	2 Stories <input type="checkbox"/> 2	13 to 24 Stories <input type="checkbox"/> 6	Unprotected Ordinary <input type="checkbox"/> 4		
	3 to 4 Stories <input type="checkbox"/> 3		Protected Wood Frame <input checked="" type="checkbox"/> 7		
	5 to 6 Stories <input type="checkbox"/> 4				
O	EXTENT OF FLAME DAMAGE		EXTENT OF SMOKE DAMAGE		
	Object <input type="checkbox"/> 1	Building <input type="checkbox"/> 6	Object <input type="checkbox"/> 1	Building <input checked="" type="checkbox"/> 6	
	Part Room <input type="checkbox"/> 2		Part Room <input type="checkbox"/> 2		
	Room <input type="checkbox"/> 3		Room <input type="checkbox"/> 3		
P	DETECTOR PERFORMANCE		SPRINKLER PERFORMANCE		
	No Detectors Present <input type="checkbox"/> 8	NONE <input checked="" type="checkbox"/> 9	No Equip Present <input type="checkbox"/> 8	NONE <input checked="" type="checkbox"/> 9	
Q	IF SMOKE SPREAD BEYOND ROOM OF ORIGIN:			AVENUE OF SMOKE TRAVEL	
	TYPE OF MATERIAL GENERATING MOST SMOKE:				Corridor <input type="checkbox"/> 2
	Gasoline <input type="checkbox"/> 23	Grease/Oils <input type="checkbox"/> 54	Entrail/Bayon <input type="checkbox"/> 72	Opening in Construction <input type="checkbox"/> 5	
	Fat/Grease (Fresh) <input type="checkbox"/> 31	Sawn Wood <input type="checkbox"/> 61	Multiple Types <input checked="" type="checkbox"/> 77	No Significant Avenue <input checked="" type="checkbox"/> 8	
	Plastic-Unclassified <input type="checkbox"/> 40	Untreated Paper <input type="checkbox"/> 67			
	Rubber <input type="checkbox"/> 51	Man-Made Fiber <input type="checkbox"/> 71			
R	FORM OF MATERIAL GENERATING MOST SMOKE:				
	Structural Member <input type="checkbox"/> 17	Fuel <input type="checkbox"/> 65	Cooking Material <input type="checkbox"/> 76	Multiple Forms <input checked="" type="checkbox"/> 97	
	Upholstered Sofa/Chair <input type="checkbox"/> 21	General Living Form <input type="checkbox"/> 74	Gas/Liquid From Pipe <input type="checkbox"/> 84		
	Electrical Wire <input type="checkbox"/> 61	Other <input type="checkbox"/> 75			
S	IF MOBILE FACILITY				
	TYPE	MAKE	MODEL	YEAR	
T	PICKUP TRUCK	FORD	F150	APPROX 2000	
U	DRIVER (NAME, GRADE, ADDRESS)		WEATHER	TEMPERATURE	WIND DIRECTION AND VELOCITY
	DAVID BELSK AMPER		CLEAR	75°	S.W. 10 MPH

OPTIONAL COMMENT AREA:

GUARDE CAUGHT FIRE FROM PICK UP
 & PARKED CLOSE BY. HAD TO TAKE PLASTER
 BOARD OFF ON WALL TO GET TO BURNING
 INSULATION. RECEIVED MUTUAL AID
 FROM MT. ZION FIRE DEPT.

RECORDED CLAIMS STATEMENT

MAY 14 2004

Send To: Randy Ingram	SG/Dept: Bloomington Auto/KD1
Insured: [REDACTED]	Claim Number: 13-8541-107
Interviewee: [REDACTED]	Interviewer: Randy Ingram
Date of Loss: 4-17-04	Date of Statement: 5-12-04

This is Randy Ingram talking with [REDACTED] regarding a fire loss to his vehicle. Today's date is the 12th of May 2004. It's approximately ten after nine in the morning. I'm speaking from 309-783-0370.

Q: [REDACTED] are you aware that this conversation is being recorded?

A: Yes.

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

A: Yes.

Q: Okay. Who was the lien holder, if any, at the time of the loss?

A: There was none.

Q: You own the vehicle outright?

A: Yes sir.

Q: Okay. You're going to have to speak up just a little bit please.

A: _____ signing the title over to State Farm.

Q: All right. And state your full name and spell your last.

A: It's Dale the [REDACTED]

Q: And was there anybody in the vehicle with you?

A: No.

Q: Are you the primary driver on the vehicle?

A: Yes.

Q: Does anyone else have occasion to drive it?

A: My wife would and then on a very rare occasion my son might but that would be rare, I guess.

Q: I see. And your son's how old?

A: [REDACTED]

Q: I see. Does he live at your residence?

A: No he doesn't.

Q: Okay, but he has driven it on occasion?

A: Yes he has. I think after I bought it he drove it a couple of times.

Q: I see. So basically, it's you and sometimes your wife, that's basically who drives the vehicle?

Statement Of: [REDACTED]

Claim: [REDACTED]

Page 1

A: Right.

Q: Have you had anybody say anything to you about when they drive the vehicle if they've had any problems?

A: No.

Q: The date and time of the loss we have down here as April the 17th is that about right?

A: You know, I'm not sure now.

Q: It's been awhile, hasn't it?

A: If it's on a Saturday that's probably correct.

Q: About 9:30 in the morning?

A: Yeah, between 9:30 and 10.

Q: Okay. What were the weather conditions like?

A: It was sunny and clear. Windy.

Q: And where did it happen at?

A: It happened at my residence in the driveway.

Q: What fire department was called?

A: They called the Macon Illinois it's South Macon Fire Department then they also have a Mount Zion Responder too, which when you call 911, they call both of them, I guess.

Q: I see. How long did it take them to to get to the site?

A: I want to tell you fifteen minutes and I think I'm probably pretty close to that but, I don't know, I was anxious for them to get there so you know how time is. But I believe it was around 15 minutes.

Q: And you called them yourself, did you call them from your cell phone?

A: Yeah. I did. I called at, well, I called 911 because I was outside and I didn't know what the Macon phone number was.

Q: Sure. And the 911 number you called that's the police, they called the fire department?

A: Yes sir.

Q: Oh, okay, all right. And that whole process took about 15 minutes?

A: Probably from the time I first made the call to when they was actually pulling up.

Q: All right. Describe the vehicle to me. Make, model, type.

A: It's a Ford 1998 XLT Extended Cab ____ Wheel Drive.

Q: What's the engine size?

A: 4.6 liters.

Q: That's a pretty good size, isn't it?

A: That's the smaller of the V8's.

Q: Okay. And when did you purchase the vehicle?

A: I'm going to tell you it was probably either September or October, I believe.

Statement Of:
Claim:

Page 2

Q: 07
A: 03.

Q: Oh, okay. You bought it from a dealership or an individual?
A: An individual.

Q: And what was that person's name?
A: Hold on. I've got it wrote down at home but, you know, if memory serves me right now, I cannot thinking what it is.

Q: How did you, how did you locate the vehicle?
A: It was in like a trader magazine.

Q: Do you, ah, the person that sold it to you, was he, did he use the truck for like work or was it just?
A: No, I believe it was more for leisure.

Q: I see. And how would you describe the vehicle when you bought it? I mean the overall condition of it?
A: Almost like new.

Q: How many miles did it have on it?
A: I believe it had 51 or 52,000 miles on it. If memory serves me right, I think.

Q: Okay, and you're saying the overall condition was very, very good then?
A: Yes sir.

Q: Had he ever, did you, I mean, I'm sure when you bought the vehicle, the typical kinds of questions you asked, had you had any problems, and this kind of stuff, did you ask those questions?
A: You know, we went just the typical stuff. If memory serves, he told me he had just purchased it but he had no, I don't remember him saying anything about any trouble with the truck.

Q: Do you remember asking those questions?
A: As far as what, any trouble?

Q: Yeah, you know, the history of it?
A: Well, I probably just made some kind of generalization like, have you had transmission trouble or engine or, you know. And he probably just told me right from the get-go, you know, it's been a good truck, I can't remember.

Q: Sure.
A: I would, if something, if he'd of had trouble with it, I probably would've remembered that and not even have bought it.

Q: Yeah, absolutely. Okay. Did he say anything about maybe having an extra warranty on it or anything like that?
A: No, there wasn't.

Q: Okay.
A: If he had one of his own he never mentioned it.

Q: Okay. You don't have one, right?
A: No.

Statement Of
Claim: [REDACTED]

Page 3

- Q: Have you had any significant work done on it since you bought the vehicle?
A: No. Nothing.
- Q: What, like where do you get your oil changes and things like that?
A: If I don't do them myself, I take them to, there's like a Speedy Lube there in Decatur.
- Q: But normally you do them yourself?
A: Well, you know, I'm not going to say normally, it just depends on how I feel.
- Q: Gotcha.
A: Sometimes I can just do it instead of, if you go up to these places on the weekend, they're pretty busy, you know, and I change quicker than that, but that's not to say I never go up there. That oil _____ only been changed once, probably twice and maybe three times since I owned it.
- Q: So you've owned it, let's see if I'm figuring this right, around eight months?
A: Yeah, it wasn't very long.
- Q: And how many miles did it have on it when the?
A: I'm thinking it was 81,000 and something cause the day that that thing caught fire, I remember looking to see how long it's been since I had the oil changed and the time that I had had it changed was by that Speedy Lube. The _____ sticker was on the window.
- Q: And about how long prior to the loss was it?
A: You know, I think I had close to 2,000 miles left on the oil and I usually get it done around 3,000 miles. Time wise, I really couldn't tell you, but it probably had around 1,000 to 1,500 miles on that.
- Q: On that oil change?
A: Right.
- Q: So, over the eight month period it sounds like you put about roughly 8 or 9,000 miles on your truck, is that about right?
A: Yeah, probably.
- Q: Okay, roughly 1,000 a month.
A: Yeah, I don't know, I've never really sat down and saw that.
- Q: Normally, nobody does think about these kind of things but, okay. What, how much fuel did you have in the vehicle when it caught fire?
A: It was full.
- Q: It was full. Okay
A: I washed it.
- Q: Okay. Before I forget, what Speedy Lube or whatever does your work? What?
A: There's about 4 or 5 of them in Decatur, Illinois and I usually use the one that's in South Shores and I don't remember the number. There all one through five or six, but whichever one is in South Shores is the one I use.
- Q: Okay. Had you had any of the other fluids worked on, you know, like transmission, power steering, brake, coolant any of that stuff? Had you added or flushed or changed any of those fluids?
A: You know, I don't remember putting anything in that truck.

Statement Of:
Claim: 

Page 4

Q: Basically it was pretty much when you bought it you've changed the oil a couple of times and that's about it?
A: Right.

Q: Okay.
A: You know, it never needed anything, and I don't remember them, they're usually pretty quick to point out if you got a leak or low coolant or something like that and I don't remember them bringing anything to my attention.

Q: Okay. Had you had any problems at all that you can recall?
A: None.

Q: Okay. Had you ever had any problems with, you know, like animals in your vehicle or, you know, anything, you know, like these rodents or anything building nests or anything like that under the hood?
A: No. Not, well, you know, I was asked that question once before, and then I got to thinking about it, now I had a truck prior to this one and on occasion, last year, a bird was trying to make a nest in it. But as far as that truck, I just looked at that thing, oh, I don't know, I had the hood up to check the oil, it wasn't too many days prior to _____, I didn't notice anything.

Q: You didn't notice anything?
A: No, but that truck, you know, we live out in the country and it did sit outside, so, I, you know, I can't rule anything out at this point, I tell you, I been racking my brain what the hell happened with that thing. I don't know. I was hoping that State Farm or whoever that is there that looked at it could shed some light on it.

Q: Sure.
A: I haven't heard nothing since then.

Q: Yeah. Had, was there any after market equipment on it. You know, like anything in the way of a cellular phone hookup. A CB radio, or a trailer hitch hookup. Anything electrical, mechanical, anything like that? Did you have any of that, any of that, any of those devices on your truck?
A: I put a Taconsha Electric trailer brake control on it and then I changed the trailer plug that was on there to one that would match my trailer.

Q: How long ago did you do that?
A: I done that right after I bought it.

Q: Oh, so roughly 7, 8 months ago?
A: Yeah.

Q: And that's it?
A: Yeah.

Q: Okay. And you did that work yourself?
A: Yeah.

Q: Okay. Do you know if the vehicle has ever been involved in an accident?
A: To my knowledge, no and I believe that's one of the questions I asked _____.

Q: Okay. And to the best of your knowledge, where did the fire start?
A: When I first seen the flames it was up inside the engine compartment viewed from the right front

Statement Of: [REDACTED]
Claim: [REDACTED]

Page 5

wheel well.

Q: Right front wheel well. Now what, what was the first thing that drew your attention to?
A: Well, when I was backing into the drive, I seen smoke. But we live out in the country and we burn our garbage. And the garbage was like to the west and the rear of my truck. I had thought, well, my wife had just burned the garbage that morning. Well, you know, I don't know, for whatever reason something just kind of clicked or something, stopped there and thought now well a minute, that smoke's too low and then about that time I heard kind of a hissing noise and the sun kind of just come through the window just right and it looked like there was smoke in the cab. That's when I shut it off, put it in park, got out, I seen that smoke, so I looked down underneath the wheel well up in front of it, seen those flames and my work truck was sitting right next to it and I carry a fire extinguisher on it. So I grabbed one of them, went back to my truck, which is probably a matter of 15 foot, went through one extinguisher, and still hadn't got all the flames out. So I went and got another one, came back, started using it, and then I heard a another odd noise. I looked up out from under the wheel well, the hood was bubbled up right above like where the intake was. Then all of a sudden it just kind of melted away or whatever, flames started shooting out of there and that's when I called the fire department.

Q: So when you were squirting these fire extinguishers, did you have the hood up at that time?
A: No.

Q: Okay, you were squirting it in where, at the wheel well?
A: Yes.

Q: Okay. And this hissing sound. Any other word to help describe that sound?
A: Well, it could have been like a hose that may had some pressure on it, you know just, kind of like an air hose, you know how?

Q: Okay, sure.
A: Something, it was just a noise that you don't hear. And, but I kind of became aware, it must've been the truck by that time, and like I say, I could see smoke, it wasn't a whole lot of smoke in the cab, it was just enough that the rays of the sun kind of picked them up.

Q: Did you think about raising the hood when you saw this smoke?
A: Well, not really, because, when I first seen it, I thought, you know, is that in my tail pipe? I looked at my gauges, everything looked right and I thought, well this engine must've goofed up. But then, I don't know, I just, I, like I said, I shut it off and got out just to kind of investigate and cause the smoke was low like it was coming from down low. It didn't even dawn on me to open the hood up.

Q: What color was the smoke?
A: What I seen when I first backed into the drive, was like a bluish-white.

Q: Bluish-white.
A: Yes.

Q: Okay. And you were, like you said, you were backing the vehicle into the drive. You didn't have it hooked up to like a trailer or anything like that?
A: No.

Q: Did you have any of the other devices in your vehicle on like lights, air?
A: The radio possibly could've been on. As far as the lights, they wouldn't have been, but that thing

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had those daytime running lights on so they probably was on until I shut the ignition off.

Q: Sure.

A: And as far as the heater, I want to say that I didn't have it on, you know, it was a nice day out, I don't know why that I would've.

Q: Okay. So, it sounds like basically, you had the radio on and those lights then, that was it.

A: Yeah.

Q: Okay. Okay, did you, did you happen, or have you noticed anything over the time with the vehicle, any kind of fluids on the ground or anything? I know that some of these questions overlap and they're sort of redundant, but, had you noticed anything in your driveway or anything like that?

A: No. That truck had a real dry engine on it.

Q: Okay.

A: It wasn't leaking or anything.

Q: So basically, no warning lights on your dash? You didn't notice any lights come on your dash prior to the fire, or anything like that?

A: No, and like I say when, there was a point there where I thought maybe that the smoke was coming out of my exhaust pipe cause it was on the same side.

Q: Sure.

A: And I just looked down to check the gauges and I mean, everything was, it wasn't hot, the oil pressure was fine, and

Q: Okay. Did, was the, did the fire, did the burning, did it have any smell to it?

A: You know, I thought later that I smelled oil burning, but you know I don't, it's one of those things you wonder if you dreamt it or.

Q: After it's all over?

A: Yeah. The windows would've been up on that side of the truck that the smoke was on, course, now what I know of it I probably wouldn't have got it inside the cab through the window anyway because the smell being on the front and the wind was from the back of the truck blowing that direction, but, like I say, I think I just got a faint smell of oil burning but, you know, I couldn't really

Q: Okay. Okay. And did the fire department, when they were out there, did anybody speculate on what they thought it was?

A: I don't know, I think there was a couple of guys out there that, you know, said an oil line burst or, you know, maybe a gas line, I don't know. I never smelled gasoline at all. But as far as anybody able to find something and say, well this is what it was, no, nobody. It's not to knock the fire department, the volunteer fire department, I know a lot of the guys, you know. I think it was just mostly conversation, but, I don't know, the chief come around, I had to give him a VIN number because the tag, he couldn't read it where it was on the dash. He never said anything, you know, as far as what he thought it might be.

Q: I see. Did the fire department take any photographs of their own?

A: You know, I'm thinking that somebody was out there with a camera, but, whether it was a movie camera or a still picture camera, I'm not sure and

Q: But you don't know who that was?

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A: Well, I think it was a kid named, I say a kid, he's older than a kid, I think it was [REDACTED] but, you know, I don't know, it was a pretty exciting day so I could be wrong about that.

Q: [REDACTED] is who?

A: He just a fireman.

Q: Oh, he belongs to the, so it was somebody on the volunteer fire department?

A: Right. Right.

Q: Okay.

A: I'm thinking, like I say, there was quite a few guys out there and seems to me I remember somebody standing there taking pictures but I never did ask.

Q: Okay.

A: I know that the fire chief was filling out a report, but what he wrote on it, I'm not sure, other than the fact I give him, I think I had to tell him who my insurance agent or insurance company was and then the VIN number. I believe that's about all he asked me about.

Q: Did you have any, you know like, items in the vehicle, other than, you know, like registration and those kinds of things. Did you have anything in the bed of the truck or in the glove box, like magazines or anything like that?

A: No. The only thing I would've had in the glove box would've been the owner's manual and possibly one or two maps. I had some incidental personal things. I think I had a couple of pairs of glasses, some gloves, there was two flashlights in there. The back of the truck had like a Rubbermaid type container I kept stuff I didn't want to have flying around the bed like a pulling chain in there or tow chain or whatever you want to call it. Some tie down straps, maybe another pair of glove or something. And I had three bicycles back there. All that stuff is recoverable.

Q: Oh, okay. All right.

A: But in the front, I think also I had a raincoat underneath the seat, but.

Q: Do you smoke?

A: No.

Q: Okay. On the day of the accident had anybody driven the vehicle just prior to you?

A: No. I was the only one in it that day.

Q: How about within the week previous to that?

A: No. I really can't remember the last time anybody drove it other than me.

Q: Okay. Does anybody have a set of keys other than you?

A: Well, my wife would. We just keep another set of keys in the house, but as far as somebody else having a set, no.

Q: Okay. All right. Is there anything else about this whole scenario that I haven't touched on that you would like to comment on at this time?

A: Oh, no, other than the fact that it would be interesting to know just what caused this, but

Q: Had you any recent muffler work done or anything like that?

A: No, everything was original on it. No.

Q: Okay.

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A: My _____ require, the company I work for has a lot of Ford pickup trucks and no I kind of thought maybe there was a recall. I didn't _____. As far as I know with the truck we got, the recall that they may have had nothing to do with any kind of fire hazards.

Q: What recall was that?

A: I, you know, I don't remember. I think my boss said he had a couple but, you know, I don't remember if he told me what they were. I don't, you know, casual conversation, I don't remember him saying anything, yeah there was this that caused the fire or, but

Q: Okay. When you, when you, the only thing now that basically that you did that was electrical to the vehicle is the trailer hitch mechanism, is that right?

A: Right. There was the electric brake controller, and then like I say, I changed the actual female type plug at the rear of the truck so the trailer can plug into it.

Q: And this brake controller. That operates from within the cab, is that right?

A: Yeah, it mounts up on the dash and it, like when you actuate the truck brake, this thing sends a signal if you want to call it that, it's 12 volts to the trailer brakes to set _____.

Q: I see. And like you said that that had been put on shortly after you purchased the vehicle.

A: Right. That particular truck had, what Ford calls a tow package on it and all you have to do with that is mount your controller in there and they have got the wiring in place already. You just put the adapter in there, wire it up to your controller and you're good to go.

Q: I see. And the controller, the mechanism that you bought, was that a, was that a Ford mechanism or was it an aftermarket?

A: It's an aftermarket. I don't know if Ford makes one. Name brand was Taconaha.

Q: Taconaha. Okay.

A: We use them at work.

Q: And this was to tow what? What did you have that you

A: I've got a, like a flat bed type trailer.

Q: Oh, I see.

A: Yeah.

Q: You just haul stuff around and that kind of thing?

A: I got, we put a water tank on it. In the summer time, it gets real dry we have to haul water.

Q: Oh, I see, okay. And the last time you done that prior to the fire was when?

A: It was back, before the first of the year. I'm going to say, probably, I think we start getting some rain probably in November maybe. I'm not, well, I'm not real sure on that I. I'll tell you, I been hauling water so dang long I can't remember from one year to the next. It's been awhile because we've gotten significant amounts of rain that I _____ three months.

Q: Okay. But you have never had any problems with the operation of that unit?

A: No.

Q: Okay. Okay. Well, I think, I think we pretty much covered everything. Let's see. Okay. I'm going to ask you once again, _____ if you been aware that this conversation has been recorded?

A: Yes sir.

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- Q: And everything you've stated is true to the best of your knowledge.
A: To the best of my memory and knowledge, it is.
Q: Okay. This concludes the recorded interview.

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