

**PE04-078**  
**FORD**  
**1/28/2005**  
**ATTACHMENT F**  
**BOOK 8 OF 12**  
**PART 3 OF 6**



FD-302 (Rev. 11-27-70) C 3182

BEGINNING OF CONTACT  
 09/18/2001 MASTER OWNER RELATIONS SYSTEM III 09.10.13

CONCERN ISSUE CASE NBR: 1381732601  
 REGION: 10 SDR ZONE: L1 OPENED: 09/17/2001  
 VIN: 2FTRF16W0Y ENGINE: M VEN TYPE: T CLOSED:

LAST NAME: STATUS: OPEN  
 TITLE: FIRST NAME: NC:  
 ADDRESS: CITY: ALPENA STATE: MI ZIP:  
 HOME PHONE: MODEL YEAR: 2000 MODEL: F150 4X4 STYLESIDE PICKUP  
 RELEASE: 20000  
 DEALER NAME: ALPENA FORD LINC-NE SALES CODE: F48599 P & A: 09612  
 REASON CODE: 0792 LEGAL - ACCIDENT / FIRE  
 SYMPTOMS: 202100 WIPER/WASHER WINDSHIELD

ORIGIN: CAC138 - US CONCERN CASE BASE COMMUNICATION: PHONE  
 ACTION: 719 - ADVISE CUST INFORMATION WILL BE SENT TO CONSUMER AFFAIRS  
 DOCUMENT: ANALYST: JANGCO JAMES ANGCO  
 ACTION DATA/COMMENTS:

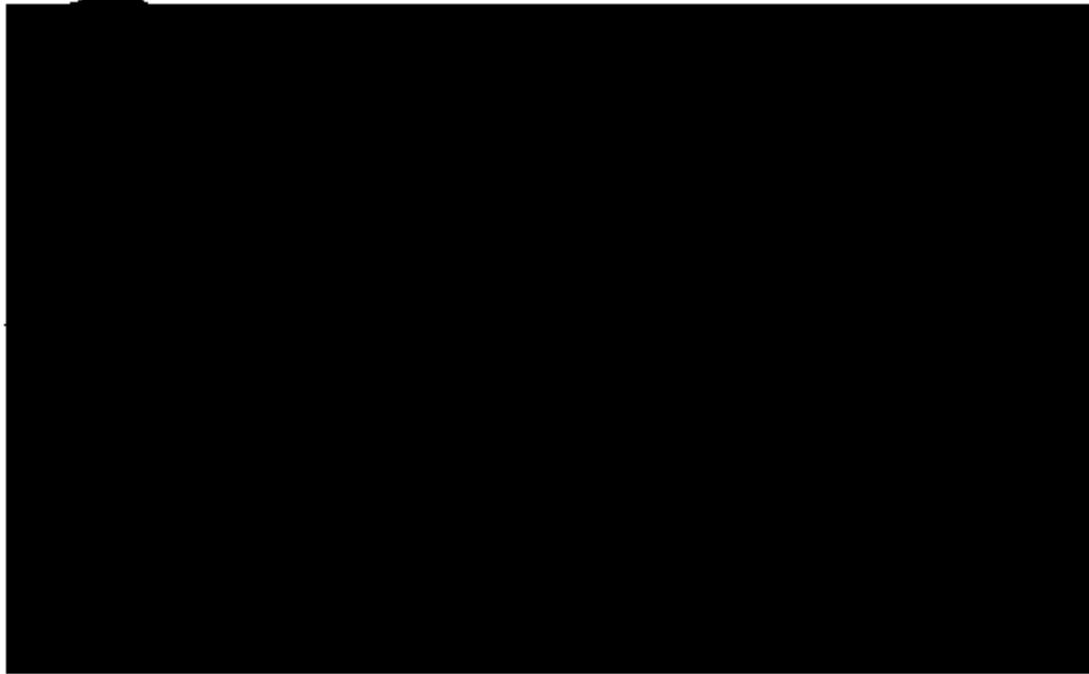
2001/09/17  
 10.34.06 FIRE/ACCIDENT D  
 CUSTOMER SAYS: - VEN CAUGHT ON FIRE DUE TO THE WIPER RECAL  
 L SEPT 15TH - FIRE CAUSED IN WIPER MOTOR - NO FIRE DEPT OR  
 INSURANCE CALLED/NOTIFIED - THERE WAS SMOKE THAT FILLED IN  
 E CAB - CUST WANTS TO KNOW WHO WOULD COVER ADDITIONAL EXPEN  
 SES LIKE THE FABRIC THAT MIGHT SMELL LIKE SMOKE PER CUSTOME  
 R, DEALER SAYS: - ALPENA FORD CAC ADVISED: - I WILL FORW  
 ARD THIS INFORMATION TO OUR CONSUMER AFFAIRS GROUP. SOMEBO  
 Y FROM CONSUMER AFFAIRS WILL CONTACT YOU IN 7- 10 BUSINESS D  
 AYS. PLEASE NOTIFY YOUR INSURANCE CARRIER AND REPORT THIS I  
 NCIDENT. INFERENCE CASE ID: 9349



9/19/01  
 -F102 (w/ins: 10/1/01?)

OWNER RELATIONS 09/18/2001 MMFANPRG

PERM-078 C 3183



PEB4-878 C 3184



**SELECTIVE**  
Insurance

John Olsyn  
P O Box 783  
Branchville, NJ 07828-0783  
Tel: 800-777-9656  
Fax: [INPUT]  
John.Olsyn@selective.com



October 23, 2001

FORD MOTOR CO  
OFFICE OF THE GENERAL COUNSEL  
PARKLANE TOWERS WEST STE 400  
3 PARKLANE BLVD  
DEARBORN MI 48126

Re: Insured: [REDACTED]  
Claimant: Ford Motor CoCompany Inc Dba Roman Plumbing &  
Claim #: [REDACTED]  
D/L: 4/20/2001

Dear Sir or Madam:

Please accept this letter as notice of our subrogation claim.

Our insured's 2000 Ford F150 Vin# 1FTPF17L5YM [REDACTED] total loss due to fire. The cause of fire was determined to have been the result of a fuel system failure.

It is our contention that reimbursement of damages should be made to Selective Insurance Company of America under the terms of the extended warranty which was in effect at the time of this loss, or if choose, as a liability claim.

Please advise the undersigned of your position in this matter as soon as possible, or if you have any questions or if you require additional information, please feel free to contact me at the above number.

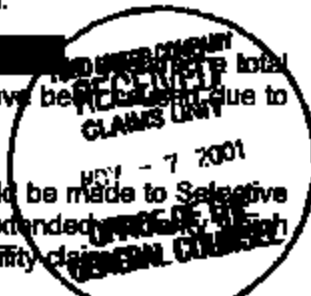
Sincerely,

John Olsyn

Claim Representative

Enclosure

- F106  
- 4/20/01  
- 100 F-150  
GA



# BURES CONSULTANTS, INC.

297 Front Street  
Berea, Ohio 44017

Phone: 440-816-0525    Toll free: 800-462-5822    Fax: 440-816-0491

July 11, 2001

Mr. Bill Bracken  
Selective Insurance  
17030 East River Road  
Columbia Station, Ohio 44028

re:   INSURED:                   ROMAN PLUMBING  
      TYPE OF VEHICLE:       2000 Ford F-150 pick-up truck  
      DATE OF LOSS:           April 20, 2001  
      CLAIM NUMBER:         [REDACTED]  
      OUR FILE NUMBER:       [REDACTED]

Dear Mr. Bracken:

This report is in regard to the inspection of a 2000 Ford F-150 pick-up truck bearing Vehicle Identification Number 1FTPF17L5YN [REDACTED]

On June 4, 2001, this office was requested to inspect the subject vehicle and determine the origin and cause of the vehicle fire. We were informed the vehicle was being operated at the time of the fire. The driver, Tom Kocantz, was informed by a motorist that the vehicle was on fire.

Vehicle recalls and technical service bulletins were researched for this vehicle. During the course of my investigation, all relevant bulletins were considered for my evaluation of the subject fire. There were no 'open' recalls at the time of this report. A complete list of factory technical service bulletins and a recall list will be forwarded with this report.

This investigator contacted a local Ford dealer and discovered there were no open/incomplete recalls assigned to this vehicle. Furthermore, this vehicle is covered under an extended warranty with an expiration date of November 11, 2006, or 100,000 miles, whichever comes first. The transmission was repaired on March 9, 2001, and the mileage at the time of the repair was 49,980 miles.

FED4-878 C 3186

A positive identification of the subject vehicle was made with the use of the Vehicle Identification Number 1FTPF17L5Y [REDACTED] as seen in Photo #1.

The investigation of the vehicle began by initially observing the vehicle and determining the probable area of fire origin. Examination of the vehicle revealed that the fire did not originate in the vehicle interior, the rear storage area, or the undercarriage. The patterns of damage and remaining evidence revealed that the fire originated in the vehicle engine compartment.

The subject vehicle is equipped with a 5.4 liter, V-8 fuel-injected engine and a four (4) speed automatic transmission.

The subject vehicle was equipped with four (4) Goodyear Wrangler AP LT245/75R16 tires. All of the vehicle tires were mounted on factory steel wheels. Inspection of the vehicle tires found them safe for highway use prior to the fire. Heat and fire damage were noted to the vehicle front tires.

The subject vehicle brake assemblies were inspected and eliminated as the cause of this vehicle fire.

The exterior of the subject vehicle can be seen in Photos #2 through #7. The greatest amount of heat and fire damage were noted to the front of the subject vehicle. A close inspection of the vehicle body panels found them to be free of crash damage. All combustible materials in the area of the exterior had been severely attacked by fire.

Inspection of the wiring for the vehicle front lights and the remaining wiring located in the area of the vehicle core support were inspected and found to be free of faults, failures or arcs that could have caused this vehicle fire. There was no after market lighting found in this area of the vehicle, or under the vehicle. The remaining evidence clearly shows the greatest amount of fire damage was in the area of the passenger side of the engine compartment.

Inspection of the fire damaged fuel fill area, as seen in Photo #4, clearly shows the fire attacked this area of the vehicle. Inspection of the fuel cell and the combustible fuel lines located under the subject vehicle found them to be free of faults or failures that could have caused this vehicle fire. However, it is our professional opinion, based on the remaining evidence, the

combustible fuel lines were attacked by fire, thereby increasing the fuel load for this fire.

Photos #8 and #9 show the fire damaged truck bed area. Inspection of this area of the vehicle found it to be free of faults or failures that could have caused this vehicle fire. However, it is our professional opinion, based on the remaining evidence, the contents of the truck bed, such as propane cylinders, were attacked by fire, thereby increasing the fuel load for this fire.

The subject vehicle was equipped with a trailer hitch and a trailer hitch wiring harness. Inspection of the remains of the electrical wiring in the rear of the subject vehicle, including the trailer hitch wiring harness, found it to be free of faults or failures that could have caused this vehicle fire.

Photos #10 through #20 show the vehicle engine compartment and various engine compartment components. My inspection of the remains of the subject vehicle engine and the transmission assembly found they displayed no signs of oil leakage that could have caused this vehicle fire. All combustible material in this area had been attacked by fire. It is our professional opinion, based on the remaining evidence, the greatest amount of fire damage was noted to the passenger side of the engine compartment in the area of the bulkhead.

The engine oil level and the transmission fluid level, as seen in Photos #12 and #13, were found to be at a safe operating range.

Photos #10, #11 and #14 show the vehicle engine compartment, viewed from the front looking rearward. The fire damage noted to the remains of the cooling system rubber hoses clearly shows the fire originated on the passenger side of the engine compartment and then attacked these combustible items.

A systematic and meticulous inspection of the engine compartment electrical wiring, the electrical components and the remains of the vehicle battery, found them to be free of faults or failures that could have caused this vehicle fire.

Inspection of the vehicle core support area, as seen in Photos #15 and #16, found the electrical wiring to be free of faults or failures that could have caused this vehicle fire. The limited fire damage noted to the aluminum radiator clearly shows the fire did not originate in this area of the vehicle.



Inspection of the remains of the vehicle starter motor solenoid assembly, as seen in Photo #17, found it to be free of faults or failures that could have caused this vehicle fire.

Inspection of the remains of the vehicle alternator assembly, as seen in Photo #18, found it to be free of faults or failures that could have caused this vehicle fire.

Inspection of the remains of the vehicle under hood fuse/relay center assembly, as seen in Photos #19 and #20, found it to be free of faults or failures that could have caused this vehicle fire.

The transmission cooler lines and the automatic transmission assembly were inspected and found free of faults or failures that could have caused this vehicle fire.

Inspection of the vehicle starter motor assembly and the positive battery cable found them to be free of faults or failures that could have caused this vehicle fire.

Inspection found that the vehicle was not equipped with an after market remote start system or an after market alarm system.

Inspection of the fire damaged interior, as seen in Photos #21 through #35, found it to be free of faults or failures that could have caused this vehicle fire. The fire damage noted to the vehicle interior, in our professional opinion, was the result of the fire having breached the vehicle windshield and the bulkhead on the passenger side. The remains of the wiring insulation noted to the dashboard electrical wiring clearly shows the fire did not originate in this area of the vehicle.

Inspection of the vehicle glass found all of the glass had been fire damaged. Inspection of the remains of the passenger side window regulator found it had been in the 'UP/CLOSED' position at the time of the fire. The driver's side regulator was found to have been in the 'DOWN/OPEN' position at the time of the fire.

Inspection of the vehicle interior found the vehicle was not equipped with power seats, power door locks, power mirrors or power windows that require additional current to operate.

The vehicle interior was inspected to ensure that there was no after market electronic sound system equipment that had been improperly installed into the vehicle wiring harness. NO such equipment was found.

A sample of the interior debris was removed and is being retained as evidence, as seen in Photo #33.

Inspection of the storage area rearward of the vehicle seats, as seen in Photos #34 and #35, found it to be free of faults or failures that could have caused this vehicle fire.

My inspection of the remains of the subject vehicle interior found no evidence whatsoever to support a theory that this fire may have been caused by the accidental discarding of smoking materials.

A study of the fire damage noted to the passenger side of the vehicle found evidence of flame impingement to the passenger side of the bulkhead down the bulkhead to the area of the passenger frame rail, as seen in Photos #36 through #40. It is our professional opinion, based on the remaining evidence, this fire most probably resulted because of an unexpected leak in the fuel-delivery system within the engine compartment. It is our professional opinion, based on the remaining evidence, that fuel leaked down the bulkhead on the passenger side under the vehicle and the fuel vapors ignited in the area of the exhaust system.

This investigator cannot say with scientific certainty if this fire was the result of a product defect, a manufacturer's installation defect, or if the fuel lines may have been damaged at the time the vehicle transmission was overhauled.

Following a thorough and complete evaluation of all remaining evidence in this case, and based on our knowledge, training and years of experience, as well as my personal knowledge of this vehicle's fuel delivery system, it is my professional opinion this fire was the result of a fuel system failure. Fuel vapors collected in the area of the exhaust system and the hot engine and ignited, which caused catastrophic fire damage to this vehicle.

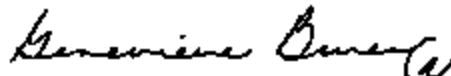
All other possible causes for this vehicle fire were considered, investigated and eliminated.

If we can be of any further assistance to Selective Insurance Company in this matter, please feel free to contact us at any time.

Respectfully submitted,



VICTOR A. DONATELLI  
Forensic Mechanic  
ASE Certified Master Technician  
Licensed Investigator  
Ohio License #6851



GENEVIEVE BURES, C.F.I.  
Certified Fire Investigator  
Licensed Investigator  
Ohio License #6851

FE84-878 C 3180

INSURED:

CLAIM NO.:

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ADJUSTER:

DATE:

PAGE OF PAGES

ACT. NO. 116

INSURED:

CLAIM NO.:

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ADJUSTER:

DATE:

PAGE 01 PAGES

ACD 122A (11-92)

PE84-87B C 3192

INSURED: \_\_\_\_\_

CLAIM NO.: \_\_\_\_\_

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ADJUSTER: \_\_\_\_\_

DATE: \_\_\_\_\_

TIME: \_\_\_\_\_

PLACE: \_\_\_\_\_

ACD 12-A (11-79)

INSURED:

*Roman Plumbing Co. Inc.*

CLAIM NO:

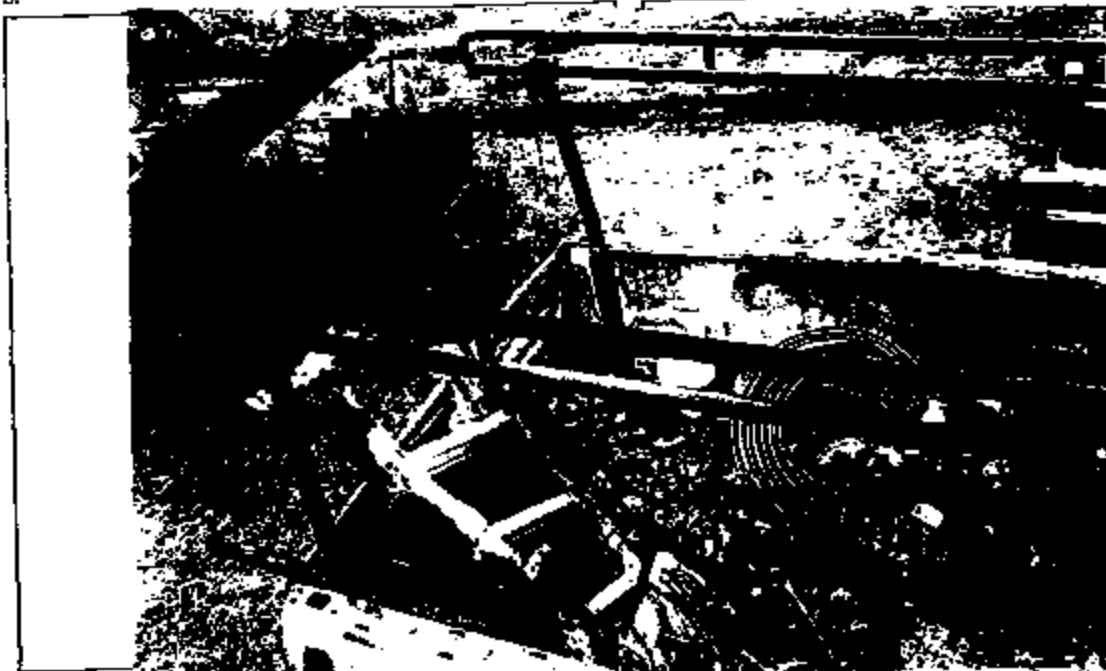
*100-11-10*

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ADJUSTER:

DATE:

*1/7/70*

PAGE 01 OF 01

PERM-878 C 3184

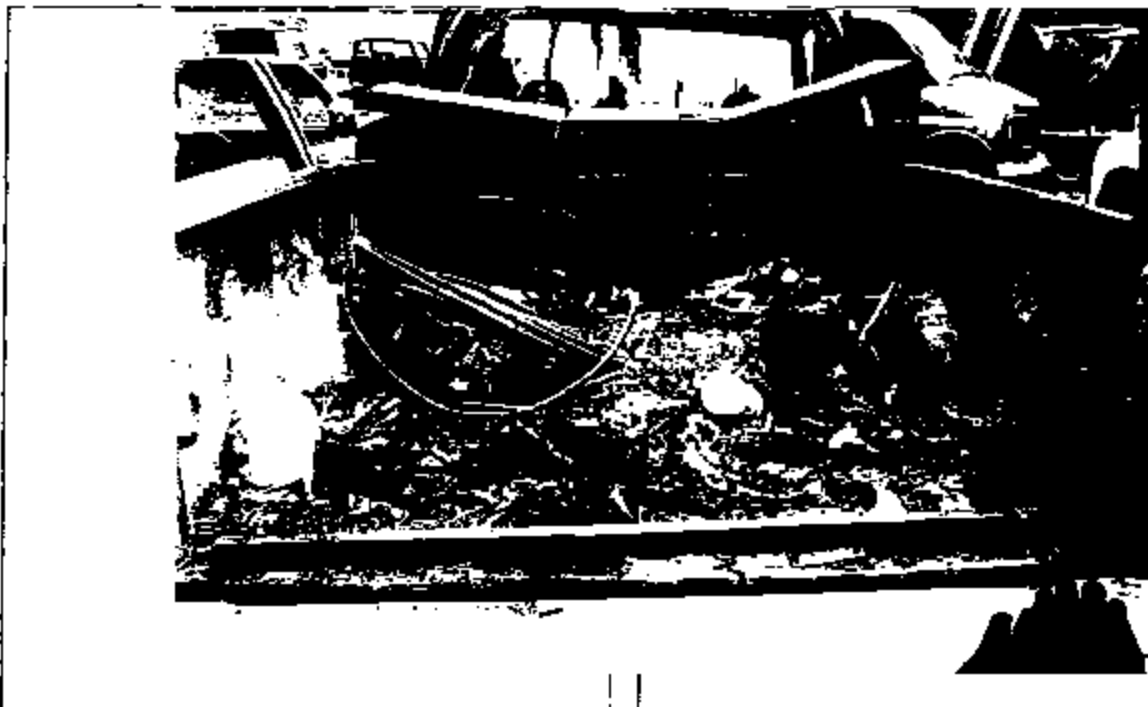
INSURED:

*Roman Plumbing Co. Inc*

CLAIM NO:

*100-701-111*

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ADJUSTER:

DATE: / /

PAGE OF PAGES

INSURED:

*Roman Plumbing Co. Inc.*

CLAIM NO.:

*100-11-101*

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ADJUSTER:

DATE: / /

PAGE 01 OF 01 PAGES

ACD-127X (11-80)

PE84-878 C 3196



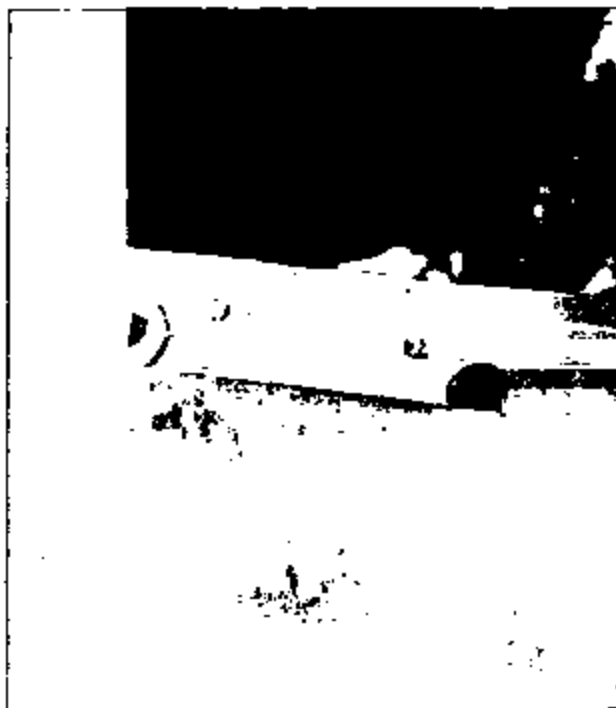
INSURED:

*ROMANO PLUMBING Co Inc*

CLAIM NO:

*100 59 597*

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ADJUSTER:

DATE: / /

PAGE OF PAGES

ACD 122A (11-50)

PE04-878 C 3197

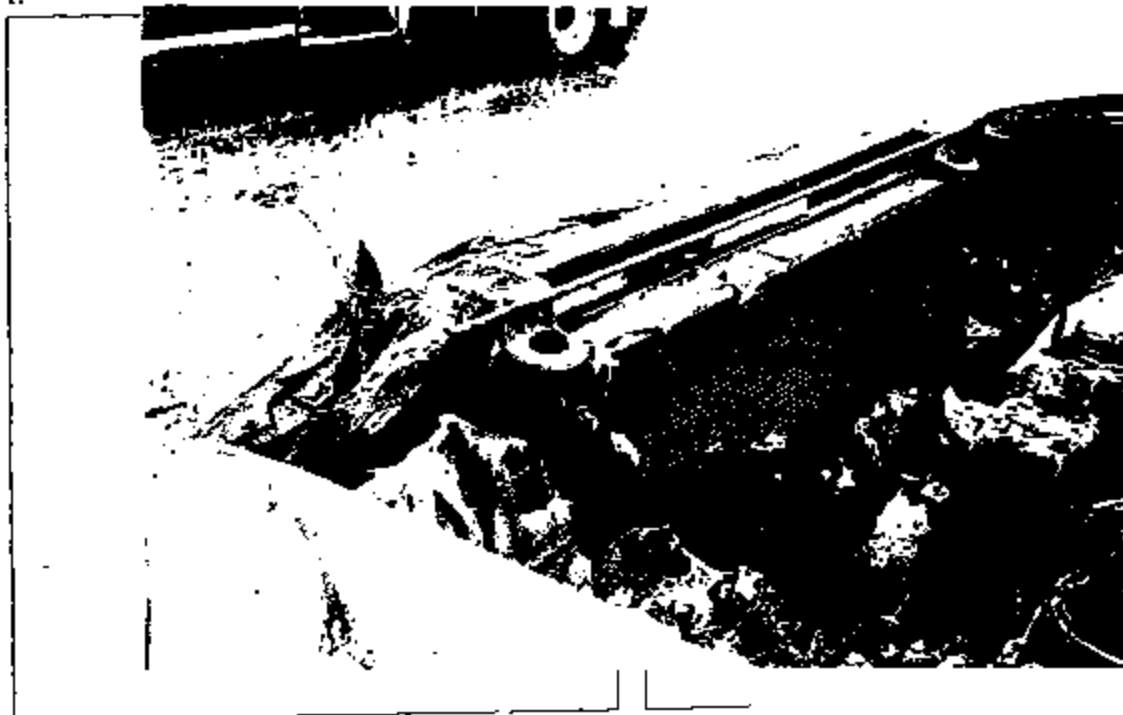
INSURED:

*Roman-Delmarly Co., Inc.*

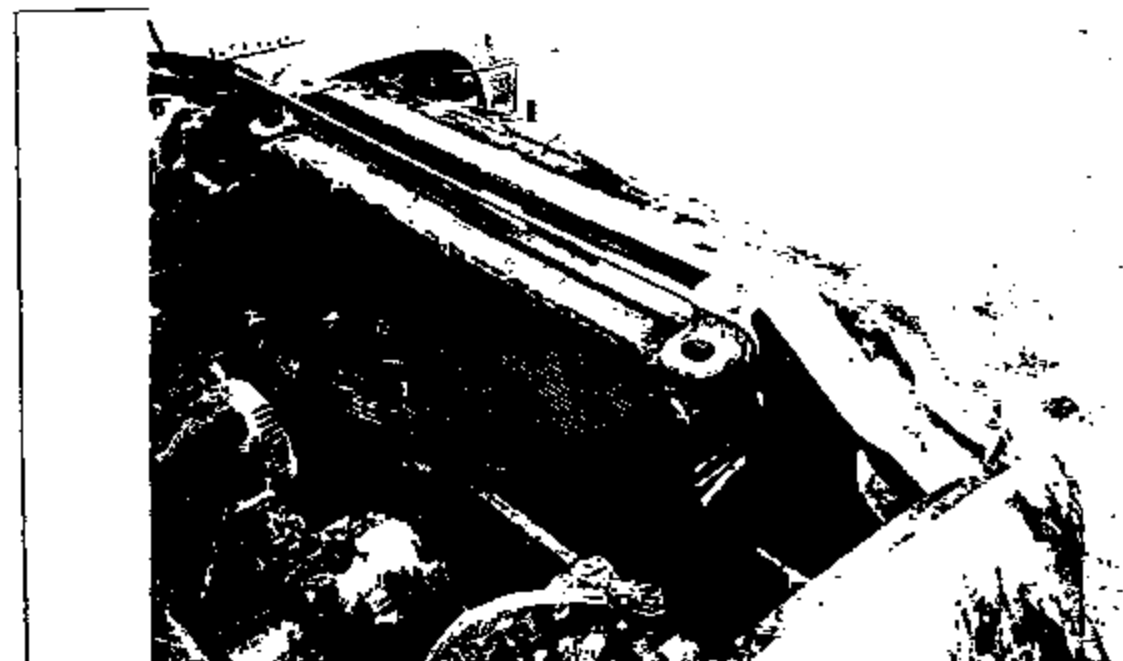
CLAIM NO.:

*200 97 571*

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ADJUSTER:

DATE:

PAGE OF PAGE

ACU-177A II '88

PERA-07B C 3198

INSURED:

*Robert J. ...*

CLAIM NO:

*...*

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ADJUSTER:

DATE:

PAGE OF PAGE

PE84-878 C 3159

INSURED:

*ROBERT J. MURPHY, JR.*

CLAIM NO.

*100-10000*

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ADJUSTER:

DATE:

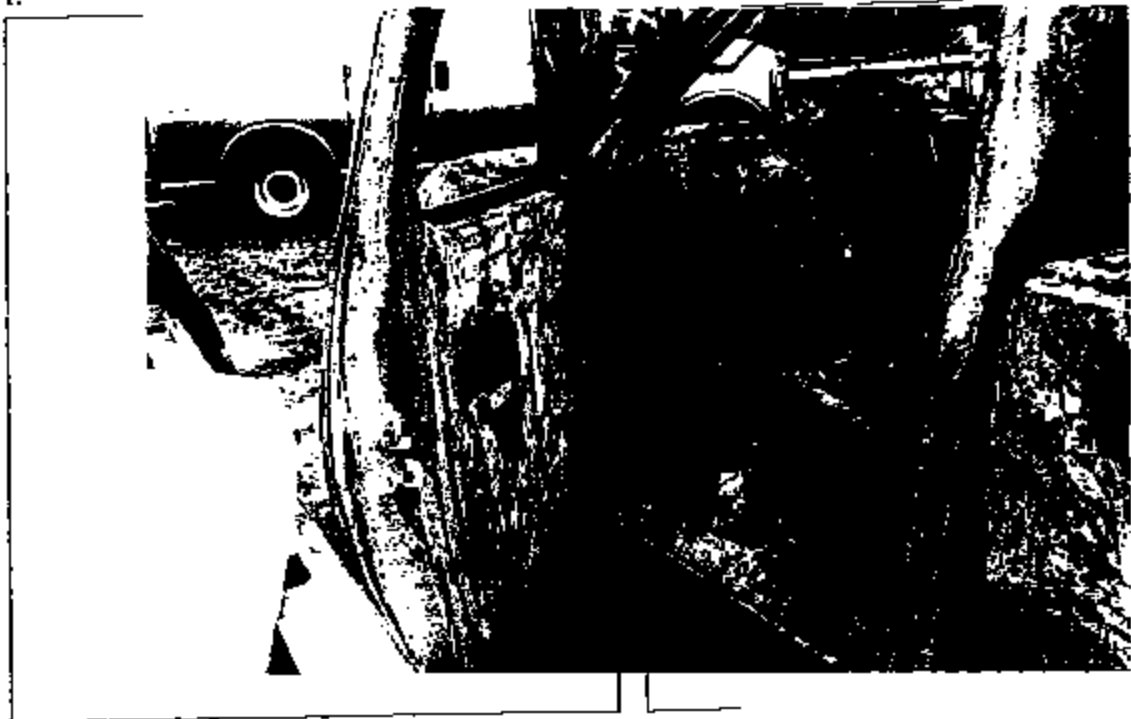
PAGE OF PAGES

ACD-122A (11/80)

PE04-076 C 3200

INSURED: Roman Plumbing Co. Inc CLAIM NO: 100-1937

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ADJUSTER: \_\_\_\_\_

DATE: 2/7 PAGE OF PAGE

# Selective

INSURED:

Roman Plumbing Co. Inc.

CLAIM NO:

100-11-111

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ADJUSTER:

DATE: / /

PAGE 00 PAGE

ACU-122A (11.50)

PE04-876 C 3262

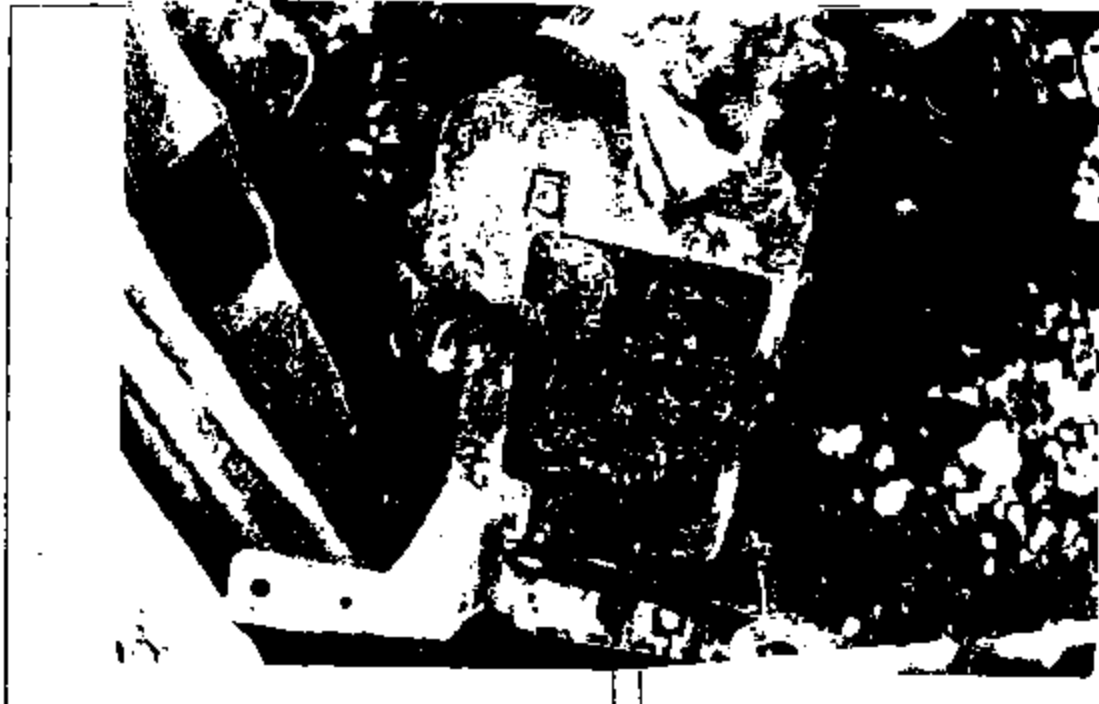
INSURED:

*Roman Property Co. Inc.*

CLAIM NO.:

*100-1000*

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ADJUSTER:

DATE: / /

PAGE OF PAGE

INSURED:

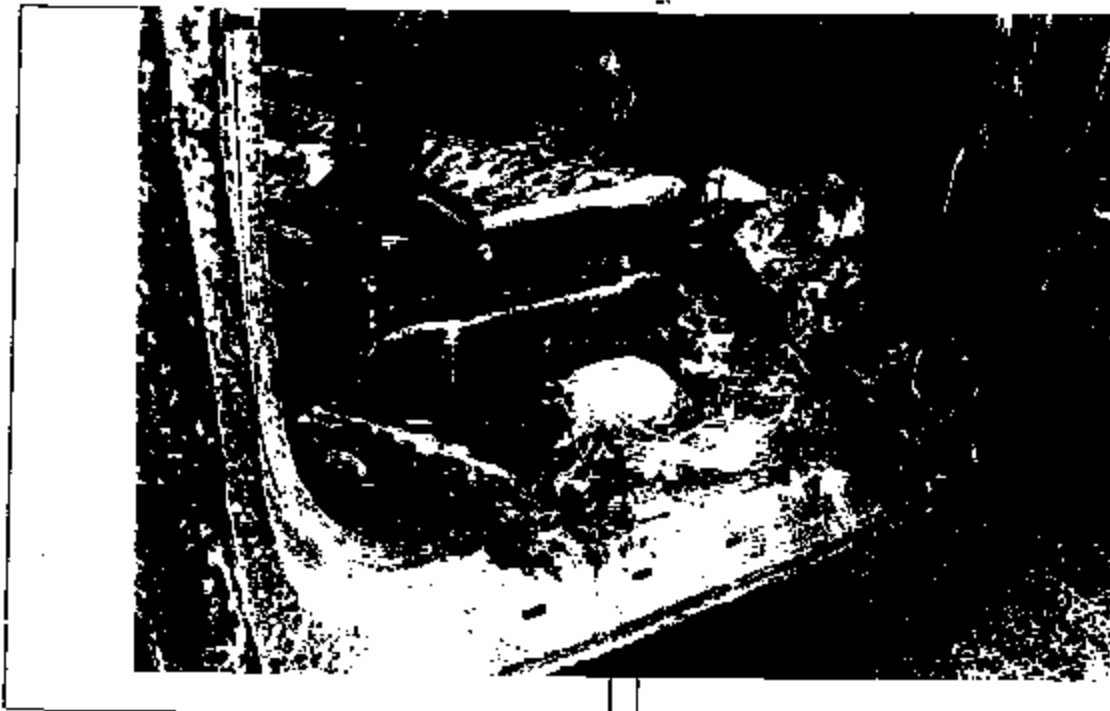
*Roman Plumbing Co Inc*

CLAIM NO:

*100-1111*

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ADJUSTER:

DATE:

PAGE OF PAGE:

ACD-122A (11-80)

FE04-078 C 3204



INSURED:

*Roman's Plumbing Co. Inc*

CLAIM NO.:

*200-01-01*

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ADJUSTER:

DATE

PAGE OF PAGES

ACD 121A (11-90)

FE84-878 C 3285

INSURED:

*Roman Plumbing Co Inc*

CLAIM NO:

*100 4441*

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3.



ADJUSTER:

DATE:

PAGE OF PAGES

ACD-132A (11-83)

FE24-878 C 3286

INSURED:

*Roman Plumbing Co Inc*

CLAIM NO:

*200-11-11*

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ADJUSTER:

ACD 122A (11/50)

DATE:

*1 / 1*

PAGE 01 PAGE

INSURED: *Roman Plumbing Co. Inc* CLAIM NO: *100-1111*

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ADJUSTER: \_\_\_\_\_

DATE: / /

PAGE OF PAGE

INSURED:

*Roman-Plumbing Co Inc*

CLAIM NO:

*20079245*

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ADJUSTER:

DATE: / /

PAGE OF PAGES

AGD 173A (11-00)

PE84-878 C 3289

INSURED:

*Roman Plumbing Co. Inc*

CLAIM NO:

*200-0101*

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ADJUSTER:

DATE: / /

PAGE OF PAGES

ACD-422A (11-90)

PEB4-878 C 3210

INSURED:

*Roman Plumbing Co Inc*

CLAIM NO:

*100-10000*

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ADJUSTER:

DATE: *1 / 1*

PAGE 01 OF 003

ACD 123A (11-90)

PE64-878 C 3211

INSURED: *ROMAN PLUMBING Co INC* CLAIM NO: *100-57578*

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ADJUSTER: \_\_\_\_\_

DATE: *1 / 1*

PAGE OF PAGE





SMITH, ROLFES & SEAVDAHL COMPANY, L.P.A.

ATTORNEYS AT LAW

MATTHEW J. SHAW\* †  
JEROME F. ROLFES  
DIANE E. SEAVDAHL\*\* †  
THOMAS F. GLASSMAN †  
M. ANDREW SWAY  
PATRICIA J. THOMAS\*\*\*  
JAMES P. NOLAN, II  
JOHN A. FROGG, JR.  
CARMEN C. BARDI †  
MICHAEL E. JACOBS †  
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1014 VINE STREET, SUITE 2850  
CINCINNATI, OHIO 45202-1110  
TELEPHONE: (513) 578-0080  
TELE-FAX: (513) 578-0222  
SROLFES@smithrolfes.com

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50 W. HIGDON STREET  
SUITE 5000  
COLUMBUS, OHIO 43215  
TELEPHONE: (614) 489-7180  
TELE-FAX: (614) 489-7148

ADMITTED TO PRACTICE  
OHIO  
† KENTUCKY  
\* FLORIDA  
\*\* WASHINGTON, D.C.  
\*\*\* CALIFORNIA  
\*\*\* ILLINOIS

www.smithrolfes.com

PLEASE REFER TO

April 17, 2002

Columbus  
asway@smithrolfes.com

Ms. Shawn Norton  
Claims Analyst  
Ford Motor Company  
Parkland Towers West, Suite 300  
Three Parklane Boulevard  
Dearborn, Michigan 48126-2566

RE: Claimant: [REDACTED]  
My client: [REDACTED]  
Claim No. [REDACTED]  
Date/Loss: 4/20/01  
Damages: \$13,204 (includes \$1,000 deductible less any salvage)  
Our File No. 02-5160

cl 2/02

- 4/13/2004 -  
- Canton, OH -  
~ 51,000 (100)

Dear Ms. Norton:

This law firm has been retained by [REDACTED] to pursue subrogation recovery of damages paid resulting from a fire which occurred in its insured's 2000 Ford 150 on April 20, 2000. Upon review of the file materials received, it appears you had been communicating with [REDACTED]. Since our firm has now been retained in this case, I would appreciate all further communications be directed to my attention.

I have reviewed your November 13, 2001 letter to [REDACTED] and in order to allow you to evaluate this claim, will attempt to provide you with as much information as possible, in the format you requested:

- 1. Date of Incident: 4/20/01 on southbound I-77 near the Canton/Akron Airport, Canton, Ohio;
- 2. Description: Roman Plumbing Co., Inc. driver traveling on southbound

Ms. Shawn Norton  
April 17, 2002  
page 2 of 2 pages

- I-77 near the Canton/Akron Airport and was advised by another driver the vehicle was on fire;
3. Fire Incident Report: Shall supplement to the extent one exists;
6. Mileage: Mileage on date of loss could not be determined; however, mileage as of 3/9/01 was 49,980;
7. Photographs: Black and whites provided. Shall supplement color photographs;
11. Documentation: See enclosed reports;
12. Repairs: Vehicle determined total loss and is being preserved;
13. Present location: Copart  
Route 351  
Ellwood City, PA 16117
14. Repair Estimates: See enclosed;
15. Service History: Transmission repaired on 3/9/01 at Wendell Ford in Waynesburg, Ohio;
16. After market parts: None;
21. Engine: Engine was running;
22. Keys: Keys were in the ignition;
23. Purchase: Vehicle was purchased new during November, 1999 at Fulton Ford, Inc., 2309 Locust Street SE, Canal Fulton, Ohio 44614.

As you will note, the vehicle is presently being preserved. No component parts have been removed from the vehicle. In the event your company is unwilling to accept liability for this incident, please be advised that our expert does intend to conduct further investigation of the subject vehicle. If a representative of Ford Motor Company wishes to be present during this examination, please advise who will be attending and their availability in the next 30 days. I am also advising a representative of Wendell Ford of same.

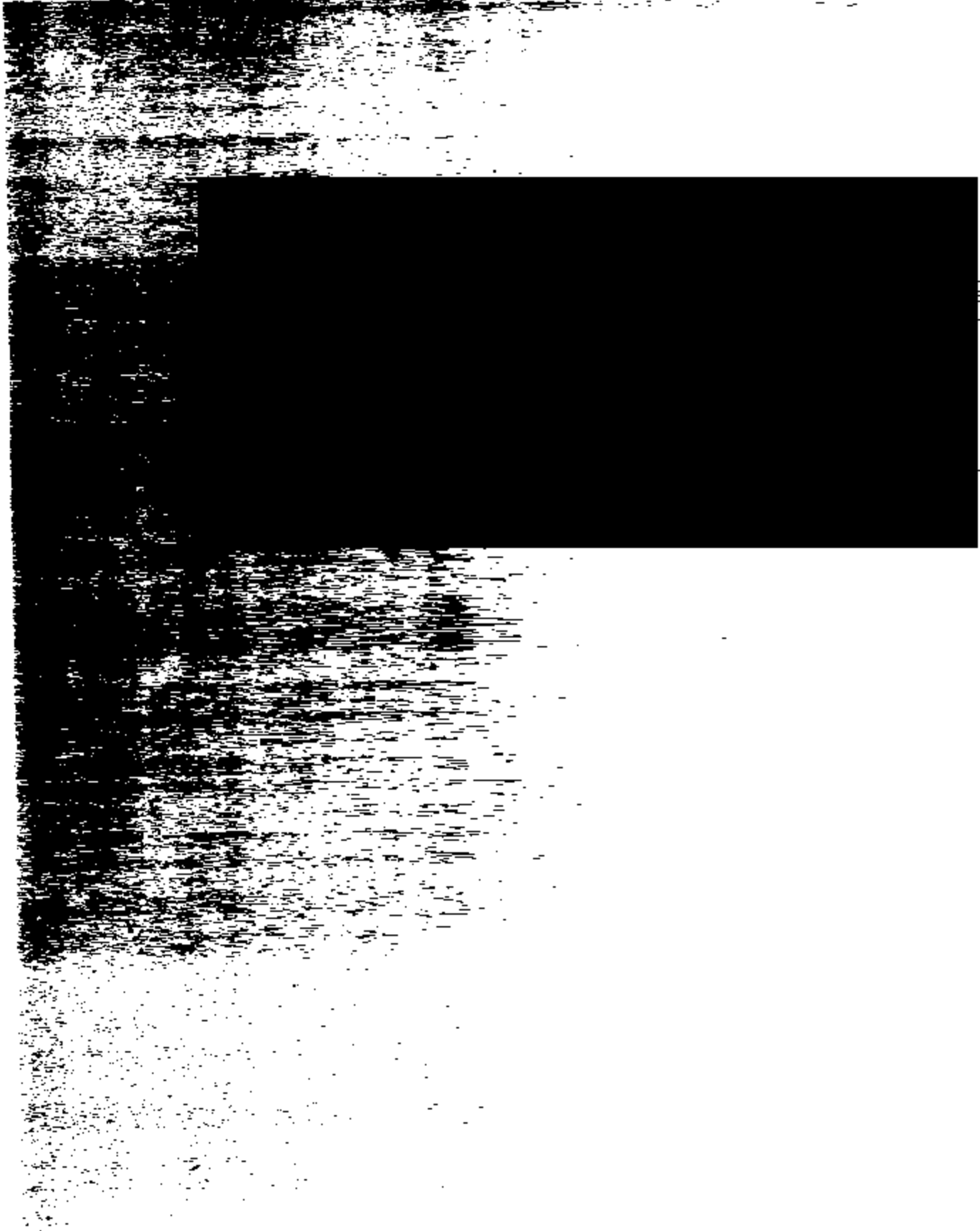
Thank you for your attention to this matter. I look forward to hearing from you.

Sincerely yours,

  
M. Andrew Sway

MAS/sif

cc: Mr. John Olsyn (Claim No. 20039345; w/out enclosures)



PE04-076 C 3216

Higham Farm, MI  
Chicago, IL  
Plantation, FL  
San Francisco, CA

30800 Telegraph Road  
Suite 3858  
Bingham Farms, Michigan 48029

Telephone: (248) 727-7100  
Facsimile: (248) 593-5808

Larry W. Jenkins  
Email: [lwj@gdjlc.com](mailto:lwj@gdjlc.com)  
Direct Dial: (248) 717-7104

March 10, 2004

**Certified Mail/  
Return Receipt Requested**

Ford Motor Company  
Attn: Shawn Norton, Legal Dept.  
Parklane Towers West, Suite 300  
Three Parklane Boulevard  
Dearborn, MI 48126

RECEIVED MAR 12 2004

RE: Our Insured: [REDACTED]  
Claim No: [REDACTED]  
Date of Loss: 05/25/01  
Our File Nos: 9.4545 & 9.4546

As you know from our prior correspondences, this firm represents the interests of Allstate Insurance Company in connection with a May 25, 2001, fire at the residence of the Company's insured [REDACTED]. The Company insured [REDACTED] real and personal property, located at [REDACTED] Smith Creek, Michigan.

As you know, the fire was caused by a 1999 Ford F-150. [REDACTED] of Herndon and Associates investigated the fire for Allstate. A copy of his report is enclosed. Samuel Borrello of Harris Investigations investigated the fire for Northgate Ford. His report is enclosed as well. Lastly, Ray Davis of Ray Davis, Inc., investigated the fire for Ford Motor Company.

All of the fire cause and origin experts agreed that the fire originated in the engine compartment of the vehicle. Further, they all concluded the fire was caused by faulting in the vehicle's battery cable. Even Ford Motor Company's own expert, Ray Davis, concluded the battery cable caused the fire. Notably, this vehicle was less than two years old and was still under warranty.

Please accept this letter as a formal demand for the damages Allstate has incurred as a result of this loss. As you will see from the enclosed damage summary, Allstate's damages total \$126,467.16.

As you know, the Statute of Limitations in this matter is quickly approaching. We must either resolve this matter now or file suit. Please contact the undersigned immediately and advise whether you are willing to settle this case short of litigation. Our client has advised it is willing to compromise its claim in order to avoid formal litigation.

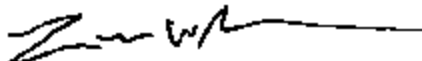
GROTEFELD & DENENBERG, L.L.C.

Ford Motor Company  
March 10, 2004  
Page 2

We look forward to hearing from you soon. Be advised that if we are unable to resolve this matter by April 1, 2004, we will file suit against Ford Motor Company.

Very truly yours,

GROTEFELD & DENENBERG, L.L.C.



Larry W. Jenkins

LWJ/kam  
Enclosures

89083

June 22, 2001

IN RE: Allstate Claim No. [REDACTED]  
H&A File No. 01-10858F  
[REDACTED]

**PREDICATION:**

This report is predicated upon the request of Mr. Dennis McQuade, Allstate Claims Representative, to conduct an investigation into [REDACTED] with special reference to the fire loss of a 1999 Ford, F-150.

**SECRETARY OF STATE:**

Through the Secretary of State, the following information was obtained:

1999 FORD	1FTRK18LXN [REDACTED]	25 PICKUP	CORR
07/02/1999	173K1820092	LGT CONVTL 'F'	86 A

[REDACTED]  
SMITHS CREEK [REDACTED]

RIVERVIEW COMMUNITY FEDERAL CR UNION  
102 S THIRD ST 07/01/1999  
SAINT CLAIR 48074

**REGISTRATION INFORMATION:**

YB1112	CO-RENEWAL
11/25/2001	F-535-441-507-901
MI SOS	

IN RE: Allstate Claim No. [REDACTED]  
H&A File No. 01-1085SF  
[REDACTED]

June 22, 2001  
Page 2.

**INSPECTION:**

On June 1, 2001 at 10:30 a.m., Investigators Walt Hamden and Devin Jordan arrived at [REDACTED] Smiths Creek, to conduct an investigation into the fire loss of a 1999 Ford, F-150.

Once at the scene, a close inspection provided the following information:

SEE ENCLOSED INVESTIGATION REPORT

Prior to leaving the scene, several 35mm color photographs were taken and are enclosed.

**ORIGIN AND CAUSE INVESTIGATION:**

On June 1, 2001 at 10:30 a.m., Investigators Walt Hamden and Devin Jordan arrived at [REDACTED] Smiths Creek, to conduct an origin and cause investigation into the fire loss of a 1999 Ford, F-150, Vehicle Identification Number 1FTRX18LXX[REDACTED]. Upon arriving at the fire location, the Ford Pickup Truck is located within the garage structure, it is parked on the north side of the structure, pointing in an easterly direction.

The examination commences with the rear of the vehicle where all the paint has been consumed, the taillight assemblies have been consumed, and the rubber step bumper has been consumed. The examination further reveals both cast aluminum wheels have been almost totally consumed at the rear of the vehicle and that the plastic fuel tank has vented and drained during the course of the fire. The examination of the fill tube reveals fire damage and the fuel cap has melted.

The examination of the bed of the truck reveals the remains of the spare tire and charred wood from the roof, as well as a partially consumed baseball bat. The fact that there is a substantial amount of spare tire remaining rules out any fire as having originated within the bed of the truck.

Moving forward, all of the window glass has melted and cracked, falling in and out during the course of the fire. The examination further reveals both windows were in the down position at the time of the fire. The examination of the cab area reveals all of the seat and cushion material to have been consumed during the course of the fire. The examination further reveals the remains of papers under the left rear seat. The examination further reveals a substantial amount of papers charred but not consumed attached to the glovebox door, having fallen out during the course of the fire. The examination continues and the front floor areas are fire damaged, the



IN RE: Allstate Claim No. [REDACTED]  
H&A File No. 01-10355E  
[REDACTED]

June 22, 2001  
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areas beneath the seats are fire damaged, and this can be attributed to the fuel tank venting and fuel traveling along the underside of the vehicle, burning upward. The examination further reveals an opening beneath the driver's seat where a rubber type plug was present and has been consumed. The examination of the wiring under the driver's seat reveals no evidence of any electrical faulting, charred wiring insulation is present, ruling out the fire as having originated within this area.

The examination is now focused to the wiring and fuse box on the left or driver's side and there is a substantial amount of combustibles remaining in the area of the fuse box, charred wiring insulation is present, and at this time no evidence of any fire origin could be found.

Upon tracing the wiring harness within the dashboard area, there is evidence of charred wiring insulation, the wiring maintains integrity, and there is no evidence of any electrical faulting. The examination further reveals openings in the bulkhead in the area of the steering shaft and in the center of the bulkhead where the fire extended from the engine compartment into the cab area. At this time, no evidence of any fire origin within the cab area could be found.

The examination is now focused to the engine compartment where there is the remains of the aluminum hood over the cast aluminum plenum. The investigation is now focused to the left or driver's side of the engine compartment where the power distribution center is located and combustibles still remain within this area. Further investigation reveals the remains of cast aluminum for the break fluid reservoir. The examination of the wiring traveling along the bulkhead reveals evidence of charred wiring insulation and at this time no evidence of any fire origin could be found. The examination is now focused to the fuel rail on the left or driver's side, the fuel line connections are present, the reinforced hoses are still connected, and there is no evidence of any fuel leakage. The examination further reveals that the fiberglass valve cover on the left or driver's side is basically intact and there is melting to the cast aluminum cylinder head in the left front. The examination further reveals the power steering hoses have been consumed, the reservoir has been consumed, and this would account for the damage to the cast aluminum cylinder head on the left or driver's side.

The investigation is now focused to the front of the engine where aluminum still remains in the area of the latch, the radiator and air conditioning condenser is heavily fire damaged and has melted down onto the support. The examination further reveals that the alternator is located in the center front of the engine, there is evidence of heat exposure damage to the front of the alternator. The examination of the cable that travels to the alternator reveals it is void of insulation, however, there is no evidence of any electrical faulting. Further, the wiring still maintains integrity.

PE94-078 C 3221

IN RE: Allstate Claim No. [REDACTED]  
H&A File No. 01-100731  
[REDACTED]

June 22, 2001

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The examination is now focused to the left front custom wheel which is fire damaged from the inside out. The tire has been consumed, however, the tire pad under the wheel is still present.

The investigation is now focused to the right front custom wheel where the damage is much more pronounced and the custom wheel has been almost totally consumed and there is a smaller section of the tire pad remaining. The examination of the right or passenger side of the engine compartment reveals extensive fire damage to the fiberglass valve cover. The examination further reveals extensive fire damage to the battery, exposing the plates.

Upon removing the remains of the battery plates, a close examination of the battery cables reveals the positive battery cable is arced in two in the lower section of the engine on the inner right frame. The examination reveals evidence of electrical faulting within this wiring, sufficient to ignite the wiring insulation and immediate combustibles into open flame. The examination of the positive cable that travels over to the power distribution center on the left or driver's side reveals that it is void of insulation, however, no evidence of any electrical faulting could be found.

The examination of the fuel rail on the right or passenger side reveals the nylon fuel lines have been consumed in the right rear. The examination further reveals the cast aluminum plenum is basically intact and at this time no evidence of any fire origin within the upper portion of the engine could be found.

The brake fluid, power steering fluid and radiator are all drained during the course of the fire and the oil and transmission fluids are both full and clean.

The examination is now focused to the routing of the positive battery cable and upon elevating the vehicle into the air, there is evidence of electrical faulting on the positive battery cable that travels to the starter. The ground cable reveals that it is void of insulation, however, no evidence of any fusing or electrical faulting was found.

At this time, after completing the above inspection and examination, it is the opinion of both investigators that the fire was accidental in nature. It is further the opinion of both investigators that the fire originated within the engine compartment on the right or passenger side, in the immediate area of the positive battery cable and at this time the investigation continues.

PE04-078 C 3222

IN RE: Allstate Claim No. [REDACTED]  
H&A File No. 01-10855F  
[REDACTED]

June 22, 2001  
Page 5.

**TITLE INFORMATION:**

A review of the title information indicates a corrected title was issued on July 2, 1999 to [REDACTED] Smiths Creek. Further review of the title information indicates that this was an original purchase at which time the odometer showed 86 actual miles. The first secured interest is listed as Riverview Community Federal Credit Union as of July 1, 1999. The license plate of [REDACTED] was not due to expire until November 25, 2001. The driver's license number listed on the registration was [REDACTED].

**NICB VINASSIST:**

A review of the NICB Vinassist indicates that the 1999 Ford, F-150 4X4, is equipped with a 5.4 liter engine, and was assembled in Norfolk, Virginia.

**NATIONAL HIGHWAY TRAFFIC & SAFETY ADMINISTRATION:**

A search of the National Highway Traffic & Safety Administration, Recall Database, produced four recalls pertaining to 1999 Ford, F-150 Trucks. Upon reviewing same, none were found to pertain to the fire in question.

A further search was conducted of the National Highway Traffic & Safety Administration, Defect Investigations Database, which produced one record pertaining to 1999 Ford, F-150's. Upon reviewing same, it was found not to pertain to the fire in question.

**ALL DATA SYSTEM:**

A search of the All Data System produced three recalls and a number of technical service bulletins pertaining to the vehicle in question. Upon reviewing same, none were found to pertain to the fire in question.

**OWNER INTERVIEW:**

On June 1, 2001, at 10:50 a.m., Investigator Devin Jordan conducted an interview with [REDACTED] who is the titleholder, named insured, and primary driver of the vehicle in question.

IN RE: Allstate Claim No. [REDACTED]  
H&A File No. 01-1085SF  
[REDACTED]

June 22, 2001  
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Further questioning revealed that occasional drivers include his girlfriend and various friends. When questioned regarding any complaints or problems with the vehicle, the insured indicated that the high beams worked intermittently for the last three or four months.

The fire was discovered on May 23, 2001 at 1:00 or 1:30 p.m. and the weather conditions were rainy, cloudy and the wind was out of the east. The location of the fire was [REDACTED]. Subsequently, the insured contacted 911 and the Kimball Township Fire Department responded in 20 to 25 minutes and extinguished a fire involving the 1999 Ford, F-150 4X4. The vehicle in question is equipped with a 5.4 liter V-8 engine, and was purchased new in April of 1999. The selling dealership was Russ Milne Ford in Utica. At the time of the purchase, there was a three year/36 month warranty in effect on the vehicle and an extended warranty was obtained for four years or 100,000 miles.

When questioned regarding any warranty service performed on the vehicle, it was learned that no warranty service had been performed since ownership.

When questioned regarding any service work performed on the vehicle, the insured indicated that he replaced a head lamp fuse with the same size. Further, the dealer replaced one of the coils above the spark plug on February 1<sup>st</sup>. Oil changes have occurred. All of the service was performed at Northgate Ford in Port Huron.

The insured went on to state that when the coil pack problem occurred, the dashboard lights went out, the radio flickered, and the engine quit. Further, it was learned that the engine cranked, restarted and ran rough. When the coil was replaced, all of these problems went away.

At the time of the fire, the fuel tank was full and it was learned that the insured normally checks the fluid levels. The last person to have entered the engine compartment would have been the insured to check the oil at each fuel fill-up.

Oil changes are secured every 3,000 miles and in between oil changes, the insured has to add one quart of oil every 3,000 miles. Further questioning revealed that the insured does not have to add any other fluids.

When questioned regarding any mechanical problems with the vehicle, the insured indicated he has had none. When questioned regarding any electrical problems with the vehicle, the insured reiterated that he had a problem with the high beams. Further questioning revealed that the high beam problem was never repaired due to scheduling problems.

PE04-878 C 3224

IN RE: Allstate Claim No. [REDACTED]  
H&A File No. 01-1085SF  
[REDACTED]

June 22, 2001  
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Mileage at the time of the purchase was new; mileage at the time of the fire loss was 60,000 plus.

When questioned regarding experiencing any problems with animals nesting in the engine compartment and chewing on wiring, the insured indicated he has never had such a problem.

Since ownership of the vehicle, the insured has not received any recall notices, campaigns, or correspondence from the manufacturer.

When questioned regarding whether the insured is a smoker, he indicated he does not smoke and no one was smoking in the vehicle at the time of the discovery of the fire.

When questioned regarding adding any accessories to the vehicle, the insured indicated that he added a CB. The insured stated that he wired it directly to the battery through the door jamb on the passenger side. Although the wiring was still within the vehicle, the CB had been removed three months prior.

When questioned regarding whether the vehicle has an alarm system, the insured indicated that it has a factory remote type alarm system and that it was not set at the time of the fire.

When questioned regarding whether the vehicle had ever been involved in an accident, the insured indicated that it had in May or June of 1999 and Allstate satisfied the claim. The damage was to the rear end and Russ Milne Ford repaired the vehicle. No parts were replaced on the engine.

At the time of the fire, the vehicle had been parked for approximately three hours. Accessories being operated prior to parking the vehicle included the radio. At this time, the insured indicated that the ignition was in the accessory position at the time of the fire as he was listening to the radio within the garage structure. Further questioning revealed that all accessories were not functioning properly, specifically the high beams. When questioned regarding whether the vehicle was ever wired for a trailer, the insured stated that it was factory wired.

Just prior to the fire, the insured did not observe any fluid leaks, had not experienced any operability problems, no warning lights were illuminated or changes in the gauges prior to parking the truck. Further questioning revealed that the insured did not detect any odors or hear any noises prior to the fire. The insured went on to state that the smoke was first observed coming out the left garage door, which was open. The color of the smoke was black and the wind was out of the east. The fire was first observed coming out the left garage door and both the garage and the truck were on fire. The color of the flames were orange. The hood was

PE04-B78 C 3229

IN RE: Allstate Claims No. [REDACTED]  
H&A File No. 01-10858F  
[REDACTED]

June 22, 2001  
Page 5.

closed at the time of the fire and no one opened it prior to the arrival of the fire department. No doors were left open, the doors were unlocked, and the driver and passenger door windows were in the down position.

In a short scenario, the insured stated that the vehicle was parked for approximately three hours within the garage and the ignition was in the accessory position. The insured heard the horn sounding, looked outside and saw smoke coming out the garage. The insured called 911, went outside, and observed flames coming out the garage and vehicle. The insured utilized a garden hose to wet down his house until the fire department responded and extinguished the fire.

No one photographed the vehicle or garage structure at the time of the fire and the firemen indicated, specifically St. Clair Fire Investigator Dan Eastwood, that the fire started within the truck. The insured indicates he has no idea as to the cause of the fire.

As a result of the fire, the garage, two snowmobiles, a three-wheeler, car parts, and the residential structure were all damaged by fire. Further, no other fire investigators have contacted the insured and no items have been removed from the scene.

#### RE-EXAMINATION OF VEHICLE:

On June 11, 2001 at 10:30 a.m., Investigator Devin Jordan returned to the fire location of [REDACTED] in Smiths Creek, Michigan and met with fire loss expert, Ray C. Davis of Ray C. Davis, Inc. While at the fire location, Mr. Davis conducted an origin and cause investigation on the vehicle in question. During his examination, he determined that the fire originated in the right or passenger side of the engine compartment. This source stated that the fire appears to have originated in the main positive cable which travels from the battery to the starter and may have been caused by the wiring insulation becoming compromised, allowing the positive cable to ground on some unknown object, igniting the wiring insulation and causing the subsequent damage. Further conversation with Mr. Davis revealed that he would research if there was any connection to the fire with the fact that the ignition was in the accessory position and not the On position. Further, Mr. Davis stated he would notify Ford Motor Company of his findings that the fire is an electrical fire and originates in the main positive cable which travels from the battery to the starter. At this time, wiring to include the positive battery cable, was placed in a bag, labeled with an evidence tag, and zip-tied to the passenger seat framing and photographed by this investigator.

PE84-878 C 3226

IN RE: Allstate Claim No. [REDACTED]  
H&A File No. 01-10855F  
[REDACTED]


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**CONCLUSION:**

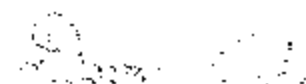
Having completed an examination of the vehicle, interviewed the insured, conducted research pertaining to the vehicle in question, reviewed the fire investigation with Stewart Trepte, who conducted a structural fire investigation, and based upon all of the information known at the time of the preparation of this report, it is the opinion of both investigators that the fire was accidental in nature. It is further the opinion of both investigators that the fire originated within the engine compartment, in a short to ground in the positive battery cable that travels to the starter. There is evidence of electrical faulting, sufficient to ignite the wiring insulation and immediate combustibles into open flame, with the fire extending upward and outward causing the damage present. The fire further extended to the contents within the garage structure, as well as the garage structure and residential structure.

It should be noted that Ford Motor Company retained the services of Ray C. Davis, a fire loss expert who agreed that the fire did in fact originate within the positive battery cable.

At this time, the file remains open pending a decision to have Mike McGuire from E.F.I., examine the faulty wiring.



Walter O. Hamden, Jr.



Devin C. Jordan

WOH/jj

FE04-070 C 3227



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FIRE - EXPLOSION - THEFT - INJURY  
Licensed & Bonded

September 5, 2001

Mr. Anthony Napolitan  
Universal Underwriters Group  
Victor Corporate Center  
19575 Victor Parkway  
Suite 200  
Livonia, Michigan 48152

**IN RE: NORTHGATE FORD; 3608 PINE GROVE AVENUE, PORT HURON  
OUR FILE NO: 01-759FA  
DATE OF LOSS: MAY 25, 2001**

**PREDICATION**

This report is predicated upon the request of Mr. Anthony Napolitan, Claims Representative, Universal Underwriters Group, to conduct an investigation into the fire loss of a 1999 Ford F-150 pickup truck.

**MICHIGAN SECRETARY OF STATE**

In a check with the Michigan Secretary of State it was ascertained that vehicle identification number 1FTRX18L8X1 [REDACTED] is titled to Joseph Leonard Fontaine. This record further indicates that the vehicle is a 1999 Ford, F-150 pickup truck, with a corrected title issued July 2, 1999. The actual mileage listed at the time of this transaction was 86. It was further ascertained that Riverview Community Federal Credit Union holds a secured interest in the vehicle.

**ORIGIN AND CAUSE**

On August 1, 2001, Investigator Borrello responded to Pro-Tech Auto Auction located in Flint, Michigan to conduct an examination of the claimant's 1999 Ford, F-150 pickup truck. Once at this location said vehicle was found within an outdoor, secured storage lot and was identified by the tow records. Also present at the time of the examination was Devon Jordan, Fire Investigator, Herndon and Associates.

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516 BIDDLE - WYANDOTTE, MICHIGAN 48192  
(734) 282-7810 - FAX (734) 282-1216

FE84-878 C 3228



**IN RE: NORTHGATE FORD; 3600 PINE GROVE AVENUE, PORT HURON  
OUR FILE NO: 01-759FA  
DATE OF LOSS: MAY 25, 2001**

**September 5, 2001.**

Upon initial approach of the vehicle, intense fire damage was observed to the vehicle. Burn patterns to the outside of the vehicle placed the hottest portion of the fire to the front clip/engine compartment. This investigator observed that the aluminum hood was consumed by the fire, as well as the grille work, air conditioning condenser and radiator. All of the belts and hoses were consumed by the fire, as well as intense burning within the area of the engine compartment.

Continuing the examination of the vehicle, this investigator observed that all of the tires were consumed, and the alloy wheels were consumed to different degrees. The greatest consumption was to the left rear and right front alloy wheel. In the area of the left rear alloy wheel this investigator observed evidence of the location of the fuel tank which purged fuel during the course of the fire. The right front alloy wheel was heavily melted and damaged and also corresponded to oxidation and burn patterns observed at the right fender and inner fender well.

An examination of the interior compartment revealed evidence of secondary fire damage. This investigator observed burning in the area of the instrument panel that is indicative of the fire originating within the engine compartment and extending into this area. Other evidence of burning to the interior compartment is attributed to the cab-over design of the vehicle.

The floor areas were examined for any evidence of irregular burn patterns and none was found. This investigator further observed evidence of personal effects within the interior compartment, to include personal papers in the glove box.

The interior compartment electrical system was examined for any evidence of an electrical malfunction within this area that could account for the engine compartment fire and none was found.

The interior compartment was examined for any evidence of the careless use of smoking material being the cause of the fire, and this was found not to be the case.

This investigator observed that the spare tire was within the rear pickup box at the time of the fire. Debris from a structure was observed in the rear pickup box and is secondary to the fire originating within the vehicle.

Said vehicle is equipped with a Draw-Tight hitch and plug connector. This investigator did not observe any evidence of the fire originating within this area or a malfunction.

**IN RE: NORTHGATE FORD; 3600 PINE GROVE AVENUE, PORT HURON  
OUR FILE NO: 01-759FA  
DATE OF LOSS: MAY 25, 2001**

**September 5, 2001.**

With the assistance of the salvage facility said vehicle was raised into the air and an examination of the undercarriage was performed. This investigator observed that the exhaust system and catalytic converter were free from any evidence of overheating or this being the source of ignition. During the course of the undercarriage examination, secondary fire damage was observed in the area of the fuel tank and fuel lines. No evidence of a preexisting leak of the fuel system was observed.

This investigator observed that the starter for the vehicle is located at the right lower engine block area adjacent to the transmission bell housing. An examination of the starter revealed that the cable is properly attached to same. The eyelet was observed as being properly fastened, with no evidence of free play.

Continuing the examination of the starter, burning was observed in this area, to include the consumption of all of the insulation and protective conduit. In tracing the cable from the starter it was observed that it travels upward and to the right through a loop bracket for support. This investigator observed that the wire is arced in the approximate area of the top of the bracket. An examination of the bracket also revealed areas of discoloration and oxidation in the area of the arc, as opposed to the balance of the bracket. The examination then focused on the engine compartment.

An examination of the engine compartment revealed that the vehicle is equipped with a sequential port fuel-injection system. It was also observed that the vehicle is equipped with individual coil over packs at each spark plug. An examination of the spark plug areas revealed secondary fire damage to the spark plug boots and wiring. No evidence of negligent workmanship was observed in this area.

Continuing the examination of the engine compartment, more specifically the fuel system, secondary fire damage is observed to the flexible fuel connections. The attaching points to the fuel rail were observed as being intact, with no evidence of a preexisting leak. A backfire condition was further eliminated as the cause of the fire.

The engine compartment was examined for any evidence of a preexisting combustible liquid leak and none was found. Both the engine oil and transmission fluid were observed within the safe range. The balance of the fluids within the engine compartment were drained by the fire due to their reservoirs being consumed.

**IN RE: NORTHGATE FORD; 3600 PINE GROVE AVENUE, PORT HURON  
OUR FILE NO: 01-759FA  
DATE OF LOSS: MAY 25, 2001**

**September 5, 2001.**

Focusing in the area of the deepest and most intense burning, this investigator observed that it is the right engine compartment area. Within this area this investigator observed the remains of the electric circuitry, to include the solenoid and battery.

As an overall examination of the electric circuitry within the engine compartment was performed, the deepest and most intense burning emanates from the wiring at the right side of the engine compartment. The alternator was examined for any evidence of a malfunction that could account for the fire damage present and none was found. The cable leading to the area of the power distribution box from the alternator suffered secondary fire damage in that all of the insulation was consumed by the fire. This investigator observed that the negative battery cable was void of plastic insulation and failed to reveal any evidence of beading, fusing or arcing. The positive battery cable was found within a nylon evidence bag, and it was ascertained through Devon Jordan that it was placed in same at the time of the original origin and cause investigation. The nylon container was opened and the wiring was examined. Areas of arcing and fusing were observed to the positive battery cable. It should be noted that this cable does not offer any circuit protection between the battery and starter.

After completing the above inspection and examination, it is the opinion of this investigator that the fire was accidental in nature and originated within an electrical malfunction in the area of the engine compartment. It should be noted that this investigator eliminated any negligent workmanship in the area of Northgate Ford as being the cause of the fire.

#### **NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION**

In a check with the National Highway Traffic Safety Administration, it was ascertained that four recalls are in effect for said vehicle. Review of recall campaign number 98S21 indicates an O-ring may have been damaged when the fuel pressure regulator was installed. If the O-ring is damaged, fuel vapors or leakage could occur. If an ignition source is present, a fire could result. (See enclosed recall notice)

It should be noted that after completing the origin and cause investigation, this investigator was able to eliminate this recall as being a contributing factor to this loss.

#### **COMPARISON VEHICLE**

On August 27, 2001, Investigator Borrello located a comparison vehicle. An examination of the vehicle revealed that the positive battery cable travels from the engine compartment battery

IN RE: NORTHGATE FORD; 3600 PINE GROVE AVENUE, PORT HURON  
OUR FILE NO: 01-759FA  
DATE OF LOSS: MAY 25, 2001

September 5, 2001.

location, in the area of the right fenderwell, through a loop to the started. The loop bracket was observed as being rubber coated and the battery cable is wrapped in a protective sheathing. This investigator further observed that the negative battery cable attached to the frame in the area of the bracket.

Further examination of the comparison vehicle revealed that the coil over plug assemblies are located in the area of the intake manifold. This investigator observed that each spark plug has its own separate coil pack, and the number four coil pack is located at the left rear of the engine compartment, away from the area of origin.

### SUMMARY

After completing an examination of the vehicle, reviewing the repair orders, reviewing recall information, as well as examining a comparison vehicle, and discussing pertinent information with the Claims Representative, it is the opinion of this investigator that the fire was accidental in nature. It is this investigator's further opinion that the fire originated within an electrical malfunction in the area of the wiring, more specifically, the battery cables at the right rear lower engine compartment area.

It should be noted that this investigator was able to eliminate any negligent workmanship performed by Northgate Ford. The replacement of the coil over plug would not necessitate the removal or disturbing of the positive battery cable. It should be further noted that the work performed by Northgate Ford was not within any close proximity to the area of origin.

The results of this investigation have been discussed with the Claims Representative and no further investigation is being requested at this time.

This report is being forwarded for your review. Should the Claims Representative have any questions regarding this report, feel free to contact the undersigned.



Submitted by \_\_\_\_\_

Samuel F. Borrello

SFB/kd

VEHICLE FIRE INVESTIGATION

1

File Number: 01-759FA

Fire Department: N/A

Date and Time of Investigation: AUGUST 1, 2001 1:00 P.M.

Fire Report # N/A

Vehicle Examined at: PRO-TECH FLINT

Location at time of fire: [REDACTED] SMITH CREEK MI

RESIDENTIAL

Date of fire: MAY 25, 2001 FRIDAY

Time of call:

Description of vehicle: 1999 FORD F-150

Color: UNKNOWN

Owner:

[REDACTED] SMITHS CREEK MI [REDACTED]

License Plates: N/P State: Expires:

Vehicle Identification Number: 1FTEK1SL8XN [REDACTED]

Lien Holder: RIVERVIEW COMMUNITY FEDERAL CREDIT UNION

Insurance Company: N/A

PASSENGER COMPARTMENT (INTERIOR):

Dashboard: CONSUMED  
Radio: INTACT  
Speakers: INTACT  
Fire Wall: DESTROYED  
Ignition: DESTROYED  
Position:  
Steering Column: DESTROYED  
Air Bags: CONSUMED  
Front Seat: CONSUMED  
Rear Seat: CONSUMED  
Glove Box: CONSUMED  
Personal Affects: YES  
Ignition Key: NONE FOUND  
Odometer Reading: DESTROYED  
Title History: CORRECTED JULY 2, 1999  
Personal Affects In Passenger Compartment: PAPERS  
Other Items: NO

ENGINE COMPARTMENT:

Engine Accessibility: OPEN Belts: CONSUMED  
Engine: BURNED & INTACT  
Battery: MELTED Hoses (U & L) CONSUMED  
Radiator: DRAINED BY FIRE  
Oil Level: SAFE  
Radiator Level: DRAINED BY FIRE  
Transmission: SAFE  
Engine Parts Missing: NO  
Burglar Alarm System: UNKNOWN

VEHICLE FIRE INVESTIGATION

2

EXTERIOR EXAMINATION:

Tire Type: CONSUMED

<u>Tires</u>	<u>Wheel Cover</u>	<u>Tread Wear</u>	<u>Missing</u>	<u># of Lugs</u>
LF	ALLOY	N/A		ALL
RF	ALLOY	N/A		ALL
LR	ALLOY	N/A		ALL
RR	ALLOY	N/A		ALL

DOOR CYLINDERS (LOCKS):

Left Front Door: MELTED  
Right Front Door: MELTED

GLASS CONDITION:

Windshield: MELTED  
Rear Window: MELTED  
Driver's Window: MELTED  
Position: UP  
Passenger Window: MELTED  
Position: UP  
Left Rear Window: MELTED  
Position: UP  
Right Rear Window: MELTED  
Position: UP  
Sunroof: N/A  
Convertible Top: N/A  
Electric Windows: YES

TRUNK COMPARTMENT EXAMINATION: PICKUP

Trunk:  
If Forced, By Whom:  
Trunk Lock:  
Trunk Release Button:

TRUNK CONTENTS:

Spare Tire: INTACT  
Tread:  
Tire Changing Equipment: INTACT  
Other Contents/Personal Affects: NO

VEHICLE FIRE INVESTIGATION

3

UNDER VEHICLE:

Fuel Tank:	DAMAGED
Gas Cap:	MELTED
Fill Pipe:	DAMAGED
Oil Pan:	INTACT
Leakage Noticed:	NO
Transmission Pan:	INTACT
Leakage Noticed:	NO
Evidence Confiscated:	NO

BODY CONDITION:

Front Bumper:	
Hood:	
Grill:	
Left Fender:	
Driver's Door:	CLOSED
Rear Driver's Door:	
Left Quarter Panel:	
Trunk Lid:	
Rear Bumper:	
Roof:	
Right Quarter Panel:	
Passenger Door:	CLOSED
Rear Passenger Door:	
Right Fender:	
Rear Cargo Doors:	
Side Cargo Doors:	
OVERALL BODY CONDITION:	AVERAGE

Photographs Taken: 36

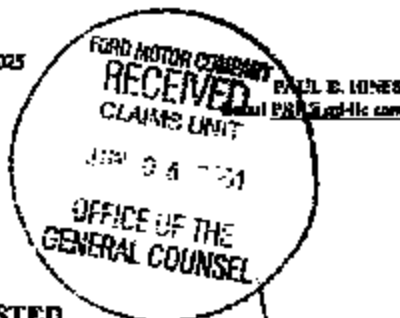
Investigated By: SAMUEL F. BORRELLO

FE84-678 C 3235

**GROTEFELD  
& DENENBERG, LLC**

Bingham Farms, MI  
Chicago, IL  
Plantation, FL  
San Francisco, CA

30900 Telegraph Road  
Suite 3858  
Bingham Farms, Michigan 48025  
Telephone: (248) 727-7100  
Facsimile: (248) 593-5808



June 5, 2001

**BY CERTIFIED MAIL - RETURN RECEIPT REQUESTED  
AND FACSIMILE (313-248-7727)**

Ford Motor Company  
Parklane Towers West, Suite 300  
Three Parklane Boulevard  
Dearborn, MI 48126  
Attn: Shawn Norton, Legal Dept.

RE: Our Insured: [REDACTED]  
Claim No.: [REDACTED]  
Date of Loss: 05/25/01  
Our File No.: To be determined

Dear Sirs/Madames:

Please be advised the undersigned represents the interests of Allstate Insurance Company in connection with an May 25, 2001, fire at the residence of the Company's insured [REDACTED]. The Company insured [REDACTED] real and personal property located at [REDACTED] Smith Creek, Michigan. As a result of the fire, the Company is expected to pay over \$100,000.00.

Allstate's investigation into the cause and origin of the fire is continuing. However, please accept this letter as formal notice of a potential claim against you relating to the damages that resulted from the fire. Allstate's investigation to date reveals that you manufactured a Ford F-150 pickup which is believed to have caused the fire.

We suggest you immediately forward a copy of this letter to your liability insurance carrier. Furthermore, please be advised that Allstate must clear the fire scene and begin reconstruction of the facilities so that [REDACTED] will have a place in which to live. You and your insurer and its representatives are invited to inspect and photograph the fire scene and, as appropriate, designate artifacts it would like retained. However, our investigator must be present at the scene at that time.

If you (or your insurer) wish to inspect the fire scene, please contact my paralegal, Larry Jenkins at (248) 727-7104, before 5:00 p.m. on Friday, June 15, 2001 in order to schedule an inspection. If we do not hear from someone on your behalf prior to Friday, June 15, 2001, we will assume you and your insurance carrier do not wish to inspect the fire scene.



**GROTEFELD & DENENBERG, L.L.C.**

If you have any questions or concerns, please contact us.

Very truly yours,

**GROTEFELD & DENENBERG, L.L.C.**



Paul B. Hines

PBH/twj

PE04-078 C 2237



**UNIVERSAL UNDERWRITERS GROUP**  
Victor Corporate Center, 19575 Victor Parkway, Suite 200 • Livonia, Michigan 48152

January 30, 2002

Ford Motor Company  
Office of General Counsel  
Attention: Shawn Norton  
Parklane Tower West, Suite 300  
3 Parklane Blvd.  
Dearborn, MI 48126

P

RE: Our Claim Number: [REDACTED]  
Our Insured: Northgate Ford, Inc.  
Date of Loss: May 25, 2001  
Claimant: [REDACTED]

44-3607 el

Dear Mr. Norton:

Reference is made to the above captioned claim that Universal Underwriters Group is handling pertaining to damages sustained to [REDACTED] 1999 Ford F-150 truck and residential home.

It is our understanding that Ford Motor Company retained Ray C. Davis to conduct an origin and cause investigation on the vehicle. With respect to the information we have in our file Mr. Davis concluded that the fire originated within the positive battery cable. I would very much like to review that report and make same a part of our file in this office.

We have had the vehicle in question inspected by our experts, and their conclusion was that the fire originated within an electrical malfunction in the area of the wiring, more specifically, the battery cables at the right rear lower engine compartment area.

Thank you for your assistance. Please forward a copy of the requested report at your earliest opportunity. Please feel welcome to contact this office if you have any questions.

Sincerely,

*Paula Bohn*

Paula Bohn  
Liability Specialist

PH4-878 C 3236



PE04-078 C 3238



ERIE INSURANCE GROUP

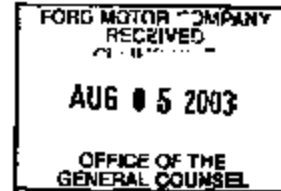
Branch Office - 4801 Louise Dr. - Rossmore Business Center - P.O. Box 2313 - Mechanicsburg, PA 17055-0710  
(717) 795-8200 - Toll Free 1-800-382-1304 - Fax (717) 795-2315 - www.erieinsurance.com

KERRY J. RITCHEY, CPCU, AIC  
Claims Manager

July 30, 2003

Certified Mail

Ford Customer Relationship Center  
P O Box 6248  
Dearborn, MI 48126



RE:

Erie Claim Number: [Redacted]  
Erie Insured: [Redacted]  
Damaged: 1999 Expedition  
VIN: 1FMRU1883XU [Redacted]  
Loss Date: 7/23/03

Dear Sir/Madame,

Kindly accept this letter as our initial subrogation notice regarding the above referenced matter. Our investigation reveals that your company may be responsible for the damages to our insured's vehicle. Our preliminary investigation shows this fire was caused by an oil leak from the vehicle engine. Our expert will be inspecting the vehicle and sending us report shortly. We are settling the total loss with our insured. We are currently holding the salvage in a secure location, for your viewing. Please contact us to make the necessary arrangements, within the next 60 days.

Please have the appropriate representative of your company contact me at the listed address and phone number to make arrangements for inspecting the salvage in York Haven, PA. Thank you for your consideration and cooperation in this matter.

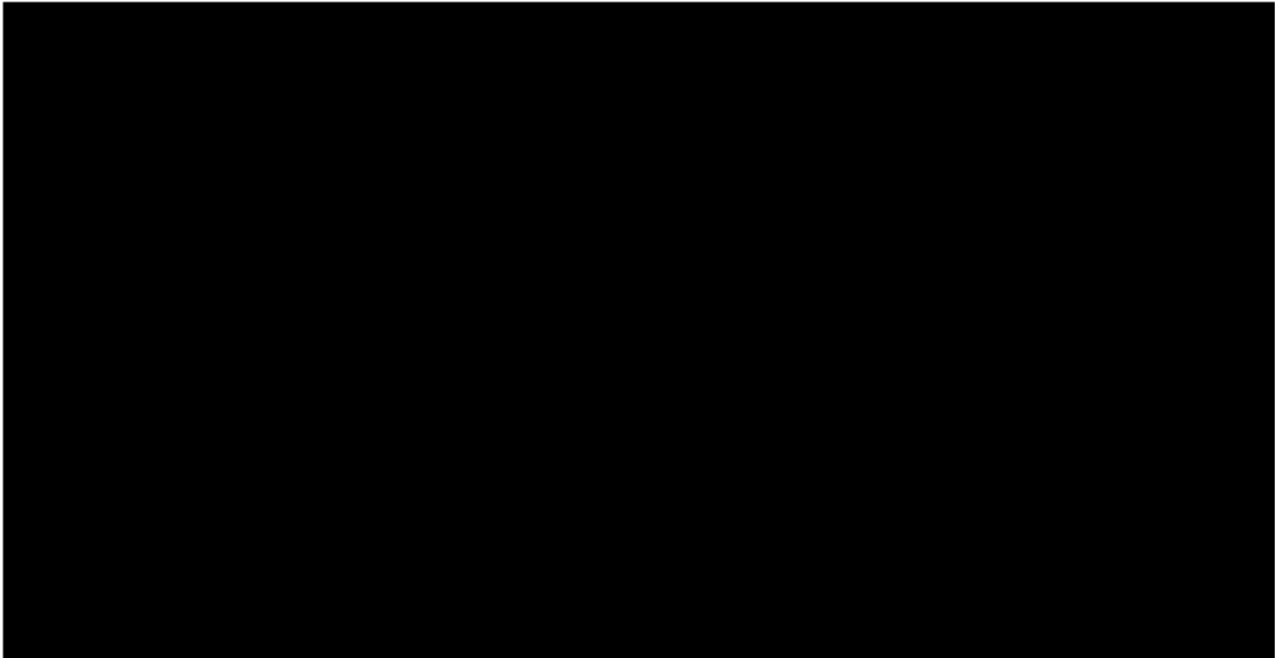
Very truly yours

Francis Guillemette  
Subrogation Specialist II  
1-800-382-1304 x207

3 AUG -1 P  
CONSUMER AFF

cc: [Redacted] Columbia, PA [Redacted]  
cc: AA7536 JONATHAN HARRIS GRONINGER  
cc: File

- 7/23/03  
- 1999 Expedition  
- VIN



of the

**HANNAH, COLVIN & PIPES, L.L.P.**

ATTORNEYS AT LAW  
2051 SILVERCREST DRIVE, SUITE 200  
BATON ROUGE, LOUISIANA 70808  
TELEPHONE (225) 766-5546  
FACSIMILE (225) 766-5546

*New  
(For Shawn)*

*30 2004*

MICHAEL S. COLVIN  
W. RANSOM PIPES  
JANICE M. REVERE  
KIRSTINA L. HARPER  
JUDSON O. BONES  
DORIS M. ARADIE  
\*Also admitted in TX

HANK S. HANNAH  
(1981 - 1991)

June 29, 2004

Via Fax: (313) 843-4889 and  
Certified Mail Return Receipt Requested



*- '20 Exped  
Baton Rouge, LA  
- 6/27/04*

Ms. Shawn L. Norton  
Ford Motor Company  
Parklane Tower West, Suite 300  
Three Parklane Boulevard  
Dearborn, Michigan 48126-2568

Re: State Farm Claim #: [REDACTED]  
Insured: [REDACTED]  
Location: [REDACTED]  
Baton Rouge, L.  
Date of Loss: June 27, 2004  
Our File No.: 821-2142

Dear Ms. Norton:

Please be advised that I have been retained by State Farm Fire & Casualty Company in connection with damages sustained as a result of a fire which occurred on June 27, 2004, at the residence of its insured [REDACTED] in Baton Rouge, Louisiana. According to State Farm's investigation, the fire originated in a 2000 Ford Expedition Sport WG, that was parked under the carport of the above mentioned residential dwelling. As a result of the fire, the residential dwelling and the vehicle sustained substantial property damage.

The remains of the vehicle have not yet been removed from the fire scene, which is located at the above-referenced address. However, I do expect that the vehicle will be removed from the fire scene by the early part of next week, and safe-guarded at a storage facility. If you wish to schedule an inspection of either the fire scene or the vehicle, please call me upon your immediate receipt of this correspondence, so that we may make the necessary arrangements.

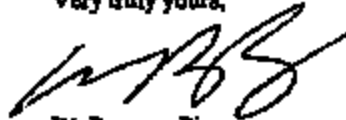
By way of this correspondence, State Farm Fire & Casualty Company is placing Ford Motor Company on immediate notice of this claim as they are seeking full reimbursement of payments made or to be made to or on behalf of its insured [REDACTED]

PEMA-8718 C 5242

Ms. Shawn L. Norton  
June 29, 2004  
Page 2

If you have any questions or wish to discuss this matter further, please call.

Very truly yours,



W. Ransom Pipes

WRP/th

cc: Mr. Ralph Newell (via facsimile: 770/297-9133)

██████████ Claim No. ██████████  
Ms. Kathy Cress

10/1

PEBA-070 C 3243