PE04-078
FORD
1/28/2005
ATTACHMENT F
BOOK 8 OF 12
PART 5 OF 6

State Farm Insurance Companies



FORD MOTOR COMPANY RECEIVED CLARKS LIMIT

APR 3 6 2004

OFFICE OF THE GENERAL COUNSE

PO Box 96/89 Winter Haven, FL 33883-9809

March 18, 2004

Ford Motor Company Parklane Towers West 3 Parklane Blvd Dearborn, MI 48128

RR: Claim Number: Date of Loss:

Our Insured:

Total Amount of Loss:

Our Payment: Insured's Paywent: \$16,250.80 \$15,750.80 \$500.00

Your File Number:

Your Insured:

Ford Motor Co. Parklane Towers West

3 Parklane Blvd Ste 400

Dearborn, MI 48128

October 6, 2003

SUBROGATION CLAIM

We have been informed that you are the insurance carrier for the party designated as your insured in the caption of this letter.

Our investigation establishes that your insured was responsible for the damage to our policyholder's property as a result of the accident on the date indicated.

The extensive demage resulted in declaring the vehicle a total loss. Our evaluation of the damages are as follows:

\$ 15275.00 Base Price: \$ 941.50 Tax: 34.35 License Fees: Actual Cash Value: 16250.85 Deductible: \$ 500.00 T/L Settlement Amt: \$ 15750.85 Salvage: \$ PENDING Final T/L Amount: \$ 16250.00

Total Rental/Loss of Use: <u>\$ 0</u>

Total Amount of Logs: \$ 16250.00

HOME OFFICES: BLOOMINGTON, ILLINOIS 61710-0001

PES4-878 C 3342

Parklane Towers West Page 2 March 18, 2004

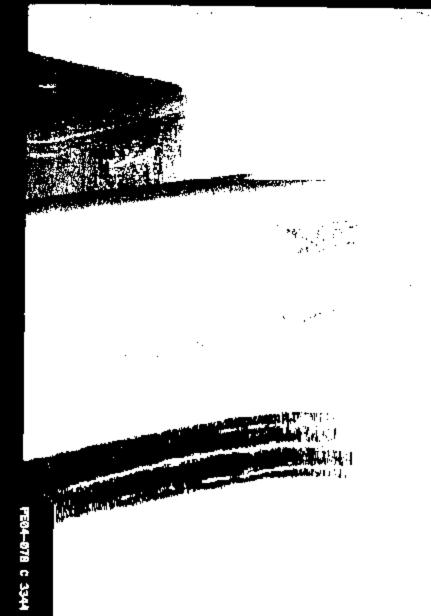
Please accept this letter as a notice of our subrogation rights and communicate with us in regard to your position on the matter.

Sincerely,

Team 34 Fl Central Subrogation (800) 627-4028

State Farm Mutual Automobile Insurance Company

6359



10/8/03

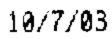




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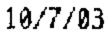
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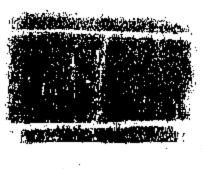
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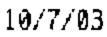
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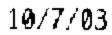
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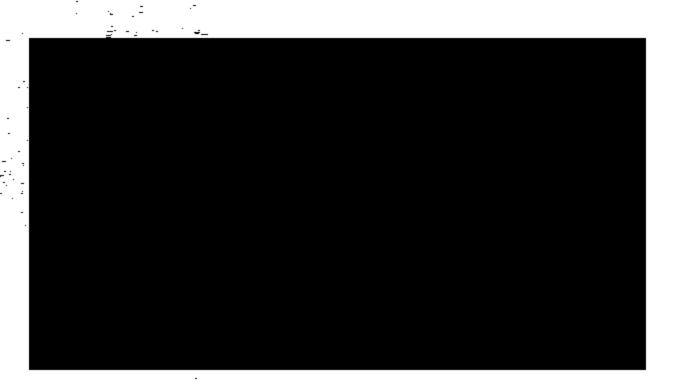








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State Farm Insurance Companies



P.O. Goz. 9613 Winter Heyen, Pt. 33693-9613 (900) 301-7350

March 4, 2004

10.00

Ford Motor Co. Parklane Towers West Ste 400 3 Parklane Blvd. Dearborn, MI 48126-2568 FORD MOTOR COMPANY
RECEIVED
TO THE THEY

MAR 1 0 2004

GENERAL COUNTER

RE: Claim Number

Date of Loss :
Our Insured :

Your Reference:

January 15, 2004

2000 Ford Expedition VIN 1PMEU17L5YL

Dear Sir or Madam:

The identified 2000 Ford Expedition is insured by State Farm Mutual Automobile Insurance Company. The 2000 Ford Expedition experienced a fire failure.

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

Please contact me at the number below to set up a time for your inspection.

Sincerely,

Jessica Capin X4574 Claim Representative

(800) 301-7350

State Parm Mutual Automobile Insurance Company

~ 1/15/04 ~ 1/15/04 ~ 1/15/04

State Farm Insurance Companies®



Florids Regional Office Fire Controllinet Subrogation P.O. Box 9606 Winter Haven, FL. 33683-9606

June 28, 2004

.

ATTN SHAWN L NORTON FORD MOTOR COMPANY PARKLANE TOWERS WEST STE 300 THREE PARKLANE BLVD DEARBORN ME 48128-2588

RECEIPTON AL-2 2004

RE:

insureds:

Date of Loss:

Our Claim Numbers:



Dear Ms. Norton:

This letter is in response to your correspondence to Thomas Warner of April 16, 2004. Please be advised that I will now be handling this claim to conclusion so please direct any future correspondence to me at the P.O. Box listed above.

Our insureds sustained demage to their home (59-C906-204), as well as their 2000 Ford Expedition (59-Y628-519) and a 1999 Harley Davidson motorcycle (59-Y638-005), as a result of this fire.

Below are answers to the questions in your April 16, 2004 letter.

- No statement has been taken to date.
- 2. Fire department report attached.
- Photographs attached.
- Photographs attached.
- We are awaiting our finalized expert's report. However, they have opined the fire originated in the engine compartment of the Ford Expectition.

Lowb /

3

ş

FORD MOTOR COMPANY 59-C906-204 Page 2 June 28, 2004

7. Demages are as follows:

59-C908-204 - Homeowner claim

Suiking damage \$ 73,443.01
Contents damage 78,759.73
Additional fiving expense 11,518.80
Insured's deductible 500.00
Total amount \$164,221.54

59-Y638-005 - 1999 Harley Davidson motorcycle

Motorcycle damages \$3,065.08
Deductible __250.00
Total amount \$3,815.08

59-Y628-519 - 2000 Ford Expedition

 Vehicle damages
 \$21,342.35

 Rental
 200.00

 Deductible
 500.00

 Total ernount
 \$22,042.35

Total of all three claims \$188,478.97

- Copies of maintenance records attached.
- 9. Tampa, Florida.
- 10. VIN: 1FMEU17L5Y
- 11. Approximately 55,000 miles.
- 12. Awaiting fire expert report.
- 13. Vehicle totaled.
- 14. CoPart 12020 US Highway 301 S Riverview, PL 33589 (813) 671-5550 (phone) (813) 671-5452 (fax)
- 15. None to our knowledge.
- 18. No.

FORD MOTOR COMPANY 59-C906-204 Page 3 June 28, 2004

- 17. No.
- 18. Purchased new by our insured at Walker Ford in Clearwater.

The vehicle is currently located and stored at Copart in Riverview, Florida. If your company would like to inspect the vehicle, please contact me, and we can make arrangements for the inspection with our expert at Copart.

Enclosed, please find copies of our supporting documentation as requested. Please advise your company's position on this matter at your earliest convenience.

If you need any further information or wish to discuss this matter, please feet free to contact me at the toil free number listed below.

Thank you for your cooperation and assistance. We took forward to hearing from you seen.

Sincerely.

Karen Dennis

Claim Representative (688) 756-4449, Ext. 3290

STATE FARM FLORIDA INSURANCE COMPANY

KD/049/0628001.160

Enclosures









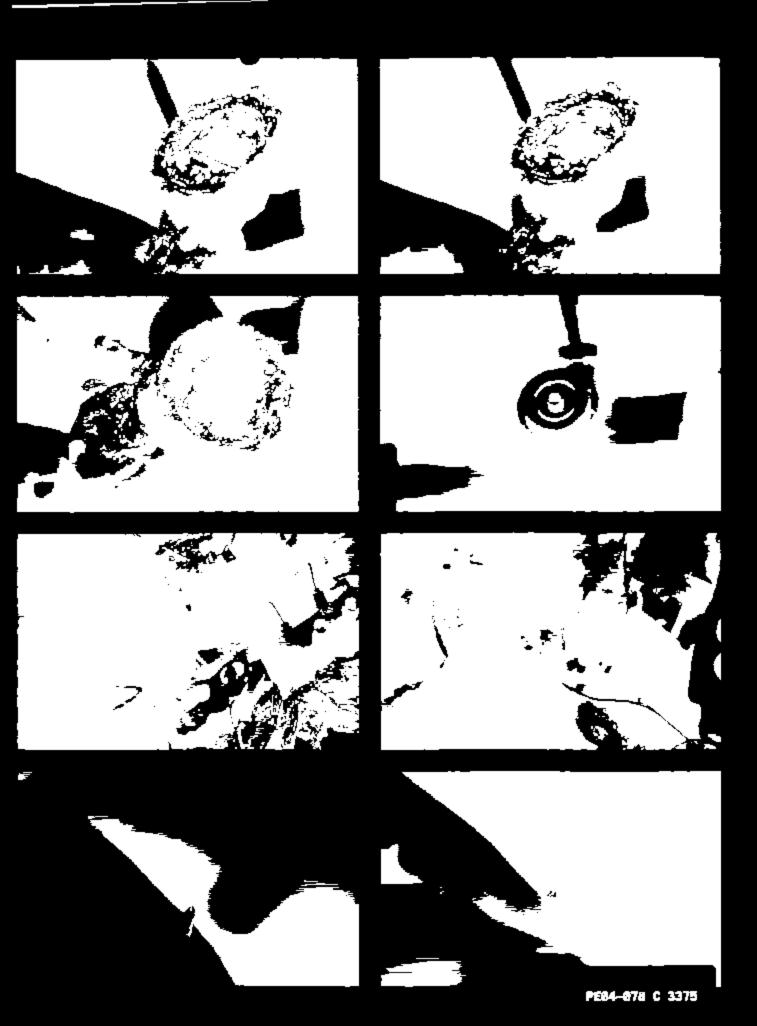








PE84-078 C 3374



















PER4-078 C 3378









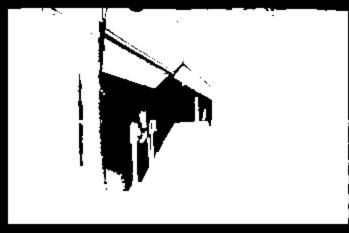






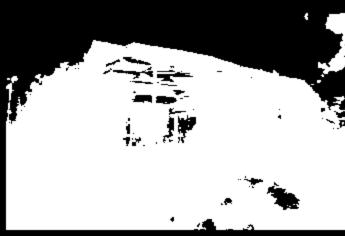


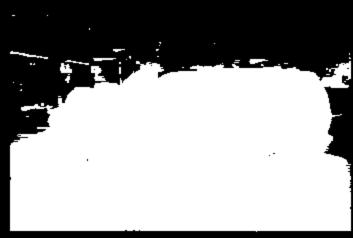














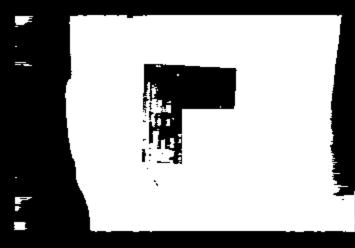




























F84-978 C 338€

















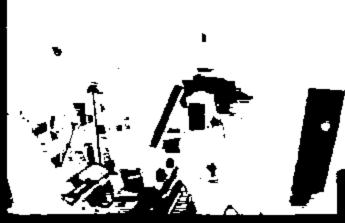


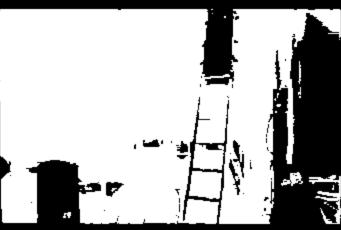






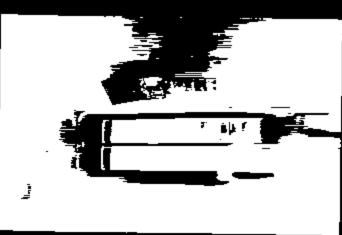






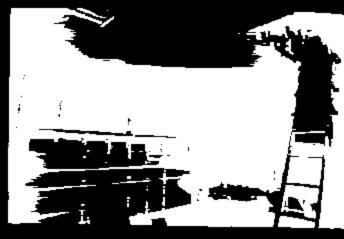




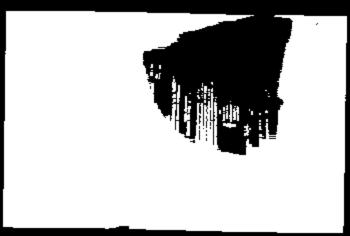


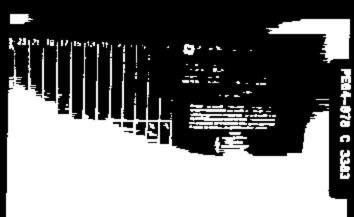


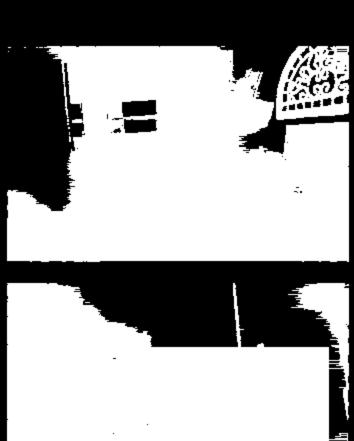




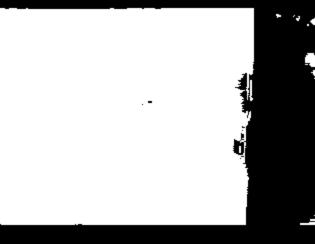








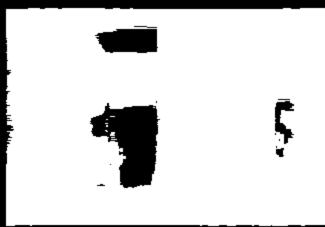














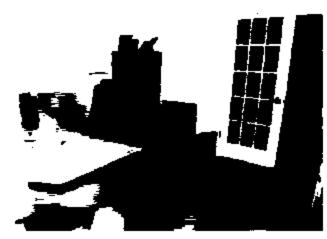
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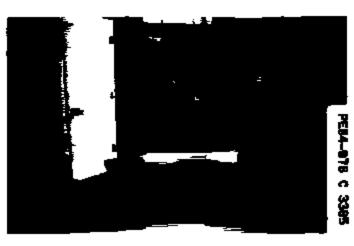
























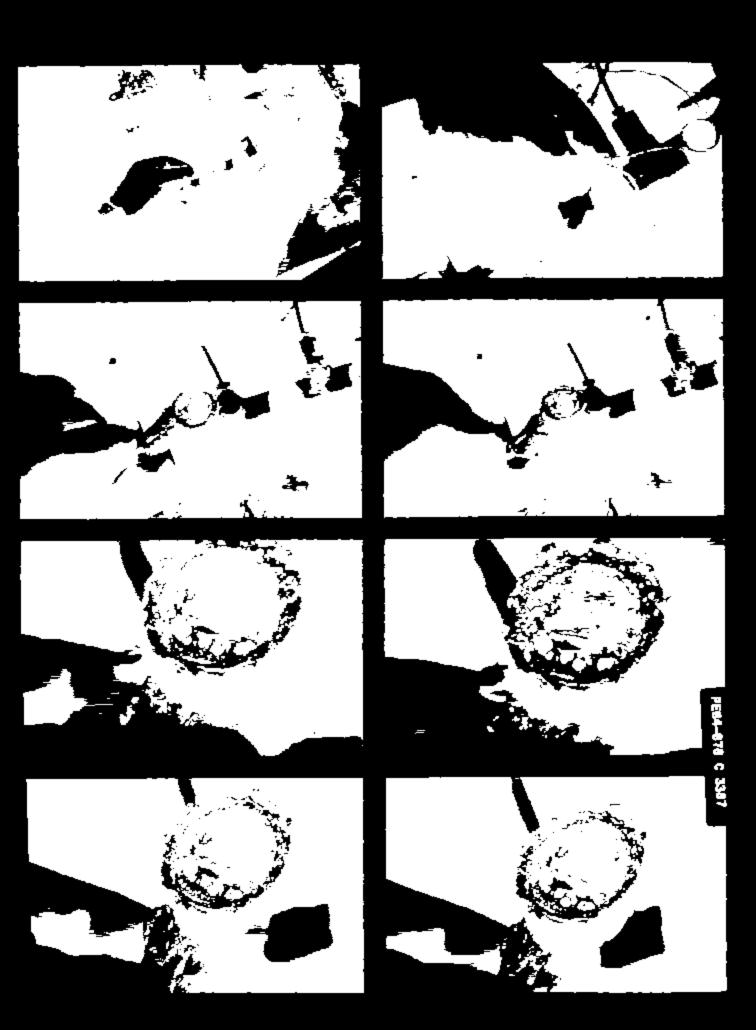


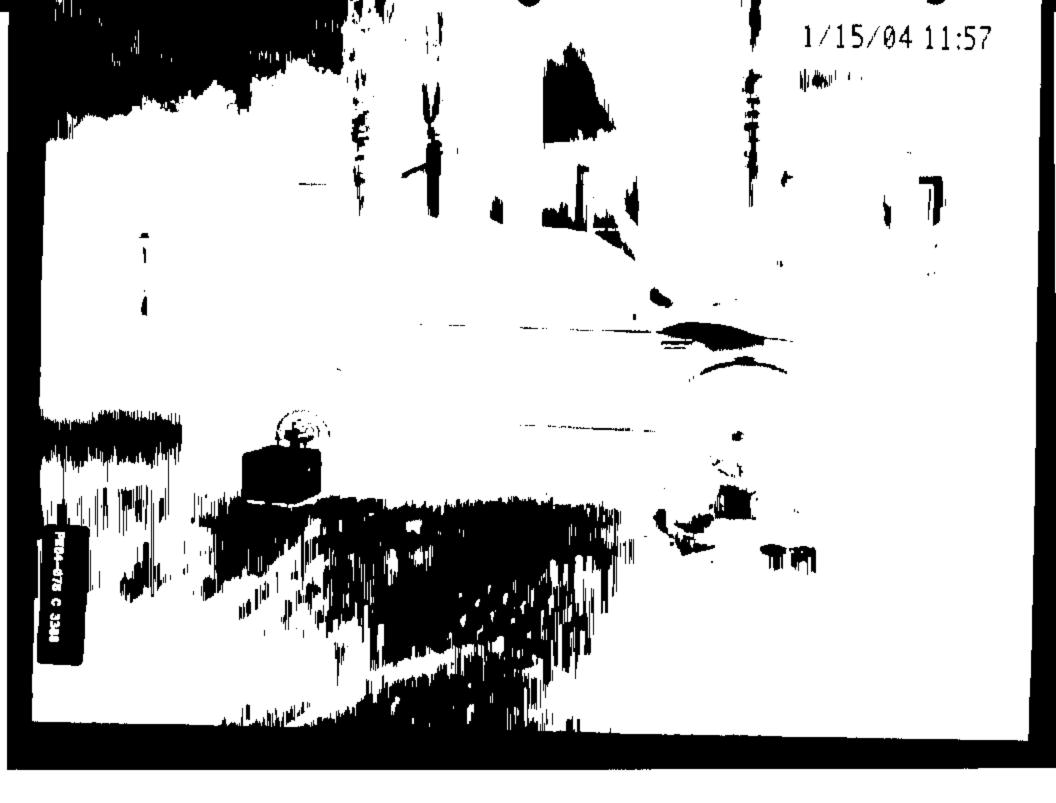


PEB4-878 C 3346













FIRE DEPARTMENT REPORT

incident Report 2004-0002787-000

Hillsbowingh Comey Fire Rescue

	Marie			
Alarm Date and Time	84:09:12 Thursday, January 15, 2004			
Aprical Time	04:16:59			
Controlled Data and Time				
Last Unit Cleans Deto and Time	05:19:34 Thursday, January 15, 2004			
Response Time	0:07:47			
Completed	Yes			
Pire Department Station	973 5			
SAIR:	Å			
Inchicat Type	11.1 - Balleling fire			
Iridal Dispatch Code	12-14,			
Aid Given or Received	N - Name			
Algerra	1			
Action Tyles (11 - Professelsh			
Аррапина - Явурсовіка	\$			
Personnel - Suppression Personnel	13			
Property Lord	\$20,000.00			
Corners Loss	\$15,000.00			
Property Velne	\$20,000.00			
Consum Value	\$15,000.00			
Detector Alasted occupants	_ 1			
Property Use	419 - Let 2 Simily dwelling			
Location Type	Address			
Address				
City, Steet Zip	Tampa, FL			
District	5 · -			
Constant Tract	0717			
Diperjons	11815 MIDDLEBURY DR			

8137415794

Thre					
Замерца Туре	1 - Endoed holding				
Member of Residential	1				
Ana of Origin	09 - Egyen/weit, q@se				
Hent Sounce	13 - Arcing				
Brays, Pitest Ignified	81 - Electrical wire, cable institution				
Carre of ignition	3 - Fellige of aggregation heat aggree				
Contribution To Ignition 1	34 - Theoceatified short-ciprojit are				
Hamm, Factors	Nose				
Suppression Factor 1	NNN - Hund				
Mobile Begigmeent Involved	3 – hovelved in ignition and bound				
Mobile Represent Type	1] - Patamént car.				
Melvilo Equipment Make	FO - Ford				
Mebile Repiputat Medel	Hipodistan				
Mobile Equipment Year	2003				
Mobile Equipment VD?	1FAGEU17L5Y1				
Mobile Boulputent License	U71-BCX				
Mehile Equipment Steps	FL.				
Equipment Type	MNN - Mone				

generalization of the second contract

Incident Report 2904-0802767-008

Hillsburgh Coppy Fire Report

	Birochure					
Sixtes	2 - Occupied and operating					
Floor of Origin. 1						
Building Longth. 25						
Building Width	21					
Total Square Feet	500					
Pire Spread	2 - Confined to room of egigle					
Jam Costributing To Spread	81 - Electrical wirs, cable implicates Yes					
Detector Presence						
Detector Type	1 - Sample					
Delactor Fewer	4 - Hardwire with buttery					
Detector Operation	2 - Detector operated 1 - Alerton occupants, occupants responded.					
Detector Effectivence						
	Authority					
Reported By	76 - Escebio, Anthony					
	06:12:15 Thursday, Jamery 15, 2004					
Officer In Charge	76 - Escobio, Anthony					
_	06:22:44 Thursday, January 15, 2004					
Reviews	*,					
	Normalina					
Nazative Nazeo	CAD Negrativo					
Namethe Type	CAD Nameisc					
Author	CUD UNITED					
Negative Text	[01/15/2004 04:39:28 : POTENZIANUL] STUP CLOCK [01/15/2004 04:38:21 :					
Processor Comple	POTENZIANOL] 10 MINS INTO CAID (01/15/2004 04:30:41 : POTENZIANOL)					
	FIRE UNDER CONTROL [01/15/2004 04:25:00 : POTENZIANOL] CMD ESTAB					
	ON TAC 4 [01/15/2004 04:17/21 : POTENZIANOL) S/S RESED LEGET SMOOTS					
	SHOWING POI/15/2804 04:08:35 : POTENZIANOL] Cross stress: WANDSWORTH					
	DR# GARAGE FIRE					
Nurtative Nume	Now Naturalise:					
Nagrative Type	Incident					
Nametive Desc	06:06:23 Thursday, January 15, 2004					
Author 76 - Escobie, Anthony						
Author Renk CAPT						
Author Assignment	1					
Nazzatiwa Text	We arrived to hight species with the house corners suggide there been telling us these was a					
	the inside the gauge. We entered with our smark line and enterprished a gauge fire that					
	· · · · · · · · · · · · · · · · · · ·					
	stated from fator which that was period acres, 12 hours the day before. The fire secret					
	stated from these vehicle that was parted agen. 12 hours the day halore. The fire surred from the engles communicated spaceting to some materials part stacked on a shall. The					

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SMITH, PHILLIPS, MITCHELL & SCOTT, LLP

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P.O. DEAVER DEL

RATESVILLE, ME 38606

(862) 563-4613 PAX 660 560-166 communithyhillips.com

December 10, 2004 VIA FAX & U.S. MAIL Fax No. 313-390-2107 HERNANDO OFFICIE
WILSOY BLIDG, COLIET SQUASE,
SHE CAPPET FREEET
P.O. BUX SHE
BURNANDO, WE SHEEL
(SHE 480-594)
FAX (WE) 480-594)

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Ms. Shawn L. Norton Claims Analyst Ford Motor Company Park Lane Towers West, Suite 300 3 Park Lane Blvd. Dearborn, MI 48126-2568

RE:

Olive Branch,

Date of Loss: 10-24-04

State Farm Claim No

Dear Ms. Norton:

I received your correspondence of December 8, 2004 requesting certain information with regard to this case. From my correspondence with State Farm, it is my understanding that you already have my client's statement with a description of the incident including events that occurred prior to and subsequent to the loss (the transcript of the fire report. I do not have the police report at this time, but will obtain it as soon as possible.

I have photographs of the location, but they are black and white copies which have been provided to me from State Farm. It is my understanding that you already have these pictures as well.

At this time, we do not have an expert report, nor any photographs as we have not inspected the scene and will not do so until Ford's experts from Newell Investigative Services are available to inspect it with us.

With regard to the repair estimate, etc. (number 7 on your list), it is my understanding that this information has already been provided to you by State Farm.

Ms. Shawn L. Norton December 10, 2004 Page 2

The City and State of occurrence was Olive Branch, Mississippi. The VIN number is 1FMRUI560YI I am not certain what the mileage was at the time, but this should be reflected on the occurrence. The alleged defect has not been confirmed, but it is our position that the fire began in the front engine compartment on the left side just in front of the windshield, where the windshield wiper switches are located.

The affeged defective part has not been repaired or replaced, as the vehicle has not been touched nor moved since the fire.

The current location is the primary residence and location of the fire. To my knowledge, there were no modifications made to the vehicle. The engine was not running, the keys were not in the ignition, and the vehicle was purchased as a used vehicle.

As soon as I have further information, I will be happy to provide it to you. In the meantime, please give me a call if you have any questions.

Sincerely.

Bob Morris

BM/agm

œ:

November 22, 2004

Ford Motor Company
Park Lane Towers West, Suite 400
3 Park Lane Blvd.
Dearborn, MI 48126-2568

RE:

Olive Branch, MS Date of Loss: 10-24-04

Vehicle: 2000 Ford Expedition

Dear Sir or Madame:

Please be advised that we represent which they sustained on October 24, 2004. Our investigation leads us to believe that the source of the fire which caused damage to their home was a 2000 Ford Expedition which had been parked in their garage. It is my understanding that you have already been p aced on notice of this claim by the state of the claim by the claim by the state of the claim by the state of the claim by th

As of the date of this correspondence, the Ford Expedition at issue has not been moved and remains in the exact same location as when the fire occurred. However, due to the substantial damage to the house, repairs do need to be initiated and the vehicle will need to be temoved from the scene at some point.

Before the vehicle is moved, this office wishes to provide Ford the opportunity to inspect the vehicle at the original location and to work with us in arranging a mutually agreeable site to have the vehicle transported to for inspection and testing.

Upon your receipt of this correspondence, I would ask that you please contact my office and confirm notice of our representation. I will be happy to provide you with additional information upon your contacting this office.

Ford Motor Company November 22, 2004 Page 2

Our investigation is ongoing and we are currently waiting on several reports. I hope to have additional information by the time someone from Ford contacts our office.

I will look forward to bearing from you soon.

Sincerely,

Bob Morris

BM/agm

œ:

State Farm Insurance Companies



December 6, 2004

Shawn L. Norton Ford Motor Company Parklane Towers West Suite 300 Three Parkiane Blvd Dearborn, Michigan 48126-2568

te Ferm Insurance Claim Office 125 Guthrie Drive P.O. Box 1019 **Issippi 39871-1019**

Re: Claim Number

Insured: Teresa Webserett MC LADON

Date of Loss: 10-24-04

Insured Vehicle: 2000 Ford Expedition

VIN# 1FMRU1560Y

Dear Shawn.

I have attached with this letter some of the information you have asked for. My insured has retained an attorney to handle this matter for her. Her attorney is **Bob Morris** Smith, Phillips, Mitchell, Scott and Rutherford PO Drawer 1586 Batesville Ms, 38606 (662) 563-4613

Bob ask that you contact him as soon as possible to schedule a time to inspect the vehicle. Bob also stated that he would obtain some of the information you asked for that I have no way of obtaining.

Man Start Branch, Please contact me after reviewing this information I have sent. I look forward to working with you to reach a resolution on this matter. Please contact me at any time with

questions you may have.

Claim Representative

State Farm Insurance

(662) 349-4613

NOME OFFICES: BLOOMINDTON, HUNOIS 61740-0081

PEB4-878 C 3488

Rusty Price					
From Sen To: Sub	nt: Tuesday, November 23, 2004 8:46 AM				
transc	ribed statement				
	ht, this is the second of the here with the second of the second of the 25th of October, 2004 out 4:30 P.M.				
Q. I	It I				
Q. A.	Okay, ar you're aware that this is being recorded? Yes, I am.				
Q. A.	Okey Commence of the interviewing about the about a fire to your 2000 Ford Expedition that occurred on 10-24 of 2004, is that correct? Yes.				
Q. A.	Okey, all right, and where did this fire take place? It was in the garage of my home.				
Q. A.	Okav. and what's that address?				
Q. A.	Okay, and that's In Olive Branch, Mississippi? Yes.				
Q. A.	Okay, all right, about what time of night ma'am? It was, I would say between 2:30 and 2:45 um, in the morning.				
Q. A	A.M., okay, all right, and how long had it been since you had driven the vehicle? Um, approximately 12 to 13 hours. It had been in the garage since Saturday afternoon.				
Q A.	Okay, okay, all right, and you guys just woke up to the house on fire I mean like Uh, my husband woke up and walked by the garage door and saw the flame, he woke me up and that's when we called 911 and the flames were coming out from the hood of the truck.				
Q.	Okay, okay, and what all got burned besides just the truck?				

1

OFFICE MEMO

- A. Um, my attic is gone, the roof, the um, oh, my God the whole, the whole garage, nothing, there's nothing left inside other than boards...
- Q. Yes, malam.
- A. Um, the the whole inside of my house, there is smoke and water damage...
- Q. Um hum.
- A. Um, uh, God, I can't even, e- everything, it's every- the whole thing is ruined.
- Q. Okay, all right, was there, is it a one car, two car garage?
- A It's it's a one and half
- Q. Oksy, but you only had one car in there?
- A. Yes, only one vehicle.
- Q. Oksy, where was the other vehicle parked?
- Um, my husband's work vehicle was parked outside the garage in the driveway.
- Q. Okay, did it get any damage on it or anything?
- A. No.
- Q. Okay, all right, was it just you and your husband home?
- A. Yes.
- Q. Okay, you don't have any kids or anything?
- A. I have three but they were with their dad.
- Q. Okay, okay, all right, now y- it's my understanding you've done some research and you've found that Ford, especially between '99 and 2000 the Ford Expedition has had problems like this before?
- A. Yes, there is it w- seems to be a common occurrence.
- Q. Oksy, and what what have you found ma'am?
- A. Um, I have found other Expeditions either in the par- in the um, garage or driveway, even in a parking lot where the vehicle has been left unattended and no keys in the ignition and it catches on fire.
- Q. Okay, it just burns up?
- A. Yes.
- Q. Huh, and what are what are you what did they tell you that attributes to this?
- A. Um, on the website the people having the for-holding the forums are saying that they have had recalls on their wiper w- windshield wiper motors...

Q. A.	Okay. And even even after replacement they tend to catch fire.
a.	Still catch fire, okay, so your husband he got up about sometime around 2:30, 2:45 and he he he saw farnes coming out from under the hood?
A.	Yes, sir.
a. A.	Okay, and do you have a garage door and everything? Yes, sir.
Q. A	Was it down? Yes, the garage was closed.
Q.	Okay, all right, wow, but you have some material that shows where other vehicles have done this before?
A	Yes, sir, I do.
Q.	Okay, all right, at this time that's really all I have I guess you you guys called the fire department?
A.	Yes, sir and my husband has gone uh, right now, they said the uh, report would be ready this afternoon so
Q. A.	Cksy. He's gane by to pick it up.
	•
Q. A.	Okay, okay, all right, once again restate you do know this was recorded? Yes.
Q. A.	And everything you stated is the true version to the best of your knowledge? That is correct.
Q.	Okay, this ends the re(tape ends)
TEFI	75353753 N22

•



City of Olive Branch FIRE DEPARTMENT INCIDENT REPORT

Date: 15/24/6/	Incide	nt# <u>/2819</u>	Location:			
Times	1	Owser Preparty Info:			Vehicle Infe:	
Dispatch 23:	: (/4	Name:			Make FORD	
Responding 03	<u>: чи</u>	Addres			Model Expendies	
Scene <u>53</u>	: 4n. c	City Dive Blance State MS		Year <u>1333</u>		
Control <u>D3:</u>	<u> 12. </u>	Phoes #			Tag# <u>\//A</u>	
Clear by	57 1	Fenant Name		State		
Type of Inchinat		Actions Taken		· ·	Property Use	
Type of Inchinat Paint Ainm Dispatcheti—cancelled circuit Structure Fire BMS Amistance Call Motor Vehicle Accident Cooking Pier Chimaty Fire Trash Fire Passenger Vehicle Fire Grant Fire Gast Lack (natural or LPG) Custon Mittension incident Overheated Motor Light Stalled Power Line Down Unsethorized Baraing Odor of gast Lightning Strike (no fire) Plood Assessment		Actions Taken (mark m stony m epply) Provide Hasic Life Support Estinguish Search Ventilation Funcible Heavy Restac, reserve from harm Estivate, Discretagic Haz Mat Denetion Haz Mat Removal Powents Area Restore fire places system Shat depen fire along system Provide memphoter Investigate Cancelled Baronic Notify Other Agencies		Single Family Residualist Math Panely Residualist Church, or other Library Schools, non adult Restantist Mercantile/tenious Testile weming appurel Fatelleare/familians/appliances Convenience Stare Office Building Grocery Stare General Retail Warehouse Manufacturing Starage/other City Street Highouty Packing Lot		
Other: Other: Other: Other:						
(4)	A. GIVENS		A. Paulio	_W	Gailesta	
B3 84 (T)	3. MODERE		W. Halfres	<u> </u>		
971 HM3 R1	B. BRASI		J. BLATDED			
100 101 T. Bashy						
M41 M42 M43	R. Rials	 _	D. TAYLOR			

