

PE04-078

FORD

1/28/2005

ATTACHMENT F

BOOK 8 OF 12

PART 6 OF 6

200 - 06033

Cause No. _____

████████████████████

Plaintiff,

vs.

FORD MOTOR COMPANY,
Defendant.

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IN THE DISTRICT COURT

HARRIS COUNTY, TEXAS

§
§ JUDICIAL DISTRICT

PLAINTIFF'S ORIGINAL PETITION

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, STATE FARM MUTUAL AUTO AS SUBROGEE OF ██████████
██████████ hereinafter referred to as "Plaintiff," and complains of **FORD MOTOR**
COMPANY, a Delaware Corporation, hereinafter referred to as "Defendant," and for cause of action
would respectfully show the Court as follows:

I. DISCOVERY

Discovery in this suit is intended to be conducted under Level One of the Texas Rules of
Civil Procedure unless otherwise ordered by the Court.

II. PARTIES AND VENUE

1. Plaintiff, as the real party in interest, is an insurance company doing business in the State of Texas.
2. Defendant, **FORD MOTOR COMPANY**, is a Delaware Corporation doing business in the State of Texas that may be duly served with citation by serving its registered agent, *CT Corporation Systems*, 350 N. St. Paul Street, Dallas, Dallas County, Texas 75201.
3. The "Vehicle" referenced in this lawsuit refers to a 2000 Ford F-150 Pickup, bearing Vehicle Identification Number 1PTRX17WXY ██████████

5. Venue of this suit is proper in Harris County, Texas, pursuant to Section 15.002 of the Texas Civil Practice and Remedies Code because all or a substantial part of the events or omission giving rise to the claims made herein occurred in Harris County.
6. The Court has jurisdiction over Defendant because Defendant is qualified to do business in the State of Texas, and, at the time this cause of action accrued, was conducting business in this state. The Court has jurisdiction over the controversy because the damages sought are within the jurisdictional limits of this Court.

III. NOT TO BE DISSEMINATED TO THE JURY

This is a subrogation matter. Plaintiff would show that State Farm Mutual Auto Insurance Company, an insurance company doing business in the State of Texas, has paid the named Plaintiff for a portion of the damages which he incurred and which resulted from the events described herein. Therefore, State Farm is entitled to seek recovery for such damages against Defendant as a real party in interest. The named Plaintiff has subrogated his rights to State Farm Mutual Auto Insurance Company to the extent of such benefits paid in this matter.

IV. PRODUCTS LIABILITY

This lawsuit involves allegations of defects in the design and/or manufacturing of a *2006 Ford F-150 Pickup* (hereinafter referred to as "Vehicle").

At all times relevant to this claim and Plaintiff's cause of action, Defendant FORD was the manufacturer and assembler of the Vehicle.

V. FACTS

On or about September 20, 2003, [REDACTED] Vehicle caught fire and sustained considerable damage. [REDACTED] had parked the Vehicle in the parking lot of his residence. Later that day, he heard a fire truck, and went outside to the parking lot to discover that his Vehicle was on fire. By the time he reached the Vehicle, it was fully engulfed in flames. Investigation revealed that the fire was caused by an electrical short in the engine compartment.

VI. CAUSES OF ACTION AGAINST DEFENDANT FORD

Count One – STRICT LIABILITY

Plaintiff incorporates by reference the foregoing paragraphs the same as if fully set forth herein.

Defendant FORD is strictly liable to Plaintiff for designing, manufacturing, and placing into the stream of commerce a vehicle which was unreasonably dangerous for its foreseeable use at the time it left the control of Defendant FORD. The Vehicle contained a design and/or manufacturing defect which was the producing and/or proximate cause of the fire.

The Vehicle was defective and unsafe for its intended purpose at the time it left Defendant's control and was placed into the stream of commerce by Defendant FORD.

Based on the foregoing, Plaintiff invokes the Doctrine of Strict Liability.

Count Two -- NEGLIGENCE

Plaintiff incorporates by reference the foregoing paragraphs the same as if fully set forth herein.

Defendant FORD was negligent in the design, manufacture and marketing of the product in question. Defendant FORD knew, or in the exercise of ordinary care, should have known, that the Vehicle was defective and unreasonably dangerous to those persons likely to use the product for the purpose and in the manner for which it was intended to be used. Defendant FORD was negligent in the particulars set forth in this and the preceding paragraphs and such negligence was a proximate cause of the fire.

Defendant FORD owed [REDACTED] a duty of reasonable care when it designed, manufactured and marketed the Vehicle. Defendant FORD's negligent acts or omissions include, but are not limited to, the following:

1. Supplying the defective Subject Vehicle, which Ford knew or should have known subjected the Plaintiff's property to an unreasonable risk of harm;
2. Supplying the Subject Vehicle which was defective and unreasonably dangerous to persons and other property;

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PLANSHEET ORIGINATOR: PE 021005N - 0 SCALE 1
- state (army) - 200001 (plansheet) - 001

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In this connection, Plaintiff will show that the character of the occurrence giving rise to the litigation is such that it would not have happened in the absence of negligence, and that the design and manufacture of the Vehicle was within the exclusive control of Defendant FORD at the time the negligence probably occurred. Plaintiff has no means of ascertaining the method or manner in which the Vehicle was designed, manufactured, and/or tested.

In the alternative, and in the event Plaintiff is unable to prove specific acts of negligence in design, manufacture, testing, and/or marketing, Plaintiff asserts and relies on the doctrine of *Res Ipsa Loquitur*.

VIII. DAMAGES

As a result of Defendant's negligence and its breach of express and implied warranties, Mr. Harrington sustained damage to his vehicle in at least the amount of \$17,582.55. After allowing for all just and lawful offsets, payments, and credits, of which there have been none, Defendant continues to be indebted to Plaintiff in the amount of at least \$17,582.55.

Plaintiff hereby asserts its claim for reimbursement of damages sustained, against Defendant.

IX. REQUEST FOR DISCLOSURE

Under the authority of Texas Rule of Civil Procedure 194, Plaintiff requests that Defendant disclose, within fifty (50) days of the service of this petition and request, the information or material described in Rule 194.2.

PRAYER

WHEREFORE, PREMISES CONSIDERED, Plaintiff, STATE FARM MUTUAL AUTO AS SUBROGEE OF BRIAN HARRINGTON, requests that Defendant FORD MOTOR COMPANY be cited to appear and answer herein, and that on final hearing, Plaintiff recover:

PLAINTIFF'S ORIGINAL PETITION - PAGE 6
s:\state farm auto\250.161\plead\original.pet

- a. A judgment against Defendant for actual damages in the amounts stated herein.
- b. A judgment against Defendant for pre- and post-judgment interest as allowed by law.
- c. A judgment against Defendant for court costs incurred by Plaintiff, and
- d. A judgment for such other and further relief, both general and specific, at law and in equity, to which Plaintiff may be justly entitled.

Respectfully submitted,

CARPENTER LAW FIRM, P.C.

By: 

N. Scott Carpenter
State Bar No. 00790428

James P. Acosta
State Bar No. 24001622

Lakeside Commons
5045 Lorimar, Suite 280
Plano, Texas 75093
(972) 403-1133
Fax (972) 403-0311

**ATTORNEYS FOR PLAINTIFF
STATE FARM MUTUAL AUTO AS SUBROGEE OF
BRIAN HARRINGTON**

Count Three -- BREACH OF EXPRESS AND IMPLIED WARRANTIES

Plaintiff incorporates by reference the foregoing paragraphs the same as if fully set forth herein.

Defendant FORD, by and through the sale of the Vehicle, held out to the general public and to Mr. Harrington specifically, that its vehicle would conform with the qualities of same or similar vehicles and was fit for the purposes for which it was intended.

██████████ made use of the Vehicle as alleged herein, and relied on FORD's express and implied warranties. Contrary to these warranties, the Vehicle was not fit for its intended use rendering it unreasonably dangerous. Defendant FORD breached this warranty by, among other things:

- a. Failing to manufacture, assemble, inspect, test, supply, distribute and/or sell the Subject Vehicle in a good and workmanlike manner; and
- b. Supplying ██████████ with the Subject Vehicle, which was not merchantable or fit for its ordinary use.

Defendant FORD's breach of warranties rendered the Vehicle unreasonably dangerous and was a proximate and producing cause of the fire and the resulting property damage suffered by Mr. Harrington.

VII. RES IPSA LOQUITUR

Plaintiff cannot more specifically allege the acts of negligent design and manufacture on the part of Defendant FORD for the reason that facts in that regard are peculiarly within the knowledge of Defendant FORD.

State Farm Insurance Companies



November 26, 2003

17351 Fulsom Road
P.O. Box 199017
Columbus, GA 31919-0017
(678) 257-6077
Fax: (678) 257-6076

Ford Motor Co.
Parklane Towers West, Ste. 400
3 Parklane Blvd
Dearborn, MI 48126

RE: Claim Number: [REDACTED]
Date of Loss: September 20, 2003
Our Insured: [REDACTED]
Year/Make/Model: 2000 Ford F150
VIN: 1FTRX17WXY[REDACTED]

Dear Ford Motor:

This vehicle was insured by State Farm and involved in a comprehensive loss. The claim settled for \$16,729.24, which includes our insured's deductible.

Our investigation establishes the cause of loss was due to a fire at the brake master cylinder.

Enclosed is our documentation. We will retain the evidence until we conclude this matter with your company. You may contact me to arrange for inspection of the vehicle.

Please consider this notice as our demand for reimbursement.

Sincerely,

Tonya Bedell

Tonya Bedell - Team 40
Claim Representative
(972) 732-4842 Ext. 40

State Farm Mutual Automobile Insurance Company,

Enclosures

- F1
- 9/26/03
- ALL FILES
- VIN
- 11/6/03

HOME OFFICES: BLOOMINGTON, ILLINOIS 61710-0001



INVESTIGATIVE CONSULTANTS, INC.

CAUSE & ORIGIN REPORT

ICI FILE # 203-10-302
CLAIM # [REDACTED]

PREPARED FOR:

**STATE FARM INSURANCE COMPANY
REQUESTOR: RICK BAISCH**

PREPARED BY:

**ROBERT A. MINOR, CFEI, CVFI
FIRE INVESTIGATOR**

All information contained within this report is privileged and confidential. Reports are furnished to our clients only, and release of any and all information contained within them is the sole responsibility of the client.

2205 W. Division St. • #G-3 • Arlington, Texas 76012
Metro 817-469-1848 • Local 817-459-0922 • Fax 817-460-4677

CONFIDENTIAL

INVESTIGATIVE CONSULTANTS, INC.
2205 W. DIVISION, SUITE #G-3
ARLINGTON, TEXAS 76012
METRO (817) 469-1848 LOCAL (817) 459-0922

NAME: [REDACTED]	TYPE OF INVESTIGATION:
CLAIM # [REDACTED]	CAUSE & ORIGIN
ICI #: 203-10-302	ACCOUNT #: 155
DATE OF LOSS: 9-20-03	REPORT DATED: 11-19-03
LOSS LOCATION:	REQUESTOR: [REDACTED]
[REDACTED]	PHONE: [REDACTED]
HOUSTON, TEXAS	

REQUEST: On October 16, 2003, Mr. Rick Baisch of State Farm Insurance Company requested a fire origin and cause investigation of a fire loss in a 2000 Ford F-150 pickup that was currently being stored at the facilities of [REDACTED] (BCAP) located at [REDACTED] in Houston, Texas. The fire reportedly occurred on September 20, 2003.

ENCLOSURES:

1. Recall Information from the National Highway Traffic Safety Administration
2. Consumer Complaints Information from the National Highway Traffic Safety Administration
3. Photograph Documentation

PERSONS CONTACTED:

1. [REDACTED]
Vehicle owner interviewed by telephone
[REDACTED] (Home) [REDACTED] (Cell Phone)

PROPERTY DESCRIPTION: The fire damaged vehicle was a 2000 Ford F-150 pickup with a vehicle identification number (VIN) of 1FTRX17WXYK [REDACTED] BCAP had assigned the Stock Number 3024973 to this vehicle.

FIRE SCENE EXAMINATION: Examination of the fire damaged vehicle was initiated at the facilities of [REDACTED] in Houston, Texas at approximately 8:30 a.m. on October 21, 2003.

NAME: [REDACTED]
CLAIM: [REDACTED]

PAGE = 1

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Exterior examination revealed evidence of severe fire damage to the engine compartment and to the passenger compartment of the vehicle (Photographs #1 through #6). At the time of my examination, Texas Truck license plate number [REDACTED] was affixed to the rear bumper of the vehicle (Photograph #7). The manufacturer's identification label on the driver's side door post revealed that the vehicle had been manufactured by Ford Motor Company, USA in October of 1999 (Photograph #8). The VIN on the label was 1FTRX17WXY [REDACTED].

Examination of exterior fire damage on the driver's side of the vehicle revealed that the most severe fire damage was in the area of the engine compartment (Photograph #9). The aluminum hood above the engine compartment had melted away as a result of the fire. The driver's side front tire of the vehicle was fire damaged and deflated (Photograph #10). The aluminum alloy wheel rim was fire damaged, but had not melted. Fire damage to the exterior surface of the driver's side door was essentially limited to the upper hinge side of the door (Photographs #11 and #12). The side view mirror in this area was missing from the vehicle at the time of my examination. Limited fire damage was apparent at the side window for the rear seat area on the driver's side of the vehicle (Photograph #13). The driver's side rear tire of the vehicle was fully inflated and exhibited no evidence of fire damage (Photograph #14).

Examination of exterior fire damage on the passenger's side of the vehicle also revealed that the most severe fire damage was in the area of the engine compartment (Photograph #15). The aluminum hood above the engine compartment had melted away as a result of the fire. The passenger's side front tire of the vehicle was fire damaged and deflated (Photograph #16). The aluminum alloy wheel rim was fire damaged, but had not melted. Fire damage was apparent on the painted exterior surfaces all the way around the window in the passenger's side door (Photograph #17). Fire damage to the exterior surface of this door was significantly more severe than the fire damage to the exterior surface of the driver's side door. Fire damage at the side window for the rear seat on the passenger's side of the vehicle (Photograph #18) was also more severe than it was at the side window on the driver's side of the vehicle. The passenger's side rear tire of the vehicle was fully inflated and exhibited no evidence of fire damage (Photograph #19).

Examination of the windshield area of the vehicle revealed that virtually the entire windshield had melted out as a result of the fire (Photographs #20 through #22). The only windshield glass that remained in the windshield frame was near the top of the driver's side of the windshield. The absence of windshield glass on top of the instrument panel area of the vehicle suggests that the fire had breached the bottom of the windshield first. This is an indication that the fire had traveled into the passenger compartment from the engine compartment of the vehicle.

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Severe fire damage was apparent inside the passenger compartment of the vehicle (Photograph #23). The instrument panel exhibited evidence of very severe fire damage (Photographs #24 and #25). Heat damage to the engine compartment bulkhead below the windshield was more severe on the driver's side of the vehicle (Photograph #26). Severe fire damage had occurred to electrical wiring in the area of the instrument panel, but no evidence of electrical failure was found to indicate a source of ignition for the fire. The steering wheel had been very severely damaged by the fire and the upper half of the steering wheel had melted away (Photographs #27 and #28). The upholstery on the seats of the passenger compartment had been consumed by the fire (Photograph #29). Severe fire damage was apparent on the interior surface of the passenger's side door (Photograph #30). The upholstery on the rear seats of the passenger compartment had been consumed by the fire and a set of golf clubs on the rear floorboard had been destroyed by the fire (Photographs #31 and #32). Fire damage to the interior surface of the driver's side door (Photographs #33 and #34) did not appear to be as severe as that which had occurred at the passenger's side door.

The most severe fire damage was apparent in the engine compartment of the vehicle (Photographs #35 through #38). The entire aluminum hood of the engine compartment had melted away as a result of the fire. Fire damage to the front of the engine was more severe on the driver's side of the engine than on the passenger's side of the engine (Photograph #39). The driver's side valve cover and the timing chain cover had been destroyed by the fire (Photograph #40). The passenger's side valve cover and timing chain cover were severely fire damaged, but remained relatively intact (Photograph #41). Examination of the alternator revealed that the aluminum alloy housing of the alternator had melted away (Photograph #42). The melting of the aluminum housing was more severe on the driver's side of the alternator. The battery and battery cables on the passenger's side of the engine compartment had been severely damaged by the fire (Photographs #43 and #44). The electrical wiring harness along the top of the engine compartment bulkhead had also been severely fire damaged (Photographs #45 and #46). No evidence of electrical shorting was found in this wiring harness to suggest that it had caused the fire.

Very severe fire damage was apparent in the area between the engine and the driver's side front wheel well of the vehicle (Photograph #47). The brake master cylinder was found to be missing from its mounting bolts on the brake vacuum assist chamber on the driver's side of the engine compartment bulkhead (Photograph #48). No fire damaged remains of the master cylinder were found during the course of my examination. Severe fire damage was apparent to the ABS pump located forward of the location of the master cylinder (Photograph #49 and #50). Examination of electrical wiring found near the ABS pump revealed evidence of melting in some of the copper conductors and fusion of

CONFIDENTIAL

copper strands in some of the conductors (Photographs #51 and #52). The conductors appeared to have melted as a result of electrical activity.

At approximately 10:30 a.m. on November 4, 2003, I attempted to call the owner of the fire-damaged vehicle, [REDACTED] at his home telephone number of [REDACTED]. There was no one at home and I left a voice mail message asking [REDACTED] to call me.

At approximately 12:45 p.m., [REDACTED] returned my call. After identifying myself, I asked [REDACTED] how long he had owned the vehicle prior to the fire. [REDACTED] stated that he had owned the vehicle since December of 1999. When I asked [REDACTED] if he had experienced any problems with the vehicle prior to the fire, he stated that he had not. When I asked [REDACTED] if he was driving the vehicle at the time of the fire, he stated that he was not and that it had been parked for approximately four hours when it caught fire.

When I asked [REDACTED] where the vehicle was parked, he stated that he lives in a condominium and that the vehicle was parked in the condominium parking lot. When I asked [REDACTED] if any other vehicles were damaged as a result of the fire in his vehicle, he stated that there were no vehicles parked next to his vehicle when it caught fire, so no other vehicles were damaged. When I asked [REDACTED] how he first became aware of the fire in his vehicle, he stated that he was at home watching television and heard the fire trucks outside. [REDACTED] stated that when he opened the door of his condominium, he saw that his vehicle was on fire. When I asked [REDACTED] if the doors of the vehicle were open or closed at the time of the fire, he stated that they were closed. [REDACTED] stated that he was the only person who had keys to the vehicle.

When I asked [REDACTED] if he had experienced any problems with the cruise control on the vehicle prior to the fire, he stated that he had. When I asked [REDACTED] what type problems he had experienced with the cruise control, he stated that it had quit working a few months prior to the fire.

The Recall Database from the National Highway Traffic Safety Administration was reviewed for recalls on 2000 Ford F-150 pickups. No recalls were found that could be identified as the possible cause of the fire that had occurred in the vehicle that is the subject of this report.

The Consumer Complaints Database of the National Highway Traffic Safety Administration was then reviewed for complaints of fires in the engine compartment of the vehicle. Several complaints of electrical problems that reportedly resulted in fires

NAME: [REDACTED]
CLAIM # [REDACTED]

PAGE # 5

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were found. No specific point of failure was identified in the complaints that were reviewed.

CONCLUSION: It is my opinion that this fire originated on the driver's side of the engine compartment. The severity of the fire damage in this area of the engine compartment was consistent with the fire having originated at or near the driver's side end of the engine compartment bulkhead where the brake master cylinder had been located. This opinion is based on my examination of the fire damaged vehicle, on my evaluation of burn patterns found on the vehicle, and on my telephone interview with the vehicle owner, [REDACTED].

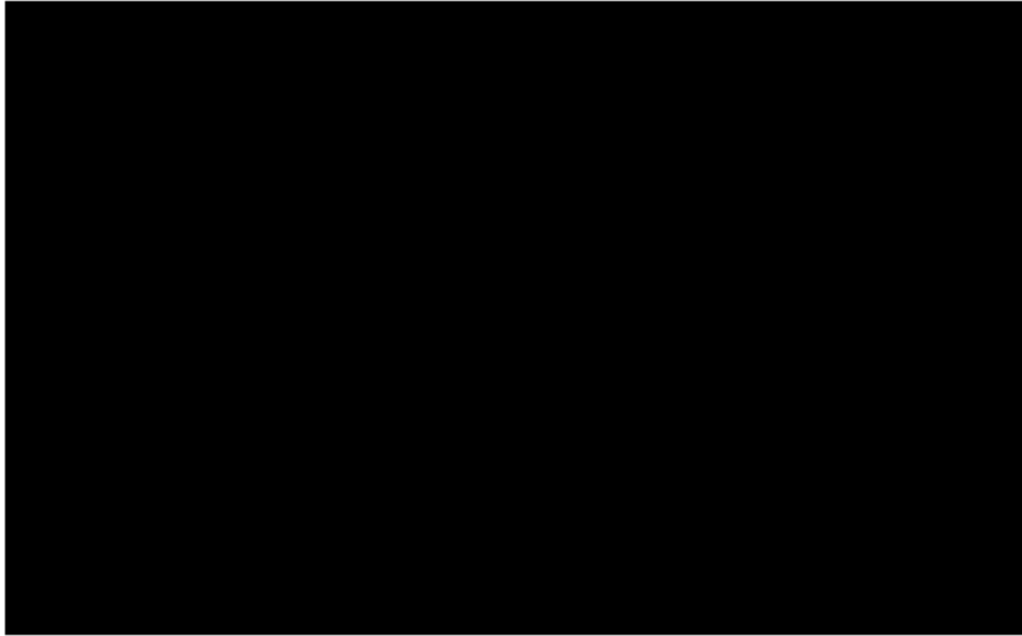
The cause of the fire could not be determined. The brake master cylinder and the cruise control deactivation switch that was attached to the master cylinder were missing from the vehicle at the time of my examination. The possibility of an electrical failure in the cruise control deactivation switch located at the forward end of the brake master cylinder or the electrical wiring to the switch could not be eliminated as the cause of the fire. Suspected failures in this switch have been identified by other fire investigators as having been the possible cause of fires in late model Ford F-150 pickups. Failures in similar switches have been identified as having been the cause of fires in 1992 and 1993 Lincoln Town Cars. Evaluation of the cruise control deactivation switch and its electrical wiring by an electrical engineer would be necessary in order to identify a specific point of failure in the switch or its wiring.

The opinions and conclusions expressed in this report are based on information available to me when the report was prepared. Should additional information become available subsequent to the issuance of this report, I reserve the right to determine the impact of the new information on my opinions and conclusions, and to amend my opinions and conclusions if warranted by the discovery of the new information.

INVESTIGATION CONDUCTED BY:

Robert A. Minor, CFEI, CVFI
Fire Investigator

RAM/mg



State Farm Insurance Companies



248 Brodhead Road
PO Box 25017
Lehigh Valley, PA 18003-8731

November 8, 2004

RFC

2004

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

498349
CL 11/04

RE: Claim Number: [REDACTED]
Date of Loss: May 22, 2004
Our Insured: [REDACTED]

Dear Shawn L. Norton:

Enclosed please find the information you had requested regarding our subrogation claim for an engine fire which occurred in our insured's 2000 Ford F150 Pickup, vin 1FTRX18L3YM [REDACTED]

The vehicle is located at North East Penn Salvage. Their address is [REDACTED] Pittston, PA [REDACTED]. Their phone number is [REDACTED]. The vehicle stock number is 44554A.

Please advise when you have completed inspection so we may sell the salvage to complete our subrogation request. Thank you.

Sincerely,

Jim Neupauer
Jim Neupauer CPCU
Claim Representative
(610) 317-7547

State Farm Mutual Automobile Insurance Company

- WSD 1/19/00 (exp 1/19/04) - F106
- ESP-NO
- UCC + BOW (exp 1/19/04) - BATH, PA
- 4 YRS. - + 581814 (A)
- Exp. yes - #21584

State Farm Insurance Companies®



June 11, 2004

Bethlehem Service Center
248 Brocton Rd.
PO Box 25017
Lehigh Valley, PA 18003-9731

FORD MOTOR COMPANY
PARKLANE TOWERS W STE 400
3 PARKLANE BLVD
DEARBORNE MI 48126-2568

RE: Claim Number: [REDACTED]
Our Insured: [REDACTED]
Date of Loss: May 22, 2004
Make, Model and Year of Product: 2000 Ford F150 Pickup
Vinc: 1FTRX18L3YN [REDACTED]

Dear Sirs:

The identified vehicle is insured by State Farm Mutual Automobile Insurance Company. This vehicle experienced a fire in the engine compartment.

State Farm® would like to give you the opportunity to inspect the vehicle and give you advance notice of our potential subrogation claim.

Please contact me at (610) 317-7547 to set up a time for your inspection.

Sincerely,

Jim Neupauer, CPCU
Claim Representative
(610) 317-7547
State Farm Mutual Automobile Insurance Company

JN/662/0611013

PC04-078 C 3431



36-K443-073 OC



Office of the General Counsel

PRELIMINARY & CONFIDENTIAL

Ford Motor Company
Parklane Towers West
Suite 200
Three Parklane Boulevard
Dearborn, Michigan 48128-2000

June 28, 2004

RE

JUL 02 2004

State Farm Insurance
PO BX 25017
Lehigh Valley, PA 18003-9731
ATTENTION: JIM NEUPAUR

Bethlehem Mail & File

RE: Claimant: [Redacted]
Your Claim #: [Redacted]
DOL: 05-22-04

Dear Mr. Neupaur:

We acknowledge your recently submitted subrogation claim. In order to assist us in evaluating your claim, we request that you provide us with the following information: (Please note that the information requested is in regard to the Ford manufactured vehicle.)

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

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

- 9. What was the city and state of occurrence: Beth, Pennsylvania
- 10. The 17 digit vehicle identification number: NA1ETB1R63Y[Redacted]
- 11. What was the mileage at time of occurrence: 216,588 - Actual Unknown
- 12. What is the alleged defect: Fuel Leak
- 13. Has the alleged defective part been repaired or replaced? (circle one) Yes or No

14. What is the current location of the vehicle, and the alleged defective part(s)?

[REDACTED] - PITTSBURGH, PA [REDACTED]

15. List all after market additions or modifications that were made to the vehicle:

N/A

16. Was the engine running? (circle one) Yes or **NO**

17. Were the keys in the ignition? (circle one) Yes or **NO**

18. Was this vehicle purchased new or used: used

If purchased used, provide the date of purchase, mileage at the time of purchase, and from whom the vehicle was purchased: 3-19-2003 44,972 Unknown

Once we are in receipt of the requested information, it will be reviewed and you will be notified of our decision concerning your claim. Should you not send all of the requested information and materials, we will assume that you are not interested in pursuing a claim and we will close our file. Please note that your vehicle will not be inspected until all the above information has been submitted and a determination has been made as to whether an inspection is warranted.

Please be advised that all necessary steps should be taken to ensure that the subject vehicle and all of its component parts are maintained and preserved for trial. Ford Motor Company has the right to inspect the vehicle and remove and test any component part that you claim to be defective, and to be presented with the vehicle and the subject component part(s) at the time of trial, should litigation ensue from this informal claim.

If you propose to repair the vehicle for continued usage, such repairs may not be performed until after Ford Motor Company has inspected the vehicle and removed and tested any component part you claim to be defective or advised you in writing that it does not intend to perform such inspection and/or testing at this time. But even in that event, Ford Motor Company will insist that all components claimed to be defective are maintained and preserved for trial.

Sincerely,



Shawn L. Norton
Claims Analyst /
Litigation Assistant

Colonial Regional Police Department

CRP-04-06185 05/22/2004

OFFICER: 808

MICHAEL S. MELINSKY

Investigation Accident Arrests Made Suspects

Incident Report Form

1. Log Number CRP-04-06185	1a. Incident Number 04-3452	1b. File Number	1c. Case Number	2. UCR
3. Incident Type 3840 ASSIST FIRE DEPARTMENT - A		4. Dispatcher	5. Source	6. District 01
7. Status	8. Disposition CLEAR CLOSED / CLEARED			
6. Date Received 05/22/2004	6a. Rcvd 1154	6b. Disp 1154	6c. Arrv 1155	6d. Clrd 1310

INCIDENT OCCURRED AT OR BETWEEN 6e. Earliest Date and Time 6f. Latest Date and Time

10. Location BATH PA	10a. Cross Street	10b. Intersection <input type="checkbox"/>
11. Premise Code	12. Business Name	

13. Mode of Operation Coding	VICTIM
ENTRY:	PROPERTY:
EXT:	AREA:
METHOD:	TIME OF DAY:

14. Caller / Complainant Type **Not Available**

15. Involved Persons	STREET ADDRESS	INVOL	DOB	SSN	R	S	PHONE			
J	AR DATE	ARREST#	PRCHG	DESCRIPTION	CR	ADDCHG	DESCRIPTION	CR	PL	VI

16. Involved Vehicle	STATE	PTYPE	INVOL	YEAR	MAKE	MODEL	COLOR	VIN
	PA	FU			FORD	F15	RED	

17. Name / Vehicle Involvement	NAME	INVOL	PLATE	ST	YEAR	MAKE	MODEL	COLOR
		DROW		PA		FORD	F15	RED

25. Comments / Narratives	CREATED BY / ON	UPDATED BY / ON	LOCK
04-3452 - 8908	SHANDA 05/24/2004	SHANDA 05/24/2004	N

Complainant parked his truck in his driveway at approximately 1130 hours. He smelled smoke at approximately 1154 hours and found the engine compartment fully engulfed. Upon my arrival, I attempted to knock the flames down using my extinguisher and 4 or 5 others supplied by neighbors. Bath Fire was assisted by Klecknersville. Smoke and minor fire damage resulted to

RECORDED

SEP 07 2004

To Whom It May Concern,

On May 22, 2004 my 2000 Ford F150 pickup started on fire while parked in my driveway. In this letter I will explain what happened prior to and subsequent to the fire.

On May 22, 2004 my girlfriend and I left the house to go check out some yard sales. I drove the truck a total of 9.1 miles and made six stops. At the first five stops I turned the engine off and was out of the truck ten minutes or less at each stop. Then at the last stop I stayed in truck while it was running. I was idling for about 5-10 minutes and then drove home and parked in my driveway. We were only home a couple of minutes when one of our friends came over with her kids. We all left the house and walked up my street, then back down to my house so we could check out more yard sales. That took about half an hour. All of us came back into the house and I turned a fan on which was sitting by a window in my living room. About 10-15 minutes later our friend said she smelled something burning, so I looked over at the fan right away and seen smoke coming from it. I went over to the fan cause I thought maybe the fan was overheating or something, but it wasn't, so I looked out the window and seen that smoke was coming from my truck, did not see any flames, which was right outside the window. I then quick ran out the front door to look into why my truck was smoking. When I got outside there were flames coming out from under the hood and it only took a matter of seconds from the time I noticed the smoke till I got outside. I ran back in the house and dialed 911 and told them my truck was on fire. 911 told us to vacate the house and wait for help to arrive. Within a couple of minutes after hanging up with 911 a Colonial Regional Police Officer arrived. He tried to put the fire out using his fire extinguisher and two of my neighbor's fire extinguishers. In the mean time the Bath Volunteer Fire Department arrived and put the fire out.

Sincerely,



Anthony M. Thierer
September 2, 2004

K443-073



M O R R I S E

DA

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7) 8715

PERA-878 C 3436

0121

PROFESSIONAL SERVICES:

Fire and Explosion Analysis

Environmental Investigations/Compliance Issues

Automotive Investigations

Fraud Investigations

Litigation Accounting

Litigation Support Services

Reconstruction of Financial Backgrounds

Investigation and Search Procedures

Workman's Compensation Investigations

Mandatory Drug Testing

Polygraph Services

Accident Reconstruction

Accident Photographs/Scene Drafting

Engineering

Inland Marine/Property Asset Survey

Certified Courses Given

Certified Fraud Examiners on staff to assist during the investigation.

TERRITORY COVERAGE: PA, MD, VA, WV, DE, NJ, OH & DC.

CASUALTY CONSULTANTS INC.

PO Box 1237
Lebanon, PA 17042
(717) 273-8888
FAX (717) 273-8715

JOHN R. BAINBRIDGE JR.
President

June 16, 2004

STATE FARM INSURANCE COMPANY
PO Box 25017
Lehigh Valley, PA 18003

Attn: Jim Neupauer/Claims

RE: Vehicle Fire Examination

Insured: [REDACTED]
Date of Loss: May 22, 2004
Date of Assignment: June 11, 2004
Date of Forensic Examination: June 14, 2004
Date of Written Confirmation: June 16, 2004
Claim #38-K443-073

CCI File #081104150

Dear Mr. Neupauer:

DISCLAIMER

THE FOLLOWING INFORMATION CONTAINED IN THIS WRITTEN REPORT CONTAINS THE MENTAL IMPRESSIONS, OPINIONS, AND CONCLUSIONS OF THIS INVESTIGATOR, REGARDING THE INVESTIGATION INTO THE RECENT VEHICLE FIRE CLAIM INVOLVING THIS 2000 FORD F150 OWNED BY ANTHONY THIERER.

THIS INFORMATION WILL REMAIN AS CONFIDENTIAL AND PRIVILEGED INFORMATION FOR STATE FARM INSURANCE COMPANY AND THEIR LEGAL COUNSEL AND MAY ONLY BE RELEASED BY THE ADDRESSEE.

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This correspondence will serve to document this cause and origin investigation under Casualty Consultants, Inc. "FAST TRACK PROGRAM". If at any time in the future you have the need for full and complete documentation of this file, Casualty Consultants, Inc. has retained all pertinent information for your convenience.

On Monday, June 14, 2004, this investigator traveled to North East Penn Salvage, Pittston, PA, and examined the risk vehicle.

During the course of this investigation, Casualty Consultants, Inc. conducted a computerized vehicle identification number inquiry and discovered the following information:

VEHICLE HISTORY REPORT

VEHICLE SPECIFICATIONS:

Vehicle ID: 1FTRX18L3YA [REDACTED]
Yr/Mfg: 2000 Ford
Model: F150
Body: 4 DR Extended Cab Pickup
Engine: 5.4L V8 PFI SOHC 18V
Fuel: Gasoline
Driveline: 4-wheel Drive
Aspiration: Normal
Country Mfg: United States

TITLE HISTORY:

<i>Salvage/Junk Title</i>	<i>Checked/No Problem Title Found</i>
<i>Rebuilt/Reconstructed Title</i>	<i>Checked/No Problem Title Found</i>
<i>Flood Damage Title</i>	<i>Checked/No Problem Title Found</i>
<i>Damage Disclosure Title</i>	<i>Checked/No Problem Title Found</i>
<i>Manufacturer Buyback (LEMON) Title</i>	<i>Checked/No Problem Title Found</i>
<i>Exceeds Mechanical Limits Title</i>	<i>Checked/No Problem Title Found</i>
<i>Not Actual Mileage Title</i>	<i>Checked/No Problem Title Found</i>

**No salvage auction, crash test vehicle, fire damage, police accident, airbag deployment, or damage disclosure records are reported.*

****LEASE AND FLEET REGISTRATION REPORTED**

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PEB4-878 C 343B

ODOMETER ROLLBACK CHECK:

The VIN submitted for this 2000 Ford F150 was checked to determine if any reported odometer reading is less than a previous reading.
No odometer rollback detected.

VEHICLE HISTORY DETAILS:

<i>Date Reported</i>	<i>Odometer Reading</i>	<i>Information Source</i>	<i>General Comments</i>
11/22/1999		NICB	Vehicle mfg. and shipped to original dealer
02/01/2000		Pennsylvania Motor Vehicle Dept. Erwinne, PA	Registered as corporate lease vehicle
03/01/2000	12	Pennsylvania Motor Vehicle Dept. Erwinne, PA	Title or registration issued First owner reported Registered as lease vehicle
11/03/2000	14,045	Pennsylvania Inspection Station	Passed emissions inspection
03/19/2003	44,972	Pennsylvania Motor Vehicle Dept. Bath, PA	Title issued New owner reported

Additionally, a computerized search was conducted on any or all recalls or service bulletins relative to this vehicle and none were found that would apply to this incident.

At the conclusion of this examination, it is my professional opinion, asserted with a reasonable degree of certainty, relying on this investigator's training and experience, this loss is a result of a fuel leak in or near the throttle body or fuel rails.

Further examination revealed severe metallic melt was limited to the top of the engine, the area of the throttle body and fuel rails.

Photographs 21 & 22 reveal the battery and main power distribution box. The total destruction in this area eliminated any chance of a complete examination of the fuses to detect an electrical malfunction.

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FE04-078 C 3448

Photograph 23 reveals the front of the engine, belts, and other combustible components were consumed, and severe metallic melt is evident in this area.

Photograph 24 reveals the total consumption of the combustible components and the metallic melt, along with the total consumption of the throttle body and air intake induction system.

Photograph 25 reveals the lower front portion of the engine and indicates the lower radiator hose is still intact, although damaged as a result of the fire.

The flame front traveled through the engine compartment igniting other combustible components in its path. The path of the fire then traveled to the firewall and the windshield sustained direct flame impingement, causing it to fail and allowed the fire to enter the dash area of the passenger compartment.

The final conclusion is that fuel leaked from the fuel rail and/or throttle body onto adjacent engine components that were hot enough to ignite the leaking fuel.

Photographs were taken of the vehicle during this examination, and will be made a permanent part of this report.

Casualty Consultants, Inc., reserves the absolute right to re-evaluate part or all of this opinioned report, should any new evidence be uncovered which may either prove, disprove, or have any relationship to any theories/opinions developed during this investigation, or any subsequent investigation.

Please do not hesitate to contact me in the event you may have any questions or comments regarding these findings and/or this report.

Respectfully submitted,

Casualty Consultants, Inc.

Larry C. Whiskeyman
Larry C. Whiskeyman
Vehicle Examinations Consultant

LCW/kt

Reviewed for content and clarity by:

John R. Bainbridge
John R. Bainbridge
President

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JUL 14 2004

Southwest Mail & File

PE24-878 C 3441

INSURANCE FRAUD WARNING

Any person who knowingly and with intent to defraud any insurance company or other person files an application for insurance or statement of claim containing any materially false information or conceals, for the purpose of misleading, information concerning any fact material thereto commits a fraudulent insurance act, which is a crime and subjects such person to criminal and civil penalties.

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PHOTOGRAPHS

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FD-36 (Rev. 5-22-64)

PHOTOGRAPH IDENTIFICATION

During the course of this investigation, it was necessary to take a series of photographs to document the vehicle involved in this loss.

These photographs will be made a permanent part of this report for future reference.

All photographs were taken using a 35 MM Pentax Super Program Camera using 35 MM 400 ASA Kodacolor Gold color negative film.

All negatives associated with this case will be maintained in this file by Casualty Consultants, Inc., for future reference and/or reproduction for court room presentation.

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PHOTOGRAPHS 1 - 4: These photographs are separate and distinct views of the exterior of the vehicle. Note the fire is confined to the front end, mirrors, and windshield.

PHOTOGRAPHS 5 - 9: These photographs are separate and distinct views of the interior of the vehicle. Note the fire damage is confined to the dash and windshield. There is smoke damage throughout the vehicle.

PHOTOGRAPH 10: This photograph reveals the PA inspection certificate displayed on the lower left corner of the windshield, expiring 1/05.

PHOTOGRAPH 11: This photograph reveals the VIN plate display on the dash. The VIN was verified.

PHOTOGRAPH 12: This photograph reveals the engine oil dipstick. The oil was clean, but the fluid level was overfilled.

PHOTOGRAPH 13: This photograph reveals the automatic transmission dipstick. The fluid was clean, and the fluid level was full.

PHOTOGRAPH 14: This photograph reveals instrument cluster. The heat distortion eliminated the mileage reading on the odometer. There was no air bag deployment.

PHOTOGRAPH 15: This photograph reveals the center area of the dash. Note the radio/compact disk player, and controls are undamaged.

PHOTOGRAPH 16: This photograph reveals the right side of the dash. Note the glove compartment is closed. No air bag deployment.

PHOTOGRAPH 17: This photograph reveals the VIN label displayed on the left rear entry door, manufactured 11/99, made in the USA.

PHOTOGRAPH 18: This photograph reveals the remains of the aluminum hood, as found at the time of this examination.

PHOTOGRAPH 19: This photograph reveals the windshield and dash area damaged by direct flame impingement.

PHOTOGRAPH 20: This photograph reveals the engine compartment. The total burn and metallic melt indicates this was a fuel fed fire.

PHOTOGRAPH 21: This photograph reveals the battery. The remains indicate the battery was in place and connected at the time of the fire.

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Restoration: Scan & File

PHOTOGRAPH 22: This photograph reveals the main power distribution box. The total burn eliminates any chance of an electrical examination.

PHOTOGRAPH 23: This photograph reveals the front of the engine. All combustible components are consumed and some metallic melt is evident.

PHOTOGRAPH 24: This photograph reveals the top of the engine. Note the throttle body and air intake are totally consumed, which is consistent with a fuel fed fire.

PHOTOGRAPH 25: This photograph reveals the underside of the engine. Note the radiator hoses are damaged, but intact, reinforcing the fire was in the fuel supply area.

PHOTOGRAPH 26: This photograph reveals the radiator and air conditioning condenser. Note this area is heavily damaged as a result of the fuel fed fire in close proximity behind these units.

PHOTOGRAPHS 27 - 28: These photographs reveal the remains of the front and backside of the air conditioning condenser. Note this unit is heavily damaged by intense heat.

PHOTOGRAPHS 29 - 32: These photographs reveal the left front, left rear, right rear, and right front wheels and tires. Note the left front tire is the only tire that was fire damaged. All other tires were inflated and intact.

PHOTOGRAPH 33: This photograph reveals the left frame rail. Note the heavy oxidation indicates extreme heat.

PHOTOGRAPH 34: This photograph reveals the front drive train from the back to the front. Note the oily residue on the cross brace.

PHOTOGRAPH 35: This photograph reveals the front drive train from the front to the back. Note the oily residue on the cross brace.

PHOTOGRAPH 36: This photograph reveals the engine oil crankcase. Note the leak at the drain plug.

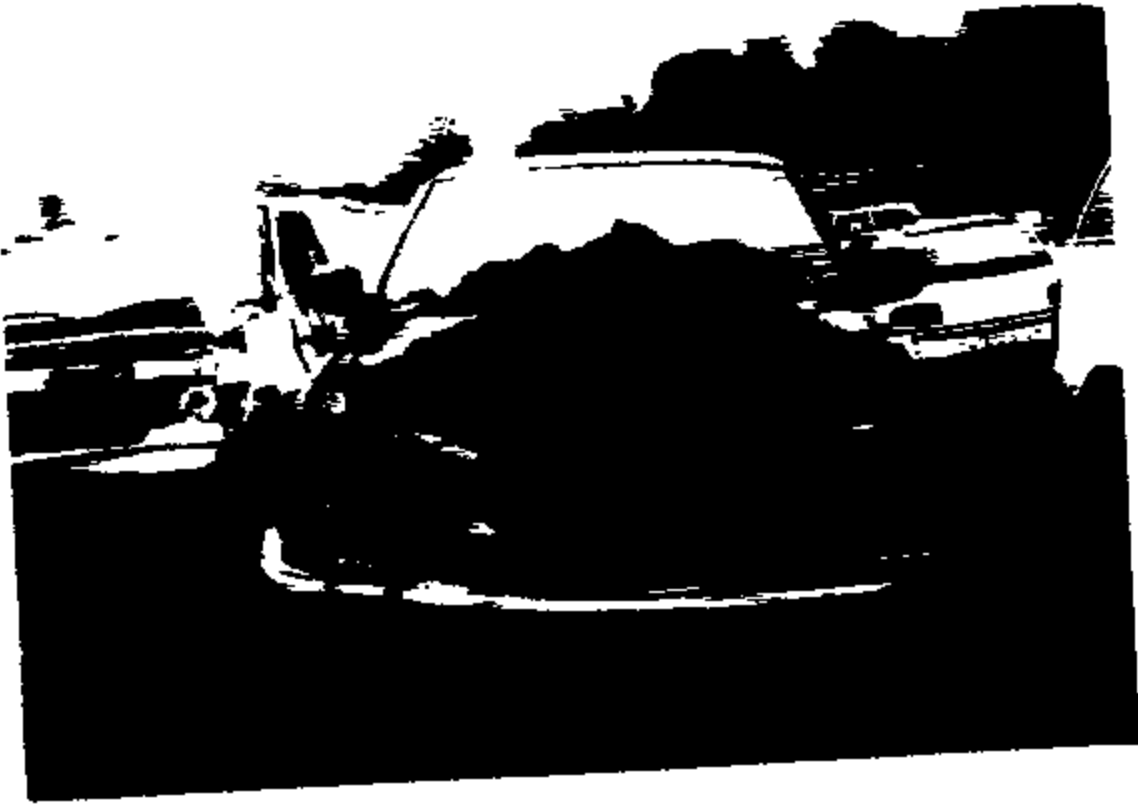
PHOTOGRAPH 37: This photograph reveals the inspection report book (Penske) retrieved from the left rear floor.

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BENJAMIN MAIL & FREIGHT

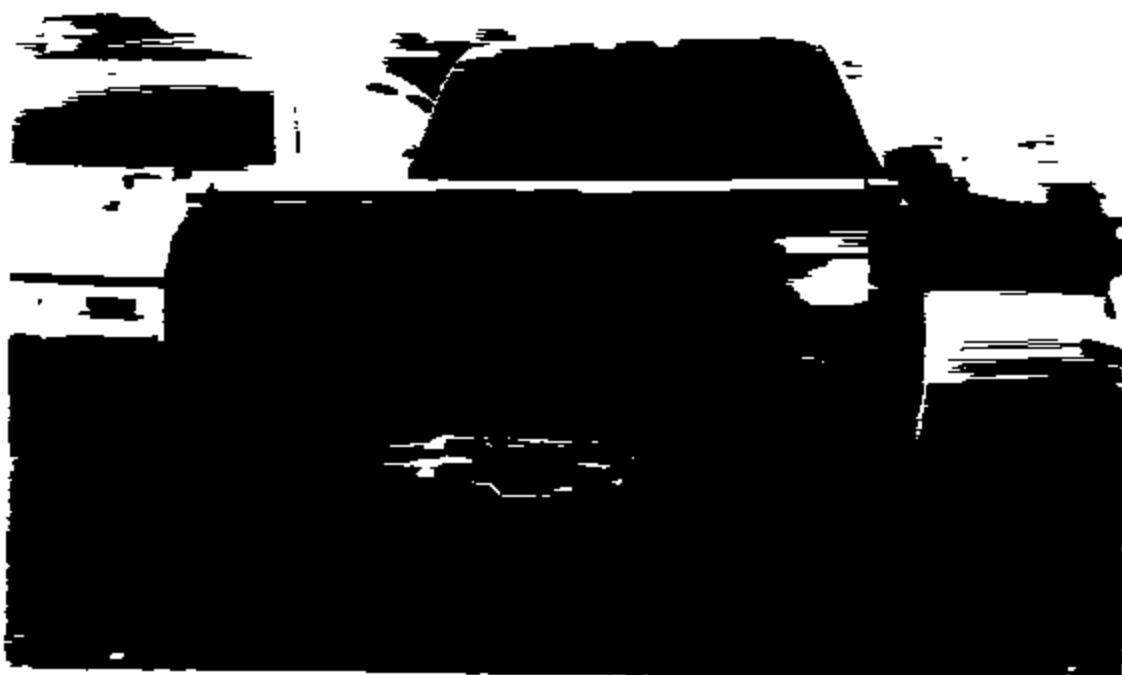
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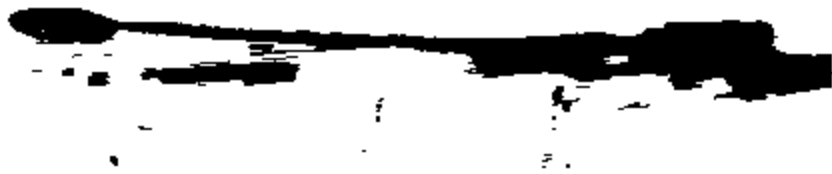
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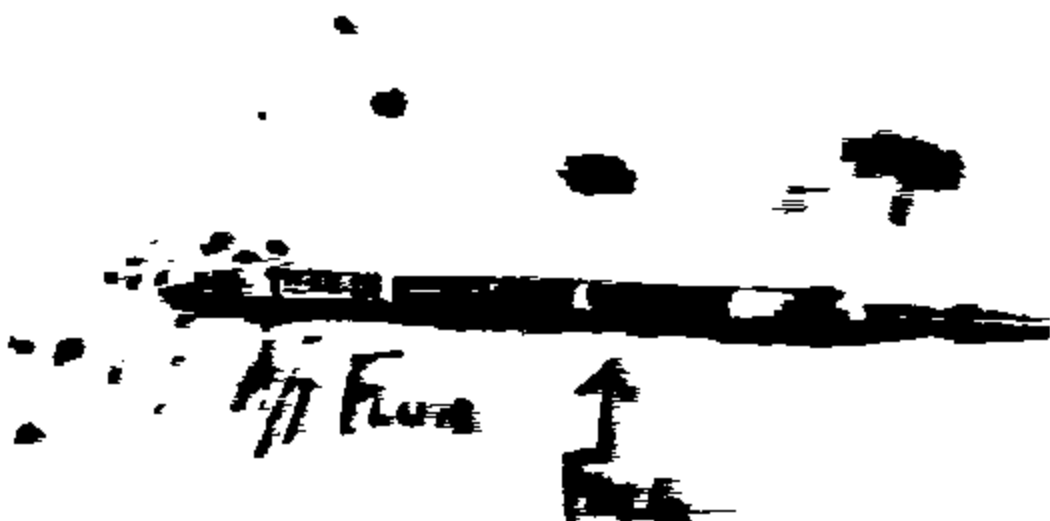
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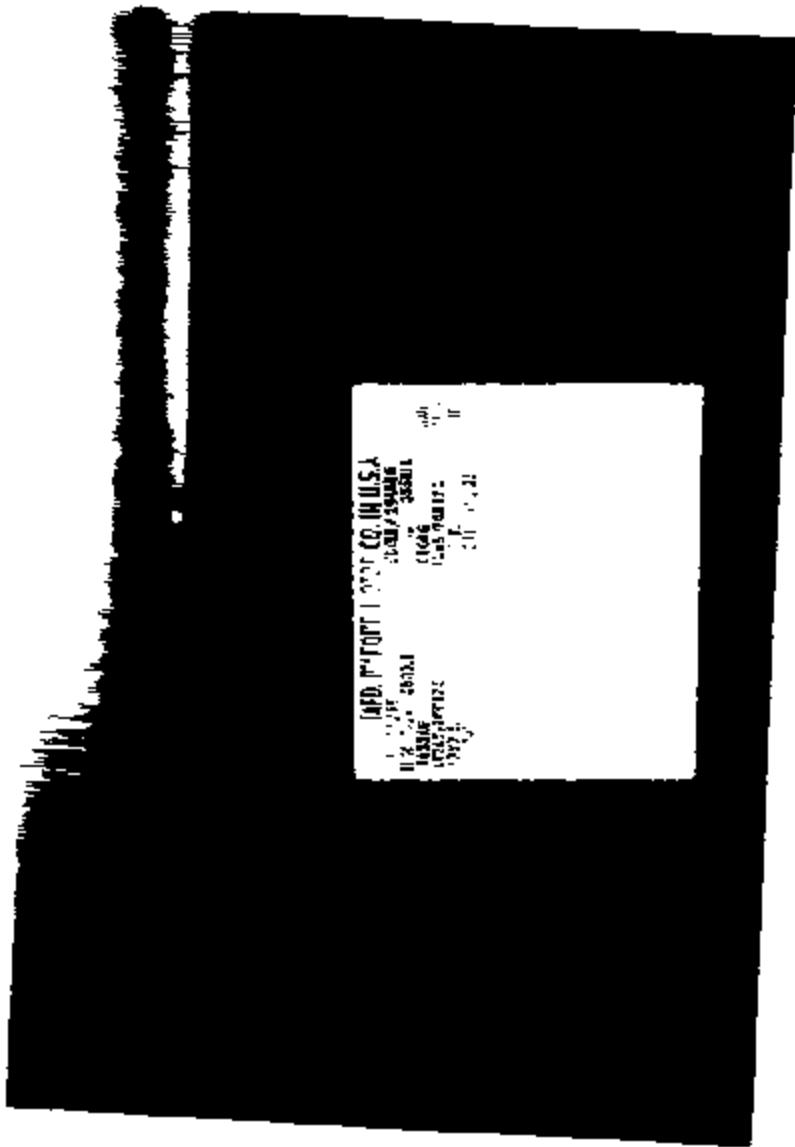
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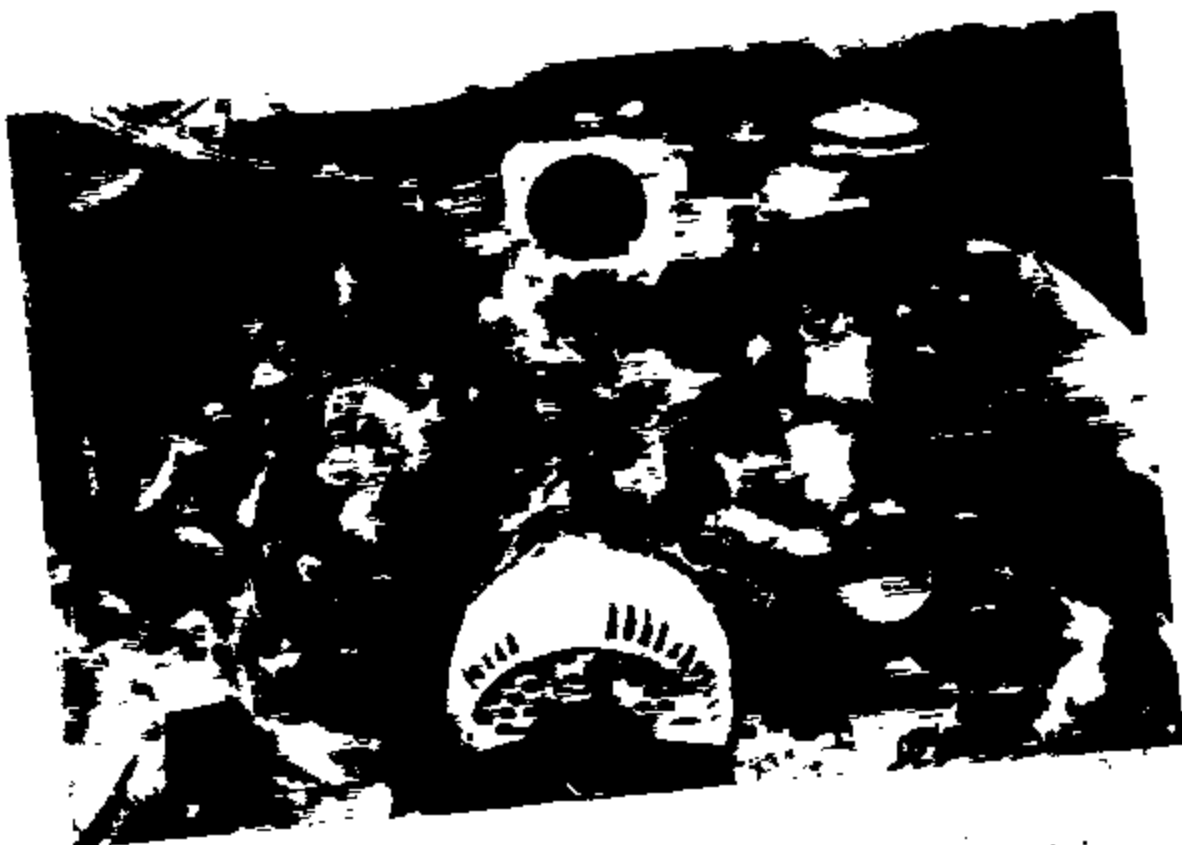
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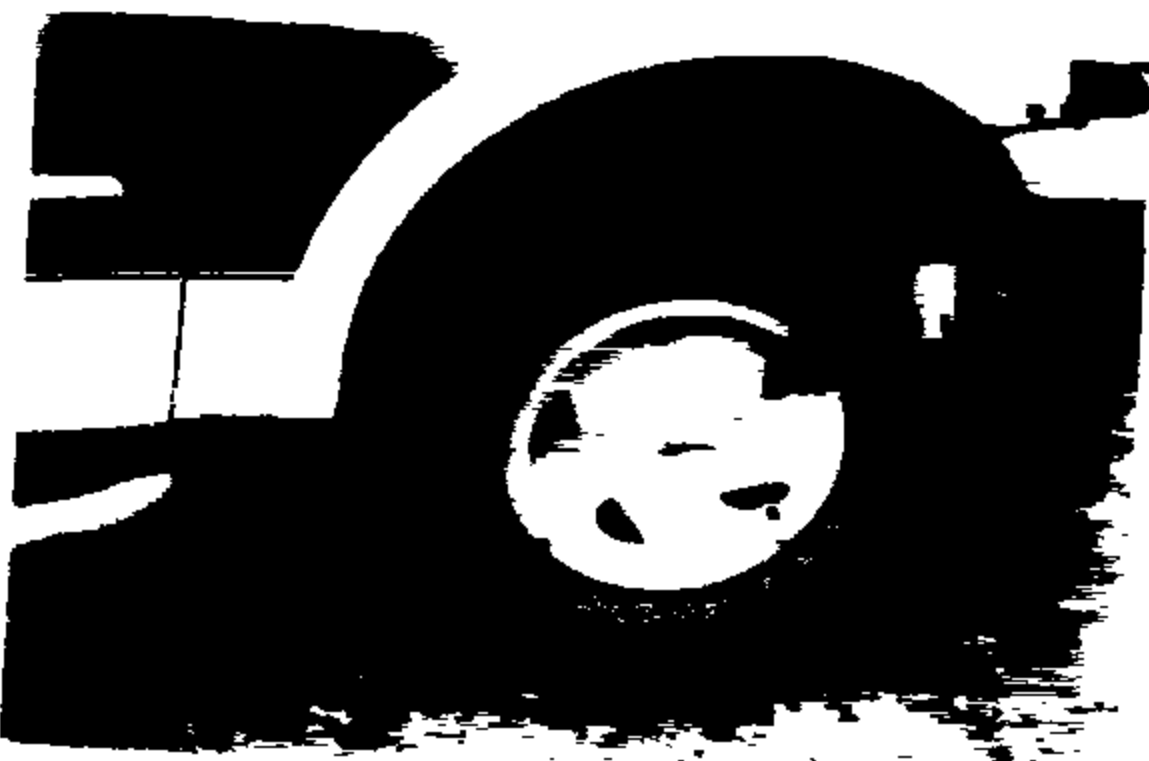


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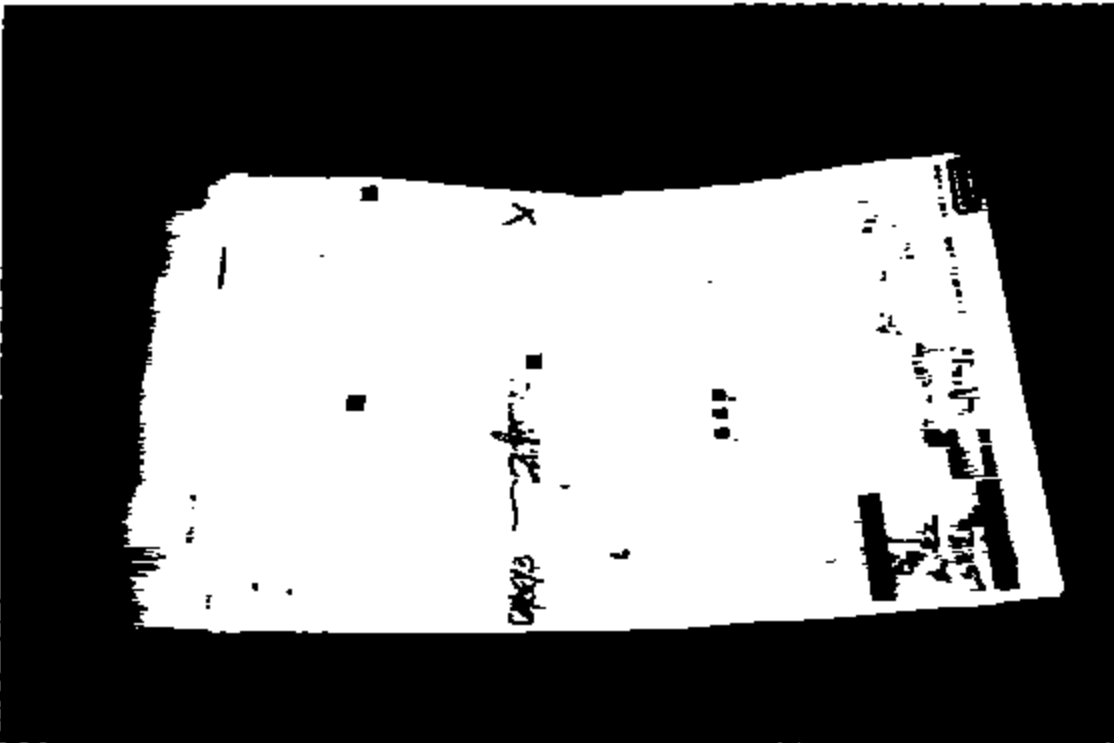


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APPENDAGE "A"

A copy of the recalls and service bulletins is attached for your review.

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FEB-078 C 3487

Automotive Recalls and Technical Service Bulletins for 2000 Ford Truck F 150 4WD Pickup V8-330 5.4L SOHC VIN L EFI.

Provided by ALldata



[Click Here For Full Technical Service Bulletins, Recall Information & More](#)

Bulletins for 2000 Ford Truck F 150 4WD Pickup V8-330 5.4L SOHC VIN L EFI

Safety Recalls

TSB Number	Issue Date	TSB Title
1. 01S24	NOV 01	Recall - Defective Wiper Motor Switch/Gear Cover
2. 00S21	OCT 00	Recall - Seat Belt Buckle Inspection/Replacement

Emissions Recalls

TSB Number	Issue Date	TSB Title
1. 01E16	DEC 01	Recall - Oxygen Sensor Inspection/Replacement

General Recalls

TSB Number	Issue Date	TSB Title
1. 01B83	OCT 01	Campaign - Cooling System, Sales Literature Error
2. 99B19	AUG 99	Campaign - Headlamp Switch Replacement

Service Bulletins

TSB Number	Issue Date	TSB Title
1. 03-15-13	AUG 03	Steering - Tie Rod End Inspection Procedures
2. 03-14-8	JUL 03	A/T - Cooler Flushing Service Tips
3. 03-14-4	JUL 03	Ignition System - Engine Misfire Diagnostic Tips
4. 03-11-6	JUN 03	Electrical - Wiring Soldering/Crimping Tips
5. 03-9-8	MAY 03	Emissions - MIL ON/EVAP System DTC's Set
6. 03-6-2	MAR 03	Engine - Oil Leak From R/R Cylinder Head Gasket
7. 03-6-6	MAR 03	Engine Controls - Bi-Fuel O2 Sensor Diagnostics
8. 03-2-4	FEB 03	Body - Driver Side Window Hinds When Operated
9. 02-23-4	NOV 02	Engine Controls - DTC P1635 Set After PCM/IC Repla
10. 02-22-1	NOV 02	Engine Controls - Engine Surges/Rolling Idle/DTC's
11. 02-21-1	OCT 02	A/T - Torque Converter Access Plug Dislodges
12. 02-21-4	OCT 02	Body - Roof Ditch Material Cracking
13. 02-21-13	OCT 02	Engine - Cylinder Head Straightedge Surface Check
14. 02-20-8	OCT 02	A/C System - Diagnosis and Service Tips
15. 02-17-6	SEP 02	A/T - Inadvertent Shift Interlock Disabling
16. 02-16-4	AUG 02	Audio System - Whining/Buzzing Noise From Speakers
17. 02-12-1	JUN 02	A/C - White Flakes Coming From Vents
18. 02-12-3	JUN 02	Engine - Lacks RECEIVED Temperatures
19. 02-11-4	JUN 02	Aluminum Engine RECEIVED Service Tips
20. 02-10-8	MAY 02	Fuel System - Whistling Noise
21. 02-3-5	FEB 02	Tailgate - Squeaking/Binding Condition

JUL 14 2004

22.	02-4-5	FEB 02	Battery - Charging Tips and Guidelines
23.	02-4-1	FEB 02	Idle Arm - Replacement Specifications
24.	02-2-3	FEB 02	Engine - Aluminum Block/Head Machining
25.	02-1-4	JAN 02	Engine Head Gasket - Approved Replacement Procedures
26.	02-1-9	JAN 02	Engine Oil - Oil Recommendations/Applications
27.	02-1-6	JAN 02	Wheels/Tires - Road Force Measurement Equipment
28.	01-25-5	DEC 01	Brakes - Reduced Power Assist in Freezing Temperat
29.	01-24-6	DEC 01	Engine - Oil System Priming Procedures
30.	01-23-6	NOV 01	Engine Coolant - Propylene Glycol Recommendations
31.	01-21-4	OCT 01	Bi-Fuel - Lock Off Solenoid/Tank Valve Coil Resist
32.	01-21-5	OCT 01	Engine - High Idle/Sticking Throttle
33.	01-21-6	OCT 01	Head Lamp Switch - Revised
34.	01-21-8	OCT 01	Starting System - No Crank/No Start Condition
35.	01-20-5	OCT 01	Driveability - Vacuum Leak Detection
36.	01-19-4	OCT 01	Head Lamp Switch - Updated Replacement Part
37.	01-19-2	OCT 01	Rear Brakes - Grabbing On First Few Applications
38.	01-18-2	SEP 01	Outer Door Panel - Cracking
39.	01-15-7	AGG 01	A/T - Fluid Application Charts
40.	01-15-6	AGG 01	Heater Core - Repeated Failures
41.	01-14-1	JUL 01	Transfer Case - Inadvertent Shifts
42.	01-13-7	JUL 01	A/T - 4R70W Clunk Noise on 2nd to 1st Gear Downshi
43.	01-11-12	JUN 01	Tail Lamp - Moisture/Dirt Inside Lens
44.	01-10-11	MAY 01	Bi Fuel System - Component Identification
45.	01-10-6	MAY 01	Bi-Fuel System - Compuvalve Replacement
46.	01-10-1	MAY 01	Parameter Identification Data Input and Output
47.	01-10-12	MAY 01	Wire Harness - Terminal Repair Kit
48.	01-9-8	MAY 01	Door/Tailgate - Corrosion
49.	01-9-7	MAY 01	Emissions/Engine Controls - Driveability Diagnosis
50.	01-7-3	APR 01	Fuel Pump - Whine Heard Through Radio Speakers
51.	01-6-2	APR 01	FATS System - Diagnostic Service Tips
52.	01-5-8	MAR 01	A/T - 4R70W Ticking Noise In 1ST Gear
53.	01-4-2	MAR 01	Oil Pressure Sending Unit - Drip Shield Interferen
54.	01-2-5	FEB 01	Seat Belts - Warning System Operation
55.	01-1-6	JAN 01	PCM - MIL ON, DTC's P0350/P0360 Set
56.	00-26-1	DEC 00	Engine - Rough Idle/Noise When Cold
57.	00-23-10	NOV 00	A/T - In Line Fluid Filter Kit
58.	00-23-8	NOV 00	Starter Solenoid - No Crank/No Start Condition
59.	00-19-2	SEP 00	Battery Saver Relay - Malfunction
60.	00-18-3	SEP 00	Cooling System - Intake Manifold Gasket Leak
61.	00-14-2	JUL 00	Speedometer Defective,, 4X4 Lamp ON, DTCs P1635/P1
62.	00-9-1	MAY 00	A/T Cooler - Fluid Leaks at Radiator
63.	00-9-5	MAY 00	Inner Fender Well - Rear Fender Well Dented/Dinged
64.	00-9-6	MAY 00	Windshield Wipers - Operate While Switch is OFF
65.	00-8-4	APR 00	Differential - Chattering On Turns
66.	00-3-8	FEB 00	A/T - E40D/4R100 Fluid In-Line Filter Kit
67.	99-26-9	DEC 99	Fuel Economy - Customer Expectation vs. Vehicle Us
68.	99-26-3	DEC 99	Wheel Nut and Stud Size -Revised Size
69.	99-25-6	DEC 99	Brake Rotor - Incorrect Discard Thickness Specific
70.	99-24-2	NOV 99	Locks - Lock Service Packages Available
71.	99-23-4	NOV 99	EVAP - DTC's P0442/P0455/MIL ON/No Driveability Co
72.	99-22-2	NOV 99	Wire Harness - Terminal Repair Kit/Wire Splice Pro
73.	99-21-11	OCT 99	A/T - 4R100 Orange Service Tag Service Procedure
74.	99-19-6	SEP 99	A/C - Identification of Non Approved Refrigerants
75.	99-14-12	JUL 99	A/T - 4R70W Green Service Tag Service procedure

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[Select a different engine | Select a different model | Select a different make | Select a different year]

JUL 14 2004

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Office of Defects Investigation

Recalls - Search Results

Recall Date : August 3, 2001
 TYPE : VEHICLE
 BUILD DATES : Information Not Available
 MAKE : FORD
 MODEL : F150

Make : FORD Model : F150 Year : 2000
 NHTSA CAMPAIGN ID Number : 01V258000 Recall Date : AUG 03, 2001
 Component: VISIBILITY:WINDSHIELD WIPER/WASHER:MOTOR
 Potential Number Of Units Affected : 1083000

Summary:

VEHICLE DESCRIPTION: PASSENGER CARS, SPORT UTILITY VEHICLES, AND LIGHT AND MEDIUM DUTY PICKUP TRUCKS. A SWITCH LOCATED IN THE PLASTIC COVER OF THE WIPER MOTOR GEAR CASE COULD MALFUNCTION AND OVERHEAT, POTENTIALLY RESULTING IN LOSS OF INTERMITTENT WIPER FUNCTION, LOSS OF WIPER PARK FUNCTION, COMPLETE LOSS OF WIPER FUNCTION, OR IGNITION OF THE PLASTIC COVER MATERIAL. SWITCH MALFUNCTION IS MOST LIKELY TO OCCUR WHEN THE INTERMITTENT SETTING OF THE WIPERS IS BEING USED, OR WHEN SNOW OR ICE OBSTRUCTS THE BLADES FROM RETURNING TO THE "PARKED" POSITION AT THE BOTTOM OF THE WINDSHIELD. THESE VEHICLES WERE BUILT AT THE FOLLOWING ASSEMBLY PLANTS: ATLANTA PLANT FROM 2/11/00 THROUGH 7/31/00; CHICAGO PLANT FROM 2/14/00 THROUGH 8/4/00; KANSAS CITY PLANT FROM 2/26/00 TO 9/4/00; KENTUCKY TRUCK PLANT FROM 2/18/00 TO 8/31/00; MICHIGAN TRUCK PLANT FROM 2/23/00 THROUGH 8/3/00; NORFOLK PLANT FROM 2/21/00 THROUGH 7/27/00; WAYNE STAMPING AND ASSEMBLY PLANT FROM 2/25/00 THROUGH 8/15/00; AND WIXOM PLANT FROM 2/15/00 THROUGH 8/8/00.

Consequence:

LOSS OF VISIBILITY WHILE DRIVING INCREASES THE RISK OF A CRASH.

Remedy:

DEALERS WILL INSPECT THE DATE CODE ON THE WIPER MOTOR. MOTORS BUILT WITH THE SUSPECT TIME FRAME WILL HAVE THE WIPER MOTOR GEAR CASE COVER REPLACED. OWNER NOTIFICATION BEGAN AUGUST 20, 2001. OWNERS WHO TAKE THEIR VEHICLES TO AN AUTHORIZED DEALER ON AN AGREED UPON SERVICE DATE AND DO NOT RECEIVE THE FREE REMEDY WITHIN A REASONABLE TIME SHOULD CONTACT FORD AT 1-866-436-7332.

Notes:

ALSO CONTACT THE NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION'S AUTO SAFETY HOTLINE AT 1-888-DASH-2-DOT (1-888-327-4236).

Make : FORD Model : F150
 NHTSA CAMPAIGN ID Number : 00V284000
 Component: EQUIPMENT:OTHER:LABELS
 Potential Number Of Units Affected : 4500

Year : 2000
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Summary:

VEHICLE DESCRIPTION: BI-FUEL CNG PICKUP TRUCKS AND BI-FUEL CNG VANS, MODIFIED BY CFI CONTROL SYSTEMS, INC., FAIL TO CONFORM TO THE REQUIREMENTS OF FMVSS NO. 303, "FUEL SYSTEM INTEGRITY OF COMPRESSED NATURAL GAS VEHICLES." THE LABEL AFFIXED TO THE FUEL FILLER DOOR BY THE VEHICLE MODIFIER CONTAINS THE INSPECTION DATE AND EXPIRATION DATE OF THE CNG TANK. HOWEVER, IT DOES NOT CONTAIN THE STATEMENT "SEE INSTRUCTIONS ON THE FUEL CONTAINER FOR INSPECTION AND SERVICE LIFE."

Consequence:

THESE VEHICLES DO NOT COMPLY WITH THE REQUIREMENTS.

Remedy:

OWNERS WILL BE PROVIDED A LABEL WITH THE REQUIRED STATEMENT, ALONG WITH INSTRUCTIONS FOR AFFIXING THE LABEL AT THE FUEL FILLER DOOR. OWNER NOTIFICATION BEGAN NOVEMBER 2, 2000. OWNERS WHO TAKE THEIR VEHICLES TO AN AUTHORIZED DEALER ON AN AGREED UPON SERVICE DATE AND DO NOT RECEIVE THE FREE REMEDY WITHIN A REASONABLE TIME SHOULD CONTACT FORD AT 1-800-392-3673.

Notes:

ALSO CONTACT THE NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION'S AUTO SAFETY HOTLINE AT 1-888-DASH-2-DOT (1-888-327-4236).

Make : FORD

Model : F150

Year : 2000

NHTSA CAMPAIGN ID Number : 00V228001

Recall Date : AUG 11, 2000

Component: SEAT BELTS:FRONT:BUCKLE ASSEMBLY

Potential Number Of Units Affected : 144435

Summary:

VEHICLE DESCRIPTION: PASSENGER VEHICLES, LIGHT DUTY TRUCKS, SPORT UTILITY VEHICLES, AND MINI VANS EQUIPPED WITH TRW SEAT BELT BUCKLE ASSEMBLIES. THE BUCKLE BASE OF THESE SEAT BELT ASSEMBLIES WERE NOT PROPERLY HEAT TREATED AND THEREFORE DO NOT PASS THE LOAD BEARING REQUIREMENT OF FEDERAL MOTOR VEHICLE SAFETY STANDARD NO. 209, "SEAT BELT ASSEMBLIES."

Consequence:

IN THE EVENT OF A VEHICLE CRASH, THE OCCUPANT MAY NOT BE PROPERLY RESTRAINED.

Remedy:

DEALERS WILL INSPECT THE DATE CODE ON CERTAIN SEAT BELT BUCKLES OF YOUR VEHICLE AND REPLACE ALL SEAT BELT BUCKLES THAT FALL WITHIN THE SUSPECT DATE CODE RANGE. OWNER NOTIFICATION BEGAN OCTOBER 26, 2000. OWNERS WHO TAKE THEIR VEHICLES TO AN AUTHORIZED DEALER ON AN AGREED UPON SERVICE DATE AND DO NOT RECEIVE THE FREE REMEDY WITHIN A REASONABLE TIME SHOULD CONTACT FORD AT 1-800-392-3673.

Notes:

ALSO CONTACT THE NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION'S AUTO SAFETY HOTLINE AT 1-888-DASH-2-DOT (1-888-327-4236).

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<http://www-odi.nhtsa.dot.gov/cars/problems/recalls/recallresults.cfm?start=1&SearchType...> 6/11/2004

REC-078 C 3471

CURRICULA VITAE

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PER4-078 C 3472

178

[REDACTED]

Vehicle Fire & Examination Consultant

Owned and operated [REDACTED] for 40 (+) years and recently retired in June 2001.

Licensed by Commonwealth of Pennsylvania as an Insurance Department Motor Vehicle Physical Damage Appraiser – License number [REDACTED]

Instructor – United States Coast Guard Auxiliary/Pennsylvania Fish and Boat Commission.

Completed 42 years in the volunteer fire service.

MEMBERSHIP IN THE FOLLOWING ASSOCIATIONS:

- United States Coast Guard Auxiliary
- Keystone State Fire Chiefs Association
- Berks County Firemen's Association
- Berks County Fire Chiefs Association
- International Assoc. of Auto Theft Investigators
- Pennsylvania Arson Investigators Assoc.
- International Arson Investigators Assoc.

ATTENDED NUMEROUS COURSES UNDER THE DIRECTION OF:

- Pennsylvania State Police Fire Marshal Division
- Pennsylvania Association of Arson Investigators
- Pennsylvania State Fire Academy
- Pennsylvania and Berks County Emergency Management
- Penn State University – University Hospital
- Reading Area Community College
- Commonwealth of Pennsylvania – Department of Community Affairs
- Berks County Firemen's Association

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RECEIVED TRAINING IN THE FOLLOWING COURSES:

- **Administration Course in Fire Training – September 24, 25, 28, 1971**
- **Advanced First Aid and Rescue – January/February 1975**
- **Mail Fire Workshop – 14.0 hour course – February 1978**
- **Fire Training in Respiratory Protection Devices, Ladders, Hose Loads, Lays & Appliances, Forcible Entry, Salvage, Ventilation, Ropes, Knots, Hitches, Rescues, Fire Ground Tactics, Flammable Liquids, Auto Extrication, Fire Fighting Simulator, Pump I and Pump II – March 20-21, 1982**
- **Financing Fire Protection Services – Commonwealth of Pennsylvania Department of Community Affairs – September 14, 1983**
- **Fire/Arson Detection – 16.0 hour course – February 15-16, 1986**
- **Fundamentals Burn Session – 16.0 hour course – September 20-21, 1986**
- **Aeromedical Safety Zone Training for Life Lion – 2.0 hour course – January 30, 1988**
- **Fire Officers – 16.0 hour course – February 20-21, 1988**
- **Hazardous Materials Awareness (NFA) (R&I) – 4.0 hour course – March 17, 1991**
- **Hazardous Materials for First Responders – L.A.F.F. – 24.0 hour course – April 16, 1991**
- **Introduction to Safety and the Training System (IST) – 6.5 hour course – March 24, 1991; March 31, 1991**
- **Operations Level Annual Refresher Training – 5.5 hour course December 8, 1992; December 15, 1992**
- **Fire Scene Examination and Protection – 14.0 hours – April 25, 1993**
- **Operations Level Annual Refresher Training – 5.5 hour course December 13, 1994; December 20, 1994**
- **Operations Level Annual Refresher Training – 5.5 hour course October 24, 1995; October 31, 1995**
- **Radiological Monitoring I & II – Radiological Emergency Response Training – March 19, 1996**
- **Foam Fire Fighting Workshop – March 30, 1996**
- **Operations Level Annual Refresher – 5.5 hour course January 9, 1999**
- **Arson Awareness for Emergency Response Personnel – 4.0 hour course – February 1, 1999**

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- **Operations Level Annual Refresher – 5.5 hour course – March 9, 2002**
- **Crime Scene Training – 24.0 hour course – March 18-20, 2003.**
- **Haz-Mat Awareness Refresher – 1.5 hr. – April 23, 2003.**
- **Crime Scene Preservation – Public Agency Training Council – April 2003.**
- **Operations Level Annual Refresher Training – 5.5 hour course March 29, 2004.**

FIRE FIGHTING BACKGROUND:

- **Junior Member Keystone Fire Company of Shillington (1960-1963)**
- **Member Keystone Fire Company of Shillington**
Apparatus Driver (1963)
Lieutenant (1965-1970)
Second Assistant Chief (1971-1973)
First Assistant Chief (1974-1990)
Fire Chief (1990-1996)
- **Borough of Shillington Fire Marshal (1990-1996)**
- **Berks County Fire Training School Instructor (1965-1987)**

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State Farm Insurance Companies®



June 11, 2004

Bethlehem Service Center
248 Broadhead Rd.
PO Box 28017
Lehigh Valley, PA 18008-9731

FORD MOTOR COMPANY
PARKLANE TOWERS W STE 400
3 PARKLANE BLVD
DEARBORNE MI 48126-2568



RE: Claim Number: [REDACTED]
Our insured: [REDACTED]
Date of Loss: May 22, 2004
Make, Model and Year of Product: 2000 Ford F150 Pickup
VIN: 1FTRX18L3YF [REDACTED]

Dear Sirs:

The identified vehicle is insured by State Farm Mutual Automobile Insurance Company. This vehicle experienced a fire in the engine compartment.

State Farm® would like to give you the opportunity to inspect the vehicle and give you advance notice of our potential subrogation claim.

Please contact me at (810) 317-7547 to set up a time for your inspection.

Sincerely,

Jim Neupauer, CPCU
Claim Representative
(810) 317-7547
State Farm Mutual Automobile Insurance Company

JN662/0811013

- F121
- 5/22/04
- '00 F150
- WSD VIN
- NW - 1/19/00
- ESP