

PE04-078

FORD

1/28/2005

ATTACHMENT F

BOOK 9 OF 12

PART 4 OF 6



FISHER KANARIS, P.C.
ATTORNEYS AT LAW

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(313) 879-1306

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KULIFORD@FISHERKANARIS.COM

November 19, 2004

NOV 19 2004

Via Facsimile, Certified Mail/
Return Receipt & Regular Mail

Dennis E. Ross
Vice President/Gen. Counsel
Ford Motor Company
The American Road
#1205
Dearborn, MI 48126

Ford Motor Company
Consumer Affairs
P.O. Box 6248
MD-3NE-B
Dearborn, MI 48126

CONSUMER AFFAIRS
SECTION
4 NOV 22 P2:31

Re: Hanover re: [REDACTED]
Claim No.: [REDACTED]
D/L: 11/18/04
Our File No.: 04-1710

Dear Mr. Ross:

Please be advised the undersigned law firm has been retained by Hanover Insurance Company in regards to a loss suffered by its insured, [REDACTED]. On November 18, 2004, [REDACTED] suffered the loss of his 1999 Ford Expedition to fire which originated in the engine compartment. Unfortunately, the fire also spread to his residence at [REDACTED] Metairie, LA.

Approximately \$200,000.00 in damages occurred to the home. Hanover Insurance insured this residence and will be seeking recovery from any party that our investigation determines to be potentially responsible.

We request that you contact our office in regards to inspecting the vehicle and the scene of the fire. At present, the scene is being preserved but it is exposed to the elements. Time is of the essence and we look forward to hearing from you shortly.

FISHER KANARIS, P.C.
ATTORNEYS AT LAW

Ford Motor Company
November 19, 2004
Page 2

Any questions or concerns may be addressed by contacting the undersigned.

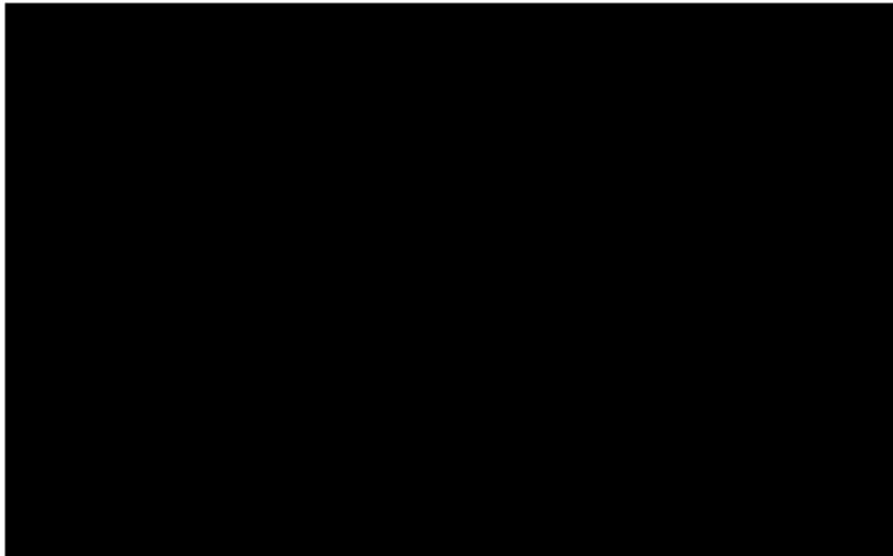
Very truly yours,

FISHER KANARIS, P.C.


Ernest L. Clifford

ELC:cam

E:\04-1710\Letters\Ford.01.wpd



Norton, Shawn (S.L.)

From: Norton, Shawn (S.L.)
Sent: Tuesday, October 26, 2004 12:53 PM
To: 'CHTGT@allstate.com'
Cc: [REDACTED]
Subject: FW: Fire Loss / Allstate Claim# [REDACTED]
Importance: High

This is my final request to you in regards to the loss mentioned below. Ford Motor Company cannot contact you without your contact information. I do not have your phone number, nor do I have your mailing address. Should you wish to persue this claim with Ford Motor Company, please provide the following information:

Your mailing address
Your phone number
The 17 digit vehicle identification number

Thanks,

Ms. Shawn L. Norton
Claims Analyst / Litigation Assistant
OGC - Product Litigation
PTW300
313/322-3269 phone
313/845-4089 fax

-----Original Message-----

From: Norton, Shawn (S.L.)
Sent: Wednesday, October 13, 2004 9:02 AM
To: 'Brown, Andre(SA MCO)'
Cc: Norton, Shawn (S.L.)
Subject: FW: Fire Loss / Allstate Claim# 1763439757
Importance: High

[REDACTED]
You have not responded to my last email... We need your contact information, and the other information I requested in order to set up a claim.

Ms. Shawn L. Norton
Claims Analyst / Litigation Assistant
OGC - Product Litigation

10/26/2004

PE04-078 C 3752

PTW300
313/322-3269 phone
313/845-4089 fax

-----Original Message-----

From: Norton, Shawn (S.L.)
Sent: Friday, October 08, 2004 10:33 AM
To: 'Brown, Andre(SA MCO)'
Cc: Norton, Shawn (S.L.)
Subject: RE: Fire Loss / Allstate Claim# 1763439757

I will have this new loss entered into our system, but I will need you to fax over a letter with your contact information (address, phone number, etc.). Also, do you have the 17 digit vehicle identification number for this vehicle? And, do you have a brief description of the events prior and subsequent to the fire. Had it been parked for quit some time, or was it parked idling?

Thanks,
Ms. Shawn L. Norton
Claims Analyst / Litigation Assistant
OGC - Product Litigation
PTW300

313/322-3269 phone
313/845-4089 fax

-----Original Message-----

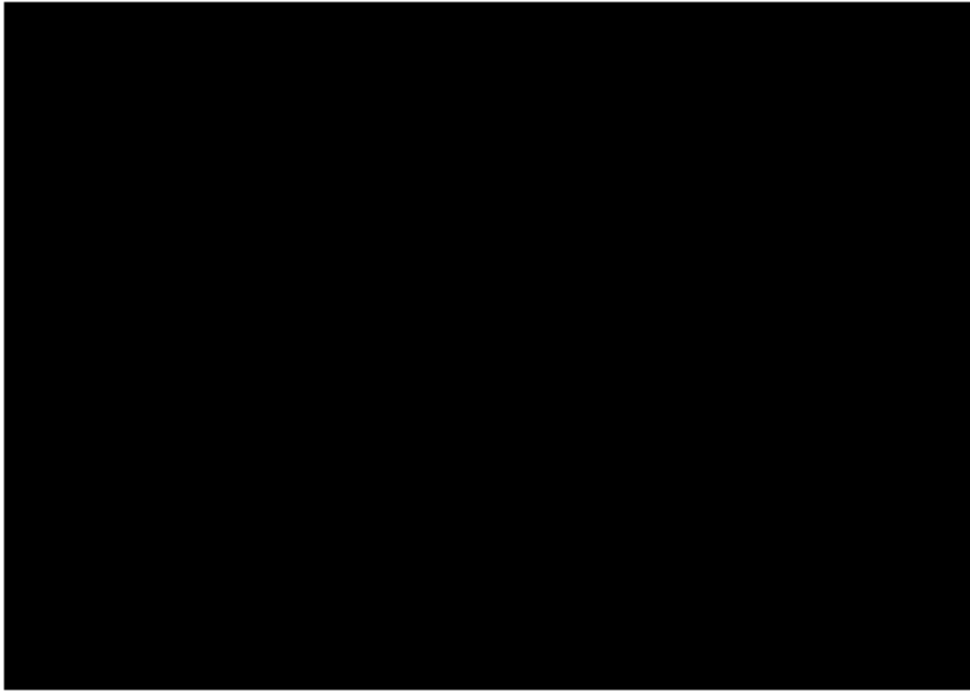
From: Brown, Andre(SA MCO) [mailto:CHTGT@allstate.com]
Sent: Friday, October 08, 2004 9:58 AM
To: Norton, Shawn (S.L.)
Cc: Ladd, Deborah(SAMCO)
Subject: FW: Fire Loss / Allstate Claim# 1763439757

Shawn,
Please be advised we have a fire loss involving a 2001 Ford F150 belonging to Jose Melchor our insured. The truck has been inspected by our Allstate adjuster Alfredo Saenz Jr. The date of loss is October 5, 2004. We were advised by insured a fire started under the hood near his home. The inspection location:

Bert Ogden Motors
4221 S Hwy 281
Edinburg, Tx 78539

If, you need any additional information please advise!

Thanks,



PE04-078 C 3754

RECEIVED NOV 16 2004

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*ERIC T. SWANSON
RONALD D. MONTIETH
CHARLES A. EDGELLER
LESLEY RENFRO WILLSON
LORNA H. HORTON

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BARRY A. GILBERT
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WILLIAM C. ELLIOT
BRIAN D. JENKINS
SARAH A. THOMPSON

OF COUNSEL
THERESA SHEAN HOLT

STATE BAR OF MISSOURI
MEMBER

November 12, 2004

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

5033005

RE: 2000 Ford Expedition
VIN: 1FMPU18L1Y [REDACTED]
DOL: September 18, 2004
Vehicle Owners: [REDACTED]

O

Dear Ms. Norton :

Enclosed, please find the following documents we have obtained in follow up with the Boone County Fire Protection District: The fire scene sketch by Brent Herin, from the Boone County Fire Protection District's Fire Inspection Report; and a CD disc of photographs taken by fire investigator, John Wilke, and referenced in his fire inspection report.

I would anticipate Mr. Helton and Mr. Clarke soon will be generating an agreed protocol for the further testing of the [REDACTED] vehicle. I look forward to discussing with you any areas of concern that may arise regarding that protocol and subsequent testing.

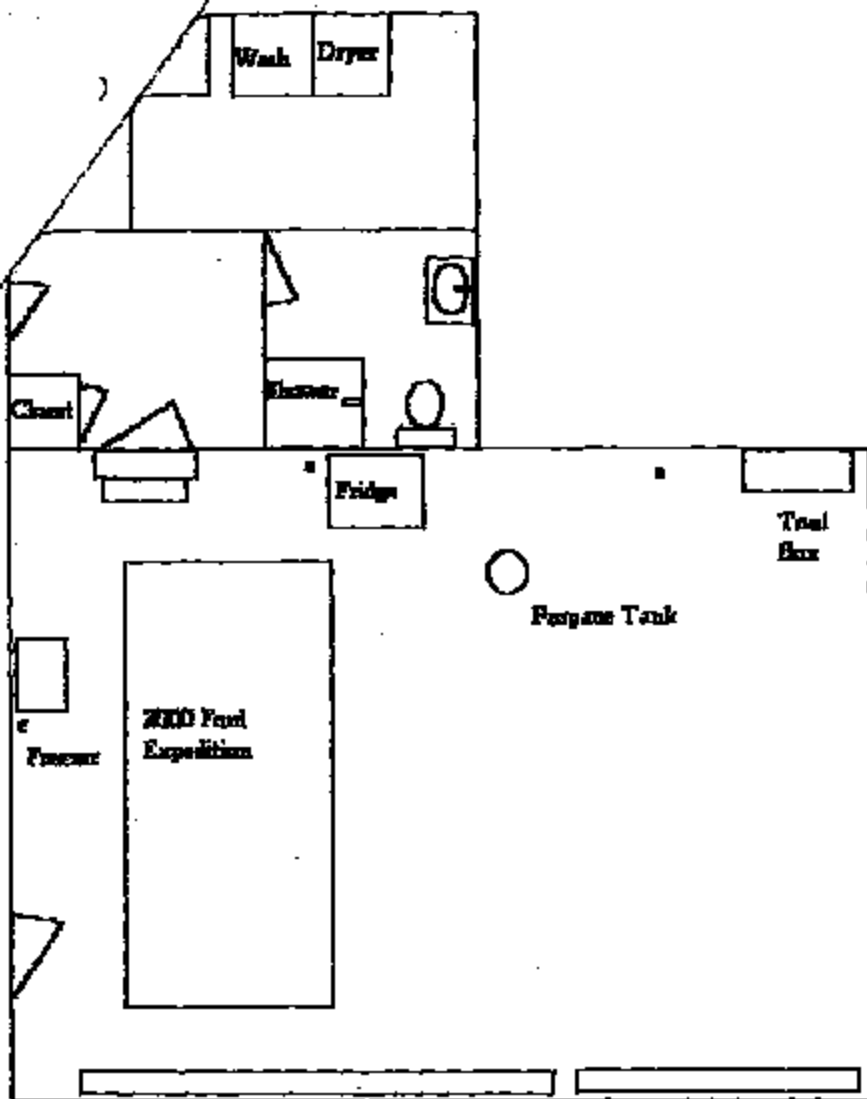
Further, we anticipate providing you a summary of pertinent facts and events bearing on this fire. Also, please confirm that all of the relevant service records for this vehicle are accessible either through the local dealership, Joe Machens Ford in Columbia, Missouri, or if not, that you can provide such.

Thank you for your continued cooperation in this matter. I look forward to hearing from you.

Sincerely

Barry A. Gilbert
(573) 445-8990
BAG/ala/Enclosure

sent
disc
to get
photos
printed
11/18/04



Legend

e: Electrical outlets

Diagram 1
 Case: Mute
 Prepared by:
 Brent Harris
 File Investigator 122

This drawing is not to scale and all items contained here in are subject to interpretation by the

Investigator: *[Faint handwritten text]*

Date: *[Faint handwritten text]*

Case Name

Location: *[Faint handwritten text]*

Film Type

Number of Exposures

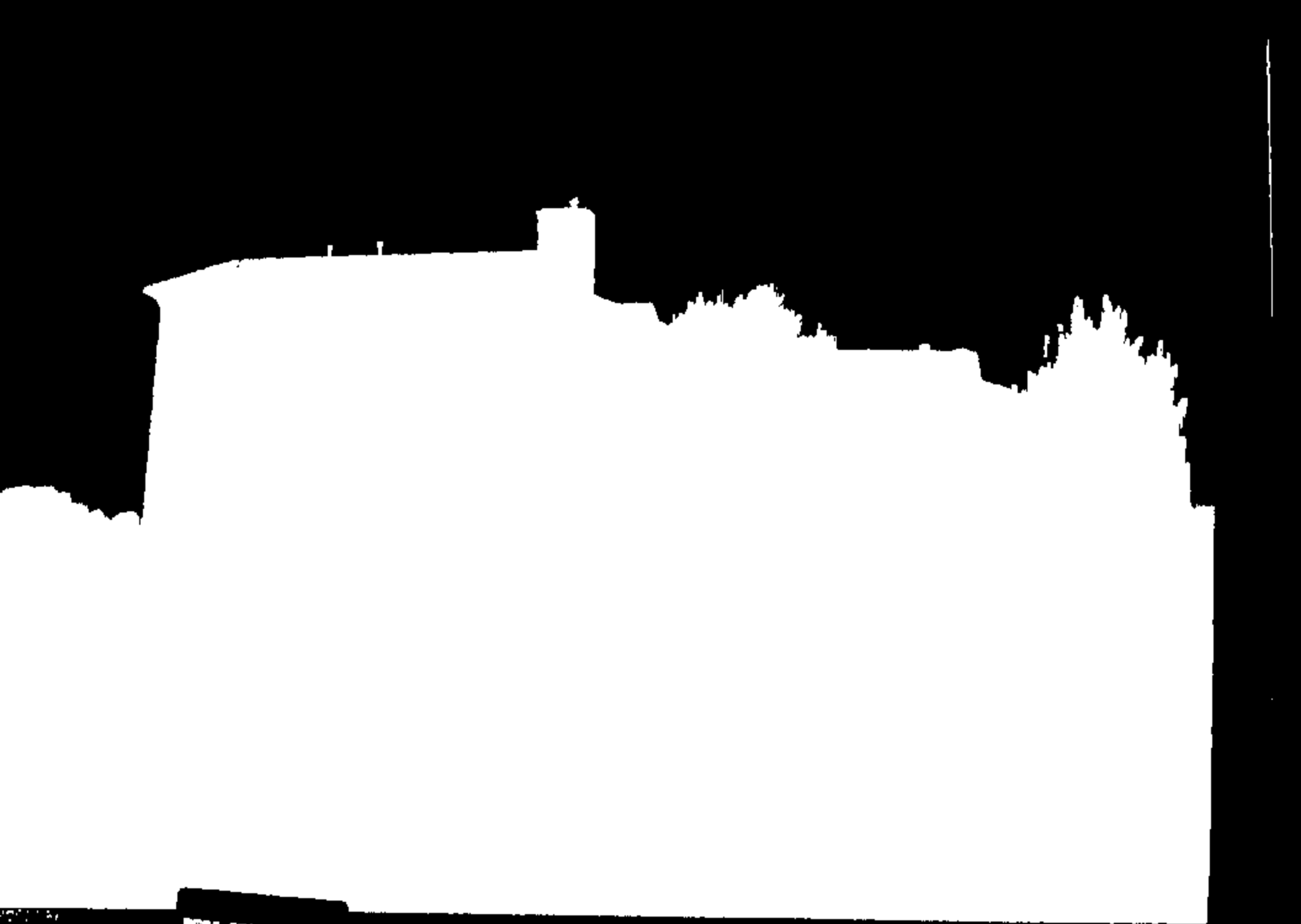
Camera

Sony Mavica digital

ME94-676 C 3763



PEB4-878 C 3789



PE04-078 C 3760



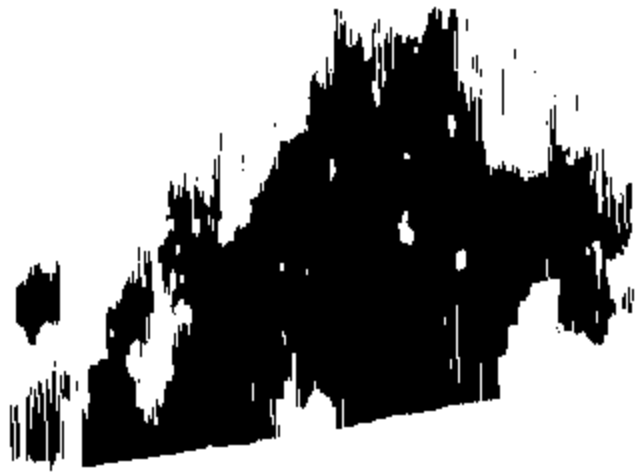
PE04-878 C 3761



PEB4-078 C 3782

PE84-878 C 3783

FD-304 (Rev. 5-22-64)



PE84-878 C 3785



PEB4-878 C 3788



FE04-078 C 3787



FE04-878 C 3786



PEB4-878 C 3769

PEM-878 C 3778

050119Z

PE84-878 C 3771



FEB-878 C 3772

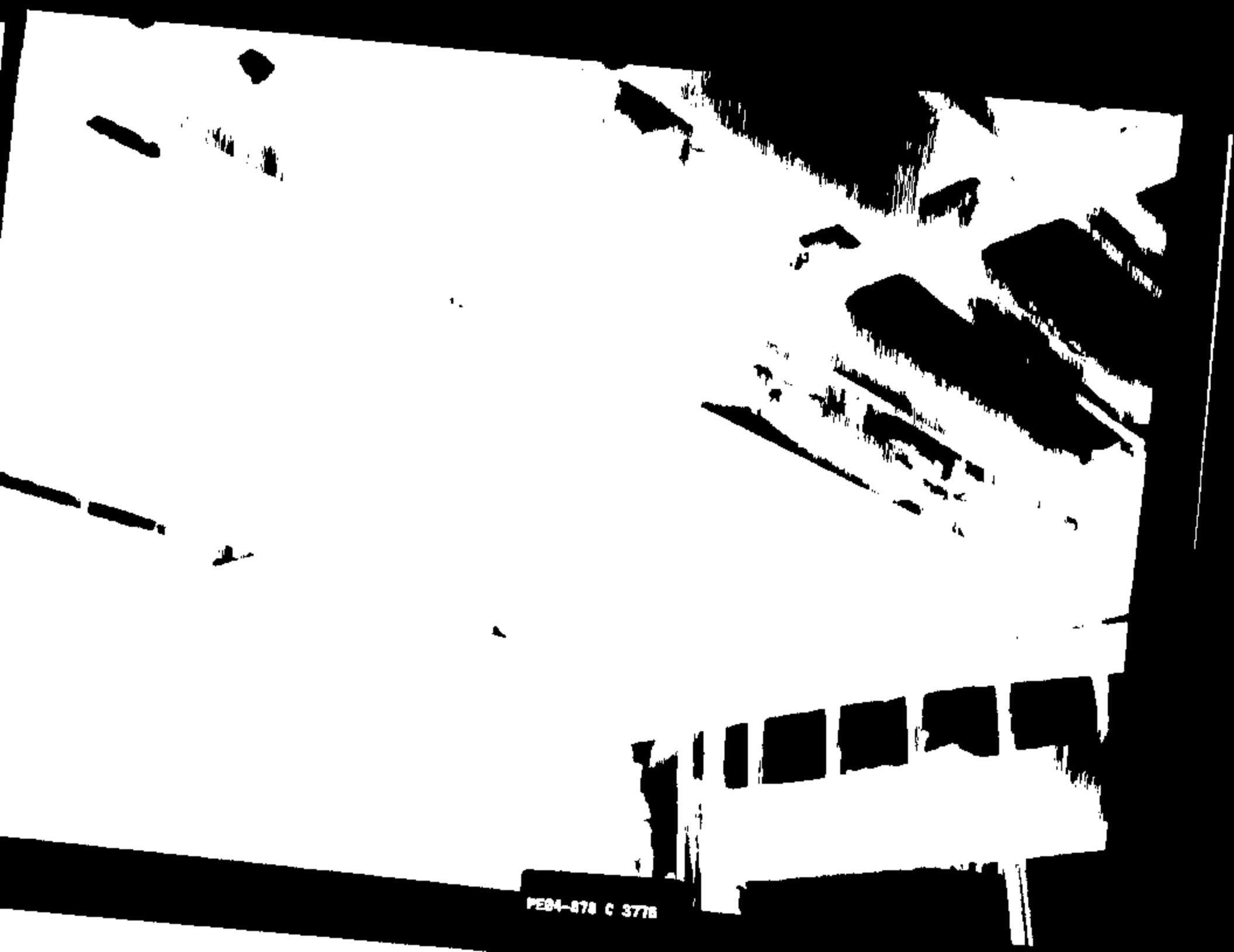


PE84-878 C 3773

PE84-878 C 3774



PEB4-878 C 3779



PE94-878 C 377B

[REDACTED]

[REDACTED]

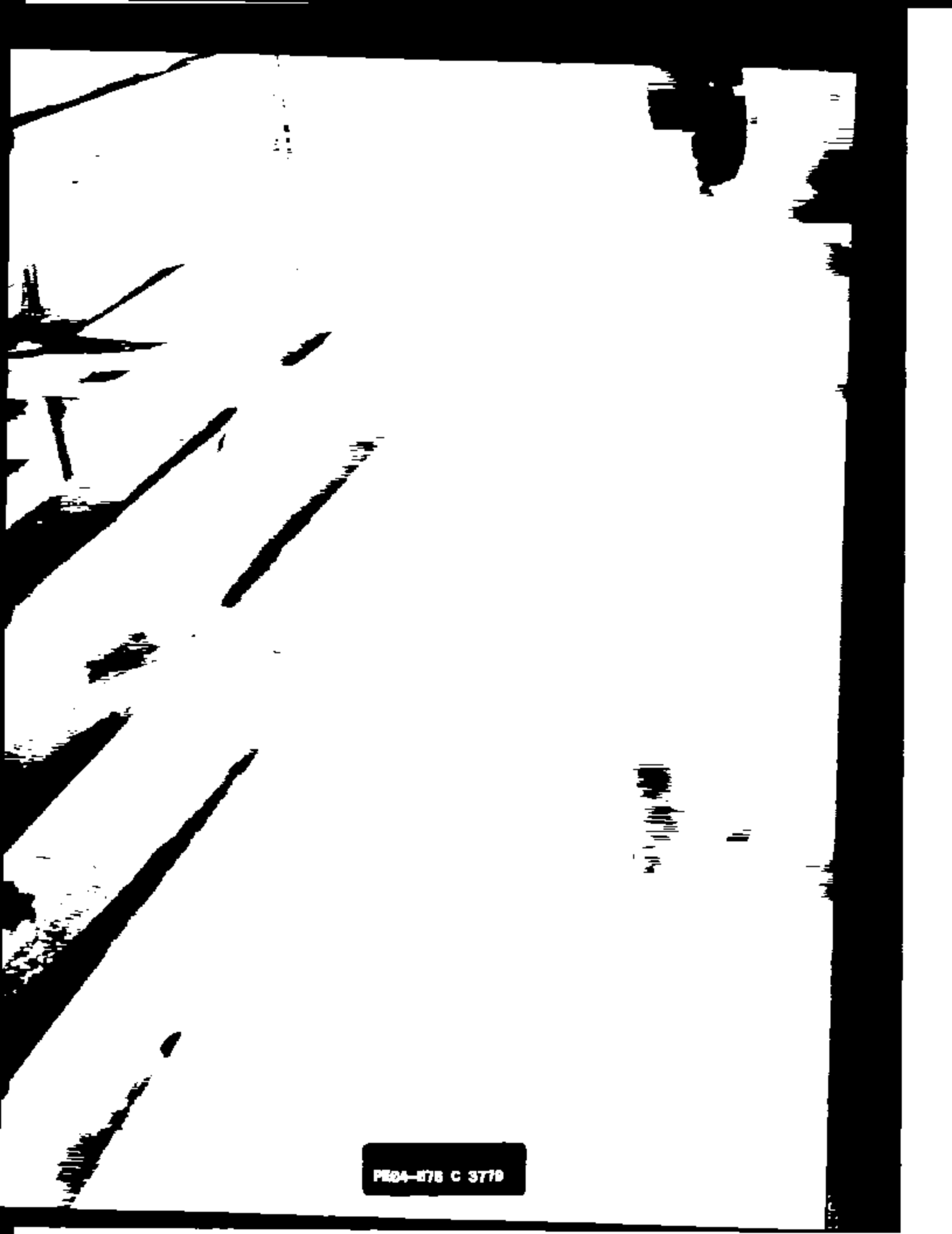
[REDACTED]

[REDACTED]

FEB-678 C 377



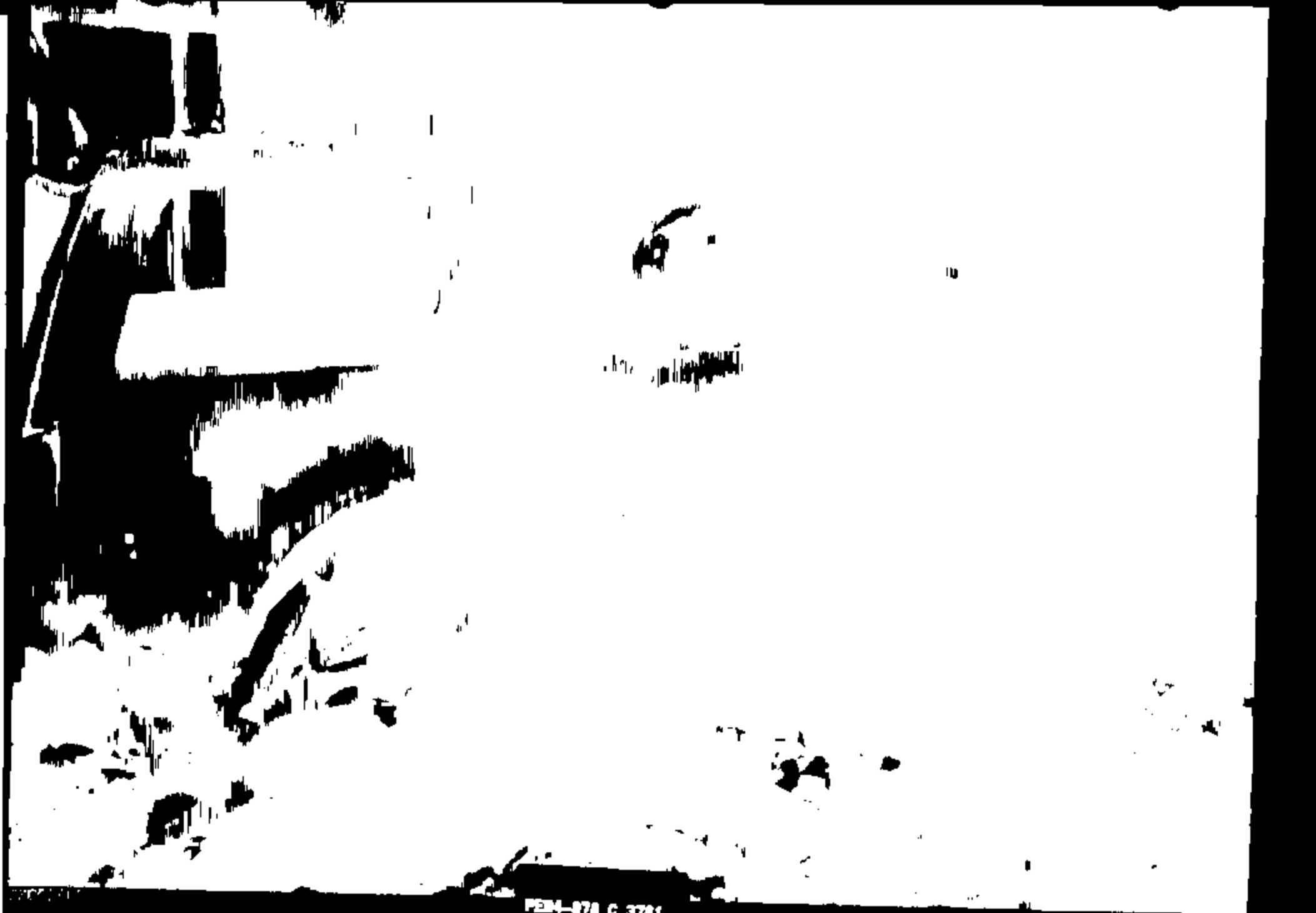
PE04-078 C 378



PR04-076 C 3770



PEB4-878 C 3708



PEM-878 C 3781



PE84-878 C 3782

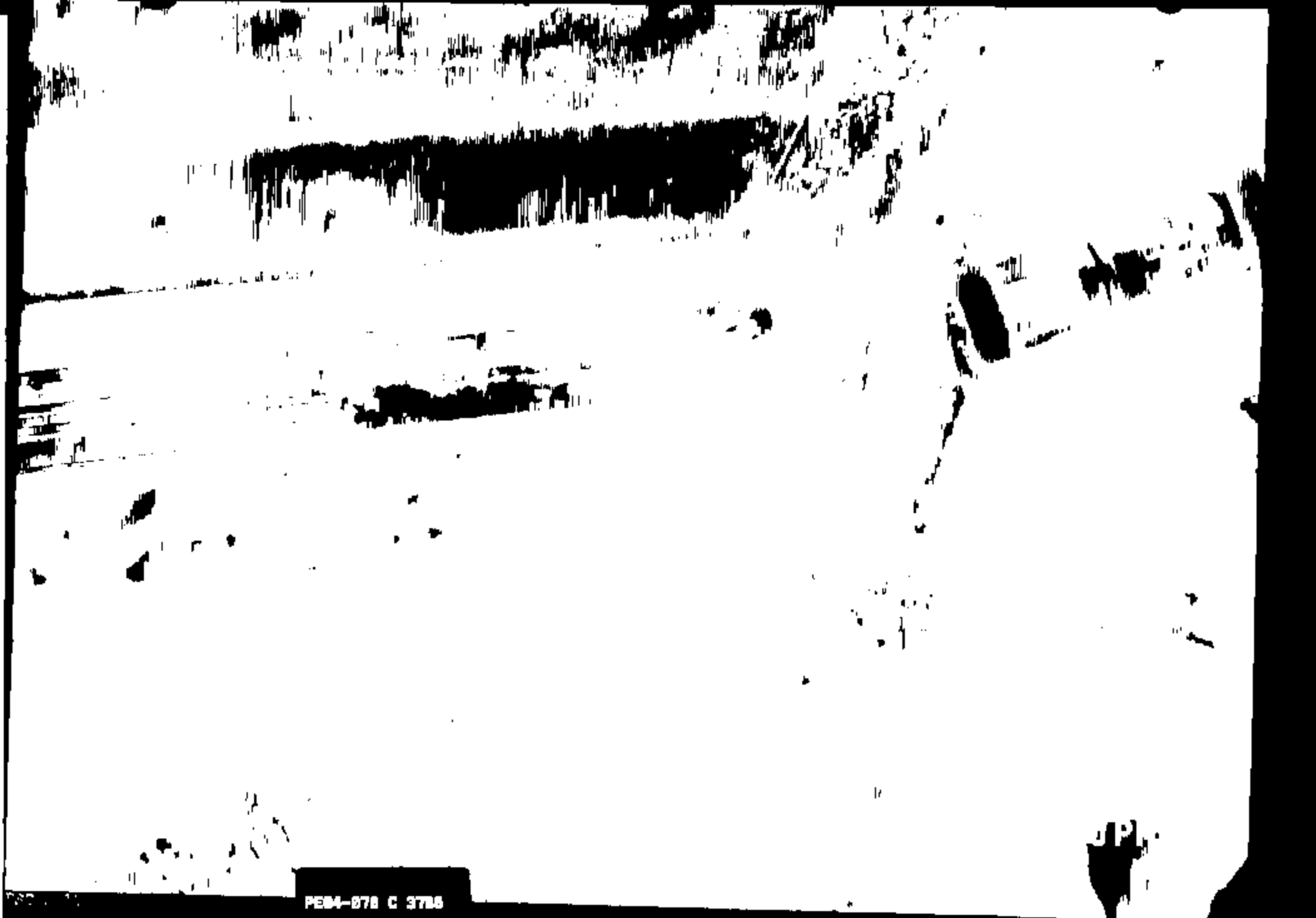
An aerial photograph showing a coastal area with a dark rectangular marker in the bottom left corner. The marker contains the text "PE84-878 C 3763". The photograph shows a mix of land and water, with some structures and vegetation visible on the land.

PE84-878 C 3763



FE04-878 C 3784

PEB-878 C 3785



PEM-078 C 3786



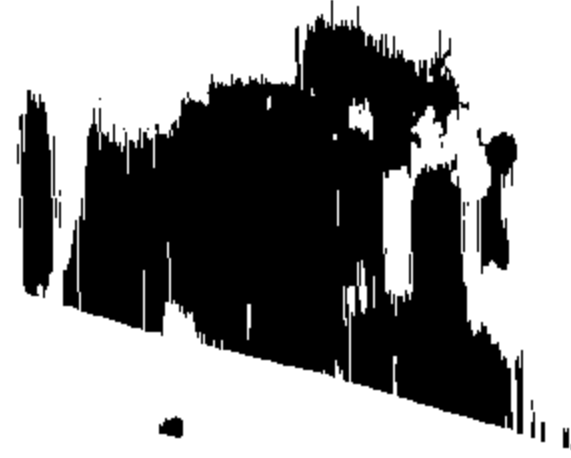
PEB4-678 C 3787



PE84-878 C 3788

PEM-878 C 3789

100-174



FEB-678 C 3788

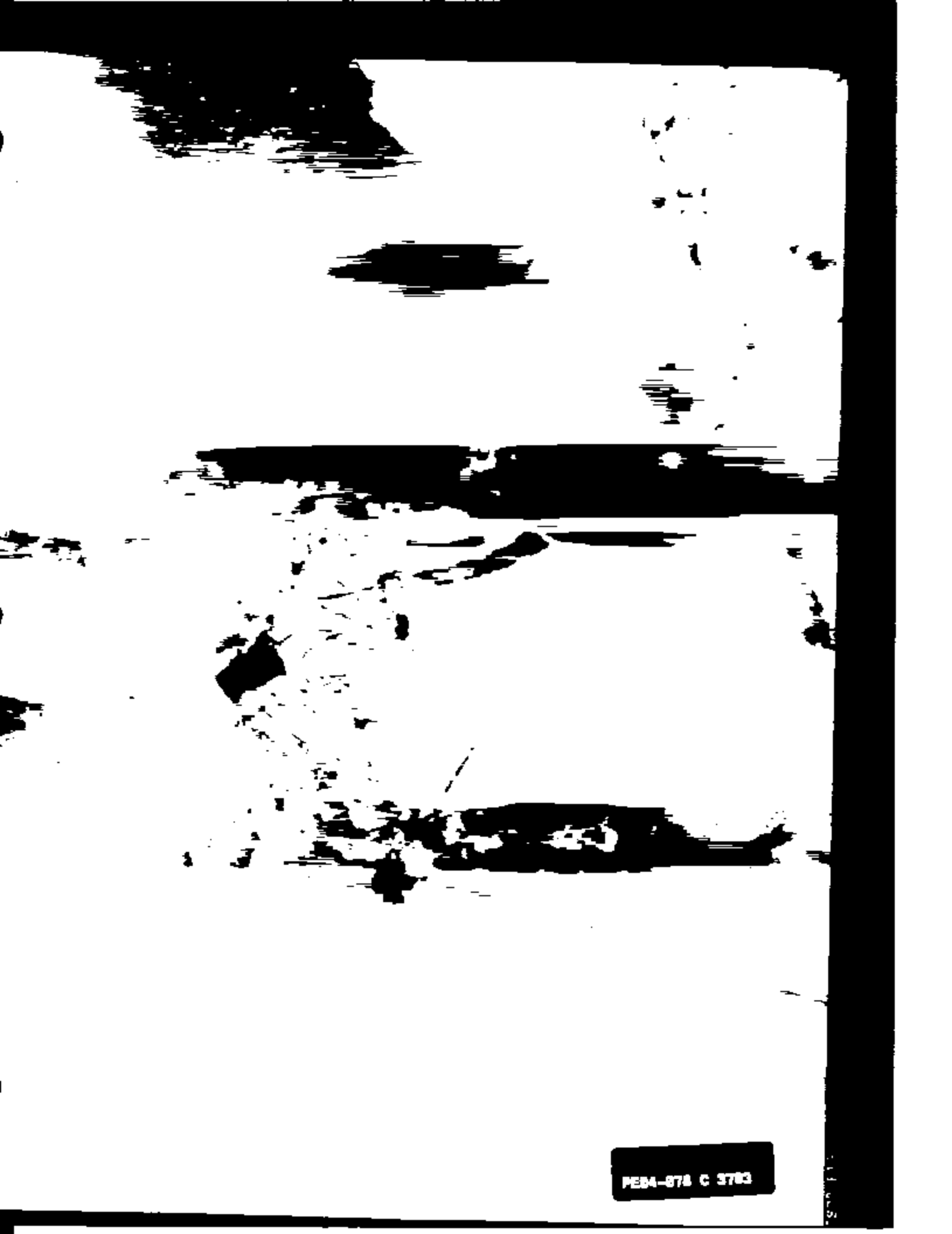
100-174

PEBA-878 C 3781

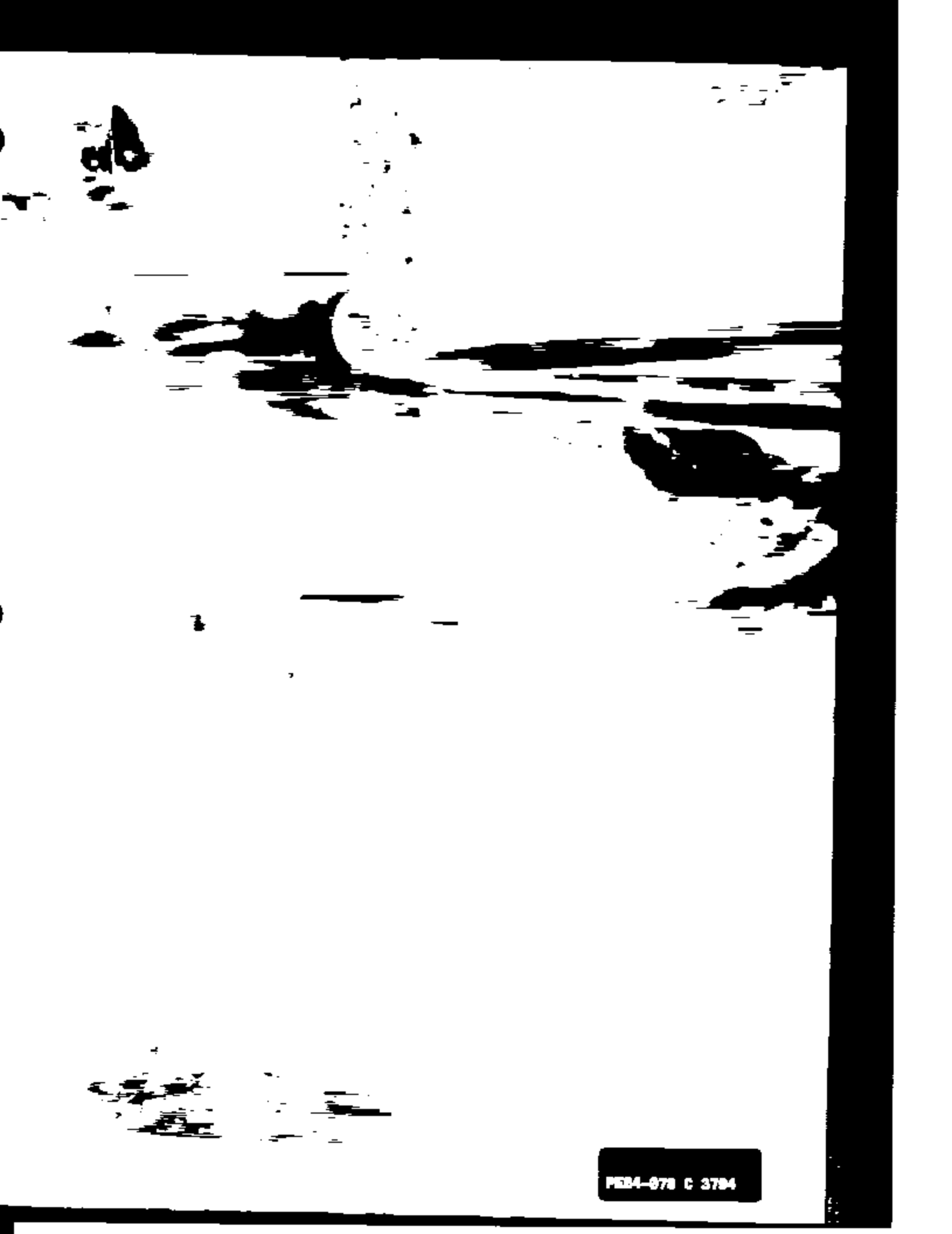


PE94-078 C 3782

02700111



PEBA-878 C 3783



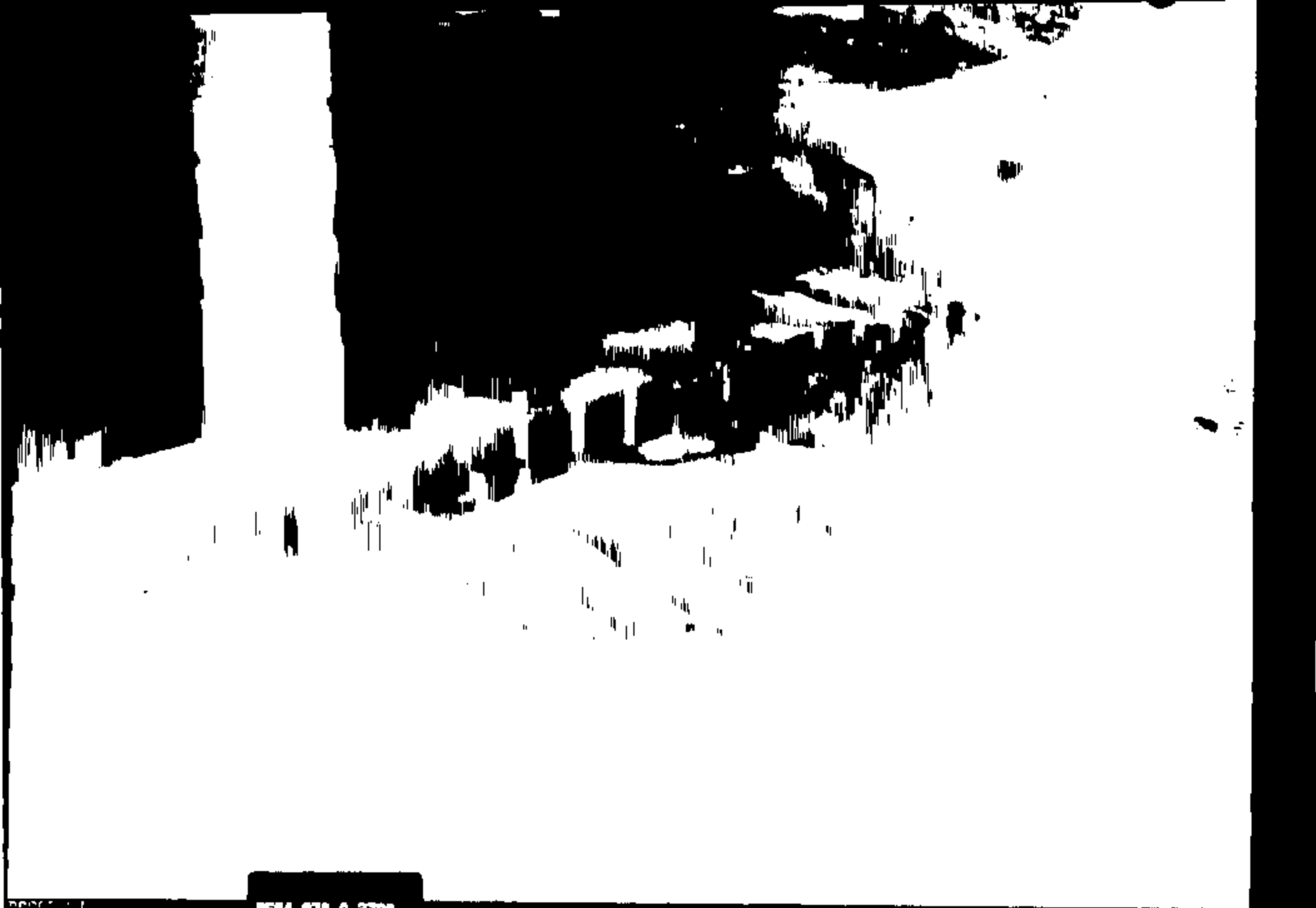
PEBA-078 C 3784





PR04-070 C 3706

FD-376 C 3797





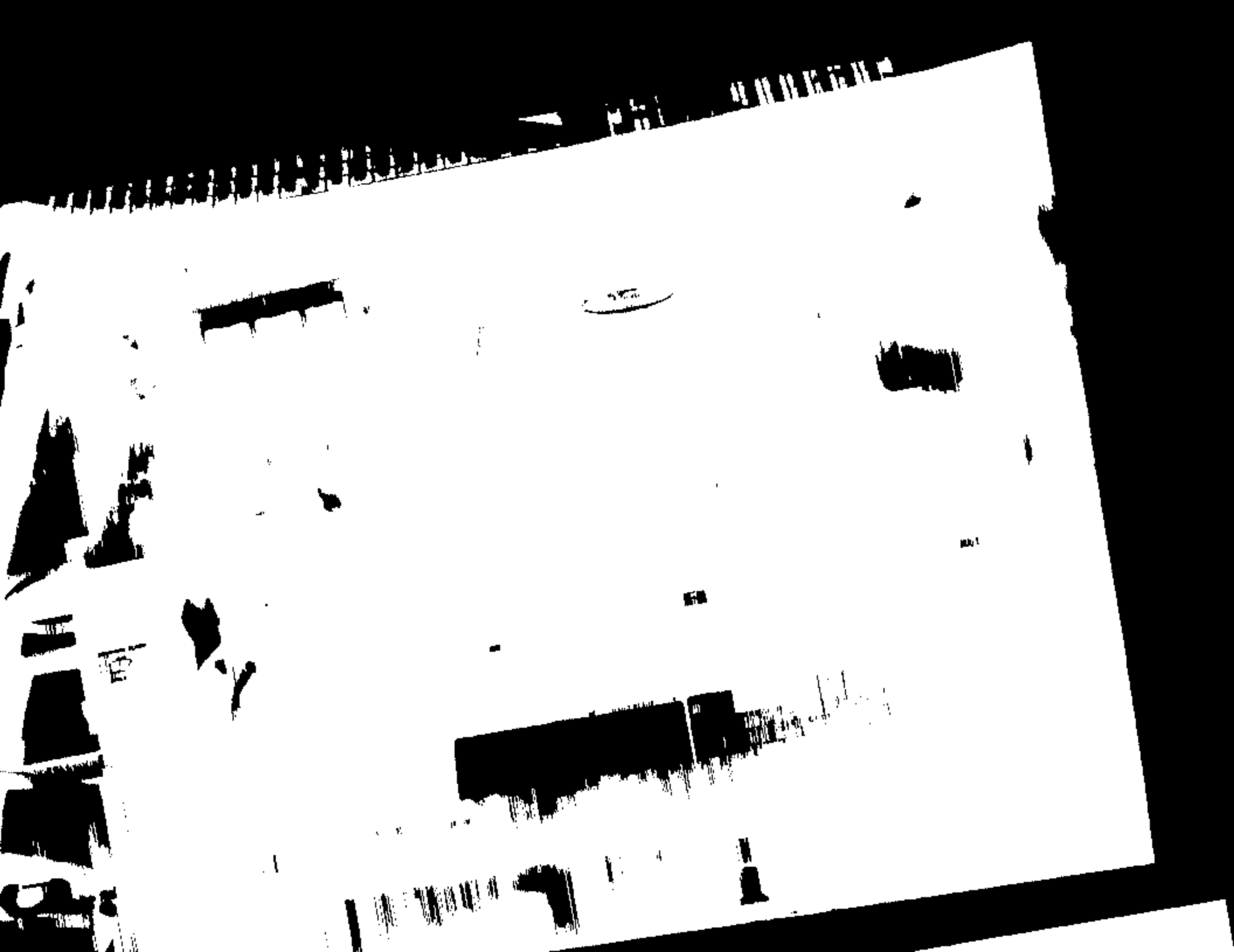
PE84-878 C 3788



FE04-076 C 3808



PE04-078 C 3001





PE94-878 C 3883



PE84-878 C 3884



PE04-878 C 3885



PEBA-978 C 3898

PE84-075 C 3887



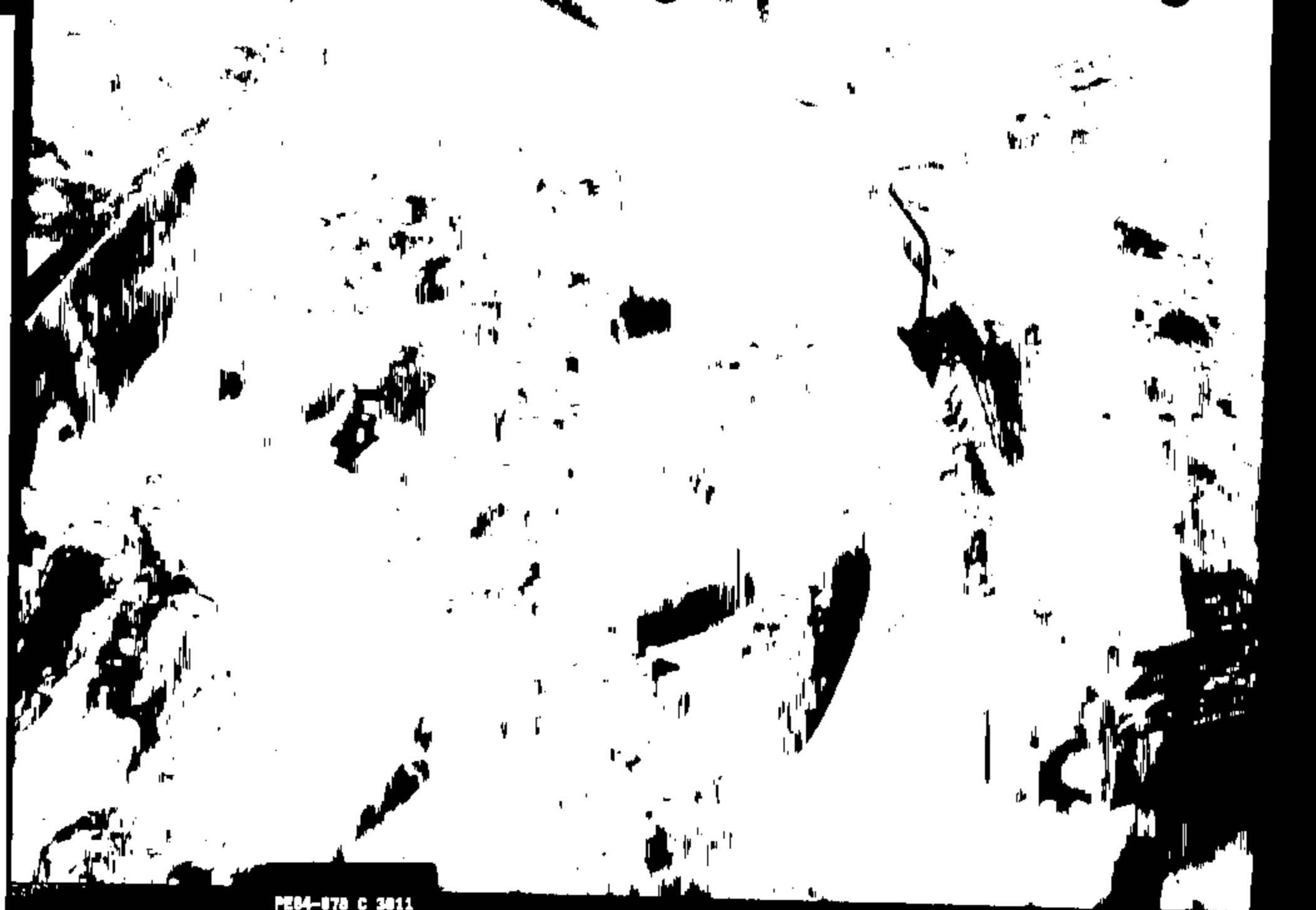
PEBA-878 C 3888



PEB4-878 C 3888



PEM-878 C 3818



PE64-878 C 3011



PE84-878 C 3812



PEB4-878 C 3813

237



18 12:06 PM

PE84-978 C 2814

1001507



PEB4-078 C 3815



PEB4-878 C 3816

7275
FEB4-878 C 3817

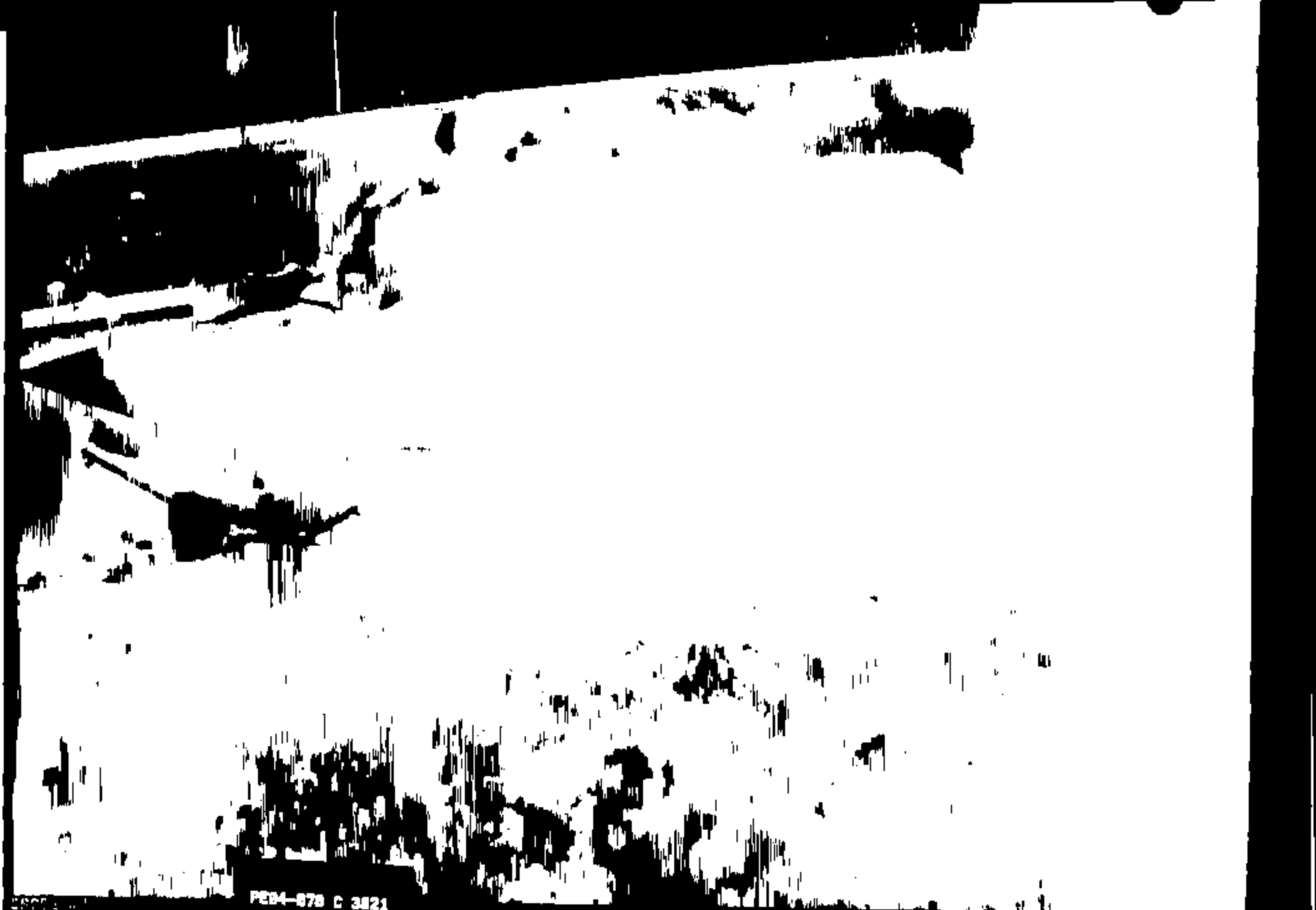
FD-302 (Rev. 11-27-70)

PE84-878 C 3818



P284-878 C 3028

2500 111



FE84-878 C 3821



WFO-078 C 3022

FD-304 (Rev. 1-25-60)

PE04-078 C 3824

PE04-076 C 3025



PE84-878 C 3826

PCD-678 C 3827

PEB4-67B C 382B

PE84-878 C 3829

PE84-878 C 3436



PE94-878 C 3831