

**PE04-078**

**FORD**

**1/28/2005**

**ATTACHMENT F**

**BOOK 9 OF 12**

**PART 5 OF 6**

LAW OFFICES  
**HARRIS, McCAUSLAND & SCHMITT, P.C.**

2001 CORONA ROAD, SUITE 305  
COLUMBIA, MISSOURI 65203  
573-445-8990  
FAX 573-445-8988  
www.hmcslawfirm.com

DANA M. HARRIS  
MICHAEL E. McCAUSLAND  
BEN T. SCHMITT  
MATTHEW F. MULHERN  
TODD C. BARRETT  
MICHAEL B. WHITE  
STEPHEN D. MANZ  
ERIC T. SWANSON  
RONALD D. MONTIETH  
CHARLES A. EDGELETT  
LESLEY RENFRO WILLSON  
LORNA H. HORTON

8233 WARD PARKWAY, SUITE 270  
KANSAS CITY, MISSOURI 64114  
816-523-3000  
FAX 816-523-1588

8500 COLLEGE BOULEVARD  
OVERLAND PARK, KANSAS 66210  
816-523-3000  
FAX 816-523-1588

JAN M. BARTALUK  
MARK D. CHUNIK  
JASON P. ROTH  
ANGELA D. LUCAS  
CLINE BOONE  
RACHAEL A. JACKSON  
BARRY A. GILBERT  
JOSEPH J. KOZDREW  
WILLIAM C. ELLIS  
BRIAN D. JENNIFER  
SARAH A. THOMPSON

OF COUNSEL  
THERESA SHEAN HALL

DOMINIC A. BELL  
JULIUS W. BARTON  
MICHAEL J. BROWN

November 4, 2004

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

RE: 2000 Ford Expedition  
VIN: 1FMPU18L1Y1 [REDACTED]  
DOL: September 18, 2004  
Vehicle Owners: [REDACTED]

Dear Ms. Norton :

Please find enclosed a copy of supplemental materials recently received from the Boone County Fire Protection District titled "Fire Investigation Report."

Thank you for your continued cooperation in this matter.

Sincerely



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





10/22/2004 16:12 FAX

A	03001	MO	09/18/2004	08	041487	0	NFIRS Remarks
	Unit	State	Incident Date	Shift	Incident Number	Pages	

## Remarks

On September 18, 2004 at 13:26 hours, the Boone County Fire Protection District was dispatched to a reported structure fire at 8000 County Air Lane South. Initial information indicated that there was a fire in the garage at that residence. Shortly after responding from Station 8, Engine 801 reported smoke showing from approximately 3 miles away.

Upon Engine 801's arrival, Engine 801 reported heavy fire involvement in the garage area of a two-story residence. Additional tankers had already been requested based on heavy smoke visible during response. Engine 801 deployed a 1-3/4" attack line through the front door of the residence in an effort to stop the horizontal extension of the fire from the garage area. Engine 1401 arrived and deployed additional lines in the garage area. The fire in the garage had extended to the attic above the garage and into the laundry room and bathroom area behind the garage in the living portion of the residence. Upon the arrival of this officer and Chief of Staff Rob Brown, the fire was extending through the attic and roof area above the garage toward the two-story section of the residence. Additional hose line from Engine 1401 was directed into the upper portion of the garage area and reduced the volume of fire and heat that was threatening the two-story portion of the residence. Positive pressure ventilation was established at the front door of the residence and the interior attack crew continued suppression activities in the kitchen area immediately adjacent to the garage and laundry room areas of the structure. Assistant Chief Doug Westhoff was assigned to the interior crew and effected ceiling removal so that attic extension could be contained above the kitchen area.

Fire containment was achieved and extinguishment followed within 30 minutes of arrival. Salvage and overhaul operations were commenced including removal of all personal effects threatened by ceiling collapse in the kitchen and living area. The fire was contained to the garage and attic areas above the garage and kitchen. No fire extension was experienced into the two-story portion of the dwelling.

Fire investigation was initiated by Fire Investigator Wilke and assisted by Investigator Karla. As a matter of procedure, since the owner of the dwelling was known to the organization, the Missouri State Fire Marshal's office was contacted to assist in the investigation. State Fire Marshal Investigator #1481 arrived on the scene approximately 2 hours after the initial alarm and assisted Fire District investigators with cause and origin determination.

Investigator Wilke, complaining of chest pains, was evaluated by medical personnel on the scene and transported to Boone Hospital Center for evaluation.

All units cleared the scene at 19:05 hours.

Authorization							
Officer/Engine ID	Signature	Position or rank	Assignment	Month	Day	Year	
	Craig Schatz	LT	Station 8	09	18	2004	
Member making report	Signature	Position or rank	Assignment	Month	Day	Year	
	Arva Paulsell	Chief	District	09	18	2004	

**MISSOURI STATE FIRE MARSHAL'S OFFICE  
DIVISION OF FIRE SAFETY  
ARSON INVESTIGATION UNIT**

**RESTRICTIVE COVER SHEET**

This report is the property of the Missouri Division of Fire Safety, Missouri State Fire Marshal's Office.

It is provided for your exclusive use and is not to be distributed outside your agency.

Reports generated by another agency will not be released by this Division. You are directed to contact that specific agency for copies.

This report is to be destroyed when no longer needed.

*502005*



*117*

*To: Suzanne Lovan  
From: Div. of Fire Safety  
Phone: 1-800-392-7766*

*Fax # 573-445-8988*



## CASE ACTIVITY REPORT

---

CASE NUMBER: 09-18-04-0247

DATE: 09/18/04

CASE NAME: [REDACTED]

CASE ACTIVITY: Follow-up

DATE OF ACTIVITY: 09/18/04

---

**Interview:**

[REDACTED]  
[REDACTED]  
Columbia, Missc  
[REDACTED]  
[REDACTED]

SSN: [REDACTED]

[REDACTED] was interviewed at the scene at 5:45 p.m., 09/18/04.

**Summary of interview:**

[REDACTED] said that he is employed at the Columbia Fire Department as a firefighter trainee. He said that he was not at home when his wife discovered the garage fire.

The interview concluded at 8:00 p.m., 09/18/04.

It is noted that [REDACTED] later identified the burned SUV parked in his garage as a 2000-year model Ford Expedition.

---

REPORT SENT TO:

INVESTIGATOR:

*Jim Trupani*

REGIONAL CHIEF:

*Bill Zierus*

---



# INCIDENT REPORT

01820040947

[Redacted]		Location	Columbia	County:	Boone
[Redacted]	0182004	Time	1:26 PM	Day:	Saturday
Date Requested		0182004	Time Requested	3:56 PM	Case#
				Weather	partly cloudy and cool
				Cause	Undetermined
<input type="checkbox"/> criminal_info <input type="checkbox"/> closed <input type="checkbox"/> warrant_app <input type="checkbox"/> unclassified		<input checked="" type="checkbox"/> electricity <input type="checkbox"/> natural_gas <input checked="" type="checkbox"/> lp_gas <input type="checkbox"/> wood <input type="checkbox"/> fuel_oil <input type="checkbox"/> none			
		Arrest:	<input type="checkbox"/> Offense:	Other	
Construction Type:		Wood Frame	Level	2	
Company Type:		Residential	Estimated Loss:	\$150,000.00	
No. Civilian Fatalities:		0	No. Firefighter Fatalities:	0	
No. Civilian Injuries:		0	No. Firefighter Injuries:	0	
Smoke Detectors Present:		Undetermined			
<input type="checkbox"/> PA_copy <input type="checkbox"/> Sheriff_copy <input type="checkbox"/> PD_copy <input type="checkbox"/> PO_copy <input type="checkbox"/> Other_copy					
Investigator 1:		Investigator 3:			
Investigator 4:		Investigator 5:			
Troyed, James - DSN 1483			Zirc, William		





**INCIDENT REPORT  
Owner Information**

0118/2004 0247

[Redacted]

Location: Columbia

Count: None

First: [Redacted] Last: [Redacted] Address: [Redacted]  
 City: Columbia State: MO Zip: [Redacted] Phone: [Redacted] Race: [Redacted] Sex: [Redacted]  
 Age: [Redacted] POB: Missouri Marital Status: Married  
 Occupation: Firefighter Trainee Employer: City of Columbia Phone: [Redacted]  
 DEA: [Redacted]

[Redacted]

Amount Insured:

\$537,400.00

Company: State Farm

Agency: Jim Kesterson, J.C., MO



**INCIDENT REPORT**  
**Owner Information**

07182004 0247

[Redacted]

Location Columbia

Count 6000

[Redacted] First [Redacted] Last [Redacted] Address [Redacted]  
 City: Columbia State: MO Zip: [Redacted] Phone [Redacted] Race [Redacted]  
 Age [Redacted] POB: Missouri Marital Status: Married  
 Description: Human Resources Representative Employer: State Farm Insurance Phone: [Redacted]  
 OIA:

[Redacted]

Amt on Statement: \$308,800.00 Company: State Farm Agency: Jim Keelerson, JC, MO



# INCIDENT REPORT Occupant Information

91820040247

Location: Columbia County: Boone

First: [REDACTED] Last: [REDACTED] Address: [REDACTED]  
 City: Columbia State: MO Zip: [REDACTED] Phone: [REDACTED] Race: [REDACTED] Sex: [REDACTED]  
 Age: [REDACTED] POB: Missouri Marital Status: Married  
 Occupation: Firefighter Trainee Employer: City of Columbia Phone: [REDACTED]  
 DBA:

Action Category: \$225,000.00 Category: State Farm Agency: Jim Keaton, JC, MO



# INCIDENT REPORT Occupant Information

0718/2004 0247

Location: Columbia County, State: [Redacted]

Name: [Redacted] Last: [Redacted] Address: [Redacted]  
 City: Columbia State: MO Zip: [Redacted] Phone: [Redacted] Race: [Redacted] Sex: [Redacted]  
 Age: [Redacted] POB: Missouri Marital Status: Married  
 Occupation: Human Resources Representative Employer: State Farm Insurance Phone: [Redacted]  
 DSA: [Redacted]

Annual Gross: \$220,000.00 Company: State Farm Agency: Jim Keaton, JC, MO

**CASE ACTIVITY REPORT**

CASE NUMBER: 09-18-04-247

DATE: 09/18/04

CASE NAME: [REDACTED]

CASE ACTIVITY: Incident Report

DATE OF ACTIVITY: 09/18/04

I was contacted at about 3:55 p.m., 09/18/04, by the Missouri State Highway Patrol dispatcher and advised that the Boone County Fire District was requesting assistance at a residential structure fire.

I arrived at the scene at 5:30 p.m., 09/18/04, and was met by members of the fire department, who had secured the scene.

REPORT SENT TO:

INVESTIGATOR:

*Jim Trapani*

REGIONAL CHIEF:

*Bill Zieris*

## CASE ACTIVITY REPORT

---

CASE NUMBER: 09-18-04-247

DATE: 09/18/04

CASE NAME: [REDACTED]

CASE ACTIVITY: Fire Scene Report

DATE OF ACTIVITY: 09/18/04

---

This fire occurred in a two-level wood frame house with a walkout basement. At the time of the fire, the structure was serviced with electricity and liquid propane gas.

Exterior examination of the roof showed heavy fire damage on the north end. No fire damage was observed on the south exterior wall of the structure. The east exterior wall sustained moderate smoke damage. The west exterior wall sustained fire damage on the north end. The north exterior wall (attached garage) was heavily burned. No evidence of exterior fire origin was observed.

Interior examination began on the basement level, which showed no evidence of fire damage. Examination of the electric circuit breaker panel located on the south basement wall showed no evidence of exterior/interior fire damage. Several of the thermal-magnetic circuit breakers were observed in the tripped position. The panel was eliminated as the ignition source causing the fire.

Examination on the second level of the structure showed no evidence of fire damage.

Fire damage on the main level was confined to the north and west sides of the structure. The kitchen located on the north side sustained heavy fire damage above the doorway leading to the mudroom. Most of the finished ceiling had been removed during overhaul operations conducted by members of the fire department prior to my arrival. Several of the exposed ceiling joists showed evidence of charring, which resulted from the communication of fire through the attic void.

The damage observed in this room was caused by the communication of fire from the west side of the structure. No evidence of fire origin was observed in this area.

The mudroom located west of the kitchen was burned throughout. The damage observed in this room was caused by the communication of fire from the attached garage located on the north end of the house. No evidence of fire origin was observed in this area.

The walk-in storage pantry and the laundry room located south of the mudroom were burned throughout. The damage observed in these rooms was caused by the communication of fire from the attached garage. No evidence of fire origin was observed in these areas.

The attached garage located north of the mudroom was burned throughout. The odor commonly associated with gasoline was detected upon initial entry. All interior contents had been removed prior to my arrival and placed in the driveway outside. The concrete garage floor was clear of debris and appeared to have been washed clean by members of the fire department.

Areas of heavy concrete spalling were observed near the center of the floor and around the burned remains of a passenger SUV parked along the east interior wall. Due to the extent of the damage, the make and model of the vehicle could not be identified. State license plate and VIN numbers could not be ascertained.

Exterior examination of the SUV showed heavy fire damage on all sides. All four tires were consumed by fire. The front hood appeared to be totally consumed. All window glass was found displaced. The fuel tank mounted to the undercarriage was consumed in the fire.

The passenger compartment was found burned throughout. Due to the extent of the damage in this area, it could not be ascertained if the ignition system was energized at the time of the fire. Evidence of interior fire origin could not be confirmed or eliminated.

The engine compartment sustained heavy fire damage throughout, destroying most of the vehicle's under-hood electrical system. The 12-volt battery appeared to have been consumed in the fire. The upper half of the motor and fuel delivery components sustained moderate to heavy fire damage. The driver's side cylinder head valve cover was found partially melted inward. The engine or the electrical system could not be confirmed or eliminated as the cause of the fire.

Due to the extent of the damage, this fire is listed as undetermined.

---

REPORT SENT TO:

INVESTIGATOR:

*Jim Trapani*

REGIONAL CHIEF:

*Bill Zieres*

---

**CASE ACTIVITY REPORT**

CASE NUMBER: 09-18-04-247

DATE: 09/18/04

CASE NAME: [REDACTED]

CASE ACTIVITY: Follow-up

DATE OF ACTIVITY: 09/18/04

**Statement:**[REDACTED]  
Columbia, Missouri [REDACTED]

DOB: [REDACTED]

SSN: [REDACTED]

Attached is a copy of a written statement from [REDACTED]

**Summary of statement:**

[REDACTED] said that on the afternoon of the fire, she put her son to bed at about 1:00 p.m. She said that she went downstairs and heard a strange hissing sound when she entered the kitchen. She said that she thought the sound was coming from her dryer in the laundry room. She said that she went to the laundry room and discovered that the sound was coming from the garage.

[REDACTED] said that she opened the garage door and observed smoke. She said that she ran back to the kitchen and called 911 for assistance. She said that she got her children out of the house and went to the backyard, where she observed black smoke coming out of the garage.

[REDACTED] said that one of the garage doors opened up a few minutes later. She said that she then observed the entire engine compartment of her SUV engulfed in flames. She said that the second garage door opened up a few minutes later.

**REPORT SENT TO:**

INVESTIGATOR:

*Jim Trapani*

REGIONAL CHIEF:

*Bill Zieres*



OCT-22-2004 09151

MO FIRE MARSHAL

573 526 4600 P.11/12

VOLUNTARY STATEMENT CASE 09-1P-04-247  
(NOT UNDER ARREST)

531  
090125  
[Redacted]

am not under arrest for, nor am I being detained for any criminal

offenses concerning the events I am about to make known to INVESTIGATOR JAMES TRAPANI  
Without being accused of or questioned about any criminal offenses regarding the facts I am about to state, I volunteer the following information of my own free will.

I am 37 years of age, and I live at COLUMBIA, M

I PUT GRANT TO BED A LITTLE AFTER 1:00PM IN HIS UPSTAIRS BEDROOM. I CAME BACK DOWNSTAIRS AND WENT TO THE KITCHEN. I HEARD A STRANGE HISsing SOUND. I THOUGHT IT WAS MY DRYER (I WAS DOING LAUNDRY). I HEADED FOR THE LAUNDRY ROOM + REALIZED THE SOUND WAS COMING FROM THE GARAGE. I OPENED THE DOOR TO THE GARAGE AND IT HAD A FORCE THAT PUSHED IT OPEN + SMOKE CAME INTO THE MUD ROOM. I RAN BACK TO THE KITCHEN + CALLED 911. I GRABBED MY CHILDREN + HEADED OUTSIDE THROUGH THE SCREENED-IN PORCH. I PULLED THE MUDROOM DOOR CLOSED BEFORE EXITING. WE WENT TO THE BACKYARD. BLACK SMOKE WAS POURING OUT FROM AROUND THE DOORS. AFTER A FEW MINUTES, THE DOUBLE GARAGE DOOR OPENED. I RAN UP THE HILL TO LOOK IN. <sup>HEAVY</sup> BLACK SMOKE CAME OUT. I COULD SEE THE ENTIRE ENGINE COMPARTMENT ENVELOPED IN FLAMES. ~~HEARD~~ ~~SMOKE~~ ~~COMING~~ ~~FROM~~ ~~THE~~ ~~ENGINE~~ ~~COMPARTMENT~~ ~~ENVELOPED~~ ~~IN~~ ~~FLAMES.~~ A LITTLE LATER THE 2ND GARAGE DOOR OPENED. WE RAN FURTHER DOWN THE HILL TO GET AWAY FROM THE HOUSE.

I have read each page of this statement consisting of 1 page(s), each page of which bears my signature, and corrections, if any, bear my initials, and I certify that the facts contained herein are true and correct.

Dated at 6:30 am 18 day of SEP 2004

WITNESS: [Signature]

[Signature]  
Signature of person giving voluntary statement.

WITNESS: \_\_\_\_\_

FORM 1774  
7/2003

RECEIVED

OCT 26 2004

LAW OFFICES

**HARRIS, McCAUSLAND & SCHMITT, P.C.**

2001 CORONA ROAD, SUITE 305  
COLUMBIA, MISSOURI 65203  
573-445-8980  
FAX 573-445-8988  
www.hmcslawfirm.com

DANA M. HARRIS  
MICHAEL E. McCAUSLAND  
BEN T. SCHMITT  
MATTHEW F. MULHERN  
TODD C. BARRETT  
MICHAEL B. WHITE  
STEPHEN D. MANZ  
ERIC T. SWANSON  
RONALD D. MONTEITH  
CHARLES A. EDGELLER  
LESLEY RENFRO WILLSON  
LORNA H. HORTON

9233 WARD PARKWAY, SUITE 270  
KANSAS CITY, MISSOURI 64114  
816-523-3000  
FAX 816-523-1588

8500 COLLEGE BOULEVARD  
OVERLAND PARK, KANSAS 66210  
816-523-3000  
FAX 816-523-1588

IAN M. BARTALOG  
MARK D. CHUNING  
JASON P. ROTH  
ANGELA D. LUCAS  
CLINE BUONE  
RACHAEL A. TAGGART  
BARRY A. GILBERT  
JOSEPH J. KOONER  
WILLIAM C. ELLIS  
BRIAN D. JENKINS  
SARAH A. THOMPSON

OF COUNSEL  
THERESA SHEAN HALL

STATE BAR OF MISSOURI  
ALL OTHERS ADMITTED BY  
COURT ORDER

October 22, 2004

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

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

Dear Ms. Norton :

This responds to your October 18, 2004 letter requesting additional information.

We do not have a statement from either vehicle owner at this time. You are welcome to coordinate through us to obtain a statement from the [REDACTED] with a representative of this firm present. Please advise should you wish to do so.

Further, you request color photographs of the fire and alleged defective parts. We are waiting on the inspection to complete such. We understand that Ford's expert, Mr. Helton of Newell Investigation, will meet Mr. Clarke to inspect the vehicle on November 1, 2004. Accordingly, you will be able to obtain all requested photos and participate in the investigation of this fire. Of course, our own investigation remains privileged work product. Obviously, where the vehicle remains in its original position following the fire, obtaining photographs of interior parts of the vehicle from different angles is not currently possible. We will attend that inspection. Please advise if you expect to do so.

As well, we will advise you as to the total losses related to the fire of the vehicle and residence, when those have been adequately summarized.

Also, you request the vehicle service history. That vehicle was purchased at Sunset Ford in the St. Louis area and received maintenance at Joe Machen's dealership in Columbia, Missouri. Of course, you will be able to obtain those through your own dealership. We will make additional relevant service records available to you, after we obtain them.

PE04-078 C 3548

Ms. Shawn Norton  
October 22, 2004  
Page 2

Also, you requested a copy of the police and/or fire report for this incident. You may obtain them directly from the Boone County Fire Protection District in Columbia, Missouri, as well as the Missouri State Fire Marshall's office in Jefferson City, Missouri. We do not yet have the Boone County FPD report, but have enclosed the Fire Marshall's report for you.

Further, as we have previously stressed, [REDACTED] are very anxious to begin reconstruction of their home, as it is currently not capable of being occupied. Of course, it is necessary for the vehicle to be inspected in place before it can be removed and that construction begun. Therefore, we will not delay the November 1, 2004 inspection.

Thank you for your cooperation in this matter. Please do not hesitate to contact me with any further questions or comments you may have.

Very Truly Yours,

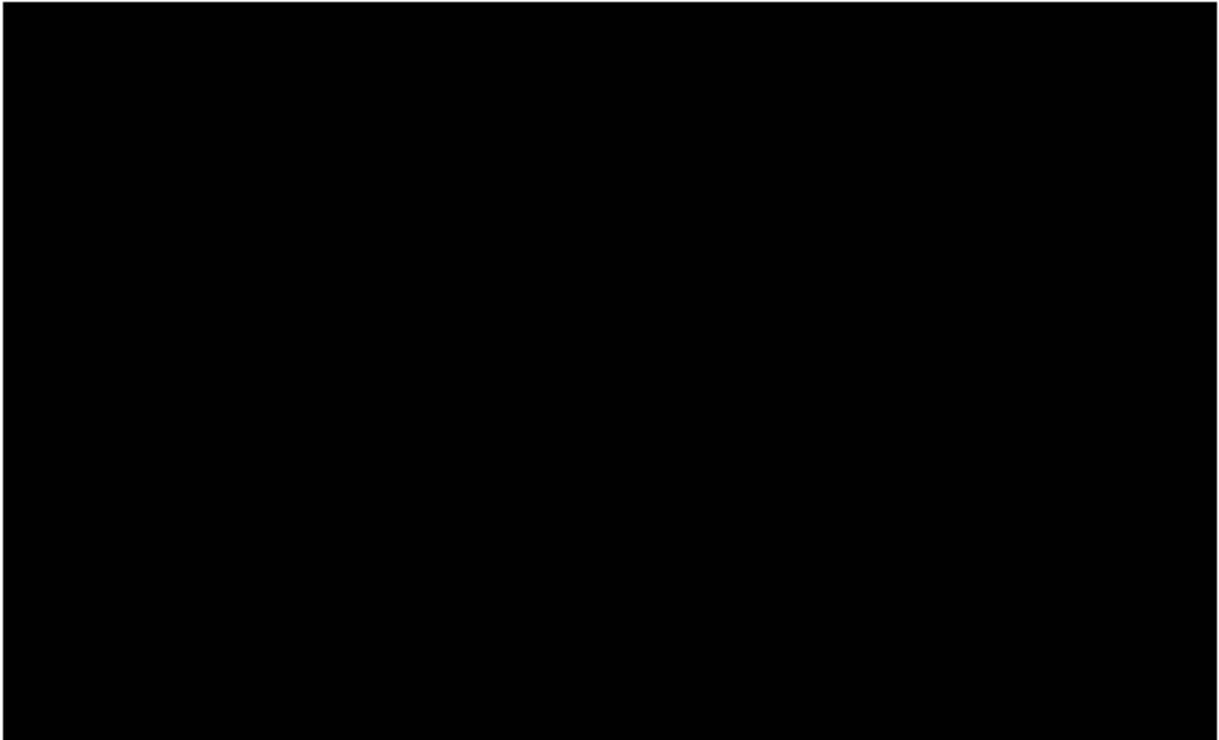


Loma H. Horton  
(573) 445-8990  
LHH/BAG/alw/Enclosure

Ms. Shawn Norton  
October 22, 2004  
Page 3

bpc:

Ms. Angela King  
State Farm Insurance Company  
P.O. Box 419059  
St. Louis, Missouri 63141



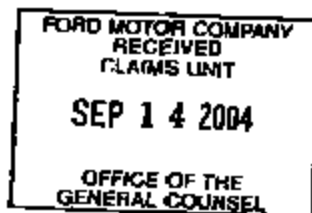
# State Farm Insurance Companies®



September 8, 2004

Mid Rivers Service Center  
P.O. Box 560  
St. Peters, MO 63376

FORD MOTOR COMPANY  
PARKLANE TOWERS WEST STE 400  
3 PARKLANE BLVD  
DEARBORN MI 48126-2568



RE: Claim Number: [REDACTED]  
Date of Loss: September 3, 2004  
Make, Model and Year of Product: 2000 Ford Expedition, Four-Door  
Vehicle Identification Number: 1FMRU1668YL [REDACTED]

Dear Sir/Madam:

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 an opportunity to inspect the vehicle and give you advanced notice of our potential subrogation claim. Please contact me at 866-311-8697 and set up a time for your inspection.

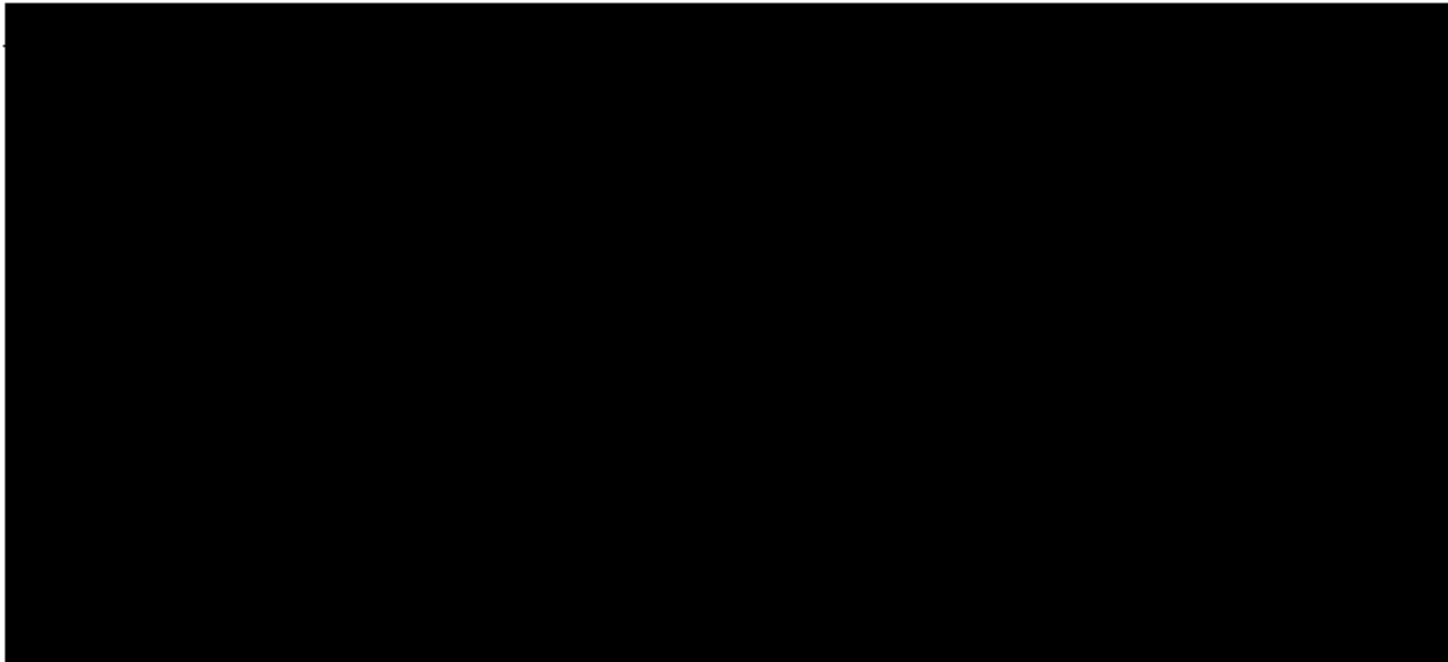
Effective September 13, 2004, our new office address is:

State Farm Insurance®  
P.O. Box 419106  
St. Louis, Missouri 63141

Sincerely,

Gail Woods  
Claim Representative  
State Farm Mutual Automobile Insurance Company

035/0908002



PE04-078 C 3853

1 **L. JOSEPH POLINER, INC.**  
2 A PROFESSIONAL LAW CORPORATION  
3 5933 WEST CENTURY BOULEVARD, SUITE 1110  
4 LOS ANGELES, CALIFORNIA 90045-3451  
5 (310) 670-5789

**ORIGINAL FILED**

MAY 25 2000  
LOS ANGELES  
SUPERIOR COURT

L. Joseph Poliner, State Bar No. 30242

Attorneys for Plaintiff

MUNICIPAL COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES, GLENDALE JUDICIAL DISTRICT

CASE NO. 00701295

[REDACTED] a corporation,

Plaintiff,

v.

COMPLAINT IN SUBROGATION FOR  
DAMAGES

FORD MOTOR COMPANY, INC.;  
PARADISE FORD; and DOE 1 to DOE  
20, Inclusive,

Defendants.

Principal Demand of Complaint: \$25,000.00

Plaintiff alleges:

FIRST CAUSE OF ACTION  
AGAINST ALL DEFENDANTS  
(Negligence)

1. Plaintiff, [REDACTED] at all times herein  
mentioned also known as [REDACTED] and at all times herein  
mentioned was, a corporation organized and existing and authorized to transact, and transacting  
business in the State of California as an automobile insurer.

2. HAMLET MIRZAKHANIAN, at all times herein mentioned, was the lessor and  
operator of a 1999 Ford Expedition automobile, vehicle identification number



1 IFMRU17L3X [REDACTED] hereinafter referred to as "the Insured Vehicle").

2 3. BANK OF THE WEST, a business organization whose form is unknown, is, and  
3 at all times herein mentioned was, authorized to do and doing business in the State of California  
4 as a lending institution, and was at all times herein mentioned the holder of a lien on the Insured  
5 Vehicle, as security for financial accommodations extended to [REDACTED]  
6 with respect to the Insured Vehicle by BANK OF THE WEST, a business organization whose  
7 form is unknown.

8 4. At all times herein mentioned, the Insured Vehicle was insured against loss or  
9 damage under to the Insured Vehicle under a policy of insurance (hereinafter referred to as "the  
10 Policy") issued by Plaintiff to [REDACTED] as the named insured.

11 5. Plaintiff is informed and believes, and based on such information and belief  
12 alleges, that Defendant FORD MOTOR COMPANY, INC., is, and at all times herein mentioned  
13 was, a business organization, whose form is unknown, authorized to do business and doing  
14 business in the State of California, within the geographical boundaries of the Municipal Court of  
15 California, County of Los Angeles.

16 6. Plaintiff is informed and believes, and based upon such information and belief  
17 alleges, that at all times mentioned herein Defendants FORD MOTOR COMPANY, INC. and  
18 DOES 1 to 10, inclusive are, and were at all times herein mentioned, engaged in interstate  
19 business and commerce to members of the general public including residents of the State of  
20 California.

21 7. Plaintiff is informed and believes, and based on such information and belief  
22 alleges, that Defendants FORD MOTOR COMPANY, INC., and DOES 1 to 10, inclusive are,  
23 and were at all times herein mentioned, engaged in the business of designing, manufacturing,  
24 constructing, assembling, and selling automobiles and other motor vehicles and motor vehicle  
25 components.

26 8. Plaintiff is informed and believes, and based upon such information and belief  
27 alleges, that Defendants PARADISE FORD, a business organization whose form is unknown,  
28 and DOES 11 to 20, inclusive, are, and were at all times herein mentioned, engaged in the

1 business of maintaining, repairing, leasing and selling automobiles within the geographical  
2 boundaries of the Glendale Judicial District, including but not limited to the City of Montrose, in  
3 the County of Los Angeles, State of California, and are, and were at all times herein mentioned.  
4 franchised dealers of Defendants FORD MOTOR COMPANY, INC., and DOES 1 to 10,  
5 inclusive.

6 9. Plaintiff is informed and believes, and based upon such information and belief  
7 alleges, that Defendants DOES 1 to 20, inclusive, are and were at all times herein mentioned,  
8 each business organizations whose forms are unknown, or individuals, who are, and were at all  
9 times herein mentioned, authorized to transact and transacting business, or residing, in the  
10 County of Los Angeles, State of California.

11 10. The true names and capacities, whether individual, corporate, associate or  
12 otherwise, of the Defendants sued herein as DOE 1 to DOE 20, inclusive, are presently unknown  
13 to Plaintiff, who therefore sues said Defendants by such fictitious names and will seek leave of  
14 Court to amend its Complaint to insert herein their true names and capacities when the same have  
15 been ascertained. Plaintiff is informed and believes, and based on such information and belief  
16 alleges, that each of such fictitiously named Defendants is responsible in some manner for the  
17 occurrences herein alleged, and that Plaintiff's damages as herein alleged were proximately  
18 caused by the conduct of each of such fictitiously named Defendants.

19 11. Plaintiff is informed and believes, and based on such information and belief  
20 alleges, that at all times herein mentioned each of the Defendants was the agent, servant,  
21 representative or employee of each of the remaining Defendants, and that in doing the things  
22 hereinafter mentioned, Defendants, and each of them, were at all times acting either as principals  
23 or within the scope of their authority and employment as such agents, servants, representatives or  
24 employees of each of the remaining Defendants, and were acting with the permission and consent  
25 of the remaining Defendants.

26 12. Sometime prior to May 19, 1999, Defendants FORD MOTOR COMPANY, INC.,  
27 and DOES 1 to 10 manufactured the Insured Vehicle for ultimate sale or lease to the public.

28 13. Sometime prior to May 19, 1999, Defendants FORD MOTOR COMPANY, INC.

1 and DOES 1 to 10 sold the Insured Vehicle to Defendants PARADISE FORD and DOES 11 to  
2 20 for resale or lease to the public.

3 14. On or about May 19, 1999, Plaintiff's aforesaid insured, [REDACTED]  
4 [REDACTED] leased the Insured Vehicle from Defendants PARADISE FORD and DOES  
5 11 to 20, at their place of business described above.

6 15. At all times herein mentioned, Defendants FORD MOTOR COMPANY, INC.,  
7 and DOES 1 to 10 so negligently and carelessly designed, manufactured, constructed, assembled,  
8 and sold the Insured Vehicle that it was dangerous and unsafe for its intended and reasonably  
9 foreseeable uses.

10 16. At all times herein mentioned, Defendants PARADISE FORD and DOES 11 to  
11 20, so negligently and carelessly maintained, repaired, sold and leased the Insured Vehicle that it  
12 was dangerous and unsafe for its intended and reasonably foreseeable uses.

13 17. As a direct and proximate result of the negligence of the Defendants, and each of  
14 them, as set forth above, the Insured Vehicle was involved in a vehicle fire on or about August  
15 24, 1999, along and upon the Interstate 210 Freeway eastbound at or near its juncture with  
16 Sunland Boulevard, in the County of Los Angeles, State of California, causing the Insured  
17 Vehicle to sustain property damage and causing Plaintiff to sustain the damages described below.

18 18. As a direct and further proximate result of the negligence of Defendants, and each  
19 of them, as set forth above, and the vehicle fire hereinabove alleged, the Insured Vehicle was  
20 damaged and required repairs costing in excess of the sum of \$32,902.00, which rendered the  
21 Insured Vehicle a total loss in that the cost of repairs exceeded the reasonable value of the  
22 Insured Vehicle.

23 19. The Defendants, and each of them, knew the Insured Vehicle would be leased and  
24 used without inspection for defects. The Insured Vehicle was defective when it left the control of  
25 each Defendant. At the time of the aforesaid vehicle fire, the Insured Vehicle was being used in  
26 the manner intended by the Defendants, and each of them, or in a manner that was reasonably  
27 foreseeable by the Defendants, and each of them, as involving a substantial danger not readily  
28 apparent. Adequate warnings of the danger were not given.



1 described below.

2 25. As a further direct and proximate result of the defective and dangerous condition  
3 of the Insured Vehicle and its component parts, and the collision hereinabove alleged, the Insured  
4 Vehicle was damaged and required repairs costing in excess of the sum of \$32,402.00.

5 THIRD CAUSE OF ACTION

6 AGAINST ALL DEFENDANTS

7 (Breach of Express Warranty)

8 26. Plaintiff repeats and realleges each and every allegation contained in paragraphs 1  
9 through 14, inclusive, and paragraphs 19 through 21, inclusive, hereinabove set forth, and  
10 incorporates the same herein by reference.

11 27. Defendants, and each of them, expressly warranted that the Insured Vehicle was  
12 merchantable, safely designed, and fit for the purposes for which it was designed, produced, sold,  
13 leased, and intended and reasonably foreseeable to be used.

14 28. Defendants, and each of them, breached those express warranties described above  
15 in that the insured Vehicle was not merchantable, safely designed, nor fit for its intended and  
16 reasonably foreseeable uses.

17 29. As a direct and proximate result of the Defendants', and each of theirs, breach of  
18 the express warranties set forth above, the Insured Vehicle was involved in a vehicle fire on or  
19 about August 24, 1999, along and upon the Interstate [REDACTED] eastbound at or near its  
20 [REDACTED] in the County of Los Angeles, State of California, causing the  
21 Insured Vehicle to sustain property damage and causing Plaintiff to sustain the damages  
22 described below.

23 30. As a further direct and proximate result of the Defendants', and each of theirs,  
24 breach of the express warranties set forth above, and the collision hereinabove alleged, the  
25 Insured Vehicle was damaged and required repairs costing in excess of the sum of \$32,402.00.

26 31. On or about March 2, 2000 Plaintiff notified Defendants, and each of them, of the  
27 breach of the express warranties set forth above in accordance with the provisions of Section  
28 2697(3)(a) of the Uniform Commercial Code. Copies of the notices are attached hereto

1 collectively as Exhibit "A" and are incorporated herein by reference.

2 FOURTH CAUSE OF ACTION

3 AGAINST DEFENDANTS PARADISE FORD and DOES 11 to 20, inclusive

4 (Breach of Implied Warranty)

5 32. Plaintiff repeats and realleges each and every allegation contained in paragraphs 1  
6 through 14, inclusive, and paragraphs 19 through 21, inclusive, hereinabove set forth, and  
7 incorporates the same herein by reference.

8 33. Plaintiff is informed and believes, and based on such information and belief  
9 alleges, that at the time Plaintiff's aforesaid insured, [REDACTED] leased the  
10 Insured Vehicle from Defendants PARADISE FORD, and DOES 11 to 20, Defendants  
11 PARADISE FORD, and DOES 11 to 20, and each of them, impliedly warranted that the Insured  
12 Vehicle was of merchantable quality and was safe and fit for its intended and reasonably  
13 foreseeable uses.

14 34. Defendants PARADISE FORD, and DOES 11 to 20, and each of them, breached  
15 the implied warranty described above in that the Insured Vehicle was not of merchantable quality  
16 and was not safe and fit for its intended and reasonably foreseeable uses.

17 35. As a direct and proximate result of Defendants' PARADISE FORD, and DOES  
18 11 to 20, and each of theirs, breach of the implied warranty described above, the Insured Vehicle  
19 was involved in a vehicle fire on or about August 24, 1999, along and upon the Interstate 210  
20 Freeway eastbound at or near its juncture with Sunland Boulevard, in the County of Los Angeles,  
21 State of California, causing the Insured Vehicle to sustain property damage and causing Plaintiff  
22 to sustain the damages described below.

23 36. As a further direct and proximate result of the Defendants' PARADISE FORD  
24 and DOES 11 to 20, and each of theirs, breach of the implied warranty described above, and the  
25 vehicle fire hereinabove alleged, the Insured Vehicle was damaged and required repairs costing  
26 in excess of the sum of \$32,402.00.

27 37. On or about March 2, 2000, Plaintiff notified Defendants, PARADISE FORD,  
28 and DOES 11 to 20, and each of them, of the breach of the implied warranty set forth above in

1 accordance with the provisions of Section 2697(3)(a) of the Uniform Commercial Code. A copy  
2 of the notice is attached hereto as Exhibit "B" and is incorporated herein by reference.

3 WHEREFORE, Plaintiff prays for Judgment against the Defendants, and each of  
4 them, as follows as to the First, Second and Third causes of action herein:

5 1. For the sum of \$25,000.00 paid on account of its Insured [REDACTED]  
6 [REDACTED] and for interest thereon at the legal rate from and after December 16,  
7 1999;

8 2. For costs of suit herein incurred; and,

9 3. For such other and further relief as the Court deems just and proper.

10 FURTHER, Plaintiff prays for Judgment against the Defendants PARADISE  
11 FORD and DOES 11 through 20, and each of them, as follows as to the Fourth cause of action  
12 herein:

13 1. For the sum of \$25,000.00 paid on account of its Insured [REDACTED]  
14 [REDACTED] and for interest thereon at the legal rate from and after December 16,  
15 1999;

16 2. For costs of suit herein incurred; and,

17 3. For such other and further relief as the Court deems just and proper.

18 Plaintiff hereby waives and remits any amount or relief in excess of that available in a  
19 limited civil case.

20  
21 L. JOSEPH POLINER, INC.  
22 A Professional Law Corporation

23  
24 By: 

25 L. Joseph Poliner  
26 Attorney for Plaintiff  
27  
28

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**EXHIBIT "A"**



March 2, 2000

Ford Motor Company, Inc.  
Parklane Towers West, Suite 400  
Three Parklane Blvd.  
Dearborn, MI 48126-2568

RE: Our Client: [REDACTED]  
Their Insured: [REDACTED]  
Claim No.: [REDACTED]  
Date of Loss: 8/24/1999  
Insured Vehicle: 1999 Ford Expedition  
Location of Loss: Eastbound 210 Freeway near Sunland, California

Dear Sir / Madam:

This law office has been retained by Reliance National Insurance Company pertaining to its subrogation claim against Ford Motor Company, Inc., for monetary damages sustained by virtue of the above-referenced vehicle fire in the present amount of \$32,452.00.

At the time of the subject vehicle fire, our client's insured, [REDACTED] was operating a 1999 Ford Expedition Eddie Bauer, vehicle identification number 1FMRU17L3X1 [REDACTED] ("the Insured Vehicle"), which he had leased from Paradise Ford and which we are informed and believe had been manufactured, sold and distributed by Ford Motor Company, Inc. Our client's investigation indicates that Ford Motor Company, Inc. is responsible for the above-referenced Insured Vehicle fire. It is our understanding that at the time of this fire, the Insured Vehicle had a defect or defects in its fuel system and/or exhaust system, and said defect or defects was the legal cause of the vehicle fire resulting in the damages due our client in the present amount of \$32,452.00.

YOU ARE HEREBY NOTIFIED that Ford Motor Company, Inc. has breached the express warranty that the above-described Insured Vehicle was merchantable, safely designed, and fit for the purposes for which it was designed, produced, sold, and intended and reasonably foreseeable to be used, which such express warranty was made or arising in connection with Ford Motor Company, Inc.'s manufacture, sale and distribution of the Insured Vehicle, which such Insured Vehicle was leased by Paradise Ford to our client's insured, [REDACTED] commencing on or about May 19, 1999. To the best of our understanding [REDACTED] address is [REDACTED] #K, Burbank, CA [REDACTED] and Paradise Ford's address is 2460 [REDACTED]

Ford Motor Company, Inc.  
March 2, 2000  
Page 2

Honolulu Ave., Montrose, CA 91026.

Therefore, YOU ARE HEREBY FURTHER NOTIFIED that in the event this office does not receive the above-stated amount of \$32,452.00 within ten (10) days from the date hereof, or if we do not receive a telephone call from Ford Motor Company, Inc. stating how and when payment shall be made, legal action will be instituted.

It is the policy of this office, in matters of this type, to allow the liable party to make payment of the amount of damages due prior to said amount being unnecessarily increased by court costs, attorney fees, and litigation expenses.

Very truly yours,

L. JOSEPH POLINER, INC.

By:

*LS/LAURIE CRAIN RIGG*  
Laurie Crain Rigg, Associate Counsel

LCR:pc

LAW OFFICES  
**L. JOSEPH POLINER, INC.**  
A PROFESSIONAL LAW CORPORATION

5933 WEST CENTURY BOULEVARD  
SUITE 1110  
LOS ANGELES, CALIFORNIA 90045  
(310) 670-1789

November 17, 2000

Thomas Bornecamp  
Attorney at Law  
YUKEVICH & SONNETT  
601 South Figueroa Street, 38<sup>th</sup> Floor  
Los Angeles, CA 90017

RE:

[REDACTED]  
vs. FORD MOTOR COMPANY

Court Case No. : 00C01295

Date of Loss : August 24, 1999

Our Insured : [REDACTED]

Dear Mr. Bornecamp:

Pursuant to our previous telephone conversations pertaining to the above matter and in accordance with your request, please find enclosed herewith the following documentation pertaining to the above matter, to wit:

1. Photostatic copy of James E. Hall & Associates, Inc.'s six-page fire investigative report pertaining to the subject matter of the above.
2. City of Los Angeles Fire Incident Report;
3. Photostatic copy of 31 photographs of property damage sustained to the Insured Vehicle; and
4. The Connectivity Company report on Ford Expedition recall fuel line assembly.

As indicated during our discussion, the remains of the subject vehicle are available for inspection as it has been garaged by our Client which continues to expend storage expense pertaining thereto.

Please advise by telephone call the dates on which your office is available for inspection of the vehicle and we will attempt to arrange a mutually and satisfactory date and time.

As discussed, your offices will voluntarily provide to this office, as the attorney for Plaintiff, all of the Defendant's Expert Reports, Investigative Reports and Fire Reports pertaining to the subject vehicle as the same are received.

PE04-078 C 3885

Thomas Borucamp, Esq.  
YUKEVICH & SONNETT  
November 17, 2000  
Page 2

Thank you for your continued cooperation in this matter.

Very truly yours,

L. JOSEPH POLINER, INC.

By:

A handwritten signature in black ink, appearing to read "Joseph Poliner", is written over a horizontal line. The signature is stylized and cursive.

LJP:cz  
Enclosures



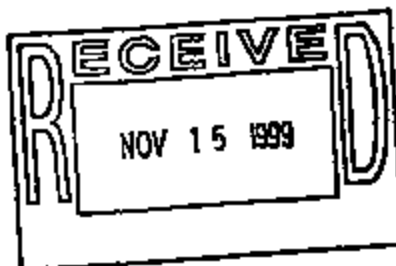
**JAMES E. HALL & ASSOCIATES, INC.**

P.O. Box 6362, Scottsdale, AZ 85261-6362 • (480) 860-1853 • Fax (480) 860-2251

**JIM HALL**  
CERTIFIED FIRE INVESTIGATOR

November 10, 1999

Ms. Trinh Hinson  
Reliance Personal Insurance  
2401 E. Katella Avenue  
Suite 330  
Anaheim, CA 92806



Re: Insured: [REDACTED]  
Vehicle: 1999 Ford Expedition  
Loss Location: 210 Freeway (eastbound near Sunland)  
Los Angeles, CA  
Date of Loss: August 24, 1999  
Claim No.: [REDACTED]

**INVESTIGATIVE REPORT**

In accordance with your request of October 20, 1999, I conducted an origin and cause investigation with reference to a fire involving a 1999 Ford Expedition insured by [REDACTED]. The vehicle was examined on October 27, 1999, at Howard Brown & Sons Auto Sales, [REDACTED] Sun Valley, CA [REDACTED].

The vehicle is a black 1999 Ford Expedition Eddie Bauer.

The vehicle was identified through Howard Brown & Sons' log number L9092816 which was found on the left front bumper of the vehicle.

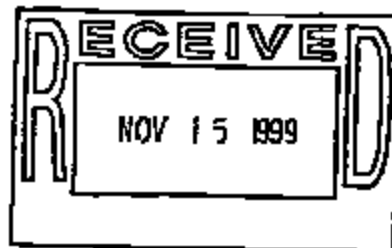
California license plate [REDACTED] expiring May 2000 was attached to the rear bumper.

The vehicle suffered varying degrees of fire and heat damage. The most extensive damage occurred in the engine compartment.

Ms. Trinh Hinson  
Re: Insured: [REDACTED]  
Vehicle: 1999 Ford Expedition  
Loss Location: [REDACTED]

Los Angeles, CA  
Date of Loss: August 24, 1999

Claim No.: [REDACTED]  
November 10, 1999  
Page 2



The most extensive damage to the exterior of the vehicle occurred at and immediately adjacent to the front fenders and hood. All of the paint on the front fenders and right front door had been consumed. Approximately 20% of the paint on the left front door had been consumed. The paint on the forward and central portions of the roof had been consumed. Fire damage to the right fender was significantly greater than the fire damage to the left fender.

The vehicle was equipped with four Firestone Wilderness AT P255/70R16 tires. The tires were mounted on Ford polished aluminum rims. The right front tire suffered the greatest degree of fire damage. Approximately 50% of the tire had been consumed. The left front tire also suffered a significant amount of fire damage. However, it was significantly less than that observed at the right tire. The left rear tire was intact, undamaged and unaffected by the fire. The right rear tire suffered varying degrees of fire and heat damage. Each tire exhibited a safe level of tread.

Examining the passenger compartment I found evidence of extensive fire and heat damage at and immediately adjacent to the dash. The wiring harnesses extending horizontally through the dash sustained sufficient temperatures to consume major portions of the protective insulation on the individual circuits. The individual circuits were found free of any evidence which would indicate abnormal or concentrated heating. The instrument cluster directly over the steering column suffered extensive fire and heat damage. I was unable to identify the odometer.

The fire and heat patterns in the dash are consistent with the fire extending into the dash area from the engine compartment through the natural openings in the firewall.

Ms. Trinh Hinson

Re: Insured: [REDACTED]

Vehicle: 1999 Ford Expedition

Loss Location: [REDACTED]

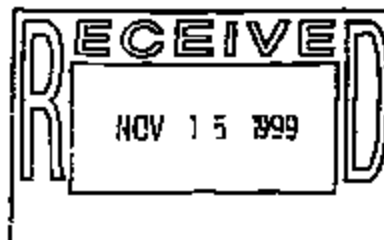
Los Angeles, CA

Date of Loss: August 24, 1999

Claim No.: [REDACTED]

November 10, 1999

Page 3



The front of the passenger compartment is equipped with two bucket seats which suffered extensive fire and heat damage. Approximately 10% of the foam cushion and material covering the seat were identified.

Moving front to rear into the central and rear portions of the vehicle, the level of damage decreased.

The engine compartment suffered extensive fire and heat damage. The aluminum hood over the engine compartment had almost totally melted. The V-8 gasoline engine suffered varying degrees of fire and heat damage. All major components associated with the engine were identified. The 12 volt battery was located in the right portion of the engine compartment. The battery casing had partially melted. The battery cables and connectors sustained sufficient temperatures to consume the protective insulation. The battery cables were free of any evidence which would indicate abnormal or concentrated heating.

The horizontal frame which extends above the engine firewall exhibits a distinct fire pattern demonstrating fire travel from right to left.

A wiring harness extends horizontally across the approximate center of the engine. The wiring harness sustained sufficient temperatures to consume the protective insulation exposing the individual copper conductors. The copper conductors were free of any evidence which would indicate abnormal or concentrated heating.

The engine oil was milky indicating the presence of water. The water probably entered the engine during fire suppression activities.

Ms. Trinh Hinson

Re: Insured: [REDACTED]

Vehicle: [REDACTED]

Loss Location: [REDACTED]

Los Angeles, CA

Date of Loss: August 24, 1999

Claim No.: [REDACTED]

November 10, 1999

Page 4



The aluminum throttle body is mounted at the top central portion of the engine. The throttle body housing had partially melted. The melt pattern on the throttle body demonstrates fire travel from right to left.

The main fuel line attaches to the left central portion of the "U" shaped fuel rail. The fuel travels through the fuel rail to the individual fuel injectors. The damage to the entire fuel rail and the fuel pressure regulator was extensive. All synthetic components had been consumed.

The alternator is located in the forward central portion of the engine. The alternator housing is constructed of aluminum. The right side of the aluminum housing had partially melted. The left side is almost totally intact.

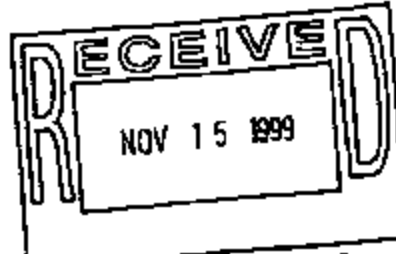
The fire and heat patterns in the engine compartment demonstrate the fire originated at the right side of the fuel rail. The probable source of ignition was the exhaust manifold located directly below the fuel rail.

The following interview was conducted on November 8, 1999:

[REDACTED]  
Apartment K  
Burbank, CA  
[REDACTED]



Ms. Trinh Hinson  
Re: Insured: [REDACTED]  
Vehicle: 1999 Ford Expedition  
Loss Location: [REDACTED]  
Los Angeles, CA  
Date of Loss: August 24, 1999  
Claim No.: [REDACTED]  
November 10, 1999  
Page 5



[REDACTED] leased the vehicle from Paradise Ford, 2400 Honolulu Avenue, Montrose, CA [REDACTED]. He stated that on the day of the fire he smelled the odor of gasoline while in the vehicle. He called Paradise Ford and advised the service department of the problem and requested they dispatch a tow truck to tow the vehicle to the service department. He stated the service representative advised him to drive the vehicle to the service department in spite of the obvious gasoline leak. [REDACTED]

[REDACTED] had been driving the vehicle for approximately 10 minutes and was approaching the 210 freeway. As he slowed the vehicle, the engine compartment burst into flames.

[REDACTED] stated that at the time of the fire the vehicle odometer read between 2,000 and 3,000 miles.

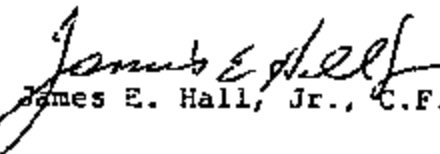
#### CONCLUSION

After a thorough examination of the vehicle and based on the above, I determined the fire originated in the engine compartment at or immediately adjacent to the right side of the fuel rail. Gasoline leaked from the fuel rail and was probably ignited as it came in contact with the exhaust manifold. All other potential ignition scenarios and causes for the fire were explored and eliminated.

The conclusions and opinions herein are based on evidence and information available to me as of this writing. It is conceivable that additional information may become known which bears on these conclusions and opinions. The right is reserved, therefore, to review and modify my conclusions and opinions at any time.

Ms. Trinh Hinson  
Re: Insured: [REDACTED]  
Vehicle: 1999 Ford Expedition  
Loss Location: [REDACTED]  
Los Angeles, CA  
Date of Loss: August 24, 1999  
Claim No.: [REDACTED]  
November 10, 1999  
Page 6

Attached to this report are 31 photographs and a copy of a diagram of the emission system, fuel system and manifold.

  
James E. Hall, Jr., C.F.I.

Attachments  
JEH:tmh

DATE 10/14/99

CITY OF LOS ANGELES

FIRE DEPARTMENT

FIELD INCIDENT REPORT

LOS ANGELES CITY  
FIRE DEPARTMENT  
**OFFICIAL  
DOCUMENT**  
SECTION  
OF RECORDS

INCIDENT NUMBER: 0783  
EXPOSURE NUMBER: 000  
INCIDENT DATE: 08/24/99

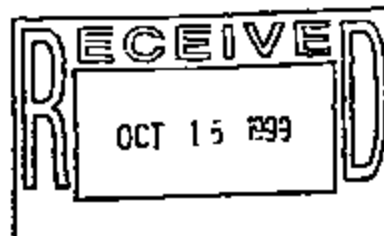
TIME OF ALARM: 1843  
INCIDENT LOCATION: EB 210 FY X SUNLAND BL

FLOOR OF ORIGIN:  
OWNERS NAME:  
CORPORATION:  
OCCUPANTS NAME:  
DOING BUSINESS AS:

TYPE OF INCIDENT: FIRE MOBILE PROP OUTSIDE STRUCTURE  
PROPERTY USE: ROAD OR PARKING AREA  
ORIGIN OF FIRE: ENGINE, GEAR, WHEEL AREA  
FORM OF HEAT: HEAT FROM LIQUID FUELED EQUIPMENT  
IGNITION FACTOR: FLAMMABLE LIQUID SPILL  
MATERIAL 1ST IGNITED  
TYPE: GASOLINE  
FORM: FUEL, GAS TANK

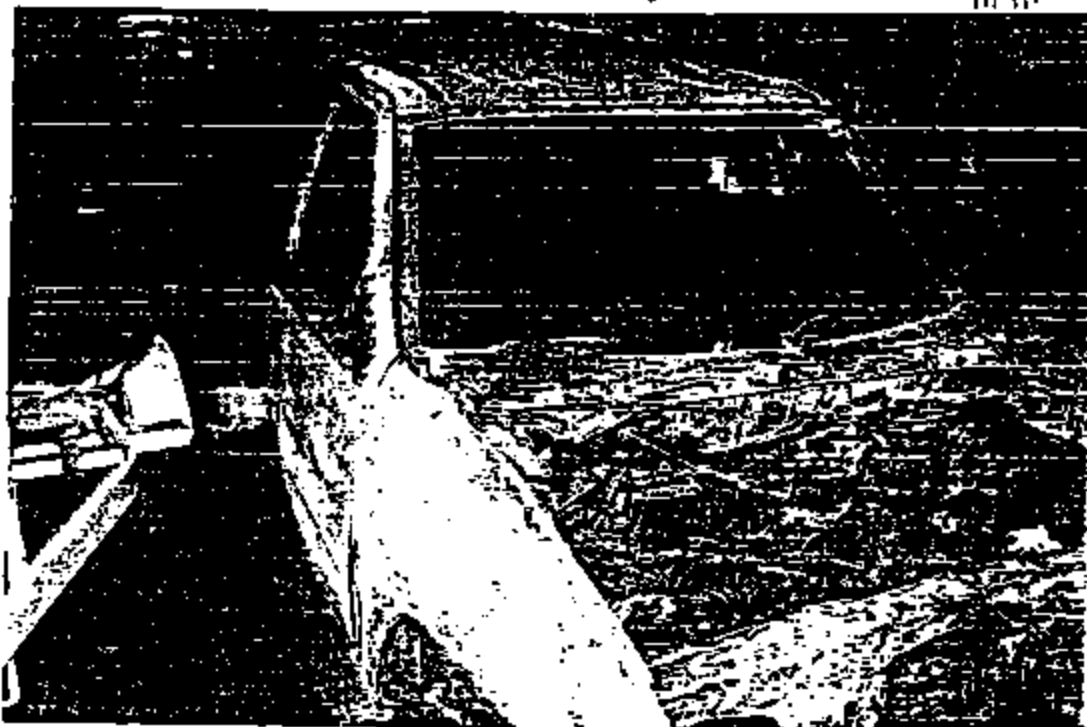
MOBIL EQUIPMENT: AUTOMOBILE  
MAKE FORD LIC/VIN  
EST PROPERTY LOSS: 25,000  
EST CONTENT LOSS:

INFORMATION CONTAINED IN THIS REPORT IS INTENDED FOR THE SOLE USE OF THE LOS ANGELES FIRE DEPARTMENT. ESTIMATIONS AND EVALUATIONS MADE HEREIN REPRESENT 'MOST LIKELY' AND 'MOST PROBABLE' CAUSE AND EFFECT. ANY REPRESENTATION AS TO VALIDITY OR ACCURACY OF DATA CONTAINED IN THIS REPORT, EXCEPT WHERE IT PERTAINS TO THE STATISTICAL DATA BASE OF THE CITY OF LOS ANGELES, IS NEITHER INTENDED OR IMPLIED.



PE04-078 C 3873



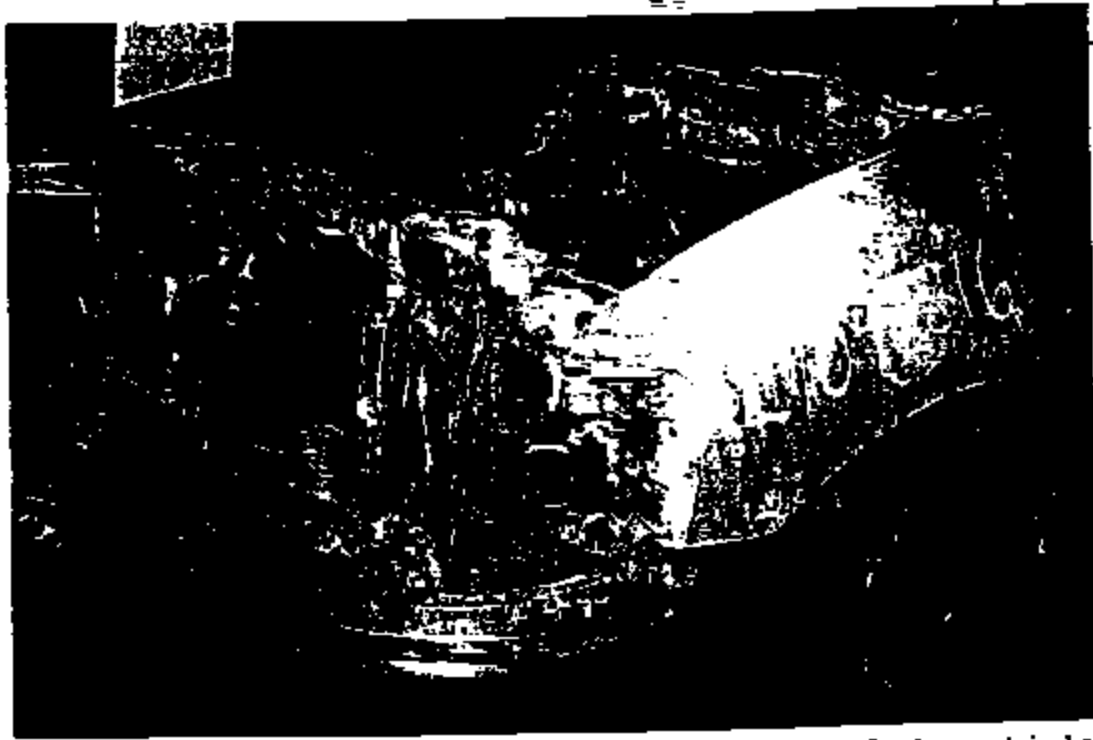


41 View looking toward the front and right side of the vehicle.

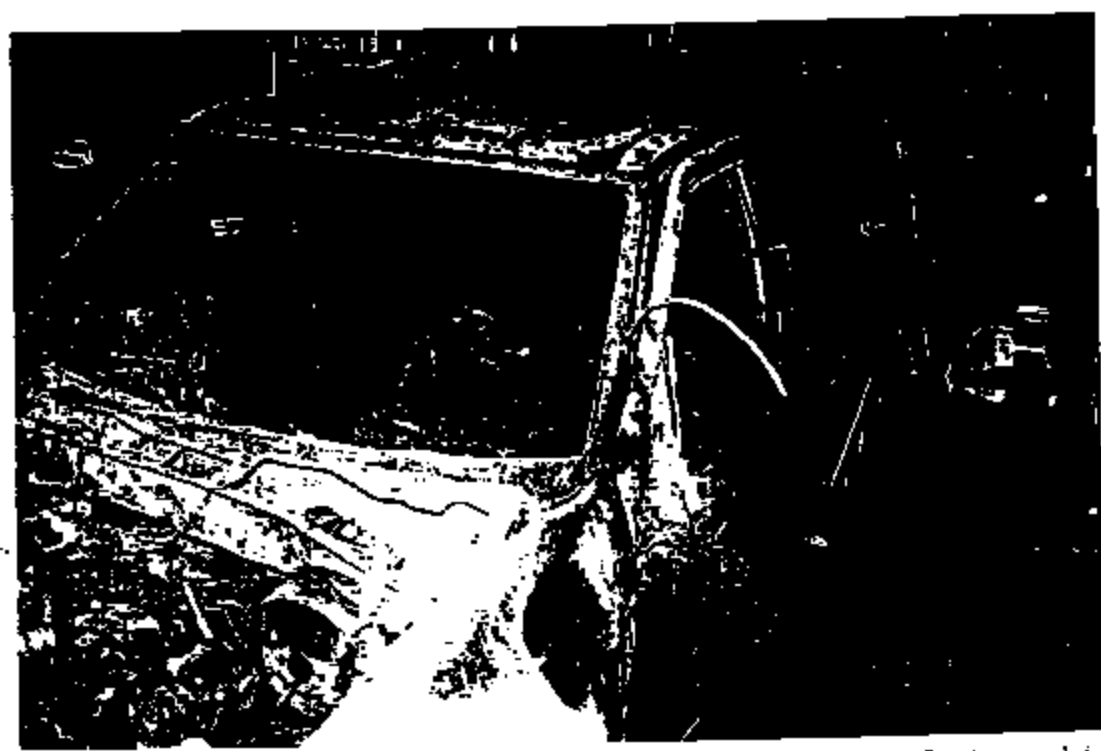


42 View looking toward the front and left side of the vehicle.

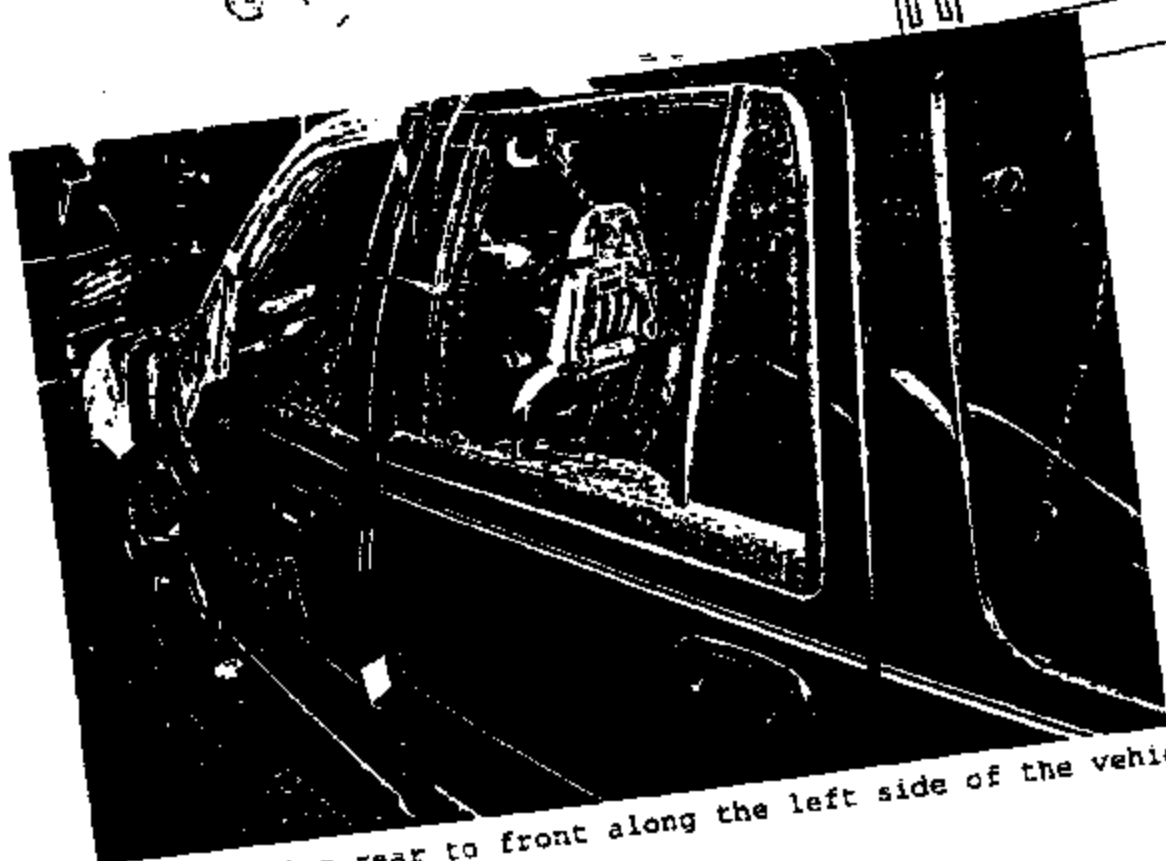
RECEIVED  
FEB 19 1964



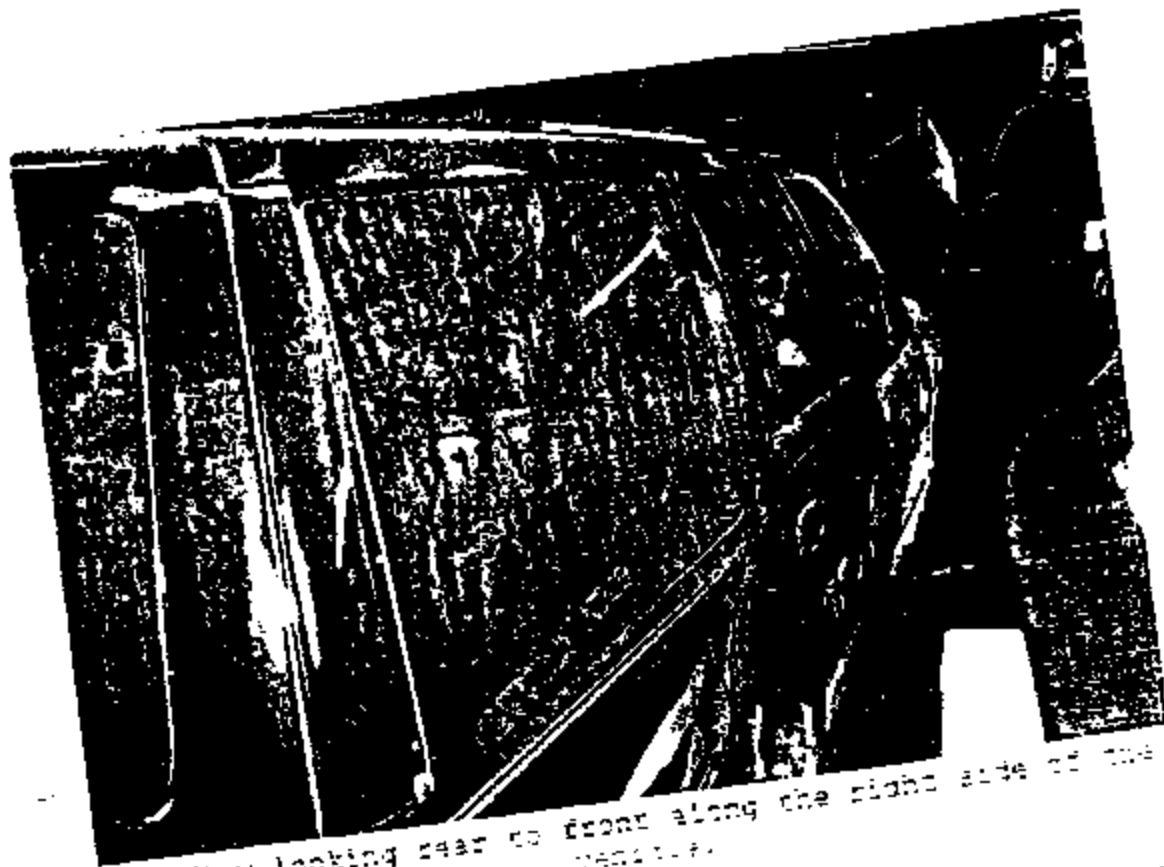
#3 View looking toward the left front corner of the vehicle.



#4 View looking front to rear along the left side of the vehicle.



43 View looking rear to front along the left side of the vehicle.



44 View looking rear to front along the right side of the vehicle.



#7 View looking toward the rear of the vehicle.



#8 View looking toward the left front fender of the vehicle.





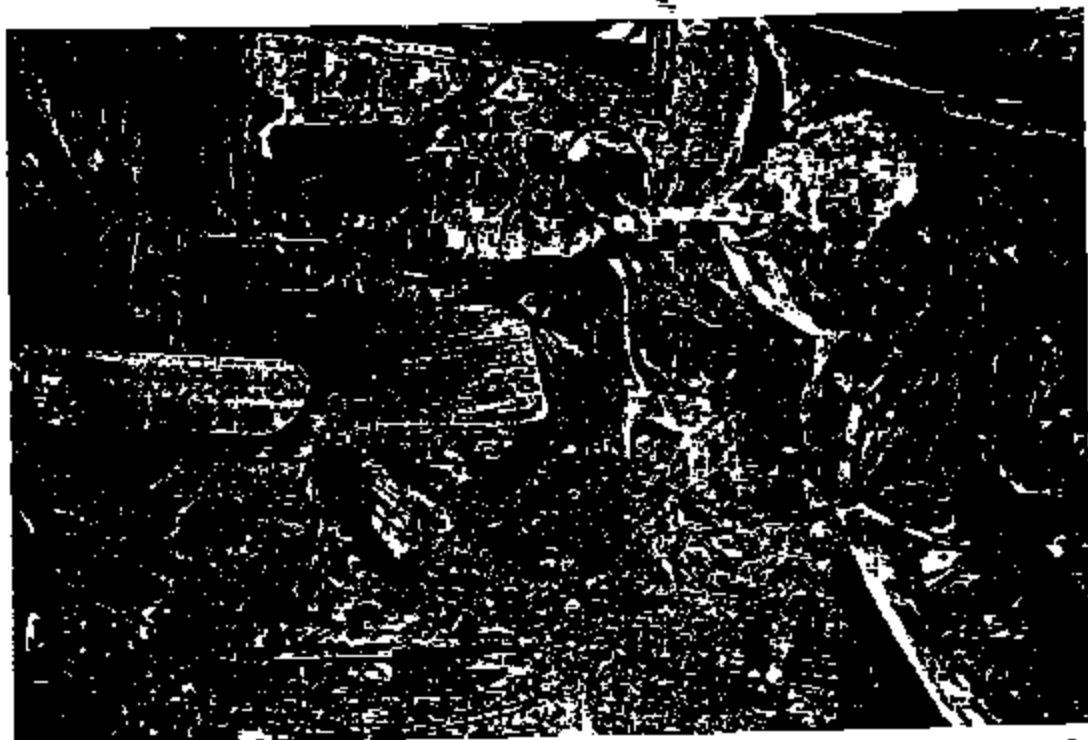
RECEIVED  
JUL 16 1953



#11 View looking toward the right rear wheel well.



#12 View looking toward the right and central sections of the dash.



#13 View looking right to left through the forward portion of the passenger compartment.



#14 View looking front to rear through the passenger compartment.



#15 View looking right to left across the dash.



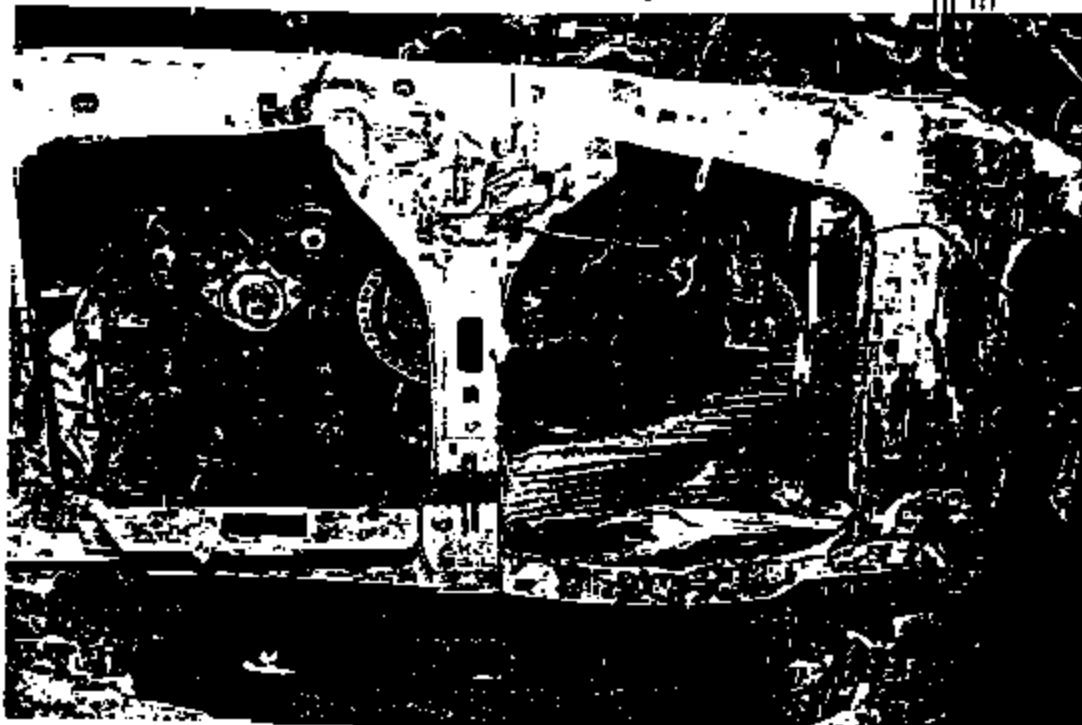
#16 View looking toward the wiring harness in the approximate center of the dash.



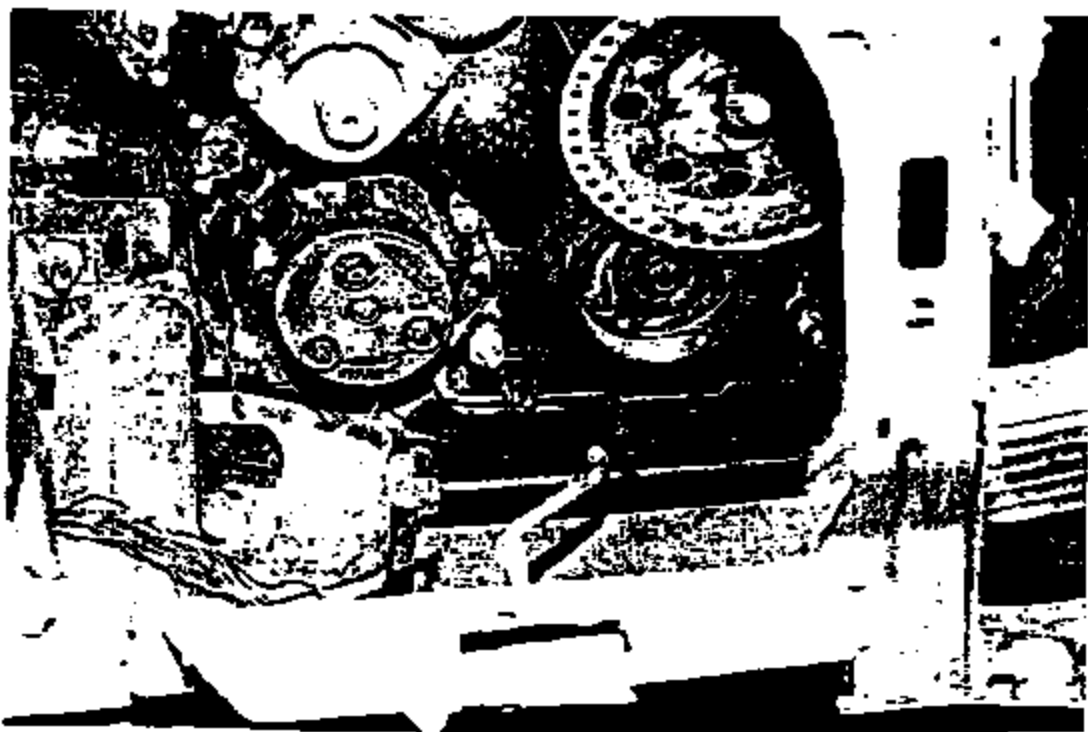
47 View looking right to left through the central portion of the passenger compartment.



48 View looking left to right through the central portion of the passenger compartment.

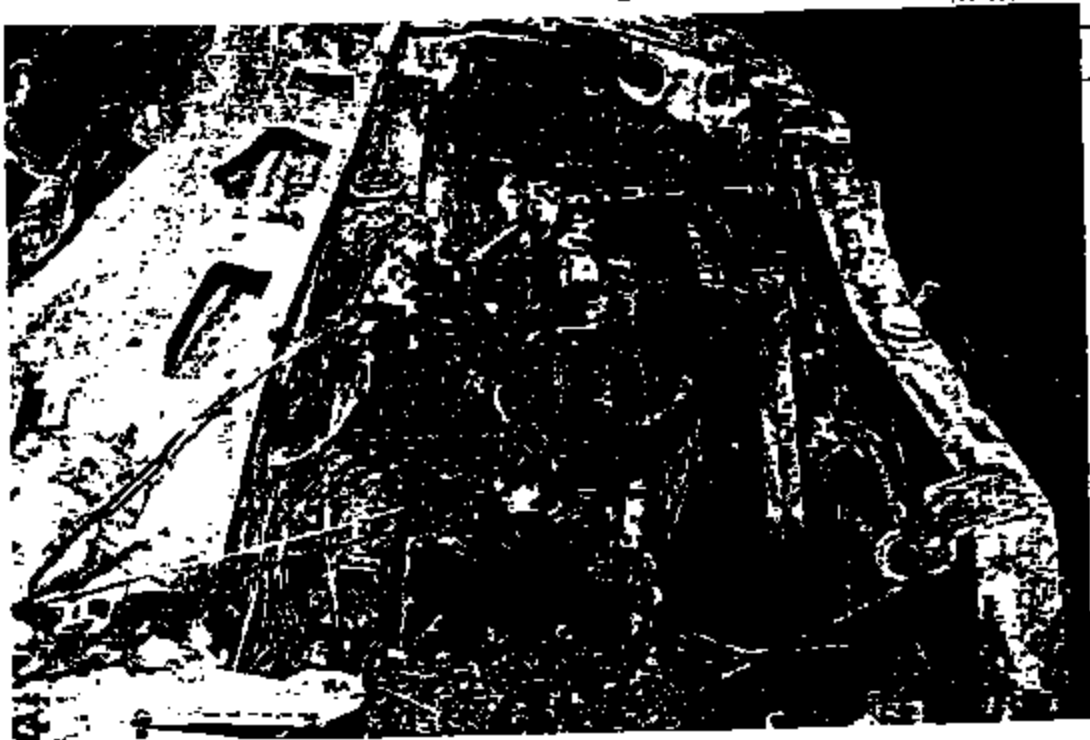


#19 View looking front to rear through the grill area.

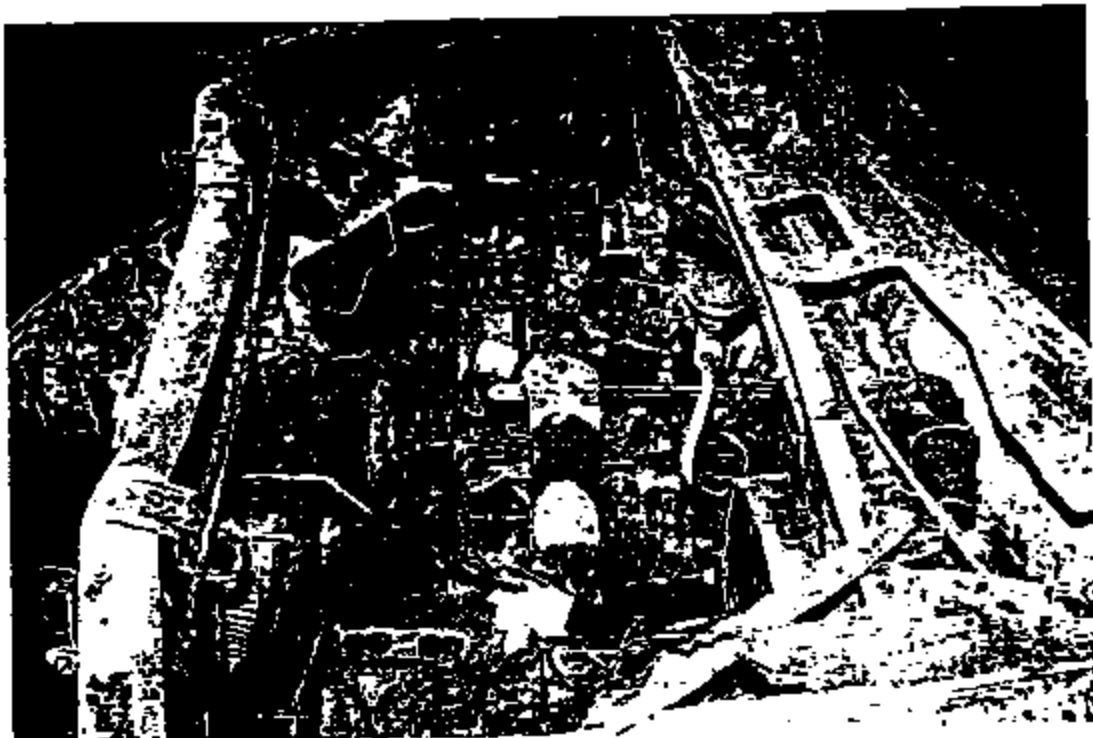


#20 View of grill area from rear looking forward.

PE04-878 C 3884

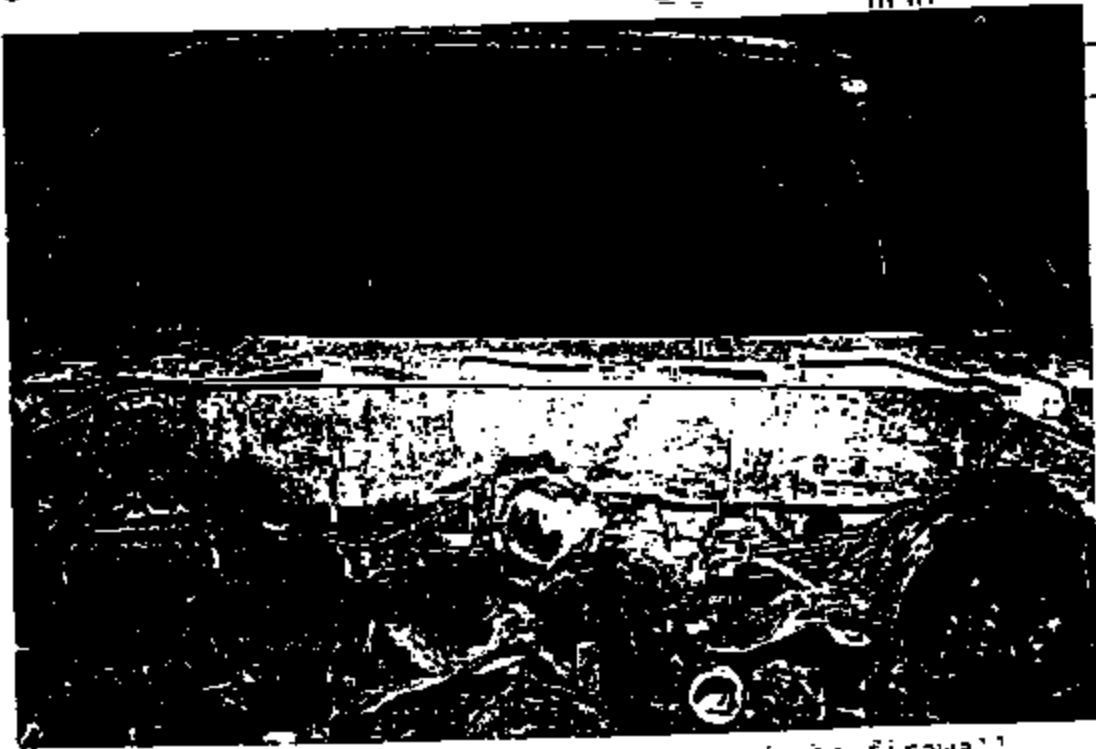


\*31 View looking right to left across the engine compartment.

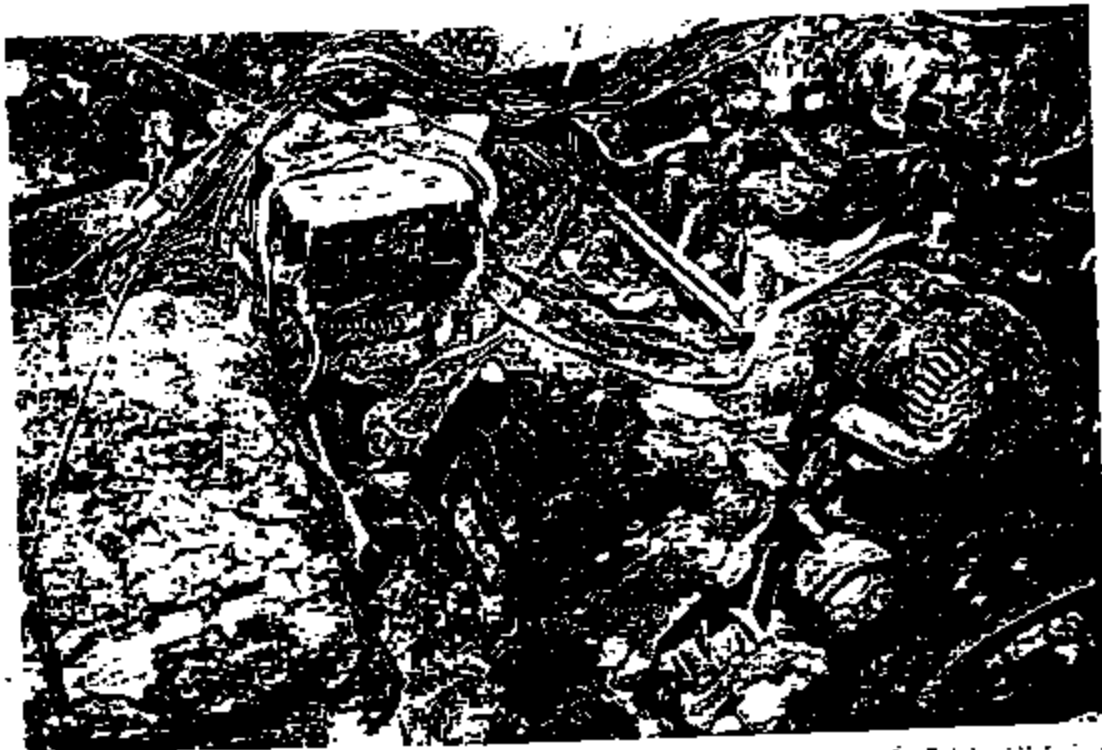


\*32 View looking left to right across the engine compartment.

NOV 1 1954



#23 View looking front to rear toward the firewall.



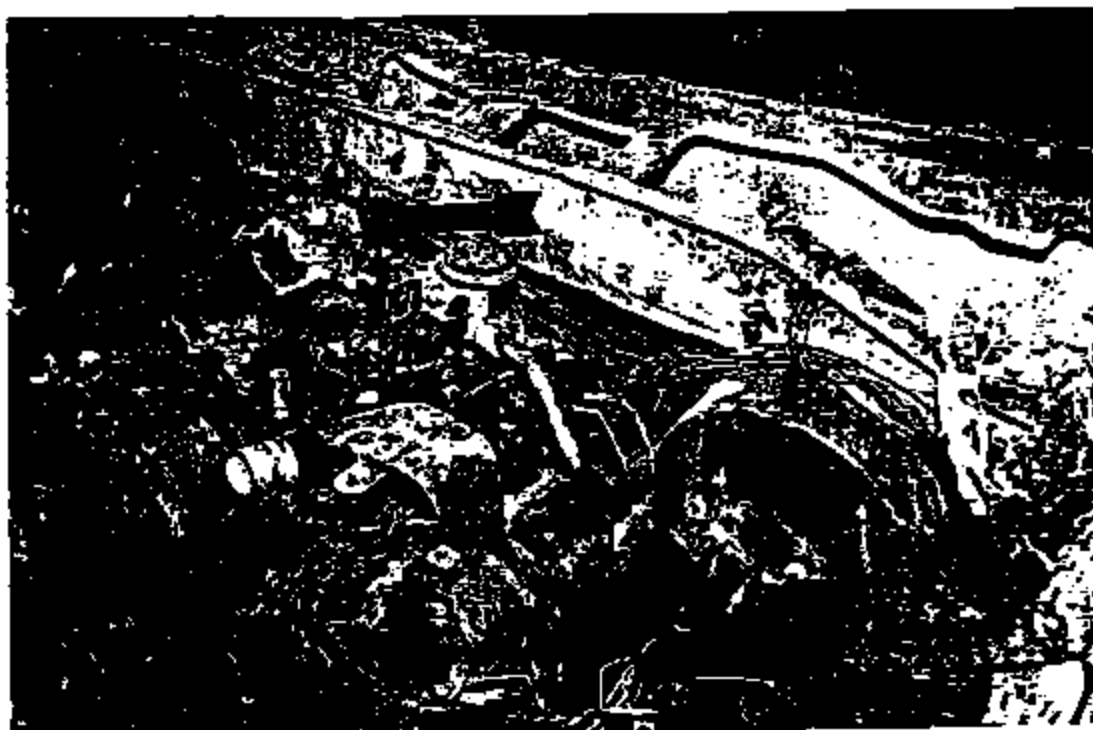
#24 View looking from right rear corner of the engine compartment.

PE84-078 C 3886





#25 View looking toward the left rear corner of the engine compartment.



#26 View looking toward the left side of the engine compartment.



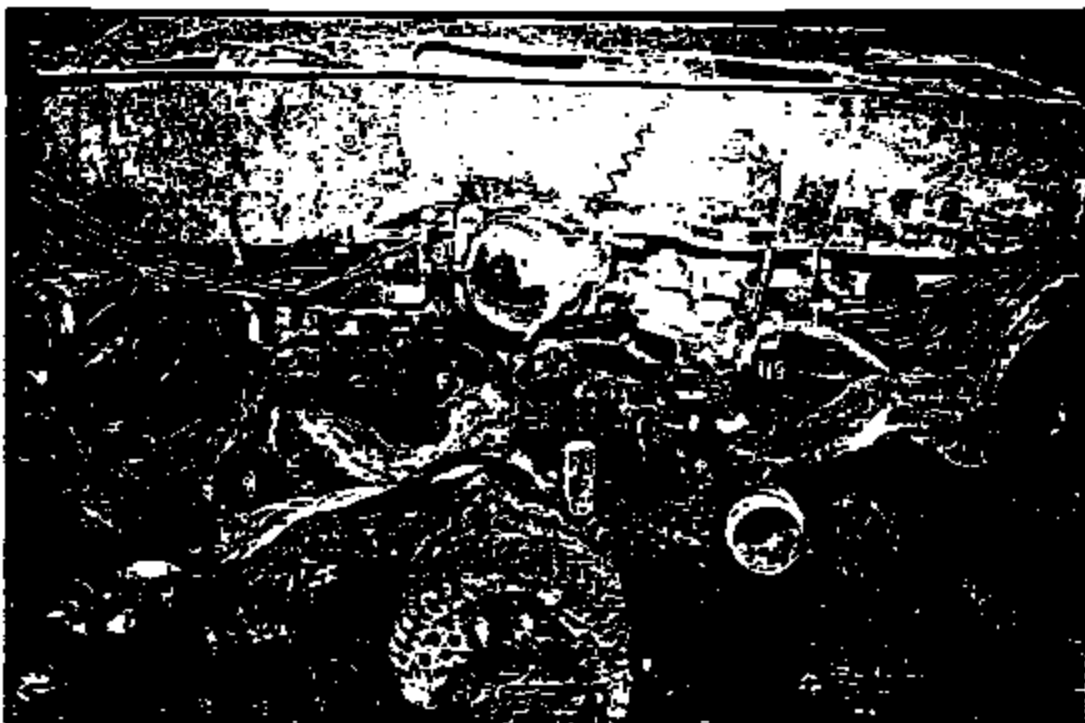
#27 View looking toward the left forward corner of the engine.



#28 View looking toward the exhaust gas recovery filter.



429 View looking toward the exhaust gas recovery lines.



View looking toward the throttle body and the heat exchanger  
the A-10 engine. Some of the fuel lines.



#31 View looking toward the throttle body.

