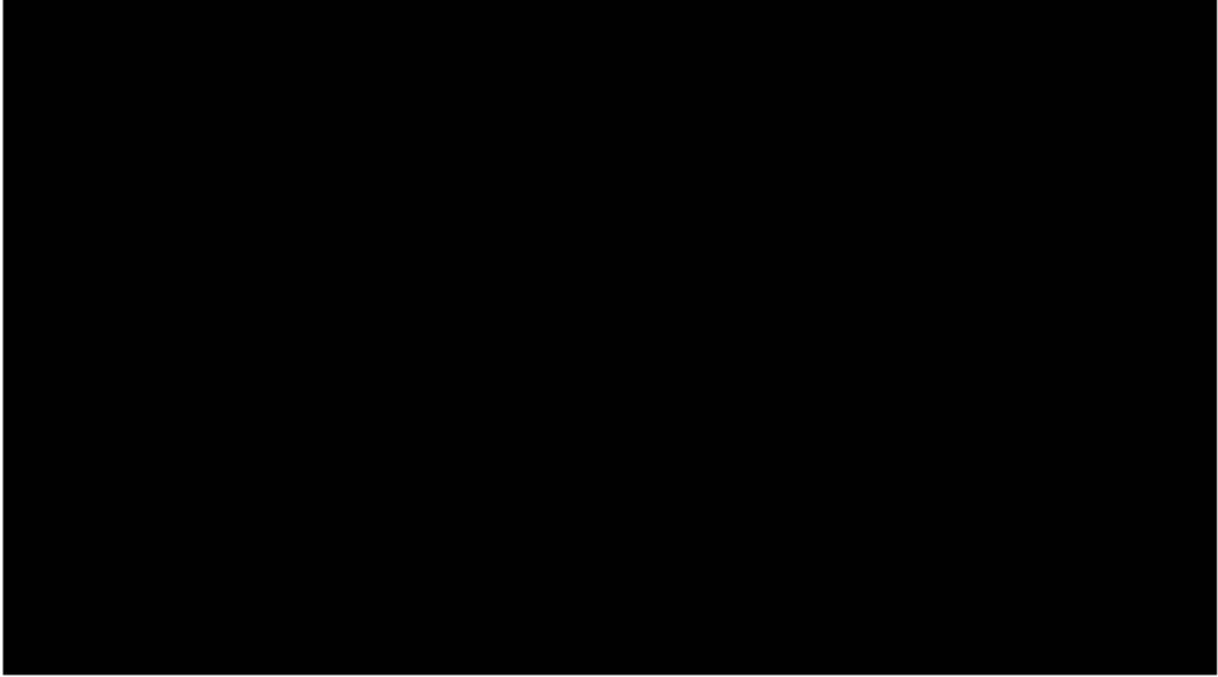


PE04-078
FORD
1/28/2005
ATTACHMENT F
BOOK 10 OF 12
PART 2 OF 6





**GRAIN DEALERS MUTUAL
INSURANCE COMPANY**

P.O. BOX 1747 • INDIANAPOLIS, INDIANA 46206-1747 • PHONE 317-427-2453 • 800-428-7081
WEBSITE: www.graindealers.com

9/16/2004

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

RECEIVED SEP 20 2004

RE: [REDACTED]
Claim Number: [REDACTED]

Dear Mr. Norton:

I have your letter of 9/13/04. You were put on notice of this case 6/15/04. You did make an appointment to see Mr. Dallas and Mr. Vaughn, however no one bothered to show up. We then received your demand of 7/1/04. We have no reports at this time, as the investigation is not complete. We have copies of the photos for you - if and when you do bother to show up.

In order to complete our investigation, we do need to do destructive testing which includes taking the front end of this vehicle apart to tell what exactly caused the fire. You do have enough time to contact Dave Dallas and arrange to have your expert there too. We would welcome your involvement.

We do plan to proceed as of the first week of October. We can both waste time on attorneys or we can work together to figure this out - your choice.

Sincerely,


Faye E. Kosa, AIC

CC: Dallas & Assoc.

JMA Investigations

Ron Vaughn

CC: Mort Welch, Attorney EMI

Nancy Bagley

PEBA-878 C 4134



STATEWIDE CLAIMS & INVESTIGATIONS, INC.

405-723-0874

FAX # 405-895-7119

12000 Castle Creek Circle
Oklahoma City, OK 73165

Prompt Professional Service

June 15, 2004

FORD MOTOR COMPANY
RECEIVED
CLAIMS UNIT
JUN 23 2004
OFFICE OF THE
GENERAL COUNSEL

RECEIVED
SECTION

JUN 21 11:52

FORD MOTOR COMPANY CONSUMER AFFAIRS
P. O. BOX 6248 MD-3NE-B
DEARBORN MI 48126

Re: Ford Expedition, VIN 1FMRU176175 [REDACTED]
Our Insured: [REDACTED]
Policy #: AH-041504, GRAIN DEALERS MUTUAL INSURANCE COMPANY
Claim #: [REDACTED]
Date/Loss: 05-28-04
Our File #: SW2282RV-F

Dear Sir or Madam:

Grain Dealers Mutual Insurance Company is pursuing its rights to subrogation as a result of a claim being filed on the above captioned policy.

It has been determined that a 1999 Ford Expedition is the probable cause of a fire which destroyed a single family dwelling and all personal property contents. The vehicle was parked in the garage.

Grain Dealers Mutual Insurance Company is extending an invitation for a Ford Motor Company representative to be present when our technicians examine the vehicle. You may also examine the dwelling and contents for verification.

It is imperative that you contact us as soon as possible so you can make an inspection before the dwelling is demolished in compliance with city codes. The vehicle and dwelling are both insured by Grain Dealers Mutual Insurance Company.

Please contact Dave Dallas at: DALLAS & ASSOCIATES, INC.
923 72nd. Ave. S.E.
Norman, OK 73026
(405)329-3602
(405-329-3605 FAX

Sincerely,

Ron Vaughan
Ron Vaughan, Claims Representative
STATEWIDE CLAIMS & INVESTIGATIONS, INC.

RY:av

cc: Grain Dealers Mutual Ins. Co.

cc: Nort Welch, Attorney at Law
6440 Avondale Dr., Suite 206
Oklahoma City, OK 73116

cc: Dallas & Associates, Inc.

*Scene no longer available - 5/28/04
- '99 Exped.
- VIN*



MEADOWS & ASSOCIATES, L.L.P.

A REGISTERED LIMITED LIABILITY LAW PARTNERSHIP

Attorneys and Counselors at law

Main Office: 1413 E. McKinney St., Denton TX 76209
Telephone: 940.566.0022 OR 817.745.1550

FAX: 940.566.5745 OR 817.745.1551
Email: lm@meadowallp.com

October 20, 2004

Chacon Autos Ltd.
4320 Russ Ave.
Dallas, Texas 75204

By Certified Mail
Return Receipt Requested
#7004 0750 0001 9039 7822

Ford Motor Company
CT Corp Systems
350 N. St. Paul
Dallas, Texas 75201

By Certified Mail
Return Receipt Requested
#7004 0750 0001 9039 7839

Re: Notice of Claim, Texas Deceptive Trade Practices Act (DTPA)

To Whom It May Concern:

Please be advised that I have been engaged to represent Melinda Vizcarra regarding the above-referenced matter.

On or about August 4, 2004, [REDACTED] was driving her 1999 Ford Expedition, VIN# 1FMRU17L7XI [REDACTED] with her infant child, her partially disabled mother, and her elderly grandmother in the vehicle as passengers. After noticing smoke, [REDACTED] pulled over and the vehicle burst into flames. [REDACTED] and her passengers narrowly escaped injury. The vehicle was purchased from Chacon Autos Ltd. The fire totaled the vehicle.

In connection with the conduct and/or omissions described above, you committed the false, misleading or deceptive practices as indicated below, in that you:

- (a) knowingly made false or misleading statements of fact concerning the need for parts, replacement, or repair service;
- (b) represented that a guarantee or warranty confers or involves rights or remedies which it does not have or involve;
- (c) represented that work or services have been performed on, or parts replaced in, goods when the work or services were not performed or the parts replaced; and
- (d) failed to disclose information concerning goods or services which was known at the time of the transaction with the intention to induce the consumer into a transaction into which the consumer would not have entered had the information been disclosed.

We also contend that the following warranties were breached and therefore actionable under the Texas Deceptive Trade Practices - Consumer Protection Act:

- (a) the implied warranty of fitness for a particular purpose; and
- (b) the implied warranty of merchantability.

Notice is hereby given under Section 17.505 of the Texas Deceptive Trade Practices - Consumer Protection Act that my client has sustained economic damages in the amount of \$13,000, damages for mental anguish in the amount of \$10,000, and attorney's fees of \$400 reasonably incurred by my client in the assertion of this claim, for a total amount of \$23,400.00. Demand is therefore made pursuant to the DTPA for the amount of \$23,400.00 in the form of a money order or cashier's check, payable to "Meadows & Associates, LLP, Trustee."

If payment to my client in the total amount of \$23,400.00 as requested hereinabove is not forthcoming within the time provided by law, suit will be filed in a court of competent jurisdiction.

Please be advised that under the DTPA an award of court costs and reasonable and necessary attorney's fees is mandatory to a consumer who prevails in such a lawsuit. Please be further advised that damages for mental anguish and up to three times the amount of economic damages may be awarded at trial in the event that the trier of fact finds that actionable conduct was committed "knowingly." If the conduct is found to have been committed "intentionally," my client could recover up to three times the amount of damages for both mental anguish and economic damages.

I urge you to give this matter your immediate attention.

Sincerely,

Meadows & Associates, L.L.P.



By: Kelly C. Gent,
For the Firm

KCG

cc: client



LAW OFFICES OF
ROY A. POLLACK
503 WEST 14TH STREET
AUSTIN, TEXAS 78701

TELEPHONE (512) 472-6381
FACSIMILE (512) 499-8203

October 23, 2002

Via certified mail R.R. # 7001 1140 0001 0559 0460

Ford Motor Company
ATTN: Maria Quintern-Salvo
Parklane Towers West, Suite 300
Three Parklane Blvd.
Dearborn, MI 48126-2568

Via facsimile transmission (512) 345-6558

Covert Ford

ATTN: [REDACTED]

Austin, TX [REDACTED]

RE: Claimant: [REDACTED]
D/L: February 18, 2002

To Whom It May Concern:

Please be advised that we have been retained as legal counsel to represent [REDACTED] with respect to your breach of contractual, statutory, and ethical obligations pertaining to the sale/purchase of the above-referenced vehicle. All further communications regarding this matter should be directed to the undersigned.

We have previously corresponded with [REDACTED] on or about May 30th and June 17th, with no results (see attached).

To specifically answer the questions posed in Ford Motor Company's letter dated September 20, 2002, please review the following responses:

- 1) The date of the incident was February 18, 2002, in Taylor, Texas;
- 2) On or about February 18, 2002, [REDACTED] Ford F150 caught on fire in front of his house. Consequently, the truck was declared a total loss. Additionally, [REDACTED] residence was badly damaged and he sustained damages/losses to numerous personal items in the house and in the truck;
- 3) We do not currently have in our possession a police and/or fire report;
- 4) We do not currently have the information regarding the mileage of the vehicle. Please feel free to contact Brian Wood, Heritage Claims Service, at (800) 737-2838, Ext. 1222;

Taylor, TX
100 F-150

- 5) We do not currently have expert original color photos available for your inspection. Please feel free to contact Brian Wood, Heritage Claims Service, at (800) 737-2838, Ext. 1222;
- 6) Please feel free to contact Brian Wood, Heritage Claims Service, at (800) 737-2838, Ext. 1222, for the alleged defect(s). They ruled out the possibility that [REDACTED] contributed to the incident;
- 7) Regarding the alleged defect documentation, please feel free to contact Brian Wood, Heritage Claims Service, at (800) 737-2838, Ext. 1222;
- 8) The defective part(s) have not been repaired or replaced because the vehicle was appraised as a total loss;
- 9) For the present location of the vehicle, please feel free to contact Brian Wood, Heritage Claims Service, at (800) 737-2838, Ext. 1222;
- 10) The total loss worksheet is in the possession of Brian Wood, Heritage Claims Service, at (800) 737-2838; Ext. 1222; and
- 11) It is not believed that there were any market additions or modifications made to the vehicle.

This letter constitutes formal demand and notice pursuant to the Deceptive Trade Practices—Consumer Protection Act of the State of Texas ("DTPA").

Our client is a consumer within the meaning of the DTPA and his claim arises out of the transactions described herein. [REDACTED] purchased a vehicle from your company, in reliance upon your representations and warranties, whether express or implied, and upon other written and/or oral agreements by and between you, your company, and [REDACTED]

On or about the year 2000 [REDACTED] purchased a new, 2000 Ford F150 from Covert Ford, in Austin, Texas. He purchased the vehicle to be used as his sole means of transportation and to utilize as an important tool in his profession —he works as an independent maintenance/repair man. Accordingly, ordinarily his truck is loaded with various tools and equipment.

On or about February 18, 2002 [REDACTED] Ford F150 caught on fire in front of his house, in the early evening. Consequently, the truck was declared a total loss. Additionally, [REDACTED] residence was badly damaged by the fire and he sustained damage/losses to numerous personal items in the house and in the truck.

It has cost [REDACTED] needless time, energy, and money due to the loss of his vehicle. Your deceptive sale of this truck has placed [REDACTED] in a difficult financial situation. Note that you are being held responsible for the costs related to this vehicle, any money paid out-of-pocket for the replacement vehicle, any losses incurred as a result of this incident, and the time [REDACTED] wasted in connection with doing business with your company, and his mental anguish. Attached is [REDACTED] handwritten list that sets out all of the items destroyed in the fire: 1) in his truck, and 2) in his house.

Due to your acts and omissions, our client has been required to engage the services of the undersigned attorney and has agreed to pay reasonable fees for legal services rendered. The reasonable and necessary costs to date are \$1,500.00.

In as much as this claim is presented under the DTPA of the State of Texas, we encourage you to take this letter to your attorney immediately to advise you concerning your rights, privileges, duties, and obligations under said act and under the transactions which are the subject of this letter. By mere passage of time, valuable rights may be waived by you which are irretrievable.

At this time, our client will accept the following as full restitution:

- 1) Replacement or payment in full for each and every item destroyed that was located in the truck as a result of the fire;
- 2) Replacement or payment in full for each and every item destroyed in the house as a result of the truck's fire;
- 3) Any and all other out-of-pocket expenses incurred as a result of this incident; and
- 4) Attorney's fees.

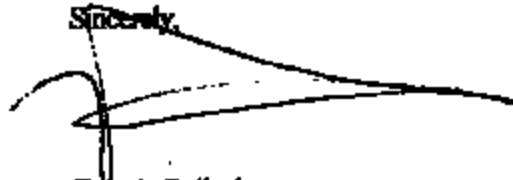
This settlement only seeks estimated, actual "out-of-pocket" damages, and relieves you of any additional compensation to which our client is entitled, including punitive damages.

As you know, Ford Motor Company has a great deal more at stake here than just [REDACTED] situation. [REDACTED] prevails in court, he will likely receive actual damages in addition to exemplary damages. Additionally, the negative publicity which a suit of this nature would elicit, could be devastating to Ford Motor Company's business. Furthermore, it is our opinion that Ford Motor Company has no reasonable defense for this incident, which will hardly call for jury sympathy or understanding. Ford has caused a great deal of trouble for the type of person they pride themselves in servicing—the working man.

We suggest you begin to make efforts to resolve this matter immediately. However, if this matter is not completely resolved within sixty (60) days from the date of receipt of this letter, we will advise our client to file a lawsuit against you in a court of competent jurisdiction. In such a suit, our client will be entitled to recover actual damages, punitive (treble) damages, and attorney's fees.

Finally, the above will not preclude our client, in any lawsuit filed, from also alleging and suing under other legal theories to which he is entitled, in addition to a cause of action under the DTPA.

Sincerely,



Roy A. Pollack
Law Offices of Roy A. Pollack

cc: [REDACTED]

August 21, 2002



Ford Motor Co.
Consumer Affairs
Litigation Prevention
P.O. Box 43358
Detroit, MI 48243

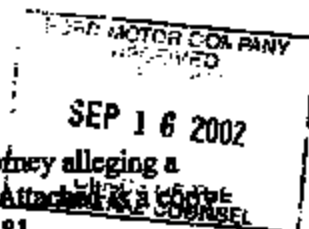
CONSUMER AFFAIRS
SECTION

2 AUG 28 A7:01

Re: Our Claim #: [REDACTED]
Insured: Covert Ford Inc.
Claimant: Randy Winters
D/L: 2-18-02

Gentlemen:

Please be advised that we have received notice from [REDACTED]'s attorney alleging a product defect in his 2000 Ford F150 VIN: 1FTCR10A4V [REDACTED]. Attached is a copy of Attorney Roy A. Pollack's letter. He can be reached at 512-472-3381.



At this time, on behalf of our insured Covert Ford Inc., we hereby tender this claim to Ford Motor Co. for further handling.

Please acknowledge receipt and acceptance of this tender.

Sincerely,

Jose A. Falcon
Adjuster
800-392-7805 x3912

cc: Mr. Buddy Hagman
Covert Ford Inc.
11514 Research Blvd.
Austin, Texas 78750

Houston Commercial Claim
450 Gears Road, Suite 400
Houston, TX 77067-4585
Mailing Address: P.O. Box 4364
Houston, TX 77210-4364
Telephone 281 877 3200
Toll Free 800 392 7805

PEB4-876 C 4143

LETTERHEAD OF
ROY A. POLLACK
503 WEST 14TH STREET
AUSTIN, TEXAS 78701

TELEPHONE (512) 458-8301
FACSIMILE (512) 458-8203

May 30, 2002

VIA FACSIMILE TRANSMISSION (512) 458-6658

Covert Ford
ATTN: Joe Caradonna
Austin, Texas

RE: [REDACTED] 2000 Ford F150; DFL February 18, 2002

Dear Mr. Caradonna:

I represent [REDACTED]. Per our conversation, I am writing you to notify you of a situation that could result in a lawsuit. Therefore, I want to give you an opportunity to inspect the primary piece of evidence [REDACTED] 2000 Ford F150.

On or about February 18, 2002, [REDACTED] Ford F150 caught on fire in front of his house. Consequently, the truck was declared a total loss. Additionally, [REDACTED] residence was badly damaged and he sustained damages/losses to numerous personal items in the house and in the truck.

[REDACTED] insurance company, Old American County Mutual, agreed to pay off the remaining note on the truck after conducting an investigation as to the cause of the fire, i.e. they ruled out the possibility that [REDACTED] caused the fire and the consequential damages. Next, [REDACTED] purchased another truck from Covert-Ford.

Note that [REDACTED] insurance only covers the damages to the truck. Hopefully, Ford will also responsibility for all of the items damaged other than the truck, as a result of the fire. If not, then litigation will probably ensue.

As stated, [REDACTED] insurance company (and/or their adjuster, Heritage Claims Services) has already conducted their investigation regarding the truck. I am writing to request that you immediately send someone to conduct an investigation regarding the cause of the damage to the vehicle to determine liability and to preserve Ford's position regarding this matter. [REDACTED] insurance company needs to be able to exercise custody and control over the vehicle before they will pay off the note. This includes taking control of the vehicle for salvage purposes and most likely, forever altering the truck's current status.

Arrangements for inspection of the vehicle need to be made through Brian Wood, Heritage Claims Service, at (800) 737-2838, Ext. 1232. The truck is currently located at Covert Auto Auctions.

cc: 06/03/02-07

Nolan Brumfield

Lot # [REDACTED]

11



State Farm County Mutual Insurance Company of Texas



January 13, 2003

Ford Motor Co.
Parklane Towers West Suite 400
3 Parklane Blvd.
Dearborn, MI 48126-2568

LEAGUE CITY SERVICE CENTER
P.O. BOX 9008
401 LANDING BLVD.
LEAGUE CITY, TX 77574-9006
FORD MOTOR COMPANY
RECEIVED (281) 338-7500
(800) 272-1880

JAN 17 2003

RE: Claim Number: [REDACTED]
Date of Loss: November 28, 2002
Our Insured: [REDACTED]

Dear Sirs:

The identified 1999 Ford F-150 Lariat, 1FTRK07W6X[REDACTED] is insured by State Farm County Mutual Insurance Company of Texas. This 1999 Ford F-150, experienced a vehicle fire.

State Farm would like to give you an opportunity to inspect the 1999 Ford F-150 and give you advance notice of our potential subrogation claim.

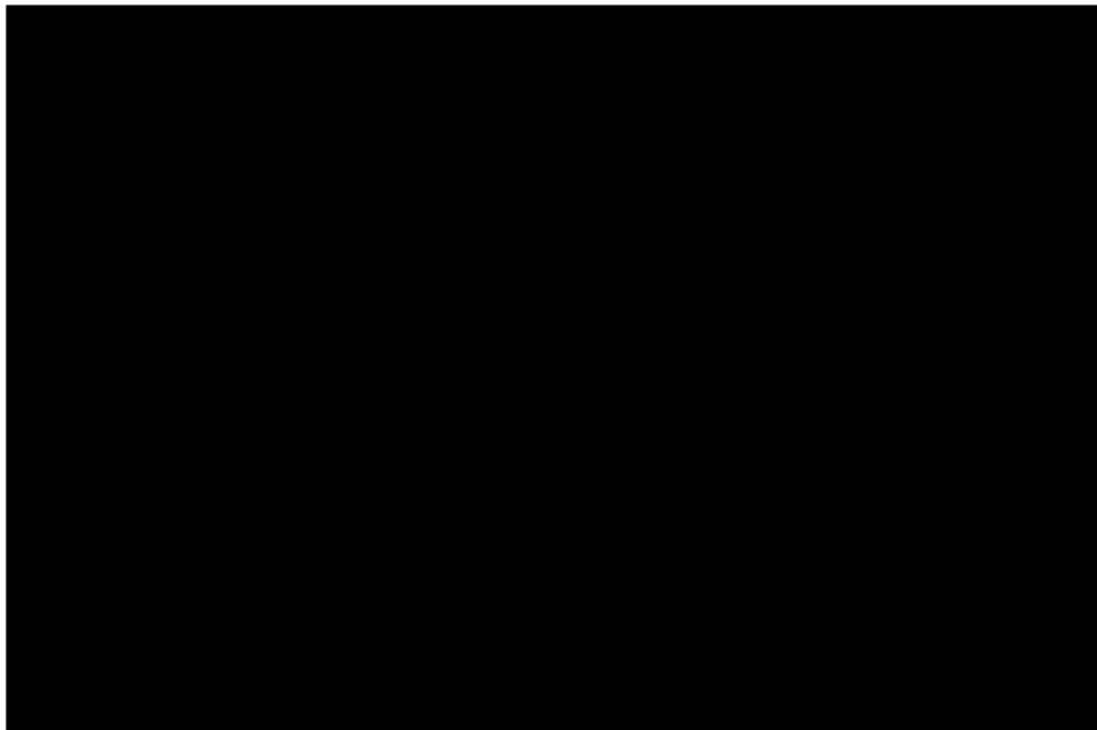
Please contact me at the number below to set up a time for your inspection.

Sincerely,

Oscar Garcia
Claim Representative
(281) 338-7500

State Farm County Mutual Insurance Company of Texas

- 11/28/02
- 199 F-150
- VIN



State Farm Insurance Companies®



Cypressview Fire Claims
7401 Cypress Gardens Blvd.
Winter Haven, FL 33888

February 20, 2003

Shawn Norton
Legal - Corporate Counsel
Ford Motor Company
One American Road
Dearborn, MI 48128-2798

RE: Claim Number: [REDACTED]
Policy Number: [REDACTED]
Insured: [REDACTED]
Insured Location: [REDACTED]
Mulberry, FL [REDACTED]
Date of Loss: 02-15-03 [REDACTED]

Dear Ms. Norton:

This correspondence serves as notice to Ford Motor Company that on the above mentioned date our policyholder [REDACTED], a named insured and her husband [REDACTED] suffered a severe fire loss to their home which resulted in major structural and personal property damages.

It is believed that their 2001 Ford Expedition (VIN: 1FMRU15W01 [REDACTED]) may have played a critical part in the fire loss. The vehicle was parked under the carport at approximately 3:00am and by 3:30am their son awoke to flames and smoke which quickly traveled throughout the house.

As a result of this damage, the home is uninhabitable. We have located a rental home for the policyholder and her family until it is determined if the insured property will be a total loss or if it is capable of being repaired.

State Farm Florida Insurance Company has requested the assistance of a cause and origin fire consultant to determine the cause of the blaze. We are also requesting that Ford Motor Company send an inspector to examine the vehicle to see the damage first-hand and determine what role the vehicle played in causing the fire at our insured's property.

Please contact me as soon as possible to advise when State Farm can expect an inspection by your company as our policyholder is extremely anxious. I, as a company representative, would also like to be present during the inspection.

We look forward to hearing from you soon in an effort to expedite this matter. Thank you for your prompt attention.

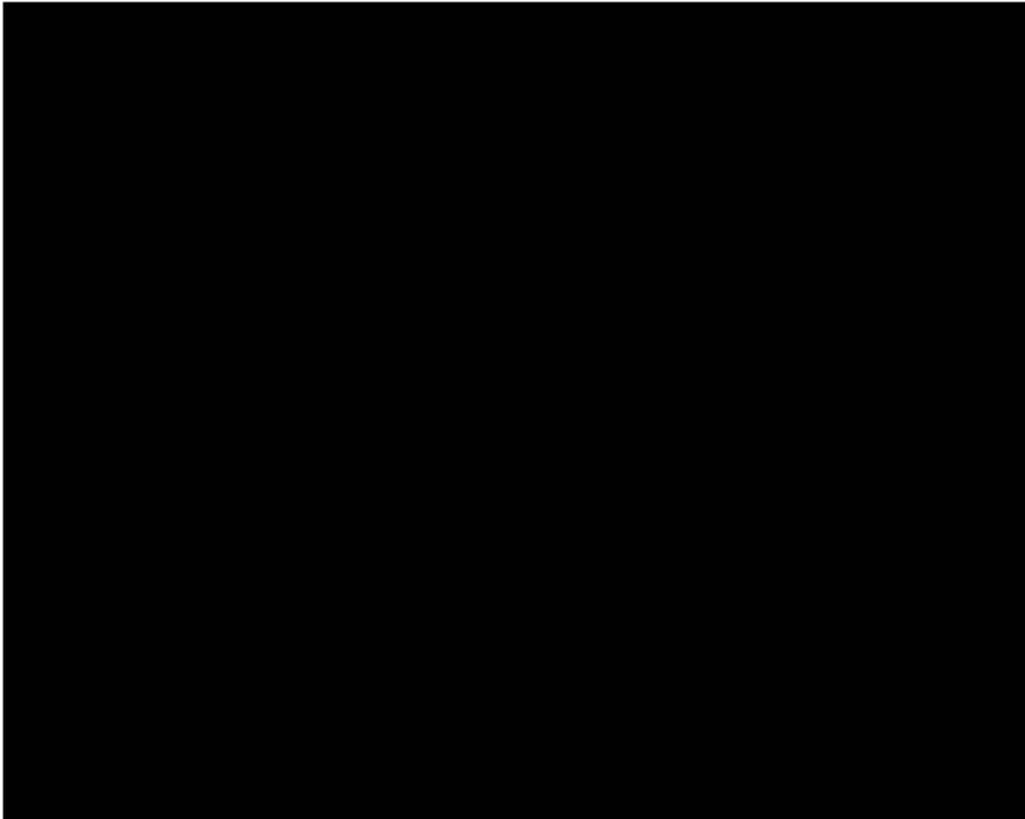
Sincerely,

A handwritten signature in cursive script that reads "Anita McDonald".

Anita McDonald
Claim Representative
883-318-4147 phone
883-318-4157 fax

State Farm Florida Insurance Company

PEB4-878 C 4148

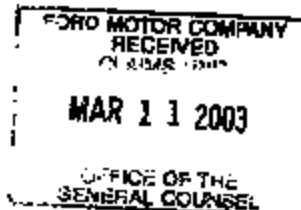


DAN C. KEENE
Attorney at Law
1003 Church Street
Flint, Michigan 48502-1001

Telephone
(810) 238-3320

Facsimile
(810) 233-8968

March 7, 2003



Ford Motor Company
OGC Product Claims
3 Parklane Boulevard, Suite 400 (PTW)
Dearborn, Michigan 48126-4207

Re: Secura Insurance, Subrogee of
Cindy Church

Dear Sir/Madam:

Please be advised that the undersigned attorneys represent Secura Insurance Company, regarding a subrogation claim resulting from a vehicle fire involving a 2001 Ford F150 pickup truck, causing damage to a significant amount of personal property in the vehicle, as well as causing damage to a nearby home. The pertinent facts are as follows.

On September 4, 2001, a [REDACTED] leased a new 2001 Ford F150 pickup truck from Lasco Ford Mercury, Inc., [REDACTED] Fenton, Michigan [REDACTED] and/or Ford Motor Credit Company. The pertinent Vehicle Lease Agreement is attached as Exhibit 1.

The fire at issue occurred during the early morning hours of May 11, 2002. At and around that time, [REDACTED] was the live-in boyfriend of [REDACTED] insured, [REDACTED] and they resided at [REDACTED], Mt. Morris, Michigan [REDACTED]. [REDACTED] has a daughter by the name of [REDACTED].

Around midnight on May 10, 2002, [REDACTED] and [REDACTED], arrived home after using the subject Ford F150 pickup truck to pick up [REDACTED], as well as many of her personal belongings, from a college which she had been attending in the State of Minnesota. Because of the late arrival and because they were tired, they decided not to unpack the truck until morning. Around 4:00 a.m. on May 11, 2002, they were awakened by a neighbor who indicated that the Ford pickup was on fire.

- '01 F150
- 5/11/02 (8)

March 7, 2003

The Genesee Township Central Fire Department was called and extinguished and investigated the fire. As a result of the fire, the vehicle was destroyed, as well as the numerous contents therein. Color laser prints of the damaged vehicle and contents are attached as Exhibit 2. There was also some damage to [REDACTED] home near the vehicle.

A copy of the fire department report is attached as Exhibit 3. The fire chief has stated that the fire originated in the dash area of the truck and thinks it was due to an electrical malfunction. \$-

At the time of the fire, [REDACTED] had a homeowners insurance policy with [REDACTED] Insurance Company. Pursuant to this homeowners policy, [REDACTED] paid [REDACTED] and [REDACTED] a total of \$7,363.15 for loss and damage to personal property. [REDACTED] also paid [REDACTED] a total of \$900.00 for damage to [REDACTED] dwelling. A copy of a list of the insured's personal property loss is attached as Exhibit 4. A copy of the estimate to repair [REDACTED] dwelling is attached as Exhibit 5. Also attached as Exhibit 6 is a copy of a document showing and confirming payments by Secura Insurance Company to their insureds for both the aforementioned personal property and dwelling loss and damages.

Based on the above, [REDACTED] as subrogee of [REDACTED] and [REDACTED] is seeking reimbursement from Ford Motor Company in the amount of \$8,263.15.

In addition to the above, you should know that [REDACTED] did not have insurance on the F150 at the time of the fire, and further that Attorney Robin Wheaton, represented [REDACTED] for a claim against Ford Motor Credit with respect to the damage to the vehicle and lease arrangement. They were able to reach an amicable resolution. [REDACTED] was involved for Ford Motor Company in that regard, and you may want to contact him about this incident and claim.

As a last item, you should know that the fire damaged truck was taken to Expressway Ford in Clio, Michigan, and sat there for an extended period so that Ford Motor would have the opportunity to have their representatives inspect the vehicle, and we believe an inspection was done by Ford Motor at some point.

Ford Motor Company

-3-

March 7, 2003

We await your response to the above.

Very truly yours,



DAN C. KEENE



ROBIN L. WHEATON

DCK/kjb

Enclosures

Exhibit 2





PE04-678 C 4185



Exhibit 3

GENESEE .P CENTRAL FIRE DEPT, GENESEE, MI 48437

A	FDNO 02511	State MI	Incident Date 06/11/2002	Station	Incident No. 0000041	Exposure 000	Transaction Add	NFIRS - 2 Fire
B	Property Details		C On-Site Materials or Products None					
B1	No. Res. Units Not Residential		On-Site Material (1)		On-Site Materials Storage Use (1)			
B2	No. Bldg. Involved Bldg. Not Involved		On-Site Material (2)		On-Site Materials Storage Use (2)			
B3	Acres Burned None		On-Site Material (3)		On-Site Materials Storage Use (3)			
D	Ignition			E1 Cause of Ignition		E3 Human Factors Contributing to Ignition		
D1	Area of Fire Origin B1 Operator/passenger area of			2 Unintentional		None		
D2	Heat Source UU Undetermined			E2 Factors Contributing to Ignition		<input type="checkbox"/> Asleep <input type="checkbox"/> Possibly impaired by alcohol or drugs <input type="checkbox"/> Unattended person <input type="checkbox"/> Possibly mentally disabled <input type="checkbox"/> Physically disabled <input type="checkbox"/> Multiple persons Involved Age <input type="checkbox"/> Age was a factor Gender		
D3	Item First Ignited UU Undetermined			Factor Contributing to Ignition (1)				
D4	Type of Material First Ignited UU Undetermined			Factor Contributing to Ignition (2)				
F1	Equipment Involved In Ignition			F2 Equipment Power		G Fire Suppression Factors		
	None Equipment Involved NNN None Brand Model Serial # Year			Equipment Power Source		None Fire Suppression Factor (1)		
				F3 Equipment Portability		Fire Suppression Factor (2)		
						Fire Suppression Factor (3)		
H1	Mobile Property Involved				H2 Mobile Property Type & Make			
	3 Involved in Ignition and burned				Mobile Property Type 11 Passenger car.PICK UP TRUCK			
	Mobile Property Model F-150 PICK UP		Year 2001		Mobile Property Make FO Ford			
	License Plate Number State [REDACTED] MI							
	VIN Number 2FTZX172810 [REDACTED]							
<input type="checkbox"/> Pre-Fire Plan Available			<input type="checkbox"/> Arson Report Attached			<input type="checkbox"/> Coroner Report Attached		
			<input type="checkbox"/> Police Report Attached			<input type="checkbox"/> Other Report Attached		

03528/332

Robin L. Wheaton, P.C.

Attorney at Law
1003 Church Street
Flint, Michigan 48502

Telephone (810) 232-0901
Fax (810) 233-8868

**CONSUMER AFFAIRS
SECTION**

2 JUL 17 AM 1:48

July 9, 2002

Ford Motor Company
Consumer Affairs
Attn: Vince
16800 Executive Drive Plaza
Dearborn, Michigan 48126-4207

RE: Robert Bachand - Burning of his 2001 F-150 pick-up on or about May 11, 2002

Dear Sir:

This letter is to inform you that I have been retained by [REDACTED] with regard to the fire that destroyed his 2001 Ford Truck. It is our position that, and confirmed by statements made by the investigators, the fire started somewhere in the dash area inside the car or the windshield wiper area outside the vehicle and is the direct result of a defect either in the wiring in the dashboard or in the windshield motor mechanism of this vehicle. I have discovered that there has been a recall on Ford vehicle's such as [REDACTED] as a result of the defect in the windshield washer mechanism that could potentially cause fire and it is our belief that is what happened here. I have further been advised that there have been problems with the ignition systems with some Ford vehicles which also may be relevant in this case although based on the statements by the fire investigator it is more likely caused by a defect in the wiring system under the dashboard a defect in the windshield washer system.

I am continuing to investigate this matter with regard to the recall and also dealing with Ford Motor Company's financial arm with regard to [REDACTED] obligation to pay on this vehicle. [REDACTED] was told back in May of 2002 when he contacted you that some one would be out to view the vehicle. To date, no one has contacted him or been out to his residence. Please advise me as to whatever this is still something Ford intends to do!

I would appreciate it if you would contact me at your earliest convenience so that I may discuss this issue with you or your representative. I will be sending a copy of this letter to Ford Motor Credit Corporation.

It is hoped that this matter may be resolved amicably for all parties concerned and I appreciate your cooperation in this matter.

Sincerely,



Robin L. Wheaton
Attorney at Law

27

Cc: Ford Motor Credit Corporation
[REDACTED]

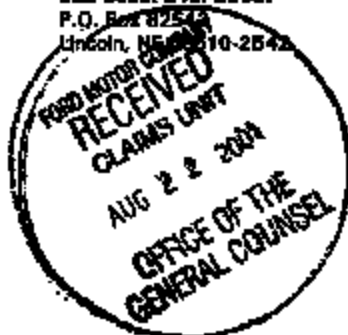


State Farm Insurance Companies

August 15, 2001



Auto Claims Central
222 South B4th Street
P.O. Box 82543
Lincoln, NE 68501-2543



**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Ford Motor Company
Attention: Parts Analysis Division
Park Lane Towers West, Suite 400
3 Park Lane Boulevard
Dearborn, MI 48126-2568

RE: Claim No.: [REDACTED]
Our Insured: [REDACTED]
Date of Loss: August 3, 2001
Make Model and Year of Product: 2000 Ford F150 Pickup
Vehicle ID No.: 1FTRX18L4Y [REDACTED]

Dear Sir or Madam:

The identified 2000 F150 pickup is insured by State Farm Mutual Automobile Insurance Company. This vehicle experienced what appears to be a mechanical fire.

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

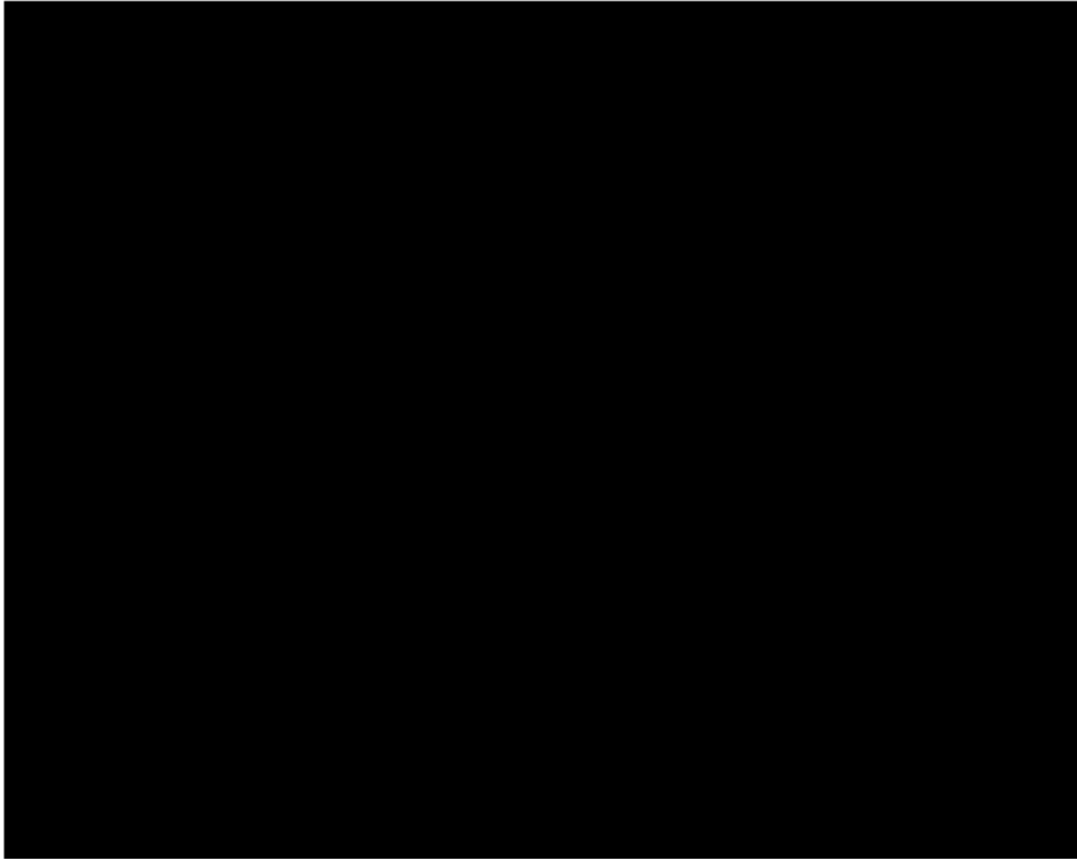
Please contact me at 402-327-3174 to set up a time for your inspection along with our independent cause and origin expert.

Sincerely,

A handwritten signature in cursive script that reads "Bruce A. Madison".

Bruce A. Madison
Claim Specialist
Special Investigative Unit
State Farm Mutual Automobile Insurance Company

023/0815025



State Farm Insurance Companies



January 31, 2001

Ford Motor Company
Parklane Towers West STE 400
300 Parklane BLVD
Dearborn MI 48136-2568



Virginia Beach Service Center
641 Phoenix Drive
Box 8890
Virginia Beach, Virginia 23450-2000
Phone: (757) 431-4200

Re: Claim Number: [REDACTED]
Our Insured: [REDACTED]
Date of Loss: January 4, 2001
Make, Model, and Year of Product: 1999 Ford Pickup F150
VIN Number: 1FTZX1722X [REDACTED]

Dear Sirs:

The identified vehicle is insured by State Farm Insurance. This vehicle experienced a fire.

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

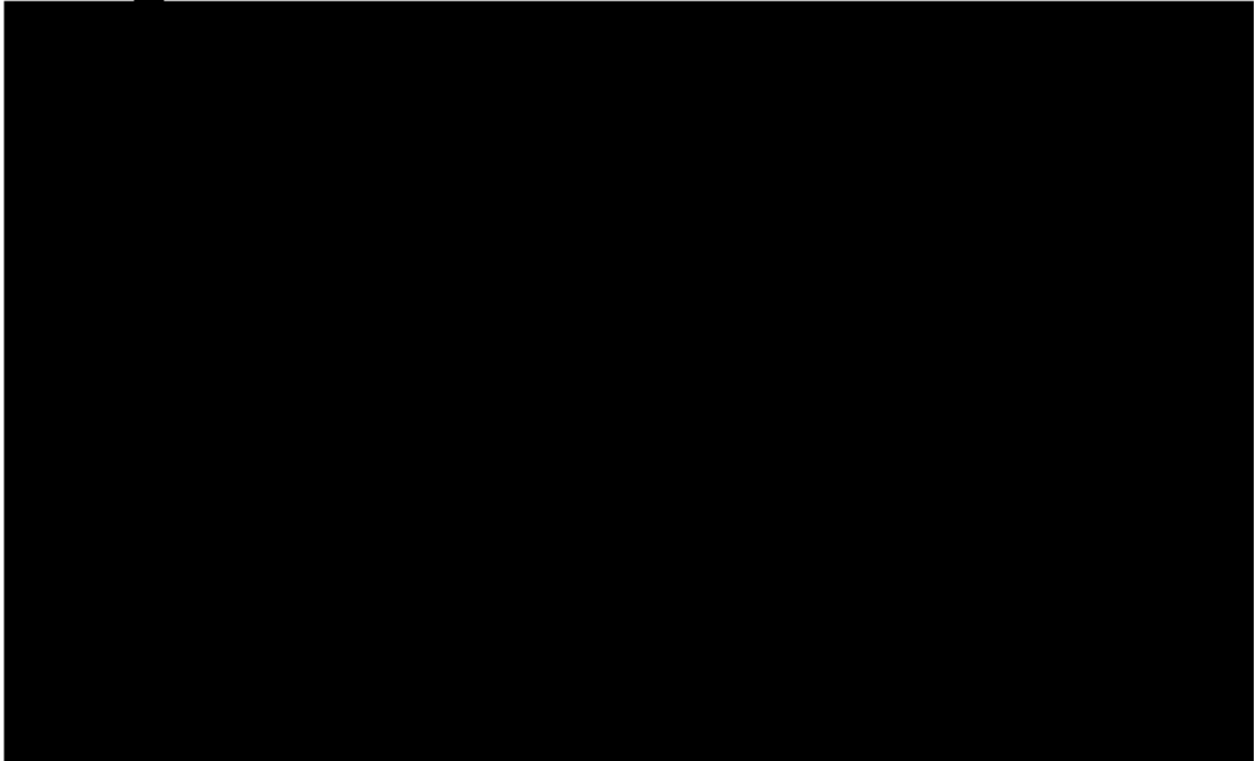
Please contact me at (757) 431-4223 so that I can provide you with the location of the vehicle and answer any questions you may have.

Sincerely,

A handwritten signature in cursive that reads "Kathy Sanda".

Kathy Sanda
CLAIM SPECIALIST
STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY
PHONE (757) 413-4223

KS/037/0131006



Bloomington/Twin Cities
1600 West 82nd Street
Suite 200
Bloomington, MN 55431-1430
1-800-354-6011

MetLife[®] Auto & Home

February 19, 2002

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

Our Customer: [REDACTED]
Our Claim Number: [REDACTED]
Date of Accident: 12-25-2001

- NO PHOTOS
- NO EXP. RPT.
460200

Dear Ford Motor Company:

This letter is a follow up to your letter dated February 12, 2002, requesting further information about this vehicle and incident. The following answers are in response to the corresponding requests from your letter.

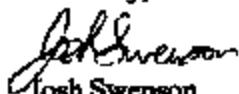
1. Date of incident was 12-25-01. Accident happened in Sioux Falls, South Dakota.
2. On 12-25-01 [REDACTED] was driving the 2001 Ford F150 XLT (VIN 2FTRX18L11C [REDACTED]) in Sioux Falls at approx. 9:30 a.m. He was driving towards his home when he noticed that his exhaust was giving out black smoke. The engine temperature was not hot and he was only a couple miles from home so he kept driving. When he got home he parked the vehicle in the driveway and then noticed that flames were shooting up from underneath the truck in between the box and cab. He called the Sioux Falls Fire Department and they responded and put the fire out. The fire was concentrated in the middle of the truck both inside and out.
3. We do not have a police or fire report.
6. 8,000 miles on truck at time of incident.
7. We do not have original color photos from several different angles showing the defective part (a). You will have to inspect vehicle for your own photos.
10. The alleged defect is the failure of factory installed original equipment (thermal anomaly in wiring harness).
11. Our expert conducted a preliminary inspection to find the cause of the fire, which is noted above. Once you have had a chance to examine the vehicle we may then have our expert complete the inspection of the wiring harness and its surroundings.
12. The alleged defective part has not been repaired or replaced according to the insured's knowledge.
13. The location of the vehicle is: Sioux Falls Ford, [REDACTED] Sioux Falls, SD [REDACTED]
14. See enclosed Total Loss Report.
15. We do not have a complete service history. The vehicle was purchased from Sioux Falls Ford, which is the same place that the vehicle is located at.

Served by MetLife Auto & Home, a brand of Metropolitan Property and Casualty Insurance Company and its Affiliates, Warwick, RI

- 16. No known after market additions or modifications made to vehicle.
- 21. Yes the engine was running -
- 22. Yes the keys were in the ignition
- 25. This vehicle was leased from Sioux Falls Ford in March of 2001 as a new vehicle.

Please contact me at 1-800-854-6011, extension 7817 with any questions. Thank you.

Sincerely,



Josh Swenson
MetLife Auto & Home
Claim Adjuster
Ext. 7817





FARMERS

National Document Center
P.O. Box 268992
Oklahoma City, OK 73126-8992
claimdocuments@farmersinsurance.com
FAX : 877-247-1389

CUSTOMER
RELATIONS
CENTER
2004 OCT 25 P 12

10/18/2004

Ford Motor Company
Attn: Consumer Affairs
Po Box 6248
Dearborn, MI 48126

Re: Our Insured: [REDACTED]
Our Claim #: [REDACTED]
Date of Loss: 08/16/2004
Your Insured: Ford Motor Company
Your Claim #: [REDACTED]
Deductible Amount: \$100.00
Loss of Use Amount: \$0.00
Total Amount Owed: \$10,569.62

FORD MOTOR COMPANY
RECEIVED
OCT 27 2004
OFFICE OF THE
GENERAL COUNSEL

Dear Consumer Affairs:

We have made payment to our insured for damages resulting from this accident. Our investigation has established that the above loss was caused by the negligence of your insured. By virtue of our subrogation rights this letter is to advise you that we expect payment from you for the amount of damages within 14 days of the receipt of this letter.

Be advised that no partial payment, which is less than the full amount claimed herein, will be considered in any way an acceptance of benefits, a novation or an accord and satisfaction of this claim without the express written release of our claim executed by an individual who identifies himself/herself as a member of our subrogation department. Therefore, our legal rights to enforce collection on the remaining amount of the claim shall not be waived or stopped due to a partial payment by you or someone acting on your behalf.

If you need additional support for our claim or require further information, please call me at 800-944-7515 x 7308 with your FAX number so that the requested information can be sent to you.

Sincerely,
Farmers Insurance Exchange

Joyce Hillard-Franklin

Joyce Hillard-Franklin
Auto Subrogation Representative
joyce.hillard-franklin@zurich.com
ATTACHMENT(S)

WSD - 11/6/99
ESP - 28/24,000
(started 4/25/02)

6/16/04
\$10,569.62
100 F-150
100,000 (2)
VIN

08/27/2004 at 03:52 PM File# 66693-00123267

File ID GA040809002

Owner:

Appraiser: Jerry Alexander

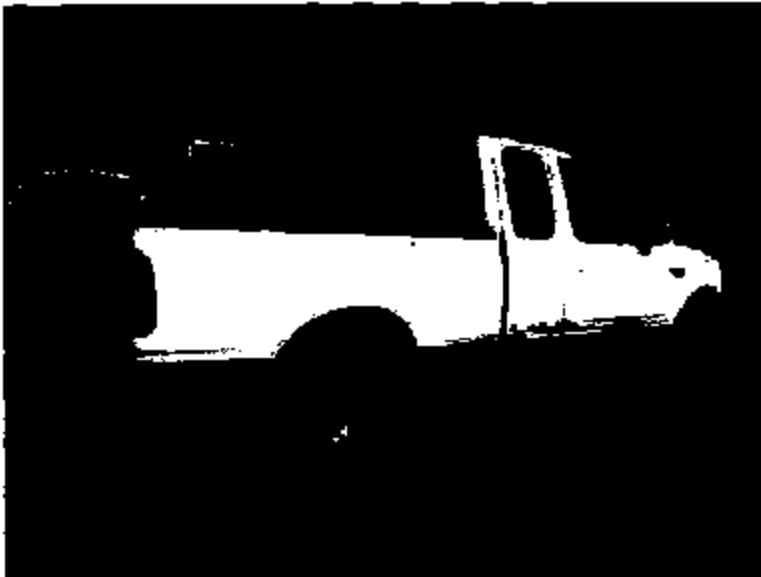
2000 FORD F150 4X4 SUPERCAB 6-4.2L-FI 4D SHORT WHITE/SILV Int:GREY

CHRY CLAIN SERVICES

Winder, GA

Business: (706)207-0976

IMAGE REPORT



08/27/2004: EST01:



08/27/2004: EST01:

08/27/2004 at 03:52 PM File# 66693-00123267

File ID GA040809002

Owner: [REDACTED]

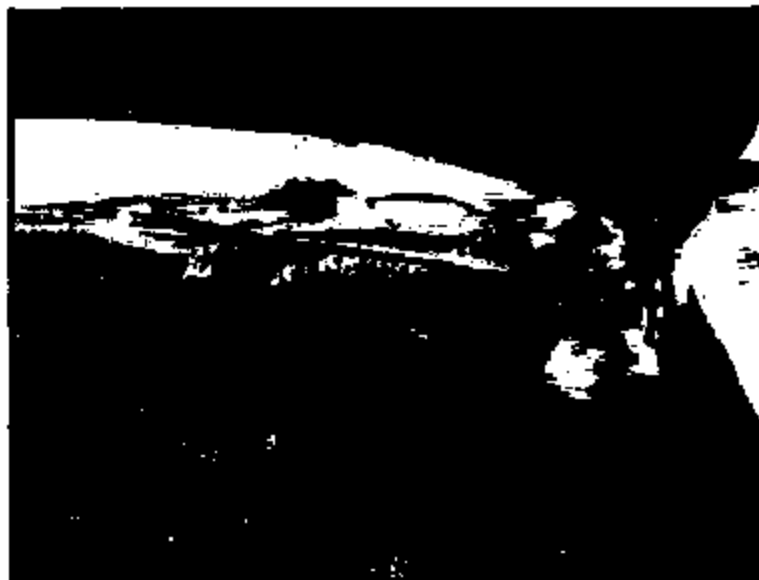
Appraiser: Jerry Alexander

2000 FORD F150 4X2 SUPERCAB 6-4.2L-FI 4D SHORT WHITE/SILV Int:GREY

IMAGE REPORT



08/27/2004: EST01:



08/27/2004: EST01:

08/27/2004 at 03:52 PM File# 66693-00123267

File ID GAD40809002

Owner: [REDACTED]

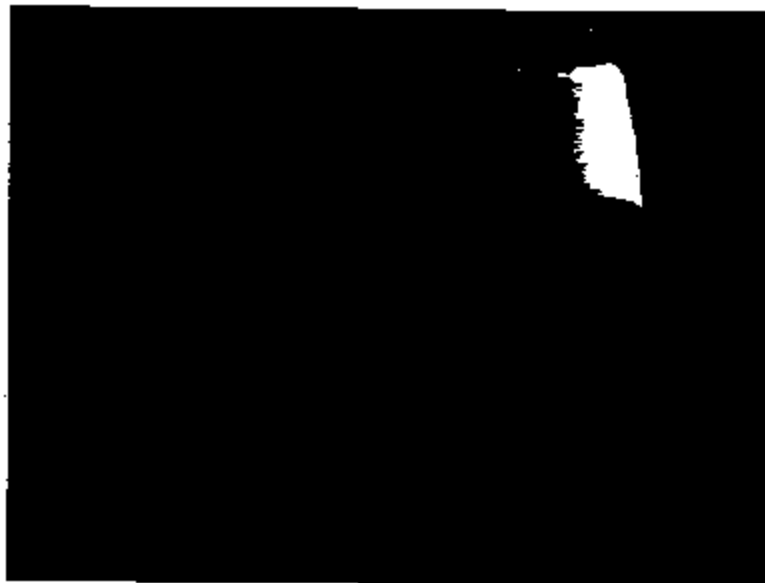
Appraiser: Jerry Alexander

2000 FORD F150 4X2 SUPERDUTY 6-4.2L-FI 4D SHORT WHITE/SILV Int:GREY

IMAGE REPORT



08/27/2004: EST01:



08/27/2004: EST01:

08/27/2004 at 03:52 PM File# 66693-00123267

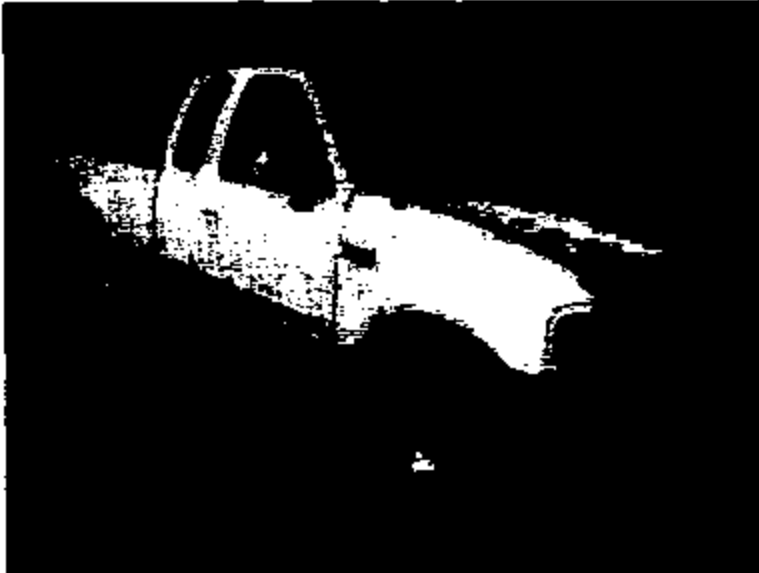
File ID GA040809002

Owner: [REDACTED]

Appraiser: Jerry Alexander

2000 FORD F150 4X2 SUPER CAB 6-4.2L-FI 4D SHORT WHITE/SILV Int:GREY

IMAGE REPORT



08/27/2004: EST01:



08/27/2004: EST01:

08/27/2004 at 03:53 PM File# 66693-00123267

File ID GA040809002

Owner: [REDACTED]

Appraiser: Jerry Alexander

2000 FORD F150 4X2 SUPERCAB 6-4.2L-FI 4D SHORT WHITE/SILV Int:GREY

IMAGE REPORT



08/27/2004: EST01:



08/27/2004: EST01:

08/27/2004 at 03:52 PM File# 66693-00123267

File ID GA040809002

OWNER: [REDACTED]

Appraiser: Jerry Alexander

2000 FORD F150 4X2 SUPERCAB 6-4.2L-FI 4D SHORT WHITE/SILV Int:GREY

IMAGE REPORT



08/27/2004: EST01:



08/27/2004: EST01:

08/27/2004 at 03:52 PM File# 66693-00123267

File ID GA040809002

Owner: [REDACTED]

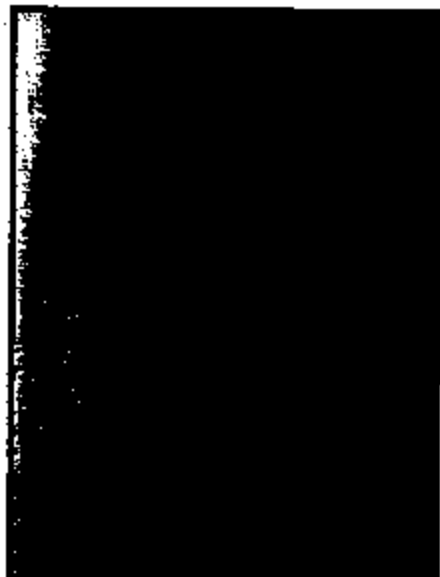
Appraiser: Jerry Alexander

2000 FORD F150 4K2 SUPERCAB 6-4.2L-FI 4D SHORT WHITE/SILV Int:GREY

IMAGE REPORT



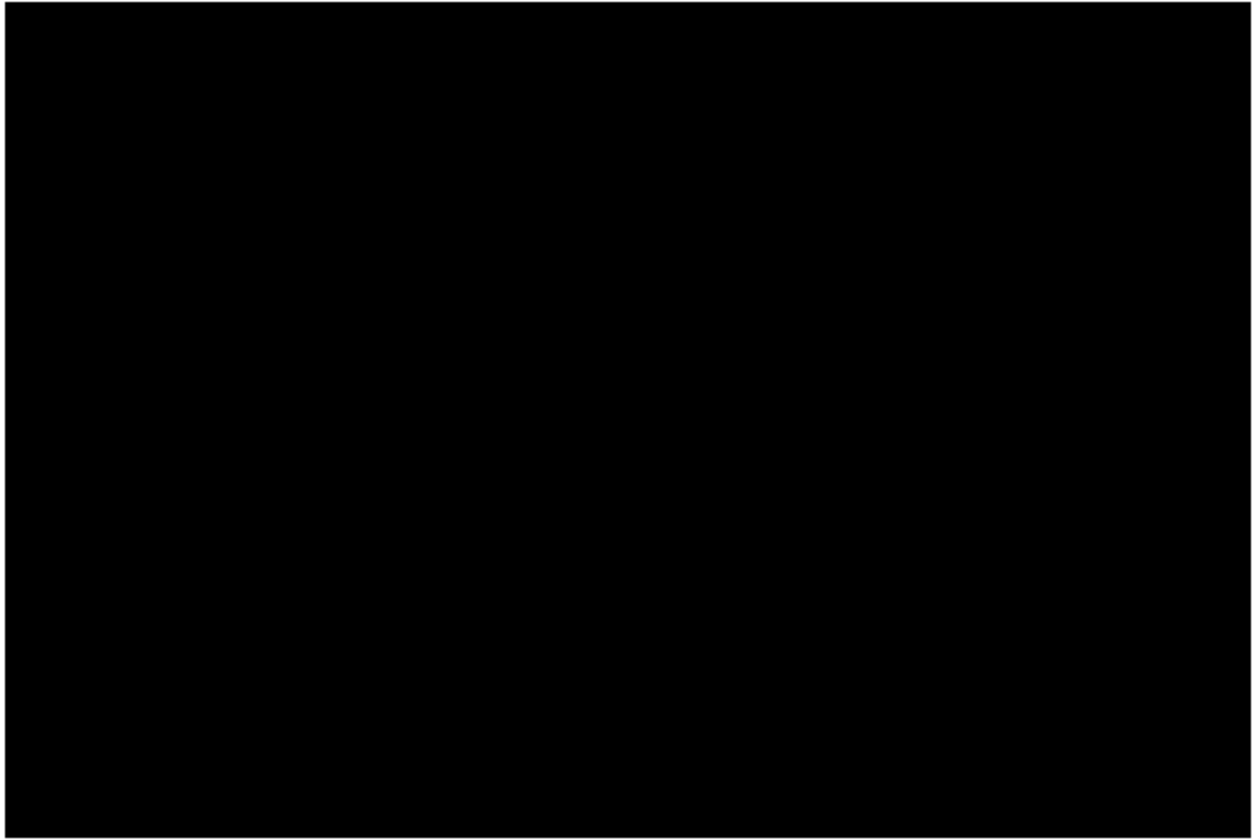
08/27/2004: EST01:



08/27/2004: EST01:

CCC Pathways - A product of CCC Information Services Inc.

.....





Memorandum

Date: 10-18-04

To: [Redacted]

From: Carolyn Ortega, Subrogation Specialist II

Re: WC 904025-70 TRFD: Anthony Lawson

530 Wells Fargo Drive, Suite 108
Houston, Texas 77090
(281) 397-0500 tel
(281) 397-7750 fax

Lawton Anthony

RECEIVED OCT 5 2004

493536 @

6/04

Mr. Norton:

Please find enclosed some info you requested + a letter from Killgore + Capps that has done maintenance checks + performed.

per [Redacted] no receipts - he stated the only thing he has done was have "alternator replaced" during his warranty period. at Leif Johnson Ford - [Redacted] (512) 312-0800 located in Buda, TX. where vehicle was purchased

Any questions please call me. I would like to resolve this matter
281 860-2254 Carolyn Ortega

WFO 1/1/00

PER-878 C 4178

100,000 @
VIC 7-4-13
NO VRT#



Office of the General Counsel

PRIVILEGED & CONFIDENTIAL

Ford Motor Company
Ford Tower West
Suite 300
Three Peridans Boulevard
Dearborn, Michigan 48126-2566

April 8, 2004

Mercury Insurance
590 Wells Fargo Dr.
Suite 108
Houston, TX 77090

ATTENTION: STEPHANIE STANLEY
2nd REQUEST

RE: Claimant: [REDACTED]
Your Claim #: [REDACTED]
DOL: 12-20-03

open

Dear Ms. Stanley:

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 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 drill payments.
- 2. 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:

- 3. What was the city and state of occurrence: AUSTIN, TEXAS
- 4. The 17 digit vehicle identification number:
NA 1FTZX1725YK [REDACTED]
- 5. What was the mileage at time of occurrence: approx. 100,000
- 7. What is the alleged defect: electrical overheating at the cruise control deactivation switch.
- 8. Has the alleged defective part been repaired or replaced? (circle one) Yes or (No) fire
- 9. What is the current location of the vehicle? Insurance Auto Auction
- 10. List all after market additions or modifications that were made to the vehicle:
stock# 414 953

(512) 385-3126

Austin

-
-
-
11. Was the engine running? (circle one) Yes or No
12. Were the keys in the ignition? (circle one) Yes or No
13. Was this vehicle purchased new or used:

New 1-6-2000

If purchased used, provide the date of purchase, mileage at the time of purchase, and from whom the vehicle was purchased: 1-6-2000, Leif Johnson Ford

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

RECEIVED MAR 31 2004



March 26, 2004

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

Re: our insured: [REDACTED]
Our claim no: [REDACTED]
Date of loss: 12-20-03

Dear Shawn Norton:

Please find attached as your requested the photos of the insured vehicle damage, fire department report and the experts report.

Sincerely,


Stephanie Stanley
Subrogation Specialist II
Mercury County Mutual Insurance
281-880-2276

~100,000 (2)
100 F-158



The ProNet Group, Inc.

2470 Gray Falls Drive
Suite 200
Houston, Texas 77077-6508
281.496.2865 (phone)
281.496.6004 (fax)
800.210.7208 (toll free)
pronet1@flsh.net (eMail)
www.pronetgroup.com

REPORT OF FINDINGS

CLAIM NO: [REDACTED]

INSURED [REDACTED]

2000 FORD F150 TRUCK

Prepared for:

**MERCURY COUNTY MUTUAL INSURANCE COMPANY
P. O. BOX 203010
AUSTIN, TEXAS 78720-3010**

Randy Callison, ASE, CFEI, CVFI
Project Manager

January 30, 2004

ProNet File No. 7214

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- PASSENGER COMPARTMENT	
- MITCHELL REPAIR INFORMATION	
- RECALLS	
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PE04-076 C 4103

I. INTRODUCTION

On December 20, 2003, a fire occurred involving a Ford vehicle. On December 31, 2003, The ProNet Group, Inc., was retained by Ms. Jessica Bonnett of Mercury County Mutual Insurance Company to inspect the vehicle and determine the origin and cause of the fire.

On January 9, 2004, Randy Callison of The ProNet Group inspected the vehicle at Insurance Auto Auction, located at 1000 Dalton Lane, Austin, Texas. During this visit, the vehicle was visually observed and photographs were taken to document our observations. The observations described and pictured in this report are representative of the conditions observed during our visit. This report will not reflect all conditions in and around the vehicle, but will demonstrate typical conditions observed. All photographs are available for review.

II. BASIS OF REPORT

This report is based on the following:

1. Inspection of the vehicle.
2. Research of the National Highway Traffic Safety Administration (NHTSA) records to identify any preliminary evaluations, engineering analyses, or recalls on 2000 Ford F150 trucks.

PEBA-070 C 4104

3. Research of Mitchell Repair Information Co., LLC (Mitchell-on-Demand) records relating to the cruise control circuit on 2000 Ford F150 trucks.
4. Review of the fire record (see Attachment A).
5. Information and observations as noted in this report.

This report is based upon information available to us at this time, and is not necessarily final. Should additional information be presented or discovered, we reserve the right to review and, if necessary, revise this report and our conclusions in light of that information.

III. CONCLUSION

Based on our observations and findings as noted in this report, it is our opinion that the 2000 Ford F150 truck fire originated in the engine compartment, was accidental in nature, and caused by electrical overheating at the cruise control deactivation switch. It is further our opinion that Ford Motor Company should be held accountable for the loss.

We base our opinions on the following:

1. The most significant burn occurred within the engine compartment.
2. The only significant electrical component in the area of most intense burn was the cruise control deactivation switch.
3. The cruise control deactivation switch exhibited evidence of intense burn.

PEBA-078 C 4185

4. The Austin Fire Department Report No. WP801 (see Attachment A).
5. All other contributing factors were ruled out.

V. DISCUSSION

INTERVIEW

Our interview with the [REDACTED] the owner of the truck, revealed the following:

1. There were no problems with the truck.
2. The vehicle was last operated several hours prior to the fire.
3. The vehicle had approximately 100,000 miles.
4. There was no aftermarket equipment installed on the vehicle.
5. The cruise control was last operated approximately one and one-half (1½) years ago.

VEHICLE DESCRIPTION

The vehicle was identified as a white two-door 2000 Ford F150 extended cab truck bearing Vehicle identification No. 1FTZX1725Y [REDACTED] Texas license plate No. [REDACTED] and Insurance Auto Auction No. 414953.

PC04-078 C 4186

EXTERIOR INSPECTION

Our inspection of the vehicle exterior revealed burn to the hood above the brake master cylinder and air filter housing.

ENGINE COMPARTMENT

Our inspection of the engine compartment revealed:

1. A mild upper level burn that was more intense in the left third section of the compartment.
2. The battery was located in the right rear corner of the compartment. There was no evidence of aftermarket electrical wiring secured to the battery cable ends.
3. The plastic and rubber components in the right third of the compartment did not evidence any significant burn.
4. The fuel supply and return lines were in their respective locations and secured.
5. The center third of the compartment evidenced melting to some of the plastic and rubber components.
6. The engine compartment lamp was had fallen right of the brake booster, the electrical wiring was void of its insulation.
7. The majority of the air filter housing was consumed exposing a partially consumed air filter.

PE04-078 C 4187

8. The ABS electro hydraulic control unit located below the air filter housing did not evidence any significant burn.
9. The brake master cylinder fluid reservoir was consumed in a progressive pattern. With the most intense burn at the front of the reservoir.
10. The power distribution center located left of the master cylinder evidenced exterior surface burn to the plastic housing. The most intense burn was observed on the right face of the housing adjacent to the front third of the master cylinder. The electrical wiring that was visible at the distribution center was basically intact, however some of the electrical wires evidenced partially consumed and blistered insulation. This was at the right front corner of the center directly right of the cruise control deactivation switch, which was mounted on the top face of the brake master cylinder.
11. The power steering fluid reservoir evidenced burn across its left face. The reservoir is located to the right of the front edge of the brake master cylinder.
12. The speed control servo located forward of the power distribution center was burned across its right face. The electrical connector located at the right rear corner of the servo evidenced a more intense burn. The electrical wiring at this connector was void of its insulation. The electrical wiring, which routed to the cruise control deactivation switch, was void of insulation.
13. The cruise control deactivation switch exhibited evidence of intense burn. The two (2) electrical connections were loose on the switch terminals.

PEN-078 C 4188

PASSENGER COMPARTMENT

Our inspection of the passenger compartment did not reveal any fire damage. The passenger compartment fuse panel revealed Fuse 13 a 20-ampere fuse and Fuse 14 a 15-ampere fuse had "blown".

MITCHELL REPAIR INFORMATION REVIEW

We contacted the Mitchell Repair Information Co., LLC (Mitchell-on-Demand) to identify the function of Fuses 13 and 14. Review of the Mitchell Repair wiring diagram for 2000 Ford F150 vehicles revealed:

1. Fuse 13 was a 20 amp fuse "Hot at all times" and supplied 12V to the cruise control deactivation switch mounted on the brake master cylinder.
2. Fuse 14 was a 15 amp fuse "Hot at all times" and supplied 12V to the engine compartment lamp (courtesy lamp circuit).

RECALLS

We searched the National Highway Traffic Safety Administration (NHTSA) database to identify any preliminary evaluations, engineering analyses, or recalls on 2000 Ford F150 trucks relating to cruise control switch failures that result in engine compartment fires.

A search of their records, as well as technical service bulletins, did not indicate any problems relating to cruise control switch failures resulting in engine compartment fires within 2000 Ford F150 trucks at this time.

However, a search of their records and technical service bulletins did reveal ODI Action No. EA02-025. This ODI is an engineering analysis investigation involving the cruise

PEBA-878 C 4188

control deactivation switch failures that result in fires. While the 2000 Ford F150 was not a listed vehicle in this investigation, it should be noted that the switch is virtually identical to the ones used in the vehicle in question.

SUMMARY

In summary, this 2000 Ford F150 truck fire originated in the engine compartment and was accidental in nature. The cause of the fire was electrical overheating at the cruise control deactivation switch. Ford Motor Company should be held accountable for the loss.

Ford Motor Company is located at Parklane Towers West, Suite 400, 3 Parklane Boulevard, Dearborn, Michigan 48126-2568, and Phone No. 313-322-3000.

RECOMMENDATIONS

We recommend that the 2000 Ford F150 vehicle be retained, secured and protected regarding any further testing or inspection by other interested parties. We also reserve the right to be present and observe any and all inspections or testing of the Ford vehicle by any other concerned parties.

PC04-078 C 4100

V. ATTACHMENTS

4-

A. FIRE REPORT

PERA-878 C 4191

Austin Fire Department

517 S. Pleasant Valley Road
Austin, Texas 78741

Phone: (512) 974-0188
Fax: (512) 974-0182

A) NFIRS - 1 Basic

FDID	State	Incident Date	Unit	Shift	Incident Number	Exposure
WP801	TX	12/20/2003 13:38:16	E07	C	389528	0

B) Address Information

Street Number/Name	[REDACTED]	Suite	
City	AUSTIN	State	TX
Address Description		Zip Code	[REDACTED]
Location Type	2 Intersection	Census Tract	

C) Incident Type

131 Passenger vehicle fire

E) Dates / Times

Alarm Time	12/20/2003 13:38:16
Arrival Time	12/20/2003 13:42:44
Controlled Time	
Last Unit Cleared	12/20/2003 14:07:09
Day of Week	Saturday

D) Aid Given or Received Type

N None
Mutual Aid Co. Inc. Number (if obtained)

F) Action Taken

1) 11 Extinguish
2)
3)

G2) Estimated Property Losses & Values

Contents Loss	0
Property Loss	0
Pre Incident Value	
Contents Value	0
Property Value	1800

G1) Apparatus / Personnel Resources

	Submission	EMS	Other
Apparatus	1	0	0
Personnel	4	0	0

H1) Casualties

	Deaths	Injuries
Fire Service Casualties	0	0
Civilian Casualties	0	0

H3) Hazardous Materials Release

H2) Detector

I) Special Property Use

J) Property Use 860 Street, other

K) Person/Entity Involved

Business Name (if applicable)		Business Phone () -	
Type of Contact		Contact Phone () -	
Contact Name			
Contact Address			
City	State	Zip Code	-
Insured	Unknown	Insurance Company Name	

M) Authorization

Signature:		Date	12/20/2003
Officer in charge	BRAD BALLARD	Rank	Lieutenant
Officer Reporting		Rank	

TX 01033592
Attn: Jessica
2 pgs

L) Remarks

Apparatus Information

Unit: ENGINE 07

Dispatched 12/20/2003 13:38:44 Responding 12/20/2003 13:38:14 Onscene 12/20/2003 13:42:44 Cleared 12/20/2003 14:07:00

Incident: 07 ACB OF 200 F 150 FORD PICKUP TRUCK ON FIRE IN ENGINE COMPARTMENT. OWNERS HAD TRIED TO EXTINGUISH WITH GARDEN HOSE. E7 EXTINGUISHED WITH BOOSTER LINE. FIRE APPEARED TO HAVE ORIGINATED ON DRIVER SIDE NEAR THE ELECTRONICS MODULE, WITH MOST INTENSE BURNING AROUND AIR FILTER. MOST LIKELY IGNITION SOURCE WAS ELECTRICAL.

Personnel Information

NFIRS - 10 Personnel

<u>Attendees</u>		<u>Unit Number</u>	<u>Rank</u>
BALLARD	BRAD	FD0578	Lieutenant
ODEMS	BRUCE	FD1548	Firefighter
SHARPE	JERRY	FD1078	Fire Specialist
DE LA REZA	ANDRE	FD1883	Firefighter

V. ATTACHMENTS

4-

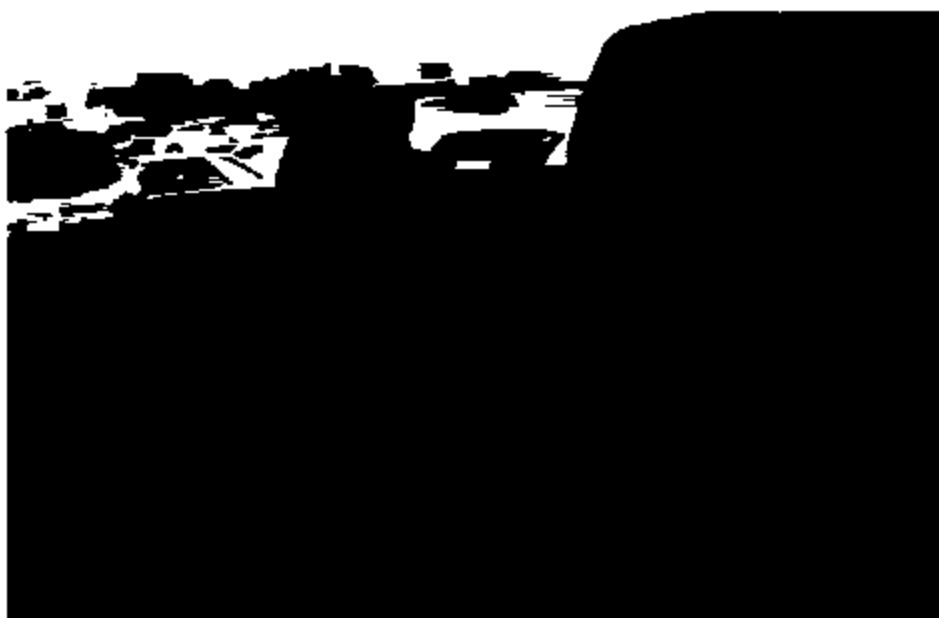
B. PHOTOGRAPHS

PC04-078 C 4194

1. View showing the front of the 2000 Ford F150 truck.

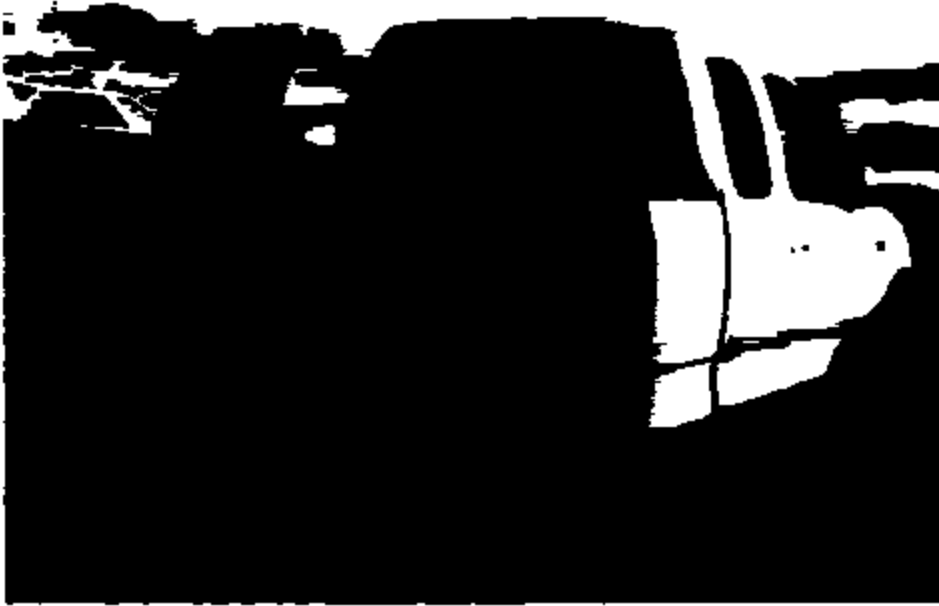


2. Rear view of the Ford truck.



PE94-579 C 4186

3. Right side view of the truck.



4. Left side view of the truck.
→



PERM-078 C 4108

5. View of the vehicle identification number.

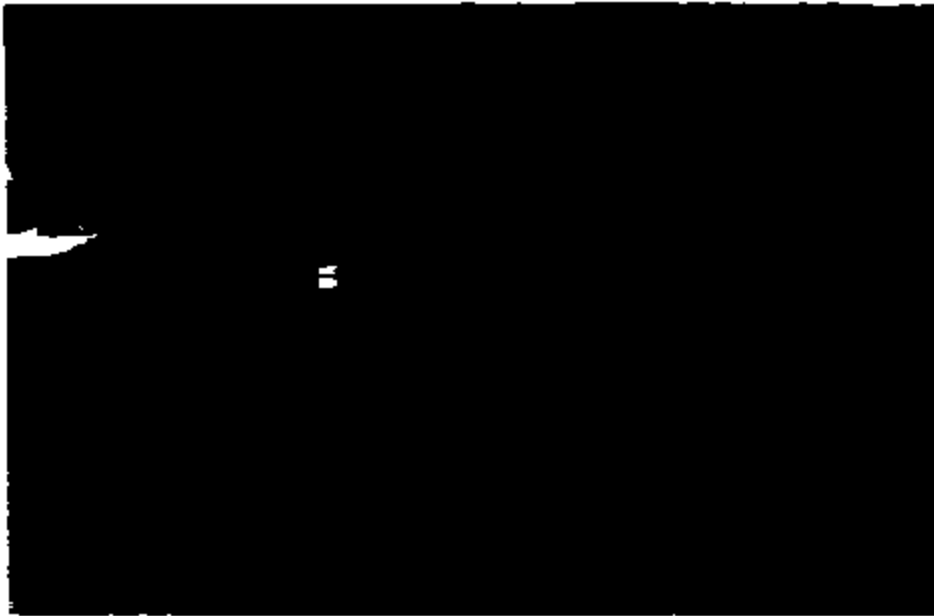


6. View of the hood.



PE04-078 C 4197

7. Close-up view of the burn to the hood.



8. Right to left view of the interior of the extended cab.

→



PC04-070 C 4108

9. View of the front passenger area.



10. Left to right view of the front passenger area.

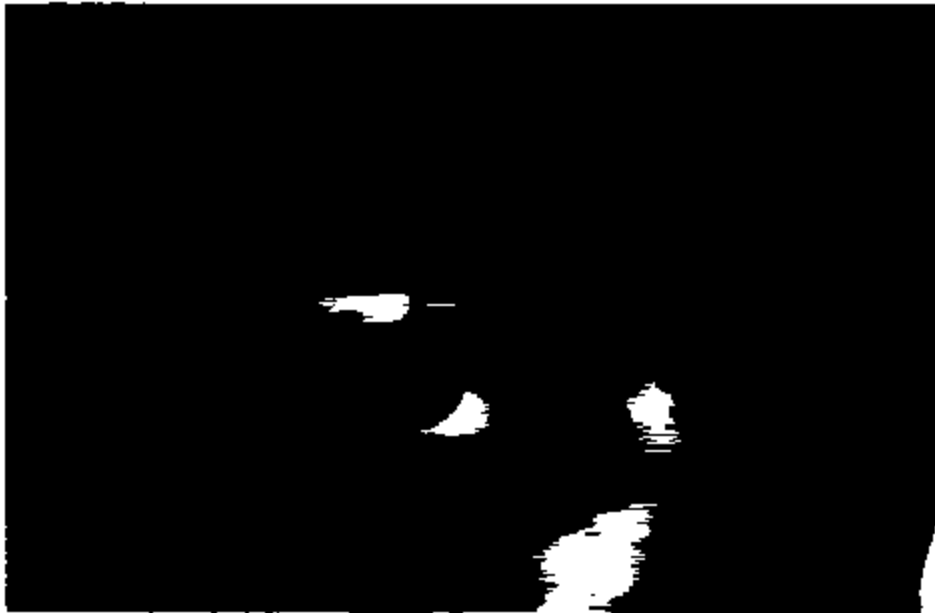


PE04-878 C 4188

11. View of the underside of the hood.



12. Close-up view showing the burn to the underside of the hood.



PC04-878 C 4208

13. Overview of the engine compartment.



14. Right to left view of the engine compartment.



PEGI-879 C 4281

15. Left to right view of the engine compartment.



16. View showing the right third of the engine compartment.



PC04-078 C 4202

17. View showing the center third of the engine compartment.



18. View showing the left third of the engine compartment.



PE04-078 C 4203

19. View of the battery.



20. View of the left third of the compartment from the top.

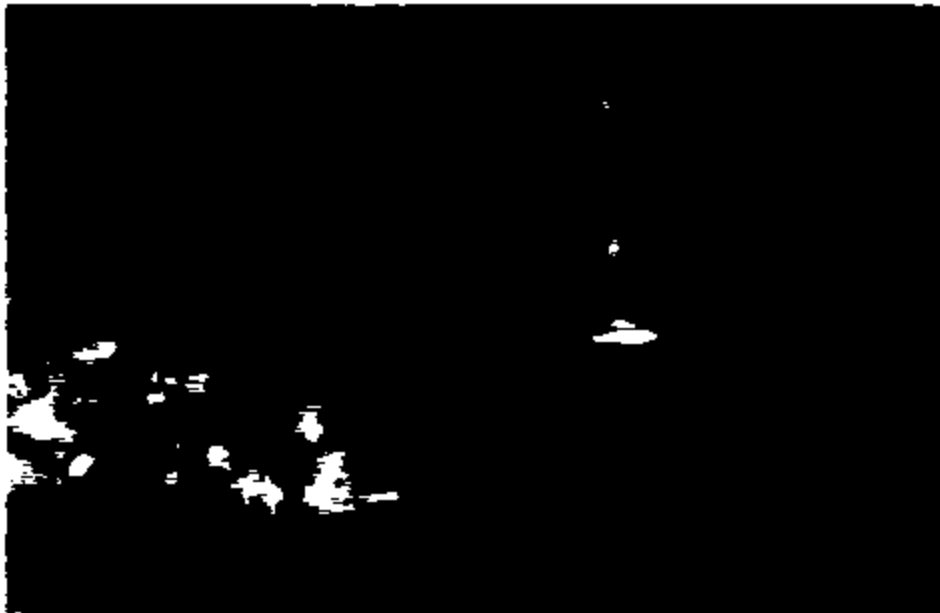


PEBA-078 C 4204

21. View of the burn pattern in reference to the deactivation switch.



22. Closer view of the burn pattern in reference to the deactivation switch.



PE04-078 C 6208

23. Another view of the burn pattern in reference to the deactivation switch.



24. View of the cruise control deactivation switch.



PE04-070 C 4205

25. Closer view of the cruise control deactivation switch.



26. View of the speed control servo.



PC94-878 C 4287

27. Closer view of the speed control servo.



28. View of the interior fuse box.

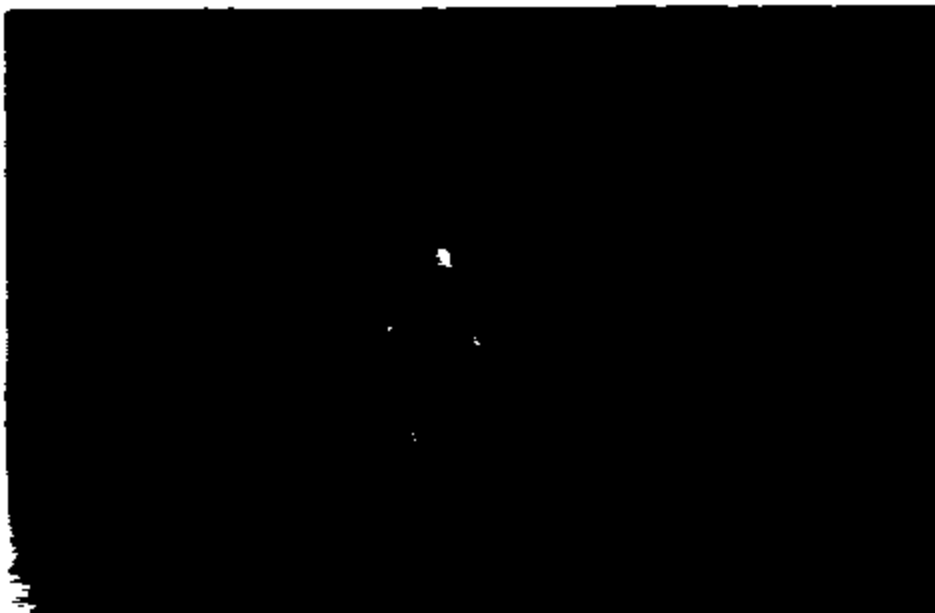


PEBA-078 C 42008

29. View of fuse No. 13.

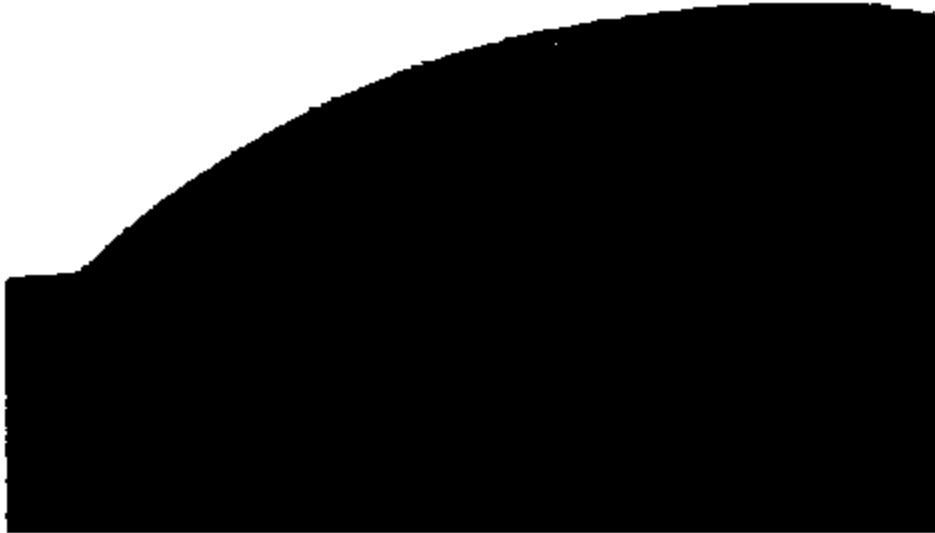


30. View of fuse No. 14.



PE04-0718 C 4200

31. View of the ABS electro hydraulic control unit.

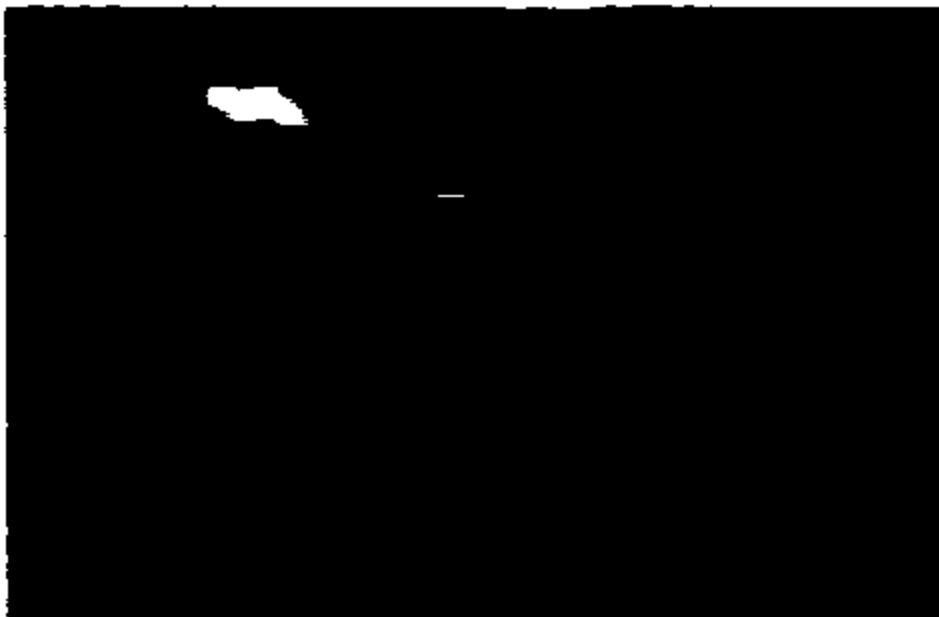


32. Closer view of the ABS electro hydraulic control unit.



PER-578 C 4218

33. View of the cruise control deactivation switch.



PEBA-070 C 4211



CONSUMER AFFAIRS
SECTION

February 18, 2004

Ford Motor Company
Attn: Consumer Affairs
P O Box 6248 MD-3nc-b
Dearborn MI 48126

FORD MOTOR COMPANY
RECEIVED
CLAIMS UNIT
FEB 24 2004
OFFICE OF THE
GENERAL COUNSEL

Re: our insured: [REDACTED]
Claim no: [REDACTED]
Date of loss: 12-20-03
Damages: Pending

Dear Consumer Affairs:

We have been informed that you are the insurance carrier for the party designated above. Our insured vehicle caught fire while parked and unoccupied; our conclusion of the investigation was electrical overheating at the cruise control deactivation switch caused the fire.

We have made payment to our insured and therefore, become subrogated to their rights of recovery. The vehicle is sitting at a salvage pool for your company to inspect the vehicle for your own investigation please contact our office and we will provide you with the information to inspect the vehicle.

Sincerely,


Stephanie Stanley
Subrogation Specialist II
281-880-2276

12/20/03
Austin TX
20 F-150
VIN
CONSUMER AFFAIRS
SECTION
FEB 23 5:34

Austin Fire Department

617 S. Pleasant Valley Road
Austin, Texas 78741

Phone: (512) 974-0196
Fax: (512) 974-0162

A) NFIRS - 1 Basic

FDID	State	Incident Date	Unit	Shift	Incident Number	Exposure
WP801	TX	12/20/2003 13:38:16	E07	C	368528	0

B) Address Information

Street Number/Name [REDACTED] ST TX Suite
 City AUSTIN State Zip Code [REDACTED] Census Tract
 Address Description
 Location Type 2 Intersection

C) Incident Type 131 Passenger vehicle fire

E) Dates / Times
 Alarm Time 12/20/2003 13:38:16
 Arrived Time 12/20/2003 13:42:44
 Controlled Time
 Last Unit Cleared 12/20/2003 14:07:09
 Day of Week Saturday

D) Aid Given or Received Type

N None
 Mutual Aid Co. Inc. Number (if obtained)

F) Action Taken

1) 11 Extinguish
 2)
 3)

G2) Estimated Property Losses & Values
 Contents Loss 0
 Property Loss 0
 Pre Incident Value
 Contents Value 0
 Property Value 1500

G1) Apparatus / Personnel Resources

	Suppression	EMR	Other
Apparatus	1	0	0
Personnel	4	0	0

H1) Casualties

	Deaths	Injuries
Fire Service Casualties	0	0
Civilian Casualties	0	0

H3) Hazardous Materials Release

H2) Detector

I) Mixed Property Use

J) Property Use 600 Street, other

K) Person(s) Involved Business Name (if applicable) Business Phone () -
 Type of Contact Contact Phone () -
 Contact Name
 Contact Address
 City State Zip Code -
 Insured Unknown Insurance Company Name

M) Authorization Signature: BRAD BALLARD Date 12/20/2003
 Officer in charge Rank Lieutenant
 Officer Reporting Rank

TX 01033592
 Attn: Jessica
 2 pgs





ALLSTATE PROPERTY AND CASUALTY INSURANCE COMPANY
P.O. BOX 168288
IRVING TX 75016
(800) 374-4246

11/27/03

CONSUMER AFFAIRS
SECTION

4 JAN -6 AM 20

FORD MOTOR CO CONSUMER AFFAIRS
PO BOX 6248
DEARBORN MI 48126

OUR INVESTIGATION INDICATES THAT YOUR INSURED WAS RESPONSIBLE FOR THIS LOSS.

SINCE WE HAVE ALREADY MADE A SETTLEMENT WITH OUR POLICYHOLDER THE CLAIM HAS BEEN ASSIGNED TO US. COPIES OF THE FINAL PAPERS RELATING TO THE LOSS ARE ENCLOSED.

PLEASE ACCEPT THIS LETTER AS NOTICE OF OUR SUBROGATION CLAIM. PLEASE FORWARD YOUR PAYMENT WITH OUR CLAIM NUMBER TO:

ALLSTATE PAYMENT PROCESSING CENTER
P.O. BOX 227257
DALLAS, TX, 75222-7257

DIRECT ANY OTHER CORRESPONDENCE TO THE ADDRESS AT THE TOP OF THIS LETTER.

SINCERELY,

SUBROGATION CLAIM REP

ALLSTATE PROPERTY AND CASUALTY INSURANCE COMPANY

CE:G

YOUR FILE NO. : [REDACTED]
YOUR INSURED : FORD MOTOR CORPORATION
ADDRESS : PO BOX 6428 MD-3NE-S
DEARBORN MI 48126

OUR CLAIM NO. : [REDACTED]
OUR INSURED : [REDACTED]
LOSS DATE : 08/27/03

LOCATION :
INSO HOME

RICHMOND TX

AMOUNT OF LOSS: \$15,000.00

FEB4-878 C 4215

Handwritten notes:
- 8/7/03
- \$15,000.
- Richmond, TX
- WF-150
- VIN 61002-22



State Farm Lloyds

Fire Subrogation Office
6222 BELTLINE ROAD, SUITE 150
IRVING, TX 76063

August 27, 2004

Fax: 313-845-4089
Sean Nortson
Ford Motor Company
3 PARKLANE BLVD STE. PTW 300
DEARBORN, MI 48126

50647

RE: Claim Number: [REDACTED]
Date of Loss: July 25, 2004
Our Insured: [REDACTED]
Amount of Loss: \$In Excess of \$75,000.00
Location of Loss: 6495 LOST HOLLY SAN ANTONIO TX 78240-4940

Dear Sean:

We are writing to you regarding damage to our insured's property at the above location. Our investigation determined the cause of loss to be Fire originating in a Ford motor vehicle. The damage includes residence and personal property.

Our initial investigation indicates you are responsible for the damages. We have indemnified our insured for the loss, and are looking to you for reimbursement of the claim amount above.

If you have liability insurance, please forward our correspondence to your insurance company for discharge of your obligation. If you do not have insurance, please contact me at your earliest convenience to discuss other options.

In order to assist you in evaluating and processing the subrogation claim we are asserting, we may provide nonpublic personal information about our customer. We are sharing this information to effect, administer, or enforce a transaction authorized by the consumer. However, you are neither authorized nor permitted to: (1) use the customer information we provide for any purpose other than to evaluate and process the subrogation claim, or (2) disclose or share the customer information we provide for any purpose other than to evaluate and process the subrogation claim.

FEB4-878 C 4217

HOME OFFICE: DALLAS, TEXAS 75379-8100

Page 2
August 27, 2004

Thank you for your prompt attention to this matter. I may be reached at the number listed below.

Sincerely,



Scott Mendenhall
Claim Representative
(214) 296-8838

State Farm Lloyds⁺

PS: We are currently determining the amount of damage. It is my understanding you have been in contact with [REDACTED] with Geico, their Claim # [REDACTED] telephone number is [REDACTED]. The vehicle is in storage in San Antonio. I will mail to you estimates and documentation as they become available.

Action Detail

VIN: 1ETR07W11K [REDACTED]	Year: 2001	Model: F-SERIES	Case: 604602094
Name: [REDACTED]	Owner Status: Original	WBI: 2000-07-12	
Symptom Desc: FIRE/SMOKE VISIBLE FLAME		Primary Phone: [REDACTED]	
Reason Desc: LEGAL - FIRE CLAIM		Secondary Phone: [REDACTED]	
Issue Type: 07 LEGAL	Issue Status: CLOSED	Dealer: JENNINGS ANDERSON FORD	
Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION		P & A Code: 04424	
Action Desc: REDIRECT TO OGC - PROPERTY DAMAGE OVER \$10,000			
Odometer: 90000 MI	Comer Type: PHONE		
Action Date: 07/28/2004	Action Time: 10:58:29:857	Action Date: No	
Analyst Name: FONSECA, LOURDES NEARON (L.C.)	Analyst: LFONSECA		

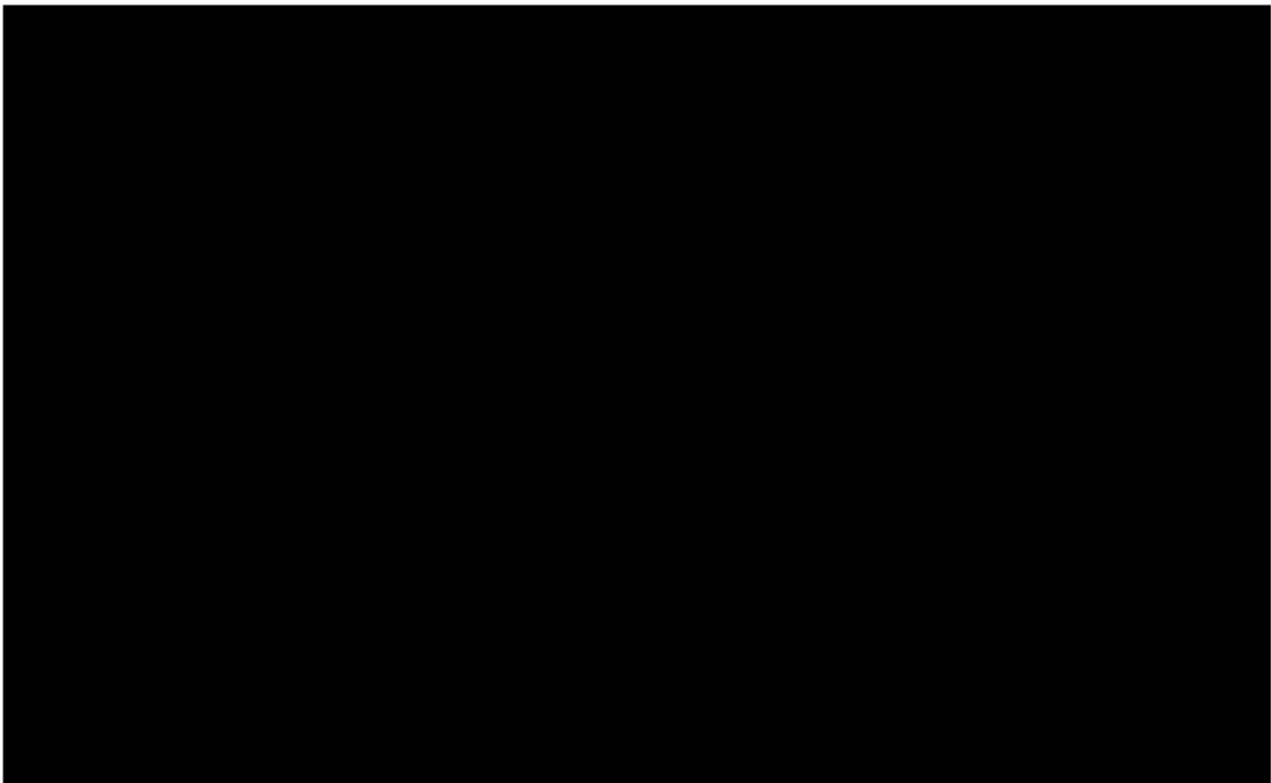
COMMENTS: CUSTOMER ALLEGES VEHICLE FIRE CAUSED GARAGE AND HOUSE DAMAGE, APPROX \$48,000 WORTH OF PROPERTY DAMAGE. LPA WILL FORWARD REQUEST TO OGC.

Action Detail

VIN: 1ETEM7ZW1K [REDACTED]	Year: 2001	Model: F-SERIES	Case: 804502094
Name: [REDACTED]	Owner Status: Original	WSD: 2000-07-12	
Symptom Desc: FIRE/SMOKE VISIBLE FLAME		Primary Phone: [REDACTED]	
Reason Desc: LEGAL - FIRE CLAIM		Secondary Phone:	
Issue Type: 07 LEGAL	Issue Status: OPEN	Dealer: JENNINGS ANDERSON FORD	
Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION-FD		P & A Code: 04424	
Action Desc: OPEN LEGAL CONTACT - PRODUCT LIABILITY		Call: [REDACTED]	
Odometer: 90000 MI	Comm Type: FAX		
Action Date: 07/27/2004	Action Time: 16:47:30:430	Action Date: No	
Analyst Name: LECH,CHERIE	Analyst: GLEICH		

COMMENTS: *****PRODUCT LIABILITY***** FAX RECEIVED 7-27-04, DEALER CONTACT [REDACTED]
 [REDACTED] CUSTOMER ALLEGES THE VEHICLE CAUGHT FIRE DUE TO AN ELECTRICAL SHORT. CUSTOMER REQUESTS CONTACT FROM FORD REPRESENTATIVE.

*Personal Property damage
 \$40,000
 house & garage*





AMERICAN FAMILY INSURANCE GROUP

550 POLARIS PARKWAY SUITE 100 • WESTERVILLE OH 43083 • PHONE: (614) 754-9770

CONSUMER AFFAIRS
SECTION

Tuesday, July 20, 2004

Ford Motor Company
Attn: Consumer Affairs
PO Box 8248, MD-3NE-B
Dearborn, MI 48126

4 JUL 28 09:20

RE: Our Insured: [REDACTED]
Our Claim Number: [REDACTED]
Date of Loss: July 11, 2004
Your owner: [REDACTED]
VIN: 1FTRX17L7YH [REDACTED]
Damages: \$17,760.88 (pending)

FORD MOTOR COMPANY
RECEIVED
CLAIMS UNIT
JUL 28 2004
OFFICE OF THE
GENERAL COUNSEL

Dear Ford Motor Company:

We are notifying you of a potential claim against you for the above vehicle, a 2000 Ford F150. This vehicle caught fire from an apparent electrical malfunction. Should you wish to inspect the vehicle please notify us within 5 days of receiving this letter. It may be moved at that time. The above damages are not finalized and may increase once work is started.

We are currently in the process of investigating the loss and once the investigation is complete we will inform you of the amounts due.

If you have any additional questions you may reach me at 513-722-3974

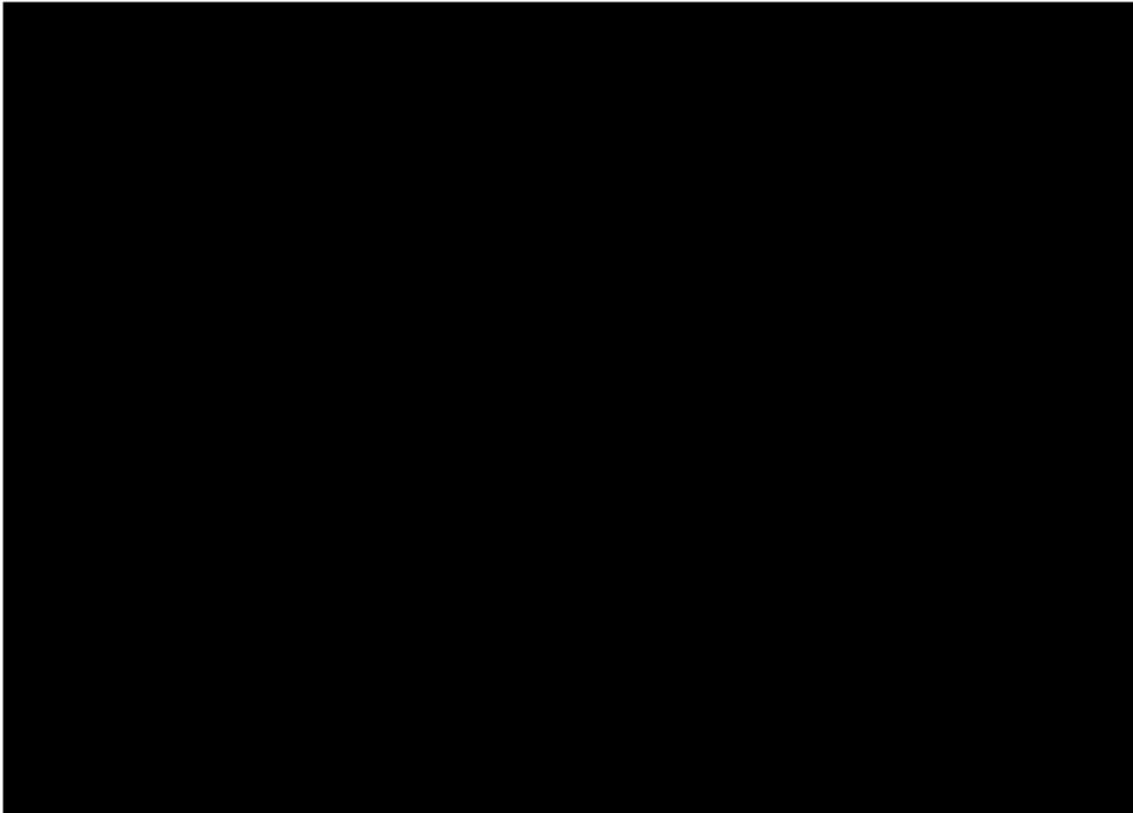
Respectfully,

Jeffrey Morehouse
Property Claims Analyst
PO Box 640
Milford, OH 45150

- 7/11/04
- 100 F-150
- VIN
- \$17,760.88

Ohio Fraud Warning: "Any person, who, with intent to defraud or knowing that he/she is facilitating a fraud against an insurer, submits an application or files a claim containing a false or deceptive statement is guilty of fraud".

...





ZURICH

CONSUMER AFFAIRS
SECTION

March 16, 2004

Ford Motor Company Customer Services Center 4 MAR 23 A9:23
P.O. Box 6248
Dearborn, MI 48126

RE: Claim #: [REDACTED]
Insured: [REDACTED]
Date of Loss: 03/06/04
Claimant: [REDACTED]

FORD MOTOR COMPANY
RECEIVED
CLAIMS UNIT
MAR 24 2004
OFFICE OF THE
GENERAL COUNSEL

Zurich North America

Dear Ford Motor Company Customer Services Center:

Claims
P.O. Box 30729
Tampa, FL
33633-1254

Please be advised that we are the general liability carrier for [REDACTED] Inc. The purpose of this letter is to place you on notice of this claim and to make a demand upon you to assume the defense and indemnity of our named insured at your sole cost and expense.

Telephone (800) 239-4781
Fax (800) 333-8004
<http://www.zurichna.com>

The letter is to inform you that our vehicle, a 2000 Ford F150 Vin JFTRX07LSY [REDACTED] caught fire for an unknown reason, while parked in owners driveway..

If you fail, refuse, or neglect to undertake the defense and indemnity of our insured, you will be deemed bound by the results of the trial should one result thereafter, and an action will be brought against you by our insured for the amount of the judgment, interest, court costs, investigative and trial expenses, and attorney's fees, all of which were necessarily incurred as a result of your failure to take over the defense and handling of this claim.

If you have not already done so, please refer this matter to [REDACTED] insurance carrier immediately.

- 3/6/04
- 100 F150
- VIN

March 16, 2004

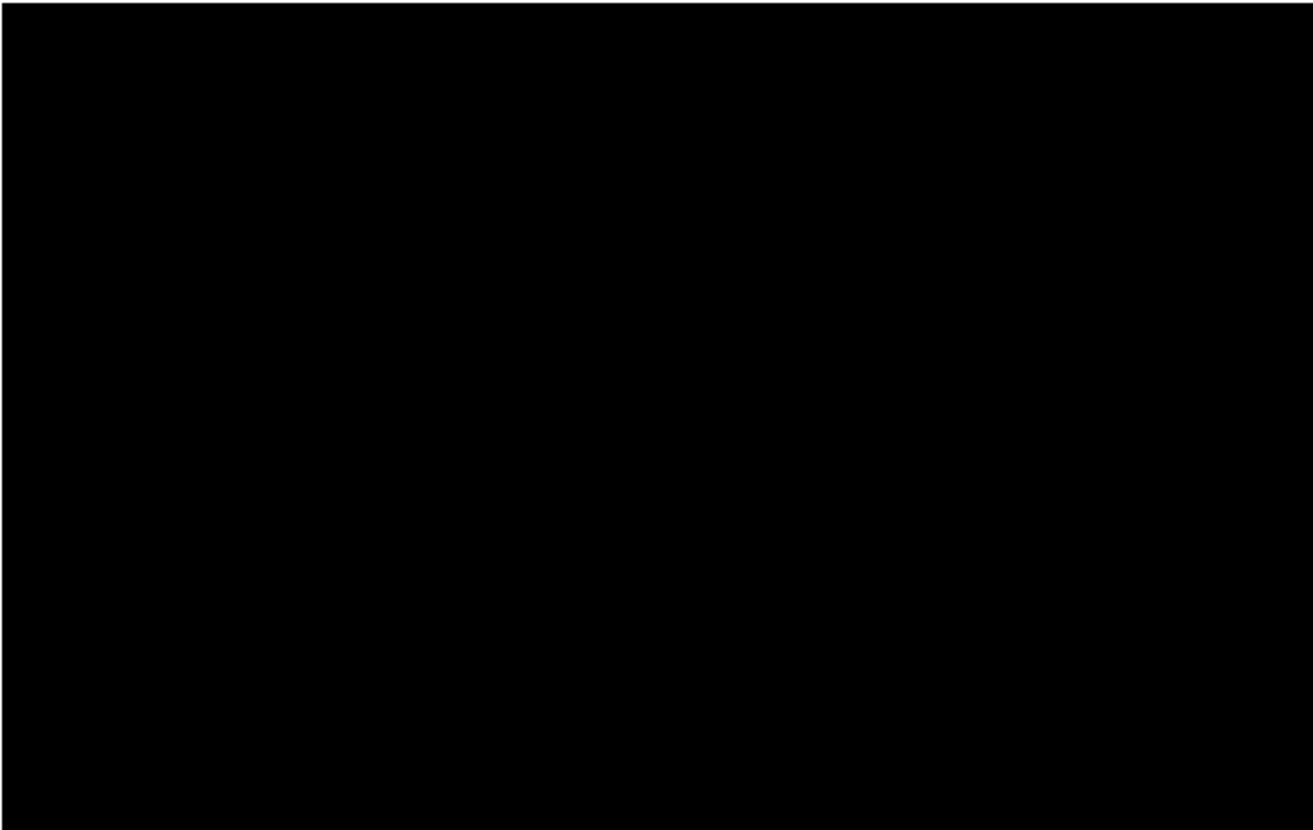
Page 2

If you have any questions, please contact me. Please include our claim number on all forms of communication.

Very truly yours,
Maryland Casualty Company

Tonya Gansey

Tonya Gansey
CLAIM CASE MANAGER
800-239-4781 ext 3724



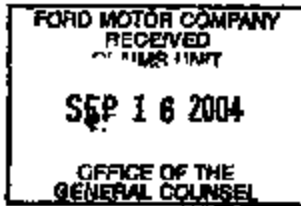
MICHAEL B. JOLLY
ATTORNEY AT LAW

1819 WESTON, 4th FLOOR
HOUSTON, TEXAS 77002
MICHAELB@JOLLYATTORNEY.COM

OFFICE (713) 237-8385
FAX (713) 237-8380
mjb@jolly.com

ga New
SEP 15 2004

September 15, 2004



Eric Meyer
Brian Melton

Via Fax: 713-654-6666

Andrew Schirrmelster
Dawn S. Speer

Via Fax: 713-228-3510

Alexis Koenig

Via Fax: 956-541-2170

Kathleen Horvath

Via Fax: 248-203-0763

RE: [REDACTED]
FM 463 South Moon Field
Mission, Texas

Dear Counsel:

[REDACTED] house partially burned down due to a fire which originated from their 2001 Ford F150. The fire occurred on June 20, 2004. You are welcomed to inspect the house and the vehicle within the next few days. Please inform me of the date and time you wish to inspect my client's house and vehicle along with the identity of those who will attend.

Sincerely,
Michael Jolly
Michael Jolly

MJB