



EA85-885-LC-7368

↑  
Crease in  
floorboard where  
part exploded  
into the truck

↑  
Crack  
where  
part  
hit

↑  
Crack  
where  
fire  
erupted  
from







ERG-005-LC-7382





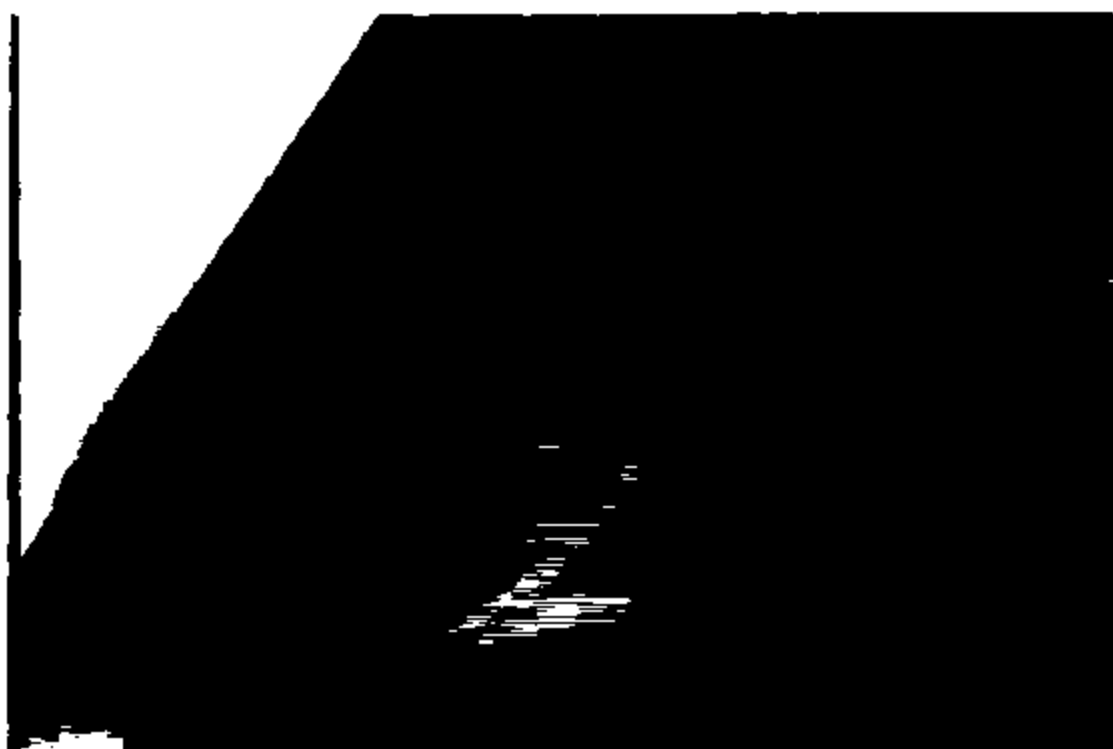
ER05-025-LC-7594











EA05-015-LC-7588





EA25-005-LC-7500

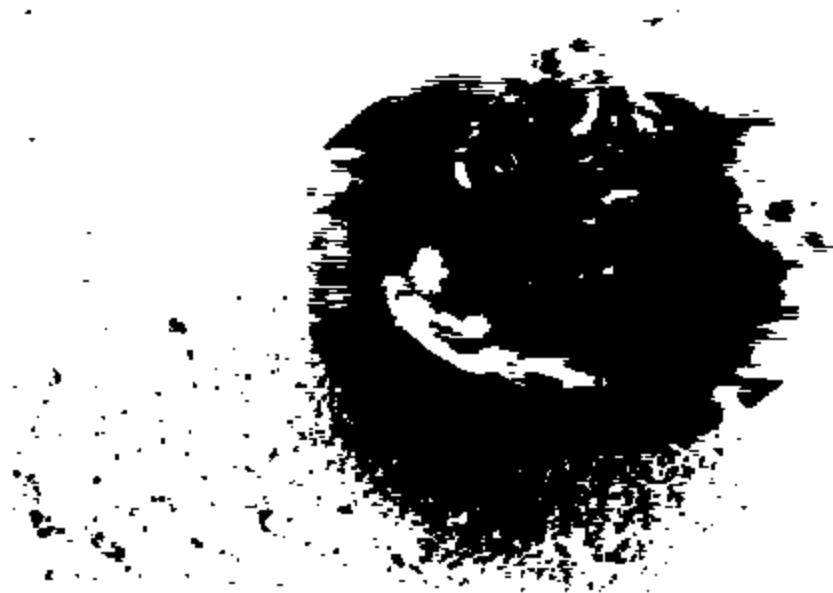


PART THAT  
EXPLODED















BEGINNING OF CONTACT  
01/17/2001

MASTER OWNER RELATIONS SYSTEM III

08.33.13

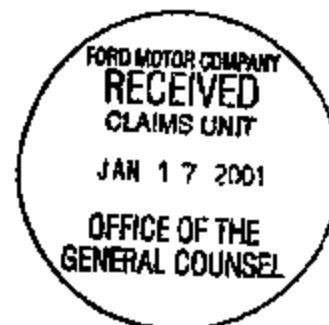
INQUIRY ISSUE CASE NBR: 1480390869  
ZONE: OPENED: 01/16/2001  
VIN: 1FMYU2ZE3NU ENGINE: E VEH TYPE: T CLOSED: 01/16/2001

LAST NAME: FIRST NAME: STATUS: CLOSED  
TITLE: MI:  
ADDRESS: CHICAGO STATE: IL ZIP:  
HOME PHONE: MODEL: EXPLORER SPORT 4X2 2-DOOR  
MODEL YEAR: 1999 MILEAGE: 33000  
DEALER NAME: SALES CODE: P & A:  
REASON CODE: 0703 LEGAL - ALLEGED SERIOUS INJURY  
SYMPTOMS:

ORIGIN: CAC138 - US CONCERN CASE BASE COMMUNICATION: MAIL  
ACTION: 679 - INFO WILL BE SENT TO PROD CLAIMS GRP; CUST WILL BE CONTACTED W/IN  
DOCUMENT: ANALYST: MDOOLAT MICHAEL DOOLAT  
ACTION DATA/COMMENTS:

2001/01/16  
12.25.39

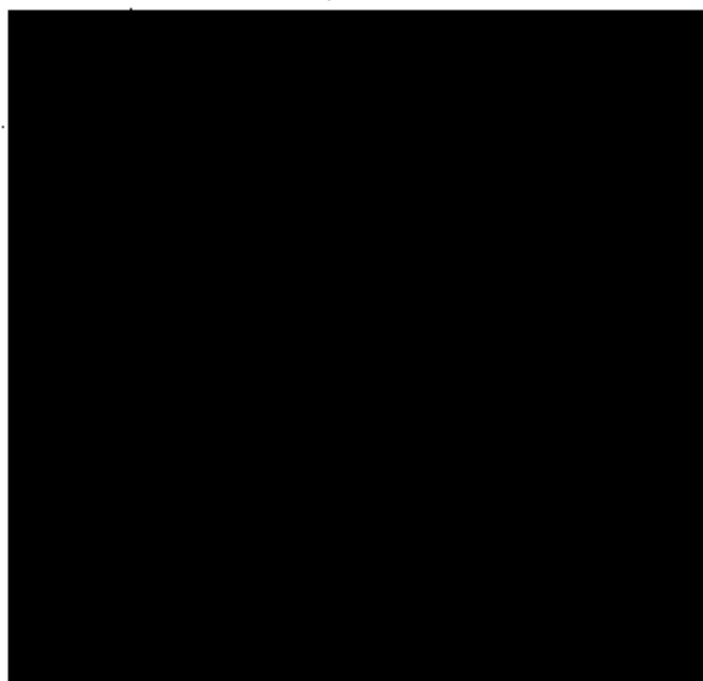
CUSTOMER SAYS: LETTER DATED DEC 20,00 -CUST SAYS THAT ON  
DEC 14, AT 8 AM VEH CAUGHT ON FIRE WHILE IN THEIR DRIVE WAY  
-CUST SAYS THAT HE WAS STUCK IN THE SNOW AND SO USED A PIECE  
OF WOOD TO PUT UNDER THE BACK PASSENGER TIRE SO THAT HE COULD  
REVERSE ONTO -CUST SAYS FROM THERE ON THINGS HAPPENED HE  
HEARD AN EXPLOSION UNDER THE CENTER CONSOLE BTWN THE TWO FRONT  
SEATS, THIS EXPLOSION CAUSED A CRACK IN THE METAL FLOOR SO  
ARD WHICH SHOT A FLAME UP NEAR CUST HEAD, A FLAME WAS NOT AHEAD  
D IT PROCEEDED TO THE REST OF THE VEH -CUST NOT SECOND DRIVER  
BE BURNS -CUST WANTS COMPENSATION PER CUSTOMER, DEALER SAYS:  
-NONE CAC ADVISED: - WE WILL SEND THE INFORMATION TO  
OUR PRODUCT CLAIMS GROUP - SOMEONE WILL CONTACT YOU IN 7-  
10 BUSINESS DAYS INFERENCE CASE ID: 4722



OWNER RELATIONS

01/17/2001 MNFAXPRG

2005-025-1C-7000



# State Farm Insurance Companies



October 30, 2000

IRVING FIRE CLAIM OFFICE  
1901 W. Irving Blvd.  
P.O. Box 154409  
Irving, Texas 75015

Ford Motor Company  
3 Park Lane Blvd. #400  
Dearborn, MI 48126

Attn: Claims Department

RE: Our Insured: [REDACTED]  
Claim #: [REDACTED]  
Date of Loss: 9-9-00

Dear Sir/Madam:

On September 28, 2000, I sent the attached letter to Gene Messer Ford of Amarillo. As that letter explained, our insured's two week old Ford Ranger caught on fire while their son was travelling to California from Texas. Not only was the vehicle destroyed by the fire, but so were his personal possessions, as he was going to California to attend college.

Our initial investigation has determined that Ford Motor Company is responsible for this fire. We have indemnified our insured and are asking that you reimburse us for the amount we have paid, which is \$ 6,850.00.

In addition, our insured had an additional loss which was not covered by their insurance policy as the total amount of the loss exceeded the policy limit for an off premises loss.

I would appreciate a contact from you regarding this subrogation demand. I can be reached Monday through Friday at 972-986-4639.

Your immediate attention to this inquiry is appreciated.

Sincerely,

*Jennifer Camp*  
Jennifer Camp

Claim Specialist  
State Farm Lloyds

JC/bhs



52425732

**Newberry Springs Fire Department**  
**BUREAU OF FIRE PREVENTION AND INVESTIGATION****P. O. BOX 2**  
**NEWBERRY SPRINGS, CA 92365**  
**(760) 257-9124**  
**CA 9364800**

DR: 00-026940

DATE: September 9, 2000

LOCATION: Westbound I-40 @ M.P.31

INVESTIGATOR: Worsey, D. A. 6001

**Background:**

Newberry Springs Fire was dispatched to the above location for a reported vehicle fire at [REDACTED] from Station 392 responded at [REDACTED] First engine on scene at [REDACTED] reporting a pickup truck fully involved approximately [REDACTED] Driver of vehicle suffered second degree burns to fingers and hands. Dry dressings applied on scene; driver refused transport to [REDACTED] by ambulance.

Driver was interviewed who related the following information. Driver stated that he was driving westbound and noticed smoke in his mirror. He stopped the vehicle, got out and tried to remove the clothing from the back of the pickup. The tarp covering the load had caught fire and he suffered burns to his fingers from the melting tarp. Driver believed that the fire started in the cargo area of the truck. Fire [REDACTED] reported that the vehicle fire was difficult to extinguish due to gasoline leaking from the engine area under the vehicle.

This vehicle was removed by Silver Valley Towing in Newberry Springs and stored in their yard. On 9-12-00 I proceeded to the location to conduct an investigation into the cause and origin of this fire. The vehicle involved is a 2000 FORD Ranger. The color of the vehicle was red; remains of the factory paint were found on the right rear of the vehicle. Written notes in the tow records show a VIN of 1FTYR14V6Y [REDACTED], and Texas License # [REDACTED] VIN verified by locating VIN on vehicle frame. License # verified by locating license plate in cargo area of vehicle. Vehicle was purchased on 8-26-00.

**Investigation:**

Exterior examination of the vehicle [REDACTED] at tires burned from the rims, the hood is missing, plastic and fiberglass components of the front end are burned. The left rear tire is heat damaged and flat. Sidewall is intact enough to indicate that the tire is a Firestone Wilderness brand. The right rear tire is intact and holding air.

The cab of the vehicle is gutted; the dashboard and instrument cluster is completely destroyed. Steering wheel is off the steering column. Behind the drivers seat are the power steering pump and the air conditioner compressor. Both show heat damage and were picked up off the road surface by the tow truck driver and placed in the cab.

The wiring was inspected for evidence of short circuits or over-current. All insulation is burned off, wires are supple and no fusing or pointing was noted. The battery case was destroyed but the plates are still in place in the battery box.

The engine was inspected next. The alternator has melted from its mounting bolts. The ignition coil has been destroyed. The fuel injection system shows signs of melting. The fiberglass rocker arm cover on the passenger's side has been burned away exposing the rocker arms. There is some damage to the rocker arm cover on the driver's side, but not as extensive. The fuel line appears intact to the fuel injection system.

The injector bar was examined and it was noted that part of the bar appears to be bright and off color. The mounting base for the injector bar was removed after photographs were taken of the engine, and was inspected. The section of the injector bar under the coil base is bright as opposed to the end of the bar (closest to the back of the engine) which is covered with soot. This bright area of the injectors suggests that fuel was leaking or spraying from this area during the fire.

#### Photographs:

Photographs in the form of color slides taken on 9-12 and 9-13-2000 using reference scales when appropriate.

#### Opinion/Conclusion:

Based upon statements made by the victim, firefighters on scene and my investigation it is my opinion that this fire started in the engine area and was a fuel fire. It is my opinion that a mechanical malfunction of the fuel injection system caused gasoline to spray onto the engine and the resulting vapors found an ignition source, most likely the ignition coil, and ignited. It is not known if the driver of the vehicle had turned the ignition switch off when he stopped the vehicle. If the ignition switch had been left on, the electric fuel pump would continue to pump gasoline to the injection system which would in turn supply more fuel to the fire. Additionally, heat from the fire could cause gasoline in the fuel tank to expand and flow up the fuel line and spray out causing the fire observed under the engine area by the suppressor. This fire is accidental in cause and origin.

MEFF#: 20

Claim#: [REDACTED]

Name: [REDACTED]

Slide 1: 1.JPG

Slide 2: 2.JPG

COMPLETE BURNOUT



Slide 3: 3.JPG

Slide 4: 4.JPG



MEFF#: 2019 Claim#:

Name:

Slide 5: 5.JPG

Slide 6: 6.JPG



REC'D 11-1-1983

EROS-085-LC-7814



IN THE STATE COURT OF COBB COUNTY, GEORGIA, CIVIL ACTION #1

PLAINTIFF: [REDACTED]

(Our File #234-6798)

VS

DEFENDANT: Ford Motor Company

2004A 10994-6

COMPLAINT FOR TORT OF NEGLIGENCE (PRODUCT LIABILITY)

STATEMENT OF FACTS

[REDACTED] (Our File #234-6798) (hereinafter referred to as "Plaintiff") files this Complaint for damages against Defendant Ford Motor Company, and respectfully shows the Court as follows:

1. Defendant Ford Motor Company (hereinafter referred to as "Defendant") is a foreign profit business corporation registered to do business in the State of Georgia. Said Defendant may be served with process through its registered agent in the State of Georgia to-wit: Corporation Process Company, 180 Cherokee Street, N.E., Marietta, Cobb County, Georgia 30060.
2. Defendant designed, tested, manufactured, assembled, inspected, marketed, distributed and warranted a 1996 Ford Bronco VIN: 1FMEU15H4TLB57804 (hereinafter "said product") prior to March 29, 2003.
3. Said product was purchased in the stream of interstate commerce prior to March 29, 2003 by Paul Fincher and Loretta Fincher (hereinafter "Plaintiff's Insured").
4. Thereafter, Plaintiff's Insured used said product for its intended purpose without abuse and without modification.
5. On or about March 29, 2003, said product caught fire and was damaged in the amount of \$13,783.95 as a result of a malfunction of the fuse block or the electric circuitry (hereinafter "said defective part" manufactured by Defendant and installed on said product by Defendant).
6. As a result of the casualty described in the previous paragraph, property owned by Plaintiff's Insured was damaged in the amount of \$13,783.95 (salvage is undetermined).
7. Subsequent investigation revealed that Defendant had negligently designed; negligently tested; negligently manufactured; negligently assembled; negligently inspected; negligently marketed; negligently distributed said product in a defective condition at the time of first distribution and sale for use.
8. Subsequent investigation revealed that Defendant's negligence described in the previous paragraph was the proximate cause of the casualty described above and of the damages described above.

of \$13,783.95 (salvage is undetermined) for damages caused by the defective part.

10. Plaintiff is subrogated to all rights and interest in the claim against Defendant as a result of making payments to Plaintiff's Insured under a policy of insurance.

11. Plaintiff has served Defendant a copy of: (a) Plaintiff's First For Admissions To Defendant; (b) Plaintiff's First Interrogatories to Defendant; and, (c) Plaintiff's First Request For Production of Documents To Defendant with the summons and complaint pursuant to O.C.G.A. 9-11-4(a)-(g).

12. Plaintiff has served Defendant a copy of: (a) Notice of Plaintiff's Desire To Settle This Litigation; (b) Notice of Plaintiff's Intention To Seek Attorney's Fees In The Event of A Default By Defendant; (c) Notice of Plaintiff's Intention To Seek Interest; (d) Notice of Service of Discovery Materials; and, (e) Notice of Conditional Stipulation For Extension of Time For Defendant with summons and complaint pursuant to O.C.G.A. 9-11-4(a)-(g).

**COUNT A: TORT OF NEGLIGENCE DESIGNING; NEGLIGENCE TESTING;  
NEGLIGENCE MANUFACTURING; NEGLIGENCE ASSEMBLY; NEGLIGENCE INSPECTION;  
NEGLIGENCE MARKETING; AND, NEGLIGENCE DISTRIBUTION**

13. Plaintiff herein incorporates by reference the allegations contained in paragraphs 1 through 12 as if set forth herein.

14. Plaintiff shows that said defective part in said product, which was designed, manufactured, distributed and sold by Defendant was in a defective condition at the time of the first distribution and sale for use. Plaintiff shows that the defective condition existing in said product included, but was not limited to:

a. A defective design of the defective part installed in said product.

b. The failure to warn and to continue to warn users, purchasers and registered owners of such products, by letter, recall notice, or other reasonable means, of the dangerous characteristics and properties of the defective part Defendant had a duty to exercise reasonable care to design, test, manufacture, assemble, inspect, market, and distribute safe products, so as to not subject purchasers or users or innocent third parties to an unreasonable risk of harm.

15. Defendant breached its duty to exercise reasonable care with respect to said product and defective part.

16. Defendant was negligent and acted in a willful and wanton manner in designing, testing, and/or manufacturing, inspecting, marketing, distributing and selling the installed defective part in such a manner and in such condition as to make said product inherently dangerous and defective.

17. Defendant's defective product failed as a result of the negligence of Defendant described in this Count so that Defendant's

negligence was the proximate cause of the incident and resulting damages described above in the STATEMENT OF FACTS section of Plaintiff's complaint; and, said incident and said damages was reasonable perceivable by Defendant at all times relative to Plaintiff's complaint.

**COUNT B: STRICT LIABILITY OF DEFENDANT**

18. Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 17 as if fully set forth herein.

19. Defendant is strictly liable in tort to Plaintiff for the losses suffered by Plaintiff because the defective part installed in said product was defective when distributed and sold by Defendant, was not merchantable and was not reasonably suited to the use intended, said defective condition having existed at the time of sale. Specifically, Plaintiff shows that the defects existing in the defective part installed in said product include, but are not limited to, defects in design and engineering of the defective part installed in said product, defects which were unreasonably dangerous and pose an unreasonable risk of serious injury or death to the users of said product due to malfunctions of said product resulting from defective design and manufacture of the defective part.

20. Plaintiff further shows that Defendant failed to utilize economical and technically available safety design alternatives insofar as the design of the defective product is concerned.

21. Defendant's defective product failed as a result of the negligence of Defendant described in this Count so that Defendant's negligence was the proximate cause of the incident and resulting damages described above in the STATEMENT OF FACTS section of Plaintiff's complaint; and, said incident and said damages was reasonable perceivable by Defendant at all times relative to Plaintiff's complaint.

**COUNT C: BREACH OF EXPRESS AND IMPLIED WARRANTIES BY DEFENDANT**

22. Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 21 as if set forth verbatim herein.

23. The defective part installed in said product was not merchantable, nor was it reasonably suited for the use intended, and as such, Defendant breached the express and implied warranties of fitness for a particular purpose and of merchantability in that the defective part in said product posed an unreasonable risk of serious injury and death to its users due to the defective design of the defective part which allowed for the malfunction of said product.

24. Defendant's defective product failed as a result of the negligence of Defendant described in this Count so that Defendant's negligence was the proximate cause of the incident and resulting damages described above in the STATEMENT OF FACTS section of Plaintiff's complaint; and, said incident and said damages was

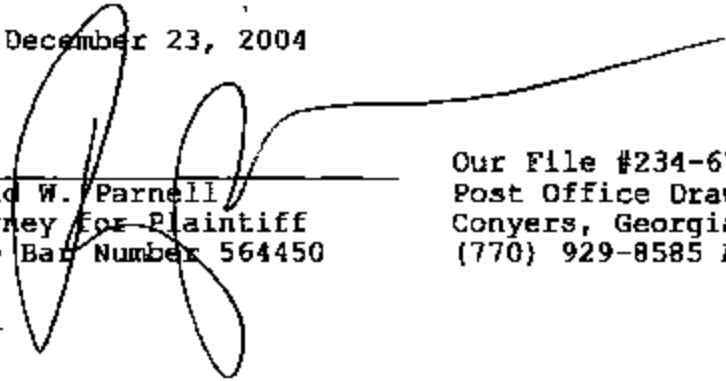


reasonable perceivable by Defendant at all times relative to Plaintiff's complaint.

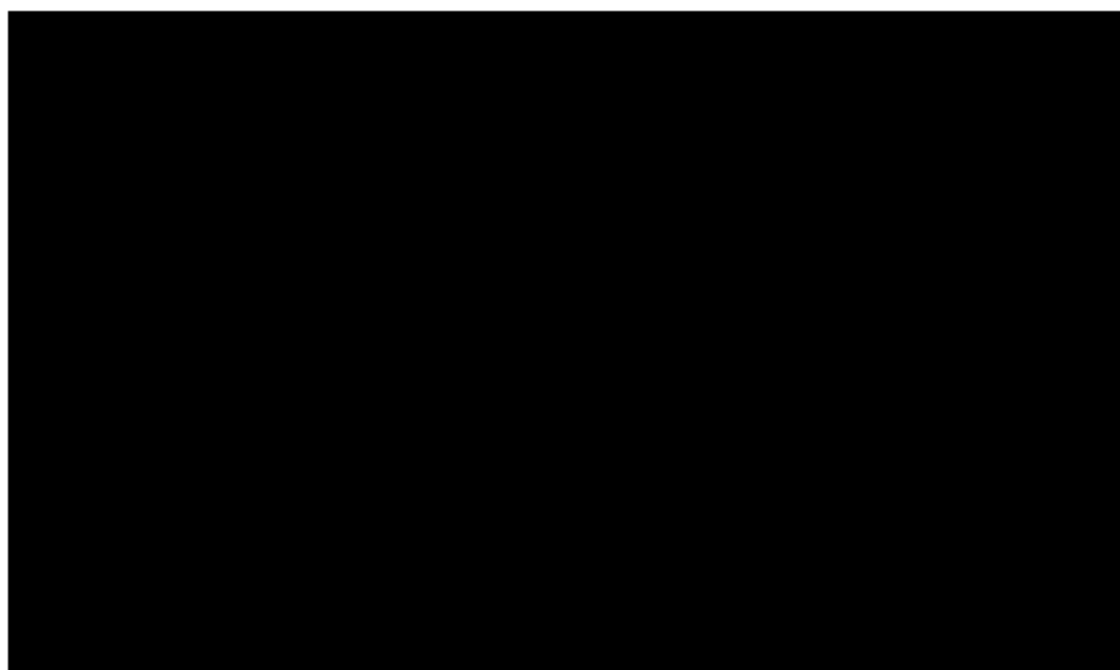
II. PRAYER FOR RELIEF AND DAMAGES

WHEREFORE, Plaintiff demands judgment against Defendant in the amount of \$13,783.95 (salvage is undetermined), plus 3% pre-judgment interest, one-third attorney fees in the event of default, costs and 3% post-judgment interest; and that a writ of fieri facias issue commanding all Sheriffs within the State of Georgia and their lawful deputies to execute said writ by levy and seizure of Defendant's goods and lands.

December 23, 2004

  
\_\_\_\_\_  
Ronald W. Parnell  
Attorney For Plaintiff  
State Bar Number 564450

Our File #234-6798  
Post Office Drawer 81085  
Conyers, Georgia 30013  
(770) 929-8585 Answer Service



**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
FIRST MUNICIPAL DISTRICT COUNTY DEPARTMENT**

[REDACTED]  
[REDACTED]  
[REDACTED] Plaintiff,

vs.

FORD MOTOR COMPANY,

Defendant.

Cause No.

Amount claimed: \$23,221.83

Plus costs

Return Date: March 1, 2002

**COMPLAINT AT LAW**

Plaintiff [REDACTED]

[REDACTED], by its attorneys, COSBY, OLTMAN & BELL, P.C.

complaining of Defendant, FORD MOTOR COMPANY, states:

**General Allegations Common to All Counts**

1. Plaintiff, [REDACTED], was at all times relevant, the insurer of [REDACTED] who resided at [REDACTED] Villa Park, Illinois [REDACTED] under a policy of insurance, Policy number [REDACTED]
2. Plaintiff, STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY, is pursuing this action as bona fide subrogee of [REDACTED] having paid good and valuable consideration to her as a result of the damages complained of herein. See Exhibit A.
3. Defendant, FORD MOTOR COMPANY, is a corporation doing business in the State of Illinois, and was engaged in the business of designing, manufacturing and selling vehicles for use to the general public in Illinois.
4. On and before April 25, 2001, Plaintiff's subrogor was the title holder / owner of a 1999 Ford E-150 van, with Vehicle Identification Number (VIN) 1FDR14WXXH [REDACTED] which was insured by plaintiff, [REDACTED]

5. On or about June 13, 1999, the subject vehicle was purchased new from Packey Webb Ford, located at 1830 East Roosevelt Road, Wheaton, Illinois 60187. A copy of the purchase agreement dated June 13, 1999 is attached at Exhibit B.

6. Upon information and belief, when the subject 1999 Ford E-150 van was purchased, Plaintiff's insured [REDACTED] also purchased a "Premium Care" 60 month/60,000 mile manufacturers warranty for \$610.00. The expiration date on the warranty was February 18, 2004. See Exhibit C.

7. Upon information and belief, the subject vehicle was properly maintained and oil changes were secured regularly.

8. On April 25, 2001, for about four hours prior to the time of the fire, the subject vehicle was parked in the insured's driveway at their residence with keys removed from the ignition and no accessories were being used, when a fire began. At the time of the fire, the vehicle had been driven 24,140 miles.

9. On April 25, 2001, a fire occurred in the engine compartment area of the 1999 Ford E-150 van, with Vehicle Identification Number (VIN) 1FDR14WXXH [REDACTED] causing certain damages.

10. The origin of the fire causing damage to the 1999 Ford E-150 van, with Vehicle Identification Number (VIN) 1FDR14WXXH [REDACTED] was within the engine compartment, and specifically at the positive battery cable, where there was electrical faulting sufficient to ignite the wiring insulation and immediate combustibles into open flame.

11. The cause of the fire was due to electrical faulting in the installed positive battery cable wiring, which resulted in a short to ground, igniting, and burning the wiring insulation and adjoining combustibles, causing various and specific damages to plaintiff's insured's vehicle.

12. Upon inspection of the engine compartment after the fire, it was discovered that the bracket that secured the battery cables was missing, which would have allowed for the cables to have

become loose and shift and chafe, causing a short to ground, and subsequently, a fire.

13 As a direct result of the fire, the plaintiff suffered damages to property.

**Count I - Breach of Express Warranty**

1. - 13. Plaintiff, [REDACTED], as Subrogee of [REDACTED] adopts and re-alleges paragraphs 1 - 13, inclusive, of the General Allegations Common to All Counts, as paragraphs 1 - 13, inclusive, of this Count I, against Defendant, FORD MOTOR COMPANY.

14. On and before April 25, 2001, Defendant, FORD MOTOR COMPANY, designed, manufactured and distributed the subject 1999 Ford E-150 van, with Vehicle Identification Number (VIN) 1FDR14WXX1[REDACTED].

15. Defendant, FORD MOTOR COMPANY, designed, manufactured and distributed the subject vehicle in the regular course of business for sale to the general public.

16. At the time of the sale of the vehicle, Defendant, FORD MOTOR COMPANY, provided an express written warranty and an extended service contract covering the subject 1999 Ford E-150 van, with Vehicle Identification Number (VIN) 1FDR14WXX1[REDACTED] which extended certain coverages for 60 months or 60,000 miles. A true and accurate copy of the complete warranty agreement is not in possession of plaintiff.

17. The electrical arcing and fusing and fire in the subject vehicle occurred within 60 months and 60,000 miles of the warranty's inception.

18. The Defendant, FORD MOTOR COMPANY was placed on notice of the loss and a demand for payment of the damages made. Defendant, FORD MOTOR COMPANY has failed to honor the terms of the express warranty.

19. The subject 1999 Ford E-150 van, with Vehicle Identification Number (VIN) 1FDR14WXX1[REDACTED] was in substantially the same condition at the time of the fire, as when it left

the control of the defendants, FORD MOTOR COMPANY.

20. The subject Ford truck as designed, manufactured and distributed was defective and unreasonably dangerous when put to a reasonably anticipated use.

21. The aforesaid incident was the direct and proximate result of the failure of an original component part covered under the terms of the express warranty.

22. As a direct and proximate result of the breach of the express warranty by Defendant, FORD MOTOR COMPANY, the plaintiffs suffered damages.

23. Plaintiff, [REDACTED], paid to or on behalf of its insureds/subrogor [REDACTED] in excess of the sum of \$23,000.00, under the terms of the policy of insurance issued to them, and thereby became subrogated to their rights thereunder. See Exhibit A.

WHEREFORE, Plaintiff, [REDACTED] COMPANY, demands judgment in its favor and against defendant, FORD MOTOR COMPANY, and for damages in an amount of Twenty Three Thousand Two Hundred Twenty Two and 83/100 (\$23,221.83), plus costs of suit and for any further relief which may be just and necessary.

Count II - Breach of Implied Warranties

1. - 23. Plaintiff [REDACTED], as Subrogee of [REDACTED] by their attorneys COSBY, OLTMAN & BELL, P.C., adopts and re-alleges paragraphs 1 - 23, inclusive, of Count I, as paragraphs 1 - 23, inclusive, of this Count II, against Defendant, FORD MOTOR COMPANY.

24. By virtue of Sections 2-314 and 2-315 of the Uniform Commercial Code (810 ILCS 5/2-314 and 315), Defendant, FORD MOTOR COMPANY, impliedly warranted that the installation of the positive battery cable and associated wiring and all brackets was done in a workmanlike manner and that the vehicle as completed was merchantable and fit for the particular purpose for which it

was being used at the time of the fire; and in reliance upon the implied warranties, the subject vehicle was used in the normal manner intended.

25. Notwithstanding the implied warranties, the positive battery cable and the vehicle were not reasonably safe and defendant(s) failed to give sufficient and proper warnings to purchasers and/or users of the vehicle.

26. As a direct and proximate result of the breach of implied warranties by Defendant, FORD MOTOR COMPANY, the plaintiffs suffered damages.

27. Plaintiff, [REDACTED], paid to or on behalf of its insureds/subrogers [REDACTED] the sum of \$23,221.83 under the terms of the policy of insurance issued to them, and thereby became subrogated to their rights thereunder.

WHEREFORE, Plaintiff [REDACTED] COMPANY, as Subrogee of [REDACTED] demands judgment in its favor and against defendant, FORD MOTOR COMPANY, and for damages in an amount of Twenty Three Thousand Two Hundred Twenty One and 83/100 (\$23,221.83), plus costs of suit and for any further relief which may be just and necessary.

By: Gregory Oltman  
GREGORY OLTMAN  
One of it's attorneys

Attorney I.D. 32137  
COSBY, OLTMAN & BELL, P.C.  
77 West Washington St. Ste 1605  
Chicago, IL 60602  
(312) 263-7180

# State Farm Insurance Companies

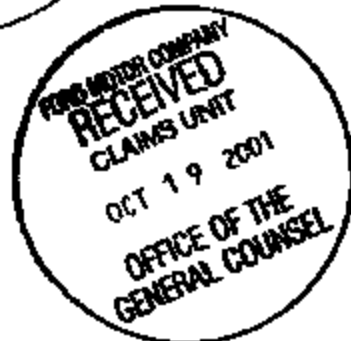


October 16, 2001

Claim Office  
185 North Randall Road - Suite S  
Batavia, Illinois 60510-9470  
Phone: (630) 406-5000  
FAX: (630) 406-5036

FORD MOTOR COMPANY  
Parklane Towers West  
Suite 400 3 Parklane Blvd  
Dearborn, MI 48126 2568  
CERTIFIED MAIL- RETURN RECEIPT REQUESTED

Our Claim Number: [REDACTED]  
Our Insured: [REDACTED]  
Date of Loss: 4/25/01  
Amount of Loss: \$23,221.83  
Vehicle: 1999 Ford E150 Van  
VIN: 1FDRE14WXXB [REDACTED]  
Mileage: 24,226



Dear Sir/Ms:

Enclosed find our supporting subrogation material. The vehicle is available for inspection by appointment only. Since the vehicle is available for you to inspect and conduct your own investigation we have not included our expert report.

We will consider an exchange of expert reports once you have concluded your investigation.

Sincerely,

Barbara Edens  
Claim Specialist/ V.L.P. Subrogation  
(630) 406-5052

*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.*

-no expt.  
-color. photos  
-NO VPR  
-24,226 @





id



vehicle a total loss



rt view



engine area damaged from fire  
could be a alt plug area to



interio damaged from fire



lt ft dr per has  
minor fire damage



dash damaged from fire



Photo for: 13-7314-656



rt view



dash turned more on rt side  
lt side door relays are in

ENCLOSURE-10-7527

**LIFE OF THE ACADEMY**

DATE/TIME 10/10/10 10:10		DAY WEDNESDAY		MONTH/YEAR 10/10	
TYPE OF SITUATION FOUND Structure Fire <input type="checkbox"/> 11 Outside of Structure Fire <input type="checkbox"/> 12 Vehicle Fire <input checked="" type="checkbox"/> 13		TYPE OF ACTION TAKEN Extinguishment <input checked="" type="checkbox"/> 1 Investigation Only <input type="checkbox"/> 3		OCT - 5 2010	
FIXED PROPERTY USE Not Applicable <input type="checkbox"/> 008 1-Family Dwelling-Year <input checked="" type="checkbox"/> 411 2-Family Dwelling-Year <input type="checkbox"/> 414 3-5 Unit Apt/Tenant/Flat <input type="checkbox"/> 422 7-20 Unit Apt/Tenant/Flat <input type="checkbox"/> 423 + 20 Unit Apt/Tenant/Flat <input type="checkbox"/> 424 Resident/Working Garage <input type="checkbox"/> 881 Vacant Property <input type="checkbox"/> 915 Open Land/Field <input type="checkbox"/> 931		IGNITION FACTOR Incendary-No Cnl Disb <input type="checkbox"/> 11 Suspicious-No Cnl Disb <input type="checkbox"/> 21 Abandoned Material <input type="checkbox"/> 31 Indirect Contact/Opn Flame <input type="checkbox"/> 34 Child Playing <input type="checkbox"/> 36 Combust/Too Close Heat <input type="checkbox"/> 46 Part Failure/Leak/Break <input type="checkbox"/> 51		SUBROGATION Short Circ/Grnd Fault <input type="checkbox"/> 54 Other Elec Failure <input type="checkbox"/> 55 Lack of Maintenance <input type="checkbox"/> 56 Backfire <input type="checkbox"/> 57 Unattended Operation <input type="checkbox"/> 73 UNDETERMINED <input checked="" type="checkbox"/> 00	
OCCUPANT LAST NAME [REDACTED]		FIRST NAME [REDACTED]		PHONE [REDACTED]	
OCCUPANT LAST NAME [REDACTED]		OWNER ADDRESS, CITY [REDACTED]		TELEPHONE [REDACTED]	
METHOD OF ALARM FROM PUBLIC Telephone Direct <input checked="" type="checkbox"/> 1 Private Fire Alarm <input type="checkbox"/> 3 Radio <input type="checkbox"/> 4		DIRECT VERBAL REPORT <input type="checkbox"/> 5 Telephone Tie-Line <input type="checkbox"/> 7		[REDACTED]	
NO. FIRE SERVICE RESPONSE 10/10/10		NO. ENGINES RESPONDED 10/10/10		NO. ALARM APPARATUS RESPONDED 10/10/10	
NUMBER INCIDENT-RELATED INJURIES [REDACTED]		NUMBER INCIDENT-RELATED FATALITIES [REDACTED]		[REDACTED]	
COMPLEX Dwelling <input checked="" type="checkbox"/> 41 Apartment <input type="checkbox"/> 42 Shopping <input type="checkbox"/> 58 Farm <input type="checkbox"/> 65 Campsite <input type="checkbox"/> 93		MOBILE PROPERTY TYPE (If any, do line 3) Not Applicable <input type="checkbox"/> 08 Automobile <input checked="" type="checkbox"/> 11 Mobile Home <input type="checkbox"/> 17		Truck-Car Under 1 Ton <input type="checkbox"/> 22	
AREA OF ORIGIN Lounge Area <input type="checkbox"/> 14 Sleep Rm Under 3 People <input type="checkbox"/> 21 Kitchen/Cooking Area <input type="checkbox"/> 24 Trash Area/Container <input type="checkbox"/> 46 Garage/Carport/Storage <input type="checkbox"/> 47		EQUIPMENT INVOLVED IN IGNITION (If any, do line 1) Flud, Stair Lock Htg Unit <input type="checkbox"/> 13 Portable Local Htg Unit <input type="checkbox"/> 15 Chimney, Gas Vent Flu <input type="checkbox"/> 16 Fuel/Stagnant Surf Unit <input type="checkbox"/> 21 Open Fire Grill <input type="checkbox"/> 26		Cool, Plug <input type="checkbox"/> 47 Vehicle <input checked="" type="checkbox"/> 96 No Equipment Involved <input type="checkbox"/> 98	
FORM OF HEAT OF IGNITION Spark/Gas Fueled Exp <input type="checkbox"/> 11 Heat/Gas Fueled Exp <input type="checkbox"/> 12 Spark/Liq Fueled Exp <input type="checkbox"/> 13 Heat/Liq Fueled Exp <input type="checkbox"/> 14 Short Circuit-Bad Insul <input type="checkbox"/> 23 Short Circuit-Unspec <input type="checkbox"/> 24 Overloaded Exp <input type="checkbox"/> 27 Cigarette <input type="checkbox"/> 31 Match <input type="checkbox"/> 45		TYPE OF MATERIAL IGNITED Gasoline <input type="checkbox"/> 23 Fat/Grease (Food) <input type="checkbox"/> 31 Plastic—Unclassified <input type="checkbox"/> 40 Rubber <input type="checkbox"/> 51 Grass/Leaves <input type="checkbox"/> 54 Sawm Wood <input type="checkbox"/> 63 Untreated Paper <input type="checkbox"/> 67 Man-Made Fiber <input type="checkbox"/> 71 Cotton/Rayon <input type="checkbox"/> 72 Multiple Types <input type="checkbox"/> 97		FORM OF MATERIAL IGNITED Structural Member <input type="checkbox"/> 17 Upholstered Sofa/Chair <input type="checkbox"/> 21 Electrical Wire <input type="checkbox"/> 61 Fuel <input type="checkbox"/> 65 Growing/Unveg Form <input type="checkbox"/> 74 Rubbish/Trash <input type="checkbox"/> 75 Cooking Material <input type="checkbox"/> 76 Gas/Liquid from Pipe <input type="checkbox"/> 86 Multiple Form <input type="checkbox"/> 97	
[REDACTED]		[REDACTED]		[REDACTED]	

**COMPLETE ON ALL INCIDENTS**

**COMPLETE ON ALL FIRE INCIDENTS:**

- If submitting from Jan 2011 through May 2011, please enter in Membership and indicate one report in the survey field as shown

\* In other countries, Canada, Mexico

**CONTINUED ON REVERSE SIDE**

M Address of building: <u>1111 1st St</u> City: <u>San Francisco</u> State: <u>CA</u> Zip: <u>94102</u>	Name of building: <u>1111 1st St</u> City: <u>San Francisco</u> State: <u>CA</u> Zip: <u>94102</u>	Name of building: <u>1111 1st St</u> City: <u>San Francisco</u> State: <u>CA</u> Zip: <u>94102</u>	Name of building: <u>1111 1st St</u> City: <u>San Francisco</u> State: <u>CA</u> Zip: <u>94102</u>
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# COMPLETE LINES N—R FOR STRUCTURE DATA ONLY

N NUMBER OF STORIES 1 Story <input type="checkbox"/> 1 2 Stories <input type="checkbox"/> 2 3 to 4 Stories <input type="checkbox"/> 3 5 to 6 Stories <input type="checkbox"/> 4 7 to 12 Stories <input type="checkbox"/> 5 13 to 24 Stories <input type="checkbox"/> 6	CONSTRUCTION TYPE Fire Resisive <input type="checkbox"/> 1 Unprotected Ordinary <input type="checkbox"/> 6 Protected Wood Frame <input type="checkbox"/> 7 Unprotected Wood Frame <input type="checkbox"/> 8
O EXTENT OF FLAME DAMAGE Object <input type="checkbox"/> 1 Part Room <input type="checkbox"/> 2 Room <input type="checkbox"/> 3 Building <input type="checkbox"/> 6	EXTENT OF SMOKE DAMAGE Object <input type="checkbox"/> 1 Part Room <input type="checkbox"/> 2 Room <input type="checkbox"/> 3 Building <input type="checkbox"/> 6
P DETECTOR PERFORMANCE No Detectors Present <input type="checkbox"/> 8	SPRINKLER PERFORMANCE No Equip Present <input type="checkbox"/> 8
Q IF SMOKE SPREAD BEYOND ROOM OF ORIGIN: TYPE OF MATERIAL GENERATING MOST SMOKE: Gasoline <input type="checkbox"/> 23 Fat/Grease (Food) <input type="checkbox"/> 31 Plastic/Unclassified <input type="checkbox"/> 40 Rubber <input type="checkbox"/> 51 Grass/Leaves <input type="checkbox"/> 54 Sawd Wood <input type="checkbox"/> 63 Untreated Paper <input type="checkbox"/> 67 Man-Made Fiber <input type="checkbox"/> 71 Cotton/Rayon <input type="checkbox"/> 72 Multiple Types <input type="checkbox"/> 97	
R FORM OF MATERIAL GENERATING MOST SMOKE: Structural Member <input type="checkbox"/> 17 Upholstered Sofa/Chair <input type="checkbox"/> 21 Electrical Wire <input type="checkbox"/> 61 Fuel <input type="checkbox"/> 65 Growing/Living Form <input type="checkbox"/> 74 Robbery/Trash <input type="checkbox"/> 75 Cooking Material <input type="checkbox"/> 76 Gas/Liquid From Pipe <input type="checkbox"/> 86 Multiple Form <input type="checkbox"/> 97	
S IF NOISE PROPERTY YAM YEAR 99	NAME FORD MODEL E-150 CONVERSION SERIAL NO. 1FDRM1HXHB13365 LICENSE NO. 14/18330 329
T IF EQUIPMENT INVOLVED IN IGNITION YEAR MAKE	MODEL SERIAL NO.
U OFFICER IN CHARGE (Name, position, assigned) G. MILLETTE / PTAL	WEATHER FAIR TEMPERATURE 45° WIND DIRECTION AND VELOCITY CALM

## OPTIONAL COMMENT AREA:

The call had been received and dispatched as a van fire at [REDACTED] E-963 responded from fire station #3 and upon their arrival, discovered a conversion van with a fire in the engine compartment with some extension to the interior. They charged a preconnected 1-3/4" handline and extinguished the fire. The crew determined that the fire originated in the engine compartment but could not find a cause.

ESTIMATIONS AND EVALUATIONS MADE HEREIN REPRESENT "MOST LIKELY" AND "MOST PROBABLE" CAUSE AND EFFECT.

CAV FIRE / ASSIST F.D.	4-2501	202 Julia	01M1	123	306	9004	09
COMPLAINANT	ADDRESS		PHONE				

CAV '99 Ford Conversion VAN R730729 1FDRE14WXXH

OWNER [REDACTED] M/W 10-4-55 [REDACTED]

At the above date + time I used the  
 FIRE EXTINGUISHER from Squad #142 to try to  
 put out the fire in the above van. The fire  
 Extinguisher was placed in the W.C.'s office  
 to be serviced. J.M.

RECEIVED  
 MAY 23 2001  
 WESTMONT



# INVESTIGATIONS Customer Report

REPORT NUMBER 2020002

ADDRESS 2237 G 10

ST C

REPORT TYPE 01

INVESTIGATOR

SECTION NUMBER 10

ACCORD NUMBER 1

**SUMMARY** ACCIDENTAL FIRE OCCURRED IN LARGE COMMERCIAL BLDG. USED TO SERVICE VEHICLES. FIRE WAS A VEHICLE FIRE WHICH STARTED IN ENGINE AREA OF AN AIRBORNE EXPRESS VAN. VAN WAS A TOTAL LOSS. SMOKE AND WATER DAMAGE TO STRUCTURE CONTENTS. SPRINKLERS CONTAINED FIRE.

PROPERTY CODE	573	CONSTRUCT TYPE	5		
STORIES AB	1	BLDG STATUS	2		
STORIES BE	0				
VEHICLE TYPE	20	VEHICLE COLOR	21	VEHICLE COLOR	
VEHICLE YR		VEHICLE MAKE	FORD	VEHICLE MODEL	VAN
VEHICLE REG STATE		VEHICLE REG		VEHICLE REG	
VEHICLE VIN					
PROPERTY LOSS	\$15,000.00	CONTENT LOSS	\$35,000.00	STRUCTURAL LOSS	\$0.00
PROPERTY VALUE	\$800,000.00	CONTENT VALUE	\$100,000.00	STRUCTURAL VALUE	\$0.00
				TOTAL LOSS:	\$40,000.00
AREA OF DAMAGE	83	RENT INFORMATION	20	FIRE DAMAGE CODE	3
LEVEL OF DAMAGE		RENTAL FACTOR	65	STRUCTURAL DAMAGE CODE	6
EQUIPMENT CODE		EQUIPMENT NUMBER		EXTERIOR DAMAGE CODE	4
EQUIPMENT YR		EQUIPMENT MODEL			
CRACKED SLAB	0	IF SLAB	0	FRONT TIER	
CRACKED FLOOR	0	IF FLOOR	0	FRONT TIER	F0022
REPORT DATE	02/10/02	REPORT TIME	200	INVESTIGATOR UNIT	C806 8
INVESTIGATOR NAME	J THOMAS				



231830 \*AOR (\*\*\*\*\* E6  
 231942 \*VIC (\*\*\*\*\* U1 , FILLED AIR  
 232337 \*AOR (\*\*\*\*\* U1  
 233449 MISC (TJ5332) E16 (KCM)  
 , UNITS GO AVALI AS THEY ASSEMBLE  
 23 07 \*AOR (\*\*\*\*\* L22  
 23 22 \*AOR (\*\*\*\*\* E16  
 235801 AIQ (RJ4067) L11  
 \*\* New Date: 02/10/02 \*\*  
 000010 MISC (TJ5332) , 02/09/02 23:59:56 Message To: #682 TRO From: D  
 83  
 000010 MISC (TJ5332) , PER ADT, THERE IS NO RP TO RESPOND. THEY ARE UN  
 ABLE TO CONTACT ANYONE  
 002505 MISC (TJ5332) , 02/10/02 00:24:27 Message To: #8682 TRO From:  
 D85  
 002505 MISC (TJ5332) , JIN WITH SUN DEVIL FIRE HAVE C505 CALL 623 87816  
 00  
 002626 CHANGE (FR0107) LOC: 2237 S 17TH ST, PRX --> 2237 S 16TH ST, PRX  
 002626 UPDATE (FR0107)  
 002628 CHANGE (FR0107) Alert: ???->  
 002639 UPDATE (FR0107)  
 002650 CHANGE (FR0107) TX1: SMO PARTS --> FMS FLEET MANAGEMENT SVCS, IN  
 C  
 003016 MISC (FR0107) C505 , BROKEN GLASS WINDOW FRAME BY THE OFFICE, INV IS C  
 ONCERNED THAT SOMEONE COULD ENTER THRU IT, DOOR T  
 HAT WAS FORCED HAS BEEN LOCKED AGAIN DOOR BY SBY  
 DOOR THAT WAS FORCED OPEN WAS LOCKED AGAIN  
 003543 MISC (TJ5332) , 02/10/02 00:35:29 Message To: #8682 TRO From:  
 D85  
 003543 MISC (TJ5332) , PER JIN AT SUN DEVIL, HAS NO RP INFO  
 004237 MISC (TJ5332) C505 , STILL ON..WAS IN COMMUNICATION REGARDING RP  
 004811 AOR (TJ5332) C505 , WORKER FOR PROPERTY ARRIVED, TURNING SCENE OVER  
 TO HIM  
 005816 CLEAR (TJ5332) APS00  
 005816 CLEAR (TJ5332) SWG01  
 005816 CLOSE (TJ5332)

222059 SECURE (FM2241) R22  
 222112 WISC (FM2241) SOUTH  
 222127 \*AOR (\*\*\*\*\* CV1  
 222143 ENROUTE (TJ5332) C505 (61:17)  
 2 48 AIQ (TJ5332) C504  
 21 48 AIQ (TJ5332) C515  
 222209 RECALL (FM2241) BC5  
 222209 RECALL (FM2241) SDC  
 222209 RECALL (FM2241) E11  
 222209 RECALL (FM2241) E13  
 222209 RECALL (FM2241) AR18  
 222209 RECALL (FM2241) DSO  
 222209 RECALL (FM2241) E5  
 222209 RECALL (FM2241) HDC  
 222209 RECALL (FM2241) C56  
 222209 RECALL (FM2241) AP800  
 222209 RECALL (FM2241) SWG01  
 222209 RECALL (FM2241) CV1A  
 222211 AOR (HT5075) SDC  
 222240 \*AOR (\*\*\*\*\* AR18  
 222257 AOR (FM2241) E13  
 222400 \*AOR (\*\*\*\*\* HDC  
 222532 \*AOR (\*\*\*\*\* E8  
 222623 \*AOR (\*\*\*\*\* E11  
 223057 \*AOR (\*\*\*\*\* E5  
 223205 WISC (FM2241) ,SPRINKLERS OFF AT THIS TIME..  
 223420 WISC (FM2241) ,HAVE THE BLDG VENT.. SPRINK E16 L22 L11 E6 U1 C5  
 05  
 223436 RECALL (FM2241) E8  
 223436 RECALL (FM2241) DSO  
 223436 RECALL (FM2241) C957  
 223436 RECALL (FM2241) C56  
 2 36 RECALL (FM2241) E12  
 223436 RECALL (FM2241) AP800  
 223436 RECALL (FM2241) SWG01  
 223436 RECALL (FM2241) CV1A  
 223440 WISC (FM2241) ,ARE DRAINING THE SPRINKLER SYSTEM NOW  
 223459 AIQ (FM2241) CV1A  
 223812 ONSCHE (FM2241) C505 [17:46]  
 224205 WISC (FM2241) ,DOING A CRITIQUE.. HAVE L11 COME OVER  
 224241 \*AOR (\*\*\*\*\* E8  
 224417 AOR (FM2241) DSO  
 224450 \*AOR (\*\*\*\*\* C56  
 225256 \*AIQ (\*\*\*\*\* E22  
 225439 RECALL (TJ5332) BC5  
 225439 RECALL (TJ5332) C957  
 225439 RECALL (TJ5332) L11  
 225439 RECALL (TJ5332) AP800  
 225439 RECALL (TJ5332) SWG01  
 225439 RECALL (TJ5332) C505  
 225544 CHDONS (TJ5332) E16  
 225615 RECALL (TJ5332) BC5  
 225615 RECALL (TJ5332) C957  
 225615 RECALL (TJ5332) AP800  
 225615 RECALL (TJ5332) SWG01  
 225615 RECALL (TJ5332) C505  
 225705 WISC (TJ5332) L11 ,DO YOU WANT A 24 FT FOR THE SPRINKLER HEAD?...WE  
 ED 38  
 225827 \*FIC (\*\*\*\*\* E8 ,57 YOM MULTI BEAM QD Q2 MONITOR CM GS PT TX TO G  
 E VIA RS ALS  
 2 139 AOI (TJ5332) C957  
 230044 \*AOR (\*\*\*\*\* BC5

220806 MISC (PM2241) ,PER ALL CALL DONE AT 1A DISP  
220807 \*UPDATE (\*\*\*\*\*): 2210  
220814 ASSGER (PM2241) E22 (ALS/MPH/ENG/CAN)  
#HW0489 HAYES, WILLIAM B  
#BR1491 BECKER, BRUCE L  
#AN0897 ALBO, MARCO A  
#GG5085 GENTRY, GREG  
#TC2913 TERRACCIANO, CHARLES  
220816 ONSCNE (PM2241) E22 [08:02]  
220826 MISC (PM2241) ,E22 STANDBY FOR E16..  
220941 MISC (PM2241) ,E6 STAND DOWN ON THE LINE.. NO PHYSICAL ACCESS T  
O THE BUILDING..  
221012 MISC (PM2241) ,PER SAFETY SMS OF AZ.. NOTHING ON ANY OTHER SIDE  
OF THE BUILD  
221047 MISC (PM2241) ,VAN ON INTERIOR OF THE LARGE COMM BUILDING INVOL  
VED.. FIRE UNDER CONTROL PAR ON ALL UNITS.. STIL  
L HAVE HEAVY SMOKE INV SALV OP AT THIS TIME  
221114 ASSGER (PJ1735) APH00(BLDG C)  
221119 MISC (PM2241) ,WANT ALL UNITS TO CONTINUE IN UNTIL THEY GET VEN  
TILATION AND AN ALL CLEAR AGAIN  
221130 MISC (PM2241) (UC )  
221130 TINSER (\*\*\*\*\*)  
221154 ONSCNE (PM2241) E11 [08:52]  
221215 ASSGER (PJ1735) BNG01(BLDG C)  
221235 MISC (PM2241) ,L22 WITH SOUTH SECTOR  
221238 \*ONSCNE (\*\*\*\*\*): C957 [07:33]  
221240 ASSGER (PJ1735) CV1A (MLS) (BLDG C)  
#IM0681 IVOR, MICHAEL B  
221241 MISC (PM2241) ,L22 TO COME OUT TO START VENT  
221319 \*EMBOUT (\*\*\*\*\*): CV1 CODE 2  
221326 MISC (PM2241) ,PER SOUTH SECTOR.. NO OTHER INVOLVEMENT.. NO EXT  
.. CANT SEE THE CEILING BECAUSE ITS TOO SMOKE  
221428 \*ONSCNE (\*\*\*\*\*): U1 [11:26]  
2 29 ONSCNE (PM2241) CV1 [09:24]  
221439 ONSCNE (PM2241) E5 [09:34]  
221504 \*STAGED (\*\*\*\*\*): L11 [09:59]  
221514 CROSS (PM2241) #F02028689  
221527 CROSS (PM2241) #F02028689  
221529 \*STAGED (\*\*\*\*\*): CV1  
221552 SECTOR (PM2241) L11 VENT  
221642 \*ONSCNE (\*\*\*\*\*): L11  
221709 SECMEM (PM2241) R6 SOUTH  
221803 SECTOR (PM2241) SDC SAFETY  
221808 \*ONSCNE (\*\*\*\*\*): BC2 [13:03]  
221815 SECMEM (PM2241) E8 SOUTH  
221832 SECMEM (PM2241) L22 VENT  
221908 \*AOR (\*\*\*\*\*): BC2  
221909 ONSCNE (PM2241) CV1A [01:20]  
(22:19:40)  
221957 SPECI (PM2241) INV  
222005 SUGG (AVLNUQ) D82 Response requirements can't be filled  
222025 ADDREQ (HT5075) C504 C505 C515  
222025 SUGG (AVLNUQ) D82 C504[??.] C505[??.] C515[??.]  
222026 ASSG (HT5075) C504 (MLS)  
#CB0467 CAVIGLIA, BERNARD L  
222026 ASSG (HT5075) C505 (MLS)  
#TJ0417 THOMAS, JAMES M  
222026 ASSG (HT5075) C515 (MLS)  
#HQ1547 HERNANDEZ, GARY D  
222026 SUPDATE (SYSTEM) Paged: C504 C505 C515 ATFFI  
2' 31 VOICED (HT5075)  
2' 32 MISC (PM2241) ,FIRE CONTAINED TO THE VAN NO EXT  
222035 \*ONSCNE (\*\*\*\*\*): C6E [13:58]

220505	ASSG	(HT5075)	L11	#WJ0523 WALTER, JAMES J [02.7] (NLS/LLT/MFM/EXT/LAD) #BJ0584 BRUNACINI, JOHN W #JK0690 JOHNSTON, KEN W #IR0680 IMHOFF, RODNEY W #FF1036 FERNER, FLOYD W #BH1802 HARMAN, DEAN E
220505	ASSG	(HT5075)	LT11	[02.7] (NLS/MFM/EXT/LAD) #BJ0584 BRUNACINI, JOHN W #JK0690 JOHNSTON, KEN W #IR0680 IMHOFF, RODNEY W #FF1036 FERNER, FLOYD W #BH1802 HARMAN, DEAN E
220505	ASSG	(HT5075)	B5	[02.9] (NLS/ENG/MFM/CAM/CAF) #IJ0682 IZZO, JOHN D #ED1324 REILING, DANIEL C #WD1421 WAITMAN, DENNIS J #BJ0584 BRUNACINI, JOHN W
220505	ASSG	(HT5075)	CV1	[03.0] (NLS/XPV) #RG0779 RYIMAR, GREGORY D
220505	ASSG	(HT5075)	C56	[05.3] (NLS) #DJ0306 DUCOTE, JOSEPH
220505	ASSG	(HT5075)	BC2	[06.0] (NLS/CMD/PEX/BAF/XPC) #TR0028 TAYLOR, ROBERT E #CA0968 CARYTO, ANTHONY E
220505	ASSG	(HT5075)	EDC	[18.5] (NLS/CMD/PEX/BAF/BAF/XPC) #WL1643 WEALEY, LAMAR L #NJ0022 MALDONADO, JOHN A
220505	\$DWARF	(SYSTEM)		Dispatch warning, assignment code STEPH and incident status NF !- ACTIVATE PHOENIX ALL CALL
220505	\$CHANGE	(HT5075)		TYD: STR --> STR1A RSP: 3-1RIC --> STR1A
2	05	\$UPDATE	(SYSTEM)	Page0: D80 C56 ALLIA ALLWI C36A C56B C56C C56D C53 C614C C54D C54A C621 C522 C614B C 861 C52D C513 C11 C579 C957A C957B C957C C9 4A C773 C778 C779 C678 BC2AP BC2A BC2CF B90 BC2BF B7B NDCC NDCC NDCA NDCCF NDCAV NDCCB B
220541	VOICED	(HT5075)		
220543	VOICED	(HT5075)		
220543	VOICED	(HT5075)		
220551	*ENROUT	(*****)	EDC	[00.46] CODE 3
220556	WISC	(PM2241)		, NORTH ACCT NEED TO FIND A WATER SOURCE
220559	*ENROUT	(*****)	CV1	[00.54] CODE 3
220610	*ENROUT	(*****)	L11	[01.05]
220611	*CLEAR	(*****)	LT11	
220614	*ENROUT	(*****)	B5	[01.89] CODE 3
220615	*AOR	(*****)	C56	
220624	*AOR	(*****)	L11	
220637	*ASSG	(*****)	C56	(NLS) #DJ0306 DUCOTE, JOSEPH
220648	*ENROUT	(*****)	C957	[01.43] CODE 3
220718	*ENROUT	(*****)	BC2	[02.18] CODE 3
220719	*ENROUT	(*****)	AR18	[04.17] CODE 3
220739	WISC	(PM2241)		, PER SOUTH SECTOR.. VAN ON FIRE ON THE INTERIOR.. APPEARS NO EXTENSION.. FIRE IS OUT AT THIS TIME DO HEED SOME VENTILATION NEED LIGHTS ALSO (BAR) ON INTERIOR
220745	WISC	(PM2241)		
220756	WISC	(PM2241)		
220806	WISC	(PM2241)		
220806	WISC	(PM2241)		

220806 WISC (PM2241) D80 [03:01]  
.02/09/02 22:06:19 Message To: 6682 TRO From: D

215738 STAGED (PM2241) R8 , EAST ON PLUG  
[05:20]  
SOUTH  
215743 ASSGN (PM2241) R8 [ALS/AMB/REF/BLT)  
#MM4079 HARRLESON, MICHAEL  
#MM2969 MARTIN, PETER M  
[00:05]  
215750 STAGED (PM2241) R8 , SOUTH  
215831 \*ONSCNE (\*\*\*\*\* L22 [06:13]  
215844 \*ONSCNE (\*\*\*\*\* BC5 [06:26]  
215912 MISC (PM2241) , SMS OF AZ DB LITE SMOKE IN THE BLDG CMD  
220013 CHANGE (PM2241) LOC: S 17TH ST/E WATKINS ST , PHX --> 2217 S 17TH  
ST. PHX .  
LOC1: --> BLDG C,  
SUBZONE: 20507 --> 16,  
TXT1: CAR BODY SHOP --> SMS PARTS  
  
320013 UPDATE (PM2241)  
220015 \$CHANGE (PM2241) Alert: 777-->  
220016 CHDONS (PM2241) E16  
220018 CHDONS (PM2241) BC5  
220106 MISC (PM2241) , WILL HAVE TO FORCE ENTRY.. HAVE SMOKE IN THE BUI  
LDING.. NEED ASSISTANCE WITH THE ROLL UP DOORS  
220116 MISC (PM2241) , E16 HAS R8 WITH THEM  
220120 SECTOR (PM2241) E16 SOUTH  
220129 MISC (PM2241) , L22 AND R8 WITH THEM  
220148 \*ONSCNE (\*\*\*\*\* BDC [09:30]  
220246 STAT (PM2241) (WF ) -- WORKING FIRE  
220246 UPDATE (PM2241) Pagers updated: C623 C56A C56B C56C C56D C53  
C614C C54D C54A C621 C522 C614R C661 C52D  
C515 C11 C56 BC5B BC5B7 SBO C50 BC5A  
BC5CP BC5C C50 C5D SDCR SDCR SDCR SDCR  
SDCAF SDCCF  
WORKING FIRE  
2 54 BALNCE (PM2241) 3-1RIC  
220300 SUGG (AYLSUG) D82 E11+ [02.7] U1 [03.0] RH3 [04.0] AR18 [11.2]  
220302 ASSG (HT5075) E11 [02.7] (ALS/ENG/REF/CAF)  
#BS0923 BANGE, STANLEY W JR  
#BS0674 HILL, STEVEN L  
#MD1578 MACBETH, DOUGLAS T  
#BJ2612 BEDARD, JASON  
220302 ASSG (HT5075) U1 [03.0] (WLS/PDT/XPU)  
#CA0608 CUSIMANO, ANTHONY L  
220302 ASSG (HT5075) RH3 [04.0] (WLS)  
220302 ASSG (HT5075) AR18 [11.2] (WLS/CCU)  
#RM5343 ROMERO, MELANIE  
#LJ3407 LITTLE, JOSEPH C  
220302 \$CHANGE (HT5075) RSP: 3-1VEX --> 3-1RIC  
220302 \$UPDATE (SYSTEM) Paged: AR18 C904B C56A C56B C56C C56D C53  
C614C C54D C54A C621 C522 C614R C661 C52D C  
515 C11 C56 C56B C569 C562 C565 C809 AR  
1 C814 C813C  
  
220326 RECALL (HT5075) AR18  
220345 VOICED (HT5075)  
220356 \*ENFOUT (\*\*\*\*\* E11 [00:54] CODE 3  
220406 MISC (PM2241) , HAVE HEAVY SMOKE.. WITH SPRINKLERS GOING OFF  
220406 ENFOUT (HT5075) U1 [01:04]  
220423 \*ASSGN (\*\*\*\*\* E11 (ALS/AMB/REF/BLT)  
#KR3084 KIRK, RUSSELL A  
#PD4086 PHELPS, DAVID  
220444 BALNCE (PM2241) STRIA  
2 48 SUGG (AYLSUG) D82 DRG [77.7] C987 [02.0] L11 [02.7] LT11 [02.7] R3 [02.9  
] CV1 [03.0] C86 [05.3] EC2 [06.0] WDC [18.5]  
220505 ASSG (HT5075) D80 (WLS)

4/14/06 2114:06 2114:06 2114:06  
 incident history for: #02028582 02/10/02 19:20:16

LOSD closed PREM:  
 3 3-IRIC STRIA STRUCTURE FIRE CODE 3 SR0282-16 5 020902 #028682  
 CC 2237 S 16TH ST, PHX(NV) BLDG C 0022523548

R. 401 E 17TH PL, PHX 0022523548

MS FLEET MANAGEMENT SVCS, INC

CV:02/09/02 215050 ENT:02/09/02 215201 DSP:02/09/02 215218 REP:02/09/02 215240  
 WB:02/09/02 215725 EFG:02/09/02 215725 LAD:02/09/02 215831 AMB:02/09/02 215748  
 LB:02/09/02 215732 PAR:02/09/02 220756 UC :02/09/02 221130 PAR:02/09/02 222053  
 CM:02/09/02 233449

215301 ENTRY (WJ5170) DS12

215201 \$CHANGE (WJ5170)

215210 SUGG (AVLSUG) DS2

215215 DISP (HT5075) E16

215218 ASSG (HT5075) E6

215218 ASSG (HT5075) R8

215218 ASSG (HT5075) E8

215218 ASSG (HT5075) BC5

215218 ASSG (HT5075) L22

215218 ASSG (HT5075) SDC

215218 \$UPDATE (SYSTEM)

215240 \*ENROUT (\*\*\*\*\* ) E6

215241 VOICED (HT5075)

215250 \*ENROUT (\*\*\*\*\* ) E8

215252 PTI (WJ5170)

215253 \*ENROUT (\*\*\*\*\* ) E16

215255 \*ENROUT (\*\*\*\*\* ) L22

215302 \*ENROUT (\*\*\*\*\* ) SDC

215303 \*ENROUT (\*\*\*\*\* ) R8

215307 \*ENROUT (\*\*\*\*\* ) BC5

725 \*AIQ (\*\*\*\*\* ) R8

725 OBSCHG (PM2241) E16

Alert: ???->

E16[00.8] E6+[02.1] R8[02.7] E8+[02.7] BC5[03.1]  
 L22[03.1] SDC[03.7]

[00.8] (HLS/ENG/NPW)

#EL0339 HENDON, LEONARD B

#XD0698 KITCHENS, DWAYNE J

#NJ2648 MARTIN, JAMES P

#JT1824 JOHANNESSEN, THOMAS

[02.1] (ALS/ENG/NPW/CAF)

#HA0491 HOFFMAN, ALFRED

#FC0628 FUDULOFF, CHRIS A

#JJ1142 JONOVICH, JOHN

#GJ1385 STILLMAN, JUSTIN B

[02.7] (HLS/AMB/RFR/BLT)

#HM4079 HARKELSON, MICHAEL

#MF2969 MARTIN, PETER M

[02.7] (ALS/ENG/NPW/TET/TEC)

#VB1840 VELASCO, GEORGE F

#GJ1382 STEINBECK, JEFFREY A

#MJ1545 RUCK, JON F

#SR2811 STALDER, RUSTY

[03.1] (HLS/CMD/PHX/RAF/XPC)

#HC1354 HOOD, CHARLES N

#CJ1300 CABB, JEFFREY A

[03.1] (HLS/LLT/NPW/EXT/LAD/RLV)

#PC0391 PACKERUSH, DENNIS L

#SB1391 SULLIVAN, BRIAN M

#DR2372 DOOLEY, RYAN

#VD0811 VELASQUEZ, DAVID J

[03.7] (HLS/CMD/PHX/RAF/RTF/XPC)

#MP0019 MORRIS, PETER J

#SP0431 SUNDER, PAUL J

Paged: BC5B BC5BF SSO CSO BC5A BC5CF BC5C

C48 CFD SDCA SDCB SDCD SDCF SDCG SDCV

[00:22] CODE 3

[00:32] CODE 3

AGE: SEX: INFE:

C:CALLER SAYS THAT TH ERE IS WHITE SMOKE COMING F  
 ROM T HE ROOF OF A BODY SHOP AT THAT LOCATION. CA  
 LLE R CAN SEE THE ROOF OF THE BLD FR OM HER HOUSE  
 ON 17TH PL

[00:35]

[00:37] CODE 3

[00:44] CODE 3

[00:45] CODE 3

[00:49] CODE 3

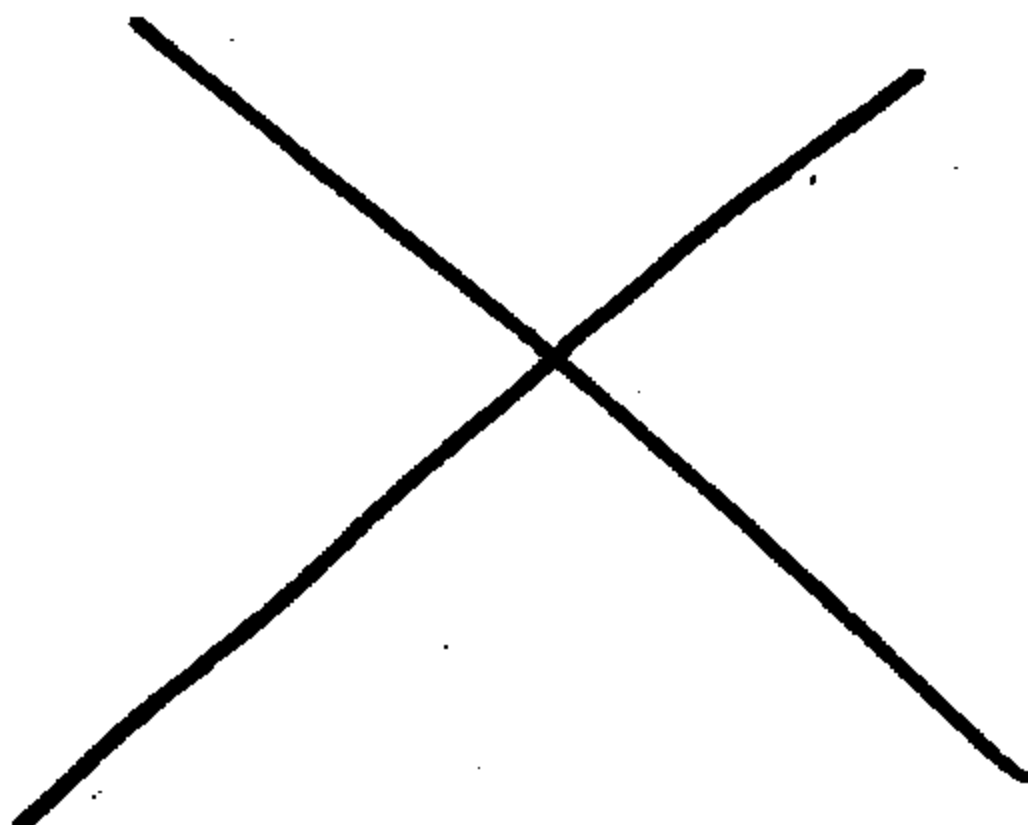
[05:57]

,19 AREA CYING

CITY OF PHOENIX, ARIZONA  
FIRE REPORT

FILE#	02-028882	02/26/02
[REDACTED]		

IN CONCLUSION, THIS FIRE IS RULED AS ACCIDENTAL. THE FIRE ORIGINATED IN THE ENGINE AREA OF A FORD AIRBORNE EXPRESS VAN THAT WAS INSIDE THE BUILDING. I DO NOT KNOW WHAT REASON THE VAN WAS IN THE BUILDING, WHAT REPAIRS IT NEEDED, OR WHAT REPAIRS WERE MADE. I CANNOT RULE OUT SOME FORM OF ELECTRICAL MALFUNCTION WHICH STARTED A FIRE IN THE AREA WHERE THE FUSE BOX WAS LOCATED. NO INJURIES WERE REPORTED AND THE FIRE SCENE WAS LEFT WITH MR. WORST, WHO WILL CONTACT AN R.P.



J. THOMAS	F0022	02/26/02	mm
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CITY OF PHOENIX, ARIZONA  
FIRE REPORT

FIRE	02-020882	02/09/02

I ENTERED THE BUILDING THROUGH THE OPEN ROLLUP DOOR NEXT TO THE METAL DOOR THAT ENGINE 16 FORCED OPEN. THE ROLLUP DOOR WAS OPENED MANUALLY BY CREWS INSIDE AFTER THEY MADE ENTRY. THE ROOM WHERE THE FIRE OCCURRED WAS A LARGE VEHICLE SERVICE AREA LOCATED IMMEDIATELY WEST OF THE OFFICE, THE OFFICE BEING LOCATED ON THE EAST END OF THIS BUILDING. TOWARD THE EAST END OF THIS ROOM WAS A FORD AIRBORNE EXPRESS VAN WITH HEAVY FIRE DAMAGE. THE INTERIOR AND ENGINE AREAS OF THE VAN WERE COMPLETELY BURNED. THE HEAVIEST BURNING WAS LOCATED ON THE FRONT DRIVER'S SIDE CORNER OF THE ENGINE WHERE A SECTION OF THE FIBERGLAS HOOD WAS BURNED AWAY AND THE DRIVER'S SIDE HALF OF THE RADIATOR MELTED DOWN. THERE WAS A LOT OF ELECTRICAL WIRING IN THIS AREA. THE BURNED REMAINS OF THE BATTERY WERE LOCATED ON THE OPPOSITE PASSENGER CORNER OF THE ENGINE. I CHECKED THE ENGINE OF ANOTHER FORD AIRBORNE EXPRESS VAN WHICH WAS NOT BURNED, AND FOUND A LARGE PLASTIC POWER DISTRIBUTION BOX, WHICH CONTAINED THE FUSES LOCATED ON THE DRIVER'S SIDE FRONT CORNER OF THE ENGINE. THIS WAS THE SAME LOCATION I FOUND THE HEAVIEST BURNING ON THE BURNED VAN.

IN A BAY LOCATED IMMEDIATELY EAST OF THE VAN WAS A CORVETTE, WHICH WAS ALSO DAMAGED BY HEAT, SMOKE, AND WATER. THE STRUCTURE ITSELF AROUND THE VAN HAD SOME HEAT DAMAGE. THERE WAS HEAVY SMOKE AND WATER DAMAGE TO THE ENTIRE ROOM AND SOME SMOKE AND WATER DAMAGE TO THE ADJOINING OFFICE.

AFTER MY FIRE SCENE EXAMINATION, I TRIED TO CONTACT THE RESPONSIBLE PARTY FOR THE BUILDING. I COULD NOT FIND ANY PHONE NUMBERS WRITTEN DOWN BUT THE BUILDING WAS MONITORED BY BOTH A SECURITY COMPANY AND A FIRE COMPANY. I CALLED BOTH COMPANIES AND THEY WERE UNABLE TO CONTACT A RESPONSIBLE PARTY. I FOUND A COMPUTER IN THE OFFICE WHERE FIRE CREWS OPENED AND ENTERED. I FOUND A LIST OF PHONE NUMBERS ON THE COMPUTER AND STARTED CALLING NUMBERS FROM THE TOP DOWN UNTIL I CONTACTED SOMEONE. A SERVICE TECHNICIAN FOR THE BUSINESS, AARON WORST, RESPONDED TO THE SCENE AND ARRIVED AT APPROXIMATELY 0055 HOURS. I LEFT THE FIRE SCENE WITH MR. WORST.

J. THOMAS	F0022	02/28/02	
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CITY OF PHOENIX, ARIZONA  
FIRE REPORT

FIRE	02-028682	02/09/02

ON 2/09/02 PRIOR TO 2152 HOURS, A VAN FIRE OCCURRED INSIDE A COMMERCIAL OCCUPANCY LOCATED AT [REDACTED], WHICH IS [REDACTED] INC. THE FIRE CAUSED A TOTAL FIRE LOSS TO THE AIRBORNE EXPRESS VAN AND CAUSED SOME HEAT, SMOKE, AND WATER DAMAGE TO THE BUILDING ITSELF AND ADJACENT VEHICLES.

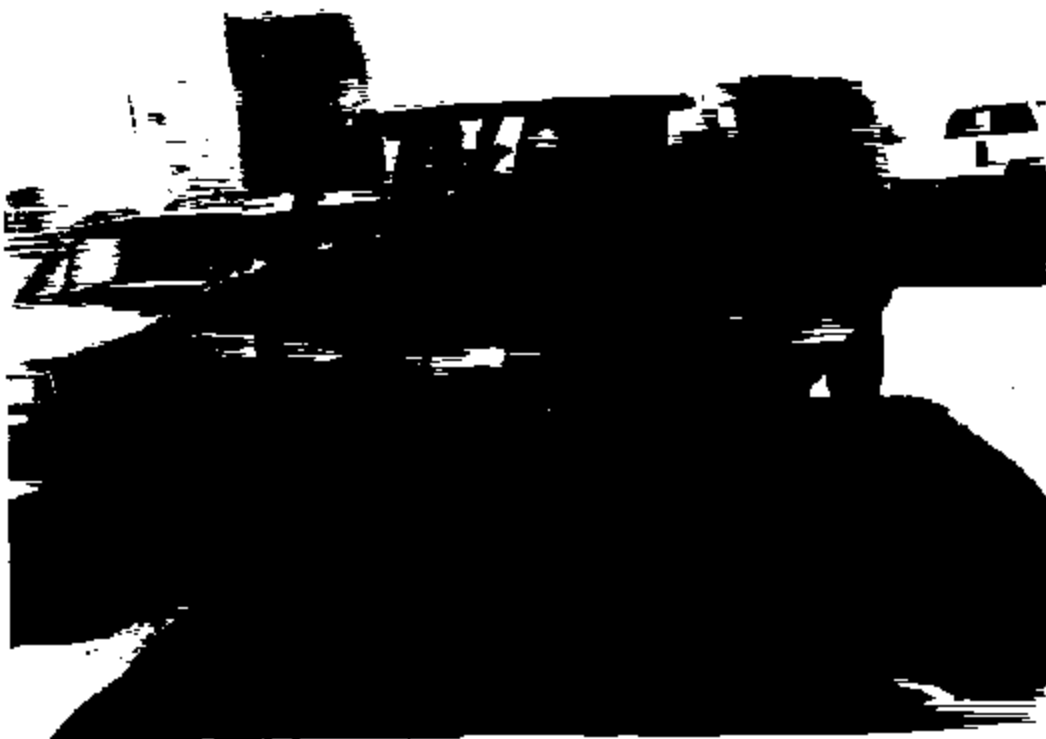
ON 2/09/02, I WAS WORKING AS CAR 505, ON-SHIFT INVESTIGATOR FOR THE PHOENIX FIRE DEPARTMENT. AT 2220 HOURS, I WAS PAGED BY THE PHOENIX FIRE DEPARTMENT ALARM ROOM HEADQUARTERS AND REQUESTED TO RESPOND TO THE ABOVE ADDRESS TO INVESTIGATE THE FIRE. I TELEPHONED THE ALARM ROOM HEADQUARTERS, TOLD THEM I WAS RESPONDING, AND DROVE TO THE SCENE IN MY CITY CAR. I ARRIVED ON SCENE AT 2238 HOURS.

AFTER I ARRIVED ON SCENE, I SPOKE WITH SOUTHWEST GAS REPRESENTATIVE JOE KHAUSE, TRUCK #3638, WHO SAID THERE WAS NO GAS SERVICE TO THE BUILDING AND UNDERGROUND TESTS WERE NEGATIVE. I ALSO SPOKE WITH A.P.S. REPRESENTATIVE MARK BERTAGNI, #13418, WHO REPORTED NO ELECTRICAL PROBLEMS WITH THE BUILDING. I INTERVIEWED CAPTAIN LEONARD HERNDON OF ENGINE 16, 'B' SHIFT, WHICH WAS THE FIRST-ARRIVING COMPANY ON SCENE. THEY WERE RESPONDING WITH A STRUCTURAL RESPONSE ASSIGNMENT TO A 911 CALLER WHO SAW SMOKE FROM THE BUILDING. UPON ENGINE 16'S ARRIVAL, THEY FOUND A SMOKE HAZE IN THE AREA AND CHECKED THE ROLLUP DOORS UNTIL THEY FOUND A WARM ONE, FORCED ENTRY THROUGH A METAL DOOR NEXT TO THE ROLLUP DOOR, AND TOOK A HANDLINE INSIDE WHERE THERE WAS HEAVY SMOKE, AND SPRINKLER HEADS GOING OFF. THEY LOCATED A VAN UNDERNEATH TWO SPRINKLER HEADS THAT WERE ACTIVATED. THERE WAS FIRE STILL BURNING IN THE INTERIOR OF THE VAN, WHICH THEY EXTINGUISHED WITH A HANDLINE. NO OTHER FIRE WAS FOUND IN THE BUILDING. FIRE CREWS THEN DEACTIVATED THE SPRINKLER SYSTEM, REPLACED THE SPRINKLER HEADS, AND RECHARGED THE SYSTEM. FIRE CREWS ALSO FORCED ENTRY BY BREAKING OUT A LOWER WINDOW SECTION LOCATED TO THE LEFT SIDE OF THE OFFICE DOOR MARKED #2.

I CONDUCTED AN EXTERIOR SURVEY OF THE BUILDING AND PHOTOGRAPHED AS I WENT. I FOUND NO EXTERIOR FIRE DAMAGE TO THE BUILDING. I NOTICED SEVERAL AIRBORNE EXPRESS VANS PARKED IN THE PARKING LOT.

I THOMAS	FD022	02/26/02	07/01
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PHOTOS



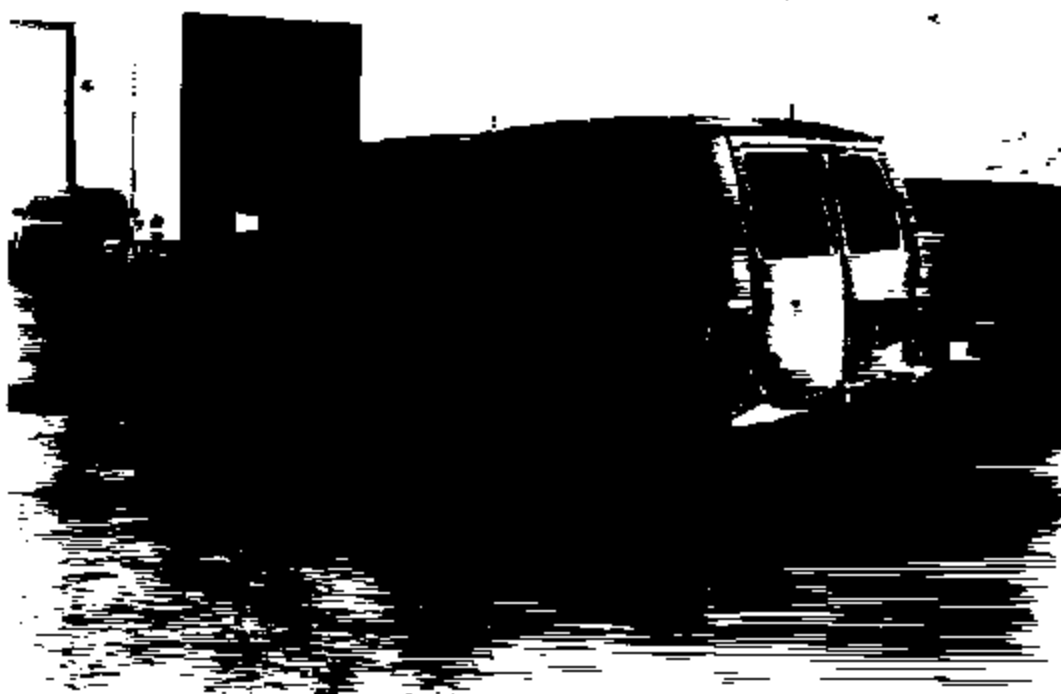
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**ANDLER & ASSOCIATES INC.**

P. O. Box 51304  
Phoenix, Arizona 85076  
(602) 866-9775

**PRIVILEGED AND CONFIDENTIAL**

**REPORT NUMBER ONE**

February 20, 2002

**PREPARED FOR:**

Marvin Sehestedt  
Ohio Casualty Group  
515 E. Carefree Highway, PMB 112  
Phoenix, AZ 85085

---

**INSURED/SUBJECT:**

[REDACTED]  
Phoenix, AZ [REDACTED]

**DATE OF LOSS:**

February 10, 2002 @ 10:00 p.m.

**CLAIM NUMBER:**

N/A

**FILE NUMBER:**

1001PA-2328

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THIS REPORT FURNISHED AS PRIVILEGED AND CONFIDENTIAL TO ADDRESSEE.  
RELEASE TO ANY OTHER COMPANY, CONCERN OR INDIVIDUAL IS SOLELY THE  
RESPONSIBILITY OF ADDRESSEE.

THE INFORMATION CONTAINED IN THIS REPORT WAS OBTAINED FROM PUBLIC  
RECORDS AND SOURCES. ANDLER & ASSOCIATES DOES NOT ASSUME RESPONSIBILITY  
FOR DISCREPANCIES, ERRORS OR OMISSIONS ARISING FROM OR MALFEASANCE OF  
SUCH RECORD CUSTODIANS.



[REDACTED]

## ASSIGNMENT

This assignment was received on February 13, 2002 from Marvin Sehestedt of Ohio Casualty Group Insurance. I was instructed to conduct an origin and cause investigation as a result of heavy smoke damage that occurred to the insured's place of business.

## SUMMARY

Cause of this loss is a fire of accidental origin as a result of an electrical malfunction that occurred in a customer's vehicle that is owned and operated by Air One of Arizona, Phoenix, Arizona. Vehicle has been identified as a 1997 E-250 Econoline van. This vehicle was parked inside the insured's place of business at the time of this fire.

## ENCLOSURES

1. 28 color photographs with descriptions
2. Work order from FMS

## FIRE SCENE EXAMINATION

Fire scene examination was conducted on February 13, 2002. Inspection was conducted and determined that heavy smoke development occurred inside the 6700 square foot repair shop that is used by Fleet Management Services to repair their client's fleet vehicles. At the time of my inspection, the subject vehicle had been removed from the structure and placed outside in a parking lot. However, photographs were taken and it was determined that heavy thick smoke development occurred inside the repair shop area with two overhead sprinkler heads that activated. I was informed that the sprinkler heads have since been replaced.

I then observed the small office area to the east of the shop and noticed light smoke damage only. There was no fire damage development inside the repair shop.

Examination of the vehicle does identify it as a 1997 E-250 Econoline van with a 4.2 liter engine. This is owned by Air One of Phoenix, Arizona. Vehicle identification number is 1FTHE2428VH [REDACTED] Odometer reading is 113,532.

A review of the Fleet Management Service work order does not identify any recent electrical work done by the FMS company. Vehicle had been brought into the shop for replacement of

[REDACTED]

brakes, tuneup, check all door operation, coolant, and replacing an intake gasket and motor mount. Examination of the vehicle was conducted in the parking lot area and I observed that heavy fire damage had occurred within the engine compartment extending past the firewall into the interior passenger compartment. Burn patterns observed indicate the point of origin to have been forward of the firewall within the engine compartment on the driver's side. This does indicate the location of the electrical fuse box. Examination of this area does indicate the presence of electrical arcing developing on copper strand wires in the area of the fuse box. The hood within this engine compartment was consumed. I also note, in the interior of the vehicle, that the intake manifold was removed by the mechanic of Fleet Management Services. It was identified to have been next to the doghouse between the two seats.

I further examined the fuel system and did not observe any physical evidence to indicate this to have been a fuel related caused fire.

I traced electrical wiring and found that the positive and negative cables were found connected to the battery located on the right side of the engine compartment. This would indicate that the electrical system was energized within the engine compartment at the time of this fire. I further noticed that combustible materials in the back of the van had sustained fire damage as well.

Observation of burn patterns along the firewall, left fender and front grill area indicate the point of origin to have been between the firewall and behind the grill on the left side of the engine compartment.

I then traced additional electrical wiring and did find that the insulation to the wiring loom along the firewall was consumed, however did not exhibit evidence of electrical arcing. As a result, the only area that sustained electrical arcing was the wiring leading to the fuse box located on the left side within the engine compartment. No physical evidence was collected at the fire scene.

As a result of this examination, it is my opinion that an electrical malfunction had occurred in and around the electrical fuse box to this vehicle.

While conducting this vehicle inspection, I note a similar vehicle which was also identified as a 1997 E-250 Econoline van parked in the parking lot area and owned by Air One. I then requested that the hood be lifted and I was able to photograph the location of the fuse box. This can be seen in photographs 24 and 25. I also note that the wiring loom behind the fuse box extends behind the radiator and is connected to the positive and negative battery posts located on the battery on the right side of the engine compartment. As a result of these findings, it is my opinion that the fire originated in and around the fuse box.

## INVESTIGATION

Interview was conducted with Wade Rimmer who stated that he has been an employee here at FMS for the last two months and that he has had over seventeen years as a mechanic. He stated that he has done no electrical work on the vehicle whatsoever. He did replace tires and was in the process of repairing the intake manifold and gasket. He stated that he did not damage any electrical wires and was working primarily in the doghouse area between the two seats. He stated that he did not work under the hood located in the front of the vehicle. He was instructed to remove the intake manifold and replace it and a gasket. He stated that the vehicle had not been running for at least five to six days prior to the fire. He stated that all his work had been completed behind the firewall after the doghouse was removed and he was in the process of installing the intake manifold and gasket. He also stated that he did not disconnect the battery prior to any work being conducted.

Mr. Rimmer stated that he believes the fire was, more than likely, electrical in origin seeing that there was no fuel lines compromised and the vehicle had not been started for at least six days prior to the fire. He also pointed out to me that the fire was extinguished by two overhead sprinklers located within the shop.

Contact was made with the service manager of FMS, Eric Goolsby. I requested that Mr. Goolsby review all work orders conducted on this particular vehicle to see if any electrical work might have been done in the area of the fuse box. Mr. Goolsby stated that he has found no invoices indicating any work done by FMS in relationship to any wiring under the hood that might have been replaced or any work in the area of the fuse box. He did state that a fuse was replaced to the brake system, however that was located in the area of the steering column.

## CAUSE AND ORIGIN

It is my opinion that the cause of this loss is a fire of accidental origin as a result of electrical malfunction that occurred in and around the fuse box of this vehicle. Evidence available to establish these findings is as follows:

1. Vehicle inspection
2. Examination of the vehicle does indicate evidence of electrical arcing in the wiring in and around the fuse box
3. Burn patterns consistent with the fire originating within the engine compartment forward of the firewall and behind the front grill located on the left side of the vehicle

  
Page 4

4. Information obtained from witnesses indicates that the vehicle had not been in use for approximately five to six days prior to the fire. As a result, this fire was not caused by any failed fuel lines or fuel related incidents.

#### COMMENTS

If additional investigation is needed on this file, please advise by calling me direct at 602-866-9775.

Patrick A. Andler  
Certified Fire Investigator



Photo 1. Smoke damage occurring to the shop

Photo 2. Identifies that the vehicle was placed at the same location where the red Corvette is in this photograph





Photo 3. Smoke damage occurring within the shop area

Photo 4. Smoke damage at ceiling level



Fleet



Photo 5. Identifies the replacement of the sprinkler head

Photo 6. Overall view of the shop



EP05-025-LC-7677

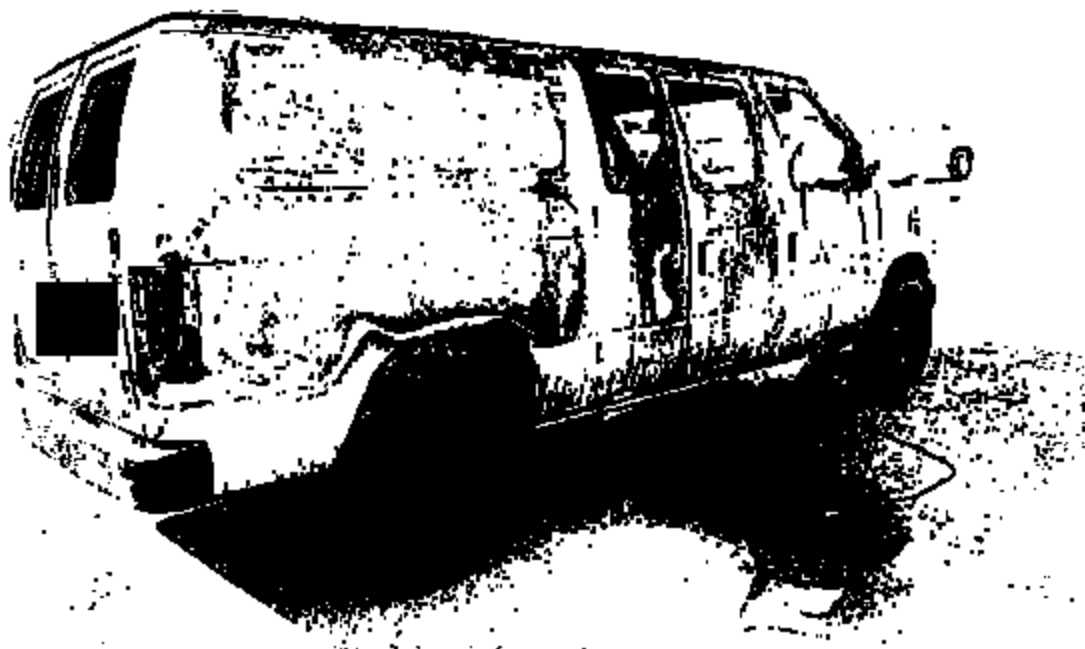


Photo 7. Right side of the van

Photo 8. Back end of the van





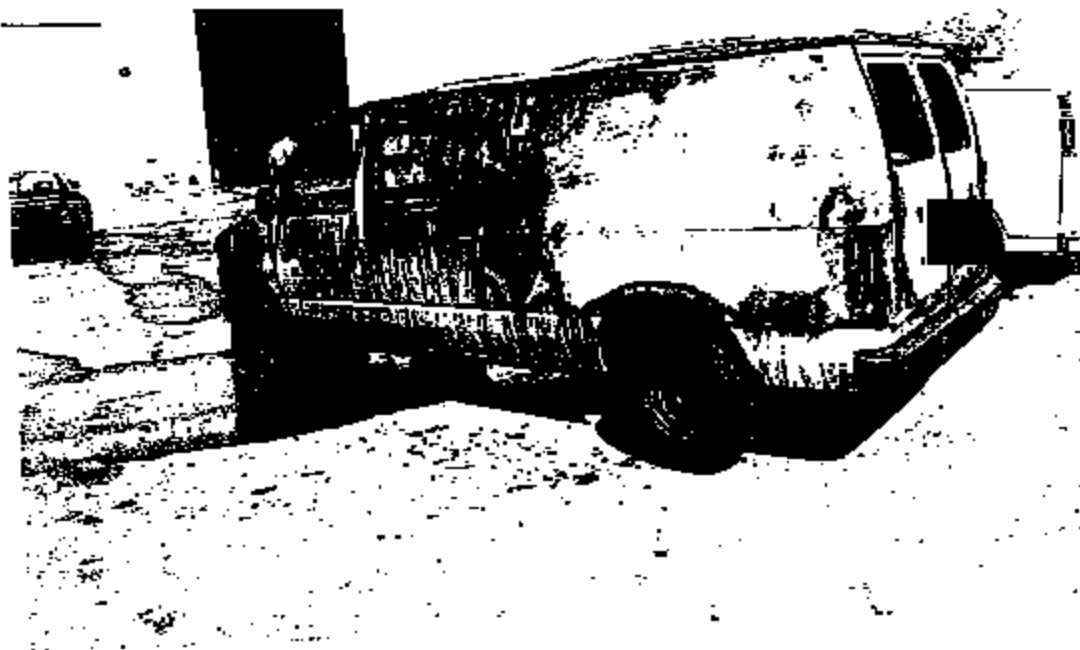


Photo 9. Left side of the van

Photo 10. Company logo

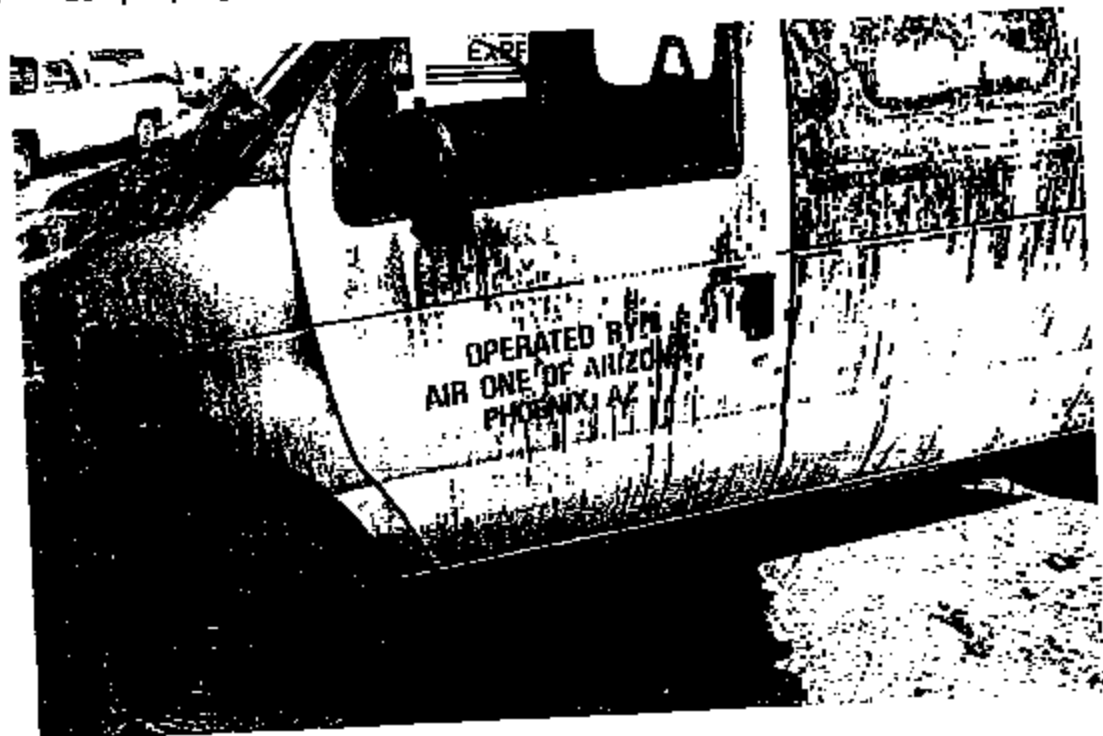




Photo 11. Front left side of the van

Photo 12. Front





Photo 13. Right side

Photo 14. Interior





Photo 15. Doghouse where the intake manifold was removed by the mechanic prior to the fire

Photo 16. Overall view of the front

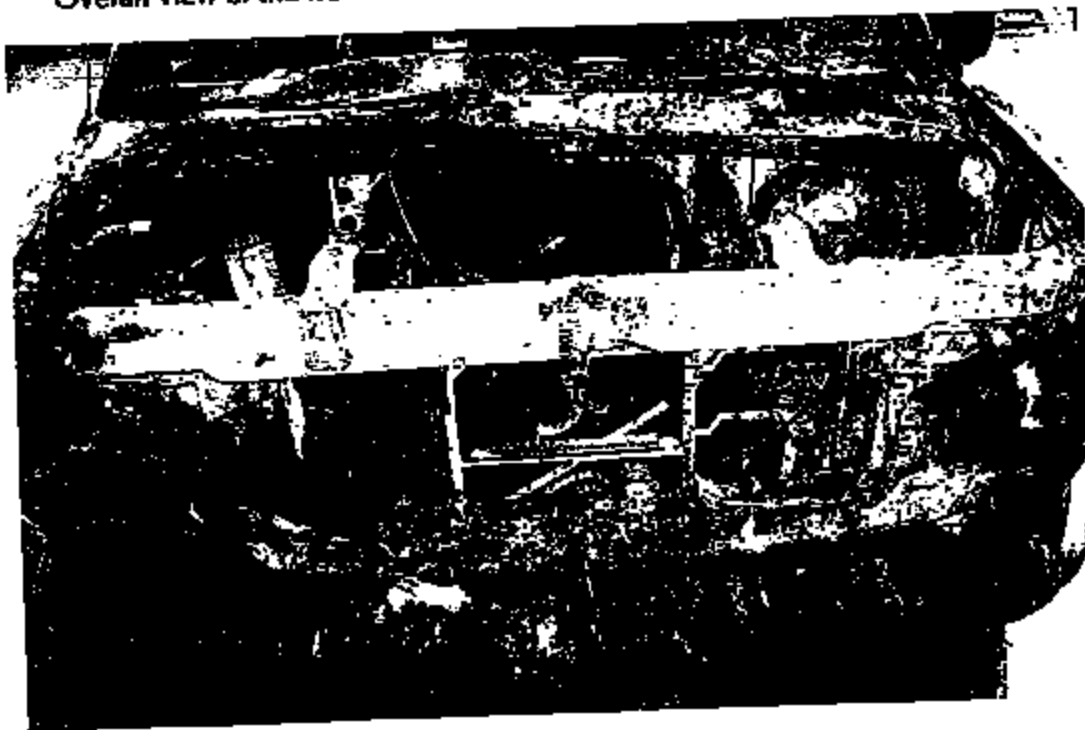




Photo 17. Battery

Photo 18. Wiring loom





Photo 19. Area of origin

Photo 20. Fuse block and point of origin





Photo 21. Wiring harness

Photo 22. Manufacturer number on the fuse block



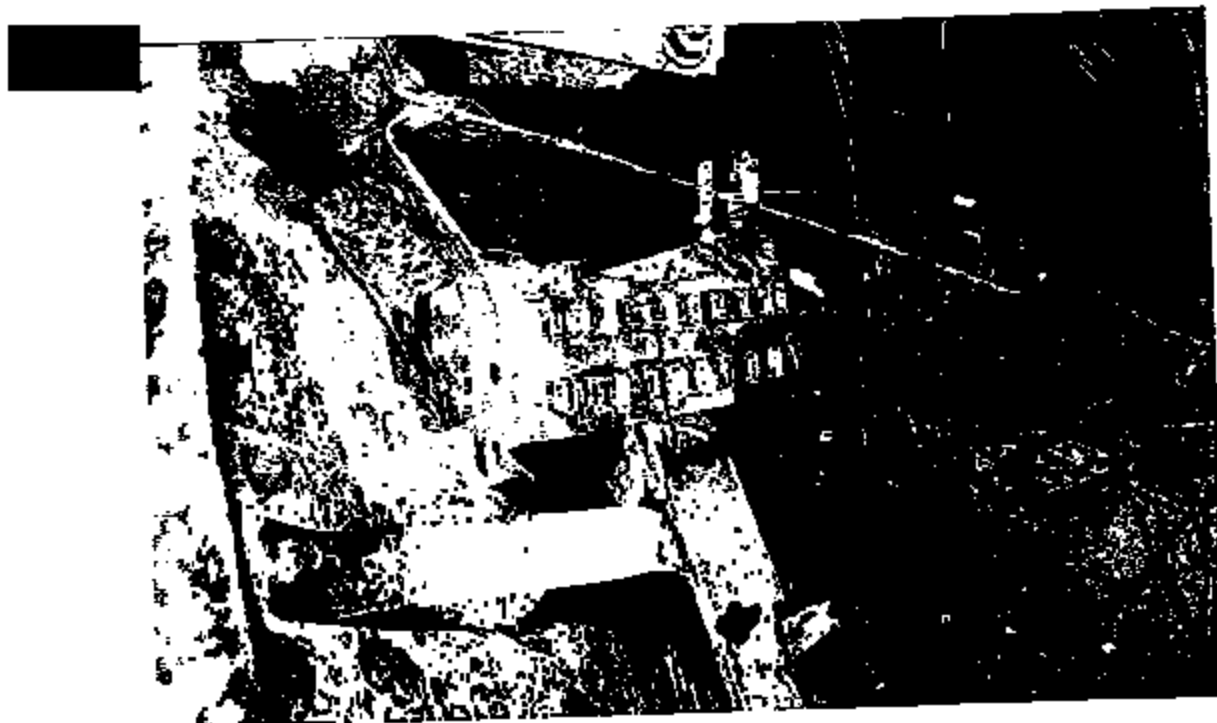


Photo 23. Subject fuse block and wiring

Photo 24. Exemplar fuse box

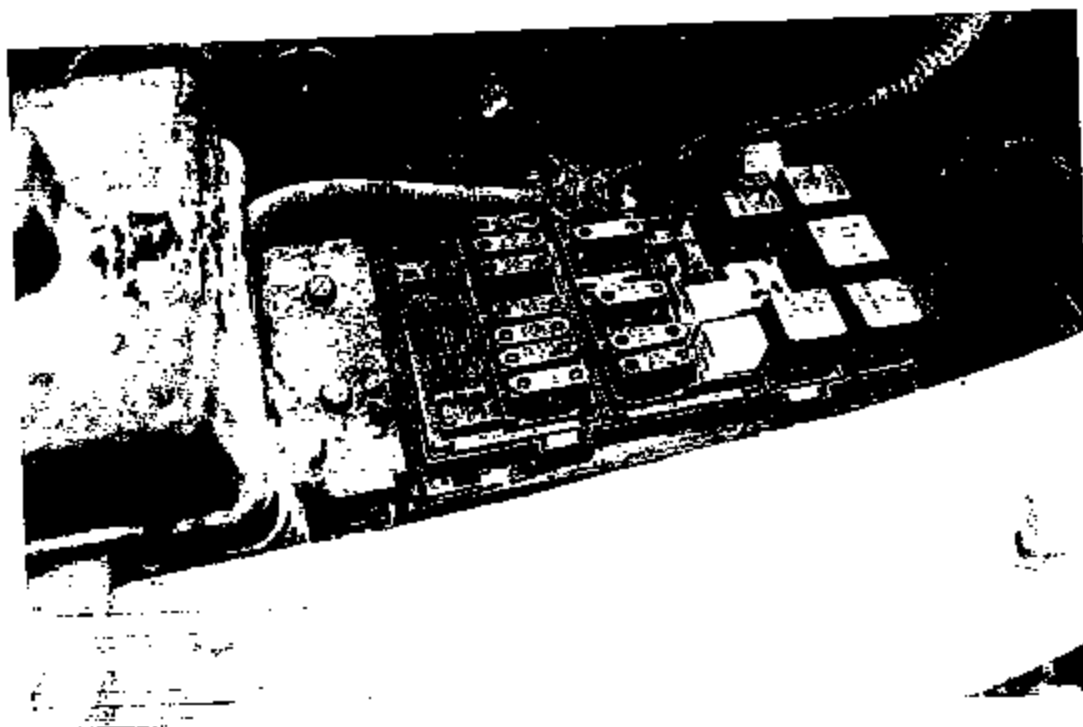






Photo 25. Exemplar fuse box

Photo 26. Identifies the point of origin

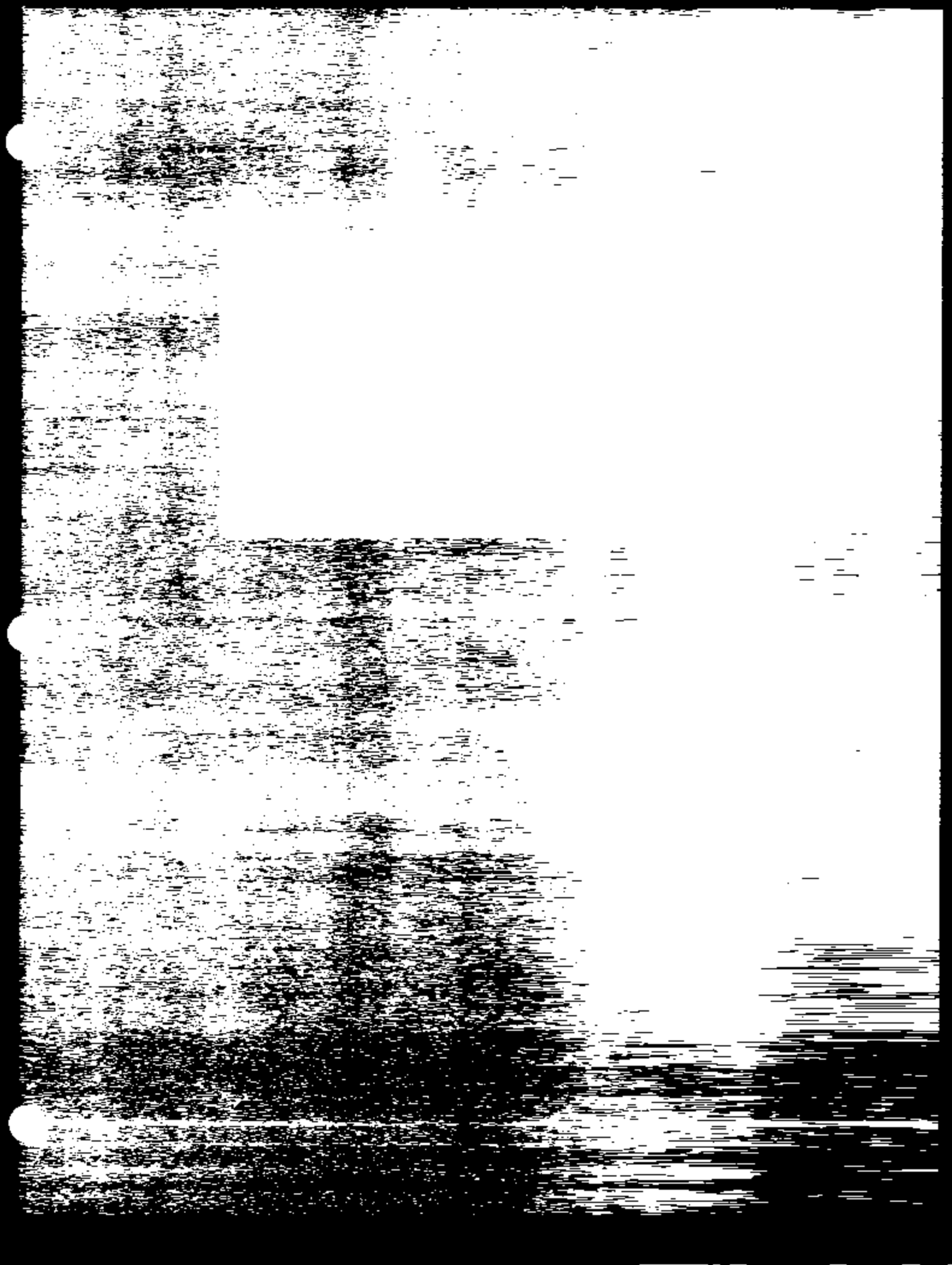




Photo 27. Identifies electrical arcing on the copper strand wiring leading to the fuse box

Photo 28. Identifies the point of origin





# HUSSER & CROMARTIE, L.L.C.

Attorneys at Law

(A limited liability company of professional corporations)

P.O. Box 1627

401 Broad Street, Suite 300

Roma, Georgia 30162-1627

John S. Husser, P.C.

email: jhusser@bellsouth.net

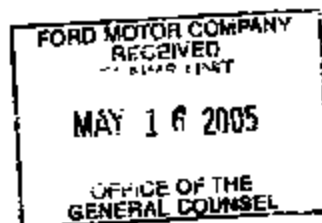
(706) 802-0251 Telephone

(706) 802-0252 Facsimile

May 10, 2005

## CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Ford Motor Company  
Attn: Legal Department  
One American Road  
Dearborn, Michigan 48126



Re: Letter of Representation and Notice of Claim

Our Clients: [REDACTED]

Vehicle: 2002 Ford F150 Lariat Pickup Truck (4-door)

VIN: 1FTRW08L02K [REDACTED]

Date of Loss: November 26, 2004

Gentlemen:

Please be advised that the undersigned has been retained by [REDACTED] and [REDACTED] relative to all matters arising out of that certain fire loss which occurred in Cedartown, Polk County, Georgia, on or about November 26, 2004.

The above-described incident occurred at approximately 4:00 a.m. at the [REDACTED] residence located at [REDACTED] Avenue, Cedartown, Polk County, Georgia. The residence was a 1250 sq. foot single family dwelling with attached carport which was being leased by [REDACTED] from its owners, the [REDACTED].

As a result of the fire, the dwelling and attached carport, all of the contents thereof and the [REDACTED] two (2) vehicles, which were parked in the carport, to wit: a 1998

Ford Motor Company  
Attn: Legal Department  
May 10, 2005  
Page Two

Honda Accord and the subject 2002 Ford F150 Lariat pickup truck, referenced above, were completely destroyed.

Please find enclosed herewith the following:

**Exhibit "A."** A copy of the file obtained from the Enforcement Division of the State of Georgia Office of Insurance and Safety Fire Commissioner regarding the fire loss indicating that the fire originated in the subject 2002 Ford F150 Lariat pickup truck, referenced above.

**Exhibit "B."** Copies of twenty-five (25) 4" x 6" photographs, numbered Photographs No. 1 through No. 25, depicting the fire damage to the subject house, its contents and the two vehicles.

**Exhibit "C."** An estimate provided by Greg Roberson Construction Company to [REDACTED] in the amount of \$136,640.00 to replace the subject house. [REDACTED] received \$79,000.00 from their homeowner's insurance carrier, Georgia Farm Bureau Insurance Company.

**Exhibit "D."** An itemization with estimated fair market values of the personal property and other items belonging to the Folsoms which were destroyed or damaged in the fire totaling \$43,709.00.

In addition, the Folsoms incurred approximately \$2,000.00 uninsured loss resulting from the destruction of the 1998 Honda Accord and approximately \$2,240.00 uninsured loss resulting from the destruction of the 2002 Ford F150 Lariat pickup truck. The Folsoms received a total of \$27,890.00 from their automobile liability insurance carrier, Georgia Farm Bureau Insurance Company, for the loss of their two vehicles, to-wit: \$6,340.00 for the 1998 Honda Accord and \$21,550.00 for the 2002 Ford F150 Lariat pickup truck.

It is our contention that a defect, mostly likely a defective cruise control switch, in

Ford Motor Company  
Attn: Legal Department  
May 10, 2005  
Page Three

the subject 2002 Ford *F150 Lariat* pickup truck proximately caused all of the losses and damages set forth above.

The subject 2002 Ford *F150 Lariat* pickup truck has been preserved and will be made available for inspection at your request at a mutually convenient time and place.

Request is hereby made that this letter of representation and notice of claim be directed to the appropriate individual and that the undersigned be contacted relative to this matter at the earliest possible date.

Thank you for your anticipated cooperation and attention to this matter.

Very truly yours,

JOHN S. HUSSER, P.C.

  
John S. Husser

JSH:cc

Enclosures: As indicated above

cc: *National Highway Traffic Safety Administration* w/Enclosures

 w/o Enclosures

 w/o Enclosures



# OFFICE OF INSURANCE AND SAFETY FIRE COMMISSIONER

**JOHN W. OXENDINE**  
COMMISSIONER OF INSURANCE  
SAFETY FIRE COMMISSIONER  
INDUSTRIAL LOAN COMMISSIONER  
COMPTROLLER GENERAL

December 31, 2004

SEVENTH FLOOR, WEST TOWER  
FLOYD BUILDING  
2 MARTIN LUTHER KING, JR. DRIVE  
ATLANTA, GEORGIA 30334  
(404) 656-2358 TDD: (404) 656-4031  
WWW.GAINSURANCE.ORG

[REDACTED]  
Rome, Georgia [REDACTED]

**RE: Open Records Request  
601 East Julia Peck Avenue  
File Number OR-04-552**

Dear [REDACTED]

This is in reference to your recent Open Records Request, enclosed please find the following copies of documents:

- (1) Copy of File from the Enforcement Division of the Office of Insurance and Safety Fire Commissioner regarding the above-referenced matter.
- (2) Copy of CD from the Enforcement Division of the Office of Insurance and Safety Fire Commissioner regarding the above-referenced matter.

According to O.C.G.A. §50-18-71(c), the charge for Department documents is \$.25 per page. As 20 pages and one CD are provided, kindly forward a check payable to the Georgia Insurance Department in the amount of \$5.25 to my attention.

However, please be advised that any personal information has been redacted to prevent an unwarranted invasion of personal privacy pursuant to O.C.G.A. §50-18-72(a)(1), (a)(2), (a)(11.1), (a)(11.3), (a)(13), and other relevant provisions of State and Federal law.

Should you have any questions or need additional information, please feel free to contact my office by facsimile at (404) 657-6399. With best regards.

Very truly yours,

  
L. J. Darter, III

Administrative Procedure Attorney

LJD/mds

Enclosures

EXHIBIT

"A"

**INSURANCE AND SAFETY FIRE COMMISSIONER'S OFFICE  
ENFORCEMENT DIVISION  
CASE MANAGEMENT SYSTEM**

☐ Juvenile

Case Number: 04-321-072

County: Polk

Date of loss: 11-26-2004

Form Number	Form/Report Name	Included
ISF-382-6 ✓	Initial Investigation Report	11-26-2004
ISF-6A ✓	Case Narrative	12-02-2004
ISF-6B	Incident Diagram	N/A
ISF-6D	Master Name Index/ACAN Report <input type="checkbox"/> Arrest(s) made	N/A
	<input type="checkbox"/> Indictments <input type="checkbox"/> Warrants <input type="checkbox"/> Dispositions	N/A
ISF-6E ✓	Photograph Log	12-02-2004
	<input type="checkbox"/> Photos <input type="checkbox"/> Negatives <input checked="" type="checkbox"/> CD	12-02-2004
ISF-6F	Letter Requesting Insurance Information (O.C.G.A. 25-2-33)	N/A
ISF-6G	Voluntary Statement (Not under arrest)	N/A
ISF-6I	Juvenile Rights <input type="checkbox"/> Juvenile Complaint Form	N/A
ISF-6J	Voluntary Statement (Under arrest)	N/A
ISF-K9	K9 Report Form	N/A
ISF-6M	Confidential Information Release	N/A
ISF-6N	Request for Bank Records	N/A
ISF-299	Receipt for Property <input type="checkbox"/> GBI Submission Form	N/A
	Laboratory Reports	N/A
ISF-310 ✓	Consent to Search <input type="checkbox"/> Search Warrant	11-26-2004
ISF-327	Miranda Statement	N/A
ISF-628	Report Release	N/A
	Fire Reports	11-26-2004
	Law Enforcement Reports	11-26-2004
	Records Obtained under O.C.G.A. 25-2-33	N/A
	Activity Log	N/A
	Field Notes	N/A
ISF-91 ✓	Status Report(s) <input type="checkbox"/> Active <input checked="" type="checkbox"/> Closed	12-02-2004

Signature of Officer: \_\_\_\_\_

*Jimmy Marshall*

Report Date: 12-02-2004

Reviewed By:  
INS 5

W.S. Sprouse, CFI

*[Signature]*

Review Date: 12/06/2004

**04321072**



**INSURANCE AND SAFETY FIRE COMMISSIONER'S OFFICE  
ENFORCEMENT DIVISION  
FIRE INVESTIGATION REPORT**

Case Number 04-321-072

Case Determination

☐ Arson

☐ Attempted Arson

☐ Bombing

☐ Accidental

☒ Undetermined

☐ Undetermined Pending Investigation

Property Type Single family dwelling

Inhabited? ☒ Yes ☐ No

Date Case Opened 11-26-2004

Date and Time Assistance Requested 11-26-2004 @ 06:15 hours

Address of Loss 601 East Jule Peck Ave

City Cedartown

County

Polk

Date of Loss 11-26-2004

Time of Loss 0401 hours

# Injuries N/A

# Fatalities N/A

Estimated Dollar Loss \$ 125,000.00

Smoke Detectors Present? Yes

Smoke Detectors Operational? yes

Department Requesting Assistance Cedartown Fire

Person Requesting Assistance Mollock

Name of Business (if applicable) None

OWNER: Name (Last, First MI) [REDACTED]

Date of birth [REDACTED]

Social security number [REDACTED]

Race [REDACTED]

Sex [REDACTED]

Address (if different from loss location) Unknown

Insurance Company Farm Bureau

Telephone 770-346-0375

Policy Number [REDACTED]

Coverage:

Structure:

Unknown

Contents

Unknown

Other

N/A

OCCUPANT: Name (Last, First MI) [REDACTED]

Date of birth [REDACTED]

Social security number [REDACTED]

Race [REDACTED]

Sex [REDACTED]

Insurance Company N/A

Telephone N/A

Policy Number N/A

Coverage:

Structure:

N/A

Contents

N/A

Other

N/A

**NARRATIVE:** One story single family dwelling destroyed by an early morning fire. The dwelling was located at the end of the street in a residential area. The male occupant woke-up to the sound of glass breaking and discovered a fire in the carpet area. The fire extended into the rear door and roof areas. The origin of this fire was determined to be in the motor area of a 2002 Ford F150. The fire destroyed the dwelling and truck. A 1998 Honda Accord was also damaged by this fire.

Report Submitted By Jimmy Maddox

Report Reviewed by W.S. Sprouse, CFI

All information contained in this report is confidential and is not to be disseminated except as allowed by law.  
ISF 382-6.

04321072

**INSURANCE AND SAFETY FIRE COMMISSIONER'S OFFICE  
ENFORCEMENT DIVISION  
CASE NARRATIVE**

Case Number: 04-321-072

**II. DESCRIPTION OF PROPERTY**

*This property was a one-story structure being used as a single family dwelling and was occupied at the time of loss.*

*The construction of the structure consisted of:*

*Foundation: block  
Exterior walls: brick  
Roof: shingles  
Interior walls: sheetrock  
Floor covering: carpet*

*The building was equipped with the following utilities:*

*Electrical service: Georgia Power  
Water service: Polk Water  
Telephone: BellSouth  
Gas: Georgia National  
Water heater: Gas  
Heating system: Gas  
Smoke detection: Yes*

*The building was approximately thirty years old and was approximately 1250 square feet in size.*

**III. INVESTIGATION**

*The investigation commenced on November 26, 2004 and involved an in-depth fire scene examination.*

*The alarm was received by Polk County 911. The name of the person that reported the fire is Ray Folsom. The Cedartown Fire Department responded and Cedartown Police Department. The weather conditions were clear. The doors were secure upon the arrival of the fire department. There were no signs of forced entry.*

*Present with me during the investigation were members of the Police and Fire Departments.*

*The attached photographs, along with the narrative portions of this report, provide a verbal and a pictorial representation of the fire scene examination conducted.*

**IV. FIRE SCENE EXAMINATION**

*Upon arrival the scene was secured by local officials. Legal entry was gained by consent from the occupants. The appropriate documentation can be found in the attachments to this report. The fire scene examination was begun with an exterior survey of the premises. This search revealed the home was located on a dead-end street in the city. From the exterior, it was noted that the carport end of the home had received the most fire damage. The roof system had been burned away on most of the home. I took photographs of the home from different angles. The truck in the carport was determined that it had received the most fire damage.*

Signature of Officer: Jimmy Maddox

Report Date: 12-8-04

**04321072**

ER05-005-LC-7709

During this systematic investigative process I continued to the interior of the building and examined the areas of least damage first. The kitchen was the first part of the home that I examined. The stove did not play a part in the cause of this fire. The examination continued toward the area of greater damage. The area of heaviest damage is in the area of the roof system over the remaining part of the home. The rear bedrooms had received fire damage from the fall down of the roof.

The point of origin was determined to be in the area of the motor of the 2002 Ford F350 truck. Obvious sources of ignition in the area of origin were investigated. The gas hot water in front of the truck was eliminated as a possible cause of the fire. However, the power distribution box located on the left side of the motor of the truck was confirmed to be the ignition factor of the fire. The owner of the truck stated that he has had problems with the cruise control and brake sensors.

Burn patterns showed that the fire extended from this area into the carport area. Samples were not taken.

#### V. DETERMINATION

With the information received and the on-scene investigation completed, it is my opinion that the origin and cause of this fire is a malfunction in the motor area of the truck.

Signature of Officer:

Jimmy Maddox

Report Date: 12-8-04

04321072

ER05-005-LC-7710



INSURANCE AND SAFETY FIRE COMMISSIONER'S OFFICE  
ENFORCEMENT DIVISION  
Suite 708, West Tower, Floyd Building  
2 Martin Luther King, Jr. Drive  
Atlanta, Georgia 30334

**NOTICE:** You have the right to refuse an entry to search your premises or vehicle. Either a search warrant or your permission must be obtained prior to a search being conducted.

**WAIVER OF CONSTITUTIONAL RIGHTS TO A SEARCH WARRANT**

(Date) 11-26-2004

(Case Number) 04-321-072

(City and County) Cocke County Polk

After having been informed of my constitutional right not to have a search made of the premises or vehicle here-in-after mentioned without a search warrant and of my right to refuse to consent to search, I hereby authorize

(Officer's name and title) Jimmy Maddox Investigator

of the GEORGIA INSURANCE AND SAFETY FIRE COMMISSIONER'S OFFICE, and others he/she may designate to assist him/her, to conduct a complete search of the below described premises or vehicle. These agents are authorized by me to take from the premises:

(Address of premises) 601 East Jule Pass

or vehicle: (Description of vehicle)

any papers, letters, documents or items of property whatsoever which they deem pertinent to their investigation. I further authorize the destruction of such items of negligible value when such items are no longer of evidentiary value, including but not limited to samples of fire debris, wood, carpet, soil, paper, plastic, or glass.

This written permission is being given by me to the above named person(s) voluntarily and without threats or promises of any kind. I understand that any items found as a result of my consent to this search without a warrant can and may be used as evidence against me in a court of law. I understand that this search may alter the scene including the movement of debris and the collection of evidence.

Witnessed by:

April Zolman  
Signature

256 51 9331  
Social security number

8/29/1971  
Date of birth

ISF-310

04321072

ERG-005-LC-7712

14502 FDID	GA State	11/28/2004 Incident Date	Station	2004585 Incident Number	0 Exposure	NFIRS - 1 Basic
---------------	-------------	-----------------------------	---------	----------------------------	---------------	--------------------

Location ☐ Address is on the Wildland Fire Module

Street Address

Number/Milepost Prefix Street or Highway Street Type Suffix

Apt./Suite/Room Cedartown City GA State Zip Code

Cross street or directions

Incident Type 111 Building fire Aid Given or Received None	Their FDID State Their Incident Number	Date & Times Alarm: 11/28/2004 04:01:00 Arrival: 11/28/2004 04:05:00 Controlled: 00:00:00 Last Unit: 11/28/2004 08:22:00	Shifts & Alarms B Shift Alm. Dist Special Studies
---	---	--	--

<b>Actions Taken</b>  11 Extinguish Primary Action Taken (1)  Additional Action Taken (2)  Additional Action Taken (3)	<b>Resources</b>  <input checked="" type="checkbox"/> Apparatus or Personnel Form Used <table border="1"> <thead> <tr> <th></th> <th>Apparatus</th> <th>Personnel</th> </tr> </thead> <tbody> <tr> <td>Suppression:</td> <td>0</td> <td>0</td> </tr> <tr> <td>EMS:</td> <td>0</td> <td>0</td> </tr> <tr> <td>Other:</td> <td>0</td> <td>0</td> </tr> </tbody> </table> <input type="checkbox"/> Resource counts include aid received		Apparatus	Personnel	Suppression:	0	0	EMS:	0	0	Other:	0	0						
	Apparatus	Personnel																	
Suppression:	0	0																	
EMS:	0	0																	
Other:	0	0																	
<b>Estimated Dollar Losses &amp; Values</b> <table border="1"> <thead> <tr> <th>LOSSES</th> <th></th> <th>None</th> </tr> </thead> <tbody> <tr> <td>Property:</td> <td>0</td> <td><input checked="" type="checkbox"/></td> </tr> <tr> <td>Contents:</td> <td>0</td> <td><input checked="" type="checkbox"/></td> </tr> <tr> <td>PRE-INCIDENT VALUE:</td> <td></td> <td></td> </tr> <tr> <td>Property:</td> <td>0</td> <td><input checked="" type="checkbox"/></td> </tr> <tr> <td>Contents:</td> <td>0</td> <td><input checked="" type="checkbox"/></td> </tr> </tbody> </table>	LOSSES		None	Property:	0	<input checked="" type="checkbox"/>	Contents:	0	<input checked="" type="checkbox"/>	PRE-INCIDENT VALUE:			Property:	0	<input checked="" type="checkbox"/>	Contents:	0	<input checked="" type="checkbox"/>	
LOSSES		None																	
Property:	0	<input checked="" type="checkbox"/>																	
Contents:	0	<input checked="" type="checkbox"/>																	
PRE-INCIDENT VALUE:																			
Property:	0	<input checked="" type="checkbox"/>																	
Contents:	0	<input checked="" type="checkbox"/>																	

<b>Casualties</b> <input checked="" type="checkbox"/> None  <table border="1"> <thead> <tr> <th></th> <th>Deaths</th> <th>Injuries</th> </tr> </thead> <tbody> <tr> <td>Fire Service:</td> <td>0</td> <td>0</td> </tr> <tr> <td>Civilian:</td> <td>0</td> <td>0</td> </tr> </tbody> </table>		Deaths	Injuries	Fire Service:	0	0	Civilian:	0	0	<b>Hazardous Materials Released</b> N None
	Deaths	Injuries								
Fire Service:	0	0								
Civilian:	0	0								
<b>Detector</b>	<b>Mixed Use Property</b>									

Property Use  
419 1 or 2 family dwelling

04321072

11502  
FDIDGa  
State11/28/2004  
Incident Date

Station

2004585  
Incident Number0  
ExposureNFIRS -1  
Notes

Notes

Title: Incident notes

Engine 12 and Engine 5 was dispatched to [REDACTED] for a 10-70 Structure Fire. On arrival we had two vehicles totally involved. Veh # 1- Honda auto, tag [REDACTED] polk county, Veh # 2 Ford Pickup, tag [REDACTED] polk county. The carport area also was totally involved, and the fire was extending into the attic area over the living room. The fire in the vehicles were knocked down, and we entered the structure at the front door. As entry was made inside the front door, fire was already in the attic. We pulled the ceiling in the living room and tried to stop the fire extension overhead. As the nozzle team made the hallway, the ceiling started falling in, and I pulled the firefighters out. During this time the fire extended the whole length of the attic, and was blowing out the gable vent. This attic fire had to be extinguished from the east gable vent. All of the occupants were out on our arrival. Detective Steve Molock was notified of this fire, where he could investigate because we were suspecting it to be an arson fire. When the Detective was notified, he notified the State Fire Marshall ( Jimmy Maddox .)

When the occupant arrived [REDACTED] I asked him what had happened. [REDACTED] said he and his wife April and their child arrived around 8:30 pm in the Ford Pickup. He said he left again to run to the store, and returned around 8:45pm or so. At some point he carried his gun, and deer stand, and put them in the pickup. At approximately 1:30 am [REDACTED] woke up and went to check the pickup to see if he locked it. At approximately 4:00am [REDACTED] heard glass breaking, and he went to the carport door and opened it. While he was going to door he said he heard a roaring sound, and when he opened it he seen fire all in the carport area. He then ran to get his wife and child, and they left the house. When they were leaving the house [REDACTED] said the truck was burning but the honda was not.

Captain Lee Wilkerson.

04321072

ER05-085-LC-7714

1502 FDID	Ga State	11/28/2004 Incident Dat.	Station	2004585 Incident Number	0 Exposure	NFIRS - 2 Fire
--------------	-------------	-----------------------------	---------	----------------------------	---------------	-------------------

#### Property Details

1 Est. number of residential units	<input type="checkbox"/> Not Residential	0.000 Acres burned	<input checked="" type="checkbox"/> None <input type="checkbox"/> Less than one acre
1 Number of buildings involved	<input type="checkbox"/> Buildings not involved		

#### On-Site Materials or Products

☒ None

On-site material (1)	Storage use (1)
On-site material (2)	Storage use (2)
On-site material (3)	Storage use (3)

#### Ignition

83 Engine area, running gear, wheel area  
Area of origin  
10 Heat from powered equipment, other  
Heat Source  
UU Undetermined  
Item first ignited ☐ Confined to object of origin  
UU Undetermined  
Type of material first ignited

#### Cause Of Ignition

☐ Exposure Report  
5 Cause under investigation  
Cause

#### Factors Contributing To Ignition

☒ None  
NN None  
Factor contributing to ignition (1)  
Factor contributing to ignition (2)

#### Human Factors Contributing To Ignition

☒ None

☐ Asleep  
☐ Possibly impaired by alcohol or drugs  
☐ Unattended person  
☐ Possibly mentally disabled  
☐ Physically disabled  
☐ Multiple persons involved

☐ Age was a factor

Estimated age of person involved

Sex of person involved

04321072



11502 FDID	Ga State	11/25/2004 Incident Date	Station	2004585 Incident Number	0 Exposure	NFIRS-2 Fire
---------------	-------------	-----------------------------	---------	----------------------------	---------------	-----------------

**Equipment Involved in Ignition**☒ None

NNN None  
Equipment code

Brand:  
Model:  
Serial #:   
Year: 0

**Equipment Power****Equipment Power Source Code****Equipment Portability**

☐ Portable  
☐ Stationary

**Fire Suppression Factors**☒ None

Fire suppression factor (1)

Fire suppression factor (2)

Fire suppression factor (3)

**Mobile Property Involved**☒ None

- ☐ Not involved in ignition, but burned  
☐ Involved in ignition, but did not burn  
☐ Involved in ignition and burn

Mobile property model 0  
Year

License Plate Number State VIN Number

**Mobile Property Type & Make****Mobile property type****Mobile property make****Local Use**☐ Pre-Fire Plan Available

- ☐ Arson report attached  
☐ Police report attached  
☐ Coroner report attached  
☐ Other reports attached

04321012

11502 FDID	Ga State	11/28/2004 Incident Dat	Station	2004585 Incident Number	0 Exposure	NFIRS-3 Struct. Fire
---------------	-------------	----------------------------	---------	----------------------------	---------------	-------------------------

Structure Type  
1 Enclosed building  
Structure type code

Building Status  
2 Occupied and operating  
Building status code

Building Height  
1  
Total stories at or above grade  
0  
Total stories below grade

Main Floor Size  
0  
Total square feet  
80 Length in feet BY 40 Width in feet

#### Fire Origin

1 ☐ Below grade  
Story of fire origin

☐ Confined to room of origin  
☐ Confined to floor of origin  
☒ Confined to building of origin  
☐ Beyond building of origin

#### Number Of Stories Damaged By Flame

0 # of stories with no damage  
0 # of stories with significant damage  
0 # of stories with heavy damage  
1 # of stories with extreme damage

#### Material Contributing Most To Flame Spread

☐ No Flame Spread  
UU Undetermined  
Mean contributing most to flame spread  
UU Undetermined  
Type of material contributing most to flame spread

#### Presence of Detectors

☐ None Present  
☒ Present  
☐ Undetermined

#### Detector Power Supply

1 Battery only  
Power supply code

#### Detector Effectiveness

1 Alerted occupants, occupant  
Effectiveness code

Detector Type  
1 Smoke  
Detector type code

Detector Operation  
2 Detector operated  
Operation code

Detector Failure Reason  
Failure reason code

#### Automatic Extinguishment System

☒ None Present  
☐ Present

#### Automatic Extinguishment System Operation

System operation code

#### Automatic Extinguishment System Failure Reason

Failure reason code

#### Type of Automatic System

Type automatic system code

Number of Sprinkler  
Heads Operating: 0

04321072

EA85-825-LC-7717

11502 FDID	Ga State	11/28/2004 Incident Date	Station	2004585 Incident Number	0 Exposure	NFIRS - 9 Apparatus
---------------	-------------	-----------------------------	---------	----------------------------	---------------	------------------------

Unit ID:	E- 12	Dispatched:	11/28/2004	04:01:00	Use:	Suppression
Serial #:	1FVABXAK83	Enroute:		00:00:00		
Type:	11 Engine	Arrival:	11/28/2004	04:05:00		
		Clear:	11/28/2004	09:22:00		
		In Quarters:		00:00:00		

**Actions Taken**

1)	3)
2)	4)

Personnel ID	Name	Rank
Coleman, Matt	FF/FR Matt Coleman	FF/FR
Rogers, Barry	FF/EMT34246 Barry Rogers	FF/EMT34246
Sorrells, Ricky	Lt Ricky Sorrells	Lt
Wilkerson, Lee	Capt. Lee Wilkerson	Capt.

Unit ID:	E- 4	Dispatched:	11/28/2004	04:01:00	Use:	Suppression
Serial #:	4P1CTD202RA	Enroute:		00:00:00		
Type:	11 Engine	Arrival:	11/28/2004	04:05:00		
		Clear:	11/28/2004	09:22:00		
		In Quarters:		00:00:00		

**Actions Taken**

1)	3)
2)	4)

Personnel ID	Name	Rank
Shuman, Jason	FF Jason Shuman	FF
Smith, Norman	Eng./EMT29139 Norman Smith	Eng./EMT29139

Unit ID:	E- 5	Dispatched:	11/28/2004	04:01:00	Use:	Suppression
Serial #:	1FDYD8OU8H	Enroute:		00:00:00		
Type:	11 Engine	Arrival:	11/28/2004	04:05:00		
		Clear:	11/28/2004	09:22:00		
		In Quarters:		00:00:00		

**Actions Taken**

1)	3)
2)	4)

Personnel ID	Name	Rank
Jackson, Calvin	Lt Calvin Jackson	Lt

04321072

EP05-005-LC-7716

1150Z FDID	Ga State	11/26/2004 Incident Dat.	Station	2004585 Incident Number	0 Exposure	NFIRS - 9 Apparatus
Unit ID:	R- 10	Dispatched:	11/26/2004	04:01:00	Use: Suppression	
Serial #:		Enroute:		00:00:00		
Type:	71 Rescue unit	Arrival:	11/26/2004	04:05:00		
		Clear:	11/26/2004	09:22:00		
		In Quarters:		00:00:00		
Actions Taken						
1)		3)				
2)		4)				
Personnel ID		Name		Rank		
Ferrell, William		FF/FR William Ferrell		FF/FR		

04321072

E995-885-LC-7719

# Cedartown Police Department GA1150100

118 N. Philpot St. P.O. Box 389 Cedartown, GA 30125

## Offense / Incident Report

Report Date <b>11/26/2004</b>		Type of Incident <b>FIRE INVESTIGATION</b>		Complaint No. <b>04-02875</b>		Status		Page <b>1</b>	
Incident Date/Time: <b>11/26/2004 01:00</b>		Occurred On <b>Friday</b>		<b>11/26/2004 01:00</b>		<b>to</b>		<b>Friday 11/26/2004 04:30</b>	
Incident Location: Description <b>PRIVATE RESIDENCE</b>						Lat.		Lon.	
Sub/Box <b>[REDACTED]</b>		Street <b>[REDACTED]</b>		Apt. <b>[REDACTED]</b>		City <b>CEDARTOWN</b>		St. <b>GA</b> Zip <b>[REDACTED]</b>	
Geo Code		Sector		Wind		Jurisdiction <b>CITY</b>			
Met. Op. <b>SUSPICIOUS FIRE</b>		Weather <b>CLEAR/COLD</b>		ITY		Eyed. Sels. <b>Yes</b>		Neig. Carr. <b>No</b>	
Category: <b>ADMINISTRATIVE REPORT</b>				Investigator Assigned: <b>DSN 229</b>		Name <b>MOLOCK, STEVE</b>			
Complainant/Reporting Party:									
Name <b>[REDACTED]</b>		Sex <b>[REDACTED]</b>		Race <b>[REDACTED]</b>		DOB <b>[REDACTED]</b>		Age <b>[REDACTED]</b>	
SSN <b>[REDACTED]</b>		ID <b>[REDACTED]</b>		Home ( ) <b>[REDACTED]</b>		Bus. <b>[REDACTED]</b>		Alt. <b>[REDACTED]</b>	
Sub/Box <b>[REDACTED]</b>		Street <b>[REDACTED]</b>		Apt. <b>[REDACTED]</b>		City <b>CEDARTOWN</b>		St. <b>GA</b> Zip <b>[REDACTED]</b>	
Received Date <b>11/26/2004</b>		Received Time <b>04:00</b>		Dispatch Date <b>11/26/2004</b>		Dispatch Time <b>04:01</b>		Officer Arrival Time <b>04:03</b>	
								Officer Departure Time <b>09:30</b>	
Victim Information									
Name <b>[REDACTED]</b>		Relation to Subject		Sex <b>[REDACTED]</b>		Race <b>[REDACTED]</b>		DOB <b>[REDACTED] 372</b>	
SSN <b>[REDACTED]</b>		ID <b>[REDACTED]</b>		Home ( ) <b>[REDACTED]</b>		Alt. <b>[REDACTED]</b>		Age <b>[REDACTED]</b>	
Sub/Box <b>[REDACTED]</b>		Street <b>[REDACTED]</b>		Apt. <b>[REDACTED]</b>		City <b>CEDARTOWN</b>		St. <b>GA</b> Zip <b>[REDACTED]</b>	
Injured <b>No</b>		Injury Type		Hospital Disposition		Present: <b>No</b>			
Victim Statement:									
<p>On Friday Morning November 26th, 2004 I, Detective Moloock spoke to Mr. [REDACTED] at the scene of a fire at his residence located at [REDACTED] Cedartown, Georgia.</p> <p>[REDACTED] stated that he, his wife April and their [REDACTED] year old daughter went to bed last night sometime after 9:30 p.m.</p> <p>[REDACTED] stated that before going to bed he loaded his hunting gear into his truck because he was going hunting early this morning.</p> <p>Around 1:30 a.m. [REDACTED] stated that he woke up and thought that he had forgotten to lock his truck when he put his hunting gear into his truck, he got up, went outside, locked the doors and then returned to bed.</p> <p>Sometime around 3:30 or 4:00 a.m. [REDACTED] stated that he woke hearing some strange noise that sounded like glass breaking, it seemed to be coming from the area of the kitchen entrance of the house or the carport.</p> <p>[REDACTED] said he thought someone was trying to get into his house so he went and got his gun, came into the kitchen and then opened the door.</p> <p>[REDACTED] stated that when he opened the door he was immediately pushed back by flames and heat, he ran to the bedrooms and woke his family and they made it out of the house.</p> <p>[REDACTED] was going to try to put out some of the fire with a garden hose until the fire department arrived however, the house and two cars were burning and he was not able to do very much.</p>									
Reporting Officer <b>MOLOCK, STEVE # 229</b>						Approving Officer (Cover Pages Only)			

04321072

EN05-005-LC-7720

# Cedartown Police Department GA1150100

118 N. Philpot St. P.O. Box 389 Cedartown, GA 30123

## Offense / Incident Report

Report Date <b>11/26/2004</b>	Type of Incident <b>FIRE INVESTIGATION</b>	Complaint No. <b>04-02875</b>	Status	Page <b>2</b>						
Markings/Scars/Tattoos/Description										
<b>Victim Information</b>										
Name [REDACTED] SSN [REDACTED] DOB [REDACTED] Age [REDACTED] Height [REDACTED] Weight [REDACTED] Hair [REDACTED] Eyes [REDACTED] City CEDARTOWN St. GA Zip [REDACTED]	Relation to Suspect [REDACTED] Home [REDACTED] Alt. [REDACTED] Appt. [REDACTED] Hospital Disposition [REDACTED] Pronouns No	Approving DEN								
Markings/Scars/Tattoos/Description										
<b>Victim Information</b>										
Name [REDACTED] SSN [REDACTED] DOB 11 Age 8 Height [REDACTED] Weight [REDACTED] Hair [REDACTED] Eyes [REDACTED] City CEDARTOWN St. GA Zip [REDACTED]	Relation to Suspect [REDACTED] Home [REDACTED] Alt. [REDACTED] Appt. [REDACTED] Hospital Disposition [REDACTED] Pronouns No	Approving DEN								
Markings/Scars/Tattoos/Description										
<b>Property List</b>										
Quantity	Description Make	Model	SN	Reference No.	Disposition	Total Value Recovered DEN / Date				
1	SINGLE STORY HOUSE				DESTROYED	99000.00 11				
Markings/Scars/Tattoos/Description										
1	FORD TRUCK				DAMAGED / DESTROYED	15000.00 11				
Markings/Scars/Tattoos/Description										
1	HONDA CAR				DESTROYED	10000.00 11				
<table style="width: 100%;"> <tr> <td style="width: 40%;">Number of Life Items 3</td> <td style="width: 20%;">Total Value 115000.00</td> <td style="width: 20%;">Total Recov. Value</td> <td style="width: 20%;">0.00</td> </tr> </table>							Number of Life Items 3	Total Value 115000.00	Total Recov. Value	0.00
Number of Life Items 3	Total Value 115000.00	Total Recov. Value	0.00							
Reporting Officer MOLOCK, STEVE # 228				Approving Officer (Cover Pages Only)						

Printed 11/26/2004 10:23:41 AM

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04321072

EA05-085-LC-7721

# Cedartown Police Department GA1150100

118 N. Philpot St. P.O. Box 389 Cedartown, GA 30123

## Offense / Incident Report

Report Date <b>11/26/2004</b>	Type of Incident <b>FIRE INVESTIGATION</b>	Complaint No. <b>04-02873</b>	Status	Page <b>3</b>
Markings/Scene/Traffic/Description  				
<b>Witness Information</b>				
Name [REDACTED]	Sex [REDACTED]	Race [REDACTED]	DOB [REDACTED] 1972	Age [REDACTED]
SSN [REDACTED]	ID [REDACTED]	Home ( ) [REDACTED]	Alt. [REDACTED]	Res. [REDACTED]
Street [REDACTED]	Street [REDACTED]	Appt. [REDACTED]	City CEDARTOWN	St. GA Zip [REDACTED]
Markings/Scene/Traffic/Description  				
<b>Witness Information</b>				
Name WILKERSON, LEE	Sex [REDACTED]	Race [REDACTED]	DOB [REDACTED] 1968	Age [REDACTED]
SSN [REDACTED]	ID CEDARTOWN FIRE	Home [REDACTED]	Alt. [REDACTED]	Res. [REDACTED]
Street 61	Street 118 N. PHILPOT STREET	Appt. [REDACTED]	City CEDARTOWN	St. GA Zip [REDACTED]
Witness Statement: On Friday Morning November 26th, 2004 Cedartown Fire Department was dispatched to a structure fire at a private residence at [REDACTED] in Cedartown, Ga. At approximately 06:30 hours I, Detective Malock arrived after being requested by Captain Lee Wilkerson and Sergeant Carl Rice to respond to the location because they agreed that the origin of the fire was questionable to them. I spoke to Captain Wilkerson at the scene, he stated that when they arrived on the scene they found the structure and two vehicles burning. After extinguishing the flames that had engulfed the structure Captain Wilkerson and other firemen on the scene could not readily locate the source of the fire and it appeared that the fire had started from a gas water heater or from a vehicle parked under the carport. Markings/Scene/Traffic/Description  				
Markings/Scene/Traffic/Description  				
<b>Narrative</b>				
On Friday Morning November 26th, 2004 at approximately 06:00 hours I, Detective Malock was contacted by Polk County E-911 Dispatch who stated that I had been requested to respond to a suspicious fire at a residence located at [REDACTED] Peak Avenue in Cedartown. At approximately 06:30 hours I arrived at the scene and Cedartown Firemen were still in the process of putting out some difficult spots where the fire was not completely extinguished. When I was able to go near the structure and could see that I would not be able to determine the cause or location of where the fire started I immediately contacted Mr. Jimmy Mattox of The State Insurance Commissioner's Arson Investigation Unit and Mr. Mattox stated that he would be on his way to the scene.				
Reporting Officer MOLLOCK, STEVE # 238		Approving Officer (Cover Page Only)		

Printed 11/26/2004 10:23:41 AM

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04321072

ER85-885-LC-7722

# Cedartown Police Department GA1150100

115 N. Palmer St. P.O. Box 309 Cedartown, GA 30115

## Offense / Incident Report

Report Date <b>11/26/2004</b>	Type of Incident <b>FIRE INVESTIGATION</b>	Complaint No. <b>04-02875</b>	Status	Page <b>4</b>
----------------------------------	---	----------------------------------	--------	------------------

<b>Supplemental</b> <span style="float: right;">Approving DEN</span>				
Supp. No. <b>0001</b>	Date <b>11/26/2004</b>	Time <b>18:17</b>	DEN <b>228</b>	Officer Name <b>MOLOCK, STEVE</b>
<p><b>Short Description: JIMMY MADDOX STATE FIRE INVESTIGATOR</b></p> <p>Mr. Jimmy Maddox State Fire Investigator was requested to come to the scene of this fire.</p> <p>When Investigator Maddox arrived at the scene he conducted an arson investigation and photographed the scene.</p> <p>At the time of this report the origin of the fire is undetermined. it appears that the fire was concentrated in the area of the curport around the ford truck.</p>				
Reporting Officer <b>MOLOCK, STEVE # 228</b>			Approving Officer (Cover Pages Only)	

Printed 11/26/2004 10:23:41 AM

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E985-005-LC-7723



# Cartown Police Department GA1150100

118 N. Philpot St. P.O. Box 389 Cartown, GA 30125

## Supplemental Report

Report Date 11/26/2004	Type of Incident FIRE INVESTIGATION	Complaint No. 84-82875	Status	Page 1
Supplemental No. 0001	Date 11/26/2004	Time 10:17	DEN 220	Officer Name MOLOCK, STEVE
Sealed NO				
Short Description: JIMMY MADDOX STATE FIRE INVESTIGATOR				
<p><b>Supplemental Narrative:</b></p> <p>Mr. Jimmy Maddox State Fire Investigator was requested to come to the scene of this fire.</p> <p>When Investigator Maddox arrived at the scene he conducted an arson investigation and photographed the scene.</p> <p>At the time of this report the origin of the fire is undetermined. It appears that the fire was concentrated in the area of the carport around the ford truck.</p>				
Reporting Officer MOLOCK, STEVE # 220			Approving Officer	

Printed 11/26/2004 10:23:53 AM

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04321072

ER85-005-LC-7724

INSURANCE AND SAFETY FIRE COMMISSIONER'S OFFICE  
ENFORCEMENT DIVISION  
CASE STATUS REPORT

Case Number: 04-321-072

Case Name: Grindstaff

☐ ACTIVE

☒ CLOSED

ACTIVE CASES:

- ☐ The investigation is continuing and the following steps are being taken:

Explain: \_\_\_\_\_

- ☐ Outstanding Warrant(s):

Number(s): \_\_\_\_\_

Date: \_\_\_\_\_

Charge(s): \_\_\_\_\_

Explain: \_\_\_\_\_

- ☐ Case pending litigation.

- ☐ New evidence has been obtained which warrants further investigation.

Explain: \_\_\_\_\_

- ☐ This case is being transferred to ISF Investigator: \_\_\_\_\_

Case number: \_\_\_\_\_

CLOSED CASES:

- ☐ Case has been adjudicated. Attach supplemental report and final court disposition.

- ☐ Exceptionality Cleared

Explain: \_\_\_\_\_

- ☒ Accidental Fire

- ☐ I have investigated this case and have been unable to obtain sufficient evidence to warrant further investigation at this time.

Signature of Officer: \_\_\_\_\_

*Jimmy Maddox*

Date: 12-02-2004

Reviewed By: W.S. Spruice, CFI  
ISF 91.

*W.S. Spruice*

Date: 12/06/2004

04021612

**Person/Entity Involved**

Business name  
Mr. [REDACTED]  
Mr., Ms., Mrs. First Name MI Last Name

Phone Number

Suffix

Number Prefix Street or Highway

Street Type

Suffix

Post Office Box

Apt./Suite/Room

Cedartown

City

GA

State

Zip Code

**Owner**

Business name

Phone Number

Mr., Ms., Mrs. First Name MI Last Name

Suffix

Number Prefix Street or Highway

Street Type

Suffix

Post Office Box

Apt./Suite/Room

Cedartown

City

GA

State

Zip Code

**Authorization**

Officer in charge: Wilkerson, Lee  
Eng-12  
Assignment

Signature:

11/26/2004  
Date

Capt. Lee Wilkerson

Member making report: Wilkerson, Lee  
Eng-12  
Assignment

Signature:

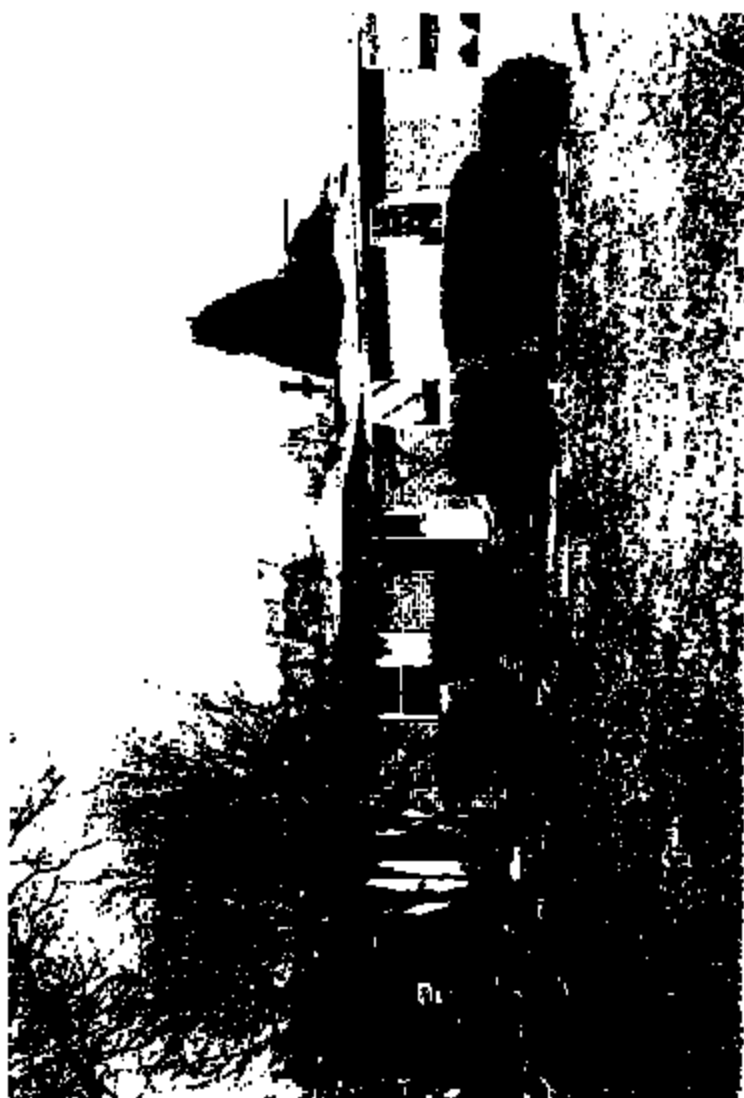
11/26/2004  
Date

Capt. Lee Wilkerson

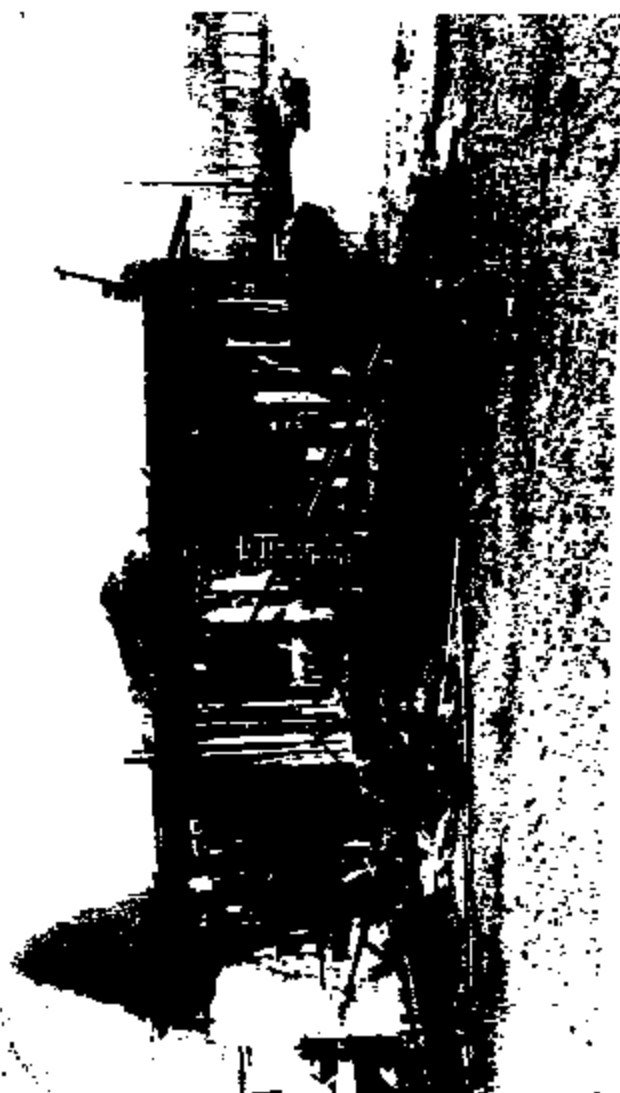
04321072

EA05-905-LC-7728

#1



#2



#3

ERB-665-LC-7727

EXHIBIT

"B"

#4



#5



EP05-005-LC-7728

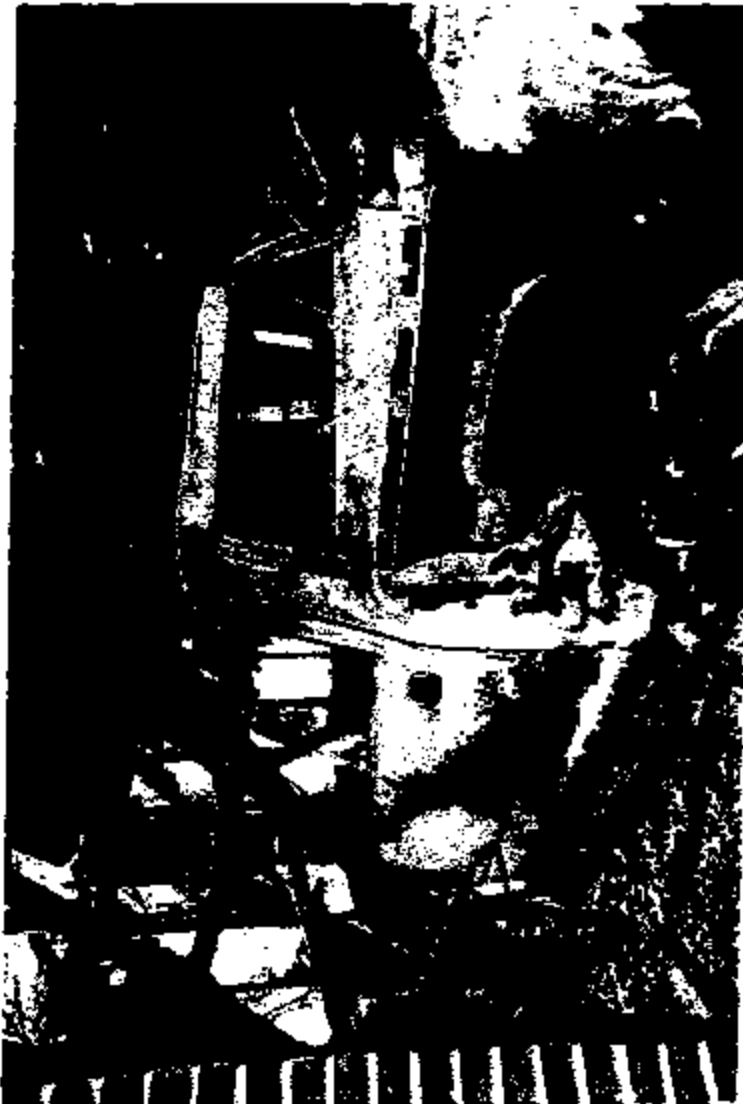


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#8



ERG-885-LC-7738



#9

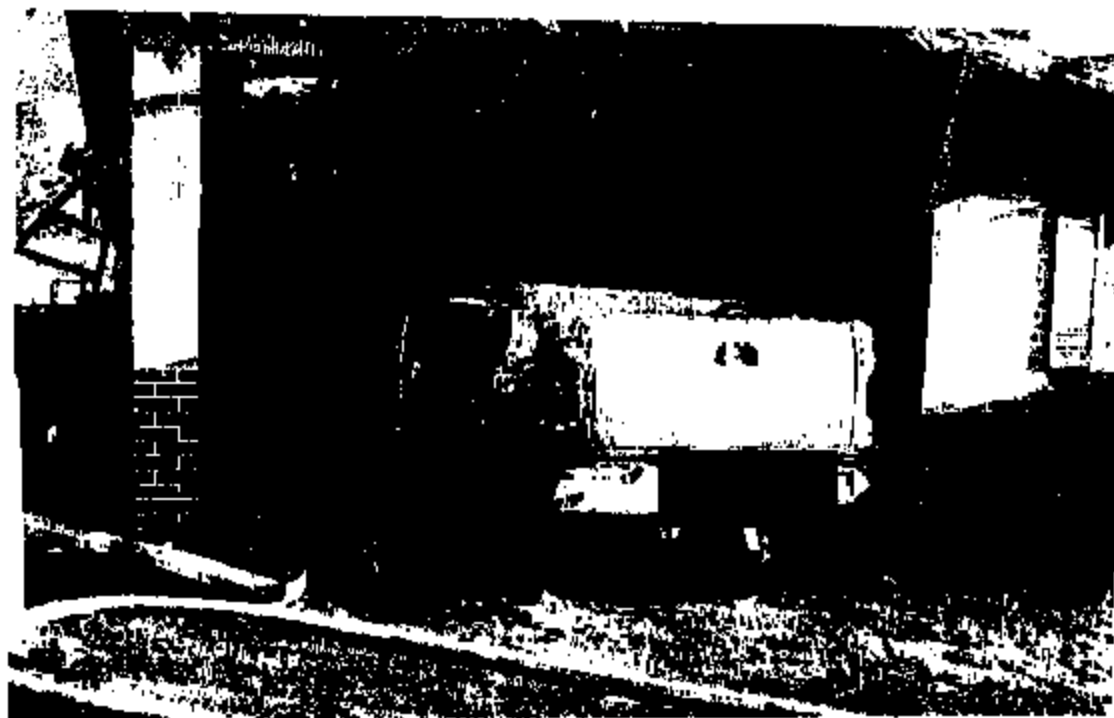


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# 11



# 12



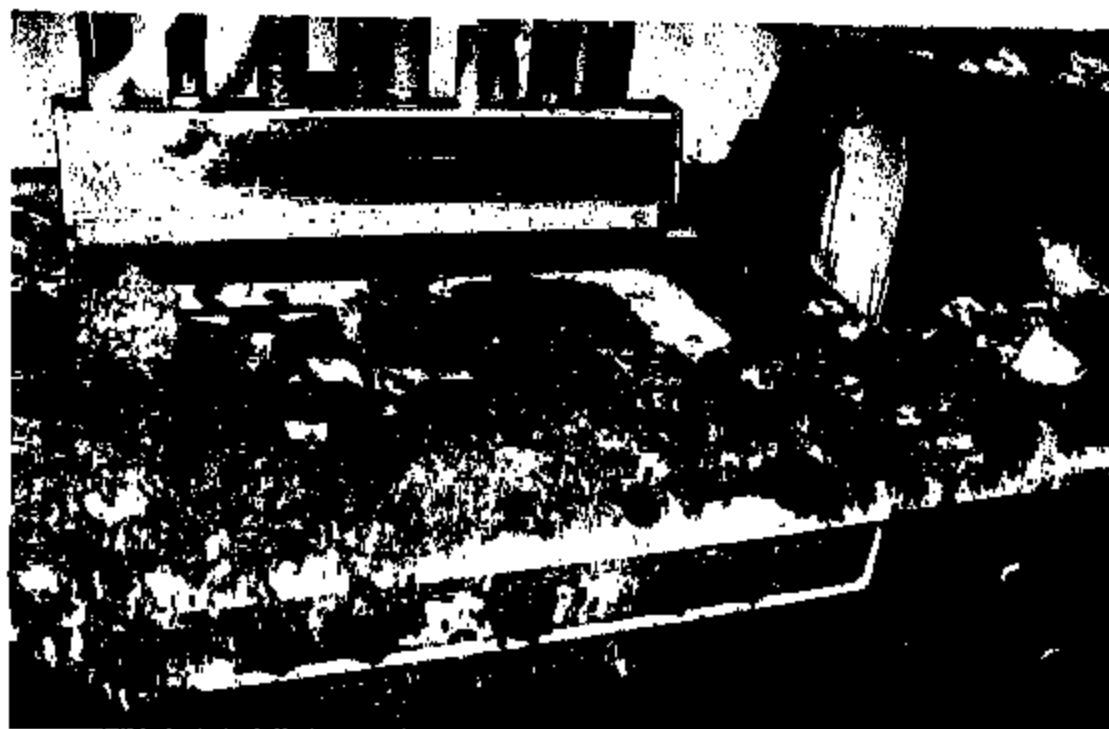
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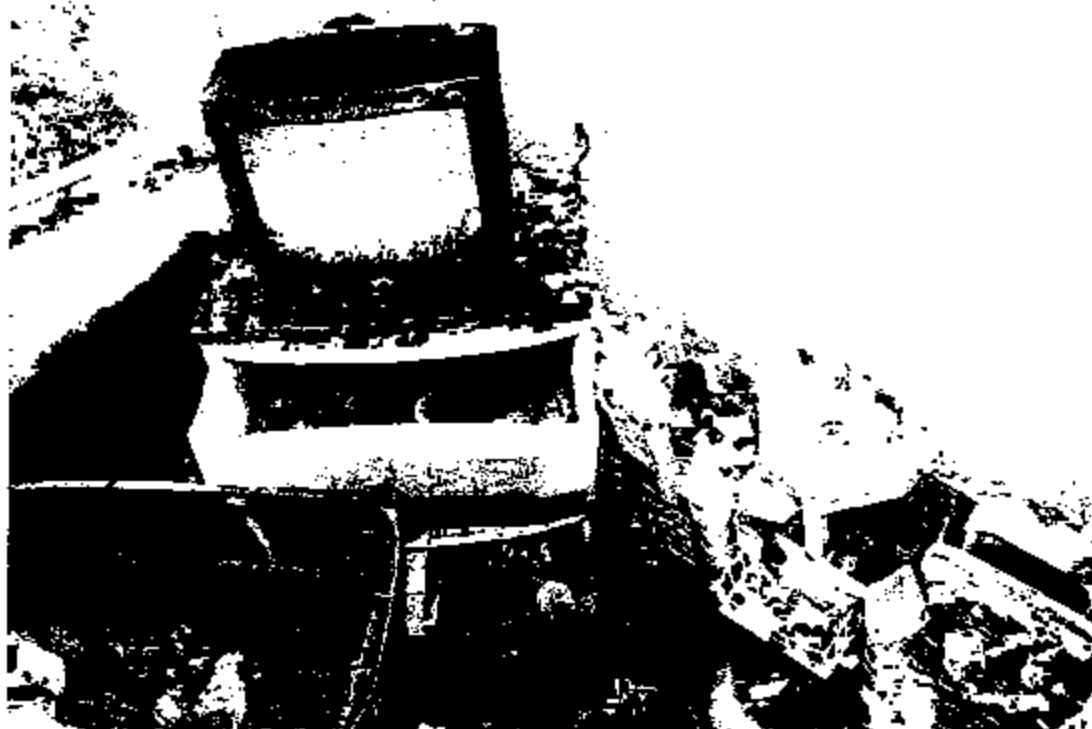
#14



#15



#16



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#18

#19



ER05-005-LC-7738



#26



#21



#22

EA05-005-LC-7738



#23





# 24



# 25

## GREG ROBERSON CONSTRUCTION COMPANY

1218 Collard Valley Road  
Cadartown, Georgia 30125  
(770) 748-7619 • Pager (770) 768-3139

PROPOSAL SUBMITTED TO	PHONE	DATE
STREET	JOB NAME	2-9-05
CITY, STATE AND ZIP CODE	JOB LOCATION	
ARCHITECT	DATE OF PLANS	JOB PHONE

We hereby submit specifications and estimates for:

Materials & Labor To Replace Driveway on  
Jub Peak ave.

\$ 136,640.00

We propose hereby to furnish material and labor - complete in accordance with above specifications, the sum of:

One hundred thirty six thousand six hundred forty dollars (\$ 136,640.00).

Payment to be made as follows:

*Greg Roberson*  
Authorized Signature

Note: This proposal may be withdrawn by us if not accepted within 30 days.

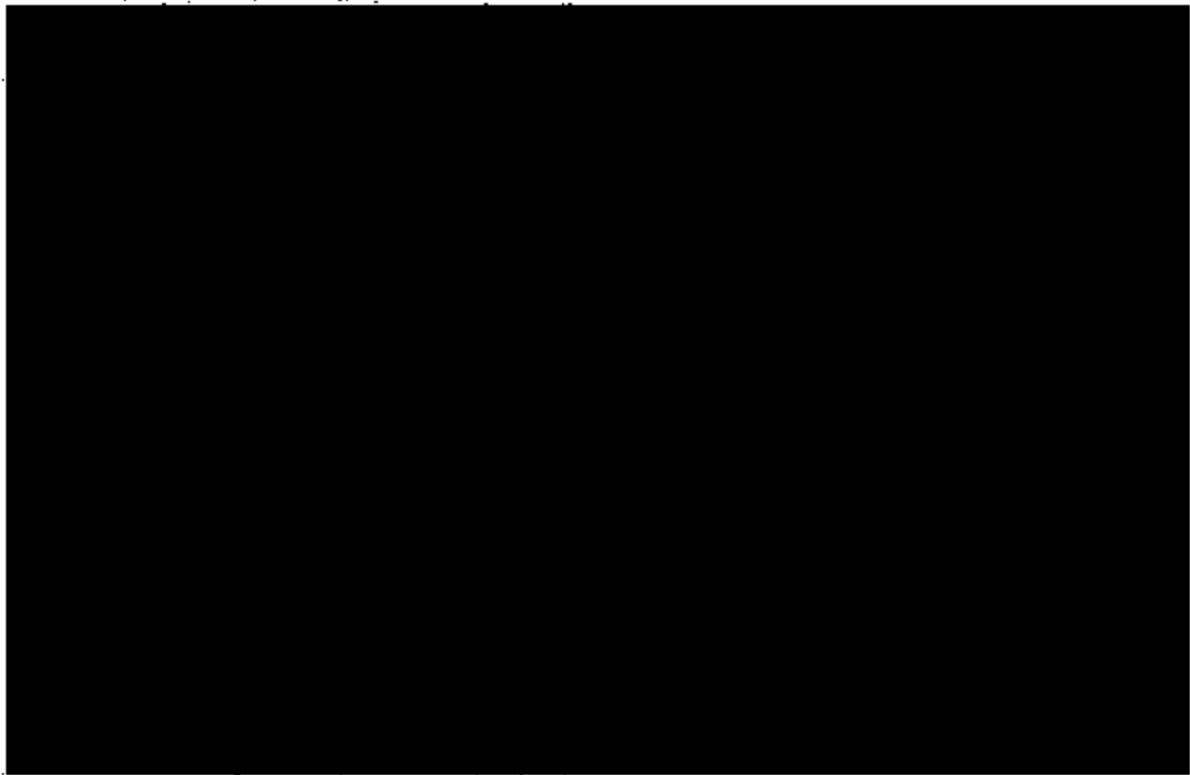
**Acceptance of Proposal** - The above prices, specifications and conditions are satisfactory and are hereby accepted. You are authorized to do the work as specified. Payment will be made as outlined above.

Date of Acceptance

Signature \_\_\_\_\_  
Signature \_\_\_\_\_

ENG-005-LC-7741





00CI06525

AOC-105 Summons Type: CI  
Rev. 6-99Commonwealth of Kentucky  
Court of Justice

CR 4.02: CR Official Form 1



CIVIL SUMMONS

Case No. \_\_\_\_\_

Court Circuit

County Jefferson

Progressive Ins Co

OFFICE OF THE SECRETARY  
JOHN W. BROWNJEFFERSON CIRCUIT COURT  
DIVISION TWO (2)Bord Motor Company  
The American Road #611  
Dearborn MI 48121-1899TO OCT 16 P2:07  
CM PLAINTIFF

VS.

RECEIVED

OCT 10 2000

SECRETARY OF STATE  
COMMONWEALTH OF KY

DEFENDANT

SERVE: Kentucky Secretary of State

Serve: CT Corporation System  
Kentucky Home Life Building  
Louisville KY 40202

THE COMMONWEALTH OF KENTUCKY  
TO THE ABOVE-NAMED DEFENDANTS:

You are hereby notified that a legal action has been filed against you in this court demanding relief as shown on the document delivered to you with this summons. Unless a written defense is made by you or by an attorney on your behalf and filed in the clerk's office within 20 days following the day this paper is delivered to you, judgment by default may be taken against you for the relief demanded in the attached complaint.

The name(s) and address(es) of the party or parties demanding such relief against you or his (their) attorney(s) are shown on the document delivered to you with this summons.

Date: \_\_\_\_\_

OCT - 6 2000

Clerk: \_\_\_\_\_

By: \_\_\_\_\_ D.C.

## PROOF OF SERVICE

This summons was served by delivering a true copy and the complaint (or other initiating document)

This \_\_\_\_\_ day of \_\_\_\_\_

Served By: \_\_\_\_\_

AOC-105 Summons Type: CI  
Rev. 6-99

Commonwealth of Kentucky  
Court of Justice

CR 4.02: CR Official Form 1



CIVIL SUMMONS

Case No. **00CI06525**

Court Circuit

County Jefferson

Progressive Ins Co

PLAINTIFF

JEFFERSON CIRCUIT COURT  
DIVISION TWO (2)

VS.

Ford Motor Company  
The American Road #611  
Dearborn MI 48121-1899

DEFENDANT

SERVE: Kentucky Secretary of State

Serve: GT Corporation System  
Kentucky Home Life Building  
Louisville KY 40202

THE COMMONWEALTH OF KENTUCKY  
TO THE ABOVE-NAMED DEFENDANTS:

You are hereby notified that a legal action has been filed against you in this court demanding relief as shown on the document delivered to you with this summons. Unless a written defense is made by you or by an attorney on your behalf and filed in the clerk's office within 20 days following the day this paper is delivered to you, judgment by default may be taken against you for the relief demanded in the attached complaint.

The name(s) and address(es) of the party or parties demanding such relief against you or his (their) attorney(s) are shown on the document delivered to you with this summons.

Date: Ty Miller  
OCT - 6 2000

Clerk: Ty Miller

By: WKB D.C.

PROOF OF SERVICE

This summons was served by delivering a true copy and the complaint (or other initiating document) to:

This \_\_\_\_\_ day of \_\_\_\_\_

Served By: \_\_\_\_\_

COPY

CIVIL ACTION NO. 00CI-06525

JEFFERSON CIRCUIT COURT  
DIVISION \_\_\_\_\_ ( )

[REDACTED]  
Richmond Heights, OH

PLAINTIFF

vs.

COMPLAINT

JEFFERSON CIRCUIT COURT  
DIVISION TWO (2)

TOWN AND COUNTRY FORD, INC.  
6015 Preston Highway  
Louisville, KY 40219-1393

SERVE:

[REDACTED]  
Louisville, KY

COPY  
ATTEST: TONY MILLER, CLERK  
JEFFERSON CIRCUIT COURT  
LOUISVILLE, KENTUCKY

BY

D.G.

DEFENDANTS

-and-

FORD MOTOR COMPANY  
The American Road #611  
Dearborn, MI 48121-1899

SERVE: Kentucky Secretary of State

AGENT: CT Corporation System  
Kentucky Home Life Building  
Louisville, KY 40202

\*\*\*\*\*

Comes Plaintiff [REDACTED] (hereinafter "Progressive"), by counsel,  
and, for its Complaint and claim for relief against Defendants, Town and Country Ford, Inc.  
(hereinafter "Town and Country") and Ford Motor Company (hereinafter "Ford"), respectfully  
states as follows:

1. Progressive is a foreign corporation engaged in the business of motor vehicle  
insurance and, at all times relevant to these proceedings, was and is duly authorized to do  
business in the Commonwealth of Kentucky.

2. Town and Country is a Kentucky corporation engaged in the business of motor vehicle sales and repair in Louisville, Jefferson County, Kentucky and, at all times relevant to these proceedings, was and is duly authorized to do business in the Commonwealth of Kentucky.

3. Ford is a foreign corporation engaged in the business of motor vehicle manufacturing and sales and, at all times relevant to these proceedings, was and is duly authorized to do business in the Commonwealth of Kentucky.

4. In 1998, Ford manufactured a 1998 Ford Ranger pickup truck with the specific Vehicle Identification Number 1FTYR10C0WL [REDACTED] hereinafter "the subject vehicle") and delivered same to Town and Country to be offered for sale or lease to the public. The subject vehicle was placed into the stream of commerce by Ford with certain express and/or implied warranties of merchantability and/or fitness for its standard and contemplated use as a motor vehicle.

5. In 1998, Town and Country received the subject vehicle from Ford and offered same for sale or lease to the public.

6. In 1998, Town and Country leased and/or sold the subject vehicle to [REDACTED]. The subject vehicle was leased and/or sold to [REDACTED] by Town and Country with certain express and/or implied warranties of merchantability and/or fitness for its standard and contemplated use as a motor vehicle.

7. In 1998, on at least one occasion, [REDACTED] and/or his wife, [REDACTED] detected the odor of gasoline in the passenger cabin of the subject vehicle, reported the detection of said odor to agents and employees of Town and Country, and delivered the subject vehicle into the custody and control of Town and Country for diagnosis of the source of the out-of-the-ordinary gasoline odor and for repair of said condition.

8. Town and Country, by and through its agents and employees, negligently failed to diagnose the source of the reported gasoline odor and/or failed to repair said condition before returning the subject vehicle to the Freemans for their use.

9. On October 6, 1998, the subject vehicle caught fire while being operated by [REDACTED] and burned.

10. The fire was a direct and proximate result of Town and Country's negligent failure to diagnose the source of the gasoline odor in the subject vehicle; negligent repair of the subject vehicle; negligent failure to repair the subject vehicle; and/or breach of its express and/or implied warranties of merchantability and/or fitness for the subject vehicle's standard and contemplated use as a motor vehicle.

11. The fire was a direct and proximate result of Ford's negligent manufacture of the subject vehicle and/or breach of its express and/or implied warranties of merchantability and/or fitness for the subject vehicle's standard and contemplated use as a motor vehicle.

12. As a direct and proximate result of the fire and Defendants' negligence and/or breach of warranties, the subject vehicle leased and/or owned by [REDACTED] was damaged such that the difference in its fair market value immediately before and after said fire was and is the amount of \$12,508.00.

13. As a direct and proximate result of the fire and Defendants' negligence and/or breach of warranties, [REDACTED] incurred reasonable towing and rental charges in the amount of \$146.25.

14. As a direct and proximate result of the fire and Defendants' negligence and/or breach of warranties, [REDACTED] incurred reasonable and necessary medical expenses in the amount of \$25.00.



15. In consideration of a premium paid, Progressive issued to [REDACTED] a policy of insurance which, among other things, provided coverage for property damage to the subject vehicle, towing expense, rental reimbursement expense, and basic reparation benefits. Said policy of insurance was in full force and effect at the time of the fire which is the subject of this litigation.

16. Progressive was at all times relevant to these proceedings the basic reparation obligor of Mr. Freeman under KRS 304.39-170 of the Kentucky Motor Vehicle Reparations Act.

17. As a direct and proximate result of the fire and Defendants' negligence and/or breach of warranties, Progressive became obligated to and did pay property damage benefits, towing benefits, rental reimbursement benefits, and basic reparation benefits under the terms of its policy to and/or on behalf of [REDACTED] the total amount of \$12,179.25, representing [REDACTED] total damages less his deductible in the amount of \$500.00.

18. By reason of such payment of benefits, Progressive is subrogated to the rights and interests of [REDACTED] against Defendants to the extent of payments made to and/or on behalf of [REDACTED]

19. Pursuant to the terms of the Kentucky Motor Vehicle Reparation Act and the common law doctrines of subrogation, contribution, and indemnity, Defendants are jointly and severally liable for reimbursement, contribution, and indemnity to Progressive for those moneys by it paid to and/or on behalf of Mr. Freeman as a result of Defendants' negligence and/or breach of warranties.

*WHEREFORE*, Plaintiff, Progressive Insurance Company, respectfully demands as follows:

1. Judgment in favor of Plaintiff, [REDACTED], against Defendants, Town and Country Ford, Inc. and Ford Motor Company, jointly and severally, in the amount of \$12,179.25;

2. Post-judgment interest at the legal rate from the date of entry of either judgment, or both, until such judgment is paid in full;

3. All costs herein expended, including reasonable attorneys' fee;

4. A jury trial on all issues so triable; and

5. Any and all further orders and relief to which it may appear entitled.



Bradford P. Bollmann  
SCHILLER, OSBOURN & BARNES  
1100 Kentucky Home Life Building  
239 South Fifth Street  
Louisville, Kentucky 40202  
(502) 583-4777

Complaint.pdf



## ISSUE LIST

Last Handling Date/ Issue Status	Name/ Reason Desc	Vin/ Case No.	Model Year and Vehicle Line	Issue Type
8/1/2005 CLOSED	RICHARD GARDNER LEGAL - CUSTOMER WAITING FOR ACKNOWLEDGEMENT	1FTRX18L72N [REDACTED] 530481435	2002 F-SERIES	02
6/1/2005 CLOSED	RICHARD GARDNER LEGAL - CUSTOMER WAITING FOR ACKNOWLEDGEMENT	1FTRX18L72N [REDACTED] 530481435	2002 F-SERIES	02
6/23/2005 CLOSED	RICHARD GARDNER LEGAL - ACCIDENT / FIRE	1FTRX18L72N [REDACTED] 530481435	2002 F-SERIES	10

ER05-005-LC-7749

... 6/9/2005

## All Action Details for Issue

Print

VIN: 1FTRX18L72N	Year: 2002	Model: F-SERIES	Case: 530461435
Name: [REDACTED]	Owner Status: Subsequent	WSD: 2002-03-26	
Symptom Desc: FIRE/SMOKE VISIBLE FLAME UNDERHOOD		Primary Phone: [REDACTED]	
Reason Desc: LEGAL - CUSTOMER WAITING FOR ACKNOWLEDGEMENT		Secondary Phone: [REDACTED]	
Issue Type: 02 INFORMATION	Issue Status: CLOSED		

Action: CB-IT MAY TAKE UP TO 60 DAYS FOR OGC TO BEGIN AN INVESTIGATION	Origin Desc: US CONCERN CASE BASE
Dealer: 01248 WINNER FORD	
Odometer: 50000 MI	Comm Type: PHONE
Analyst Name: GOMES AMANDA	Analyst: AGOMES35
Action Date: 08/07/2005	Action Time: 13.51.41.476
	Action Date: No

## Caller Information if Different From Vehicle Owner:

First Name	Middle Initial	Last Name	Day Phone	Relationship
ANNE MARIE		GARDNER	8563718730	SPOUSE

Comments: CUSTOMER SAID: \*\*\*ATTENTION SAME ISSUE AS 05/23/2005\*\*\*-I HAVE A CLAIM WITH FORD ALREADY ABOUT THE ISSUE -I RECEIVED A LETTER STATING THE OFFICE OF GENERAL COUNSEL WAS MADE AWARE OF MY CLAIM -A REPORT WAS FILED WITH THE FIRE DEPARTMENT -A POLICE REPORT WAS NOT FILED -WE FILED A CLAIM WITH MY INSURANCE COMPANY -THE WHOLE FRONT OF MY HOME IS DAMAGE -IF I CONTINUE WITH MY CLAIM WITH MY HOME INSURANCE THE PREMIUM RATES WILL INCREASE -I DONT WANT TO GO THROUGH MY INSURANCE COMPANY -WE NEVER RECEIVED ANY RECALLS FOR THE VEHDEALER SAID: -NONECRC ADVISED: THE OFFICE OF GENERAL COUNSEL WILL CREATE A FILE FOR AN INVESTIGATION WHEN THEY RECEIVE YOUR WRITTEN RESPONSE. IF YOU WOULD LIKE TO PURSUE THIS CLAIM, YOU MUST SUBMIT YOUR RESPONSE TO THE LETTER YOU RECEIVED FROM OGC. ONCE THEY RECEIVE THE INFORMATION, OGC WILL THEN CONDUCT THEIR INVESTIGATION WHICH COULD TAKE SOME TIME. IF YOU HAVE ANY FUTURE QUESTIONS AFTER YOU MAIL THE INFORMATION, PLEASE CORRESPOND WITH THE REPRESENTATIVE WHO CONDUCTS THE INVESTIGATION.

E905-003-LC-7750

## All Action Details for Issue

Print

VIN: 1FTRX18L72N	Year: 2002	Model: F-SERIES	Case: 530481435
Name: [REDACTED]	Owner Status: Subsequent	WSD: 2002-03-28	
Symptom Desc: FIRE/SMOKE SCORCHED/BURNT		Primary Phone: [REDACTED]	
Reason Desc: LEGAL - CUSTOMER WAITING FOR ACKNOWLEDGEMENT		Secondary Phone: [REDACTED]	
Issue Type: 02 INFORMATION	Issue Status: CLOSED		

Action: CB-ADVISE CUST WE WILL NOTIFY THE DEPT SOMEBODY WILL BE IN TOUCH	
Dealer: 01248 WINNER FORD	Origin Desc: US CONCERN CASE BASE
Odometer: 1 MI	Comm Type: PHONE
Analyst Name: NARAYAN PRABHA	Analyst: PNARAYA4
Action Date: 06/01/2005	Action Time: 14:18:27.275
	Action Data: No

## Caller Information if Different From Vehicle Owner:

First Name	Middle Initial	Last Name	Day Phone	Relationship
MRS		GARDNER		SPOUSE

Comments CUSTOMER SAID: \*\*\* ATTN : SAME ISSUE AS IN HISTORICAL \*\* - VEH BURNT & CAUSED DAMAGE TO THE HOUSE- NO PERSONAL INJURIES TO REPORT- STILL AWAITING A RESPONSE FROM THE LEGAL DEPT. DEALER SAID: - WINNER FORD 250 HADDONFIELD-BERLIN ROAD CHERRY HILL, NJ 08034 TEL: (856) 428-4000. CRC ADVISED: THANK YOU FOR PROVIDING US WITH THIS INFORMATION IN RELATION TO YOUR CASE. I WILL FORWARD THIS TO OUR CONSUMER AFFAIRS DEPARTMENT, AND I HAVE REQUESTED THAT THEY CONTACT YOU WITHIN TWO BUSINESS DAYS.

E003-003-LO-7751

6/9/2005

## All Action Details for Issue

Print

---

VIN: 1FTRX18L72N	Year: 2002	Model: F-SERIES	Case: 530481435
Name:	Owner Status: Subsequent	WSD: 2002-03-26	
Symptom Desc: FIRE/SMOKE SCORCHED/BURNT		Primary Phone:	
Reason Desc: LEGAL - ACCIDENT / FIRE		Secondary Phone:	
Issue Type: 10 OGC	Issue Status: CLOSED		

---

Actions: CONTACT ADVANCED TO OGC  
Dealer: 01248 WINNER FORD  
Odometer: 50000 MI  
Analyst Name: BRAVEBOY PITTUN  
Action Date: 05/23/2005

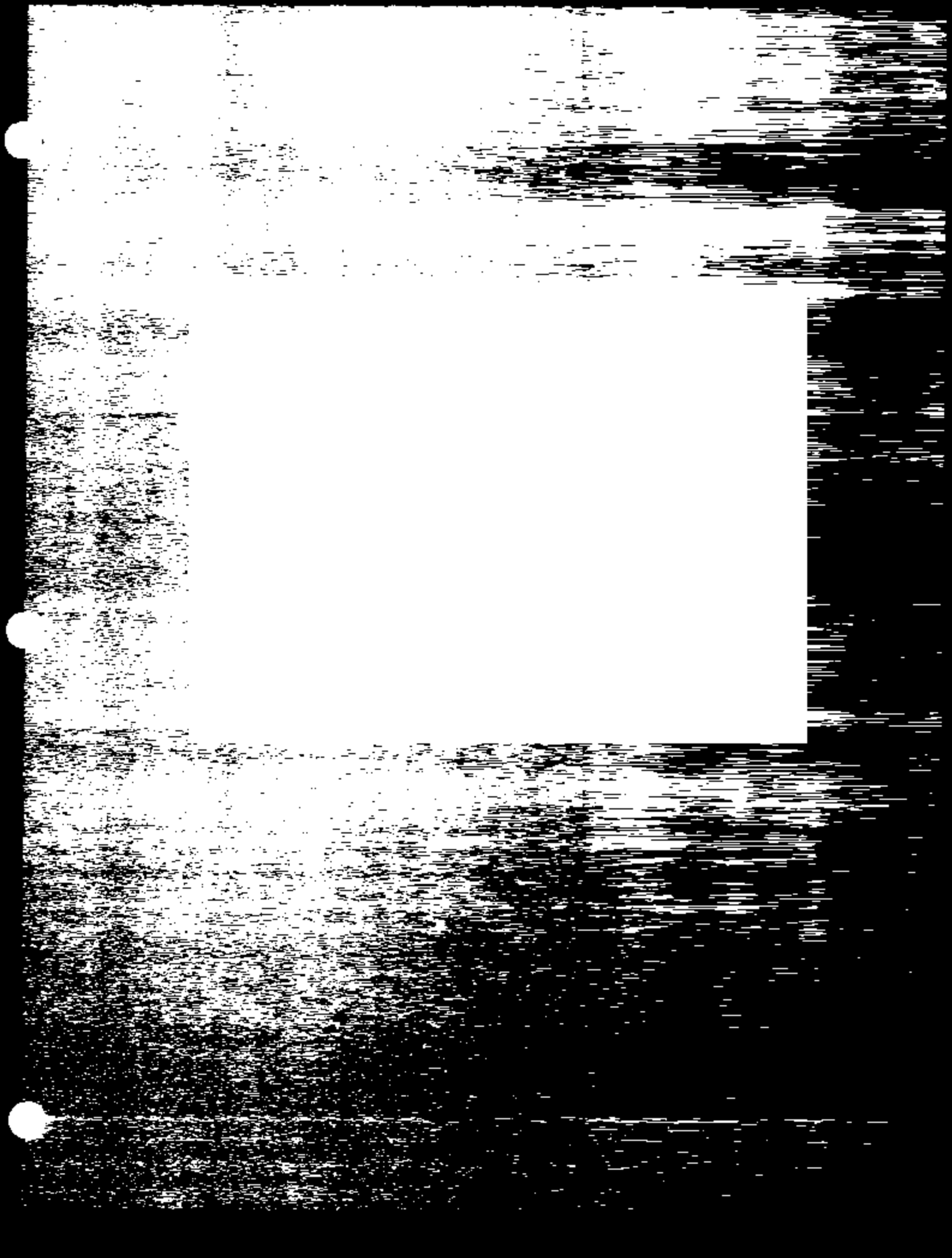
Comm Type: PHONE  
Analyst: PBRAVEB1  
Action Time: 14.44.06.220

Origin Desc: LS CONCERN CASE BASE  
  
Action Date: No

Comments: CUSTOMER SAID: -CUST SAYS THAT THE F-150 CAUGHT ON FIRE IN THE DRIVE WAY-CUST WANTS TO KNOW IF FORD HAS REPORTED THIS-CUST SAYS THAT THE FRONT OF HER HOUSE WAS BURNT-CUST SAYS THAT THEIR INSURANCE WILL GO UP IF THEY REPORT IT-CUST WANTS TO KNOW WHAT FORD'S LEGAL DEPT IS GOING TO DO-CUT SAYS THAT THE VEH WAS TOWED FROM THEIR HOUSE DEALER SAID: WINNER FORD 250 HADDONFIELD-BERLIN ROAD CHERRY HILL, NJ 08034 DISTANCE: 9.90 MILES TEL: (856) 428-4000 CRC ADVISED: I WILL FORWARD THIS INFORMATION TO THE FORD OGC DEPARTMENT. YOU WILL BE CONTACTED WITHIN 3-5 BUSINESS DAYS.

---

ER05-003-LC-7752





**Photo 1 from Estimate for Claim no [REDACTED]**

Photo date: 13/08/2004 09:30:21:00. Size: 47065

Description:

Insured: [REDACTED]. Policy\_no: [REDACTED]

Claimant: MICHAEL GIACCIO.

Vehicle: 97, FORD, F150 4X4. VIN: 1FTDF18W9VN [REDACTED]

Loss date: 08/12/04. Estimator: DANNY ALLISON



**Photo 2 from Estimate for Claim no [REDACTED]**

Photo date: 13/08/2004 09:30:21:00. Size: 46542

Description:

Insured: [REDACTED]. Policy\_no: [REDACTED]

EN05-005-LC-7754

Claimant: [REDACTED]

Vehicle: 97, FORD, F150 4X4, VIN: 1ETDE18W9VN [REDACTED]

Loss date: 08/12/04. Estimator: [REDACTED]

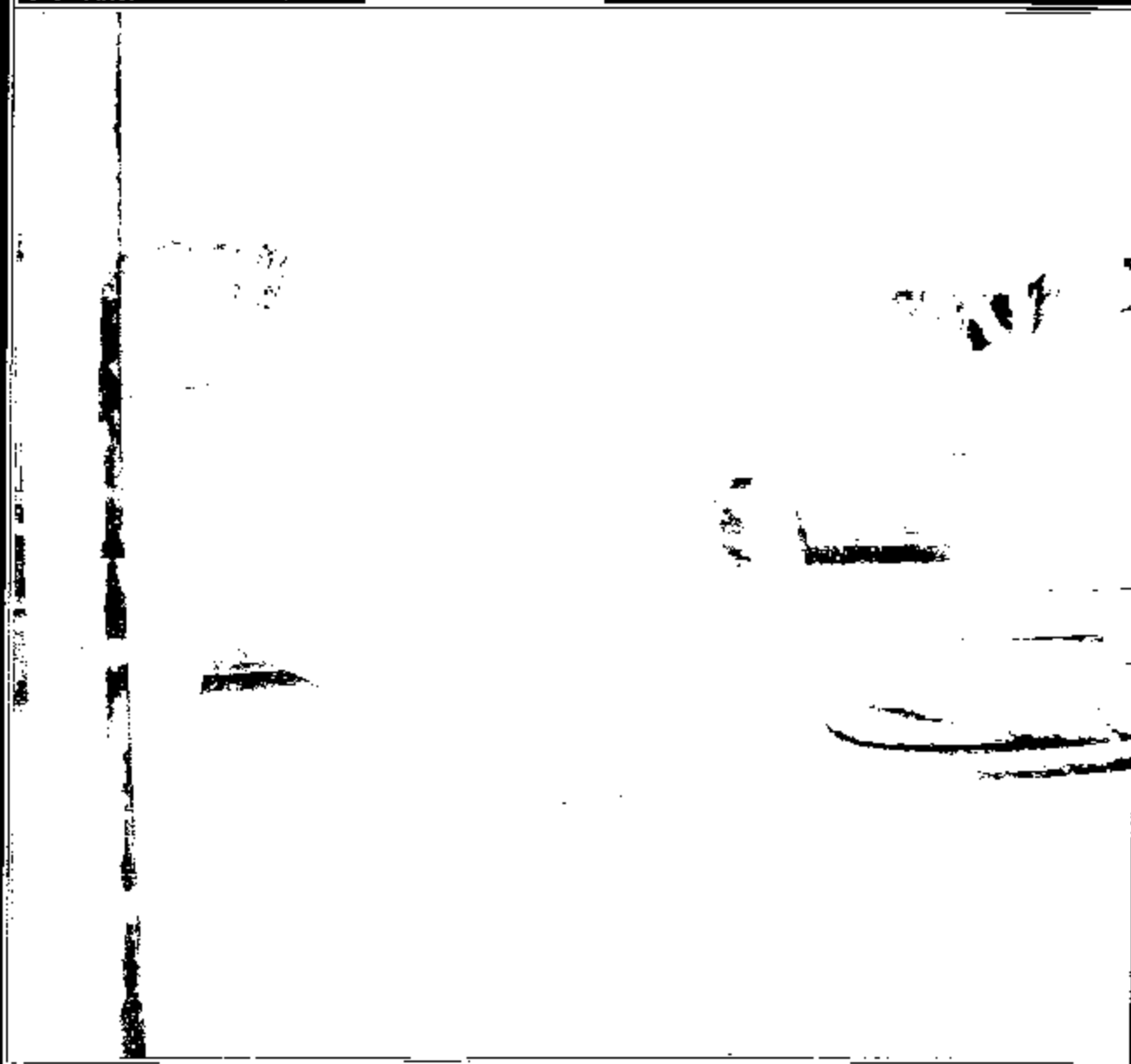


Photo 3 from Estimate for Claim no [REDACTED]

Photo date: 13/08/2004 09:30:22:00. Size: 31397

Description:

Insured: [REDACTED] Policy no: [REDACTED]

Claimant: [REDACTED]

Vehicle: 97, FORD, F150 4X4, VIN: 1ETDE18W9VN [REDACTED]

Loss date: 08/12/04. Estimator: [REDACTED]

ENBS-005-LC-7785



Photo 4 from Estimate for Claim no [REDACTED]

Photo date: 13/08/2004 09:30:22:00, Size: 29338

Description:

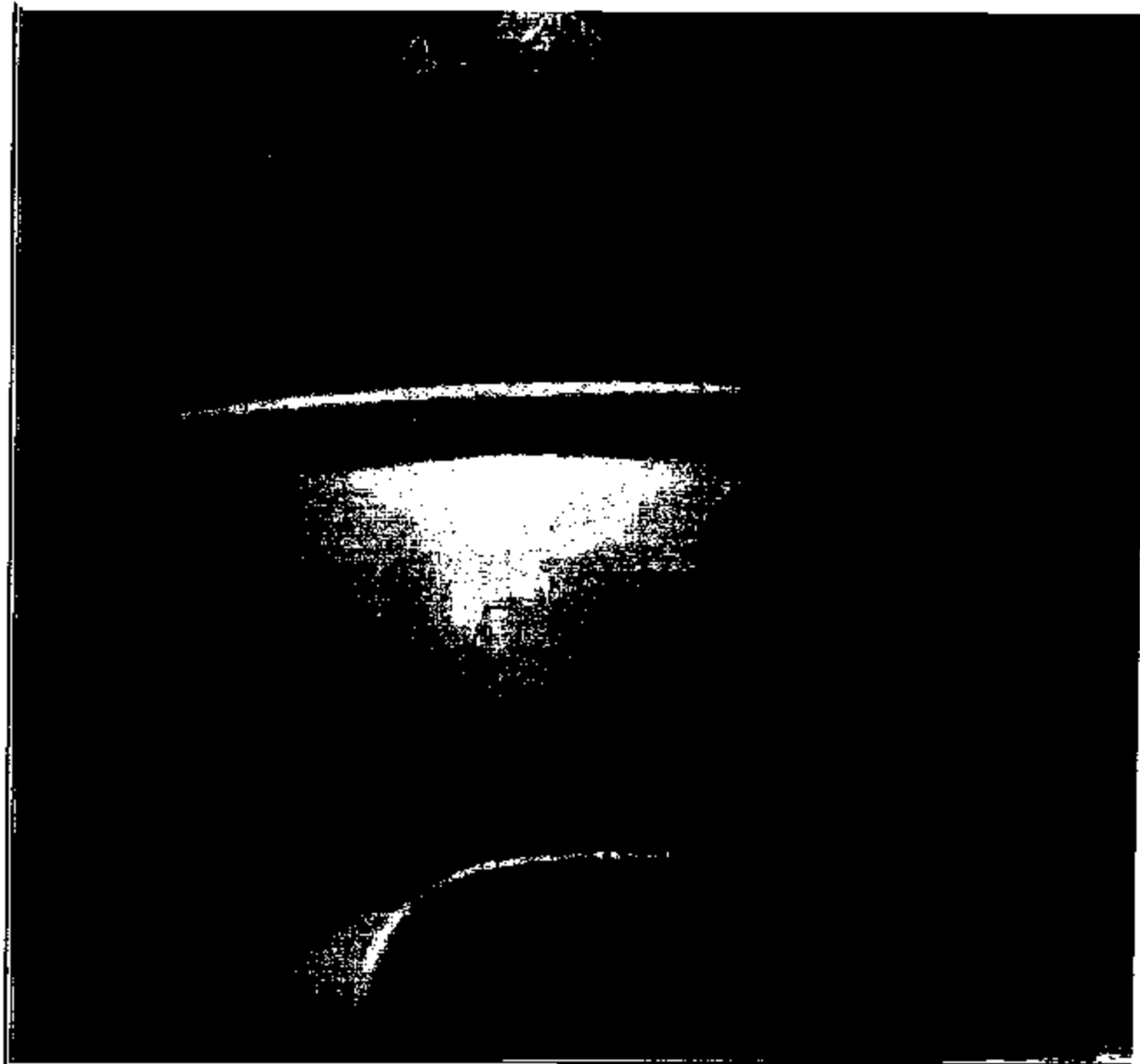
Insured: [REDACTED] Policy\_no: [REDACTED]

Claimant: [REDACTED]

Vehicle: 97, FORD, F150 4X4. VIN: 1FTDE13W9YA [REDACTED]

Loss date: 08/12/04. Estimator: [REDACTED]

ENR25-000-LO-7756



**Photo 5 from Estimate for Claim no 0117549400101073-01**

**Photo date:** 13/08/2004 09:32:42:00. **Size:** 45077

**Description:**

**Insured:** GIACCIO, MICHAEL. **Policy\_no:** 0156417107.

**Claimant:** MICHAEL GIACCIO.

**Vehicle:** 97, FORD, F150 4X4. **VIN:** 1FTDF18W9VNC09844.

**Loss date:** 08/12/04. **Estimator:** DANNY ALLISON

EN03-003-LC-7751



Photo 6 from Estimate for Claim no [REDACTED]

Photo date: 13/08/2004 09:32:43:00. Size: 56232

Description:

Insured: [REDACTED] Policy no: [REDACTED]

Claimant: [REDACTED]

Vehicle: 97, FORD, F150 4X4. VIN: 1ETDE18W9V [REDACTED]

Loss date: 08/12/04. Estimator [REDACTED]

ENR-003-LC-7756

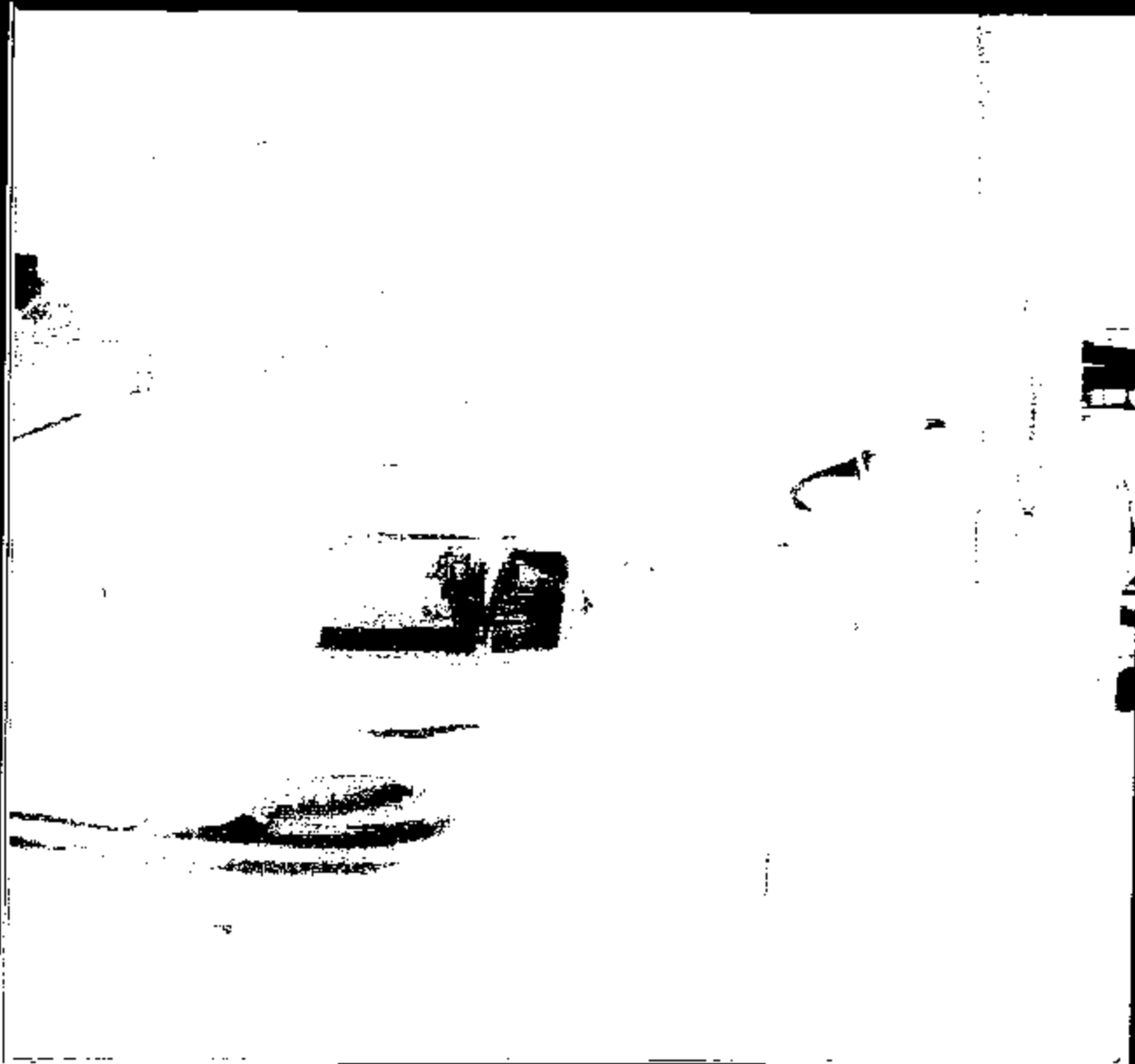


Photo 7 from Estimate for Claim no [REDACTED]

Photo date: 13/08/2004 09:32:43:00. Size: 57550

Description:

Insured: [REDACTED] Policy no: [REDACTED]

Claimant:

Vehicle: 97, FORD, F150 4X4. VIN: 1FTDF18W9VN [REDACTED]

Loss date: 08/12/04. Estimator: [REDACTED]

EP03-003-LC-7753



Photo 8 from Estimate for Claim no [REDACTED]

Photo date: 13/08/2004 09:32:43:00. Size: 55999

Description:

Insured: [REDACTED] Policy no: [REDACTED]

Claimant:

Vehicle: 97, FORD, F150 4X4. VIN: 1FTDF18W9VN [REDACTED]

Loss date: 08/12/04. Estimator: [REDACTED]

EP03-003-LC-7760

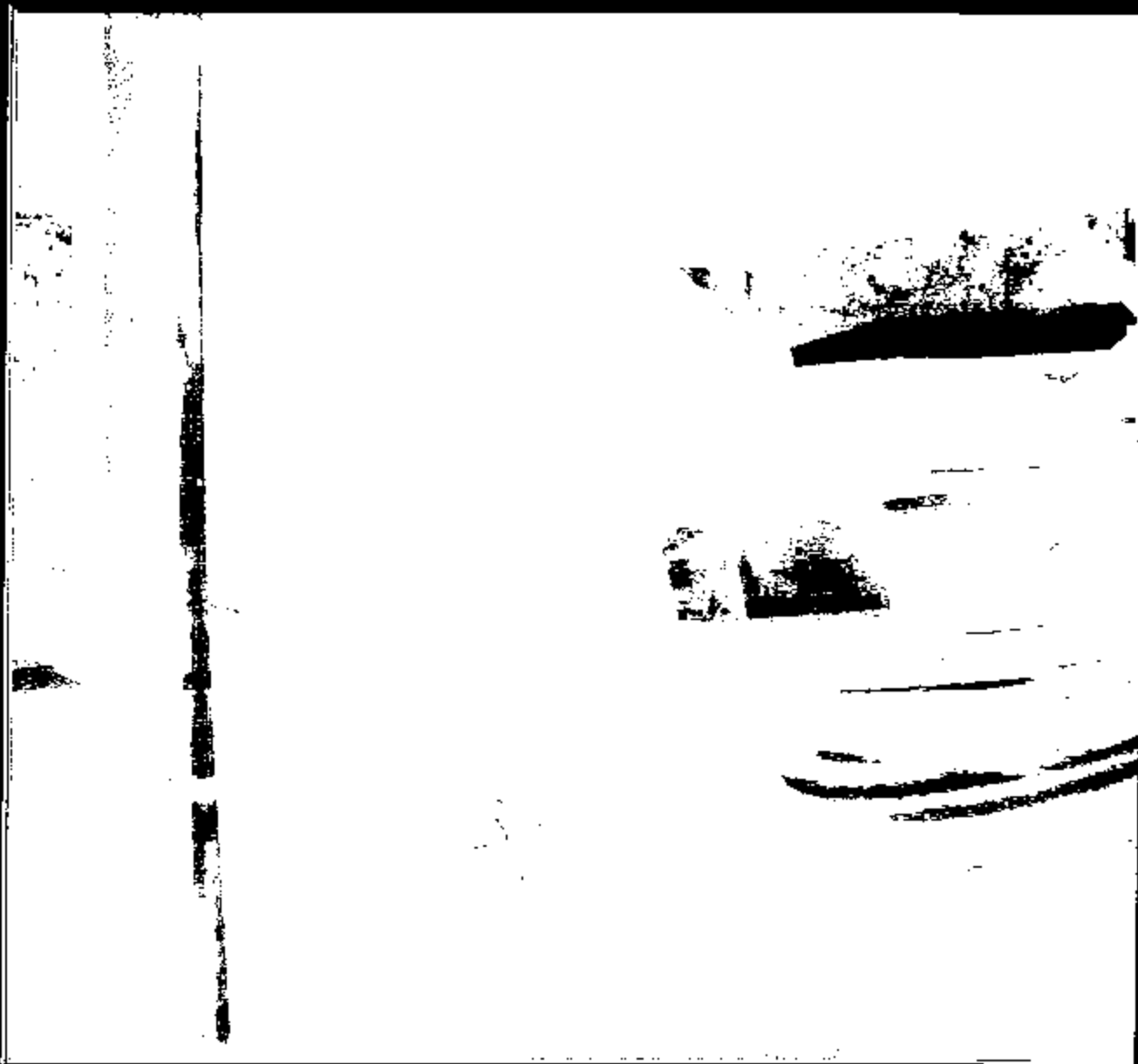


Photo 9 from Estimate for Claim no [REDACTED]

Photo date: 13/08/2004 09:32:43:00. Size: 37025

Description:

Insured: [REDACTED] Policy no [REDACTED]

Claimant:

Vehicle: 97, FORD, F150 4X4. VIN: 1FTDF18W9VN [REDACTED]

Loss date: 08/12/04. Estimator: [REDACTED]

ERB-000-LC-7781



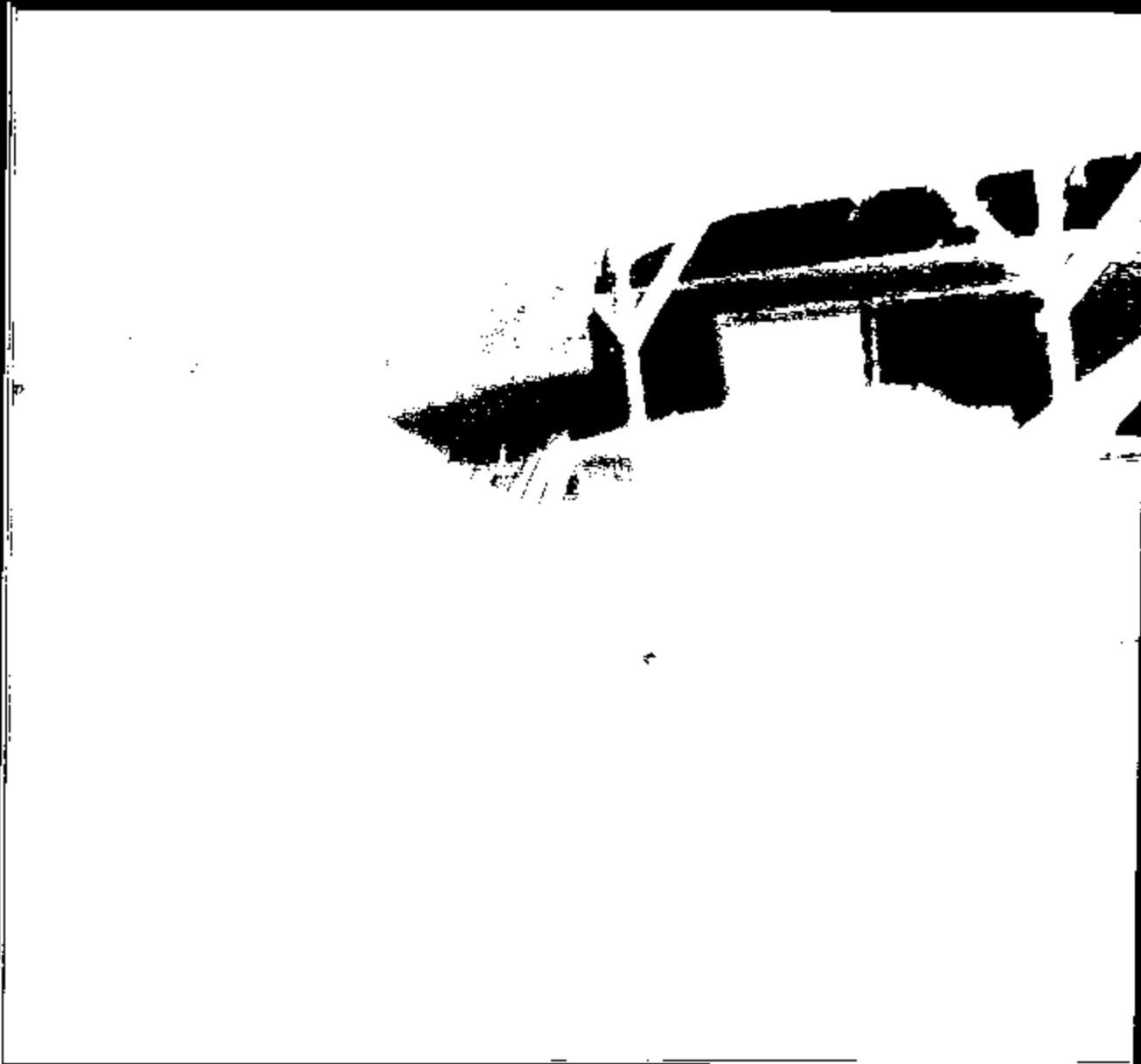


Photo 10 from Estimate for Claim no [REDACTED]

Photo date: 13/08/2004 09:32:43:00. Size: 35276

Description:

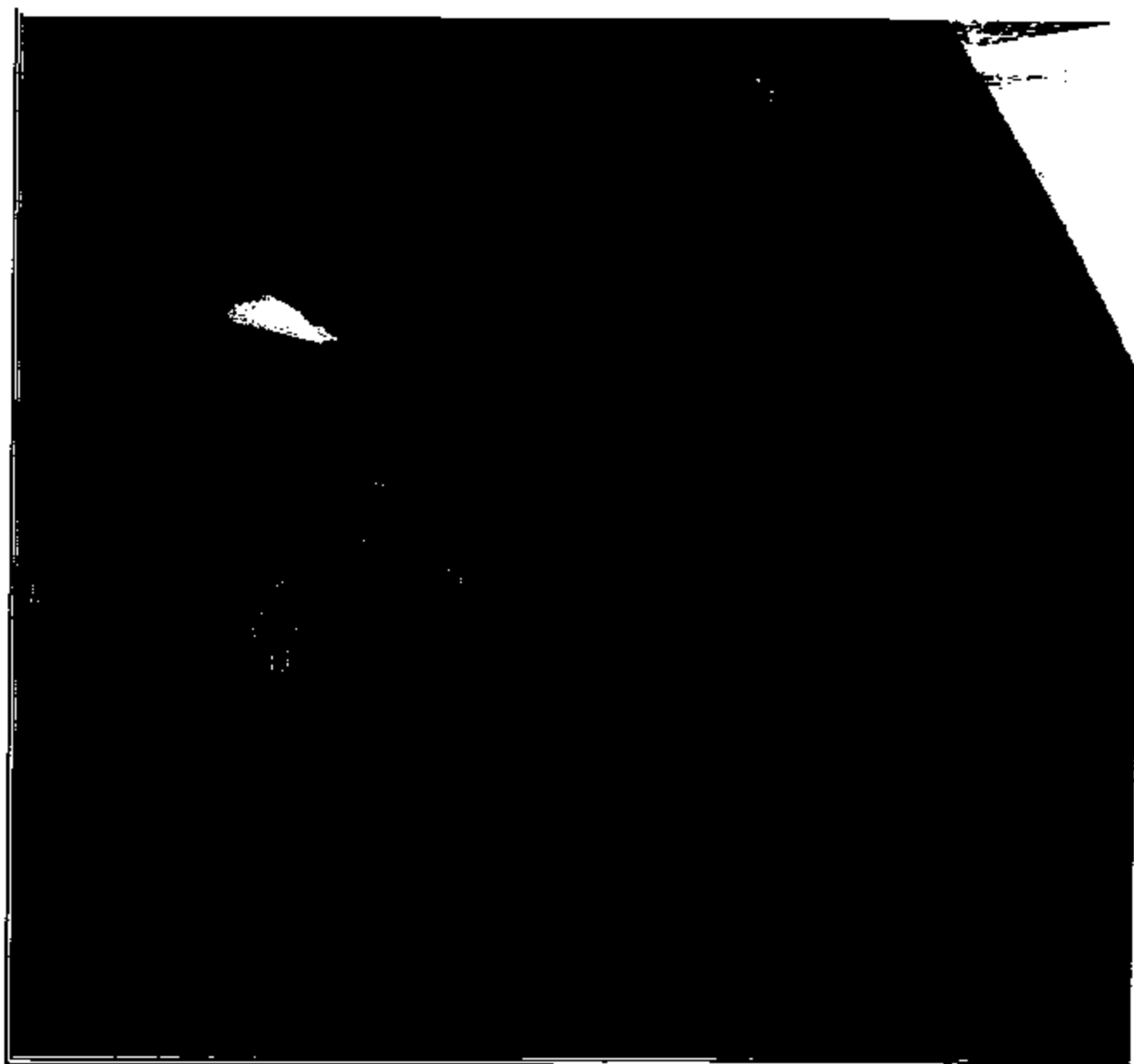
Insured: [REDACTED] Policy\_no: [REDACTED]

Claimant: [REDACTED]

Vehicle: 97, FORD, F150 4X4. VIN: 1FTDF18W9VT [REDACTED]

Loss date: 08/12/04. Estimator [REDACTED]

ERB-005-10-7702



ERB-003-LC-7763

## ISSUE LIST

Last Handling Date/ Issue Status	Name/ Reason Desc	Vin/ Case No.	Model Year and Vehicle Line	Issue Type
8/17/2004 CLOSED	MICHAEL GIACCIO LEGAL - INSURANCE COMPANY SETTLEMENT	1FTDF18W9V[REDACTED] 457241682	1997 F-SERIES	02
6/17/2002 CLOSED	MICHAEL GIACCIO AWA - AWA DENIED	1FTDF18W9V[REDACTED] 457241682	1997 F-SERIES	02

E005-003-10-7764

## All Action Details for Issue

Print

VIN: 1FTDF18W9VN	Year: 1997	Model: F-SERIES	Case: 457241682
Name:	Owner Status: Subsequent	WSD: 1997-04-21	
Symptoms Desc: FIRE/SMOKE VISIBLE FLAME UNDERHOOD		Primary Phone:	
Reason Desc: LEGAL - INSURANCE COMPANY SETTLEMENT		Secondary Phone:	
Issue Type: 02 INFORMATION	Issue Status: CLOSED		

Action: ADVISE CUSTOMER TO CONTACT THEIR INSURANCE COMPANY FOR ASSISTANCE

Dealer:

Origin Desc: US CONCERN CASE BASE

Odometer: 190000 MI

Comm Type: PHONE

Analyst Name: DIXON, ANSON

Analyst: ADIXON28

Action Date: 08/17/2004

Action Time: 15:17:48.853

Action Data: No

Comments CUSTOMER SAID: - CUST ALLEGES 06/12/04 IN THE PM VEH CAUGHT FIRE AND BURNED UP - VEH WAS PARKED AND OFF FOR 8 HOURS - VEH WAS TOWED BY THE INSURANCE CARRIER TODAY 08/17/04- MARION COUNTY FIRE DEPARTMENT; FIRE REPORT NUMBER NOT PROVIDED YET - FIRE DEPARTMENT WAS UNABLE TO DETERMINE THE CAUSE OF ALLEGED FIRE- FIRE SEEMED TO ORIGINATE FROM THE ENGINE COMPARTMENT - CLAIMS HE ALWAYS HAD AN ONGOING SMELL OF GAS FROM THE VEH - INSURANCE CO. HAS SETTLED THE CLAIM BUT HE IS NOT SATISFIED WITH CLAIM RESOLUTION - VEH HAS BEEN TOTALLED - CUST ALLEGES THE FIRE STARTED DUE TO THE FUEL LINE RECALL FOR THE VEH - FEELS THE DLR SHOULD HAVE CAUGHT THE RECALL ISSUE DEALER SAID: NONE - BEAU WILLIAMS FORDCRC ADVISED: - YOUR INSURANCE COMPANY HAS THE RIGHT TO PURSUE CLAIMS FOR REIMBURSEMENT AGAINST FORD. FORD IS UNABLE TO INVESTIGATE THE VEHICLE AS REPAIRS HAVE BEEN PERFORMED.

E003-003-LC-7785

## All Action Details for Issue

Print

VIN: 1FTDF16WEV	Year: 1997	Model: F-SERIES	Case: 457241682
Name:	Owner Status: Subsequent	WSD: 1997-04-21	
Symptom Desc: CLIMATE CONTROL VISIBLE LEAKS COOLANT		Primary Phone:	
Reason Desc: AWA - AWA DENIED		Secondary Phone:	
Issue Type: 02 INFORMATION	Issue Status: CLOSED		

Action: ADVISE CUST VEHICLE IS BEYOND WARRANTY; NO ASSISTANCE

Dealer:

Origin Desc: US CONCERN CASE BASE

Odometer: 120000 MI

Comm Type: PHONE

Analyst Name: JULLIAN TAYLOR

Analyst: JTAYLOR

Action Date: 08/17/2002

Action Time: 12.40.25.452

Action Data: No

Comments CUSTOMER SAYS: -THE OTHER DLH SMELLED COOLANT -KEPT LOOSING WATER -CHECK RAD AND HOSES AND IT WAS GOOD -THE NEXT DAY RESOVICOUR WAS EMPTY -THERE IS A PIN HOLE ON TOP OF THE HEAD -THE LEAK DOES NOT HAPPEND WHEN THE VEH IS MOVING IT ONLY LEAKS WHEN IT IS STANDING -I COVERED THE HOLE -TODAY THERE IS A NEW PIN HOLE PER CUSTOMER, DEALER SAYS: -NONE CAC ADVISED: - I HAVE REVIEWED YOUR SITUATION AND UNFORTUNATELY THERE ARE NO WARRANTIES OR PROGRAMS ON YOUR VEHICLE THAT MIGHT PROVIDE COVERAGE FOR YOUR CONCERN. WHILE WE WOULD NOT BE ABLE TO PROVIDE YOU WITH ANY FINANCIAL ASSISTANCE, I WOULD ADVISE YOU TO HAVE YOUR VEHICLE INSPECTED AT A CERTIFIED F/L/M DEALERSHIP AS THEIR TECHNICIANS SPECIALIZE IN THE REPAIR AND CARE OF F/L/M VEHICLES INFERENCE CASE ID: 5616

E905-005-1C-7700





**Nationwide<sup>®</sup>**  
**On Your Side<sup>™</sup>**

2005

NE

Nationwide Insurance • 110 Elwood Davis Road, North Syracuse, N.Y. 13212 • 315-453-3594

May 6, 2005

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



Attn: Shawn Norton

DOL - 6/12/03

Re: 63 claims relating to cruise control recall

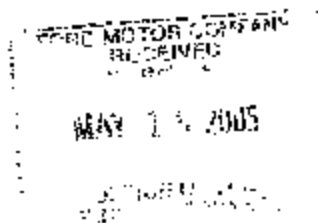
Dear Ms. Norton:

As you will recall you and I spoke 4 weeks ago. I am the manager of a centralized unit that has been handling subrogation claims Nationwide has involving automobile fires and possible defects since September, 2004. We also have been handling these claims for our affiliate company Allied since February, 2005. You have had discussions on several claims with my associates Kathie Styer, Lynn Ellis and Lynn Koenck. Our goal has been to establish a positive working relationship with your company, and to only submit claims to your company having merit.

Enclosed you will find supporting materials regarding 63 of our claims relating to the cruise control recall. We have provided a list of these claims, and supporting documents for each claim which are separated and in the same order as they appear on the list. These claims are for the eastern states in our operation. We are waiting for a report on our western states handled by Allied, and as soon as it is available I will send those to you for review. As we discussed during our phone call many of these claims were handled and closed prior to us being aware there was an issue with the cruise control. Therefore, on some of those claims we did not secure a cause an origin report, and the vehicles are no longer available. On all claims we have provided photographs and estimates that clearly document the area where the fire started.

I would appreciate discussing this with you or someone at Ford once you have received this and have had an opportunity to review. Please contact me by phone at 315-453-3594, by fax at 614-961-3180 or by EMAIL at mabbetc@nationwide.com. We look forward to continue working with you and your team, building a strong working relationship, and working towards cost effective resolutions of claims for both of our companies.

Sincerely,  
  
Craig Mabbett  
Subrogation Manager



ER05-085-LC-7767



ERR-003-LC-7788





2025-003-LC-7769







CLAIMS DEPT.

February 13, 2001

## Commerce Insurance

The Commerce Insurance Company  
Citation Insurance Company

Members of The Commerce Group, Inc.

11 Gore Road, Webster, Massachusetts 01570 (508) 949-1800  
www.CommerceInsurance.com

CUSTOMER SUPPORT  
CENTER

2001 FEB 20 A 11: 56

Ford Motor Company  
Customer Assistance Center  
300 Renaissance Center  
P.O. Box 43360  
Detroit, MI 48243



RE: Insured: [REDACTED]  
File #: JM7943-WY9148  
Date of Loss: 1/15/01

Dear Sir/Madam:

On January 15, 2001, our insured [REDACTED] suffered a fire loss to their vehicle which resulted in a total loss. Their vehicle is a 1998 Ford Ranger, VIN #1FTZR15X5WT [REDACTED]

An Investigator from J. D. Lyons has been assigned to perform a "Cause and Origin Analysis" on this vehicle at our request.

This letter, therefore, puts Ford on notice while we conduct our investigation. Once our investigation is complete, we will notify you of the results.

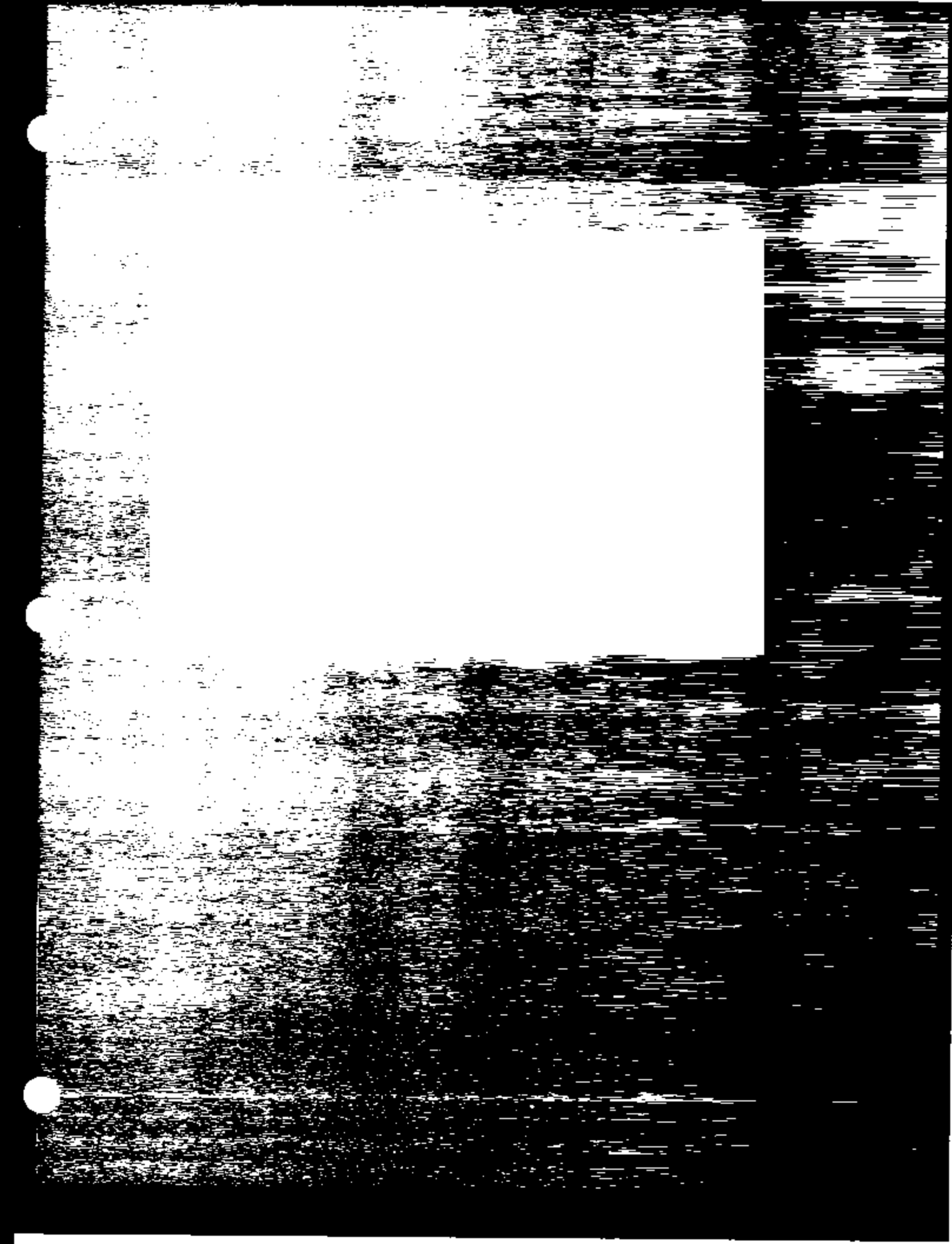
Sincerely,

THE COMMERCE INSURANCE COMPANY

Melissa Thompson Ext. 5155

Claims Adjuster

MT/eb





JUN 13 2005

ALLSTATE INDEMNITY COMPANY  
P. O. BOX 166286  
IRVING TX 75016  
(800) 374-4246

05/27/05

FORD MOTOR COMPANY  
RECEIVED  
CLAIMS UNIT

JUN 13 2005

OFFICE OF THE  
GENERAL COUNSEL

FORD MOTOR COMPANY  
3 PARKLANE BL FTW300  
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 INDEMNITY COMPANY

CBP:G

YOUR FILE NO. : [REDACTED]  
YOUR INSURED : [REDACTED]  
ADDRESS : [REDACTED]  
DEARBORN MI [REDACTED]

OUR CLAIM NO. : [REDACTED]  
OUR INSURED : [REDACTED]  
LOSS DATE : 04/20/05

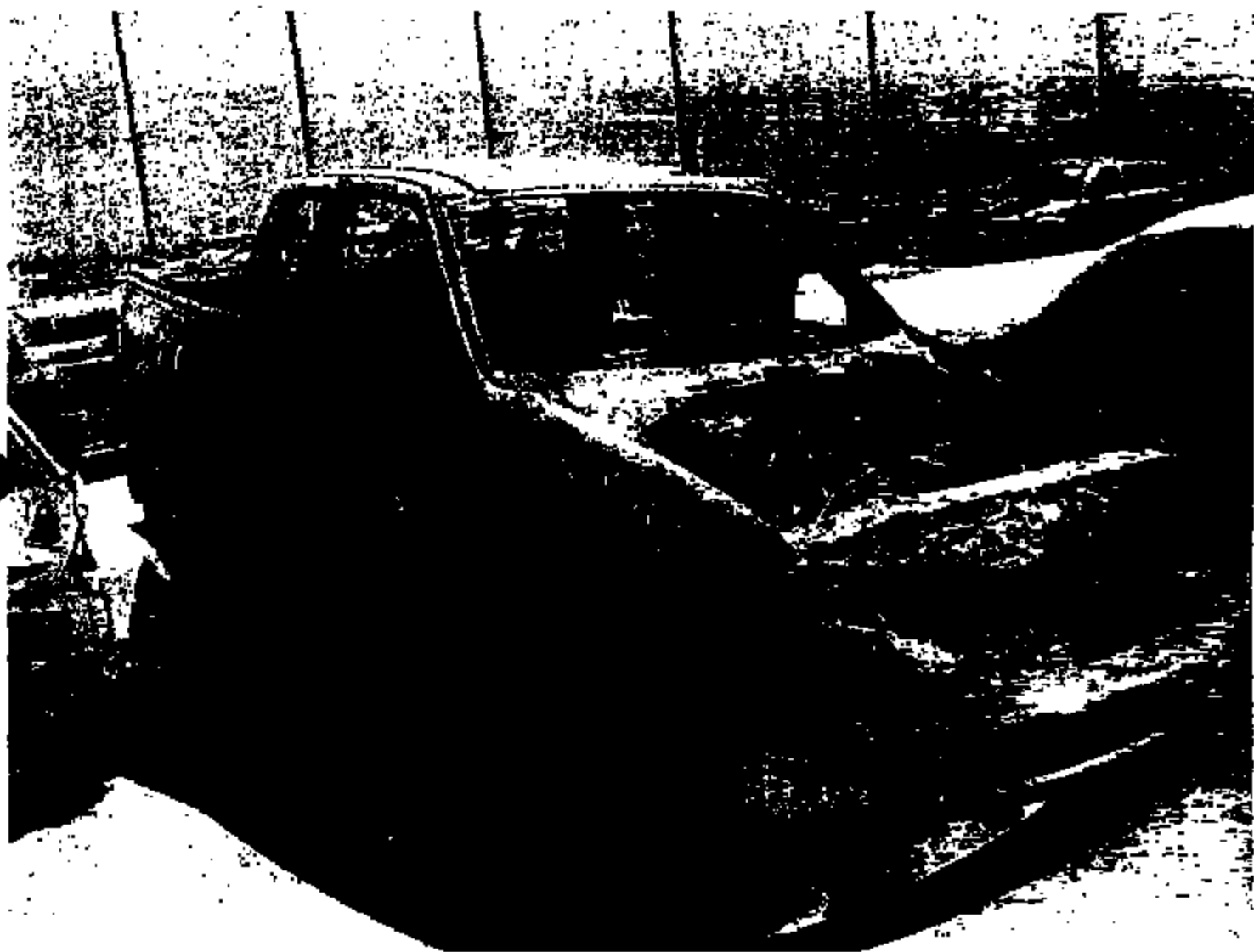
LOCATION :  
INSURED'S HOME BEAUMONT TX

AMOUNT OF LOSS: \$6,526.13

EA85-085-LC-7773

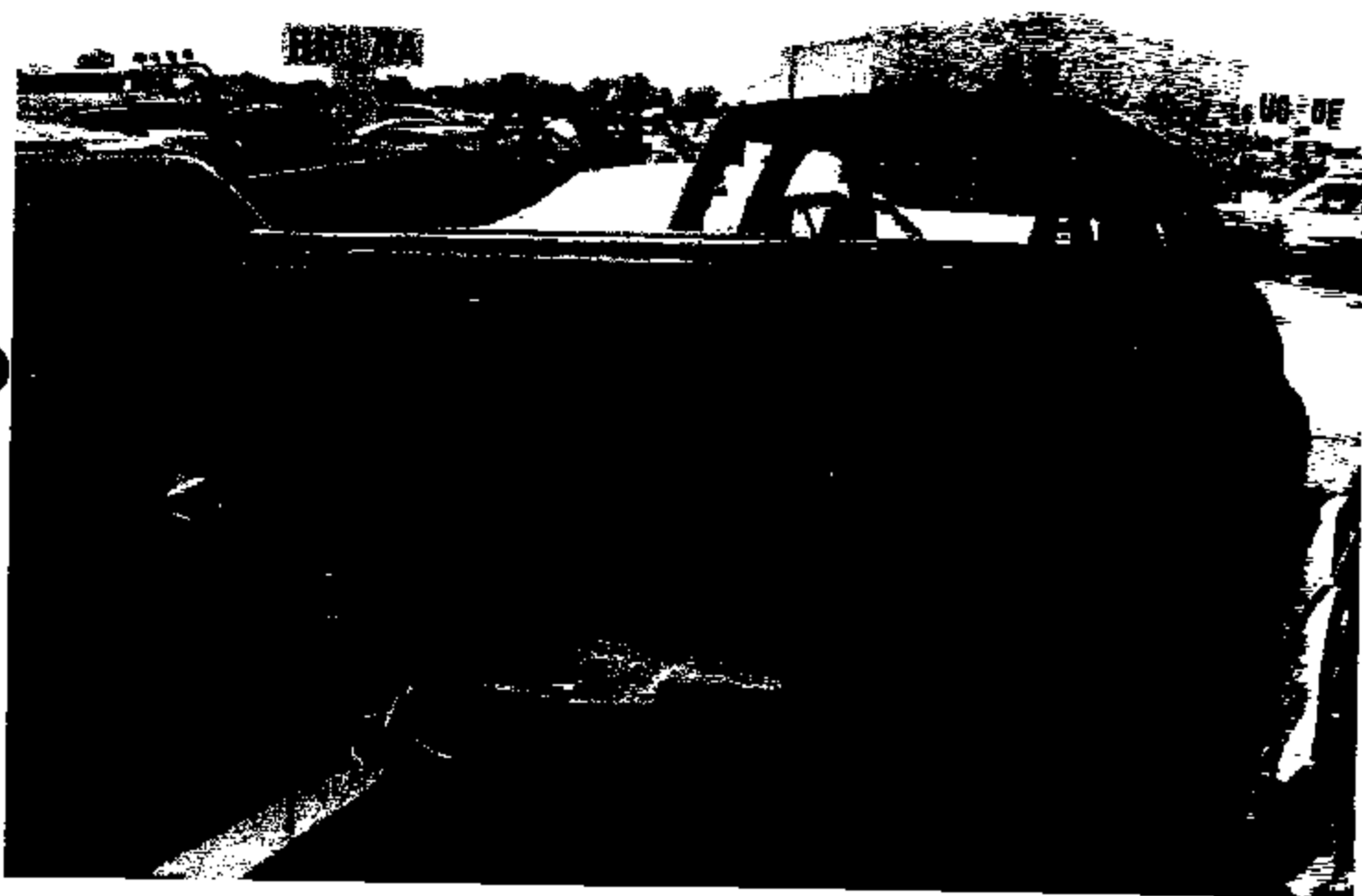
copy for  
Brie





EA85-005-LC-7775





EA85-095-LC-7778



EQ05-005-LC-7777





ISSUE LIST				
Last Handling Date/ Issue Status	Name/ Reason Desc	Vin/ Case No.	Model Year and Vehicle Line	Issue Type
4/20/2005 CLOSED	LUBERT J GULLORY LEGAL - ACCIDENT / FIRE	1FTDX07W3V [REDACTED] 396161105	1997 F-SERIES	10

6085-005-10-7780

[REDACTED] 6/21/2005

## All Action Details for Issue

Print

VIN: 1FTDX07W3VK	Year: 1997	Model: F-SERIES	Case: 396161105
Name:	Owner Status: Subsequent	WSD: 1995-04-09	
Symptom Desc: FIRE/SMOKE VISIBLE FLAME UNDERHOOD		Primary Phone:	
Reason Desc: LEGAL - ACCIDENT / FIRE		Secondary Phone:	
Issue Type: 10 OGC	Issue Status: CLOSED		

Action: CONTACT ADVANCED TO OGC

Dealer: 04413 KINSEL FORD, INC.

Odometer: 110000 MI

Analyst Name: ROBINSON ANITA

Action Date: 04/20/2005

Comm Type: PHONE

Analyst: AROBIN85

Action Time: 10.59.40.528

Origin Desc: US CONCERN CASE BASE

Action Date: No

## Caller Information if Different From Vehicle Owner:

First Name

KINNIA

Middle Initial

Last Name

GULLORY

Day Phone

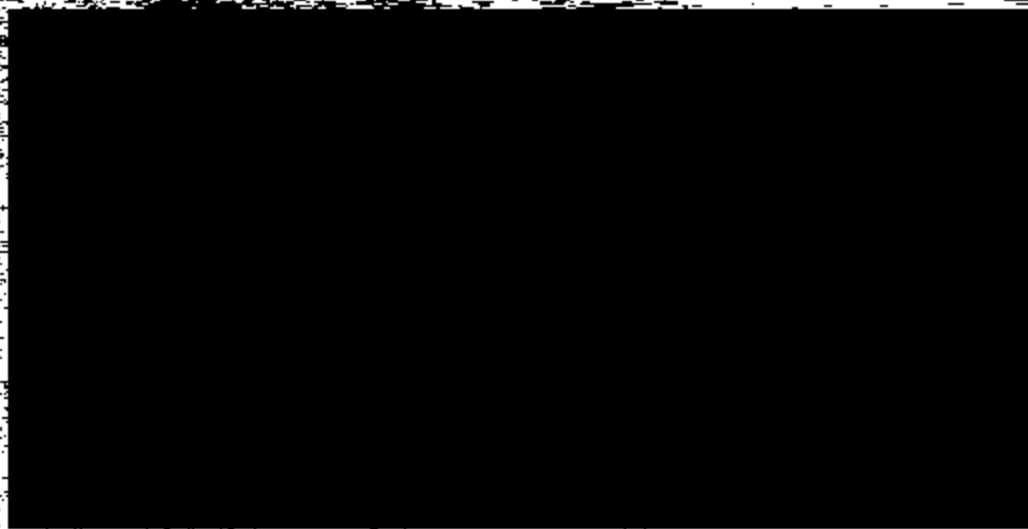
4097912315

Relationship

CHILD

Comments CUSTOMER SAID: FIRE DATE: APRIL 20,05 LOCATION: AT CUST HOME FIRE REPORT HAS BEEN FILED AS THEY CAME TO PUT OUT THE FIRE INJURIES: NONE FIRE DAMAGED THE SIDE OF THE HOUSE AND THE VEH HAS BURNT BEYOND REPAIR HAS NOT CONTACTED HER INS COMPANY YET=CUST HAS REC'D A LETTER ABOUT FORD VEH'S CATCHING FROM ORIGINATING FROM UNDER THE HOOD=THIS HAS HAPPENED TO HER VEH=CUST WANTS TO KNOW IF THIS RECALL APPLIES TO HER VEH AND WHAT ACTION FORD IS GOING TO TAKE WITH HER SITUATION=DEALER SAID: NONE CRC ADVISED: I WILL FORWARD THIS INFORMATION TO THE FORD OGC DEPARTMENT. YOU WILL BE CONTACTED WITHIN 3-5 BUSINESS DAYS.

E903-003-LC-7761



APR 21 2005

BEGINNING OF CONTACT  
04/21/2005

## VOICE OF THE CUSTOMER TRACKING SYSTEM

08.00.04

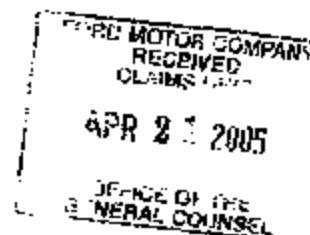
REGION: 52 SOUTHWEST	OGC ISSUE	CASE NBR: 0398161105
VIN: 1FTDX07W3V	ZONE: B3	OPENED: 04/20/2005
	ENGINE: W VEH TYPE: T	CLOSED: 04/20/2005

LAST NAME: [REDACTED]	FIRST NAME: [REDACTED]	STATUS: CLOSED
TITLE: [REDACTED]		MI: J
ADDRESS: [REDACTED]		
CITY: BEAUMONT	STATE: TX	ZIP: [REDACTED]
HOME PHONE: [REDACTED]		
MODEL YEAR: 1997	MODEL: F150 4X2 SUPERCAB PICKUP	
MILEAGE: 110000		
DEALER NAME: KINSEL FORD, INC.	SALES CODE: F52084	P & A: 04413
REASON CODE: 0792 LEGAL - ACCIDENT / FIRE		
SYMPTOMS: 704146 FIRE/SMOKE VISIBLE FLAME UNDERHOOD		

ORIGIN: CACI38 - US CONCERN CASE BASE COMMUNICATION: PHONE  
 ACTION: 705 - CONTACT ADVANCED TO OGC  
 DOCUMENT: ANALYST: AROBIN65 ROBINSON ANITA

DATE: 04/20/2005 TIME: 10.59.40:  
 ACTION DATA/COMMENTS:

CUSTOMER SAID: FIRE DATE: APRIL 20,05 LOCATION: AT CUST HOME  
 FIRE REPORT HAS BEEN FILED AS THEY CAME TO PUT OUT THE FIRE IN  
 JURIES: NONE FIRE DAMAGED THE SIDE OF THE HOUSE AND THE VEH H  
 AS BURNT BEYOND REPAIR HAS NOT CONTACTED HER INS COMPANY YET=  
 CUST HAS REC'D A LETTER ABOUT FORD VEHs CATCHING FROM ORIGIN  
 ATING FROM UNDER THE HOOD=THIS HAS HAPPENED TO HER VEH=CUST  
 WANTS TO KNOW IF THIS RECALL APPLIES TO HER VEH AND WHAT ACT  
 ION FORD IS GOING TO TAKE WITH HER SITUATION=DEALER SAID: NO  
 NECRC ADVISED: I WILL FORWARD THIS INFORMATION TO THE FORD O  
 GC DEPARTMENT. YOU WILL BE CONTACTED WITHIN 3-5 BUSINESS DAY  
 S.







IN THE IOWA DISTRICT COURT FOR PLYMOUTH COUNTY, IOWA

██████████  
Plaintiff,

vs.

FORD MOTOR COMPANY

Defendant.

Case No. LAW030454

COPY

PETITION AT LAW

FILED  
JUL 17 AM 11:11  
PLYMOUTH COUNTY COURT

COMES NOW the Plaintiff ██████████ and for his cause of action against the Defendant, Ford Motor Company, states as follows:

1. At all times relevant hereto the Plaintiff ██████████ was a resident of Kingsley, Plymouth County, Iowa.
2. At all times relevant hereto the Defendant Ford Motor Company was a Delaware corporation authorized to do business in the State of Iowa.
3. Plaintiff Larry Guthridge was the owner of a 2001 Ford Ranger (VIN No. 1FTVR15E1H██████████).
4. Defendant Ford Motor Company is the designer, manufacturer, assembler, and distributor of Plaintiff's 2001 Ford Ranger.
5. On or about November 6, 2001, the Plaintiff ██████████'s 2001 Ford Ranger located in Plymouth County, Iowa, spontaneously started on fire while sitting in Plaintiff's driveway.
6. As a result of the fire, the Plaintiff's vehicle was destroyed and personal property within the vehicle was destroyed.



14. The spontaneous fire in the 2001 Ford Ranger was not the type of occurrence that in the regular course of operation of the 2001 Ford Ranger would happen if reasonable prudent care had been taken by the Defendant Ford Motor Company.

WHEREFORE, the Plaintiff [REDACTED] respectfully requests judgment against the Defendant Ford Motor Company in an amount which will fully compensate him for damages sustained, including compensatory damages, interest as allowed by law in the course of this action and for any future and further relief this Court might deem just and equitable.

**PEDDICORD, WHARTON, SPENCER  
& HOOK, L.L.P.**

  
\_\_\_\_\_  
Scott J. Beattie PK#2027405  
405 Sixth Avenue, Suite 700  
PO Box 9130  
Des Moines, IA 50306  
Phone/Fax: 515-243-2100 / 515-243-2132  
**ATTORNEY FOR PLAINTIFF**  
[REDACTED]

**PROOF OF SERVICE**

The undersigned certifies that the foregoing instrument has been served upon all parties to the above named in each of the addresses of record herein at their respective addresses disclosed on the pleadings on 6/25/04  
by 2 US Mail Per Hand Delivered Overnight Service  
Signature James Coleman

# LA LEUWERKE & ASSOCIATES, INC.

**ADJUSTMENT/APPRaisal DIVISION**

Ron Leuwerke  
Dan Waller  
Joe Elert  
Thomas C. Newbiggin  
Kevin P. Johnson

**OFFICE MANAGER**

Connie Bissell

**INVESTIGATIVE DIVISION**

Lonn Abeltins  
Ted Strait  
Kevin Lanphier

**INVESTIGATIVE REPORT #1**

Mr. Mike Hoogers  
Progressive Insurance Company  
4280 Sergeant Road Suite 260  
Sioux City IA 51106

RE:      Date:      January 7, 2002  
         File No.:      12545  
         Claim No.:      [REDACTED]  
         Policy No.:      [REDACTED]  
         Insured:      [REDACTED]  
         Loss Loc.:      [REDACTED]  
                         Kingsley IA  
         D/L:      11/6/01

Dear [REDACTED]:

This will be my first report regarding the investigative assignment referred to this office on November 13, 2001.

**ENCLOSURES**

1. Copy of vehicle description recovered from fire damaged vehicle.
2. 40 Color photographs.

**ORIGIN AND CAUSE INVESTIGATION**

At your request, on November 14, 2001 I traveled to the insured's residence located at [REDACTED] Kingsley, Iowa. I met with the insured's wife [REDACTED] and conducted a brief verbal interview regarding the vehicle, which will be addressed later on in the report. My examination and photographs of the vehicle are as follows.

This fire loss occurred in a 2001 four-wheel drive Ford Ranger pick-up model XLT. The V.I.N. number listed on the vehicle was 1FTZR15E11P[REDACTED] manufactured by the Ford Motor Company in July of 2001. The vehicle was equipped with a 4.0 V6 engine with approximately 5,000 miles on the vehicle. The fire caused very extensive fire

damage to the engine compartment and spread through the firewall also causing extensive interior damage to the passenger area. My photographs of the damaged vehicle are as follows.

#### PHOTOGRAPHS

1. Location of the vehicle as found at the time of the exam outside of the Guthridge residence.
2. Close up of the back of the vehicle showing no visible evidence of fire damage except through the back window of the cab.
3. View of the passenger side of the vehicle showing the most extensive fire damage to be visible in the engine compartment area.
4. View of the interior of the passenger side of the vehicle showing extensive fire damage that extended through the firewall.
5. This shows the dash area on the passenger side of the vehicle showing extensive fire damage.
6. Close up of the ignition key showing the key still in the ignition at the time of this exam.
7. View looking from the vehicle towards the garage of the residence. The vehicle was parked in the approximate location indicated by the arrow when the fire was discovered and moved away from the residence by [REDACTED] the son of the insured, while the fire was in progress.
8. View of the driver's side of the vehicle again showing the most extensive fire damage visible in the engine compartment area. As you will notice the tire on the driver's front of the vehicle received only minor heat and fire damage. The tire on the passenger side front of the vehicle received much more extensive fire damage and was flat at the time of the examination.
9. View of the interior of the driver's side of the vehicle showing extensive heat and smoke damage. As you will notice the driver's side of the vehicle received much less fire damage than the passenger side as seen in photograph #4. This again would indicate that the fire spread to the interior through the air conditioner and heater opening in the firewall.

10. Close up of the vehicle identification label on the doorframe confirming the V.I.N. number and the manufacturer's date of July 2001.
11. View of the front of the vehicle showing very extensive heat and fire damage with the most extensive fire damage on the passenger side to the head light and grill area.
12. View again showing the vehicle parked in the driveway. In the foreground, the debris can be seen on the driveway where the vehicle was parked when the fire was discovered.
13. Engine compartment with the hood raised showing the most extensive heat and fire damage to the under side of the hood on the passenger side.
14. This is another view of the underside of the hood with the insulation portion that was laying in the truck box being held back in place again showing the most extensive fire damage to be on the passenger side of the engine compartment.
15. This again shows the same piece of insulation seen in photograph #14 showing the very extensive fire damage to this piece of insulation on the passenger side of the engine compartment.
16. View of the engine compartment again showing the most extensive fire damage on the left passenger side of the engine compartment.
17. Close up of the driver's side of the vehicle showing less fire damage to the fender.
18. View of the engine compartment as seen from the driver's side of the vehicle.
19. View of the driver's side of the engine showing heat damage to some of the wiring, but it was still intact at several areas.
20. View of the radiator area as seen from the driver's side showing the most extensive fire damage to the passenger side of the radiator.
21. This again is a view of the driver's side of the engine compartment showing high heat and fire damage to the battery and other items in this area.
22. Close up of the passenger side of the front fender showing much more extensive fire damage to the fender.

23. Close up view of the passenger side of the engine compartment showing much more extensive fire damage to the wiring looms and other items in this area.
24. Close up of photograph #23 again showing much more extensive damage to the contents of the engine compartment on the passenger side. The openings in through the firewall for the air conditioning and heater allowed the heat to enter the passenger area of the vehicle causing extensive interior damage.
25. Close up of the passenger side of the engine again showing very extensive heat and fire damage. As you will notice in the upper right hand corner, the radiator on the passenger side shows evidence of extensive heat and fire damage.
26. Close up of the wiring loom on the passenger side of the vehicle showing extensive heat and fire damage and some evidence of ground fault.
27. Close up of photograph #26 showing the extensive fire damage to the wiring on the passenger side of the vehicle.
28. View under the vehicle as seen from the front bumper again showing the most extensive fire damage to the passenger side of the vehicle.
29. View of the left front tire as seen from under the vehicle showing evidence from melting from the interior fender cover dropping down on the tire.
30. View of the passenger side on the front of the vehicle as seen from the front bumper showing much more extensive drop down fire damage.
31. View of the underside of the vehicle from the driver's side showing extensive drop down fire damage on the passenger side.
32. View looking towards the back underside of the vehicle showing no visible evidence of fire damage to the frame and/or back tire areas.
33. This again is a view under the vehicle from the passenger side looking towards the driver's side front tire showing much less evidence of drop down fire damage around the tire.
34. View looking on the underside of the vehicle towards the back driver's side showing no visible evidence of fire damage to the back half of the vehicle.



Page Five  
January 7, 2002

I also recovered the fire-damaged portion of the vehicle description sheet that comes with the vehicle and a copy is included with this report for your review. My visual examination of the fire-damaged vehicle included a check of the transmission oil level and the fluid included to be at an acceptable level and clean. A check of the engine oil level indicated that it was full and the oil appears to be somewhat clean.

Interview

In a verbal interview on November 15, 2001, I received the following information from [redacted] is age [redacted] and her date of birth is [redacted], [redacted] is age [redacted] and his date of birth is [redacted]. [redacted] have four children, [redacted] age [redacted] age [redacted] age [redacted] and [redacted]. Sandra indicated that the vehicle was purchased new in August of 2001 and at the time of the fire, loss had approximately 5,000 miles on the odometer. Larry normally always drives the vehicle, but on the date that the fire loss occurred, their son [redacted] had taken the truck to Menville to help [redacted] mother move some items. [redacted] reportedly left Menville at approximately 3:45 p.m. and came home to the house by himself. He later told his mother that he had gone to the bathroom when he heard the phone ring. The telephone call was from a person at the Anderson Implement Company in Kingsley, Iowa. The caller told [redacted] that one of their truck drivers had driven by the [redacted] residence and saw smoke coming from their pick up. [redacted] immediately ran outside and could see smoke and immediately called 911 on their portable phone. [redacted] indicated that [redacted] was driving by and he saw [redacted] and the fire in the driveway. He stopped and helped [redacted] move the vehicle away from the house just prior to the Menville Fire Departments arrival. She indicated that the fire chief at Menville Fire Department is Mr. John Hess and that I could contact him for any information that I needed regarding the fire departments response. She also confirmed that the caller ID on their telephone in the house was from Anderson Implement in Kingsley and the time was listed as 4:11 p.m. [redacted] indicated at the best of her knowledge that they had no problems with the vehicle prior to the fire loss and that it ran and started perfectly. The only time that the vehicle had been taken back to the dealership to have one of the doors adjusted due to the fact that it did not appear to be closing properly. [redacted] indicated that at the time that the fire occurred she was in Menville painting an apartment and not aware of the fire until she got home. The Menville Fire Department vehicle was still at her residence when she arrived. [redacted] indicated that her husband had not installed or had any additional equipment installed on the vehicle after it was purchased. The vehicle had been purchased at the dealership in LeMars, Iowa. [redacted] had no additional information for me at this time.

Prior to leaving the Merville Fire Department, I traveled to the Merville City Hall and left my card for Fire Chief Hess with his wife who is the city clerk. I then returned to the Des Moines area.

On November 15, 2001, I received a telephone call from Chief Hess and he gave me the following information. When the fire department arrived at the [redacted] residence, there was extensive fire visible under the hood with fire showing on the right front tire. [redacted] gave him the same information that I received from his mother [redacted] regarding how the fire occurred and how it was discovered. Although he did not determine the exact point of origin, he did feel that the fire originated under the hood on the passenger side in the engine compartment. Joseph had also told Chief Hess that they had not installed any new equipment on the vehicle since it was purchased. After returning to the Des Moines area, on November 15, I traveled to Dewey Ford dealership in Des Moines, Iowa to visually examine and photograph an example of the vehicle and the engine compartment. The salesman told me that the vehicle was the exact model and the engine compartment was the same although the vehicle was listed as a 2002 manufactured vehicle.

My photographs of the exemplar vehicle are as follows:

35. View of the front of the vehicle.
36. View of the engine compartment as seen from the passenger side.
37. View of the engine compartment as seen from the front of the vehicle.
38. Close up view of the contents of the engine compartment of the passenger side.
39. View of the driver's side of the engine compartment showing the contents and various components of the engine compartment.
40. View of the engine compartment as seen from the driver's side. As you will notice in comparison to the fire-damaged vehicle, most of the upper plastic and other components were either heavily fire damaged or destroyed in the fire.

#### COMMENTS

It is this investigator's opinion that after examining the vehicle and concerning all other information received to this date that the general area of origin and the cause of this fire is on passenger side of the engine compartment. The only accidental source of ignition in this area would be of an electrical nature although due to the extensive fire damage to this

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area I could not determine the exact point of origin. I also did not do any destructive examination or movement of the wiring for possible future examination by other interested parties. I found nothing that would indicate the cause of this fire to be of a suspicious nature. Please contact me at this office for any additional information or investigative work that needs to be completed on the file. Enclosed is a service bill for your consideration. Thank you for the opportunity to be of service.

Respectfully submitted,

*Ted Strait*

Ted Strait  
Fire Investigator

TS/dcc  
Enc.

FCSD REGION: \_\_\_\_\_ MARKET: \_\_\_\_\_ ISSUE STATUS: \_\_\_\_\_  
P&A CODE: \_\_\_\_\_  
VIN: 1FTZR15E11[REDACTED] CASE NUMBER: \_\_\_\_\_  
SALES REGION: \_\_\_\_\_ SALES ZONE: \_\_\_\_\_ ISSUE TYPE: \_\_\_\_\_

A	LAST HND/	Customer Phone Number/	Reason/	Stat/
C	P&A LAO	Trmt Customer Name	Year Model	Type
	11/13/01	[REDACTED] (H)	LEGAL - FIRE CLAIM	C
	00619	VLC [REDACTED]	2001 RANGER	07

F1=Help F2=AddAction F5=CustomerList F6=DealerInfo  
F7=Prev F8=Next F10=IssueDetail F11=Menu F12=Return  
NO MORE RECORDS AVAILABLE OGDB427

VIN: 1FTZR15E11P Year: 2001 Model: RANGER  
Owner Status: ORIGINAL WSD: 08/09/01 Mileage: 5000  
Name: [REDACTED] Hm Ph: [REDACTED]  
Trmt: VLC Case: 365323161 Day Ph: [REDACTED]  
Symptom: FIRE/SMOKE SMOKE  
Reason: LEGAL - FIRE CLAIM  
Dealer: LEMARS FORD MERCURY, INC.  
Issue Type: 07 LEGAL CAN Court: Legal Issue Type:  
Issue Status: C CLOSED CAN Award: MORSI Contact: N

## A/C DATE Origin Description

11/12/01 CALGL OPEN LEGAL CONTACT - PRODUCT LIABILITY  
11/12/01 CALGL MAKE OUTBOUND CALL TO DEALER  
11/13/01 CALGL INFORMATIONAL CALL/FAX WITH CUSTOMER  
11/13/01 CALGL FINAL CASE DISPOSITION

F1=Help F2=AddAction F4=ActionDetail F6=DealerInfo  
F7=Prev F8=Next F9=ViewMORSII F11=Menu F12=Return  
NO MORE RECORDS AVAILABLE OGDB427

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VIN: 1FTZR15E11 Year: 2001 Model: RANGER  
Owner Status: ORIGINAL WSD: 08/09/01  
Name: Hm Ph:   
Trmt: VLC Case: 365323161 Day Ph:   
Symptom Desc: FIRE/SMOKE SMOKE  
Reason Desc: LEGAL - FIRE CLAIM  
Dealer: LEMARS FORD MERCURY, INC.  
Issue Type: 07 LEGAL Issue Status: C CLOSED  
Comm Type: FX FAX Odometer Reading: 5000 MI  
Analyst: ABEASLE1 ALICIA BEASLEY Document Number:   
Action Date: 11/12/01 Action Data: N Action Time: 10:08:52 EST  
Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION  
Action Desc: OPEN LEGAL CONTACT - PRODUCT LIABILITY  
Comments: \*\*\*\*\*ATTORNEY DEMAND LETTER\*\*\*\*\*  
REC'11/12/01  
ATTORNEY ALLEGES DEFECTIVE VEHICLE.

CUSTOMER ALLEGES THAT HIS VEHICLE IS DEFECTIVE.

F1=Help F2=AddAction F4=PrevAction F5=NextAction F6=ActionData  
F9=PrevComments F10=NextComments F11=Menu F12=Return F13=ESP  
MORE COMMENTS AVAILABLE

OGDB427

SFCHADMA

Action Detail

04/10/02 10:23:54

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VIN: 1FTZR15E11R Year: 2001 Model: RANGER  
Owner Status: ORIGINAL WSD: 08/09/01  
Name: Hm Ph: [REDACTED]  
Trmt: VLC Case: 365323161 Day Ph: [REDACTED]  
Symptom Desc: FIRE/SMOKE SMOKE  
Reason Desc: LEGAL - FIRE CLAIM  
Dealer: LEMARS FORD MERCURY, INC.  
Issue Type: 07 LEGAL Issue Status: C CLOSED  
Comm Type: FX FAX Odometer Reading: 5000 MI  
Analyst: ABEASLE1 ALICIA BEASLEY Document Number:  
Action Date: 11/12/01 Action Data: N Action Time: 10:08:52 EST  
Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION  
Action Desc: OPEN LEGAL CONTACT - PRODUCT LIABILITY  
Comments:

\*\*CUSTOMER REQUEST THAT A FORD REPRESENTATIVE CONTACT HIM TO  
DISCUSS THIS MATTER.\*\*

F1=Help F2=AddAction F4=PrevAction F5=NextAction F6=ActionData  
F9=PrevComments F10=NextComments F11=Menu F12=Return F13=ESP  
NO MORE COMMENTS AVAILABLE

OGDB427

E905-005-LC-7796

VIN: 1FTZR15E11P Year: 2001 Model: RANGER  
Owner Status: ORIGINAL WSD: 08/09/01  
Name: MR. BARRY S. GUTENBERG Hm Ph: [REDACTED]  
Trmt: VLC Case: 365323161 Day Ph: [REDACTED]  
Symptom Desc: FIRE/SMOKE SMOKE  
Reason Desc: LEGAL - FIRE CLAIM  
Dealer: LEMARS FORD MERCURY, INC.  
Issue Type: 07 LEGAL Issue Status: C CLOSED  
Comm Type: FX FAX Odometer Reading: 5000 MI  
Analyst: LTURN32 LAKESIA TURNER Document Number:  
Action Date: 11/12/01 Action Data: Y Action Time: 13:34:30 EST  
Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION  
Action Desc: MAKE OUTBOUND CALL TO DEALER  
Comments: \*\*\*LPA LEFT MESSAGE FOR WAYNE STECKELBERG TO CONTACT ME AT 3  
13-845-5483.

F1=Help F2=AddAction F4=PrevAction F5=NextAction F6=ActionData  
F9=PrevComments F10=NextComments F11=Menu F12=Return F13=ESP  
NO MORE COMMENTS AVAILABLE

OGDB427



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VIN: 1FTZR15E11 Year: 2001 Model: RANGER  
Owner Status: ORIGINAL WSD: 08/09/01  
Name: Hm Ph:   
Trmt: VLC Case: 365323161 Day Ph:   
Symptom Desc: FIRE/SMOKE SMOKE  
Reason Desc: LEGAL - FIRE CLAIM  
Dealer: LEMARS FORD MERCURY, INC.  
Issue Type: 07 LEGAL Issue Status: C CLOSED  
Comm Type: FX FAX Odometer Reading: 5000 MI  
Analyst: LTURN32 LAKESIA TURNER Document Number:   
Action Date: 11/13/01 Action Data: N Action Time: 11:50:06 EST  
Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION  
Action Desc: INFORMATIONAL CALL/FAX WITH CUSTOMER  
Comments: \*\*\*LPA SPOKE WITH THAT INFORMED ME THAT VEHICL  
WAS PARKED IN DRIVEWAY WHEN IT CAUGHT FIRE.  
EDGE INDICATED SHE HAD NO IDEA WHAT WAS GOING ON WITH HER IN  
SURANCE COMPANY. VEHICLE IS CURRENTLY IN DRIVEWAY WAITING FO  
R INSPECTORS. CUSTOMER THOUGHT FORD INSPECTORS WERE COMING  
OUT. LPA INFORMED CUSTOMER I WOULD CONTACT INSURANCE COMPANY

F1=Help F2=AddAction F4=PrevAction F5=NextAction F6=ActionData  
F9=PrevComments F10=NextComments F11=Menu F12=Return F13=ESP  
MORE COMMENTS AVAILABLE

OGDB427

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VIN: 1FTZR15E11F Year: 2001 Model: RANGER  
Owner Status: ORIGINAL WSD: 08/09/01  
Name: [REDACTED] Hm Ph: [REDACTED]  
Trmt: VLC Case: 365323161 Day Ph: [REDACTED]  
Symptom Desc: FIRE/SMOKE SMOKE  
Reason Desc: LEGAL - FIRE CLAIM  
Dealer: LEMARS FORD MERCURY, INC.  
Issue Type: 07 LEGAL Issue Status: C CLOSED  
Comm Type: FX FAX Odometer Reading: 5000 MI  
Analyst: LTURN32 LAKESIA TURNER Document Number:  
Action Date: 11/13/01 Action Data: N Action Time: 11:55:51 EST  
Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION  
Action Desc: FINAL CASE DISPOSITION  
Comments: \*\*\*LPA SPOKE WITH INSURANCE AGENT, JOHN, THAT INDICATED THEY  
ARE SENDING INSPECTORS OUT TO VIEW CUSTOMER'S VEHICLE. THEY  
ARE GOING TO PAY CUSTOMER CLAIM AND IF THERE IS ANY PRODUCT  
DEFECT THEY WILL FILE SUBROGATION. LPA GAVE INSURANCE AGENT  
SUBROGATION ADDRESS. LPA SENT CUSTOMER CLOSING LETTER DATED  
11-13-2001.  
F1=Help F2=AddAction F4=PrevAction F5=NextAction F6=ActionData  
F9=PrevComments F10=NextComments F11=Menu F12=Return F13=ESP  
NO MORE COMMENTS AVAILABLE

OGDB427