



MAY 02 2005

April 27, 2005

Ford Motor Company
Office of the General Counsel
Park lane Towers West, Suite 300
Three Parklane Boulevard
Dearborn, Michigan 48126

PROGRESSIVE INSURANCE

Ref: 2001 F-150, 4X4 4C vehicle fire

Vin # 1FTRX18L41N [REDACTED]

Owner: [REDACTED] Ona, Florida [REDACTED]

Policy # [REDACTED]

Claim# [REDACTED]

To whom it may concern,

Progressive Insurance is in the process of conducting a cause and origin on the aforementioned vehicle, belonging to our insured.

A preliminary investigation determined that while parked and unoccupied, our insured's vehicle caught fire in the engine compartment after having been parked for some time. The fire caused extensive damage and the vehicle is a total loss.

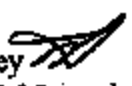
We are sending you this letter to advise you of our intent and to coordinate with you a date and time that is convenient for one of your representatives to be present at the inspection. Be advised that invasive exploration of the vehicle is in order to determine the precise cause. This exam has been scheduled for May 12, 2005 at 10:00 in Sebring Florida

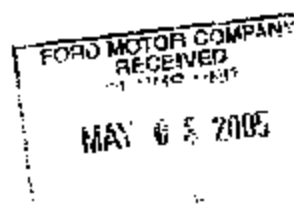
Any items removed will be retained by our vendor, Advanced Engineering Associates; will be retained until such time as their investigative analysis is completed.

Please contact me by May 10, 2005. If I do not hear from you by this date we will proceed with our examination.

Please contact me by telephone at your earliest convenience at 813-267-3602

Sincerely,

Michael A. Headley 
Investigator, Special Investigations Unit
2926 Falkenburg rd.
Riverview, Florida 33569



EA05-005-LC-7800





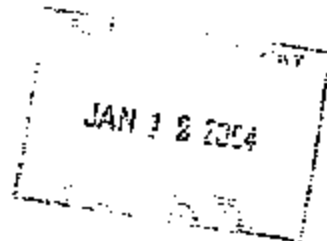
AMERICAN FAMILY INSURANCE GROUP

9000 AMERICAN PKWY • MADISON WI 53783-0001 • PHONE: (608) 249-3111

January 9, 2004

CERTIFIED MAIL - Return Receipt Requested

The Office of General Counsel
Ford Motor Company
Park Lane Towers West
Suite 300
Three Park Lane Boulevard
Dearborn, MI 48126-2588



RE: Claim Number: [REDACTED]
Policyholder Name: [REDACTED]
Policyholder Address: [REDACTED]
Independence, MO

Dear Sir or Madam:

Please be advised that the above named policyholder suffered a fire damage loss to a 1996 Ford Bronco and home on December 17, 2003. An investigation of the fire damage has been initiated. Based on findings to date, it appears that possible wiring failure to a 1996 Ford Bronco may have contributed to or caused the loss and/or resulting damages.

We are hereby giving you the opportunity to view the fire damage vehicle prior to any destructive testing that may be done. We will only be able to hold the vehicle until January 26, 2004. Please contact me upon receipt of this letter to let me know if you expect to view the vehicle. If we fail to hear from you by the prescribed date, we reserve the right to take possession of the vehicle and conduct any testing we deem necessary.

If you have any questions, please feel free to contact me at (816) 590-9230 to make arrangements for inspection. Thank you for your attention to this matter.

Sincerely,

Steve B. Thompson

Steve B. Thompson
Investigator
Special Investigations Unit

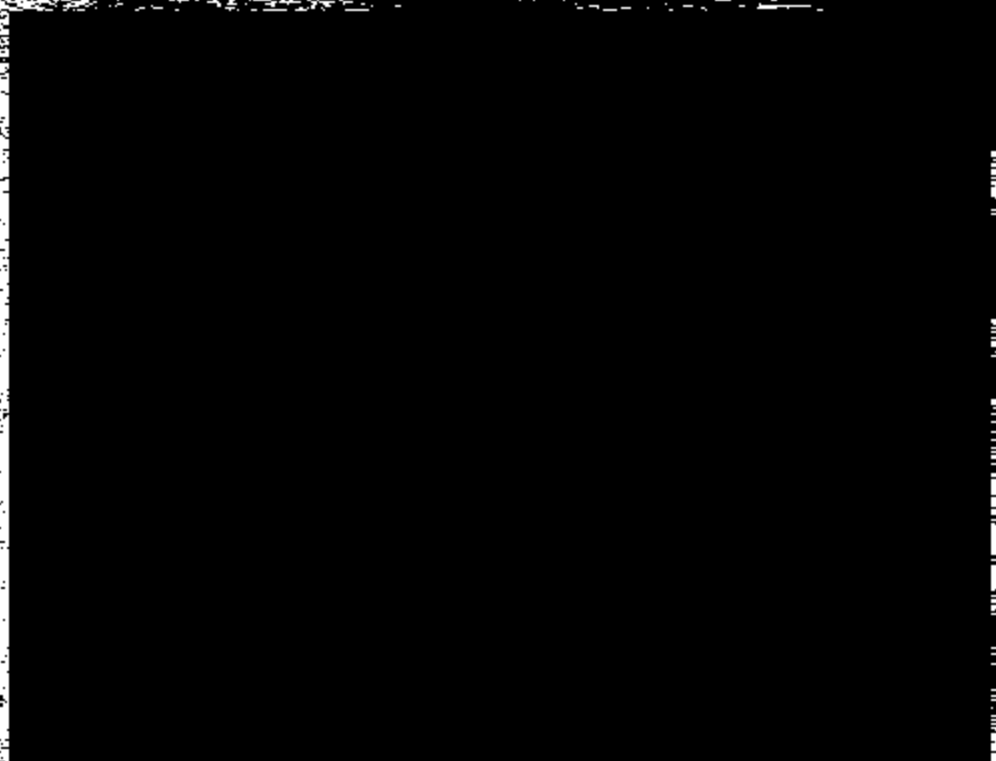
SBT:jmk

cc: Tod Solsberg

JS

*- 196 Bronco
- 12/17/03*

ER05-005-LC-7881



State Farm Insurance Companies



October 13, 2003

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

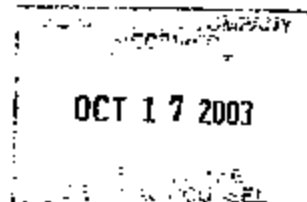
CONSUMER AFFAIRS SECTION

3 OCT 16 P4 06

State Farm Insurance Companies
Columbia Service Center
Special Investigative Unit
6706 Alexander Bell Drive
Columbia, Maryland 21046

CERTIFIED MAIL - RETURN RECEIPT REQUESTED AND COPY VIA REGULAR MAIL

RE: Insured: [REDACTED]
Claim Number: [REDACTED]
Date of Loss: September 20, 2003
Vehicle: 2001 Ford Ranger
VIN: 1FTZR15E11 [REDACTED]

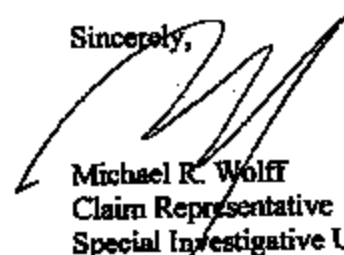


To Whom It May Concern:

The identified 2001 Ford Ranger is insured with State Farm Mutual Insurance Automobile Insurance Company. This vehicle experienced a fire.

State Farm would like to give you an opportunity to inspect the 2001 Ford Ranger and give you advance notice of our potential subrogation claim. Please contact me at (410) 290-2207 with in ten days of this correspondence to setup a time for your inspection.

Sincerely,


Michael R. Wolff
Claim Representative
Special Investigative Unit
State Farm Mutual Automobile Insurance Company
(410) 290-2207
1-800-346-0096

CC: Dennis Mignogno, James F. Valentine, Jr., Inc.

- 9/20/03
- 101 Ranger
- VIN



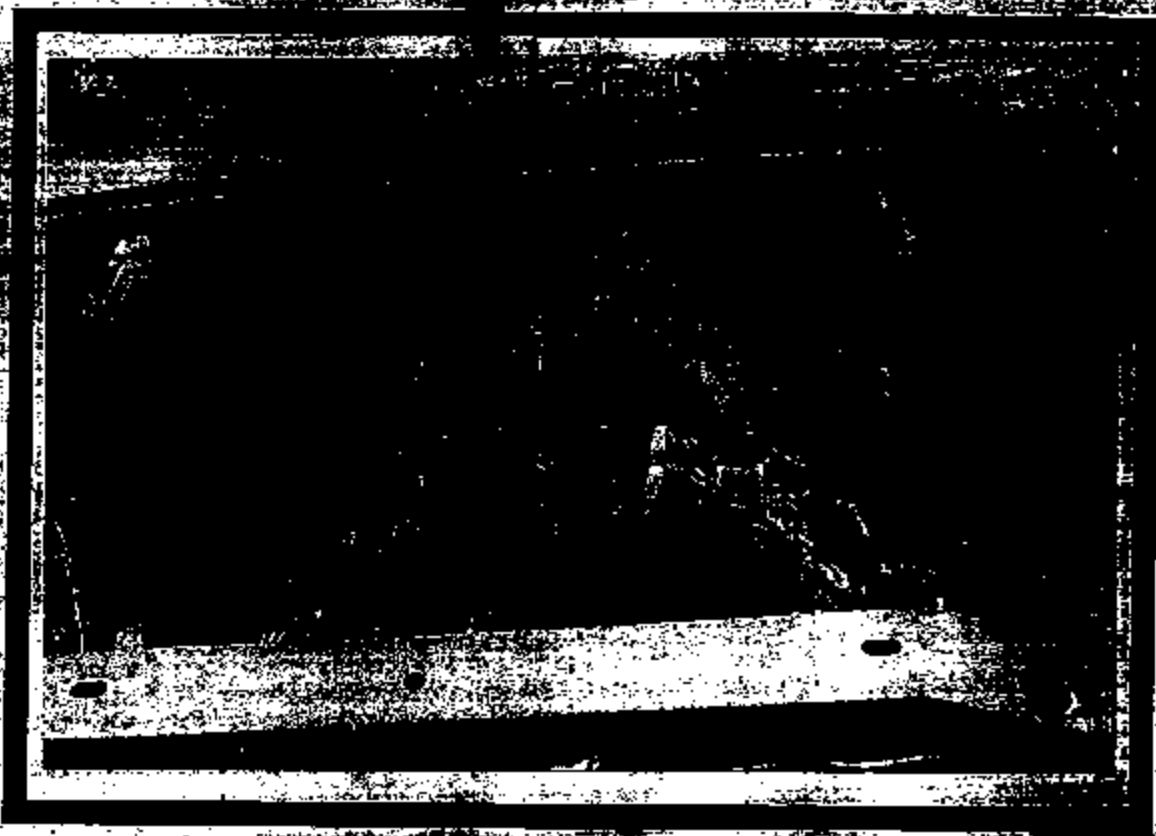
Consulting Service
Transportation Technology

1184 Wind Hill Lane
Marietta, Ga. 30064

Telephone (770) 426-6173

FAX (770) 426-6173

TELETYPE (404) 342-7518



Photograph: #24

Transportation Technology No. 98138

Date Taken: September 9, 1998

Description of Subject: Engine Compartment

Note: 2.5L fuel injected four cylinder engine.

Consulting Service

Transportation Technology

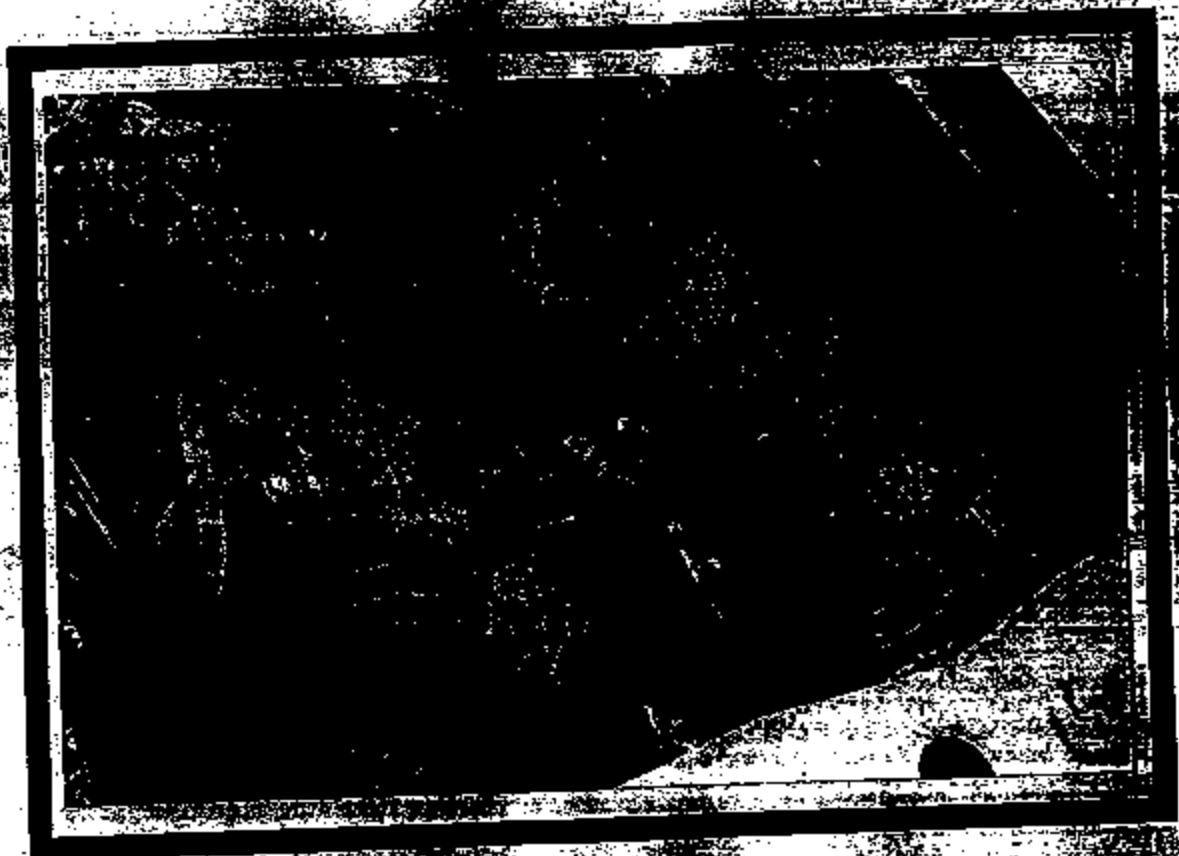
1184 Wind Hill Lane

Marietta, Ga. 30084

Telephone (770) 428-6173

Fax (770) 428-6173

PAGER (404) 342-7518



Photograph: #25

Transportation Technology No. 98138

Date Taken: September 9, 1998

Description of Subject: Engine Compartment (from top driver's side)

Note: Location of battery, power steering pump, and oxidation pattern.

Consulting Service

Transportation Technology

1184 Wind Hill Lane
Marietta, Ga. 30064
Telephone (770) 428-6173
Fax (770) 428-6173
FAXER (404) 342-7518



Photograph: #28

Transportation Technology No. 98138

Date Taken: September 9, 1998

Description of Subject: Engine Compartment (from front of engine)

Note: Location where positive battery cable contacted the power steering line.

ERG-085-LC-7803

Consulting Service

Transportation Technology

1184 Wind Hill Lane
Marietta, Ga. 30064

Telephone (770) 428-6173

Fax (770) 428-6173

PAGER (404) 342-7518



Photograph: #27

Transportation Technology No. 98138

Date Taken: September 9, 1996

Description of Subject: Battery Cable

Note: Melted and beaded copper sections of the battery cable.

EA05-035-LC-7808

Consulting Service

Transportation Technology

1184 Wind Hill Lane

Marletta, Ga. 30064

Telephone (770) 426-6173

Fax (770) 426-6173

PAGER (404) 342-7518



Photograph: #30

Transportation Technology No. 98138

Date Taken: September 9, 1998

Description of Subject: Battery Cable And Power Steering Line

Note: Location of electrical short

EA85-805-LC-7087

Consulting Service

Transportation Technology

1184 Wind Hill Lane
Marietta, Ga. 30064

Telephone (770) 426-6173

Fax (770) 426-6173

PAGER (404) 342-7618



Photograph: #31

Transportation Technology No. 98134

Date Taken: September 9, 1998

Description of Subject: Engine (front side)

Note: Deformed section of the engine oil pan.

ENG-983-LC-7608

Consulting Service

Transportation Technology

1184 Wind Hill Lane
Marietta, Ga. 30064
Telephone (770) 426-8173
Fax (770) 426-8173
PAGER (404) 342-7518



Photograph: #19

Transportation Technology No. 98138

Date Taken: September 9, 1998

Description of Subject: Undercarriage (passenger's side)

Note: Oxidation pattern on top of passenger's side frame rail.

Consulting Service

Transportation Technology

1184 Wind Hill Lane
Marietta, Ga. 30064
Telephone (770) 426-6173
Fax (770) 426-6173
PAGER (770) 426-7518



Photograph: #20 Transportation Technology No. 98138
Date Taken: September 9, 1998
Description of Subject: Passenger's Side Front Suspension

Note: Sway bar bushing consumed.

EA05-885-LC-7818

Consulting Services
Transportation Technology

1184 Wind Hill Lane
Marietta, Ga. 30064
Telephone (770) 426-6173
Fax (770) 426-6173
PAGE (00) 342-7518



Photograph: #21 Transportation Technology No. 98138

Date Taken: September 9, 1998

Description of Subject: Undercarriage (front suspension both sides)

Note: Oxidation pattern on driver's side extends to lower control arm. Oxidation pattern on the passenger's side does not extend to lower control arm.

Transportation Technology

TRANSPORTATION TECHNOLOGY
MONTICELLO, IDAHO 83402

Phone (208) 322-5173

Fax (208) 322-5173

PAGER (208) 322-7518



Photograph: #22

Transportation Technology No. 98138

Date Taken: September 9, 1998

Description of Subject: Undercarriage (mid-ship area)

Note: Components in the mid ship area were not involved in the fire.

Consulting Service

Transportation Technology

1302 W. Peachtree Street
Marietta, GA 30064

Telephone (770) 426-6173

Fax (770) 426-6173

PAGER (404) 342-7518



Photograph: #23

Transportation Technology No. 98135

Date Taken: September 9, 1998

Description of Subject: Undercarriage (rear of the vehicle)

Note: Components at rear of the vehicle were not involved.

Transportation Technology

1104 Wind Hill Lane
Marietta, Ga. 30064
Telephone (770) 426-6173
Fax (770) 426-6173
PAGER (404) 342-7518



Photograph: #16 Transportation Technology No. 98138
Date Taken: September 9, 1998
Description of Subject: Underside of Vehicle (driver's side front)

Note: Oxidation pattern, consumed section of power steering hose, and melted power steering pump bracket.

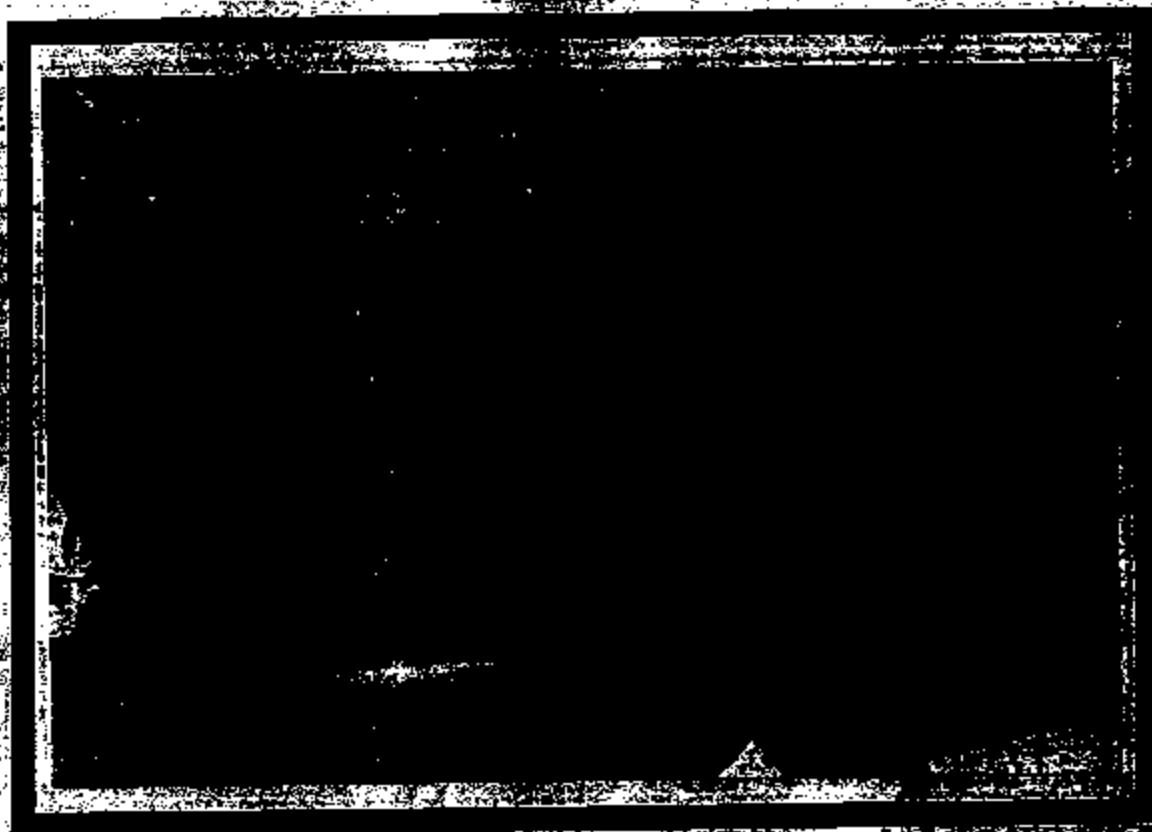
Transportation Technology

1184 W. 11th Lane
Marietta, GA 30064

Telephone (770) 428-6173

Fax (770) 428-6173

PAGER (404) 342-7618



Photograph: #17

Transportation Technology No. 98138

Date Taken: September 9, 1998

Description of Subject: Undercarriage

Note: Soot deposits on transmission and engine surrounding the oxidation pattern. Also note: both lower control arm bushings were consumed.

Transportation Technology

1830 Windward Lane
Marietta, GA 30064
Telephone (770) 426-6173
Fax (770) 426-6173
PAGER (404) 342-7518



Photograph: #18

Transportation Technology No. 98138

Date Taken: September 9, 1998

Description of Subject: Undercarriage (driver's side)

Note: Oxidation pattern extending from lower portion of rocker panel.

Transportation Technology

1184 W. ...
Marietta, GA 30064
Telephone (770) 525-6173
Fax (770) 525-6173
PAGER (404) 542-7618



Photograph: #13 Transportation Technology No. 98138
Date Taken: September 9, 1998
Description of Subject: Undercarriage (driver's side front)

Note: Sway bar bushing consumed.

Transportation Technology

1184 W. Highway 100
Marietta, GA 30064
Telephone (770) 425-5173
Fax (770) 425-5173
PAGER (404) 342-7518



Photograph: #14 Transportation Technology No. 98138
Date Taken: September 9, 1998
Description of Subject: Undercarriage (driver's side front)

Note: Oxidation pattern extending inward to power steering gear.

Transportation Technology

1384 Wind Hill Lane
Marietta, Ga. 30064
Telephone (770) 426-6173
Fax (770) 426-6173
PAGER (404) 342-7518



Photograph: #15 Transportation Technology No. 98138
Date Taken: September 9, 1998
Description of Subject: Drivers Side (front lower)

Note: Remains of power steering hoses.

Consulting Service

Transportation Technology

1184 Wind Hill Lane
Marietta, Ga. 30064

Telephone (770) 428-6173

Fax (770) 428-6173

PAGER (404) 342-7618



Photograph: #5

Date Taken: September 9, 1998

Description of Subject:

Cargo Area

Transportation Technology No. 98138

Note: Remains of aluminum hood.

BR05-005-LC-7828

Transportation Technology

114 Wind Hill Drive
Marietta, Ga. 30064
Telephone (770) 426-6173
Fax (770) 426-6173
PAGER (404) 342-7518



Photograph: #6 Transportation Technology No. 98738
Date Taken: September 9, 1998
Description of Subject: Engine Compartment
Note: Hood remains placed on top of engine compartment.

Transportation Technology

1181 West Highway 100
Marietta, GA 30064

Telephone (770) 426-6173

Fax (770) 426-6173

PAGER (404) 342-7518



Photograph: #7

Transportation Technology No. 98138

Date Taken: September 9, 1998

Description of Subject: Driver's Side (front at hood panel)

Note: Burn through surrounding brake booster.

Transportation Technology

1184 Wind Hill Lane
Marietta, GA 30064
Telephone (770) 426-8173
Fax (770) 426-8173
PAGER (404) 342-7518



Photograph: #8 Transportation Technology No. 98138
Date Taken: September 9, 1998
Description of Subject: Passenger's Side (front at engine compartment)
Note: Extensive fire damage located beneath the void area of the hood.

ERG-005-LC-7523

Transportation Technology

1184 Wind Hill Lane
Marietta, Ga. 30064
Telephone (770) 426-6173
Fax (770) 426-6173
PAGER (404) 342-7518



Photograph: #9 Transportation Technology No. 98138
Date Taken: September 9, 1998
Description of Subject: Firewall (passenger's side)
Note: Opening into passenger's compartment.

ER03-D05-LC-7824

Transportation Technology

1184 W. ...
Marietta, GA 30064
Telephone (770) 426-6173
Fax (770) 426-6173
PAGER (404) 342-7518



Photograph: #10 Transportation Technology No. 98138
Date Taken: September 8, 1998
Description of Subject: Engine Compartment (front)
Note: Radiator and condenser were consumed.

Consulting Services

Transportation Technology

1384 Wind Hill Road
Marietta, Ga 30064

Telephone (770) 426-6173

Fax (770) 426-6173

PAGER (404) 342-7518



Photograph: #11

Transportation Technology No. 98138

Date Taken: September 9, 1998

Description of Subject: Front Of Vehicle (at core support)

Note: Oxidation pattern on driver's side front frame rail.

Consulting Service

Transportation Technology

1122 Windmill Lane
Marietta, Ga. 30064

Telephone (770) 426-6173

Fax (770) 426-6173

PAGER (404) 342-7518



Photograph: #12

Transportation Technology No. 98138

Date Taken: September 9, 1998

Description of Subject: Vehicle

Note: Elevated with a fork lift to examine undercarriage.

Note: Remains of seat covering and upholstery.

Transportation Technology



Photograph: #3

Transportation Technology No. 98138

Date Taken: September 9, 1998

Description of Subject: Interior

Note: Seat cushioning and upholstery remains.

EA85-885-LC-7829

Transportation Technology



Photograph: #2 Transportation Technology No. 98138

Date Taken: September 9, 1998

Description of Subject: Exterior (driver's side)

Note: Burn patterns extending from leading edge of front fender to mid section of door.

EROS-885-LC-7838

TRANSPORTATION TECHNOLOGY

MONTHLY JOURNAL

OF THE

AMERICAN SOCIETY OF

TRANSPORTATION ENGINEERS



Photograph: #1 Transportation Technology No. 98138

Date Taken: September 9, 1998

Description of Subject: 1991 Ford Ranger (front)

Note: Extent of engine compartment air damage.

Consulting Service

Transportation Technology

1184 Wind Hill Lane
Marietta, Ga. 30064
Telephone (770) 426-6173
Fax (770) 426-6173
PAGER (404) 342-7518

CASE 98138

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Consulting Service

Transportation Technology

1184 Wind Hill Lane
Marietta, Ga. 30064
Telephone (770) 426-6173
Fax (770) 426-6173
PAGER (404) 342-7518

1.0 ASSIGNMENT

1.1 Client:

State Farm Insurance Company

1.2 Subject:

1998 Ford Ranger

Ser# 1FTYR14C9W

Mileage # could not determine

1.3 Location:

Sadisco North

Black Acre Trail

Acworth, GA

1.4 Purpose:

Determine cause of fire.

1.5 Date of Inspection: September 8, 1998

2.0 Participating Personnel

2.1 Investigator:

Michael E. Bresnock- Consultant

Transportation Technology

Consulting Service

Transportation Technology

1184 Wind Hill Lane
Marietta, Ga. 30064
Telephone (770) 426-6173
Fax (770) 426-6173
PAGER (404) 342-7518

3.0 EXAMINATION OF VEHICLE

3.1 Subject vehicle was involved in a fire loss on August 31, 1998. It is our understanding that the vehicle was in operation when the fire was discovered. Information obtained from State Farm Insurance Company indicated the fire was first noticed on the operator's side of the engine compartment.

3.2 At the time of our investigation the vehicle was situated in stall number #4205 at Sadlaco Salvage Disposal located in Kennesaw, Georgia. A visual inspection showed extensive engine compartment fire damage (photo #1). A view from the driver's side shows exterior burn patterns extending from the leading edge of the front fender to the mid-section of the door (photo #2). Interior fire damage was moderate. Partial remains of the seat cushioning and upholstery material were visible (photo #3, #4). The remains of the vehicle's aluminum hood were found in the cargo area (photo #5). The hood remains were positioned over the engine compartment (photo #6). Extensive fire damage was located beneath the void areas

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of the hood (photo #7, #8). An area on the passenger's side firewall, normally occupied by the heater box, created an access opening into the passenger's compartment (photo #9). The radiator and air conditioning condenser, mounted at the front of the engine compartment were consumed (photo #10). An oxidation pattern, visible through the core support, occupied an area on the driver's side front frame rail (photo #11).

3.3 The vehicle was elevated to inspect the undercarriage damage and evaluate the oxidation pattern (photo #12). The oxidation pattern on the driver's side frame rail extended to the suspension. The driver's side front sway bar bushing was consumed (photo #13). The oxidation pattern extended inward to the power steering gear (photo #14). The flexible rubber sections of power steering hoses were consumed (photo #15). The aluminum power steering pump bracket, located directly above the power steering hose remains, was partially melted (photo #16). Soot deposits surrounded the oxidation pattern (photo #17). An examination of the

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undercarriage also showed oxidation patterns extending from the lower driver's side rocker panel (photo #18).

3.4 An examination of the passenger's side showed some oxidation on the top side of the frame rail (photo #19). The sway bar bushing on the passenger's side was also consumed (photo #20). Unlike the driver's side, the oxidation patterns on the passenger's side did not extend to the lower control arm (photo #21). Components in the midship and rear of the vehicle were not involved in the fire (photo #22, #23).

3.5 The vehicle was equipped with a 2.5L fuel injected four cylinder engine (photo #24). The battery was located on the driver's side of the engine compartment, adjacent to the power steering pump, and directly above the oxidation pattern (photo #25). Electrical fault activity was noted on one section of the positive battery cable where it contacted the power steering line (photo #26). Magnified views of the battery cable show copper melting and beading (photos #27, #28, #29, #30). During

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an inspection of the engine oil pan deformity was noted (photo #31). A socket was placed on the balancer retaining nut and the engine was rotated one complete revolution. There were no irregularities which would have indicated the engine was seized.

4.0 CONCLUSIONS

4.1 It is our opinion that the insured's vehicle fire originated on the driver's side front corner of the engine compartment. The fire spread through the engine compartment and entered the interior through an opening in the firewall. Oxidation patterns on the driver's side frame rail and suspension coupled with the consumed sections of the power steering hose and the fire involved power steering fluid. The shortened battery cable is the proximate cause of the fire because it would have provided the heat necessary for combustion.



CRASH Unit
State Farm Insurance Companies
One State Farm Plaza A-3
Bloomington, Illinois 61710
Hot Line: (309) 766-1992
FAX: (309) 766-8692

11/20/98

Reference Claim
Number:

To:
Location:
Phone Number:
Fax Number:

MARIETTA, GA

From:

Joseph C Morris
(309) 766-1808

Remarks:

Garry, attached is Recall 87V186 as we discussed. Also attached are suggested handling instructions and Ford sub address. Any questions, please call me. ... Joe

Number of pages Transmitted (including this page): 7

NOTICE

This cover sheet and the materials contained in this packet are confidential and for internal State Farm use ONLY. This information shall not be reproduced and/or distributed to any person, firm or entity without first consulting with the C.R.A.S.H. unit.

Technical material is provided for your information only.
Proper interpretation is the responsibility of the addressee.

2810262-AC4205

CLAIM PHOTO TRANSMITTAL

Claim
Number

Scene Location/View:

Scene Location/View:



Scene Location/View:

Scene Location/View:

Rep: Gary Dobson (Dalk Road)

CCC request # 22677193

Photos Taken By: Billy Bennett

Time Taken:

Date: 9/4/98

If Vehicle Photos:

Yr. & Model: 1998 Ford Ranger Extended Cab

Vehicle Owner:

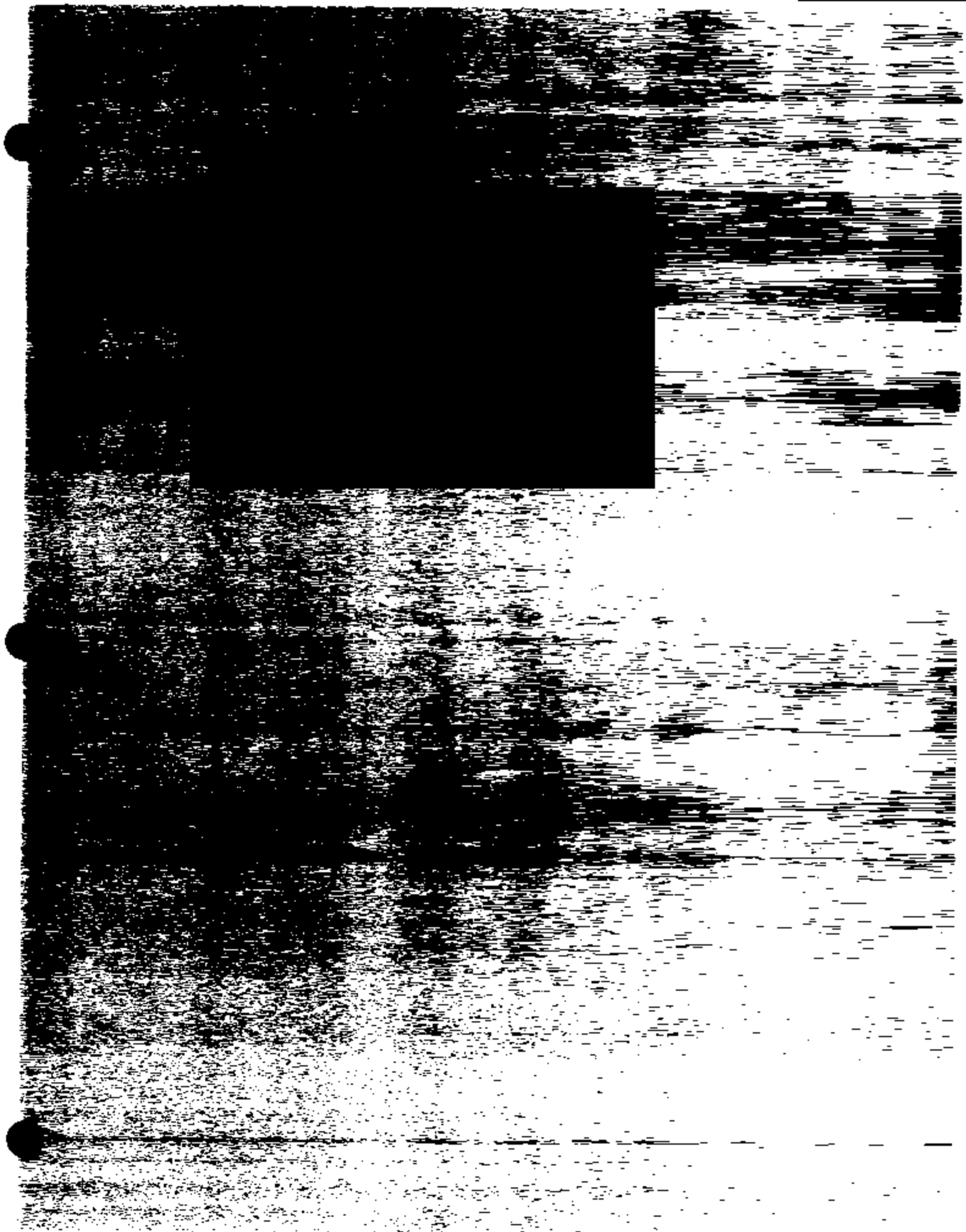
Sedisco North

Is this the Insured Vehicle ☒ or Claimant Vehicle ☐ Place where

160-6476-6 Rev. 7-98 Printed in U.S.A.

Vehicle Photos taken:

EAD5-285-LC-7838





SOUTH CAROLINA FARM BUREAU INSURANCE COMPANIES

South Carolina Farm Bureau Insurance Agency / South Carolina Farm Bureau Mutual Insurance Company

Southern Farm Bureau Life Insurance Company / Southern Farm Bureau Casualty Insurance Company

POST OFFICE BOX 2124 • WEST COLUMBIA, SOUTH CAROLINA 29171-2124 • (803) 796-6700

3 2005

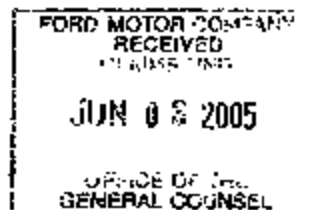
June 2, 2005

Sent via Fax (313) 845-4089

CERTIFIED MAIL - RETURNED RECEIPT REQUESTED

Ms. Shawn Norton
Ford Motor Company
800 Parklane Towers West
Three Parklane Boulevard
Dearborn, MI 48126

RE: SCFB Claim No: [REDACTED]
SCFB Insured: [REDACTED]
Date of Accident: May 4, 2005



Dear Ms. Norton:

The purpose of this letter is to advise of SC Farm Bureau Insurance Companies intent to pursue a subrogated claim directly against Ford Motor Company regarding an accident/incident that occurred on May 4, 2005.

The reason for placing you on notice in this fashion is that our policyholder suffered a loss to their 1998 Ford Ranger VIN 1FTYR10C1WU [REDACTED]. The initial inspection shows the fire originated in the engine compartment, and it may be a total loss. The vehicle is located at our salvage yard, which is Sedisco in Lexington, South Carolina.

We will continue to preserve the salvage in its present condition at this location for 15 days from the date of this letter to allow you the opportunity to inspect the vehicle accordingly. After the 15 days have passed and either you or another representative from Ford Motor Company fail to respond to this letter, we will dispose of the salvage without waiving any of our rights regarding spoliation of evidence if this matter must be litigated at a later date.

Please contact me in writing within 15 days from the date of this letter with your intent. I look forward to your reply with interest, as we are eager to either resolve this situation or move forward with litigation.

With kind regards,

Dwayne L. Smalls
Subrogation Supervisor
damalla@scfbins.com
803.936.4998

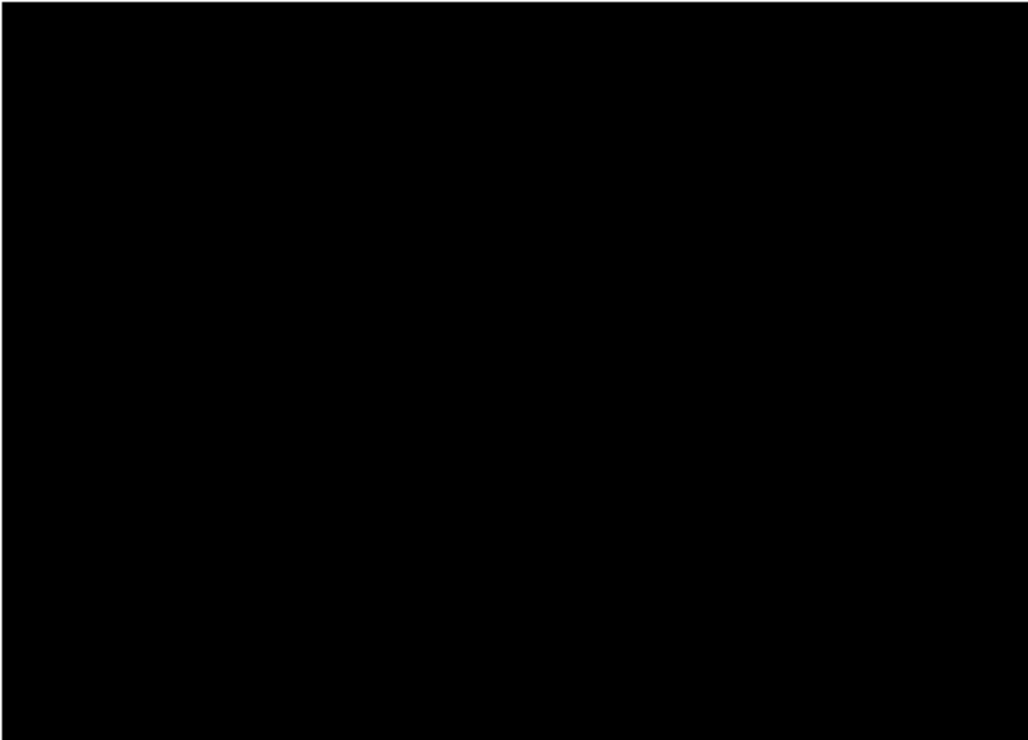
cc:

"HELPING YOU IS WHAT WE DO BEST"
www.scfbins.com

ER05-005-LC-7846

JUN 02 2005 13:48

PAGE 01



[REDACTED]
Cogan Station, Pennsylvania [REDACTED]
Plaintiffs

vs.

FORD MOTOR COMPANY
Suite 300, Parklane Towers West
Three Parklane Boulevard
Deerborn, Michigan 48126-2568
Defendant

IN THE COURT OF COMMON PLEAS
OF LYCOMING COUNTY
CIVIL ACTION - LAW
JURY TRIAL DEMANDED

No. 05-00174

COMPLAINT

NOW COME the plaintiffs, [REDACTED] his wife, by and through their counsel, [REDACTED] and hereby file this complaint against the defendant and in support thereof aver as follows:

1. Plaintiff [REDACTED] is an adult and competent individual residing at [REDACTED] [REDACTED] Lycoming County, Pennsylvania [REDACTED]
2. Plaintiff [REDACTED] is an adult and competent individual residing at [REDACTED] [REDACTED] Lycoming County, Pennsylvania [REDACTED]
3. The defendant, Ford Motor Company, is a business entity licensed to conduct business in the Commonwealth of Pennsylvania with a principal place of business at Parklane Towers West, Suite 300, Three Parklane Boulevard, Deerborn, Michigan 48126-2568.
4. At all times material and relevant hereto, the plaintiffs, [REDACTED] [REDACTED] Williamsport, Pennsylvania.
5. At all times material and relevant hereto, the plaintiffs, [REDACTED] [REDACTED] owned a 1999 Ford Explorer, Vehicle Identification No. 1FMDU34X4XU [REDACTED]

6. At all times material and relevant hereto, the plaintiffs, [REDACTED] Harris, did own a 2002 Ford F250 pickup truck, Vehicle Identification No. 1FPNX21L52 [REDACTED]

7. At all times material and relevant hereto, the plaintiffs [REDACTED] did own a detached single story cinder block garage measuring approximately 20 feet by 24 feet, located at 59 Grimesville Road, Williamsport, Pennsylvania.

8. At all times material and relevant hereto, plaintiff [REDACTED] did own a trailer which was parked in close proximity to the aforementioned garage.

9. On or about February 10, 2003, while plaintiffs' vehicles were parked in plaintiffs' garage, a fire originated from the plaintiffs' 1999 Ford Explorer, causing destruction of the plaintiffs' 1999 Ford Explorer, the 2002 Ford F250 pickup, plaintiffs' garage and contents contained therein.

10. The incident of February 10, 2003 was caused by the defective design and installation of a cable connecting the battery to the alternator of the 1999 Ford Explorer (hereinafter referred to as "the vehicle") as a result of which the plaintiffs sustained property damage in the amount of \$67,707.01, as follows:

- a) destruction of the 2002 Ford F250 pickup, \$29,041.55;
- b) destruction of the 1999 Ford Explorer, \$16,758.48;
- c) destruction of garages, \$16,509.28;
- d) destruction of contents in garage, \$5,027.76; and
- e) damage to awning on trailer, 369.94.

COUNT I

Plaintiffs vs. Defendant

Strict Products Liability

11. The plaintiffs incorporate Paragraphs 1 through 10 of their complaint as though same were fully set forth at length herein.

12. The defendant, Ford Motor Company, is liable on the basis of Section 402(a), Strict Products Liability.

13. The defendant, Ford Motor Company, designed, manufactured, assembled, constructed, fabricated, sold, distributed, and/or placed in the consumer market for sale, use, distribution and/or rental, to customers and use by public at large, including the plaintiffs herein, the vehicle in question, including the aforementioned cable as designed and installed, which was intended by the defendant to be used and was used by said customers in an about the Commonwealth of Pennsylvania.

14. The defendant knew or should have known that the aforesaid vehicle would be used by said customers, including the plaintiff, without being aware of the defective condition of said cable.

15. By placing said vehicle into the consumer market and furnishing same to customers and users, including the plaintiff herein, the defendant expressly and/or impliedly and/or by operation of law represented that its vehicle would be safely used for the purposes for which same was made, sold, leased, rented and intended.

16. The aforesaid vehicle, including the aforementioned cable as designed and installed, fabricated, manufactured, assembled, constructed, sold, distributed, delivered and/or placed in the market by the defendant, was unsafe for its intended use, in that the cable installation and design was defective in its design, fabrication, assembly, construction and/or manufacture and was unreasonably dangerous to the users thereof.

17. The aforesaid vehicle reached its users and consumers without substantial or any change in the condition in which it was designed, fabricated, manufactured, assembled, constructed, distributed, delivered and/or sold by the defendant.

18. The vehicle, as and when sold and distributed by the defendant, was in a defective condition unreasonably dangerous to the user or consumer and was dangerous in the normal and ordinary course of use, and the use to which the defendant could reasonably have expected the said product to be put and, but not limited to that:

- (a) the vehicle, including the aforementioned cable as designed and installed, was not accompanied by adequate warnings, instructions, information or notices in the proper forms to users and consumers, of the unreasonable and inherent dangers and defects attendant to even the careful, proper and reasonable use of the cable and/or other remedial measures necessary to render the cable safe for its intended use;
- (b) the vehicle, including the aforementioned cable as designed and installed, was not properly equipped so as prevent igniting the insulation and plastic protector within the cable;
- (c) after the sale, lease, distribution and delivery of the vehicle, including the aforementioned cable as designed and installed, and upon recognizing and/or believing in a position in which it should have recognized the dangers posed by the vehicle, including the aforementioned cable as designed and installed, the defendant failed to warn purchasers, renters, users and consumers of the attendant dangerous, and has also failed to take appropriate measures or provide adequate replacement and/or supplemental attachments or warning notices/labels, in an attempt to warn of, correct, or remediate the dangerous condition of the vehicle, including the aforementioned cable as designed and installed; and
- (d) defendant failed to provide proper and adequate notices, warnings, directions, information and instructions regarding the installation, use, maintenance, care and propensities of the vehicle, including the aforementioned cable as designed and installed, in question herein.

19. As a direct and proximate result of the aforesaid defects, the plaintiffs have suffered damages as set forth above in the amount of \$67,707.01.

20. Furthermore, as a direct and proximate result of the aforementioned negligence of the defendant, Ford Motor Company, the plaintiffs [REDACTED] have been, or will be, obliged to expend various sums of money and to pay expenses related to the costs of property damage.

WHEREFORE, plaintiffs [REDACTED] demand judgment in their favor and against defendant, Ford Motor Company, in an amount in excess of \$67,707.01, plus interest and costs, reasonable attorney's fees, and any other relief the court deems fair and proper.

COUNT II

Plaintiffs vs. Defendant

Negligence

21. The plaintiffs incorporate Paragraphs 1 through 20 of their complaint as though same were fully set forth at length herein.

22. Upon information and belief, the defendant made, constructed, designed, fabricated, assembled, manufactured, sold, distributed, conveyed and/or transferred the vehicle, including the aforementioned cable as designed and installed, in a negligent, careless and reckless manner in that the defendant, inter alia:

- (a) failed to properly warn or advise that the vehicle, including the aforementioned cable as designed and installed, should not be used in the condition in which it was sold by the defendant;
- (b) failed to properly warn or advise that the vehicle, including the aforementioned cable as designed and installed, should be made or rendered reasonably safe after its sale prior to use;
- (c) failed to place, affix, or provide adequate decals, notices, warnings or instructions on and/or for the vehicle, including the aforementioned cable as designed and installed, in question;
- (d) failed to properly warn or advise of the product-related hazards or dangers;
- (e) sold and distributed the said products of a defective design, manufacture, construction and assembly in a defective and hazardous condition;
- (f) failed to adequately warn or instruct concerning the dangerous and defective assembly, construction, manufacture, propensities and characteristics of the vehicle, including the aforementioned cable as designed and installed, when it knew or reasonably should have known that the vehicle, including the

aforementioned cable as designed and installed, would pose an unreasonable danger of injuries;

- (g) failed to properly sell and supply the said vehicle, including the aforementioned cable as designed and installed, in a safe condition;
- (h) failed to properly provide adequate information, instructions, warnings, decals and specifications in construction with the vehicle, including the aforementioned cable as designed and installed;
- (i) failed to properly test and inspect the vehicle, including the aforementioned cable as designed and installed, before selling and or distributing it;
- (j) failed to use due care in testing, inspection, sale, design, production, destruction, assembly, manufacture, distribution, and/or handling of the vehicle, including the aforementioned cable as designed and installed;
- (k) sold, manufactured, constructed, assembled, and/or distributed the said vehicle, including the aforementioned cable as designed and installed, which was properly designed, constructed, tested, assembled and/or manufactured;
- (l) sold, manufactured, constructed, assembled and/or distributed the said vehicle, including the aforementioned cable as designed and installed, which the defendant knew or should have known was defective and/or improperly and/or inadequately designed, inspected and tested;
- (m) sold, manufactured, constructed, assembled, and/or distributed a vehicle, including the aforementioned cable as designed and installed, which the defendant knew or should have known was unsafe for sale, distribution and use;
- (n) sold, manufactured, constructed, assembled and/or distributed a vehicle, including the aforementioned cable as designed and installed, which the defendant knew or should have known was unsafe for its foreseeable and intended use; and
- (o) failed to use due care in the design, promotion, sale and manufacture of the vehicle, including the aforementioned cable as designed and installed.

23. As a direct and proximate result of the aforesaid defects, the plaintiff has suffered property damage as set forth above, in an amount of \$67,707.01 as a result of fire due to the

defective manufacture of the cable causing the insulation and plastic protector of the cable to ignite.

24. Furthermore, as a direct and proximate result of the above-mentioned negligence of the defendant, Ford Motor Company, the plaintiffs, [REDACTED], have been, and will be obliged to expend various sums of money and to pay expenses related to the costs of the property damage.

WHEREFORE, plaintiffs [REDACTED] demand judgment in their favor and against defendant, Ford Motor Company, in an amount in excess of \$67,707.01, plus interest and costs, reasonable attorney's fees, and any other relief the court deems fair and proper.

COUNT III

Plaintiffs vs. Defendant

Breach of Warranties

25. The plaintiffs incorporate Paragraphs 1 through 24 of their complaint as though same were fully set forth at length herein.

26. At all times material hereto, it is believed and therefore averred, that the defendant knew and/or had reason to know and/or had knowledge and/or had actual and/or constructive notice, and reasonably should have and/or notice of the claimed hazard and defective condition of the vehicle, including the aforementioned cable as designed and installed.

27. The defendant was, at all times material hereto, a merchant/seller with respect to the vehicle, including the aforementioned cable as designed and installed, expressly and/or implied warranted to the users and consumers thereof that said products were merchantable and fit for the particular purpose for which they were required, intended, sold, and used.

28. The breaches of warranty by the defendant caused and contributed to and were a substantial factor in bringing about the property damages sustained by the plaintiffs, as set forth above.

29. The vehicle, including the aforementioned cable as designed and installed, was neither merchantable nor fit for the particular purpose for which it was required, intended, sold, distributed and used.

30. Reliance was placed upon the defendant to select and/or furnish a vehicle, including the aforementioned cable as designed and installed, for the proposed and foreseeable use of the plaintiffs, [REDACTED]

31. The vehicle, including the aforementioned cable as designed and installed, was not fit for the particular purpose for which it was purchased, sold, distributed, leased and used.

32. The defendant knew or had reason to know when it sold, distributed, and supplied the vehicle in question, including the aforementioned cable as designed and installed, the particular purposes for which the cable was required, intended, sold, leased and proposed for use.

33. As a direct and proximate result of the aforesaid defects, the plaintiff has suffered property damage as a result of fire damage due to the defective manufacture of the vehicle, including the aforementioned cable as designed and installed, in the 1999 Ford Explorer, causing the insulation and plastic protector of the cable to ignite causing the fire in the plaintiff's garage in an amount of \$67,707.01.

34. Furthermore, as a direct and proximate result of the above-mentioned negligence of the defendant, Ford Motor Company, the plaintiffs, [REDACTED] have been, or will be obliged, to expend various sums of money and to pay expenses related to the costs of property damage.

WHEREFORE, plaintiffs [REDACTED] his wife, demand judgment in their favor and against defendant, Ford Motor Company, in an amount in excess of \$67,707.01, plus interest and costs, and any other relief the court deems fair and proper.

Respectfully submitted,

ABRAHAMSEN, MORAN & CONABOY, P.C.



James J. Conaboy, Esquire
1006 Pittston Avenue
Scranton, Pennsylvania 18505
570/348-0200

VERIFICATION

We, [REDACTED] hereby verify that we are the plaintiffs herein, and that the statements contained in the foregoing "COMPLAINT" are true and correct to the best of our information, knowledge and belief, and that the statements are made subject to the penalties of 18 Pa. C.S. Section 4904 pertaining to unsworn falsification to authorities.

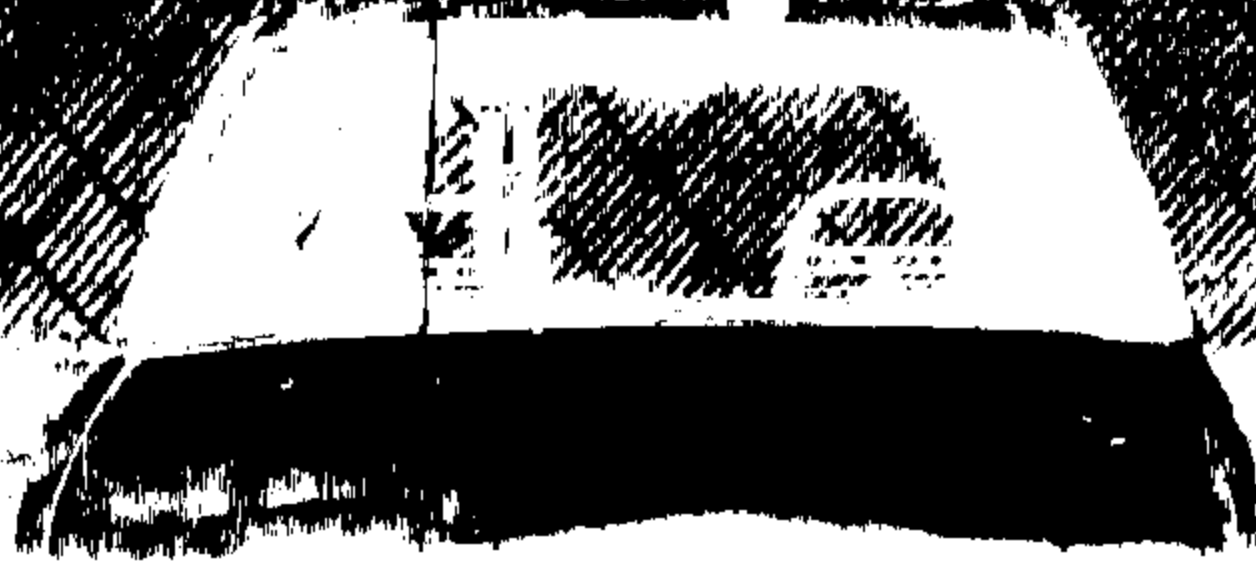
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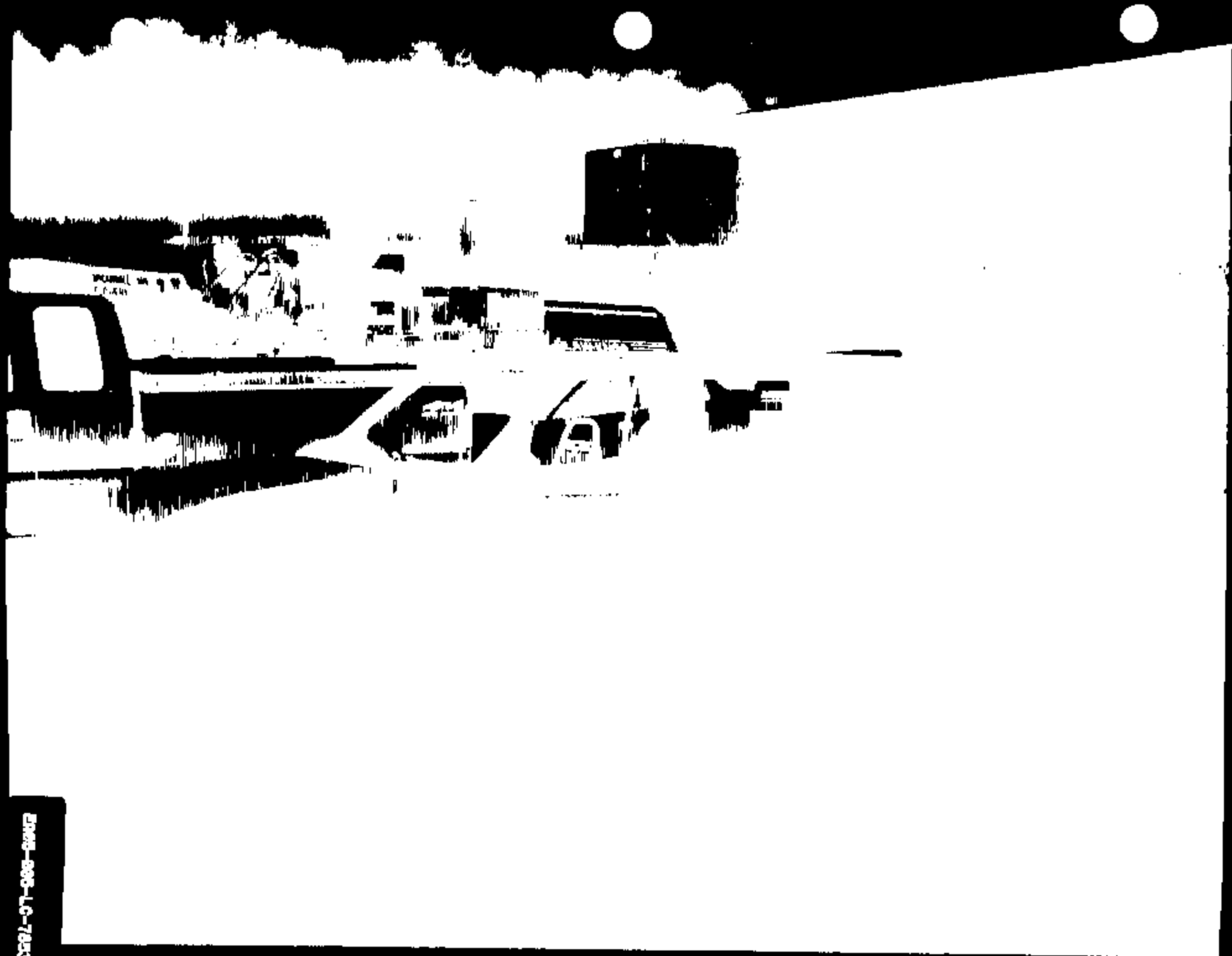
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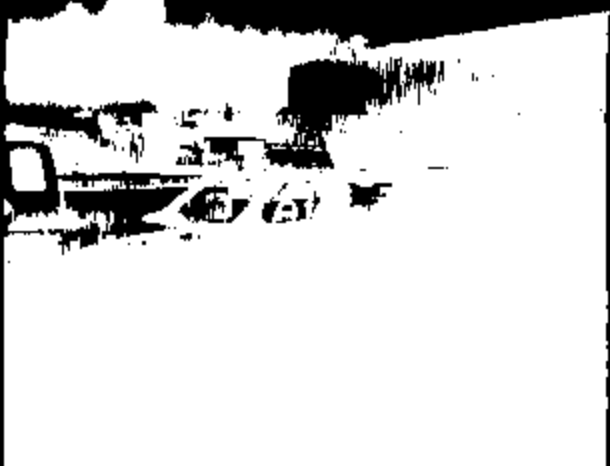


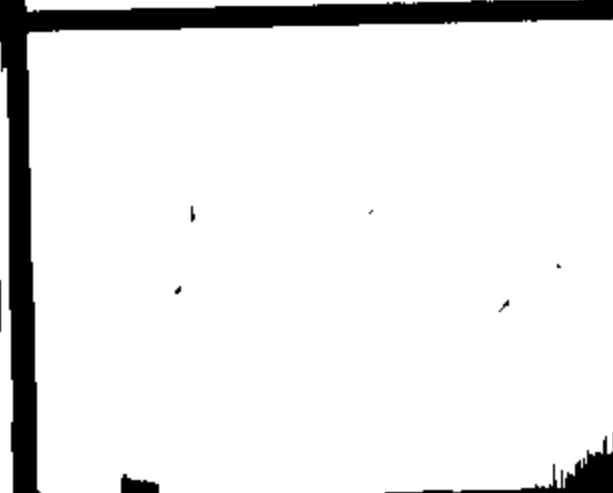
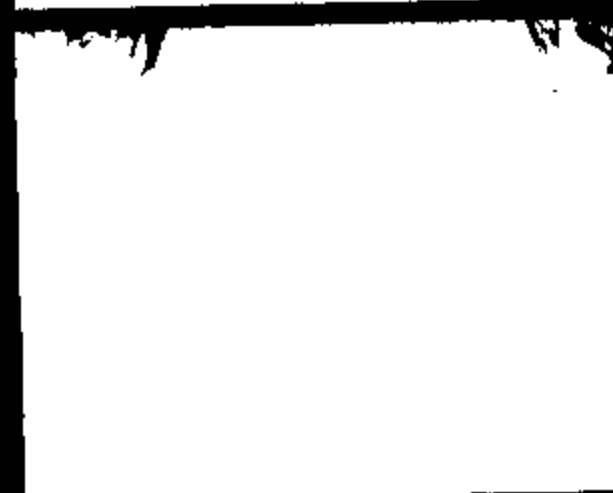
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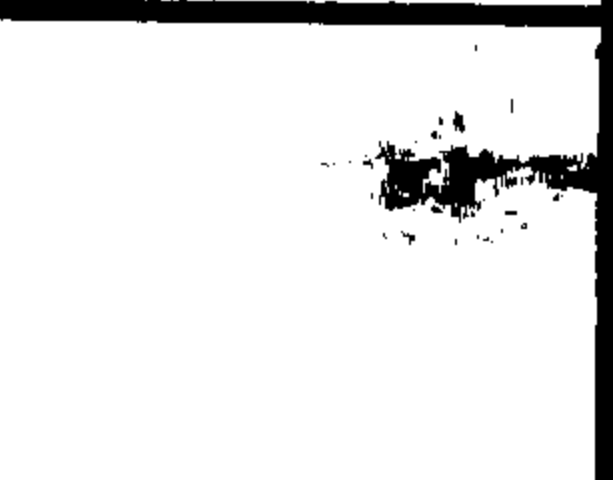
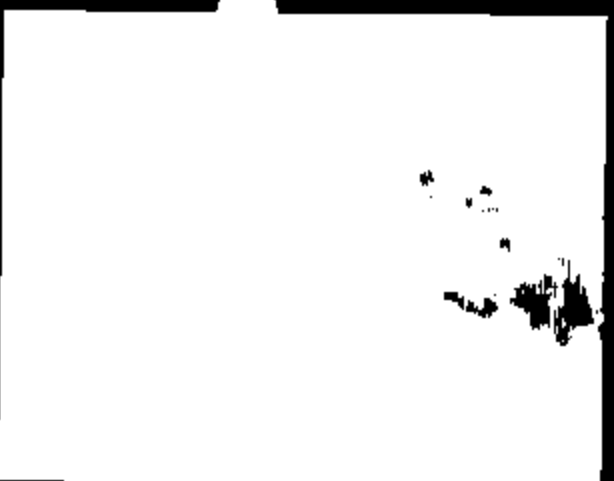


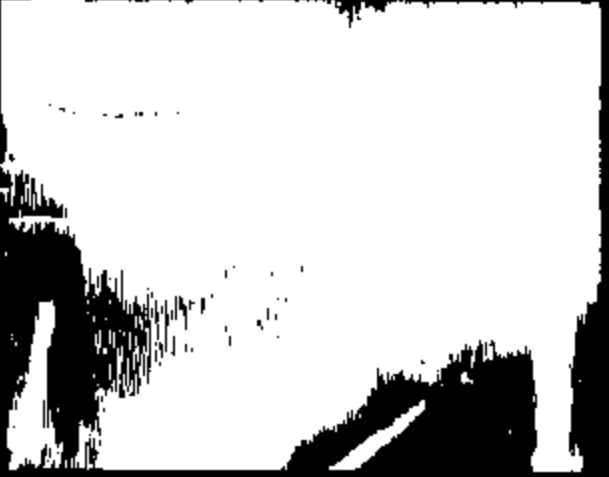
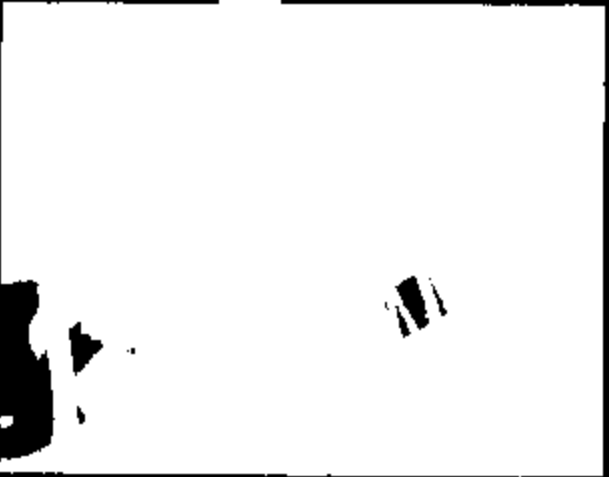
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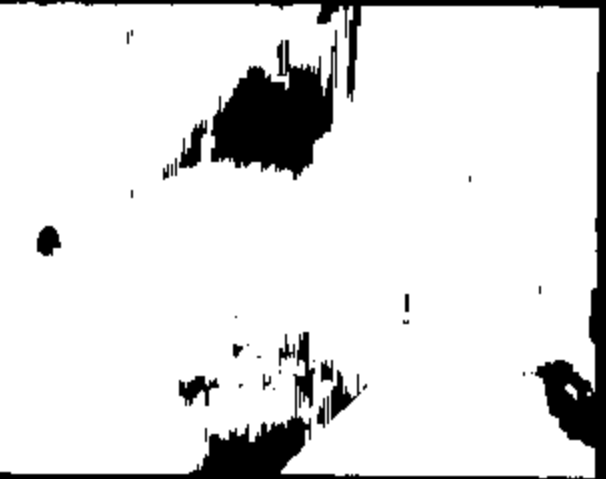
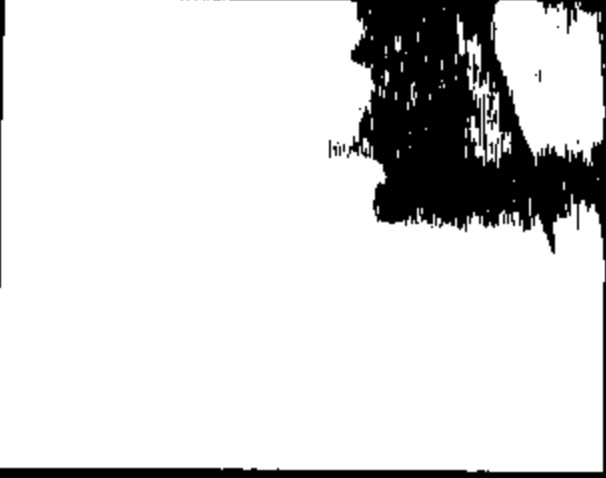
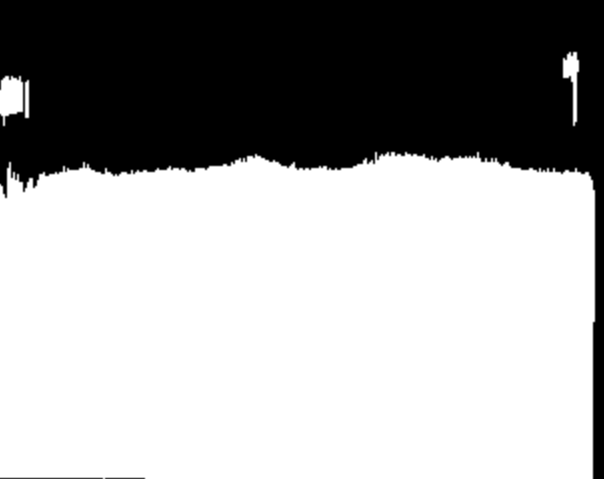
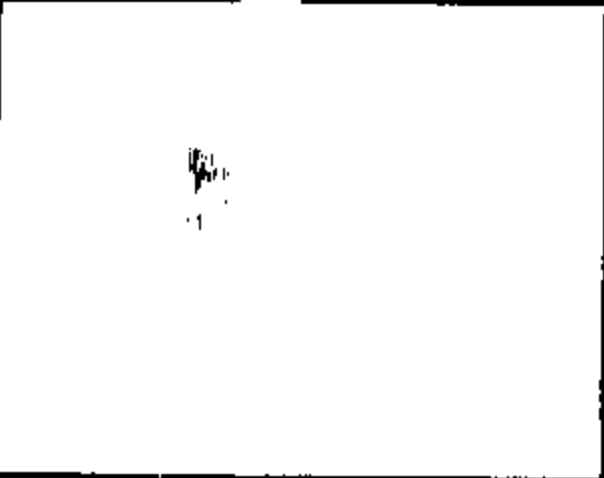


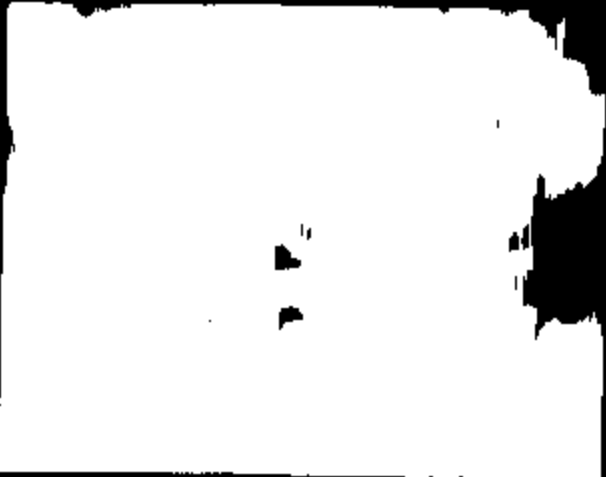
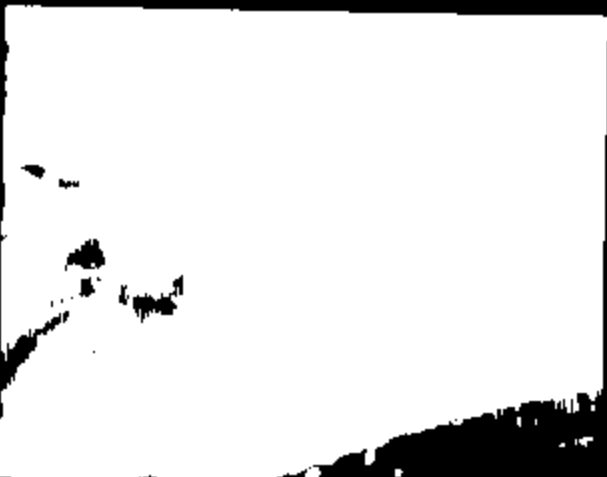
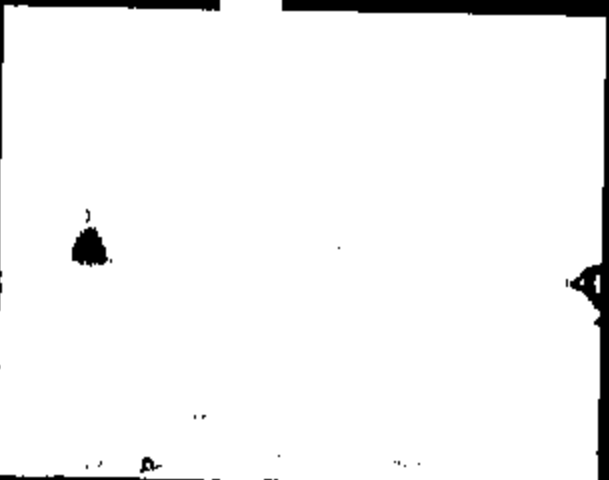


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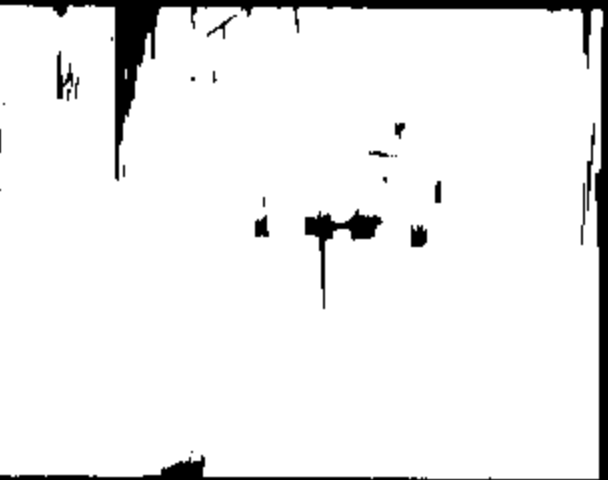
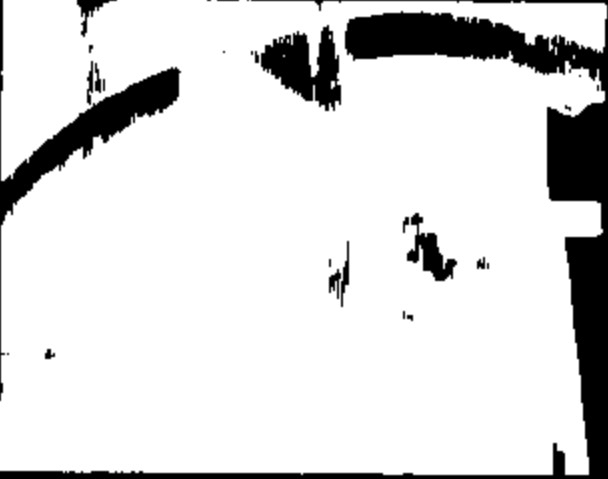
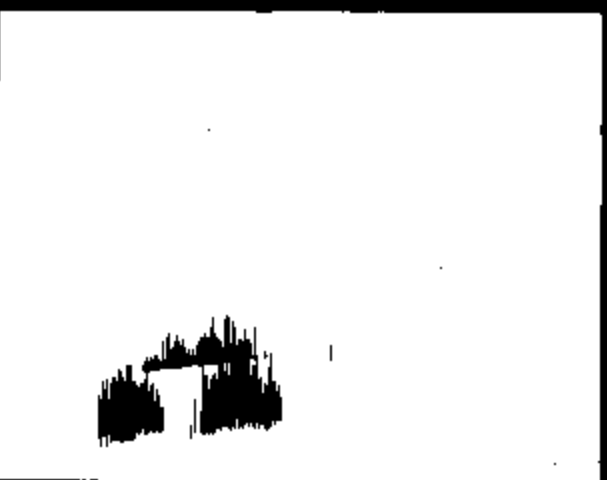
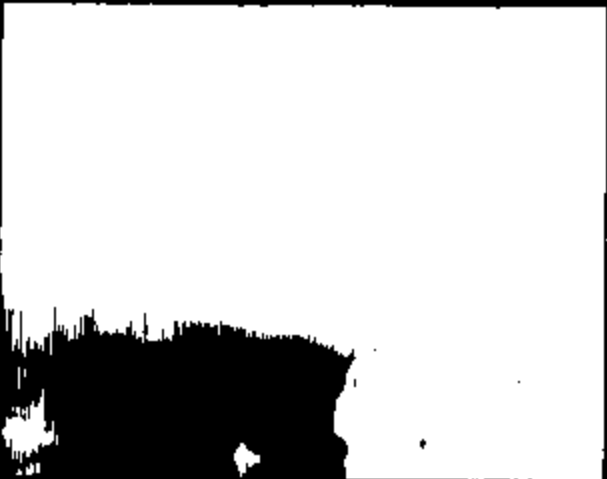
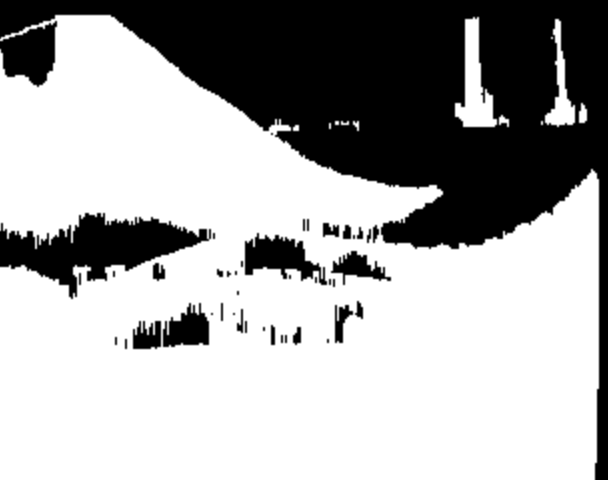
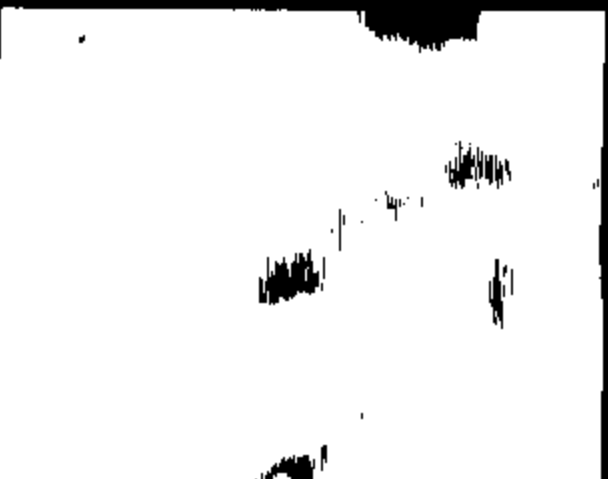
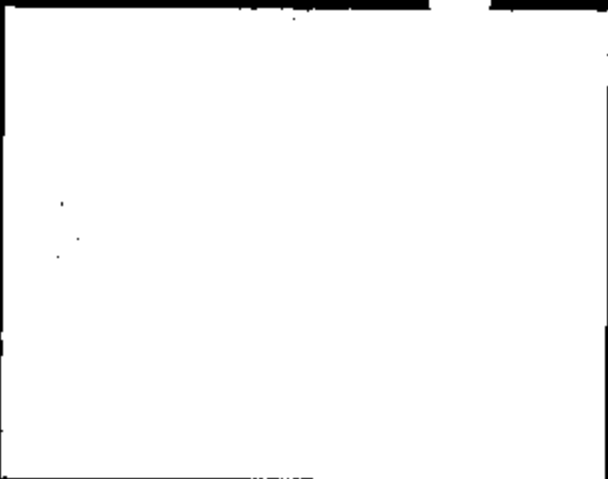


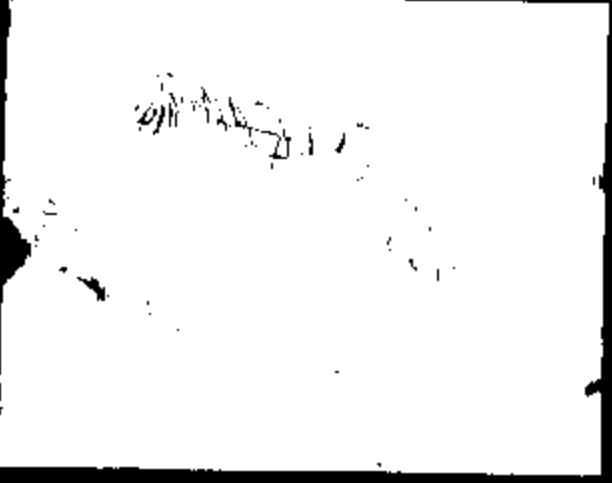
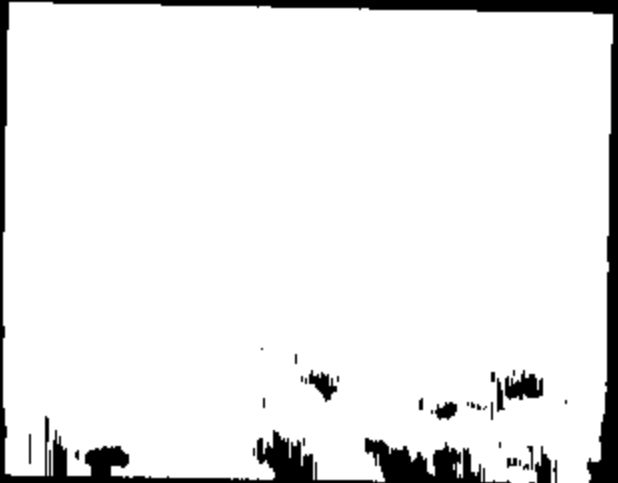
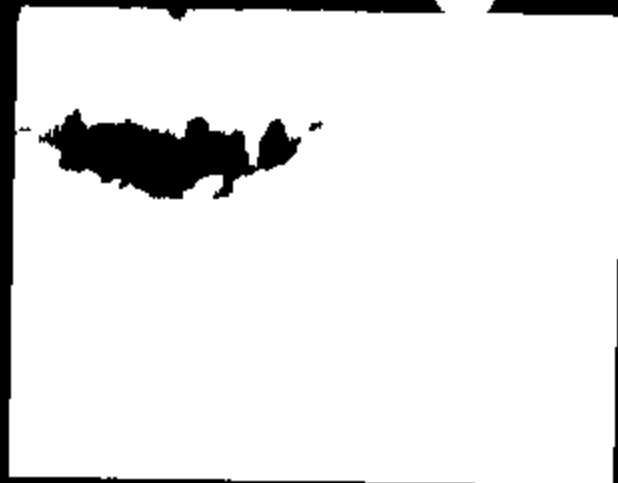


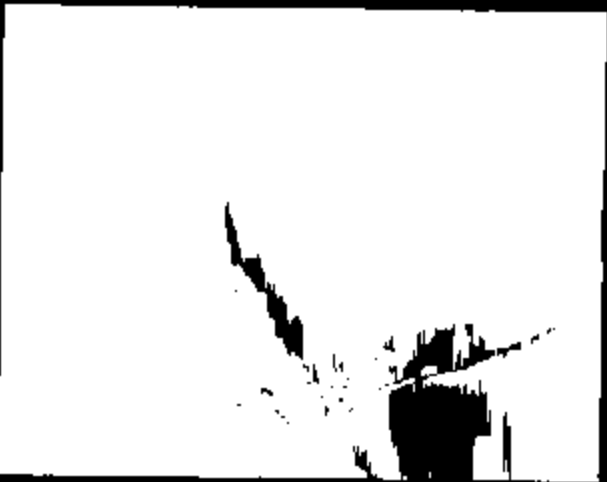


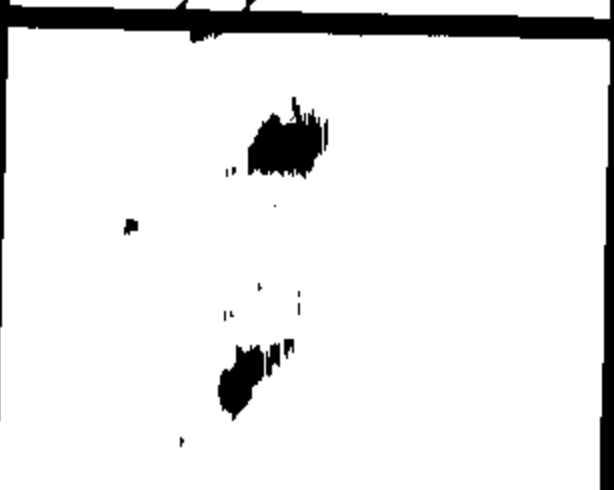
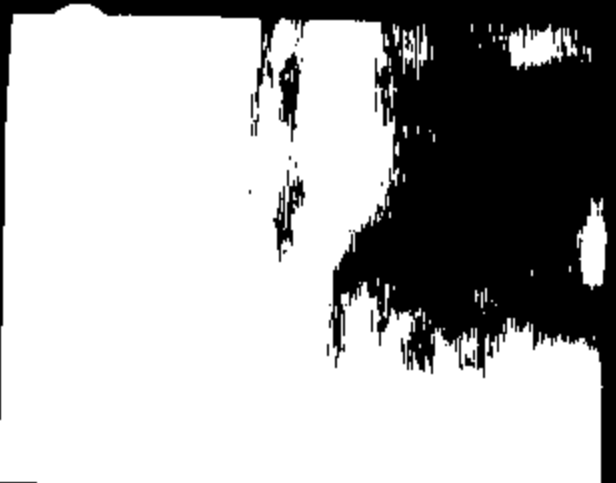


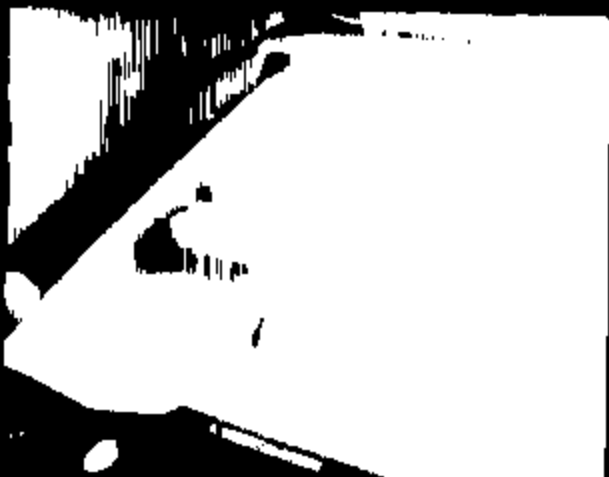
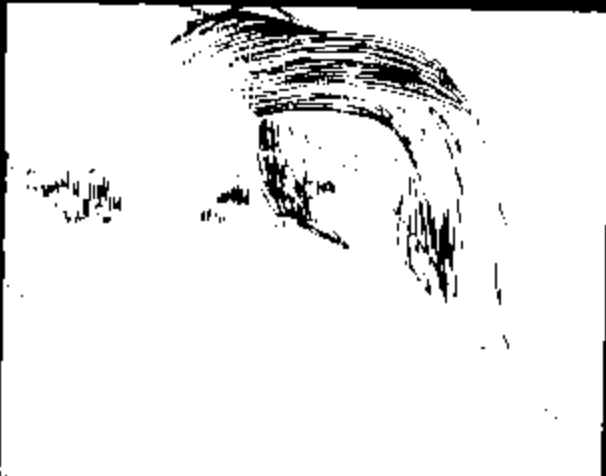
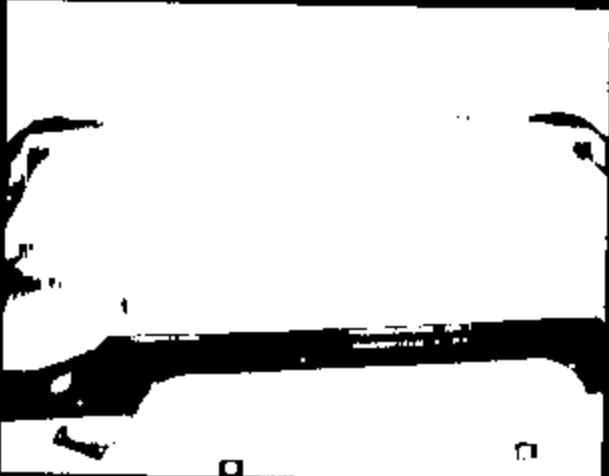
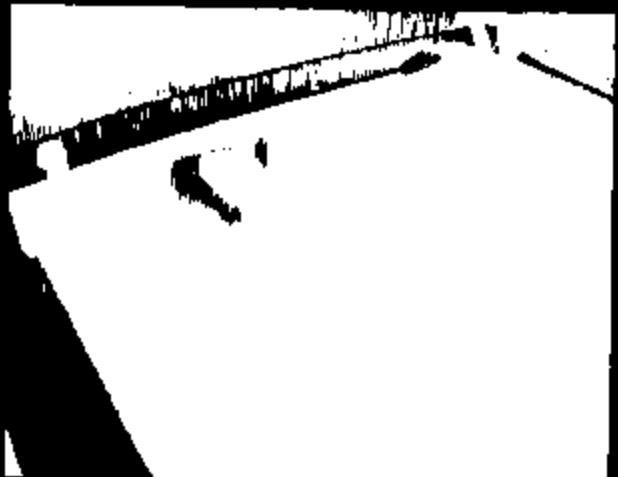
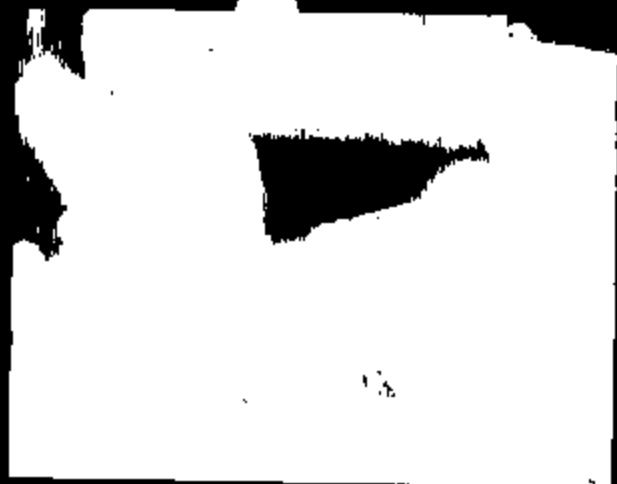












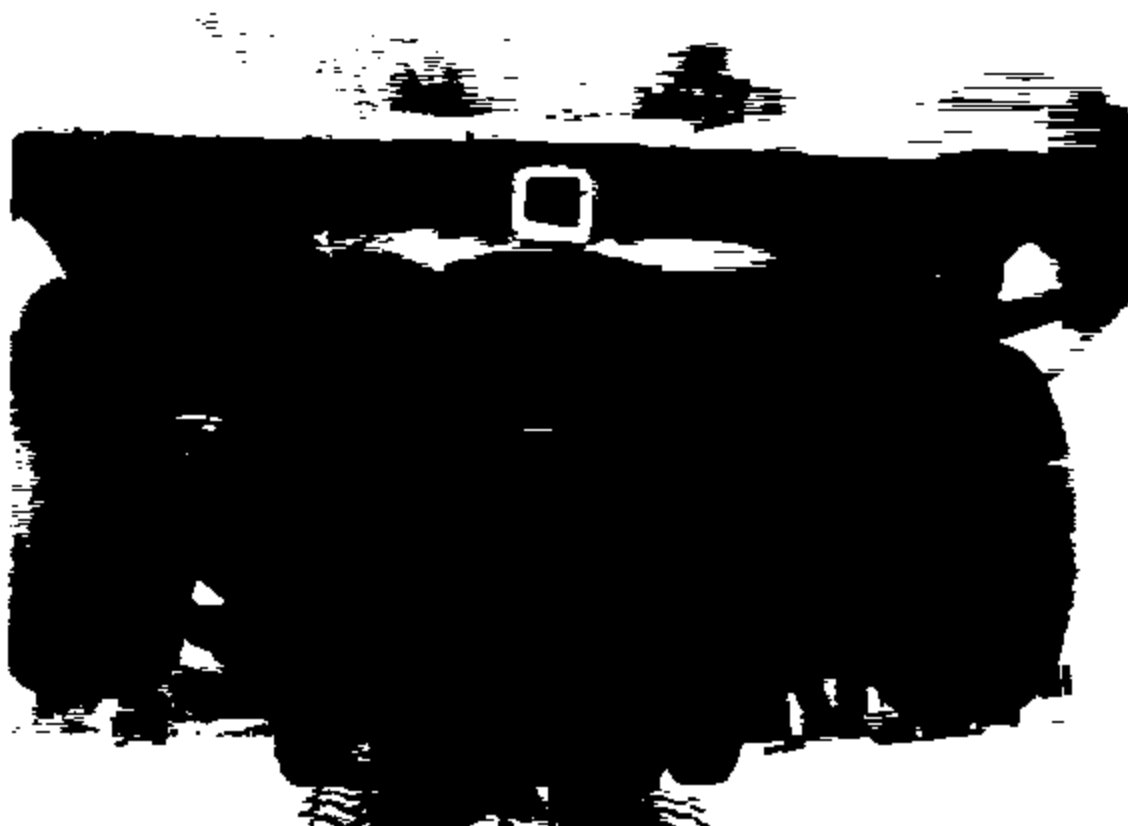


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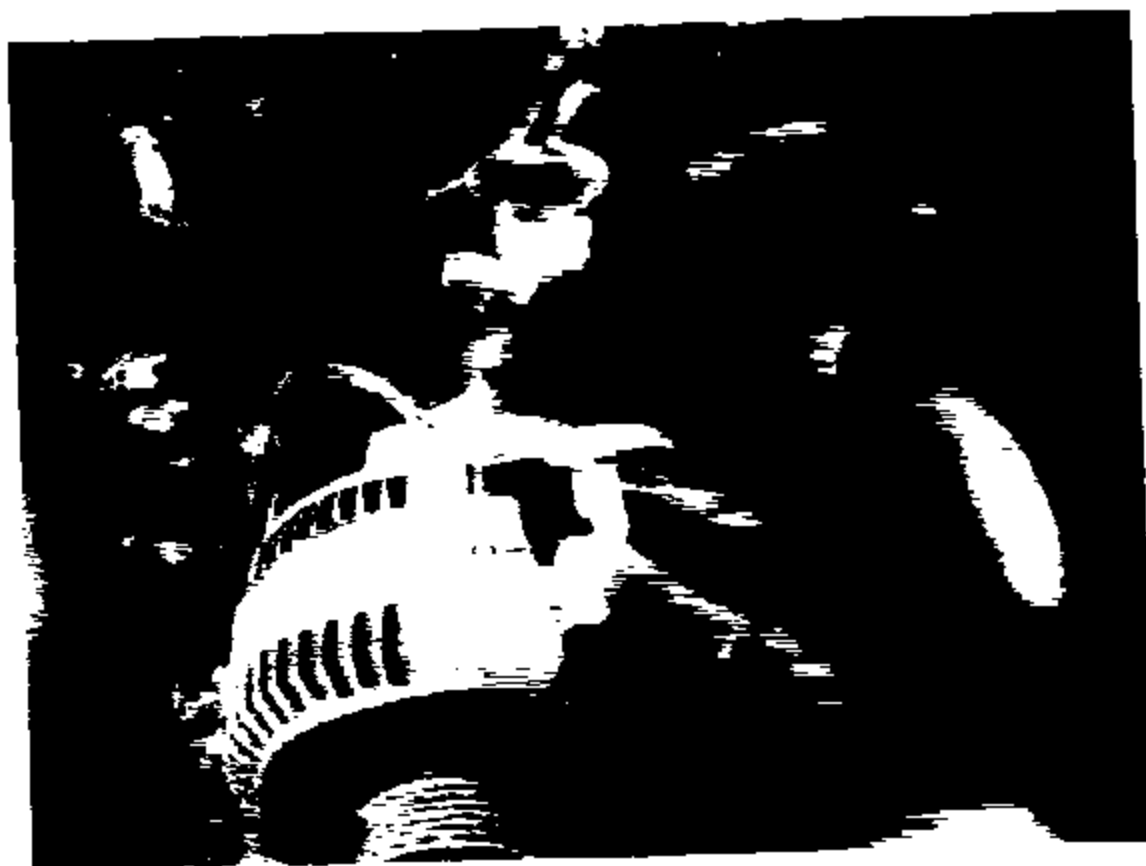


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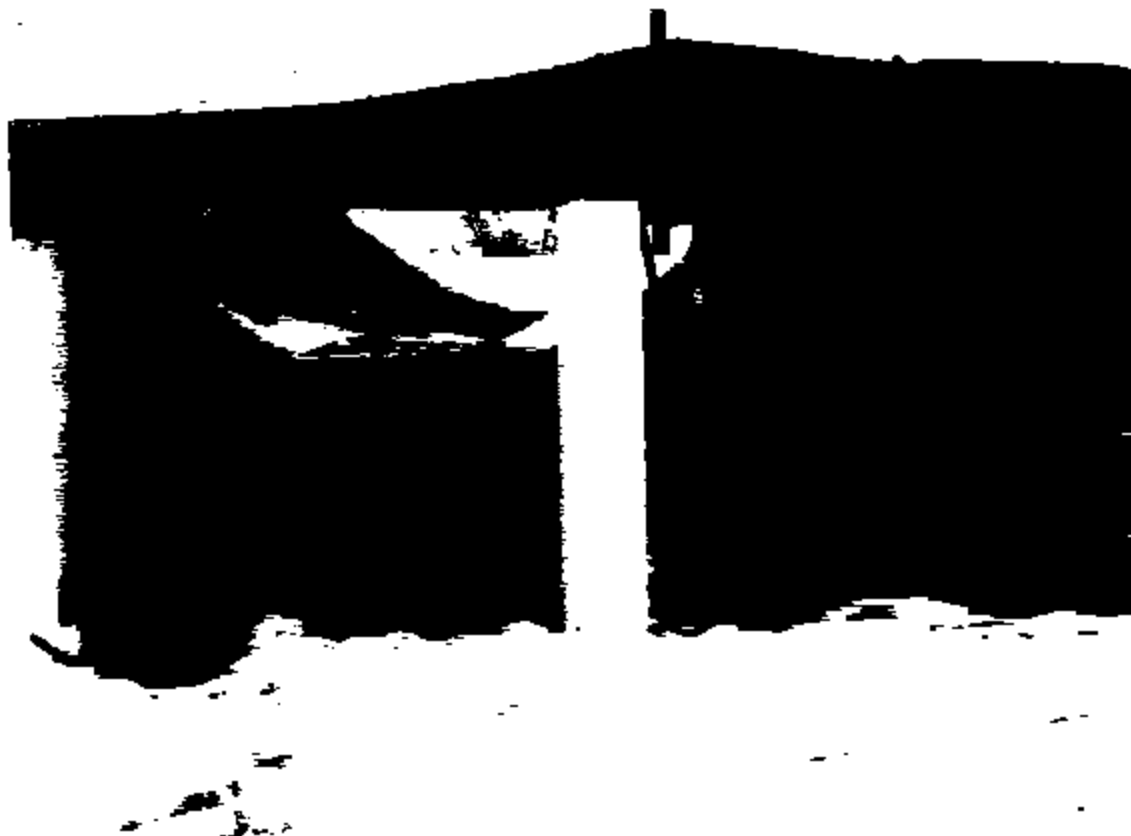


Photo # 1

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Photo # 2

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ER05-885-LC-7870



Photo # 3

RECEIVED

MAR 22 1968

U.S. DEPARTMENT OF JUSTICE
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Photo # 4

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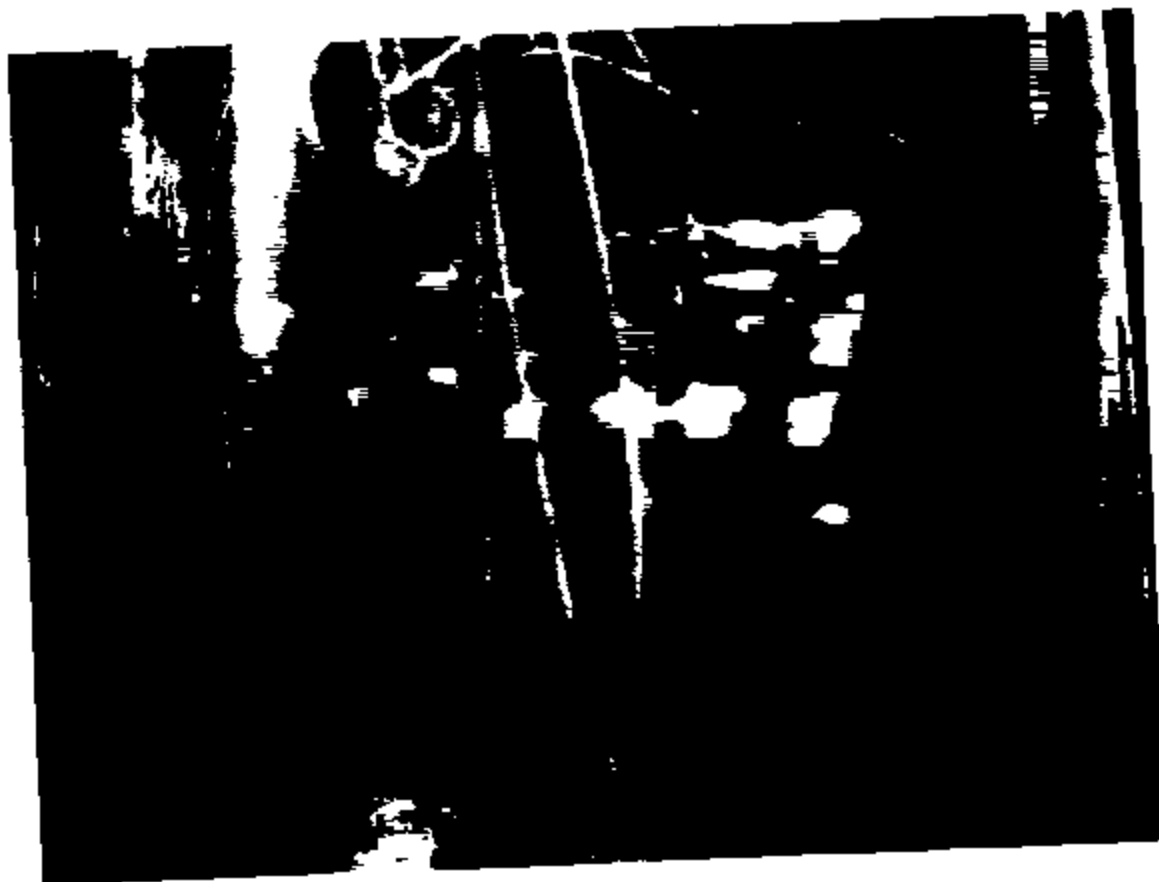


Photo # 5

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62-885-LC-7873



Photo # 6

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MAR 25 1964

U.S. AIR FORCE

ER05-005-LC-7874



Photo # 7

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2025-005-LC-7575



Photo # 8

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U.S. DEPARTMENT OF JUSTICE

ER05-695-LC-7876



Photo # 9

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U.S. DEPT. OF JUSTICE

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Photo # 10

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ENDS-885-LC-7878



Photo # 11

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U.S. DEPT. OF JUSTICE

EA05-805-LC-7878



Photo # 12

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MAP 461

U.S. DEPARTMENT OF JUSTICE

ERG-005-LC-7888



Photo # 13

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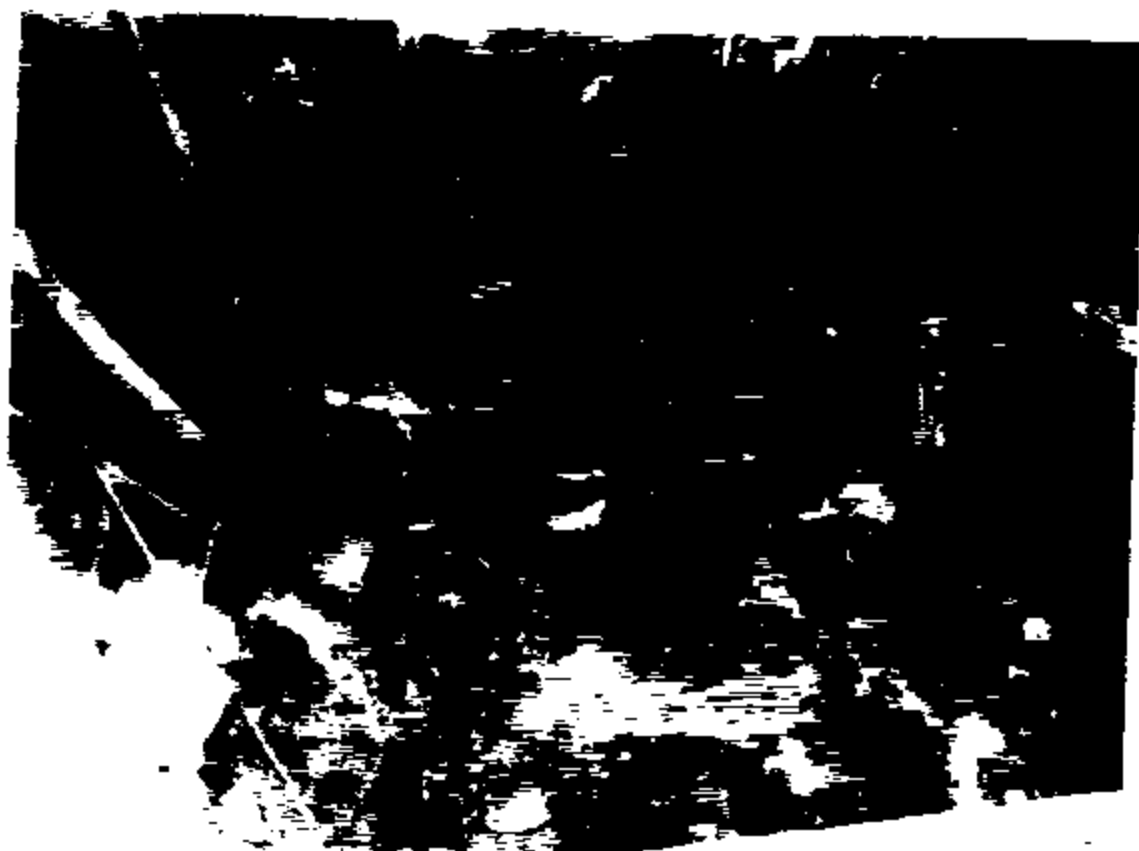


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Photo # 16

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Photo # 17

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MAR 25 1964

OFFICE OF THE DIRECTOR
OF THE ARMY

EROS-625-LC-7625



Photo # 18

RECEIVED

MAR 25 1981

U.S. DEPARTMENT OF JUSTICE
FEDERAL BUREAU OF INVESTIGATION

BA05-005-LC-7888



Photo # 19

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MAF 2 - 2004

EROS-005-LC-7867



Photo # 20

APR 1968

APR 1968

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EA05-005-LC-7888

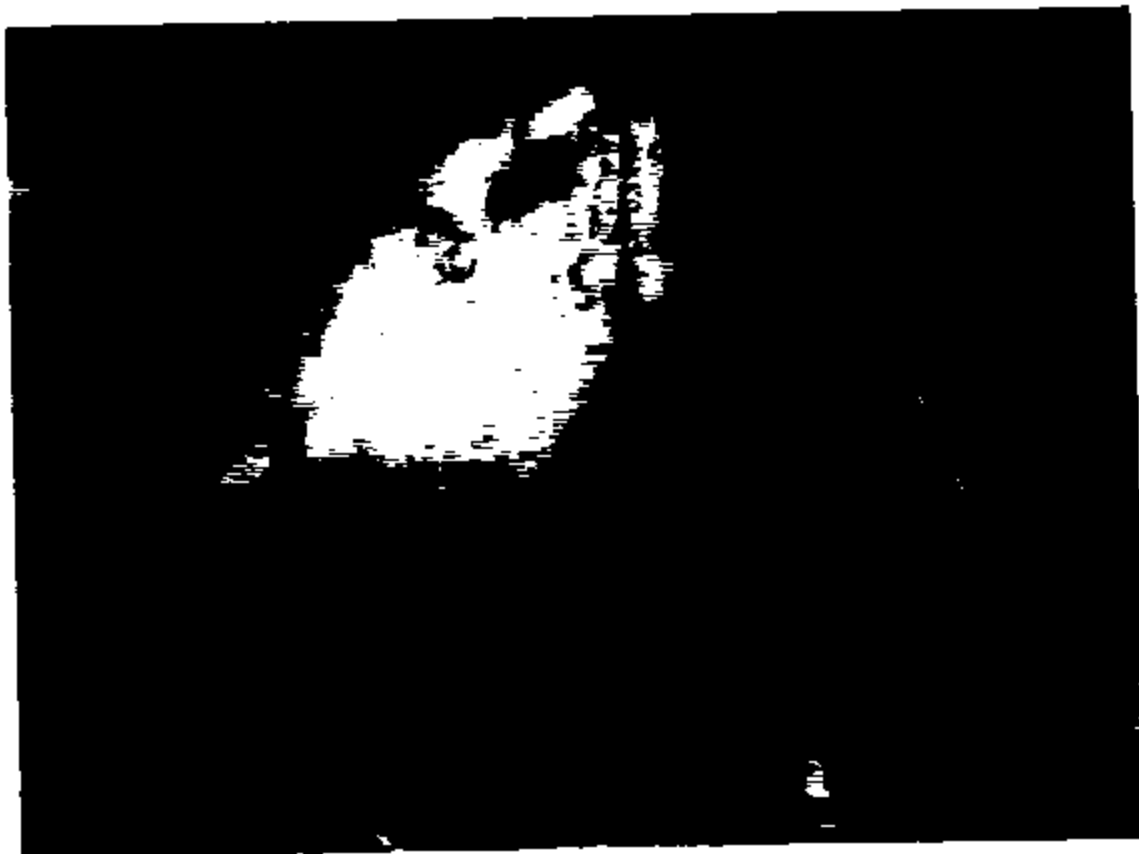


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Photo # 22

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Photo # 23

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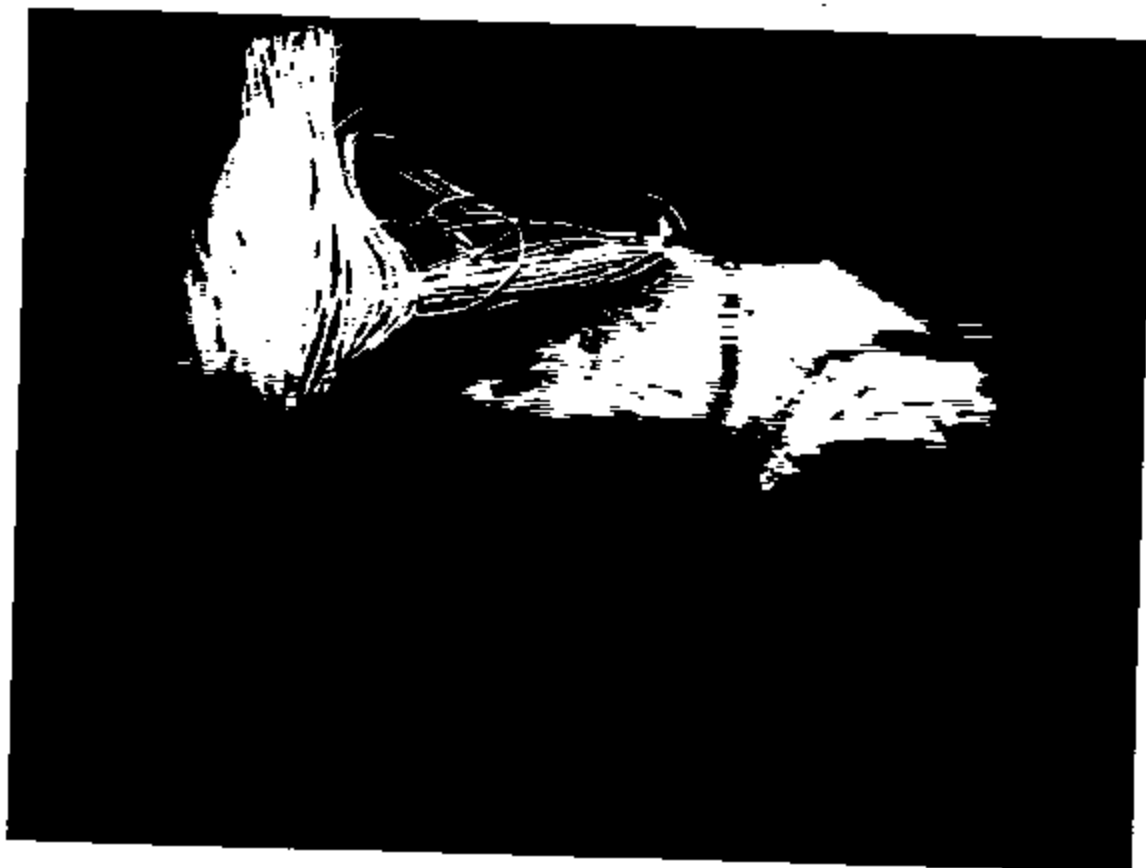


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Photo # 26

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MAP - 2000

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DATE 05-05-2000 BY 7004

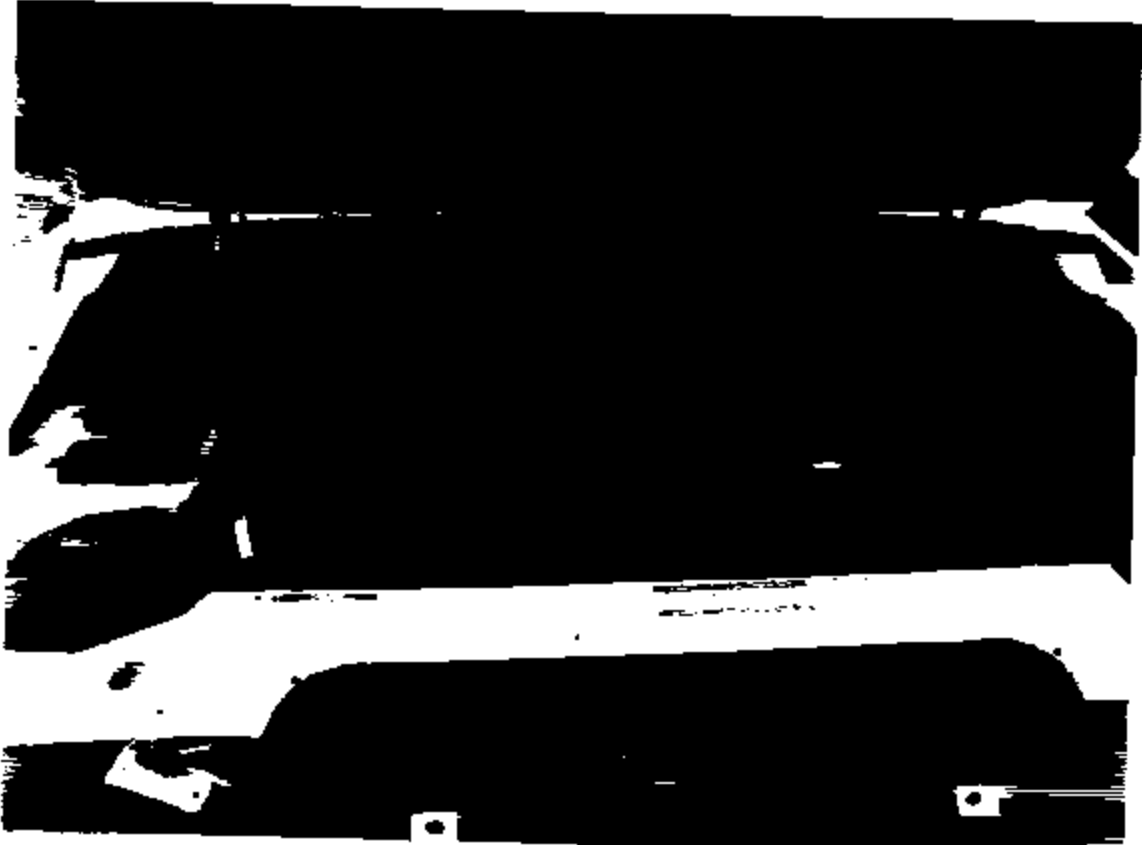


Photo # 27

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Photo #28

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FBI - NEW YORK

ERG5-525-LC-7898



Photo # 29

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MAR 10 1968

U.S. DEPARTMENT OF JUSTICE

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