



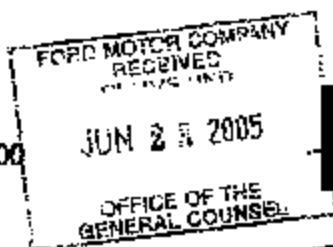


Nationwide® On Your Side™

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

June 15, 2005

Ford Motor Company
Office of General Counsel
Park Lane Tower W, Suite 300
3 Park Lane Blvd.
Dearborn, MI 48126



Attn: Shawn Norton

Re: 7 claims relating to cruise control recall

NEW
- DOL 8/5/03

- '01 Ranger

Dear Ms. Norton:

Enclosed you will find supporting materials regarding 7 additional claims relating to the cruise control recall. We have provided supporting documents for each claim which are separated by a green cover sheet. 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 and 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



EA25-605-LC-5003





EA05-005-LC-0005

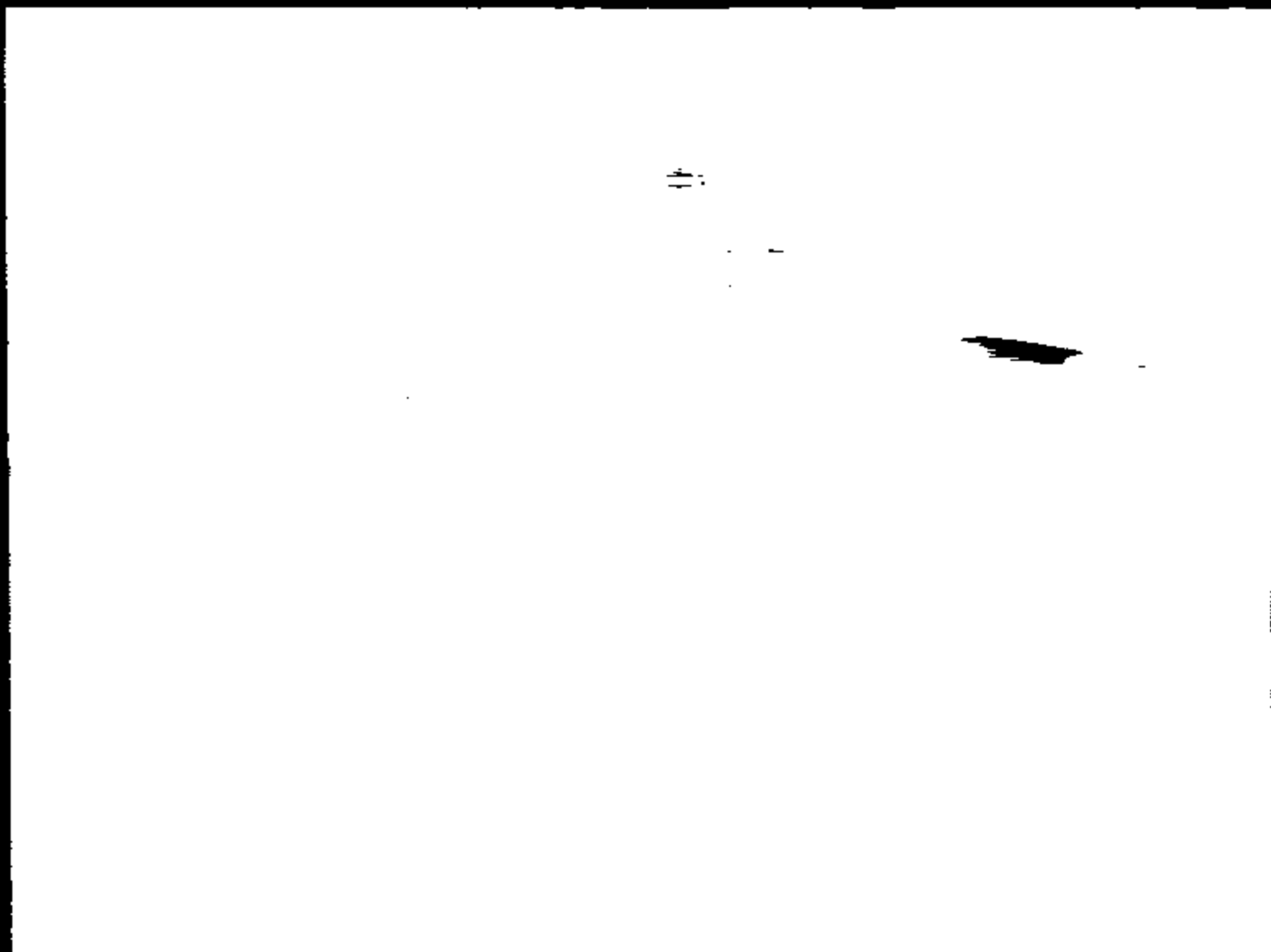


EA05-005-LC-0000



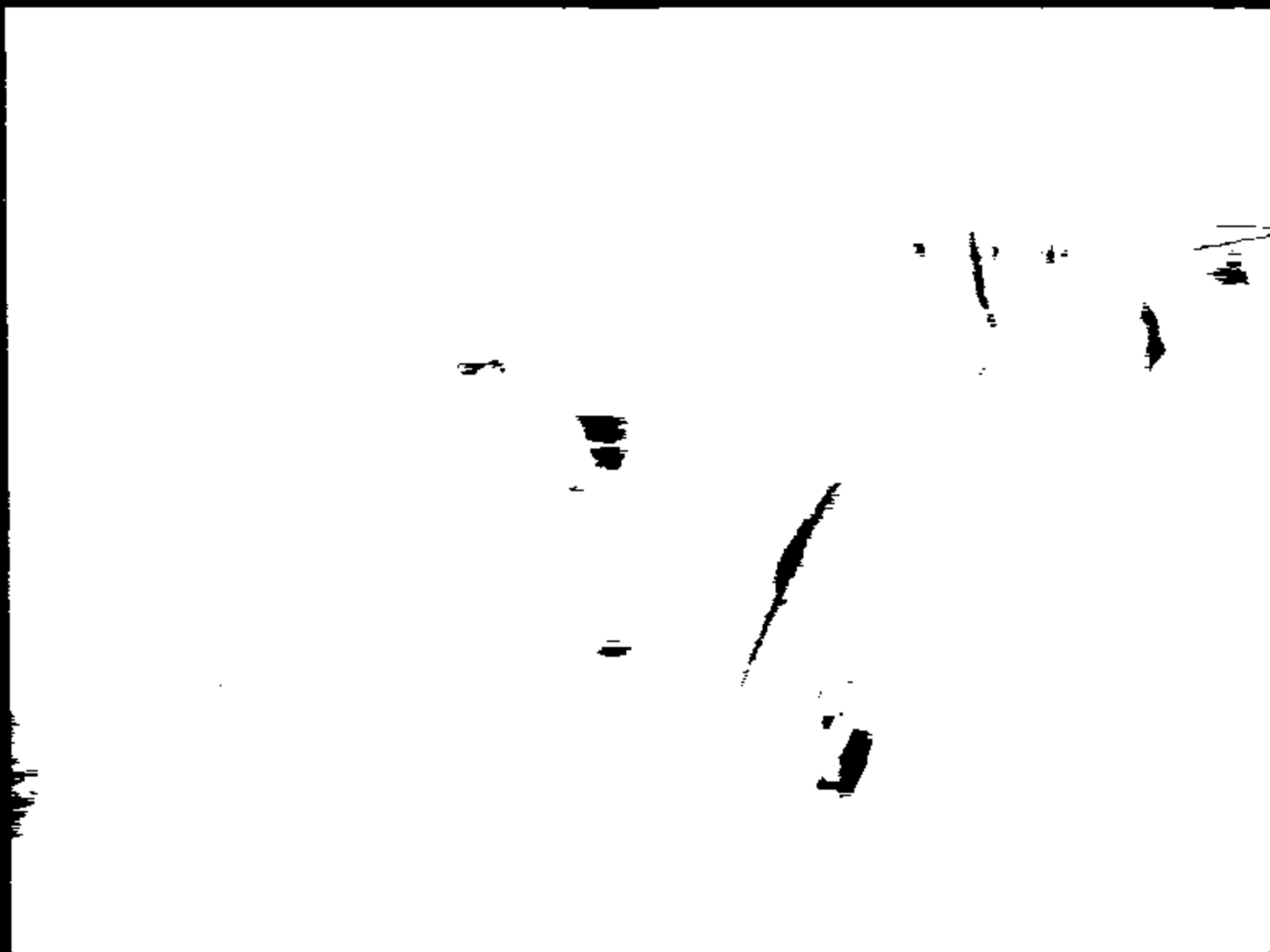
EA05-685-LC-8687







FA05-005-LC-8010



EA05-605-LC-5011



EP25-085-LC-5012





LAW OFFICES

ORTALE, KELLEY, HERBERT & CRAWFORD

THIRD FLOOR NOEL PLACE
200 FOURTH AVENUE NORTH

P. O. BOX 198985

NASHVILLE, TENNESSEE 37219-8985

(615) 256-9999

FACSIMILE (615) 726-1484

www.ortalekelley.com

1971 - 2001
20TH ANNIVERSARY

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OF COUNSEL
ELAINE N. YOUNGBLOOD

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(1931-1985)

FRANKLIN OFFICE
FIRST TENNESSEE BANK BUILDING
221 PUBLIC SQUARE, SUITE 205
FRANKLIN, TENNESSEE 37064
(615) 581-1800
FACSIMILE (615) 581-1844

March 26, 2003

Mr. J. Randolph Bibb, Jr., Esq.
Baker Donelson Bearman & Caldwell, PC
Commerce Center, Suite 1000
211 Commerce Street
Nashville, TN 37201

Re: [REDACTED] v. Ford Motor Company et al.
Hamilton County General Sessions Court No. 03-GS-2205

Gentlemen:

Thank you for contacting me with respect to this matter. As I am not entirely sure with whom I will be dealing from your firm at this time, this correspondence will be sent to each of you.

In response to your inquiry, I am hereby providing some pertinent information in this matter. I have no problems informing you that I am representing State Farm Mutual Automobile Insurance Company's subrogation interest in this matter only. The total subrogation interest amounts to \$14,902.50, which is derived from the total loss of the vehicle and destruction of a few personal property items inside the vehicle.

From what my file indicates, [REDACTED] purchased a 1999 Ford Ranger from Mtn. View Ford, Inc., in Chattanooga, on May 13, 1999. On April 25, 2000, at approximately 5:00 p.m., [REDACTED] truck spontaneously caught on fire underneath the hood while he was driving it on Brock Road in Chattanooga. According to [REDACTED] he was traveling on Brock Road, when a passerby started yelling at him to get his attention. He noticed flames coming from underneath the hood of the truck, applied the emergency brake, and exited the truck. The Standifer Gap Fire Station-Tri-Community was contacted, and by the time their truck arrived, the entire front and cab portions of the vehicle were completely destroyed.

The truck's VIN # is 1FTYR10C4X[REDACTED] and it is being kept with Verastar (formerly Sadisco), 2801 Asbury Pike, Chattanooga, TN, 37404, Pool # 03002422, where it is available for your inspection. If you intend to inspect the truck, please contact me

RECEIVED
MAR 26 2003

ER25-005-LC-0014

March 26, 2003

Page 2 of 2

with several amenable times so that I may ensure that a State Farm representative or myself may attend as well.

As of this point, I do not have in my possession any repair records for the vehicle. It is my understanding that any and all repairs were made by Mtn. View Ford and Marshal Mize Ford in the Chattanooga area; however, if I learn of any other repairs, I would be glad to offer you such information upon receipt.

I am in possession of several color photographs of the truck post-fire, and can send you copies of the same upon request. At this point in time, I am willing to let you know that Jerry Carter, CFI, of TechniFire Services Company, has conducted a thorough investigation of the truck's remnants and has determined that the fire resulted from a failure of the flexible power steering lines. We can discuss the disclosure of his report upon your receipt of this letter.

As noted above, the full subrogation interest in this matter amounts to \$14,902.50. This amount was calculated by taking the basic book price of \$11,700.00, and adding \$ 300.00 for a tool box, \$100 for a bed liner, \$130 for a compact disc player, \$800 for other equipment stored in the vehicle that was destroyed, and \$50 for a bug shield/visor, with a sub-total of \$13,250.00. After adding back taxes and fess of \$842.50, the total fire loss amounts to \$14092.50. My records indicate that Ford Motor Credit Company was issued a draft for \$14,252.50 as payoff.

I note that State Farm originally sent some of this information to Ford's General Counsel Office in Michigan. My file reveals some correspondence from Shawn Norton, a Claims Analyst for Ford.

If I can be of any further assistance, please do not hesitate to contact me. I look forward to working with you in this matter.

Very truly yours,

ORTALE, KELLEY, HERBERT & CRAWFORD



Timothy D. Patterson

TDP/jmc

CC: Mr. John Phillips, Esq.
Mr. Robert W. Sauser, Esq.

TO ANY LAWFUL OFFICER TO EXECUTE AND RETURN.

Summon FORD MOTOR COMPANY, registered agent: C.T. CORPORATION SYSTEMS, 530 Gay Street
Memphis, TN 37502; MIN. VIEW FORD, INC., registered agent: C.T. CORPORATION SYSTEMS, 530 Gay
Street, Memphis, TN 37502; MARSHAL NITZE FORD, INC., registered agent: MARSHAL D. NITZE, 5548 ERM
Highway 153, Memphis, TN 37303
 to appear before the Court of General Sessions of Hamilton County, Tennessee, to be held at the Court Bldg. in said County.

then and there to answer in a civil action brought by Plaintiff [redacted] for property damage and other damages to be proved at trial, arising from a total fire loss to Plaintiff's 1999 Ford Ranger truck, directly and proximately caused by the above named Defendants as a result of breach of contract, breach of express warranties, breach of implied warranties, and/or negligence in the sale, design, manufacture, service, maintenance, repair, diagnosis, and/or instructions to Plaintiff that the vehicle was safe to drive when in fact it was not. Alternatively, Defendant Ford Motor Company, Inc. is strictly liable for a manufacturing and/or design defect which rendered the vehicle in a defective and/or unreasonably dangerous condition. Damages are in an amount under \$15,000.000.

The same being within the jurisdiction of said Court.

PAULA T. THOMPSON, Clerk

Issued this 4 day of March 2003 By [Signature] D. Clerk

Judgment for the PLAINTIFF (DEPENDANT) — against the DEFENDANT (PLAINTIFF)

For \$ _____ dollars and cost of soil,
for which Excursion may issue.

This _____ day of _____, 20_____

DEFAULT ☐ CONFESSED ☒

TRIAL ☐ AGREED ☐

Judge of the Court of General Sessions
Division No. _____

No. ms 2205

LEBBY HOBBS

PlunderIT

Came in hand same day issued and executed as command
he rendered the within warrant to

Served Special Assistant Secretary for Service of Process to C. T. Corporation
1988-1990. Was designated Agent for

vs.
 FORD MOTOR COMPANY, registered agent: C.T. CORPORATION -
 SYSTEM, 530 Gay Street, Knoxville, TN 37902
 WYN VISION BOARD, INC., registered agent: C.T. CORPORATION
 SYSTEM, 530 Gay Street, Knoxville, TN 37902
 MARSHALL MIZE BOARD, INC., registered agent: MARSHALL D.
 MIZE, 3348 Highway 153, Chattanooga, TN 37349

Defendants

ending 24.50

CIVIL WARRANT
COURT OF GENERAL SESSIONS

Sgt Maj April 26. _____ 3003

Read 20 _____ at 9:00 A.M. Fl. Def.

Exam _____ at 9:00 A.M. Pl. Def.

Page 28 at 9:00 A.M. Pl.-Def.

Filed _____ at 9:00 A.M. Fl. Def.

Timothy D. Patterson #22225

PLAINTIFF'S ATT.
ORTALE, KELLEY, HERBERT & CHAMFORD
(615) 256-0000

DEFENDANT'S ATTY.

TO DEFENDANTS)

Cases are not tried on the above date. If you want a trial, i.e., are contesting this suit, you should appear and be set for trial on another date. If you do not appear: leave it set for trial, a default judgment may be entered against you.

47025-025-L C-0016

MILITARY AFFIDAVIT

I do solemnly swear that I am a resident of the State of Tennessee and that to the best of my knowledge and belief, the defendant is not now a member of the United States Armed Forces.

SWORN TO AND SUBSCRIBED BEFORE ME

AFFIANT

This _____ Day of _____, 20____.

Notary Public.

PAULA T. THOMPSON, CLERK

My term expires: _____

BY _____

D. Clerk

NOTICE TO THE DEFENDANT(S):

Tennessee law provides a four thousand dollar (\$4,000.00) personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the clerk of the court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed; these include items of necessary wearing apparel (clothing) for your self and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible, and school books. Should any of these items be seized you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer.

PAUPER'S OATH

I do solemnly swear that I am a resident of the State of Tennessee and that owing to my poverty, I am not able to bear the expense of the action which I am about to begin and that I am justly entitled to relief sought, to the best of my belief.

SWORN TO AND SUBSCRIBED BEFORE ME

AFFIANT

This _____ Day of _____, 20____.

Notary Public.

PAULA T. THOMPSON, CLERK

My term expires: _____

BY _____

D. Clerk

APPEAL

From the judgment on the reverse hereof, the _____ prayed an appeal to the Circuit Court which is granted upon Pauper's Oath or Appeal Bond

this _____ day of _____, 20____.

COST OF APPEAL TOTAL \$ _____

Judge of the Court of General Sessions

Paid by Plaintiff \$ _____

Division No. _____

CERTIFICATION

STATE OF TENNESSEE
COUNTY OF HAMILTON

I, PAULA T. THOMPSON, Clerk of the General Sessions Court in and for the State and County aforesaid, hereby certify that _____ copy of the original CIVIL WARRANT issued in the case of

_____ vs. Ford Motor Company
No. 03-2205 as same appears on file in my office. *Wm. V. Ford*
Shirley Marie Ford

THIS COURT HAS NO SEAL

PAULA T. THOMPSON, Clerk

By _____

D. Clerk

ER05-005-LC-0017





FARMERS

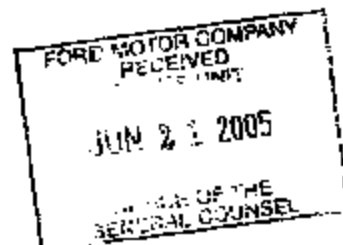
National Document Center
P.O. Box 268992
Oklahoma City, OK 73126-8992
claimsdocument@farmersinsurance.com
Fax : 877-217-1389

06/10/2005

Ford Motor Company
Consumer Affairs
Attn: Shawn Norton
P O Box 6248 MD-3NE-B
Dearborn, MI 48126

Ken

Re: Our Insured: [REDACTED]
Loss Date: 05/08/2005
Claim Number: [REDACTED]
Total Amount Owed: \$7,627.63



Dear Ms. Norton,

A review of the facts of the above loss indicates that your product failed and caused damage to our insured's property. We have made payment to our insured for these damages, and now seek reimbursement from you. **WE RESPECTFULLY ASK THAT YOU NOT RESPOND TO OUR REQUEST WITH A FORM LETTER.**

You will find this correspondence and its enclosures contain substantive information and support adequate for your firm to make a decision concerning your liability. ***The vehicle will be available for your inspection during the next 60 days. Afterwards, we will be required to attempt to sell the salvage.***

The entities in the stream of commerce, such as you, a manufacturer, are liable in both negligence and product liability. As you know, your obligation is to properly design and test, manufacture, and give appropriate instructions for installation and use of your product.

Your product did not meet the expectations of my insured, the consumer. Your product failed and caused the loss resulting in damages of 7,627.63. Attached are documents substantiating payment.

It is our desire to settle this claim without causing you the additional time and cost of litigation or arbitration. After reviewing the enclosed, please call me to discuss resolving this matter.

Sincerely,
Farmers Texas County Mutual Insurance Company



Carmen Ruble
Auto Subrogation Representative
512-238-5746
carmen.ruble@farmersinsurance.com
ENCLOSURES

WB504 F00D	Tx State	5/8/2005 Incident Date	1 Station	2005280 Incident Number	0 Exposure	NFIRS - 1 Basin
Location Street Address 3816 Number/Highpost		<input type="checkbox"/> Address is on the Wildland Fire Module Prefix Williams Street or Highway		Census Tract: 000000 RD Street Type		Suffix
Apt./Suite/Room		Benbrook City		TX State		Zip Code
Cross street or directions						
Incident Type 131 Passenger vehicle fire Aid Given or Received None				Dates & Times Alarm: 6/8/2005 15:46:00 Arrival: 5/8/2005 15:51:00 Controlled: 00:00:00 Last Unit: 5/8/2005 16:25:00		Shifts & Alarms C 1 200 Shifts Alms Dist Special Studies
Their F00D State Their Incident Number						
Actions Taken 11 Extinguish Primary Action Taken (1) Additional Action Taken (2) Additional Action Taken (3)				Resources <input type="checkbox"/> Apparatus or Personnel Form Used Apparatus Personnel Suppression: 2 7 EMS: 0 0 Other: 0 3 <input type="checkbox"/> Resource counts include aid received		
Estimated Dollar Losses & Values LOSSES Property: 5,900 <input type="checkbox"/> None Contents: 0 <input checked="" type="checkbox"/> PRE-INCIDENT VALUE: Property: 0 <input type="checkbox"/> Contents: 0 <input checked="" type="checkbox"/>						
Casualties <input checked="" type="checkbox"/> None Deaths Injuries Fire Service: 0 0 Civilian: 0 0				Hazardous Materials Released N None		
Detector				Mixed Use Property NN Not mixed use		
Property Use 410 1 or 2 family dwelling						

Person/Entity involved		Business name		Phone Number	
Mr., Ms., Mrs.	First Name	MI	Last Name	Suffix	
3918	Williams			RD	
Number	Prefix	Street or Highway		Street Type	Suffix
Post Office Box	Apt./Suite/Room	Benbrook			
TX		City			
State	Zip Code				

Owner		Business name		Phone Number	
Mr., Ms., Mrs.	First Name	MI	Last Name	Suffix	
3918	Williams			RD	
Number	Prefix	Street or Highway		Street Type	Suffix
Post Office Box	Apt./Suite/Room	Benbrook			
TX		City			
State	Zip Code				

Authorization					
Officer in charge:	Garcia, Jim	Signature:			
	Assignment	5/8/2005	Captain/EMT-P Jim Garcia		
		Date			
Member making report:	Garcia, Jim	Signature:			
	Assignment	5/8/2005	Captain/EMT-P Jim Garcia		
		Date			

WB504	Tx	5/8/2005	1	2006280	0	HPRS - 1
FDID	State	Incident Date	Station	Incident Number	Exposure	Notes

Notes	Title: Incident notes
-------	-----------------------

E-2 / L-1 responded to a reported Vehicle Fire in the driveway against the residence. Upon arrival had Ford F-150 PU on fire attempting to be extinguished by passerby with garden hose. Vehicle was parked 2 ft from residential garage door. E-2 crew completed extinguishment with foam extinguisher. Minor smoke residue damage to overhang of residence.

Cause and Origin: Under Investigation
Origin at Brake Master Cylinder Area

Vehicle: 1987 Ford F-150
VIN: 1FTDF172XVN [REDACTED]
LP: 8DN-881

Owner: [REDACTED]
Benbrook, Tx
[REDACTED]

Witness who attempted to extinguish fire: Charles Schotta
115 1st St
Denton, Tx. 76201
(940-383-4987)

P.9/B

TD:8175779918

MAY-16-2005 14:39 FROM: BENBROOK FIRE DEPT 0170494999

2005-085-LC-8822

WB504 FOID	Tx State	5/8/2005 Incident Date	1 Station	2005283 Incident Number	0 Exposure	NFIR5 - 2 Fire
---------------	-------------	---------------------------	--------------	----------------------------	---------------	-------------------

Property Details	
0 Est. number of residential units	<input checked="" type="checkbox"/> Not Residential
0 Number of buildings involved	<input checked="" type="checkbox"/> Buildings not involved
0.000 Acres burned	<input checked="" type="checkbox"/> None <input type="checkbox"/> Less than one acre
On-Site Materials or Products	
<input checked="" type="checkbox"/> None	
On-site material (1)	Storage use (1)
On-site material (2)	Storage use (2)
On-site material (3)	Storage use (3)

Ignition	Class Of Ignition
03 Engine area, running gear, wheel area	<input type="checkbox"/> Exposure Report
Area of origin	5 Cause under investigation
UU Undetermined	Cause
Heat Source	Factors Contributing To Ignition
00 Liquids, piping, filters, other	<input checked="" type="checkbox"/> None
Item first ignited <input type="checkbox"/> Confined to object of origin	NN None
20 Flammable or combustible liquid, other	Factor contributing to ignition (1)
Type of material first ignited	Factor contributing to ignition (2)

Human Factors Contributing To Ignition	<input type="checkbox"/> Age was a factor
<input checked="" type="checkbox"/> None	
<input type="checkbox"/> Asleep	
<input type="checkbox"/> Possibly impaired by alcohol or drugs	Estimated age of person involved
<input type="checkbox"/> Unattended person	
<input type="checkbox"/> Possibly mentally disabled	
<input type="checkbox"/> Physically disabled	Sex of person involved
<input type="checkbox"/> Multiple persons involved	

WB804 PDD	Tx State	5/8/2005 Incident Date	1 Station	2005280 Incident Number	0 Exposure	NFIRS - 2 Fire
--------------	-------------	---------------------------	--------------	----------------------------	---------------	-------------------

Equipment involved in ignition <input checked="" type="checkbox"/> None NNN None Equipment code Brand: Model: Serial #: Year: 0	Equipment Power Equipment Power Source Code Equipment Portability <input type="checkbox"/> Portable <input type="checkbox"/> Stationary
Fire Suppression Factors <input checked="" type="checkbox"/> None Fire suppression factor (1) Fire suppression factor (2) Fire suppression factor (3)	

Mobile Property Involved <input type="checkbox"/> None <input type="checkbox"/> Not involved in ignition, but burned <input type="checkbox"/> Involved in ignition, but did not burn <input checked="" type="checkbox"/> Involved in ignition and burn F-150 Pickup Mobile property model BDNB91 License Plate Number TX State 1997 Year 1FTDF172XV7 VIN Number	Mobile Property Type & Make 10 Passenger road vehicle, other Mobile property type FO Ford Mobile property make
--	--

Local Use <input type="checkbox"/> Pre-Fire Plan Available <input type="checkbox"/> Aeron report attached <input type="checkbox"/> Police report attached <input type="checkbox"/> Coroner report attached <input type="checkbox"/> Other reports attached

P-B-B

10:51:57 6166

66649999

MAY-16-2005 14:40 FROM: BENGROOK FIRE DEPT

E085-085-LC-8824

WB504 FDID	Tx State	5/8/2005 Incident Date	1 Station	2005280 Incident Number	0 Exposure	NFIRE - 9 Apparatus
---------------	-------------	---------------------------	--------------	----------------------------	---------------	------------------------

Unit ID:	Eng 2	Dispatched:	5/8/2005	15:48:00	Use: Suppression
Serial #:		Enroute:		00:00:00	
Type:	11 Engine	Arrival:	5/8/2005	15:51:00	
		Clear:	5/8/2005	16:25:00	
		In Quarters:		00:00:00	
Actions Taken					
1)				3)	
2)				4)	

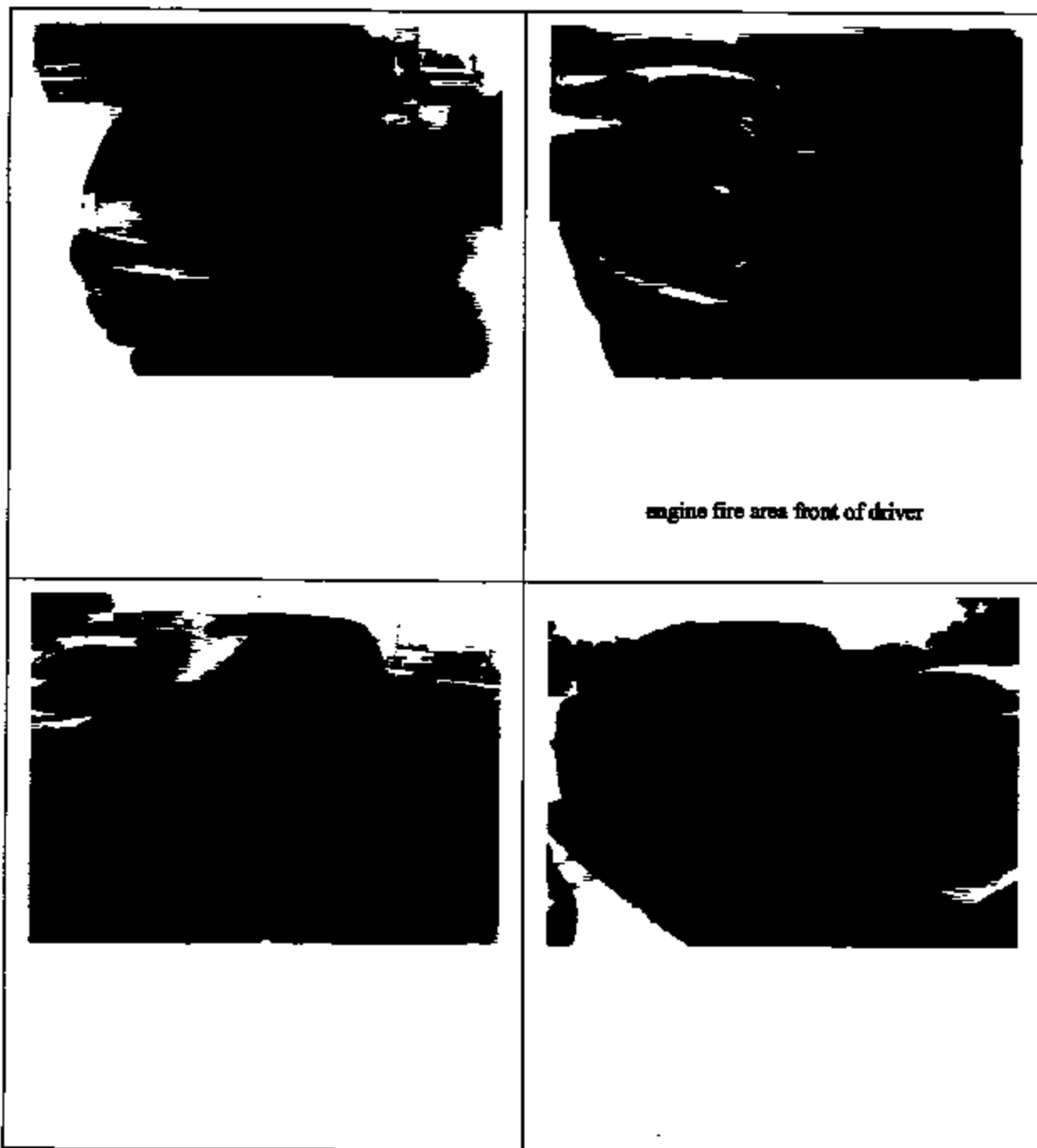
Personnel ID	Name	Rank
Bowman, Jason	Firefighter Jason Bowman	Firefighter
Garcia, Jim	Captain/EMT-P Jim Garcia	Captain/EMT-P
Tate, William	Firefighter/EMT-P William Tate	Firefighter/EMT-P
Whalley, Landon, C	Firefighter Landon Whalley	Firefighter

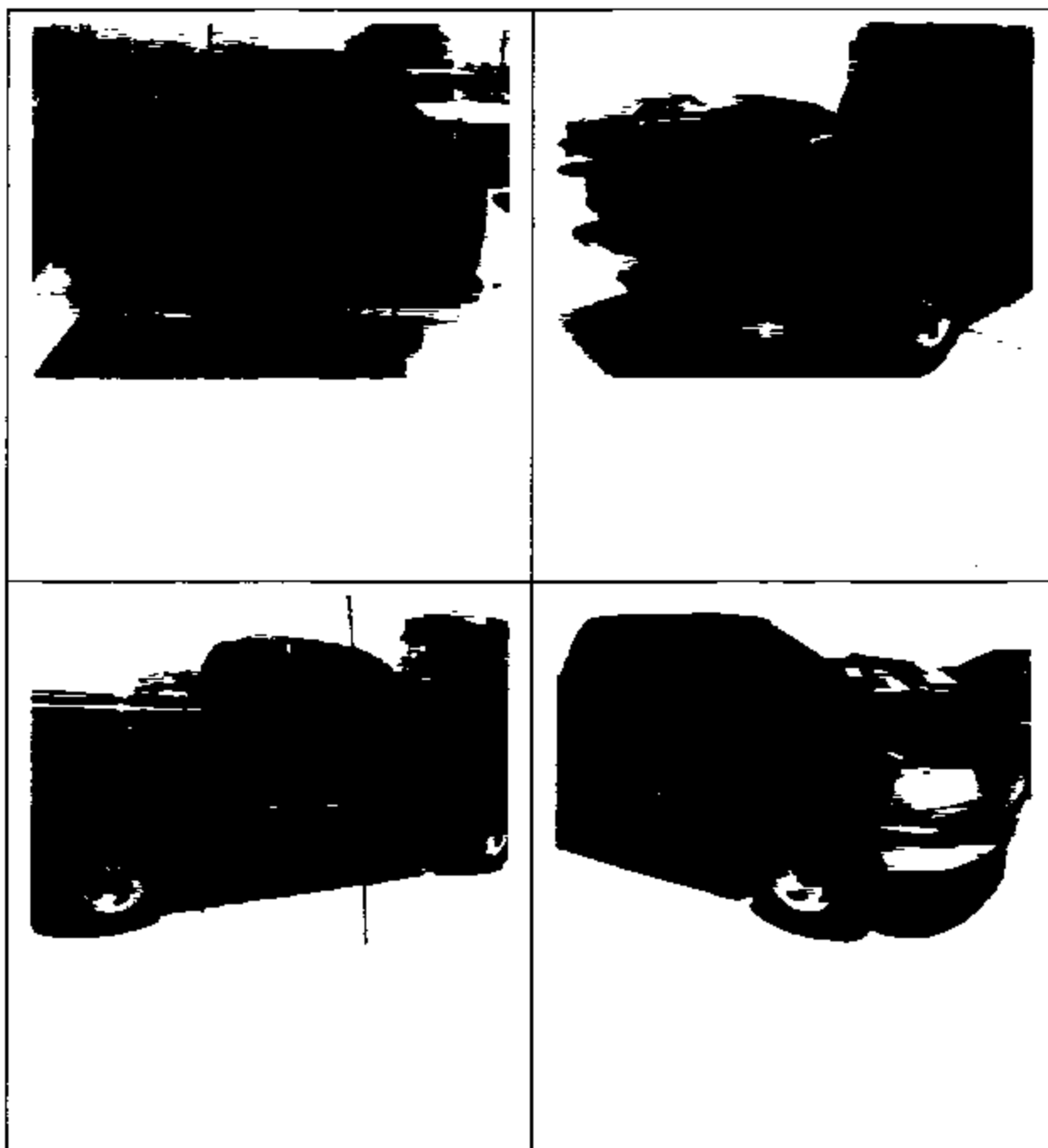
Unit ID:	Led 1	Dispatched:	5/8/2005	15:48:00	Use: Suppression
Serial #:		Enroute:		00:00:00	
Type:	12 Quint	Arrival:	5/8/2005	15:51:00	
		Clear:	5/8/2005	16:25:00	
		In Quarters:		00:00:00	
Actions Taken					
1)				3)	
2)				4)	

Personnel ID	Name	Rank
Cox, Sammy	Firefighter/EMT Sammy Cox	Firefighter/EMT
Howard, Gary	Firefighter/EMT Gary Howard	Firefighter/EMT
Lindgren, Dennis	Lieutenant/EMT-P Dennis Lindgr	Lieutenant/EMT-P

WB504 FDID	Tx State	5/8/2005 Incident Date	1 Station	2005280 Incident Number	0 Exposure	NFRB - 10 Personnel
---------------	-------------	---------------------------	--------------	----------------------------	---------------	------------------------

Personnel ID	Name	Rank	Unit ID:
Bowman, Jason	Firefighter Jason Bowman	Firefighter	Eng 2
Cox, Sammy	Firefighter/EMT Sammy Cox	Firefighter/EMT	Led 1
Garcia, Jim	Captain/EMT-P Jim Garcia	Captain/EMT-P	Eng 2
Howard, Gary	Firefighter/EMT Gary Howard	Firefighter/EMT	Led 1
Lindgren, Dennis	Lieutenant/EMT-P Dennis Lin	Lieutenant/EMT-P	Led 1
Soule, Shawn	Firefighter/EMT-P Shawn Soul	Firefighter/EMT-P	
Tate, William	Firefighter/EMT-P William Tate	Firefighter/EMT-P	Eng 2
Whalley, Landon, C	Firefighter Landon Whalley	Firefighter	Eng 2
Williams, Josh, C	Firefighter/EMT-P Josh William	Firefighter/EMT-P	
Ybarra, Bruno	Firefighter/EMT-P Bruno Ybarra	Firefighter/EMT-P	







non metal hood melted in hottest area



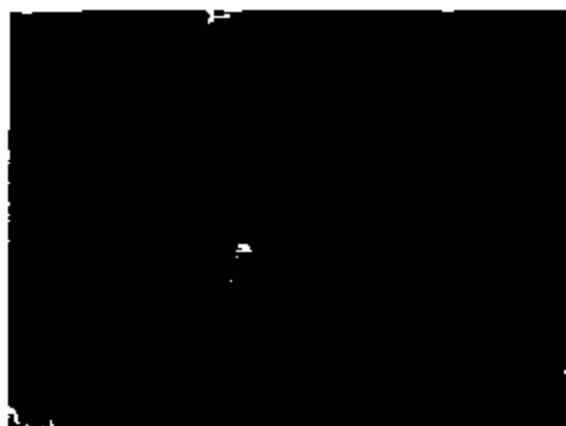


driver foot area





l/f tire melted plastic



looking rearward, steering wheel is just above pix



MAY 12 2005

MAY 12 2005

BEGINNING OF CONTACT
05/12/2005

VOICE OF THE CUSTOMER TRACKING SYSTEM

08.00.04

REGION: 21 ATLANTA	OGC ISSUE	CASE NBR: 1363991315
VIN: 1FTEX17L3V	ZONE: D2	OPENED: 05/11/2005
	ENGINE: L	CLOSED: 05/11/2005
	VEH TYPE: T	

LAST NAME:		FIRST NAME: HALTON	STATUS: CLOSED
TITLE:		MI:	
ADDRESS:		STATE: GA	ZIP:
CITY: DECATUR			
HOME PHONE:		MODEL: F150 4X2 SUPERCAB PICKUP	
MODEL YEAR: 1997			
MILEAGE: 100000			
DEALER NAME: CAREY PAUL FORD	SALES CODE: F21007	P & A: 00277	
REASON CODE: 0792 LEGAL - ACCIDENT / FIRE			
SYMPTOMS: 704100 FIRE/SMOKE VISIBLE FLAME			

ORIGIN: CAC198 - US CONCERN CASE BASE COMMUNICATION: PHONE
 ACTION: 705 - CONTACT ADVANCED TO OGC
 DOCUMENT: ANALYST: CLOPES20 CHERYL LOPES

DATE: 05/11/2005 TIME: 10.12.30:
 ACTION DATA/COMMENTS:

CUSTOMER SAID: - VEH CAUGHT ON FIRE CAUSING STRUCTURAL DAMAGE TO THE FOUNDATION OF THE HOUSE AND GARAGE - CUST IS WONDERING IF HIS VEH IS INVOLVED IN THE RECALL FOR THE CRUISE CONTROL- DATE THE VEHICLE CAUGHT ON FIRE 5TH APRIL, 2005 - WHERE THE FIRE ORIGINATED IN THE VEHICLE. - CUST DOES NOT KNOW WHERE IT ORIGINATED FROM - CURRENT LOCATION OF THE VEHICLE. - INSURANCE COMPANY TOOK IT - WHETHER OR NOT THERE WAS A FIRE REPORT FILED WITH THE FIRE DEPARTMENT. - YES - IF A FIRE REPORT WAS FILED, WHAT THE FINDINGS WERE. - N/A - THE FIRE REPORT NUMBER AND THE CITY OR COUNTY IN WHICH THE REPORT WAS FILED. - 0521470 /DECATUR, GEORGIA - WHETHER OR NOT THE CUSTOMER HAS FILED A CLAIM WITH THEIR INSURANCE COMPANY. - YES - IF A CLAIM HAS BEEN FILED WITH THE INSURANCE COMPANY, WHAT IS THE STATUS OF THE CLAIM. - CUST WAS ADVISED HE NEEDED TO CALL FORD BEFORE INS DOES ANYTHING - WHETHER OR NOT THE VEHICLE IS REPAIRABLE. - NO - WHETHER OR NOT THE VEHICLE WAS RUNNING WHEN THE FIRE STARTED? - NODEALER SAID: CAREY PAUL FORD 4334 SNAPPINGER WOODS DRIVE DECATUR, GA 30035 DISTANCE: 2.38 MILES TEL: (770) 987-9000 FAX: (770) 322-1637 CRC ADVISED: I WILL FORWARD THIS INFORMATION TO THE FORD OGC DEPARTMENT. YOU WILL BE CONTACTED WITHIN 3-5 BUSINESS DAYS.

FORD MOTOR COMPANY
 RECEIVED
 MAY 12 2005

MAY 12 2005

OFFICE OF THE
GENERAL COUNSEL

ISSUE LIST

Last Handling Date/ Issue Status	Name/ Reason Desc	Vin/ Case No.	Model Year and Vehicle Line	Issue Type
5/11/2005 CLOSED	██████████████████ LEGAL - ACCIDENT / FIRE	1FTEX17L3V██████████ 1363991315	1997 F-SERIES	10
5/11/2005 CLOSED	██████████████████ RECALL/ONP - VEHICLE INVOLVEMENT	1FTEX17L3V██████████ 1363991315	1997 F-SERIES	02

EARS-025-LC-0033

5/20/2005

All Action Details for Issue

Print

VIN: 1FTEX17L3VN	Year: 1997	Model: F-SERIES	Case: 1363991315
Name:	Owner Status: Original	WSD: 1887-02-01	
Symptom Desc: FIRE/SMOKE VISIBLE FLAME		Primary Phone:	
Reason Desc: LEGAL - ACCIDENT / FIRE		Secondary Phone:	
Issue Type: 10 OGC	Issue Status: CLOSED		

Action: CONTACT ADVANCED TO OGC

Dealer: 00277 CAREY PAULFORD

Origin Desc: US CONCERN CASE BASE

Odometer: 100000 MI

Comm Type: PHONE

Analyst Name: CHERYL LOPES

Analyst: CLOPES20

Action Date: 05/11/2005

Action Time: 10.12.30.518

Action Data: No

Comments CUSTOMER SAID: - VEH CAUGHT ON FIRE CAUSING STRUCTURAL DAMAGE TO THE FOUNDATION OF THE HOUSE AND GARAGE - CUST IS WONDERING IF HIS VEH IS INVOLVED IN THE RECALL FOR THE CRUISE CONTROL- DATE THE VEHICLE CAUGHT ON FIRE.5TH APRIL, 2005 - WHERE THE FIRE ORIGINATED IN THE VEHICLE. - CUST DOES NOT KNOW WHERE IT ORIGINATED FROM - CURRENT LOCATION OF THE VEHICLE. - INSURANCE COMPANY TOOK IT - WHETHER OR NOT THERE WAS A FIRE REPORT FILED WITH THE FIRE DEPARTMENT.- YES - IF A FIRE REPORT WAS FILED, WHAT THE FINDINGS WERE. - N/A- THE FIRE REPORT NUMBER AND THE CITY OR COUNTY IN WHICH THE REPORT WAS FILED.- 0521470 /DECATUR, GEORGIA - WHETHER OR NOT THE CUSTOMER HAS FILED A CLAIM WITH THEIR INSURANCE COMPANY. - YES - IF A CLAIM HAS BEEN FILED WITH THE INSURANCE COMPANY, WHAT IS THE STATUS OF THE CLAIM.- - CUST WAS ADVISED HE NEEDED TO CALL FORD BEFORE INS DOES ANYTHING - WHETHER OR NOT THE VEHICLE IS REPAIRABLE. - NO - WHETHER OR NOT THE VEHICLE WAS RUNNING WHEN THE FIRE STARTED? - NODEALER SAID: CAREY PAUL FORD 4334 SNAPPINGER WOODS DRIVEDCATUR, GA 30035DISTANCE: 2.39 MILES TEL: (770) 987-8000FAX: (770) 322-1837CRC ADVISED: I WILL FORWARD THIS INFORMATION TO THE FORD OGC DEPARTMENT. YOU WILL BE CONTACTED WITHIN 3-5 BUSINESS DAYS.

E1905-0025-LC-0034

5/20/2005

All Action Details for Issue

Print

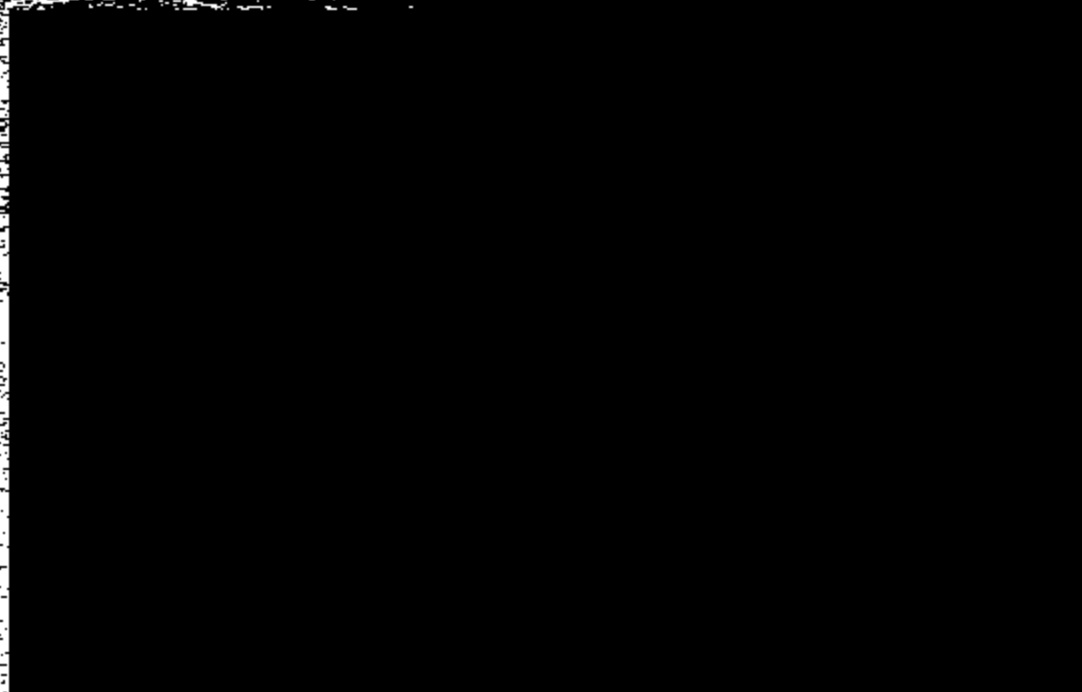
VIN: 1FTEX17L3VN [REDACTED]	Year: 1997	Model: F-SERIES	Case: 1353991315
Name: [REDACTED]	Owner Status: Original	WSD: 1997-02-01	
Symptom Desc: FIRE/SMOKE VISIBLE FLAME		Primary Phone: [REDACTED]	
Reason Desc: RECALL/ONP - VEHICLE INVOLVEMENT		Secondary Phone:	
Issue Type: 02 INFORMATION	Issue Status: CLOSED		

Action: ADVISE CUST NO FSA'S AT THIS TIME		
Dealer: 00277 CAREY PAULFORD	Origin Desc: US INQUIRY CASE BASE	
Odometer: 100000 MI	Comm Type: PHONE	
Analyst Name: CHERYL LOPES	Analyst: CLOPES20	
Action Date: 05/11/2005	Action Time: 10.06.38.514	Action Data: No

Comments CUSTOMER SAID: - CUST WOULD LIKE TO KNOW IF HIS VEH IS INVOLVED IN A RECALL FOR THE CRUISE CONTROL AS VEH CAUGHT ON FIRE DEALER SAID: CAREY PAUL FORD 4334 SNAPPINGER WOODS DRIVEDCATUR, GA 30035 DISTANCE: 2.39 MILES TEL: (770) 987-9000 FAX: (770) 322-1637 CRC ADVISED: VEHICLE IS NOT INVOLVED IN ANY RECALL/CSP AT THIS TIME.

E905-005-LC-0035

5/20/2005





- Government Employees Insurance Company
- GEICO General Insurance Company
- GEICO Indemnity Insurance Company
- GEICO Casualty Insurance Company

One GEICO Blvd. • Fredericksburg, VA 22406-9900

5 JAN -7 AM 8:21

CONSUMER AFFAIRS
SECTION

JUN 13 2005

PAYMENT RECOVERY NOTICE

FORD MOTOR CO., / ATTN: CONSUMER AFFAIRS
PO BOX 6248, MD-3NE-B
DEARBORN, MI 48126

Date: 06/02/2005

Our File #: 026078408-0101-011

Our Insured: [REDACTED]

Your Insured/Driver: [REDACTED]

Your File #: VIN # - 1FTRX18LE1N [REDACTED]

Your Vehicle: 2001 FORD F-150 SUPER CAB Tag #:

Date of Loss/Location of Loss: 02/09/05

**WHEN RESPONDING-
PLEASE REFER TO OUR
CLAIM NUMBER.**

FORD MOTOR CO. / ATTN: CONSUMER AFFAIRS
RECEIVED
JUN 13 2005

JUN 13 2005

OFFICE OF THE
GENERAL COUNSEL

Our investigation shows your insured to be at fault for this accident.

☒ 1. Repair or replacement of our vehicle has been concluded. Our subrogation claim will be forwarded. Please support our interest. **PAYMENT REQUEST WILL BE SENT ONCE THE TOTAL LOSS SETTLEMENT HAS POSTED.**

☐ 2. Payment for repairs has been made. Documentation is attached. Please honor our claim.
CO's Interest: \$ Insured's Deductible: \$ Towing: \$

Rental: \$ **TOTAL AMOUNT PAID TO GEICO: \$**

*******Please pay our insured directly for out of pocket rental of \$**

COMBINED TOTAL OF GEICO AMOUNT & INSURED OUT OF POCKET \$

☐ 3. Our Vehicle was declared a total loss. Documentation is attached. Please honor our claim.

Amount paid to Insured: \$ Insured's Deductible: \$

Net Salvage Recovery: \$ Rental: \$

Towing/Storage: \$ Total: \$

☐ 4. We have subrogation rights for no fault benefits paid. Our documentation is attached. Please honor our claim.
Medical: \$ Wages: \$ Others: \$ Total: \$

☐ 5. Since notifying you on [REDACTED] of our subrogation claim, we have paid additional damages of [REDACTED]. Please include this in your payment to us. Documentation is attached. Our Total Claim is \$ [REDACTED].

****Please pay our insured directly for out of pocket rental of \$**

COMBINED TOTAL \$

☐ 6. Documentation of our claim was sent to you on [REDACTED]. When may we expect payment?

☐ 7. Arbitration was filed and a decision was rendered in our favor on [REDACTED]. Total award is \$ [REDACTED]. When may we expect payment?

☒ 8. Please make your check payable to:

☐ GEICO

☐ GEICO General Insurance Company

☒ GEICO Casualty

☐ GEICO Indemnity Company

MAIL PAYMENT TO:

☒ ATTN: CASHIERS

P.O. BOX 96008

WASHINGTON, DC 20090-6008

THANKS FOR YOUR PROMPT ATTENTION.

PAYMENT RECOVERY EXAMINER: RETHA REEDER

PHONE: (540) 286-7872

FAX: (305) 503-7513

HOURS 8AM - 4:30PM M-F

0005-005-LC-0035



---Original Message---

From: Guakier, Frank (F.D.)
Sent: Wednesday, August 25, 2004 9:28 AM
To: Donnellan, Bob (Robert J.)
Cc: Sorochinsky, Christine (C.); Boudreau-McCarthy, Donna (D.)
Subject: Peter Ivey v. Torn Craft d.b.a Craft's Moving & Storage; Third Party Claim against Ford of Canada and Discount Car and Truck Rentals

Bob,

The foregoing product liability action relates to property damages allegedly sustained as a result of a fire that occurred on or about April 30, 2001 in a 1999 E-450 cut-away with an aftermarket cube, bearing VIN 1FDXE47F1X1[REDACTED]

The third party plaintiff alleges that the fire was the result of a defect in the design or manufacture of the subject vehicle. In particular, it is alleged that the outer wheel bearing in the hub of the front driver's side wheel failed, causing the rim to tilt and the brake caliper to rub on the inside surface of the wheel rim, thereby generating frictional heat which ignited combustible materials in the area, including the tire, brake hose and the brake fluid.

Christine Sorochinsky, FOC's product liability manager, attended oral examinations for discovery as FOC's representative. A number of undertakings were provided at Ms. Sorochinsky's discovery. Please assign this matter to the appropriate OGC Discovery Group attorney as we require FMC's assistance in responding to undertaking #5 and #6 set out below. Please note that I have also attached a copy of 'Exhibit 9' (i.e. SSM # 13763) which is referred to in undertaking #6.

5. Provide all specifications for the wheel assembly dealing particularly with the inner wheel bearing seal that is defective, i.e design drawing.

6. Check to find out the author of memo marked as Exhibit 9, the rationale for its creation, any documents the author received which caused the author to create this document

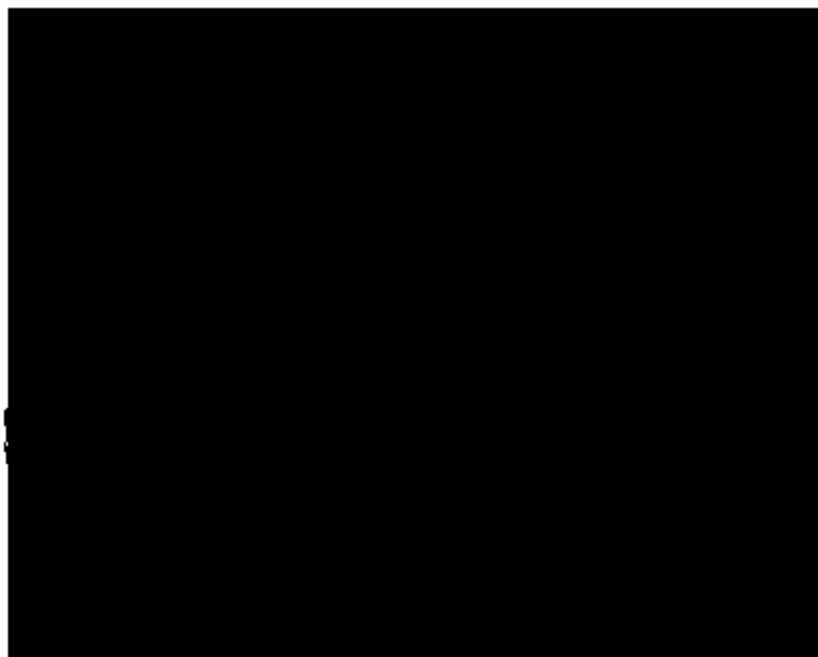
Thank you for your assistance in this matter.



memo.jpg (131 KB)

Frank Guattieri
Legal Counsel
Ford Motor Company of Canada, Limited
Tel: (905) 845-2511 Ext 1428
Fax: (905) 845-5759
E-Mail: fguattie@ford.com

The information contained in this email communication is confidential and legally privileged. If you have received this communication in error, please notify me at the telephone number noted above or by return email and delete this communication and any copy immediately. Thank you.





AMERICAN FAMILY INSURANCE GROUP

7330 SHADELAND STATION • INDIANAPOLIS IN • PHONE: (317) 842-0096

Mailing Address: PO BOX 7093 • INDIANAPOLIS IN 46207-7093

JAN 17 4 01 PM

01/03/2001

Town and Country Ford
Att: General Manager
7800 E Lloyd Expressway
Evansville IN 47715



myrtel
Jarvis

Ford Motor Company
Customer Assistance Center
The American Road
Dearborn MI 48121-1899

Dear Sir/Madam:

Enclosed, please find a copy of our letter to Ford Motor Company regarding our pursuit of reimbursement for damages paid for our insured, as outlined in said letter. If representatives of your respective firms would care to inspect the truck in question, you are invited to contact the American Family Insurance Investigator in charge of this matter, [REDACTED], whose address is [REDACTED] Bloomington IN [REDACTED], phone [REDACTED]. It is our understanding that [REDACTED] intends to offer the teardown inspection on Wednesday, Jan. 23rd, 2002.

Respectfully,

Gary Holdaway
Casualty Claim Examiner
American Family Mutual Insurance Company
P O Box 1286
Newburgh IN 47629-1286
800-374-1111 Ext 42125

cc: [REDACTED]



AMERICAN FAMILY INSURANCE GROUP

7530 SHADELAND STATION • INDIANAPOLIS IN • PHONE: (317) 843-0046

Mailing Address: PO BOX 7093 • INDIANAPOLIS IN 46207-7093

12/07/2001

Ford Motor Company
Customer Assistance Center
The American Road
Dearborn MI 48121-1899

Cap 7

Re: Claim [REDACTED]
Policy [REDACTED]
Insured: [REDACTED]
Date of Loss: 09/24/2001
Vehicle: 2001 Ford Ranger
VIN: 1FTYR10C61T [REDACTED]

To Ford Motor Company Complaints:

As the Auto Insurance Carrier for [REDACTED] Evansville, IN [REDACTED] we have paid on a total loss claim an amount of \$11,391.75 and \$180.00 in rental fees for her which were as a result of her 2001 Ford Ranger pickup truck catching fire and burning beyond repair.

The fire started for unknown reason(s) as [REDACTED] was driving the vehicle in Evansville, IN on 09/24/2001. According to her, smoke began coming from under the hood of the vehicle, and she pulled over to the side of the road and exited the vehicle. At that time a passing motorist stopped and called 911 for her. By the time the Fire Department arrived, the vehicle was burned beyond repair.

[REDACTED] states that she bought the vehicle NEW at Town and Country Ford in Evansville IN on April 20th 2001. She had had work done on the vehicle at various times since buying it. All work was performed by Town and Country Ford. When the fire occurred, Town and Country Ford advised her to turn the claim in to her insurance carrier, as they would not replace the vehicle. [REDACTED] thinks the vehicle had approximately 7100 miles on it at the time of the fire.

The fire obviously was not the fault of [REDACTED] and had to be caused through some malfunction to the vehicle, or by repair work performed by Town and Country Ford.

We are seeking recovery of the above-stated amounts paid on our insured's behalf, and hope to hear from you in the very near future.

EA85-005-LC-0048

Sincerely,

A handwritten signature in cursive script that reads "Gary Holdaway". The signature is written in dark ink and is positioned to the right of the word "Sincerely,".

Gary Holdaway
Casualty Claim Examiner
American Family Mutual Insurance Company
P O Box 1286
Newburgh IN 47629-1286
1-800-374-1111 Ext 42125

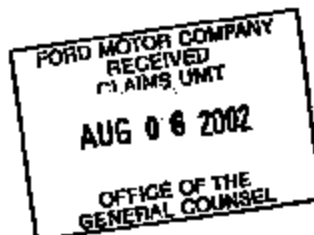


State Farm Insurance Companies



July 23, 2002

FORD MOTOR CREDIT
PARKLANE TOWERS WEST
SUITE 400 3 PARKLANE BLVD
DEARBORN, MI 48126-2568



State Farm Insurance
1134 Kennetec Drive
PO Box 8001
Chambersburg, PA 17201

RE: Claim Number: [REDACTED]
Date of Loss: July 18, 2002
Our Insured: [REDACTED]

MADE/MODEL: 2000 FORD
VIN: 1FTYR10C7YT [REDACTED]

Dear Sir/Madam:

The identified vehicle, 2000 Ford Ranger, is insured by State Farm Mutual Automobile Insurance Company. This vehicle experienced a fire loss.

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

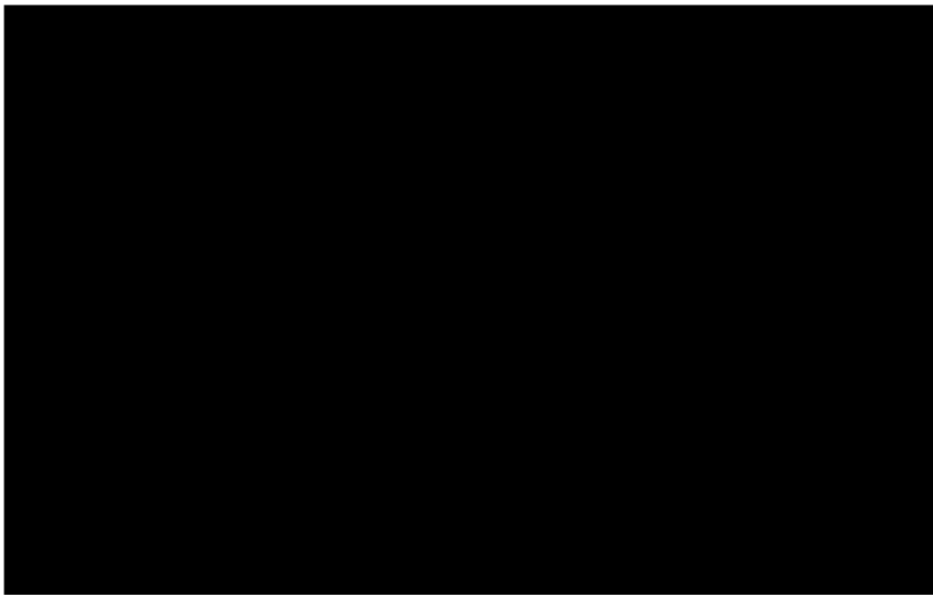
Please contact me at the number listed below to set up a time for your inspection.

Sincerely,


Melissa Cover
Claim Specialist
(717) 261-4858

State Farm Mutual Automobile Insurance Company

2
5



NFIRS		FDID 06701	State GA	Incident Date 08/10/2003	Station 10	Incident Num 03026165	Exposure Num 0
1 - Basic							
Location Type 1		Wildland Loc?		Consume Tract			
Incident Address [REDACTED]					City LAWRENCEVILLE	State GA	ZIP Code [REDACTED]
Wildland Loc?		Cross St or Dr					
Incident Type 131	FDID Rec Aid	State Rec Aid	Alarm D/Tm 08/10/2003 21:04:38		Arrival D/Tm 08/10/2003 21:11:13		# Alarms
Mutual Aid IF	Inc No Rec Aid		Controlled D/Tm		Cleared D/Tm 08/10/2003 21:33:02		Special Study ID
Resource Form? NO				Res Out Inc Aid?		First In Unit ENGINE 10	Property Loss
Actions Taken Investigate				Suppression App 1		Suppression Pers 3	Contents Loss
Actions Taken				EMS Apparatus		EMS Personnel	Property Value
Actions Taken				Other Apparatus		Other Personnel	Contents Value
Fire Serv Desired		Fire Serv Inj		Def. Alarmed Occ		Mixed Use	
Civilian Deaths		Civilian Inj		Hazardous Released		Property Use Single Family Dwelling	
# Involved Pers	Alarm Problem?	# Patients	# Treated		Suspense		
2 - Fire							
# Reg Units 1	Not Residential?	On-Site Material					Storage Use
# Building Inv	Not Bld Involved?	On-Site Material					Storage Use
# Acres Burned	Less Than One?	On-Site Material					Storage Use
Area of Origin Engine area, r		Form of Material Undetermined		Confirmed Fire		Ignition Cause Cause undetermined after investiga	
Heat Source Undetermined		Type of Material		Ignition Factors		Ignition Factors	
Human Factor(s)							Age [REDACTED]
							Sex [REDACTED]
Equip Involved	Make			Year	Power Source		Suppress Factors
Model				Portability		Suppress Factors	
Serial No						Suppress Factors	

NFIRS	FD# D6701	State GA	Incident Date 08/10/2003	Unit 10	Incident Num 03026165	Exposure Num 0
Mobile Prop Inv Involved in ignition and burn		Mobile Property Passenger road vehicle, other				
Make Ford		Model BRONCO			Year 1996	
License Plate No 23CP9		License State	VIN 1FMEU15H6TL [REDACTED]			
3 - Structure Fire						
No data on file.						
4 - Civilian Fire Casualty						
No data on file.						
5 - Fire Service Casualty						
No data on file.						
6 - EMS						
No data on file.						
7 - HazMat						
No data on file.						
8 - Wildland Fire						
No data on file.						
9 - Apparatus or Resources						
No data on file.						
11 - Arson						
No data on file.						
Narrative						
Rep Unit E10						

Engine 10 investigated a fire in a S.U.V. type vehicle at a residence that had already been extinguished by the homeowner. No smoke or flames were present by the time Engine 10 arrived.

Printed By F725/ANDERSEN, JENNY	Printed At 08/15/2003 15:23:26	Page 2 of 2
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Consulting Service

Transportation Technology

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

CASE 23162

TABLE OF CONTENTS

1.0 ASSIGNMENT

1.1 Client

1.2 Subject

1.3 Location

1.4 Purpose

1.5 Date of Inspection

2.0 PARTICIPATING PERSONNEL

3.0 EXAMINATION OF VEHICLE

4.0 CONCLUSIONS

5.0 PHOTOGRAPHS

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1.0 ASSIGNMENT

1.1 Client: Alistate Insurance Company

[REDACTED]

1.2 Subject: 1996 Ford Bronco

Ser# 1FMEV15H8TL [REDACTED]

Mileage # could not determine (elec. odometer)

1.3 Location: Lance Body Shop

Maltes Road

Lawrenceville, GA

1.4 Purpose: Determine cause of fire.

1.5 Date of Inspection: September 16, 2003

2.0 Participating Personnel

2.1 Investigator: Michael E. Bresnock- Consultant

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3.0 EXAMINATION OF VEHICLE

3.1 Subject vehicle was involved in a fire loss on August 10, 2003. It was our understanding that the vehicle was parked when the fire was discovered. The exterior surfaces were photographed to document the condition of the vehicle at the time of the fire investigation (Photos #1, #2, #3, #4). There was no fire damage in the interior (Photo #5). The vehicle identification number was recorded from a label on the driver's side front door (Photo #6).

3.2 The hood panel had been removed by the body shop in preparation for the repairs (Photo #7). The fire damage was located behind the air cleaner ducts and centered around the brake master cylinder (Photo #8). Although some of the flexible rubber hoses in the fire damaged area exhibited some minor exposure damage, they were mostly intact (Photo #9). The major fire damage was at the master cylinder and the wire harness adjacent to and attached to the brake master cylinder (Photo #10). Ford Motor Company elected to install a brake pressure switch in the forward

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Fax (770) 426-6173

section of the brake master cylinder (Photo #11). This switch has a function similar to the cruise control deactivation switch which acts as a redundant switch that opens (turns off) the cruise control in the event of a brake switch failure. Ford Motor company has had documented brake pressure sensing switch failures in similar circuitry on Lincoln, Ford and Mercury products. Melted copper contacts inside the switch were visible while performing a inspection. The switch was removed from the brake master cylinder and photographed to document the melted contacts (Photo #12). The switch was placed inside an evidence bag and labeled with all the pertinent information (Photo #13). After completing a transfer of evidence form, Transportation Technology took custody of the defective switch (Photocopy #1).

4.0 CONCLUSIONS

4.1 The fire originated in the upper left rear of the engine compartment and was caused by a defective brake pressure switch. Electrical current passes through this switch even when the vehicle is parked and unattended. The circuit is intended to

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be interrupted when the brake pedal is depressed. The type of failure noted on the switch can be best described as a high resistance failure. This switch failure is similar to other deactivation type switch failures which have resulted in fire.

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

Investigation Data Sheet

DATE:	MONTH: 9 DAY: 16 YEAR: 03
VEHICLE OWNER	[REDACTED]
VEHICLE MAKE	96 FORD BRUNCO
VEHICLE MANUFACTURER	1FMEU15H6T [REDACTED]
VEHICLE SERVICE #	Ford Motor Car Company
FILE REFERENCE NUMBER	409-710-1150 Allstate 23162-our File
CUSTODY OF THE FOLLOWING ITEMS HAS BEEN TRANSFERRED TO TRANSPORTATION TECHNOLOGY:	
ITEM LIST: BP Switch from master cylinder	
DESCRIPTION: Cruise Control De-Activation Switch Removed from master Brake cylinder and retained as evidence	
TRANSFERRED BY: Lance Body Shop	TITLE: Bobby N. [Signature]
TRANSFERRED TO: Transportation Technology	TITLE: Michael E. Brunner
Note: Label or tag items	

NOTES:

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Marietta, Ga. 30064

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or Toll Free (877) 328-3385

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Photograph: #1

Transportation Technology No. 23162

Dates Taken: September 16, 2003

Description of Subject: 1996 Ford Bronco

Comments: Note: Front view. Also: hood missing.

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Photograph: #2

Transportation Technology No. 23162

Dates Taken: September 16, 2003

Description of Subject: 1996 Ford Bronco

Comments: Note: View of passenger's side.

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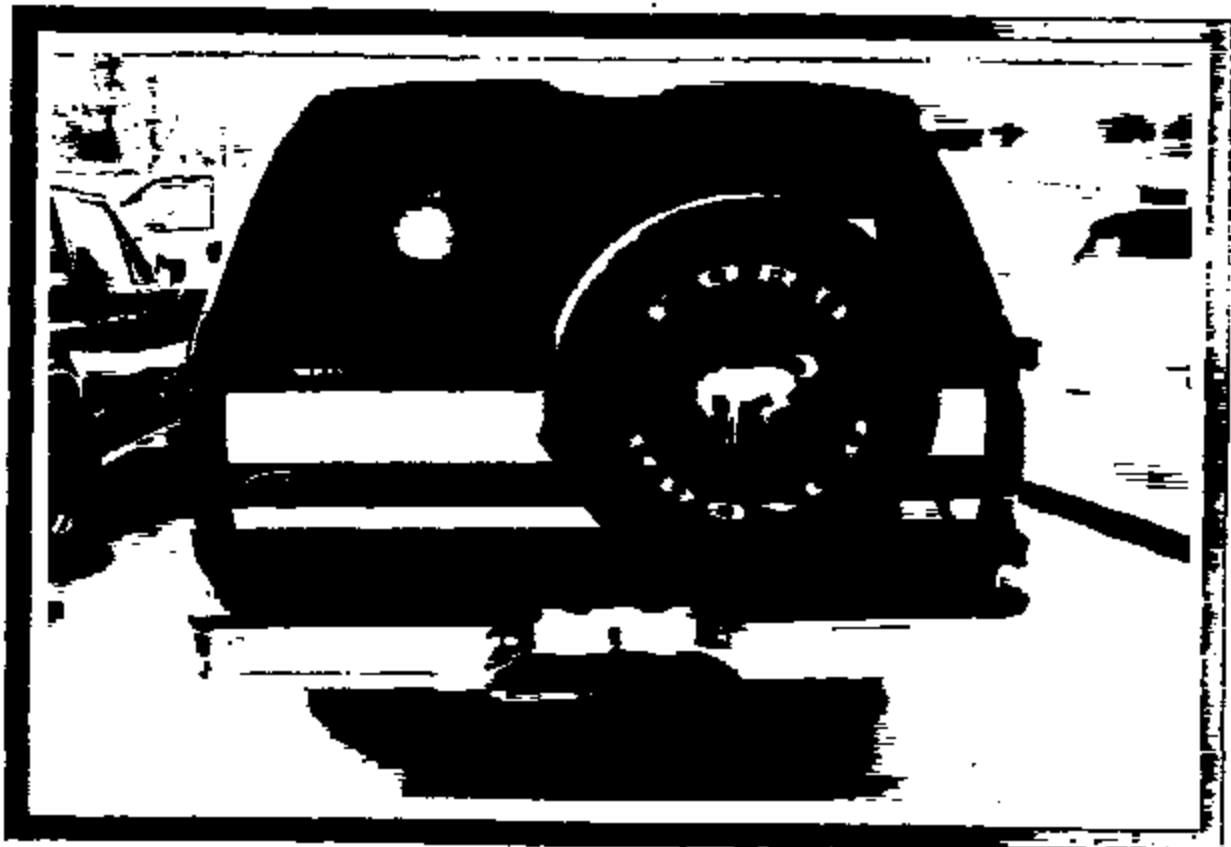
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or Toll Free (877) 328-3385

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Photograph: #3

Transportation Technology No. 23102

Dates Taken: September 16, 2003

Description of Subject: 1998 Ford Bronco

Comments: Note: Rear view.

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Photograph: #4

Transportation Technology No. 23162

Dates Taken: September 16, 2003

Description of Subject: 1996 Ford Bronco

Comments: Note: View of driver's side.

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Photograph: #5

Transportation Technology No. 23182

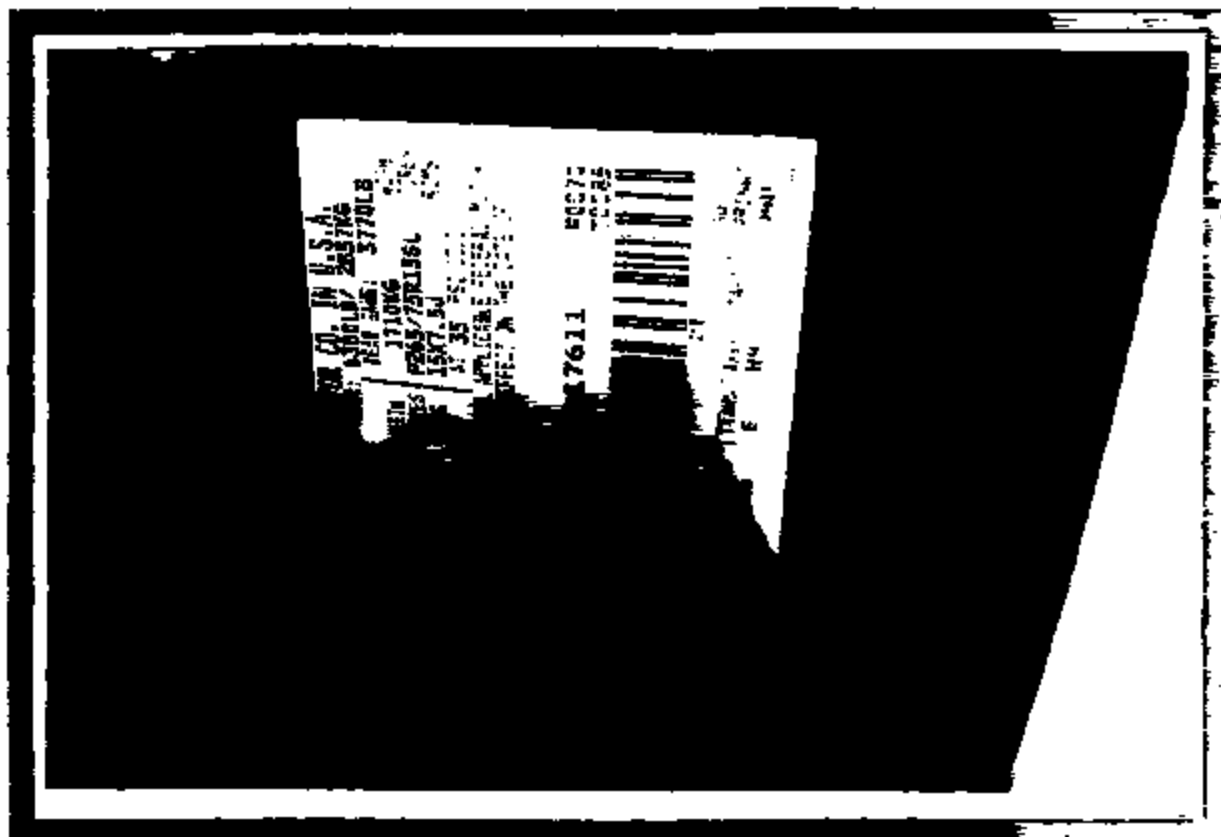
Dates Taken: September 16, 2003

Description of Subject: Interior (front)

Comments: Note: No fire damage in the interior.

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Marietta, Ga. 30064
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or Toll Free (877) 328-3385
www.vehicleinvestigator.com

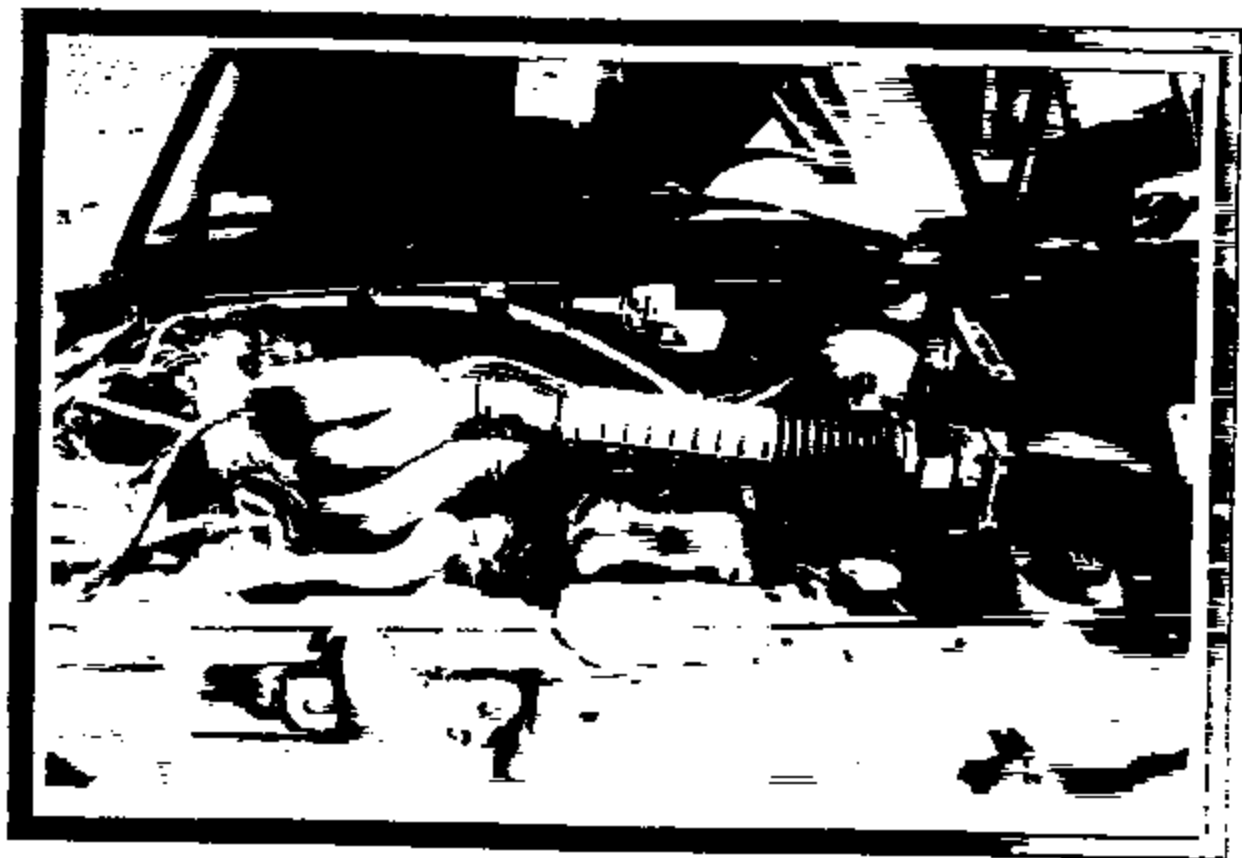


PAES-025-LC-0056

Consulting Service

Transportation Technology

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Marietta, Ga. 30064
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or Toll Free (877) 328-3386
www.vehicleinvestigator.com



Photograph: #7 Transportation Technology No. 23162
Date Taken: September 16, 2003
Description of Subject: Vehicle (front)

Comments: Note: Hood panel removed by body shop in preparation for repairs.

Consulting Service

Transportation Technology

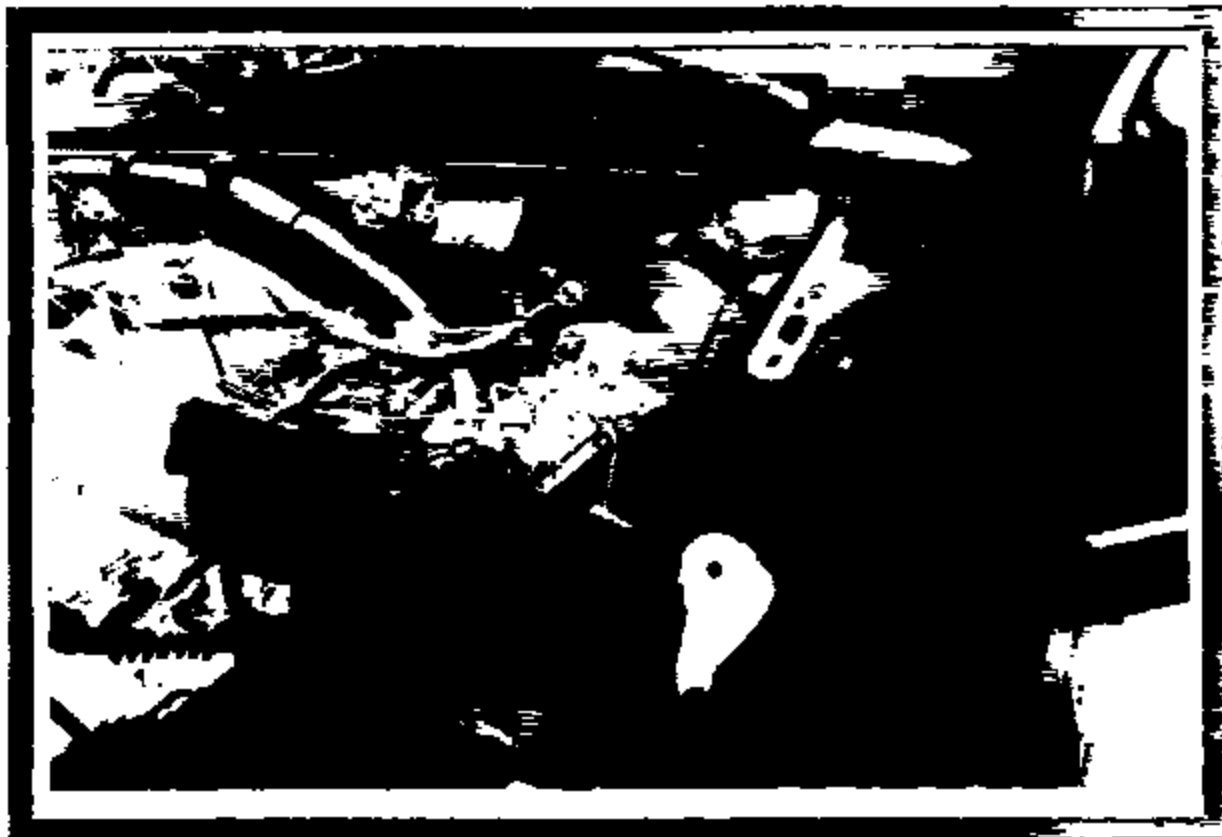
1154 Wind Hill Lane

Marietta, Ga. 30064

Telephone / Fax (770) 426-6173

or Toll Free (877) 328-3385

www.vehicleinvestigator.com



Photograph: #8

Transportation Technology No. 23162

Dates Taken: September 16, 2003

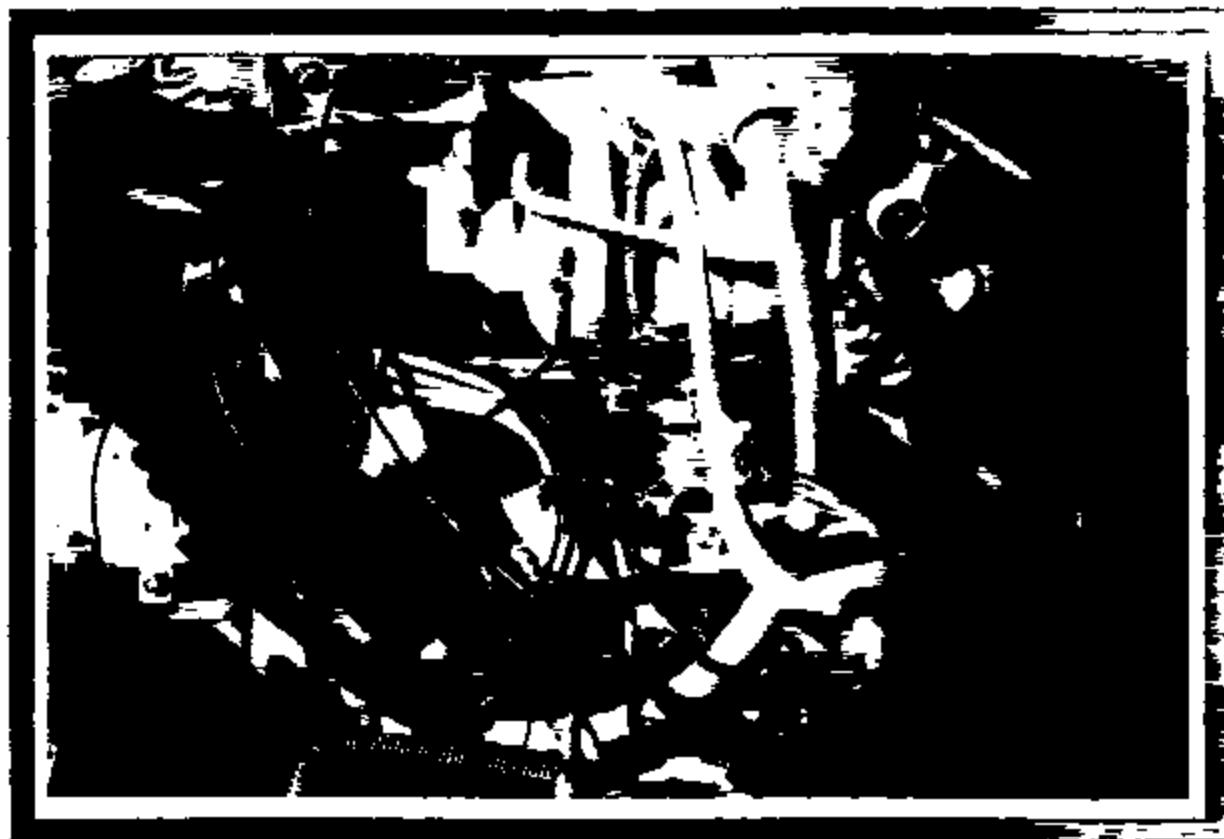
Description of Subject: Engine Compartment (driver's side)

Comments: Note: Fire damaged area.

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or Toll Free (877) 328-3385
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Photograph: #2 Transportation Technology No. 23162

Dates Taken: September 16, 2003

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

Comments: Note: Rubber hoses in the fire damaged area were intact.

Consulting Service

Transportation Technology

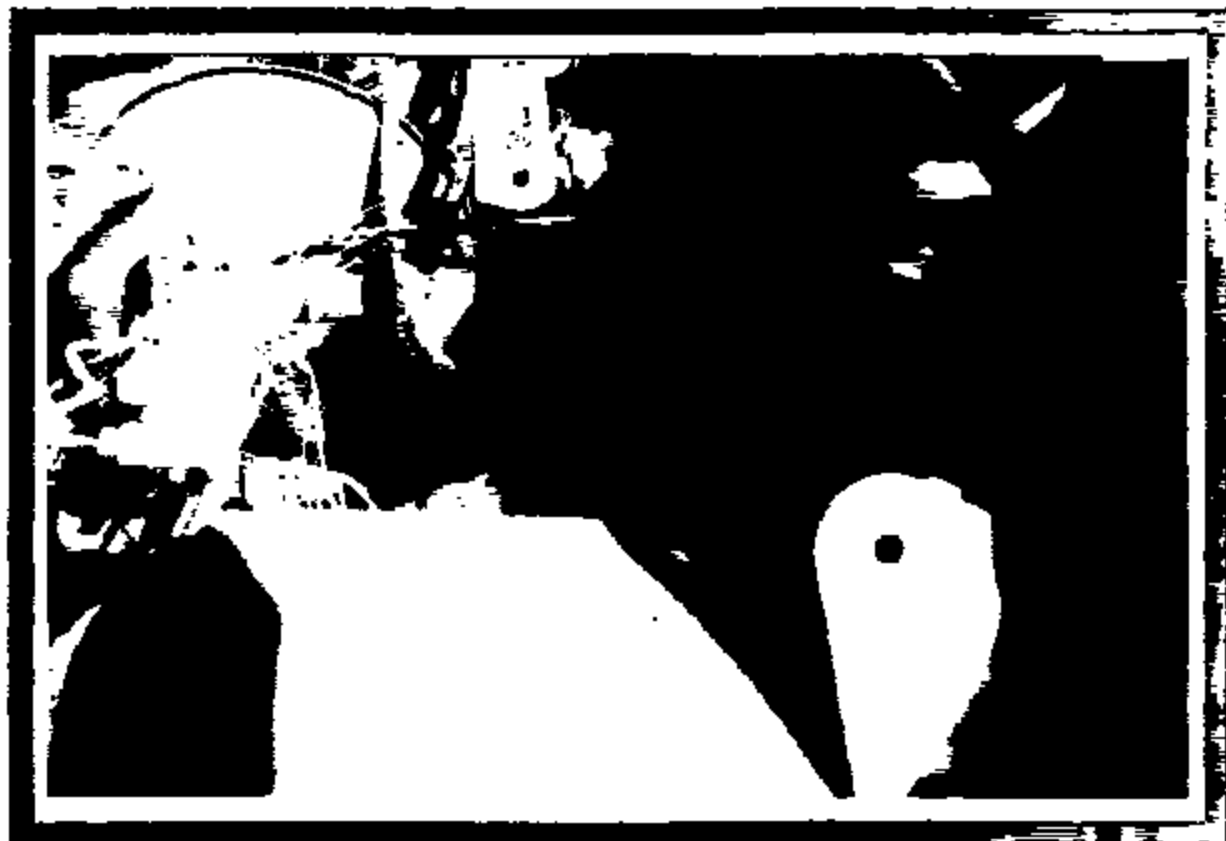
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or Toll Free (877) 328-3385

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Photograph: #19

Transportation Technology No. 23162

Dates Taken: September 16, 2003

Description of Subject: Brake Master Cylinder

Comments: Note: Melted brake fluid reservoir and associated wire damage.

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Marietta, Ga. 30064

Telephone / Fax (770) 426-6173

or Toll Free (877) 328-3385

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Photograph: #11

Transportation Technology No. 23162

Dates Taken: September 16, 2003

Description of Subject: Brake Master Cylinder

Comments: Note: Location of brake pressure switch.

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1184 Wind Hill Lane

Marietta, Ga. 30064

Telephone / Fax (770) 428-6173

or Toll Free (877) 328-3385

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Photograph: #12

Transportation Technology No. 23162

Dates Taken: September 16, 2003

Description of Subject: Brake Pressure Switch

Comments: Note: Melted copper contacts.

Consulting Service

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1184 Wind Hill Lane

Marietta, Ga. 30064

Telephone / Fax (770) 426-6173

or Toll Free (877) 328-3366

www.vehicleinvestigator.com



Photograph: #13 Transportation Technology No. 23182

Dates Taken: September 16, 2003

Description of Subject: Brake Pressure Switch

Comments: Note: Switch was removed from the master cylinder, labeled for identification and placed inside an evidence bag.



Allstate.

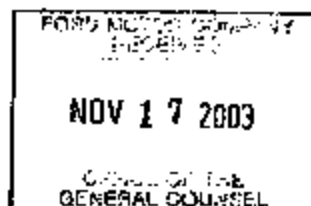
You're in good hands.

November 11, 2003

CERTIFIED MAIL #7001 0320 0005 0854 6061

Ford Motor Company
Parklane Towers West
#300
3 Parklane Blvd.
Dearborn, MI 48126-2568

RE: Claim #: [REDACTED]
Our Insured: [REDACTED]
Loss Date: 08 - 10 - 2003
Amt. of Claim: \$5,223.32



To Whom It May Concern:

The above noted subrogation claim has been identified as a product liability loss. In order to facilitate your handling, the information checked below is attached.

- ☒ Complete description of the incident: Defective Brake Pressure Switch
- ☒ Our statement of defect: See above
- ☒ Location of evidence: TRANSPORTATION TECH INC
- ☒ Manufacturer: Ford
- ☒ Model #: Bronco VEIN 1FMEU15H6T [REDACTED]
- ☒ Year: 1996

Attached are the following documents for your review:

- Copy of Cause and Origin with color photos
- Draft and Estimate for \$5223.32
- Fire Report

If you require information not listed above, please advise me promptly. If a tender is made to another manufacturer, please notify me of the name and address of the manufacturer or distributor, as well as the contact person. Otherwise, please acknowledge receipt of this claim and your position regarding payment of our damages within 30 days.

Thank you very much,
A. Gayle Hildreth
A. Gayle Hildreth, SCLA
Senior Subrogation Specialist

Enclosures

Roanoke National Subrogation Claims Center
3800 Electric Road, Suite 301, PO Box 21169, Roanoke, VA 24018
Phone: 1-800-776-2615 or (540) 989-2600 Fax: (540) 989-2640 or (540) 778-3803
Hours: 8:00 AM - 4:30 PM EST Monday - Friday

EA05-005-LC-8854

STATE COURT OF COBB COUNTY, GEORGIA, CIVIL ACTION #

Plaintiff: Allstate Insurance Company
(Our File #234-6803)

2004A11058-5

Defendant: Ford Motor Company

COMPLAINT FOR TORT OF NEGLIGENCE (PRODUCT LIABILITY)

STATEMENT OF FACTS

Allstate Insurance Company (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, XLT 2 door utility, V.I.N.: 1FMEU15H6TL [REDACTED] (hereinafter "said product") prior to August 10, 2003.

3. Prior August 10, 2003, [REDACTED] (hereinafter "Plaintiff's Insured") purchased said product in the stream of interstate commerce.

4. Thereafter, Plaintiff's Insured used said product for its intended purpose without abuse and without modification.

5. On or about August 10, 2003, said product caught fire due to a brake pressure switch failure (hereinafter "defective part").

6. As a result of the casualty described in the previous paragraph, property owned Plaintiff's Insured was damaged in the amount of \$5,331.32 (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.

9. As a result, Defendant is liable as tortfeasor in the amount of \$5,331.32 (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 NEGLIGENT DESIGNING; NEGLIGENT TESTING;
NEGLIGENT MANUFACTURING; NEGLIGENT ASSEMBLY; NEGLIGENT INSPECTION;
NEGLIGENT MARKETING; AND, NEGLIGENT 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

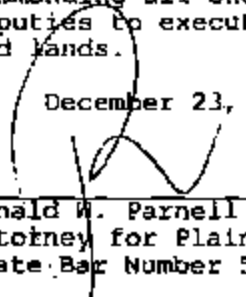
merchantable, nor was it reasonably suited for the use intended, and as such, Defendant breached the express and implied warranties of fitness for a particular purpose and of merchantability in that the defective part in said product posed an unreasonable risk of serious injury and death to its users 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

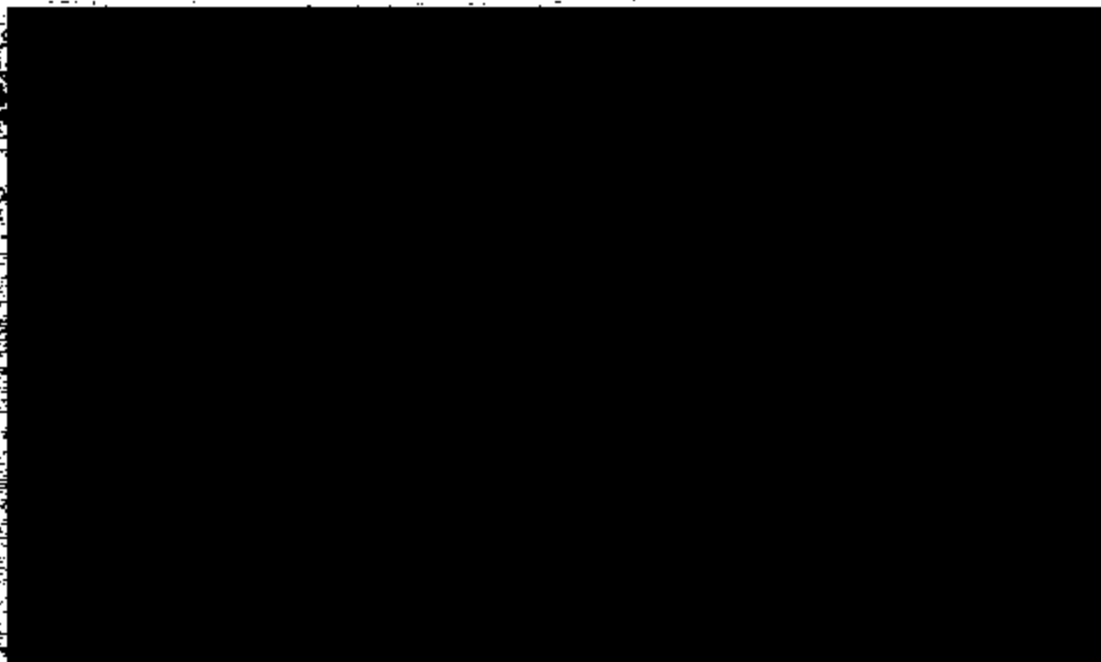
WHEREFORE, Plaintiff demands judgment against Defendant in the amount of \$5,331.32 (salvage is undetermined), plus 3% pre-judgment interest, one-third attorney fees in the event of default, costs and 3% post-judgment interest; and that a writ of fieri facias issue commanding all Sheriffs within the 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 #234-6803
Post Office Drawer 81085
Conyers, Georgia 30013
(770) 929-8585 Answer Service



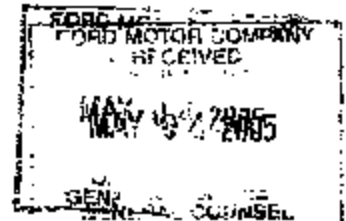
State Farm Insurance Companies



April 28, 2005

P.O. Box 9613
Winter Haven, FL 33893-9613
(800) 301-7350

Ford Motor Company Parklane Towers West #400
3 Parklane Blvd
Dearborn, MI 48128-2568



RE: Claim Number : [REDACTED]
Date of Loss : April 10, 2005
Our Insured : Jerry D Jordan
Your Reference: VIN: 1FTRX08L8XK [REDACTED]

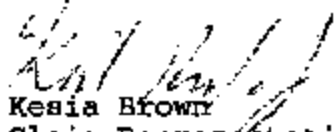
Dear Sir/Madam:

The identified 1999 Ford F150 VIN: 1FTRX08L8XK [REDACTED] is insured by State Farm Insurance. This 99 Ford F150 experienced a fire.

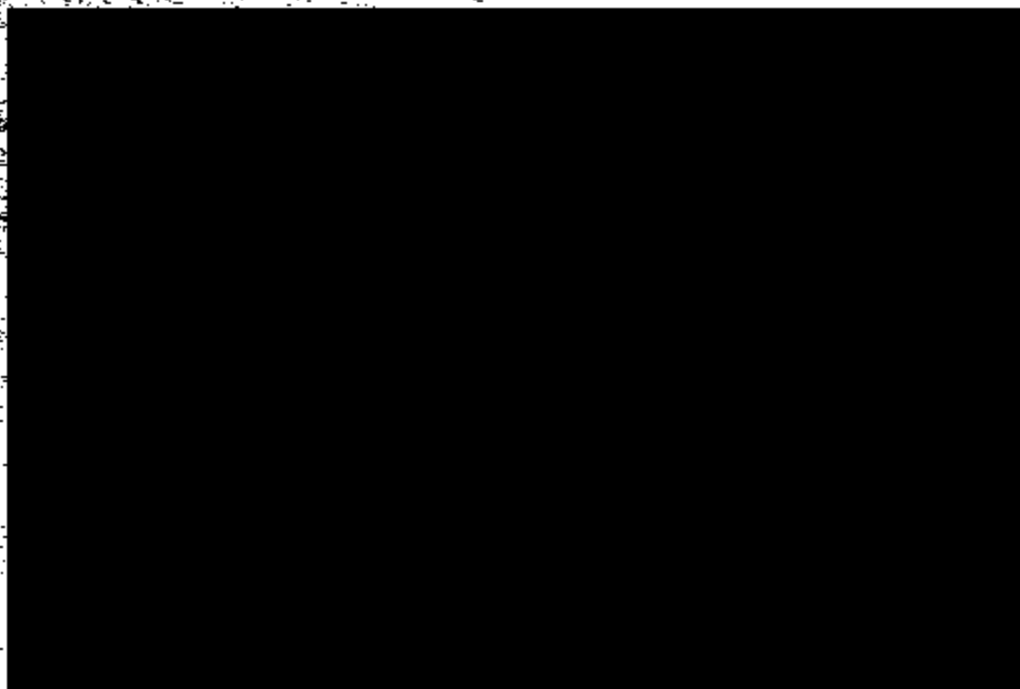
State Farm would like to give you an opportunity to inspect the vehicle and give you advance notice of our potential subrogation claim.

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

Sincerely,


Kesia Brown
Claim Representative
(800) 301-7350

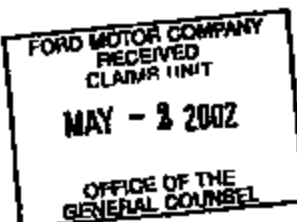
State Farm Mutual Automobile Insurance Company



State Farm Insurance Companies



April 30, 2002



Claim Service Center
9 Plaza Drive
P.O. Box 831
Portsmouth, Ohio 45662
(740) 354-6800
(740) 354-6855 / fax

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

RE: Claim Number: [REDACTED]
Date of Loss: March 20, 2002
Insured: [REDACTED]
Subject: 1999 Ford Ranger XLT vin # 1FTZR15V8X [REDACTED]

Dear Ford Motor Co.:

The identified 1999 Ford Ranger XLT is insured by State Farm Mutual Automobile Insurance Company. This Ford Ranger experience an engine compartment fire.

State Farm would like to give you an opportunity to inspect the vehicle and give you advance notice of our potential subrogation claim. The vehicle is located at Auto Disposal Systems in Ashland, KY. Their phone number is 1-800-910-4270. The stock # is 2219830. They are keeping the car covered and inside.

Should you have any questions, please do not hesitate to call. If this is a long distance call, please call toll free at 1-800-897-5046.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Kristen Angus'.

Kristen Angus
Claim Representative
(740) 354-6832

State Farm Mutual Automobile Insurance Company

KA

VIN: 1FTZR15V8XTA Year: 1999 Model: RANGER
Owner Status: ORIGINAL WSD: 03/17/99 Mileage: 24783
Name: Hm Ph:
Trmt: Case: 646460849 Day Ph:
Symptom: CLIMATE CONTROL VISIBLE LEAKS
Reason: LEGAL - MULTIPLE CONSUMER LAW CLAIMS
Dealer: BERT WOLFE FORD INC
Issue Type: 07 LEGAL CAN Court: Legal Issue Type:
Issue Status: C CLOSED CAN Award: MORSII Contact: N

A/C DATE Origin Description

07/06/00 CALGL OPEN LEGAL CONTACT - ATTORNEY DEMAND
07/07/00 CALGL MAKE OUTBOUND CALL TO ATTORNEY
08/08/00 CALGL DENY ASSISTANCE - ABUSE

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

SFCHADMA

Action Detail

05/09/02 15:55:00

VIN: 1FTZR15V8XT Year: 1999 Model: RANGER
Owner Status: ORIGINAL WSD: 03/17/99
Name: Hm Ph: [REDACTED]
Trmt: Case: 646460849 Day Ph: [REDACTED]
Symptom Desc: CLIMATE CONTROL VISIBLE LEAKS
Reason Desc: LEGAL - MULTIPLE CONSUMER LAW CLAIMS
Dealer: BERT WOLFE FORD INC
Issue Type: 07 LEGAL Issue Status: C CLOSED
Comm Type: FX FAX Odometer Reading: 24783 MI
Analyst: SCHAMPI2 STEPHANIE CHAMPION Document Number:
Action Date: 07/06/00 Action Data: Y Action Time: 17:06:49 EST
Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION
Action Desc: OPEN LEGAL CONTACT - ATTORNEY DEMAND
Comments: *****ATTORNEY DEMAND LETTER*****

REC'06/29/00

ATTORNEY ALLEGES DEFECTIVE VEHICLE BASED UPON NUMEROUS
ATTEMPTS MADE TO CORRECT PROBLEMS WITH THE VEHICLE.
**ATTORNEY DEMANDS FORD TO BUYBACK VEHICLE AND ISSUE A
REFUND TO CLIENT.**

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

SFCHADMA

Action Detail

05/09/02 15:55:04

VIN: 1FTZR15V8XT Year: 1999 Model: RANGER
Owner Status: ORIGINAL WSD: 03/17/99
Name: Hm Ph: [REDACTED]
Trmt: Case: 646460849 Day Ph: [REDACTED]
Symptom Desc: CLIMATE CONTROL VISIBLE LEAKS
Reason Desc: LEGAL - MULTIPLE CONSUMER LAW CLAIMS
Dealer: BERT WOLFE FORD INC
Issue Type: 07 LEGAL Issue Status: C CLOSED
Comm Type: FX FAX Odometer Reading: 24783 MI
Analyst: 9342LE LANDRE EAGLETON Document Number:
Action Date: 07/07/00 Action Data: Y Action Time: 15:58:40 EST
Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION
Action Desc: MAKE OUTBOUND CALL TO ATTORNEY
Comments: I SPOKE WITH JOHN HOYER (CUSTOMER'S ATTNY). JOHN INDICATED
HE WOULD HAVE HIS CLIENT TO CONTACT THE DEALER FOR REVIEW
OF VEHICLE CONCERNS. I ADVISED JOHN THE VEHICLE NEEDED TO
BE REVIEWED TO DETERMINE THE EXTENT OF ACTUAL FACTORY
DEFECTS VS CLIENT USE CONCERNS. JOHN NOTED HE WOULD
RECONTACT ME AS SOON AS THEY ARE ABLE TO MAKE ARRANGEMENTS

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

QGDB427

SFCHADMA

Action Detail

05/09/02 15:55:06

⇒
VIN: IFTZR15V8X Year: 1999 Model: RANGER
Owner Status: ORIGINAL WSD: 03/17/99
Name: Hb Ph:
Tmt: Case: 646460849 Day Ph:
Symptom Desc: CLIMATE CONTROL VISIBLE LEAKS
Reason Desc: LEGAL - MULTIPLE CONSUMER LAW CLAIMS
Dealer: BERT WOLFE FORD INC
Issue Type: 07 LEGAL Issue Status: C CLOSED
Comm Type: FX FAX Odometer Reading: 24783 MI
Analyst: 9342LE LANDRE EAGLETON Document Number:
Action Date: 07/07/00 Action Data: Y Action Time: 15:58:40 EST
Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION
Action Desc: MAKE OUTBOUND CALL TO ATTORNEY
Comments: RECONTACT ME AS SOON AS THEY ARE ABLE TO MAKE ARRANGEMENTS
TO HAVE THE VEHICLE TAKE TO THE DEALERSHIP.

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

OGD8427

SFCHADMA

Action Detail

05/09/02 15:55:08

VIN: 1FTZR15V8XT Year: 1999 Model: RANGER
Owner Status: ORIGINAL WSD: 03/17/99
Name: Hm Ph: [REDACTED]
Trmt: Case: 646460849 Day Ph: [REDACTED]
Symptom Desc: CLIMATE CONTROL VISIBLE LEAKS
Reason Desc: LEGAL - MULTIPLE CONSUMER LAW CLAIMS
Dealer: BERT WOLFE FORD INC
Issue Type: 07 LEGAL Issue Status: C CLOSED
Comm Type: FX FAX Odometer Reading: 24783 MI
Analyst: 9342LE LANDRE EAGLETON Document Number:
Action Date: 08/08/00 Action Data: N Action Time: 17:09:18 EST
Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION
Action Desc: DENY ASSISTANCE - ABUSE
Comments: JAMIE SIX ALONG WITH THE CUSTOMER SERVICE ENGINEER HAVE
REVIEWED THE VEHICLE AND DETERMINED THERE WERE NO
VERIFIABLE FACTORY DEFECTS. DETERMINATION WAS MADE NOTING
SOME OF THE CUSTOMER COMPLAINTS ARE RELATED TO CUSTOMER'S
USE OF THE VEHICLE, AND LIKELY OFF-ROAD CONTRIBUTING TO
SOME OF THE COMPLAINT. I CONTACTED JOHN HOYER CUSTOMER'S
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

05/09/02 15:55:10

→
VIN: 1FTZR15V8XT Year: 1999 Model: RANGER
Owner Status: ORIGINAL WSD: 03/17/99
Name: Hm Ph: [REDACTED]
Trmt: Case: 646460849 Day Ph: [REDACTED]
Symptom Desc: CLIMATE CONTROL VISIBLE LEAKS
Reason Desc: LEGAL - MULTIPLE CONSUMER LAW CLAIMS
Dealer: BERT WOLFE FORD INC
Issue Type: 07 LEGAL Issue Status: C CLOSED
Comm Type: FX FAX Odometer Reading: 24783 MI
Analyst: 9342LE LANDRE EAGLETON Document Number:
Action Date: 08/08/00 Action Data: N Action Time: 17:09:18 EST
Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION
Action Desc: DENY ASSISTANCE - ABUSE
Comments: SOME OF THE COMPLAINT. I CONTACTED JOHN HOYER CUSTOMER'S
ATTORNEY AND ADVISED, NO VERIFIABLE DEFECTS WERE FOUND, AND
SOME CONCERNS MAY BE RELATED TO HIS CLIENTS USE OF THE
VEHICLE.
JOHN HOYER NOTED HE WOULD SPEAK WITH HIS CLIENT AFTER
RECEIVING CLOSING R.O. FROM THE DEALER. I ADVISED THE
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

05/09/02 15:55:11

VIN: 1FTZR15V8XT [REDACTED] Year: 1999 Model: RANGER
Owner Status: ORIGINAL WSD: 03/17/99
Name: [REDACTED] Hm Ph: [REDACTED]
Trmt: [REDACTED] Case: 646460849 Day Ph: [REDACTED]
Symptom Desc: CLIMATE CONTROL VISIBLE LEAKS
Reason Desc: LEGAL - MULTIPLE CONSUMER LAW CLAIMS
Dealer: BERT WOLFE FORD INC
Issue Type: 07 LEGAL Issue Status: C CLOSED
Comm Type: FX FAX Odometer Reading: 24783 MI
Analyst: 9342LE LANDRE EAGLETON Document Number:
Action Date: 08/08/00 Action Data: N Action Time: 17:09:18 EST
Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION
Action Desc: DENY ASSISTANCE - ABUSE
Comments: RECEIVING CLOSING R.O. FROM THE DEALER. I ADVISED THE
RO WOULD NOTE THEY WERE UNABLE TO CONFIRM ANY CONCERNS
RELATED TO A FACTORY DEFECT

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

VIN: 1FTZR15V8X [REDACTED] Year: 1999 Model: RANGER
Owner Status: ORIGINAL MSD: 03/17/99 Mileage: 25000
Name: [REDACTED] Hm Ph: [REDACTED]
Trmt: Case: 646460849 Day Ph:
Symptom: TIRES/WHEELS WHEEL COVERS
Reason: WARRANTY - MULTIPLE REPAIR
Dealer: BERT WOLFE FORD INC
Issue Type: 03 CONCERN CAN Court: Legal Issue Type:
Issue Status: C CLOSED CAN Award: MORISII Contact: N

A/C DATE Origin Description

01/25/00 CACI38 ADVISE CUST INFO WILL BE SENT TO DLR; CONTACT CRM
02/11/00 DEALER UNABLE TO CONTACT CUSTOMER 3 TIMES

F1=Help F2=AddAction F4=ActionDetail F6=DealerInfo
F7=Prev F8=Next F9=ViewMORISII F11=Menu F12=Return
NO MORE RECORDS AVAILABLE OADB427

SFCHADMA

Action Detail

05/09/02 15:55:46

VIN: 1FTZR15V8XT [REDACTED] Year: 1999 Model: RANGER
Owner Status: ORIGINAL WSD: 03/17/99
Name: [REDACTED] Hm Ph: [REDACTED]
Trmt: Case: 646460849 Day Ph: [REDACTED]
Symptom Desc: TIRES/WHEELS WHEEL COVERS
Reason Desc: WARRANTY - MULTIPLE REPAIR
Dealer: BERT WOLFE FORD INC
Issue Type: 03 CONCERN Issue Status: C CLOSED
Comm Type: SV SURVEY Odometer Reading: 25000 MI
Analyst: SPRESCOT SUSAN PRESCOTT Document Number: 1322395
Action Date: 01/25/00 Action Data: Action Time: 12:29:34 EST
Origin Desc: US CONCERN CASE BASE
Action Desc: ADVISE CUST INFO WILL BE SENT TO DLR; CONTACT CRM
Comments: CUSTOMER SAYS: -CUST SURVEY NOT DATED -CUST STATES THAT
THE DLRSHOULD BE SHUT DOWN AS HE HAS HAD HIS VEHICLE IN
TWICE AND HE HAS TO TAKE IT BACK FOR THE SAME THING -CUST S
TATES THAT VERY BAD SERVICE, HE PLANS TO TAKE CARE OF THE PR
OBLEM *****ON OUTBOUND CALL*****
***** -CUST STATES THAT THE PROBLEMS WITH THE VEHICLE WA
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

05/09/02 15:55:49

VIN: 1FTZR15V8XT Year: 1999 Model: RANGER
Owner Status: ORIGINAL WSD: 03/17/99
Name: Hm Ph:
Trmt: Case: 646460849 Day Ph:
Symptom Desc: TIRES/WHEELS WHEEL COVERS
Reason Desc: WARRANTY - MULTIPLE REPAIR
Dealer: BERT WOLFE FORD INC
Issue Type: 03 CONCERN Issue Status: C CLOSED
Comm Type: SV SURVEY Odometer Reading: 25000 MI
Analyst: SPRESCOT SUSAN PRESCOTT Document Number: 1322395
Action Date: 01/25/00 Action Data: Action Time: 12:29:34 EST
Origin Desc: US CONCERN CASE BASE
Action Desc: ADVISE CUST INFO WILL BE SENT TO DLR; CONTACT CRM
Comments: ***** -CUST STATES THAT THE PROBLEMS WITH THE VEHICLE WA
S THE HUBS AND THE TRANSMISSION. -CUST WAS LEFT WITHOUT A V
EHICLE FOR 3 DAYS AND THEY FINALLY GAVE HIM -CUST STATED TH
AT THE BACK GLASS NEEDED TO BE REPAIRED AS IT WAS LEAKING.
-CUST STATES THAT THE HUBS ARE STILL GIVING HIM PROBLEM. -C
UST STATES THAT THE DLRSHIP TOLD HIM THAT THE VEHICLE CAME WI

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

OQDB427

SFCHADMA

Action Detail

05/09/02 15:55:50

VIN: 1FTZR15V8XT [REDACTED] Year: 1999 Model: RANGER
Owner Status: ORIGINAL WSD: 03/17/99
Name: [REDACTED] Hm Ph: [REDACTED]
Trmt: [REDACTED] Case: 646460849 Day Ph: [REDACTED]
Symptom Desc: TIRES/WHEELS WHEEL COVERS
Reason Desc: WARRANTY - MULTIPLE REPAIR
Dealer: BERT WOLFE FORD INC
Issue Type: 03 CONCERN Issue Status: C CLOSED
Comm Type: SV SURVEY Odometer Reading: 25000 MI
Analyst: SPRESCOT SUSAN PRESCOTT Document Number: 1322395
Action Date: 01/25/00 Action Data: Action Time: 12:29:34 EST
Origin Desc: US CONCERN CASE BASE
Action Desc: ADVISE CUST INFO WILL BE SENT TO DLR; CONTACT CRM
Comments: UST STATES THAT THE DLRSHIP TOLD HIM THAT THE VEHICLE CAME WI
TH A FULL SIZE SPARE TIRE AND WHEN HE WENT TO CHANGE THE TIR
E THE OTHER DAY IT WAS NOT A FULL SIZE. PER CUSTOMER, DEALE
R SAYS: CAC ADVISED: - VEHICLE UNDER BUMPER-TO-BUMPER W
ARRANTY - WILL FORWARD INFORMATION TO THE DEALERSHIP, WITH
A COPY TO THE REGIONAL OFFICE - WILL REQUEST CRM/SERVICE MA
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

05/09/02 15:55:51

⇒
VIN: 1FTZR15V8XT Year: 1999 Model: RANGER
Owner Status: ORIGINAL WSD: 03/17/99
Name: Hm Ph:
Trmt: Case: 646460849 Day Ph:
Symptom Desc: TIRES/WHEELS WHEEL COVERS
Reason Desc: WARRANTY - MULTIPLE REPAIR
Dealer: BERT WOLFE FORD INC
Issue Type: 03 CONCERN Issue Status: C CLOSED
Comm Type: SV SURVEY Odometer Reading: 25000 MI
Analyst: SPRESCOT SUSAN PRESCOTT Document Number: 1322395
Action Date: 01/25/00 Action Data: Action Time: 12:29:34 EST
Origin Desc: US CONCERN CASE BASE
Action Desc: ADVISE CUST INFO WILL BE SENT TO DLR; CONTACT CRM
Comments: A COPY TO THE REGIONAL OFFICE - WILL REQUEST CRM/SERVICE MA
NAGER CONTACT CUSTOMER WITHIN 2 BUSINESS DAYS INFERENCE CASE
ID: 4569

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

SFCHADMA

Action Detail

05/09/02 15:55:53

VIN: 1FTZR15V8XHA2500 Year: 1999 Model: RANGER
Owner Status: ORIGINAL WSD: 03/17/00
Name: [REDACTED] Hm Ph: [REDACTED]
Trat: [REDACTED] Case: 646460849 Day Ph: [REDACTED]
Symptom Desc: TIRES/WHEELS WHEEL COVERS
Reason Desc: WARRANTY - MULTIPLE REPAIR
Dealer: BERT WOLFE FORD INC
Issue Type: 03 CONCERN Issue Status: C CLOSED
Comm Type: SV SURVEY Odometer Reading: 25000 MI
Analyst: F47204 BERT WOLFE FORD INC Document Number:
Action Date: 02/11/00 Action Data: N Action Time: 09:51:23 EST
Origin Desc: DEALER
Action Desc: UNABLE TO CONTACT CUSTOMER 3 TIMES
Comments: CALLED SEVERAL TIMES LEFT MESSAGES TO CALL AND SCHEDULE AN AP
POINTMENT TO THIS DATE CUSTOMER HAS NOT YET MADE AN APPOINTM
ENT

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

SFCHIDMA

Issue Detail

05/09/02 15:56:04

VIN: 1FTZR15V8XT [REDACTED] Year: 1999 Model: RANGER
Owner Status: ORIGINAL [REDACTED] Date: 03/17/99 Mileage: 25000
Name: [REDACTED] Hm Ph: [REDACTED]
Trmt: [REDACTED] Case: 646460849 Day Ph: [REDACTED]
Symptom:
Reason: MISC INQUIRY - CSR OBC
Dealer: BERT WOLFE FORD INC
Issue Type: 01 INQUIRY CAN Court: Legal Issue Type:
Issue Status: C CLOSED CAN Award: MORSEII Contact: N

A/C DATE Origin Description

01/25/00 CACM03 CUSTOMER FOCUS - MADE CONTACT/PROVIDED RESOLUTION

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

SFCHADMA

Action Detail

05/09/02 15:56:08

VIN: 1FTZR15V8XT Year: 1999 Model: RANGER
Owner Status: ORIGINAL WSD: 03/17/00
Name: Hm Ph:
Trmt: Case: 646460849 Day Ph:
Symptom Desc:
Reason Desc: MISC INQUIRY - CSR OBC
Dealer: BERT WOLFE FORD INC
Issue Type: 01 INQUIRY Issue Status: C CLOSED
Comm Type: SV SURVEY Odometer Reading: 25000 MI
Analyst: SPRESCOT SUSAN PRESCOTT Document Number: 1322395
Action Date: 01/25/00 Action Data: Action Time: 12:29:35 EST
Origin Desc: MANUAL - CORRESPONDENCE CSR
Action Desc: CUSTOMER FOCUS - MADE CONTACT/PROVIDED RESOLUTION
Comments: CUSTOMER SAYS: -CUST SURVEY NOT DATED -CUST STATES THAT
THE DLRSHp SHOULD BE SHUT DOWN AS HE HAS HAD HIS VEHICLE IN
TWICE AND HE HAS TO TAKE IT BACK FOR THE SAME THING -CUST S
TATES THAT VERY BAD SERVICE, HE PLANS TO TAKE CARE OF THE PR
OBLEM *****ON OUTBOUND CALL*****
***** -CUST STATES THAT THE PROBLEMS WITH THE VEHICLE WA
F1=Help F2=AddAction F4=PrevAction F5=NextAction F6=ActionData
F9=PrevComments F10=NextComments F11=Menu F12=Return F13=ESP
MORE COMMENTS AVAILABLE

OGB427

SFCHADMA

Action Detail

05/09/02 15:56:10

VIN: 1FTZR15V8X Year: 1999 Model: RANGER
Owner Status: ORIGINAL WSD: 03/17/99
Name: Hm Ph:
Print: Case: 646460849 Day Ph:
Symptom Desc:
Reason Desc: MISC INQUIRY - CSR OBC
Dealer: BERT WOLFE FORD INC
Issue Type: 01 INQUIRY Issue Status: C CLOSED
Comm Type: SV SURVEY Odometer Reading: 25000 MI
Analyst: SPRESCOT SUSAN PRESCOTT Document Number: 1322395
Action Date: 01/25/00 Action Data: Action Time: 12:29:35 EST
Origin Desc: MANUAL - CORRESPONDENCE CSR
Action Desc: CUSTOMER FOCUS - MADE CONTACT/PROVIDED RESOLUTION
Comments: ***** -CUST STATES THAT THE PROBLEMS WITH THE VEHICLE WA
S THE HUBS AND THE TRANSMISSION. -CUST WAS LEFT WITHOUT A V
EHICLE FOR 3 DAYS AND THEY FINALLY GAVE HIM -CUST STATED TH
AT THE BACK GLASS NEEDED TO BE REPAIRED AS IT WAS LEAKING.
-CUST STATES THAT THE HUBS ARE STILL GIVING HIM PROBLEM. -C
UST STATES THAT THE DLRSHIP TOLD HIM THAT THE VEHICLE CAME WI

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

05/09/02 15:56:11

VIN: 1FTZR15V8X Year: 1999 Model: RANGER
Owner Status: ORIGINAL WSD: 03/17/99
Name: Hm Ph:
Trmt: Case: 646460849 Day Ph:
Symptom Desc:
Reason Desc: MISC INQUIRY - CSR OBC
Dealer: BERT WOLFE FORD INC
Issue Type: 01 INQUIRY Issue Status: C CLOSED
Comm Type: SV SURVEY Odometer Reading: 25000 MI
Analyst: SPRESCOT SUSAN PRESCOTT Document Number: 1322395
Action Date: 01/25/00 Action Data: Action Time: 12:29:35 EST
Origin Desc: MANUAL - CORRESPONDENCE CSR
Action Desc: CUSTOMER FOCUS - MADE CONTACT/PROVIDED RESOLUTION
Comments: UST STATES THAT THE DLR5HP TOLD HIM THAT THE VEHICLE CAME WITH A FULL SIZE SPARE TIRE AND WHEN HE WENT TO CHANGE THE TIRE THE OTHER DAY IT WAS NOT A FULL SIZE. PER CUSTOMER, DEALER SAYS: CAC ADVISED: -SPOKE WITH THE CUST AND PROVIDED THE FOLLOWING: - VEHICLE UNDER BUMPER-TO-BUMPER WARRANTY - WILL FORWARD INFORMATION TO THE DEALERSHIP, WITH A COPY TO

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

05/09/02 15:56:12

VIN: 1FTZR15V8XT Year: 1999 Model: RANGER
Owner Status: ORIGINAL WSD: 03/17/99
Name: Hm Ph:
Trmt: Case: 646460849 Day Ph:
Symptom Desc:
Reason Desc: MISC INQUIRY - CSR OBC
Dealer: BERT WOLFE FORD INC
Issue Type: 01 INQUIRY Issue Status: C CLOSED
Comm Type: SV SURVEY Odometer Reading: 25000 MI
Analyst: SPRESCOT SUSAN PRESCOTT Document Number: 1322395
Action Date: 01/25/00 Action Data: Action Time: 12:29:35 EST
Origin Desc: MANUAL - CORRESPONDENCE CSR
Action Desc: CUSTOMER FOCUS - MADE CONTACT/PROVIDED RESOLUTION
Comments: WILL FORWARD INFORMATION TO THE DEALERSHIP, WITH A COPY TO
THE REGIONAL OFFICE - WILL REQUEST CRM/SERVICE MANAGER CONT
ACT CUSTOMER WITHIN 2 BUSINESS DAYS

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

SFCHIDMA

Issue Detail

05/09/02 15:56:59

VIN: 1FTZR15V8X Year: 1999 Model: RANGER
Owner Status: ORIGINAL WSD: 03/17/99 Mileage: 400
Name: Hm Ph:
Trmt: Case: 646460849 Day Ph:
Symptom:
Reason: SALES - INCENTIVE AND REBATES
Dealer:
Issue Type: 01 INQUIRY CAN Court: Legal Issue Type:
Issue Status: C CLOSED CAN Award: MORSII Contact: N

A/C DATE Origin Description

03/25/99 CACIO8 PROVIDE INFORMATION USING AVAILABLE RESOURCES

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

VIN: 1FTZR15V8XT Year: 1999 Model: RANGER
Owner Status: ORIGINAL WSD: 03/17/99
Name: Hm Ph: ()
Trmt: Case: 646460849 Day Ph: ()
Symptom Desc:
Reason Desc: SALES - INCENTIVE AND REBATES
Dealer:
Issue Type: 01 INQUIRY Issue Status: C CLOSED
Comm Type: PH PHONE Odometer Reading: 400 MI
Analyst: KSMITH81 KAREN SMITH Document Number:
Action Date: 03/25/99 Action Data: Action Time: 13:58:56 EST
Origin Desc: US INQUIRY CASE BASE
Action Desc: PROVIDE INFORMATION USING AVAILABLE RESOURCES
Comments: CUSTOMER SAYS: THE CUST WANTS TO KNOW ABOUT A 41000 REBAT
E FOR THE 99 RANGER, AND HE PURCHASED IT LAST WEDNESDAY. PER
CUSTOMER, DEALER SAYS: NONE CAC ADVISED: - PROVIDE INCE
NTIVE INFORMATION - DEALERS MAY ALSO PROVIDE ADDITIONAL INC
ENTIVES THAT ARE NOT ADMINISTERED BY FORD MOTOR COMPANY - P
ARTICIPATION IN LOCAL DEALERSHIP INCENTIVES IS VOLUNTARY BAS
F1=Help F2=AddAction F4=PrevAction F5=NextAction F6=ActionData
F9=PrevComments F10=NextComments F11=Menu F12=Return F13=ESP
MORE COMMENTS AVAILABLE

OGD8427

SFCHADMA

Action Detail

05/09/02 15:57:04

VIN: 1FTZR15V8X Year: 1999 Model: RANGER
Owner Status: ORIGINAL WSD: 03/17/99
Name: Hm Ph: [REDACTED]
Trmt: Case: 646460849 Day Ph: [REDACTED]
Symptom Desc:
Reason Desc: SALES - INCENTIVE AND REBATES
Dealer:
Issue Type: 01 INQUIRY Issue Status: C CLOSED
Comm Type: PH PHONE Odometer Reading: 400 MI
Analyst: KSMITH81 KAREN SMITH Document Number:
Action Date: 03/25/99 Action Data: Action Time: 13:58:56 EST
Origin Desc: US INQUIRY CASE BASE
Action Desc: PROVIDE INFORMATION USING AVAILABLE RESOURCES
Comments: PARTICIPATION IN LOCAL DEALERSHIP INCENTIVES IS VOLUNTARY BASED ON INDIVIDUAL DEALERS INVENTORY LEVELS- WE WOULD NOT BE ABLE TO GIVE YOU INFORMATION ON HOW LONG A REBATE CHECK WOULD BE ABLE TO COME TO YOU. INFERENCE CASE ID: 485

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



FILED
COMMON PLEAS COURT
2003 JUN -21 A 8:41
MARIE PARKS
CLERK OF COURTS
MADISON CO. OHIO

IN THE COMMON PLEAS COURT
MADISON COUNTY, OHIO

[REDACTED]

Canton, Ohio

Plaintiff,

vs.

FORD MOTOR COMPANY
c/o Statutory Agent
CT Corporation Systems
1300 E. 9th Street
Cleveland, Ohio 44114

Defendant.

CASE NO. 2003 CV.06-185

JUDGE:

COMPLAINT WITH FIRST
SET OF INTERROGATORIES
AND REQUEST FOR
PRODUCTION OF DOCUMENTS

1. [REDACTED] ("Nationwide") is an Ohio corporation with a principal place of business in Columbus, Ohio.
2. Defendant Ford Motor Company ("Ford") is a Delaware corporation with a principal place of business in Michigan. Ford transacts business throughout the United States, including Ohio. Ford has designated CT Corporation System, 815 Superior Avenue, N.E., Cleveland, Ohio 44114 as its Statutory Agent for service of process in the State of Ohio.
3. At all relevant times [REDACTED] owned a 2000 Ford Explorer (VIN No. 1FMDU85PXY2 [REDACTED]) which was titled in Franklin County, Ohio.

4. [REDACTED] issued a policy of insurance bearing policy no [REDACTED]
[REDACTED] for Kaho's 2000 Ford Explorer.

FIRST CLAIM FOR RELIEF

5. Plaintiff restates paragraphs 1 through 4 of this Complaint.
6. On April 12, 2002, Kaho's 2000 Ford Explorer was destroyed by fire.
7. Upon investigation, it was determined that the fire was caused by a defective electrical component within the 2000 Ford Explorer.
8. The fire and resulting damage was caused by the negligence of Defendant Ford, its agents, servants, and employees, acting within the scope of their agency or employment in:
- (a) supplying a defectively-manufactured or designed product that it new or should have known subjected the property owners to an unreasonable risk of harm;
 - (b) failing to adequately, properly, and safely design, manufacture, inspect, and test the 2000 Ford Explorer and to make the necessary adjustments and corrections, which inspections or test would have revealed the existence of its dangerous and defective condition;
 - (c) failing to exercise reasonable care in the selection of component parts and devices for the 2000 Ford Explorer;
 - (d) failing to select and utilize more durable and reliable control and safety devices with respect to the 2000 Ford Explorer;
 - (e) failing to notify the owner of the inherent dangers of the 2000 Ford Explorer when they knew or should have known that the design of the equipment and component parts were dangerous and defective; and
 - (f) otherwise failing to use due care under the circumstances.

9. [REDACTED] has sustained damages totaling in excess of \$23,892.00 as a proximate result of Defendant Ford's actions.

SECOND CLAIM FOR RELIEF

10. Plaintiff restates paragraphs 1 through 9 of this Complaint.

11. In designing, manufacturing, supplying, and selling the 2000 Ford Explorer to Nationwide's insured, Defendant Ford expressly and impliedly warranted the car as good and of merchantable quality and fit for the purposes for which products of that nature are ordinarily and foreseeably used.

12. [REDACTED] sustained damages totaling in excess of \$23,892.00 as a result of Defendant Ford's breaches of its express and implied warranties.

THIRD CLAIM FOR RELIEF

13. Plaintiff restates paragraphs 1 through 12 of this Complaint.

14. The fire and resulting damage was proximately caused by Defendant Ford's strict liability-producing conduct in:

- (a) designing, manufacturing, and supplying a defective product that it knew or should have known subjected Nationwide's insured to an unreasonable risk of harm;
- (b) manufacturing a product in a defective condition and reasonably dangerous to Nationwide's insured and her property; and
- (c) failing to warn Nationwide's insureds of the aforesaid dangerous condition.

15. The 2000 Ford Explorer deviated in a material way from the design specification and performance standards of Ford and deviated from otherwise identical units manufactured to the same design specification or performance standards when it left Ford's control.

16. [REDACTED] has sustained damage in an amount in excess of \$23,892.00 as a proximate result of Defendant Ford's product, for which it is strictly liable in tort.

WHEREFORE, Nationwide respectfully requests judgment against Ford in the amount of \$23,892.00 plus all other relief that the court finds appropriate.

Respectfully submitted,



Glen H. Garrett (0065468)
ZIEGLER, METZGER & MILLER, LLP
925 Euclid Avenue, Suite 2020
Cleveland, Ohio 44115-1441
(216) 781-5470/Fax (216) 781-0714
Email: ghg@zieglermetzger.com

Attorney for Plaintiff,



K B ENGINEERING

1271 EDGEHILL ROAD
COLUMBUS, OHIO 43212
614 / 299-0803
FAX 614 / 299-0831

April 19, 2002

[REDACTED]
Gahanna, OH [REDACTED]

RE: Your Claim N^o [REDACTED]
KBE Project N^o 02-0402 Vehicle Fire Analysis

Dear [REDACTED]

Pursuant to your request, K B ENGINEERING (KBE) has examined a 2000 Ford Explorer that reportedly was involved in a fire on April 12, 2002 between 12:45 and 1:00 P.M. The information submitted to KBE was that after having used the vehicle that morning for errands, the Explorer was being pulled into the garage. While the vehicle was being moved, smoke was observed along the left side of the hood. The vehicle was moved back, away from the house. By the time the fire department was called and responded, the vehicle was totally engulfed in fire. Specifically, KBE was requested to examine the vehicle and determine the cause and origin of the fire. KBE's study consisted of the following:

1. On April 17, 2002, Mr. Kenneth W. Berchak, P.E., KBE's Mechanical Engineer, examined the vehicle at the owner's residence and location of the vehicle fire, 5101 Goodson Rd. in West Jefferson, OH. Available during the examination was the vehicle driver, [REDACTED]

Based on the above source of information, KBE has determined the following:

The subject vehicle, reference Figures 1, 2, 3, and 4, was a 2000 Ford Explorer 4-door SUV assigned the V.I.N. 1FMDU85PKY [REDACTED] reference Figure 5. Examination of the dashboard, reference Figure 6, revealed that the instrument cluster was burnt sufficiently to prevent the recording of the vehicle mileage.

Examination of the vehicle exterior indicated that at the time of the fire, a wind was directed at the left side of the vehicle, forcing the fire towards the right side of the vehicle. The left side rear door had an area of original paint still visible. The

left front tire was destroyed and the outside of the rim exhibited high heat and smoke. The left rear tire was burnt but with limited heat damage to the exterior of the rim. The right side tires were consumed by the fire. The right front rim was nearly destroyed except for the remains of the center hub and two spokes, reference Figure 7. The right side body panels exhibited a "low" temperature fire pattern consistent with the ambient air flow over the burning vehicle.

Examination of the front of the vehicle revealed the non-metallic grill and front end parts were destroyed during the fire along with the front mounted heat exchanger components, reference Figure 8. Examination of the exterior of the hood revealed an area of intense heating slightly left of center and toward the forward edge, reference Figures 9 and 10. Examination of the engine side of the hood, reference Figure 11, revealed a corresponding fire pattern along with a less intense fire pattern along the center of the left edge of the hood.

Examination of the engine bay, reference Figures 12 and 13, revealed extensive fire damage. Examination of the left front of the engine revealed that the power steering pump and reservoir were in the direct path of the fire, reference Figure 14. As the fire destroyed the power steering hoses and reservoir, the fluid added to the intensity of the fire. Examination of the top of the engine, reference Figure 15, revealed the left side of the air intake housing was missing with evidence of melting of the housing. Directly below the air intake housing remains were the left side fuel injectors for the 5.0 liter V-8 engine. Examination of the injectors and fuel line revealed that the loss of the fuel line seal released gasoline into the fire adding an accelerant agent, reference Figure 16.

The examination of the engine bay was then directed at the electrical system. The vehicle battery, normally located in the left front corner of the engine bay, was located on the ground, reference Figure 17. Examination of the battery cables revealed portions of the cables were stiff in areas, indicating a high current draw that fused the cable wire strands. Examination of the wiring along the right side of the engine bay, reference Figure 18, revealed the wires were continuous and pliable. Examination of the wiring along the left side of the engine bay, reference Figure 19, revealed the main wire harness was continuous and pliable except for two areas. The first area was located directly below the anti-

lock brake unit mounted to the left side inner fender and directly above the left front wheel/suspension assembly, reference Figure 20. The second area was directly below the power brake booster, reference Figure 21. Examining this area closer revealed only a few wires exhibited wire strand fusing and melting.

Returning to the looped wire harness below the anti-lock brake unit, reference Figure 22, closer examination revealed the wires at the bottom of the looped harness were solidly fused with broken wires having beaded ends, consistent with internal shorting of the wiring, reference Figure 23. No evidence was found that indicated the wire harness had been pinched or damaged by an external component.

The examination was then extended to the fuse/relay box located in the left rear of the engine bay, reference Figure 24. Examination of the visible relay contacts did not reveal any evidence of fusing.

Since [REDACTED] was available, she was asked for additional information. When asked about the vehicle mileage she stated that she had the oil changed in January, 2002 at a vehicle mileage of 7526 miles and provided KBE with a copy of the oil change record, reference Figure 25. She then stated that the vehicle is used on a limited basis and estimated that at the time of the fire the vehicle mileage was between 8500 and 9000 miles.

She added that she had noticed when the vehicle was driven from the house to the mail box, a distance of approximately 375 feet, the check engine light would stay "on" for about 2 minutes. She also indicated that the rear window wiper was in-operative. When asked if the vehicle had exhibited any other abnormalities, she responded that other than the two items she did not notice any other problems. She stated that the fire department responded approximately 10 to 15 minutes after they were called.

Analysis of the data revealed the fire originated along the left side of the vehicle engine bay. Examination of the electrical wiring along the left side of the engine bay revealed that the cause of the fire was an internal failure in the wire harness below the anti-lock brake unit. The internal shorting of the wires ignited the harness then the fire spread to adjacent non-metallic parts of the engine bay.

Analysis of [REDACTED] "check" engine light extended operation suggested that the probable cause was a carbon coated oxygen sensor caused by very low speed short distance driving and idling of the vehicle. Once the vehicle was operated for a sufficient time or driven a longer distance, the check engine light would not stay on. With respect to the in-operative rear window wiper, the fire origin was located in the engine bay and not at the rear of the vehicle, which exhibited a fire pattern consistent with the fire spreading.

In summary, based upon the observations and analysis herein, it is the opinion of K B ENGINEERING that the origin of the vehicle fire ~~was located at the center left side of the engine bay. Further, it is the opinion of KBE that the cause of the fire was an internal short of the wire harness looped below the anti-lock brake unit.~~ Insufficient evidence remained to determine the cause of the wire harness shorting.

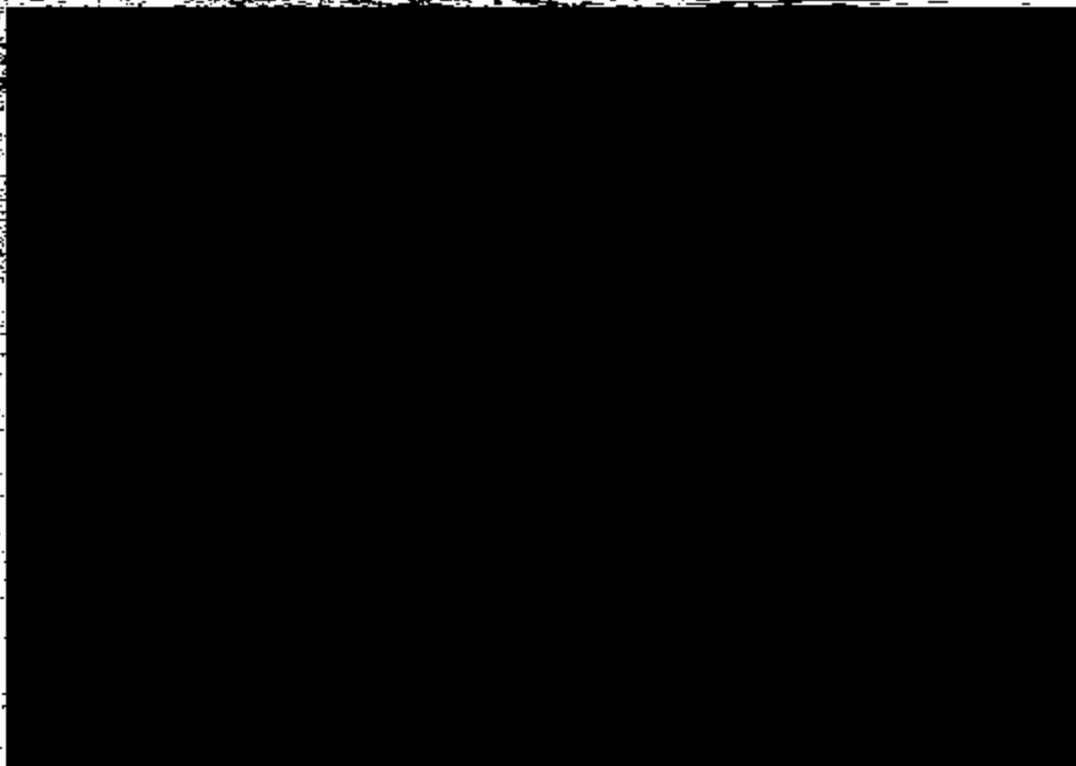
If you have any questions concerning this report or require the additional services of K B ENGINEERING, please contact the report author.

Sincerely,



Kenneth W. Berchak, P.E.
Mechanical Engineer
State of Ohio
Registration N^o E-40676

cc:file 02-0402.wpd



HANNAH, COLVIN & PIPES, L.L.P.

ATTORNEYS AT LAW
2051 SILVERSIDE DRIVE, SUITE 260
BATON ROUGE, LOUISIANA 70808
TELEPHONE: (225) 766-8240
FACSIMILE: (225) 766-5346

RECEIVED JUN 8 2005

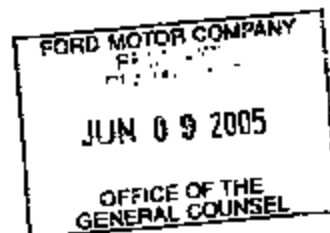
MICHAEL P. COLVIN
W. RANDOM PIPES - i4
JANICE M. REEVES
JULSON O. RANKS
DOREEN M. ABRAHAM
Attorneys at Law

June 7, 2005

HANKS, HANNAH
(1951 - 1993)

Via Fax: (313) 845-4089 and
Certified Mail, Return-Receipt Requested
Ms. Shawn L. Norton
Ford Motor Company
Parklane Tower West, Suite 300
Three Parklane Boulevard
Dearborne, Michigan 48126-2568

Re: State Farm Claim #: 18-A217-457
Insured: [REDACTED]
Location: [REDACTED]
Arcadia, LA [REDACTED]
Date of Loss: May 9, 2005
Our File No.: 821-2184



Dear Ms. Norton:

Please be advised that I have been retained by State Farm Fire & Casualty Company in connection with damages sustained as a result of a fire which occurred on May 9, 2005, at the residence of its insured, [REDACTED], in Arcadia, Louisiana. According to State Farm's investigation, the fire originated in a 1997 Ford F-150, that was parked under the carport of the above mentioned residential dwelling. As a result of the fire, the residential dwelling and the vehicle sustained substantial property damage.

The remains of the vehicle has been removed from the fire scene, and stored at CoPart's in Shreveport, Louisiana. If you wish to schedule an inspection of either the fire scene or the vehicle, please call me upon your immediate receipt of this correspondence, so that we may make the necessary arrangements.

By way of this correspondence, State Farm Fire & Casualty Company is placing Ford Motor Company on immediate notice of this claim as they are seeking full reimbursement of payments made or to be made to or on behalf of its insured [REDACTED]

E005-005-LC-0100

Ms. Shawn L. Norton
May 10, 2005
Page 2

If you have any questions or wish to discuss this matter further, please call.

Very truly yours,



W. Ransom Pipes

WRP/jw

cc: Ms. Kristin Mullins (18-A217-457)

2005-003-LC-0181

State Farm Insurance Companies



JUN 13 2005

June 6, 2005

State Farm Insurance Companies
2077 O'Neal Ln.
Baton Rouge, LA 70816

Toll Free: 877-755-8582

Ford Motor Co.
Parklane Towers West Ste 400
Dearborn, MI 48126-2568

RE: Claim Number: [REDACTED]
Date of Loss: May 9, 2005
Our Insured: [REDACTED]

Dear Sir/Madam:

1997 Ford F150 Pickup. VIN #1FTDX1763V[REDACTED] The identified vehicle is insured by State Farm Mutual Automobile Insurance Company. This vehicle experienced a fire in the engine compartment.

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

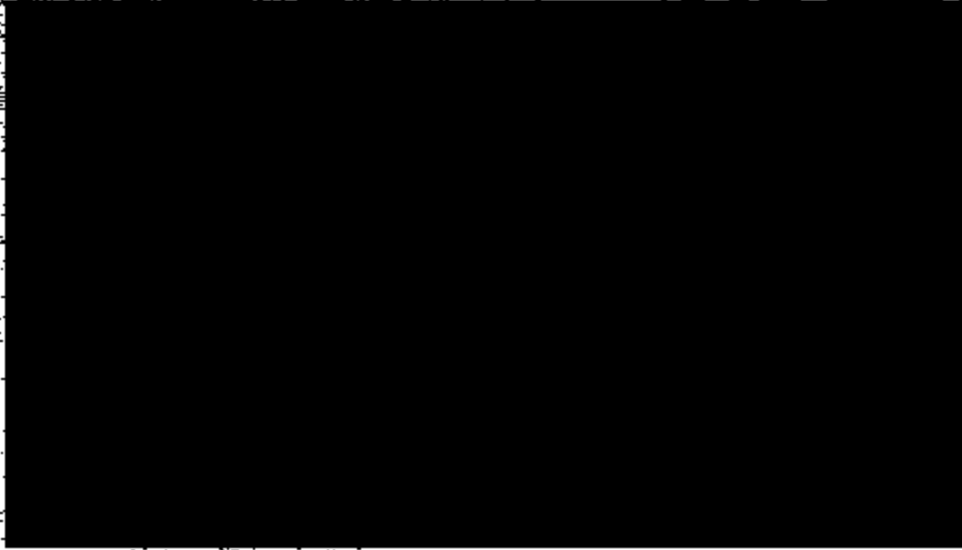
Please contact me at the numbers below to set up a time for your inspection.

Sincerely,

Dawn Droddy
Claim Representative
(225) 755-2959
(866) 804-9024

State Farm Mutual Automobile Insurance Company

ddd



JUN 07 2005

BEGINNING OF CONTACT
06/07/2005

VOICE OF THE CUSTOMER TRACKING SYSTEM

08.00.04

REGION: 47 CINCINNATI	OGC ISSUE	CASE NBR: 0598741575
VIN: 1FTRX18L3WK	ZONE: A3	OPENED: 06/06/2005
	ENGINE: L	CLOSED: 06/06/2005
	VEH TYPE: T	

LAST NAME:		FIRST NAME:		STATUS:	CLOSED
TITLE:				MI:	K
ADDRESS:					
CITY:	BATAVIA	STATE:	OH	ZIP:	
HOME PHONE:					
MODEL YEAR:	1998	MODEL:	F150 4X4 SUPERCAB PICKUP		
MILEAGE:	88000				
DEALER NAME:	32 FORD-MERCURY, IN	SALES CODE:	F47409	P & A:	01922
REASON CODE:	0792 LEGAL - ACCIDENT / FIRE				
SYMPTOMS:	704345 FIRE/SMOKE SCORCHED/BURNT UNDERHOOD				

ORIGIN: CAC38 - US CONCERN CASE BASE COMMUNICATION: PHONE
 ACTION: 705 - CONTACT ADVANCED TO OGC
 DOCUMENT: ANALYST: HPAVLIDE HELEN PAVLIDE

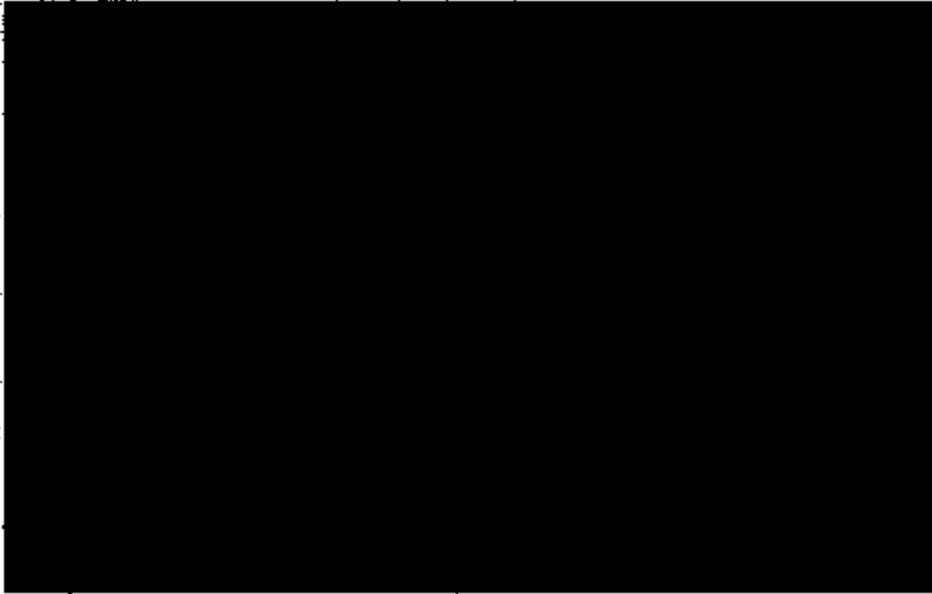
DATE: 06/06/2005 TIME: 16:37:52:
 ACTION DATA/COMMENTS:

CUSTOMER SAID: - WHILE VEH WAS PARKED IN GARAGE AS CUST WAS ON VACATION, VEH BURNED ALSO CAUSING DAMAGES TO GARAGE- FIRE DEPT WAS CALLED, FIRE REPORT WAS FILED- CONTACTED INSURANCE COMPANY, INVESTIGATOR CAME OUT WHO ADVISED CUST FIRE STARTED UNDERHOOD, CUST SHOULD ALSO CALL FORD FOR INVESTIGATION- VEH WAS NOT RECALLED FOR THE CRUISE CONTROL BUT THIS MAY BE RELATED- FEELS PRODUCT DEFECT STARTED FIRE, CAUSED DAMAGE TO VEH AND HOUSE, CAN NOT BRING FAMILY HOME UNTILL THIS IS RESOLVED, CAN NOT GO TO WORK AS DON'T HAVE VEH TO DRIVE, FEELS FMC SHOULD BE RESPONSIBLE FOR DAMAGES-DEALER SAID: - NONE--- 32 FORD MERCURY, INC. 810 WEST MAIN STREET BATAVIA, OH 45103 TEL: (513) 732-2124 CRC ADVISED: I WILL FORWARD THIS INFORMATION TO THE FORD OGC DEPARTMENT. YOU WILL BE CONTACTED WITHIN 3-5 BUSINESS DAYS.--- CUST UNHAPPY WITH RESPONSE, FEELS HE SHOULD NOT HAVE TO WAIT, UNSURE WHERE TO GO WITH FAMILY, WOULD LIKE SOMEONE WHO IS RESPONSIBLE FOR THIS INVESTIGATION TO COME DOWN TO CUST'S HOME AND REVIEW AS UNSURE IF CUST CAN BE CONTACT AT HOME PHONE NUMBER CUST PROVIDED CRC, NOT SURE IF HE WILL BE ABLE TO GO TO WORK WITH OUT A VEH SO WILL NOT PROVIDE WORK #--- ADVISED CUST ALL INFO DOCUMENTED, PROVIDED PHRASEOLOGY

FORD MOTOR COMPANY
 RECEIVED
 CHAIRMAN UNIT

JUN 07 2005

OFFICE OF THE
 GENERAL COUNSEL



GERMAN MUTUAL INSURANCE

P.O. Box 191, Napoleon, Ohio 43545-0191
Telephone: (419) 599-3909 Fax: (419) 592-6938
Toll Free: 1-800-597-0140

June 7, 2005

JUN 07 2005

MICKI LYNN
FORD MOTOR COMPANY
3 PARKLANE BLVD
300 WEST
DEARBORN MI 48126

RE: Our insured
Our claim number
Date of loss

: 06/04/05

Dear Ms. Lynn:

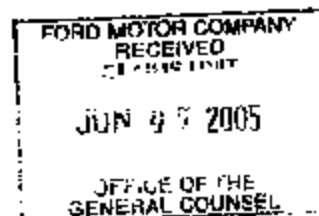
As we discussed on the phone this morning, this letter is to put you on notice of a possible subrogation claim involving our insureds' 1998 Ford E-150 pickup. This vehicle caught fire while parked in the insureds' garage at [REDACTED], Batavia OH [REDACTED].

It is my understanding that you have been in contact with Rick Munn of McAtee, Wesselman & Dennig (800-752-7188) regarding this loss.

Please advise if I can be of further assistance.

Sincerely,

John R. Malkoski
John R. Malkoski
Claims Manager



SENT BY FAX ONLY TO 313-390-2107 ON JUNE 7, 2005

EM05-005-LC-8104



Travelers

Elizabeth Fitzgerald
Claims Representative
Travelers Property Casualty
Fall River, MA
(508) 324-8386
(888) 304-7031 (fax)

Po Box 3022
Fall River Ma 02722

June 3, 2005

Certified Mail

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

Attention: Shawn L. Norton, Claims Analyst/Litigation Assistant

Re: Our file: I [REDACTED]
Our Insured: [REDACTED]
Incident: 5/1/05

Dear Mr. Norton:

We are investigating a claim for our insured, [REDACTED] who sustained a fire loss on 5/1/05. The vehicle ID # is 1FTZX17261 [REDACTED] and the vehicle is a 2001 Ford F-150 XLT 4 DR EXT CAB.

Our investigation reveals that you may be responsible for this loss. The fire was apparently caused by resistive heating in the speed control deactivation switch mounted on the brake master cylinder. The vehicle is currently being held at Copart Auto Auctions, 7277 Otay Mesa Rd., San Diego, CA in lot # 4531895. Their phone number is (619)671-0900.

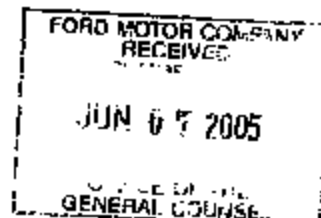
If you would like to inspect the vehicle before the salvage is disposed of, please contact Copart Auto Auctions to make arrangement to view the vehicle prior to 7/5/05.

If you have any questions, do not hesitate to contact me.

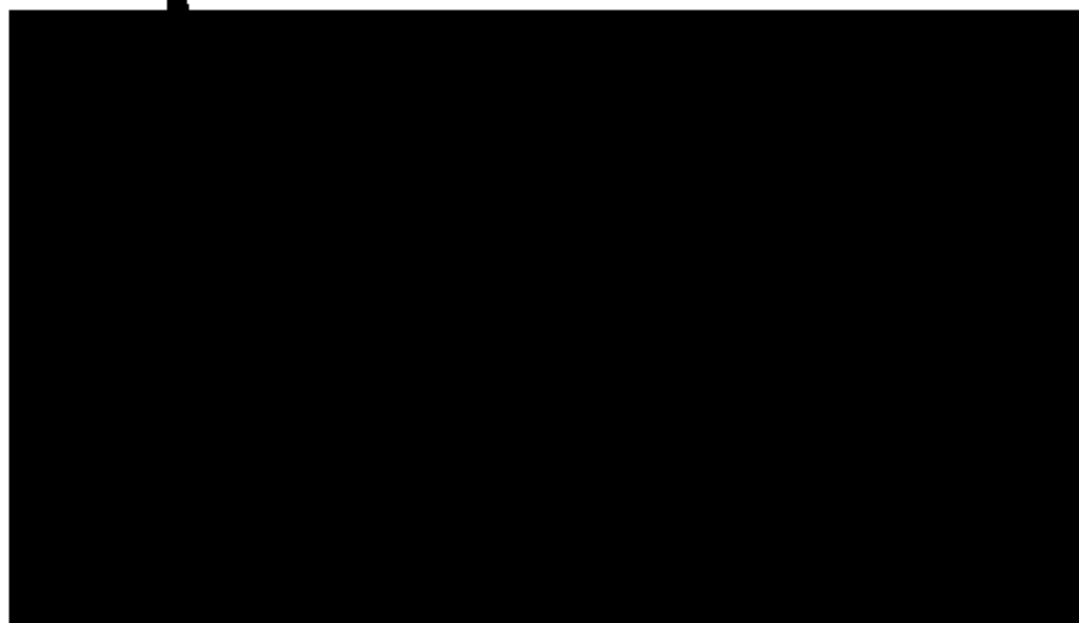
Sincerely,

Elizabeth Fitzgerald
Elizabeth Fitzgerald
Investigator

cc: Copart Auto Auctions



EN05-005-LC-8105





FOR
RECORD

12501

November 28, 2001

The Auto Club Group
1 Auto Club Drive
Dearborn, Michigan 48126-2694

Ford Motor Company
Customer Relations Department
Dearborn MI 48127

RE: OUR INSURED: [REDACTED]
OUR CLAIM NUMBER: [REDACTED]
DATE OF LOSS: 07-30-01
VEHICLE: 2000 Ford Ranger Pick Up
VIN#: 1FTZR15X1Y1 [REDACTED]
TOTAL OWING: \$2351.44

2001 DEC 28 AM 9 26

Dear Sirs:

Our investigation indicates you are legally responsible for the damages resulting from this accident. You have taken possession of the above mentioned vehicle and traded another vehicle with our insured in return. This was a fire caused by product liability. We have paid for a rental vehicle for our insured while we were waiting for your company to agree to liability. We also paid for investigative reports to be done as well.

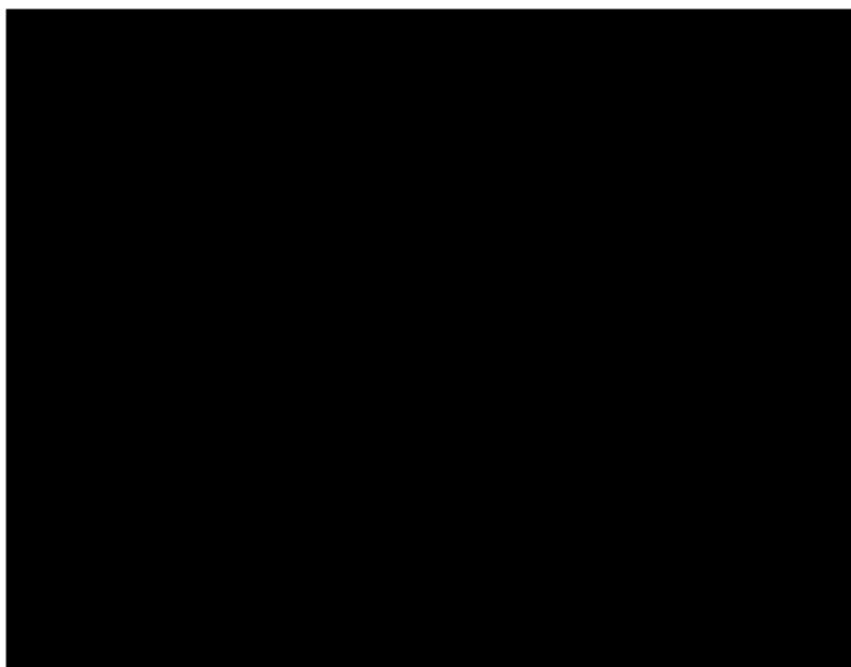
We have paid a total of \$2177.63 as the result of this loss. Our insured paid out \$173.81. We are now looking to you for reimbursement of these damages. Please give this matter your immediate attention and let me hear from you soon at 313-336-2503.

Sincerely,

Nancy Hersey
Claim Representative
Recovery Unit



Called
Tammy
White
1/9/02
sending
file



**GROTEFELD
& DENENBERG, LLC**

Bingham Farms, MI
Chicago, IL
Plantation, FL
San Francisco, CA

The Clark Adams Building
105 West Adams Street
Suite 2300
Chicago, Illinois 60603
Telephone: (312) 551-0200
Facsimile: (312) 601-2402

New (for Shawn)

Brad M. Gordon
Attorney at Law, IL, IN and MN
(312) 601-2377
bm@gd-llc.com

June 8, 2005

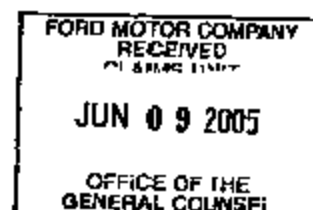
RECEIVED JUN 9 2005

Via Facsimile (312) 390-2407

Sean Norton
Ford Motor Company
Office of the General Counsel
Parklane Towers West, Suite 400
Three Parkland Boulevard
Dearborn, MI 48126-2568

JUN 9 2005

Re: Allstate Insured: [REDACTED]
Claim No.: [REDACTED]
Date of Loss: 5/23/05
Our File No.: 9.008468



Dear Ms. Norton:

Please be advised that this firm represents [REDACTED] with regards to a fire that occurred at the home of its insured [REDACTED] located at [REDACTED] Port Allen, Louisiana. Based upon the results of our investigation and eyewitness statements, the fire originated with a 1998 Ford F150. The insured advised that the speed control deactivation switch would work intermittently and then suddenly stopped working. Additionally, the fire occurred approximately eight hours after the vehicle was last in use. A preliminary opinion as to the cause of the fire may be the malfunction of the speed control deactivation switch. The resulting fire damaged other materials in the garage, communicated to the carport and then to the rest of the Lively home.

The purpose of this letter is to provide you notice of potential exposure for the damages resulting from this loss. We are placing Ford on notice of the loss and that Allstate will subrogate for all damages which it will pay its insured pursuant to its policy in the event that further investigation discloses liability of Ford.

Although this loss is far from being fully adjusted, the initial damages estimate is in the amount of \$125,000. In the event that you are insured for this loss, we suggest you place your carrier on notice immediately. If you are self-insured or are uninsured, we intend to provide access to the site and relevant artifacts pursuant to NFPA 921.

EPO5-005-LC-8107

Ford Motor Company
June 8, 2005
Page 2

Our client wishes to extend an opportunity to Ford to examine the loss site prior to the commencement of repair and renovation. Because of Allstate's obligations to its insured, it is necessary that Ford advise the undersigned before the close of business on Friday, June 10, 2005, of its intent to send a representative to the site to view it in its post-fire condition. If we do not hear from you by that time, we will assume that Ford and/or its representatives do not wish to view the fire scene and that they waive their opportunity to do so.

Once Allstate begins the renovations, the post loss site will then no longer be available to you for inspection. Thank you for your time and understanding in this matter. We look forward to your prompt response to points raised above.

Very truly yours,

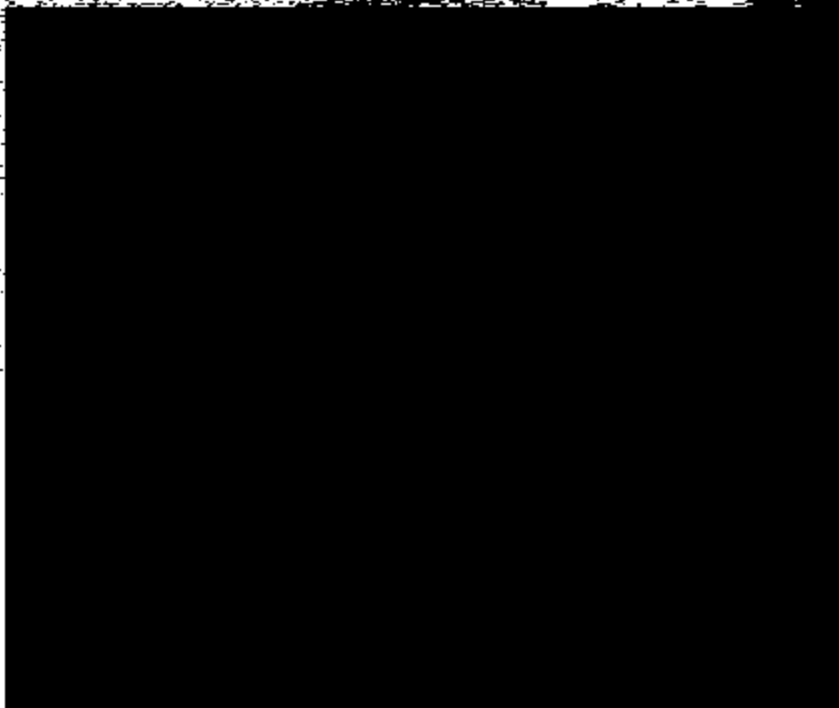
GROTEFELD & DENENBERG, LLC



Brad M. Gordon

BMG/mlm

EQ05-005-LC-8106





Nationwide[®] On Your Side[™]

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

June 15, 2005

Ford Motor Company
Office of General Counsel
Park Lane Tower W, Suite 300
3 Park Lane Blvd.
Dearborn, MI 48126

Attn: Shawn Norton

Re: 7 claims relating to cruise control recall

Dear Ms. Norton:

Enclosed you will find supporting materials regarding 7 additional claims relating to the cruise control recall. We have provided supporting documents for each claim which are separated by a green cover sheet. 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 mabbett@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



NEW
-01 Ranger
- Long, Keith
- Doc - 9/12/04



EROS-888-LC-8118



E985-085-LC-8111

PRODUCED BY FORD



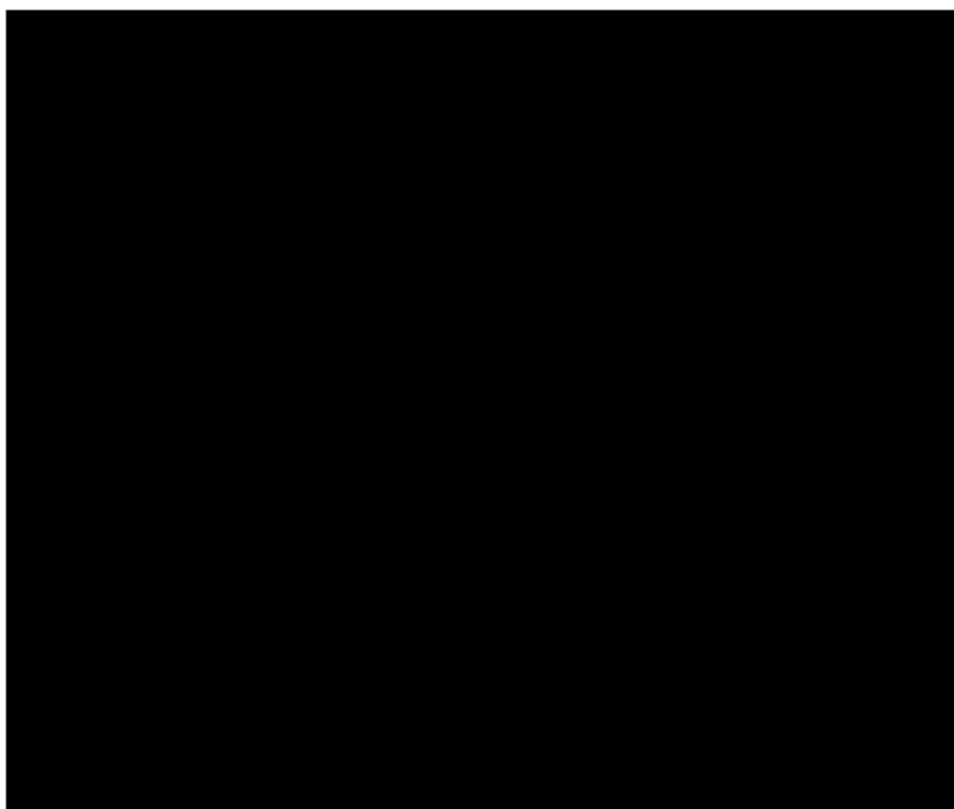
EN05-005-LC-8112

PRODUCED BY FORD



EROS-005-LC-8113

PRODUCED BY FORD





FARMERS

Photo Mounting Sheet

Company Claim No. [REDACTED]

Policy No. [REDACTED]

Insured: [REDACTED]

Claimant: [REDACTED]



Picture # 1

Film: Polaroid _____

Negative _____

Date Taken: 11-30-99

Time: _____

By: _____

Location and View: _____

LT. REAR



Picture # 2

Film: Polaroid _____

Negative _____

Date Taken: 11-30-99

Time: _____

By: _____

Location and View: _____

RT REAR



FARMERS

Photo Mounting Sheet

Company Claim No. [REDACTED]

Policy No. [REDACTED]

Insured: [REDACTED]

Claimant: [REDACTED]



Picture # 3

Film: Polaroid _____

Negative _____

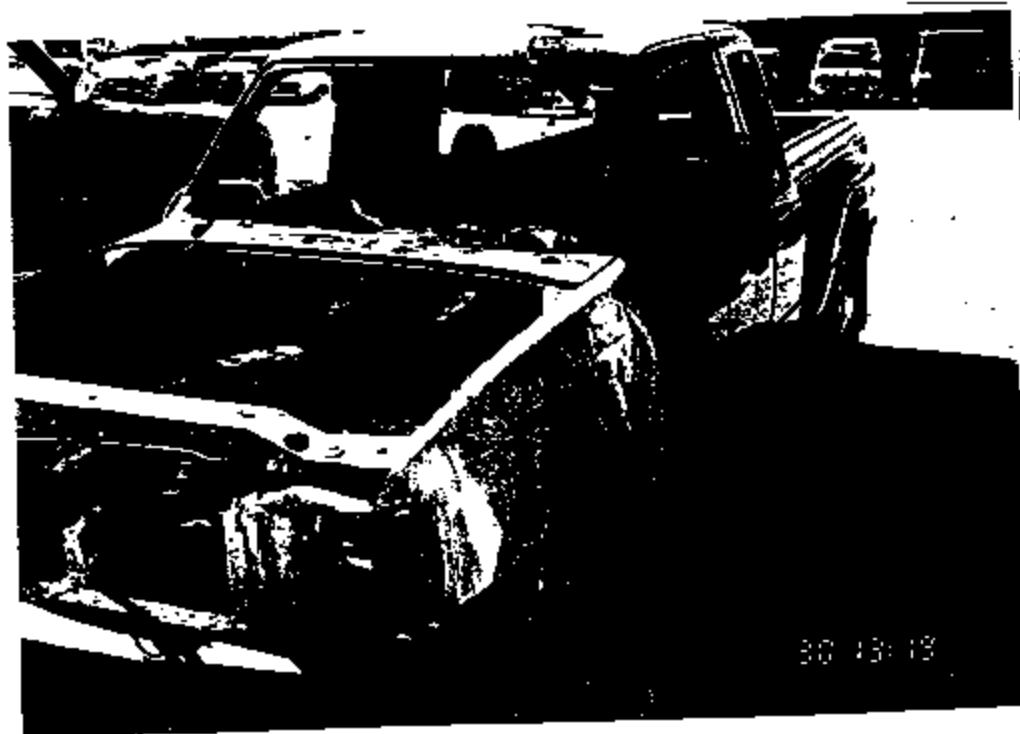
Date Taken: 11-30-99

Time: _____

By: _____

Location and View: _____

RT. Ft.



Picture # 4

Film: Polaroid _____

Negative _____

Date Taken: 11-30-99

Time: _____

By: _____

Location and View: _____

LT. Ft.

EA05-005-LC-0115



FARMERS

Photo Mounting Sheet

Company Claim No. [REDACTED]

Policy No. [REDACTED]

Insured: [REDACTED]

Claimant: [REDACTED]



Picture # 5

Film: Polaroid _____

Negative _____

Date Taken: 11-30-59

Time: _____

By: _____

Location and View: _____

FRONT



Picture # 6

Film: Polaroid _____

Negative _____

Date Taken: _____

Time: 11-30-59

By: _____

Location and View: _____

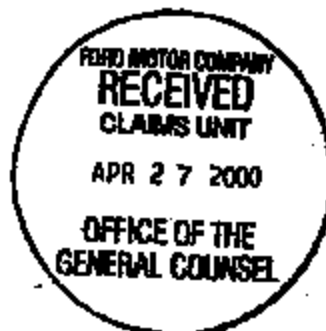
FT. AND MIDRACK
LEFT SIDE



FARMERS

DFW SPECIALTY CLAIMS OFFICE
4100 EMBARCADERO DR - 2ND FLOOR
P.O. BOX 150888
ARLINGTON, TX 76015
(817) 487-8882
FAX (817) 487-8810

April 21st, 2000
Ford Motor Company
Three Parkland Blvd. #300
Dearborn, MI 48126



RE: Our Insured : [REDACTED]
Loss Date : 11/26/1999
Our Policy# : [REDACTED]
Claim # : [REDACTED]
Your Insured: Ford Motor Co.
Address: : Three Parkland Blvd. #300
: Dearborn, MI 48126
Your File # :
Total Claim : \$15,674.37

Our investigation has established that the above loss was caused by the negligence of your insured. If you have already made a settlement with our insured, please advise us immediately.

[] We have made payment to our insured for the damage. By virtue of our subrogation rights, this is to advise you that we shall seek reimbursement from you for the amount of the damage.

[] We have a medical payment subrogation interest on any payments you may make to settle injury claims, arising out of this accident. Please acknowledge our rights and protect us on any payments you make.

[] Our insured's vehicle was rendered a total loss. We will forward support for disposition of salvage when sold.

Please be advised that if you are contacted by an attorney representing our insured, they do not represent our interest. We will expect a separate payment for our damages unless we notify you otherwise.

Your prompt consideration of our claim will be appreciated.

Sincerely
Teresa Farmers Insurance Company
Melanie Bedford
Mel Bedford/Paula Brewer
Subrogation Analyst

ER85-005-LC-0117

Photo #1

**Front exterior view,
showing burn
damage progressing
from engine
compartment,
passenger side.**



Photo #2

**Front driver side
view, showing burn
damage progressing
from engine
compartment, more
severely along
passenger portions.**



AE

99262V

Photo #3

*Vehicle identification
number, driver dash.*



Photo #4

*Driver side view,
showing burn
damage progressing
from engine
compartment.*



AE
992637

Photo #5

**Rear driver side
view, showing burn
damage progressing
from engine
compartment.**



Photo #6

**Rear exterior view,
showing burn
damage progressing
from engine
compartment.**



997021

Photo #7

Pick-up bed, showing
debris from roadside
with no suspect burn
damage progressing
from any items
observed.

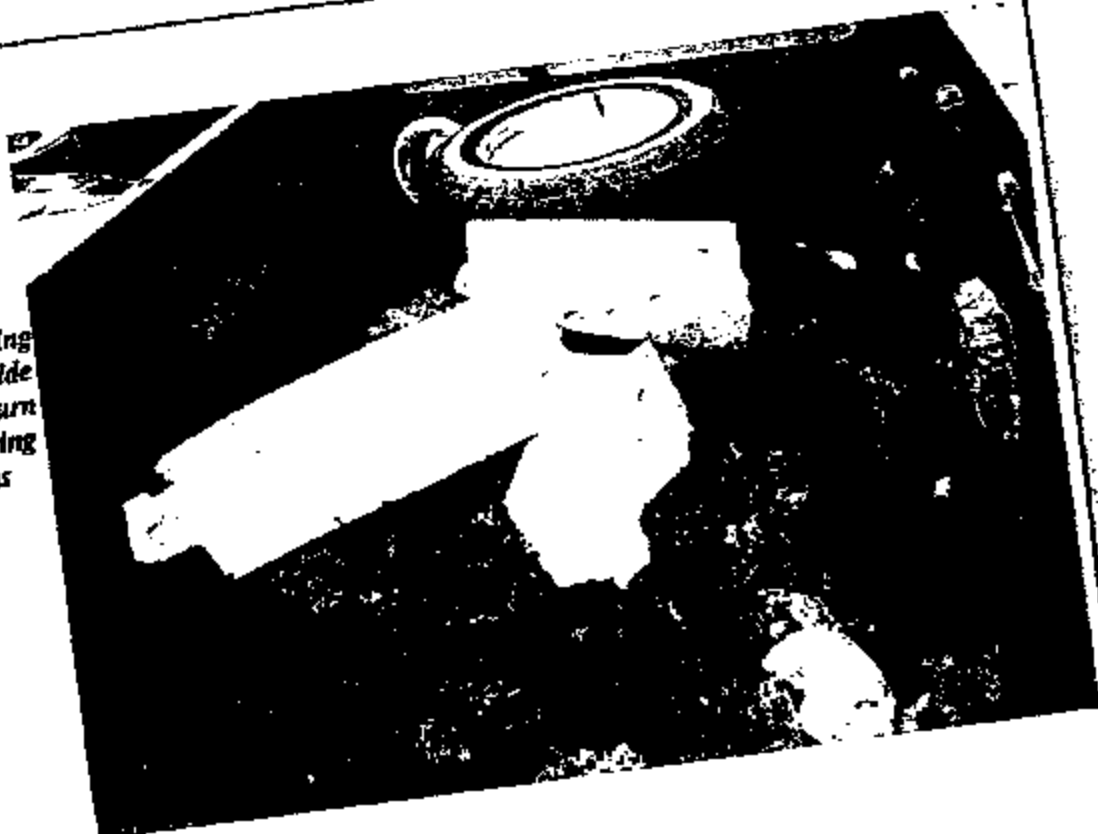


Photo #8

Rear passenger side
view, showing burn
damage progressing
from engine
compartment.



Photo #9

*Passenger side view,
showing burn
damage progressing
from engine
compartment.*



Photo #10

*Front passenger side
view, showing burn
damage progressing
from engine
compartment with
more severe burn
damage progressing
outward from
passenger portion.*



Photo #11

**Passenger seat area,
showing large
amount of
combustible
materials within
lower areas and seat
melted downward,
indicating fire
progressed upward
along roofline and/or
windshield.**



Photo #12

**Driver seat area,
showing less amount
of burn damage than
passenger seat with
burn damage
progressing inward
at windshield and/or
cowl area.**



9924317

Photo #13

Front view of engine compartment, arrow showing most severe burn damage and/or heat stress progressing upward and outward from area where alternator had been positioned with no alternator remaining, most probably lost during transport.

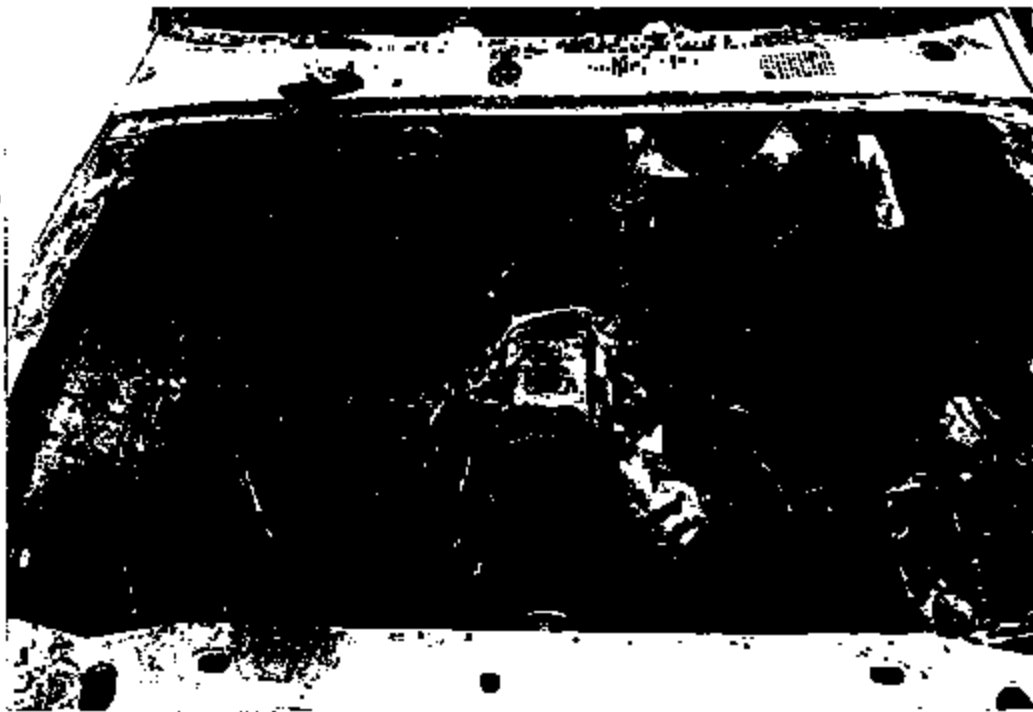
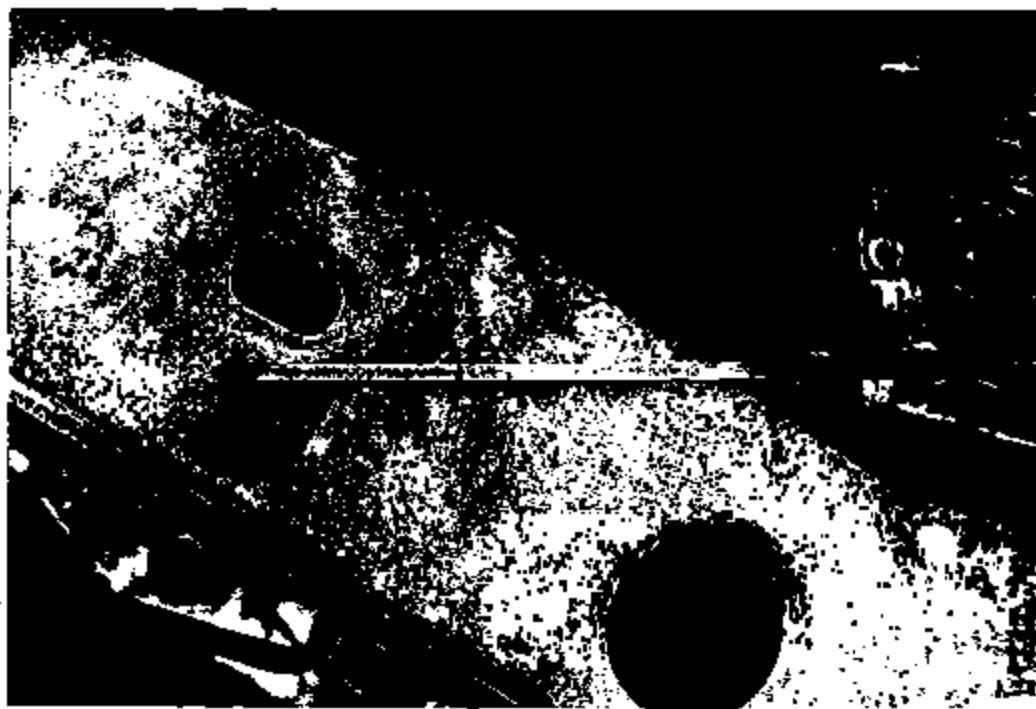


Photo #14

Engine oil dipstick, showing no oil level.



91161V

Photo #15

*Passenger side view,
engine compartment,
arrow showing most
severe burn damage
and/or heat stress
progressing upward
and outward from
area where
alternator had been
positioned.*



Photo #16

*Battery, driver front
portion, showing no
suspect burn
damage, arcing
and/or shorting.*



A-
DE
4-17

991617

Photo #17

Driver side view of engine compartment, showing less amount of burn damage on driver side of engine than passenger side with arrow showing most severe burn damage and/or heat stress progressing upward and outward from center passenger portion engine and/or compartments.



932627



H. W. "Hank" Bardenhagen

Houston (713) 973-3714

Conroe (409) 295-0522

Date of Report: December 8, 1999
Case Number: 99262V
Date of Loss: November 26, 1999
Time of Loss: 12:30 A.M.

Prepared for: FARMERS INSURANCE GROUP
Requested by: Dave Shorter/Joel Brunner
Assured: [REDACTED]

Houston, Texas

Claim Number: [REDACTED]

REPORT SUMMARY

This report summary is for the convenience of the requestor. The summary is not attached and/or considered part of the original examination report but may be used as required by the requestor.

The above listed loss was caused by flames ignited within the engine compartment, passenger center portion.

Based on the observations of the fire scene on the date of this examination, this investigator concludes the cause of the above captioned loss should be regarded as most probably accidental.

If any significant and/or suspect residue is found within any samples collected, the above listed conclusion may be reconsidered. A supplemental report containing any changes will be submitted at a later date.

Please feel free to contact my office at your convenience should you require additional information or assistance.



FARMERS

Photo Mounting Sheet

Company Claim No. [REDACTED]

Policy No. [REDACTED]

Insured: [REDACTED]

Claimant: [REDACTED]



Picture # 1

Film: Polaroid _____

Negative _____

Date Taken: 11-20-99

Time: _____

By: _____

Location and View: _____

LT. REAR



Picture # 2

Film: Polaroid _____

Negative _____

Date Taken: 11-20-99

Time: _____

By: _____

Location and View: _____

RT REAR



FARMERS

Photo Mounting Sheet

Company Claim No. [REDACTED]

Policy No. [REDACTED]

Insured: [REDACTED]

Claimant: [REDACTED]



Picture = 3

Film: Polaroid _____

Negative _____

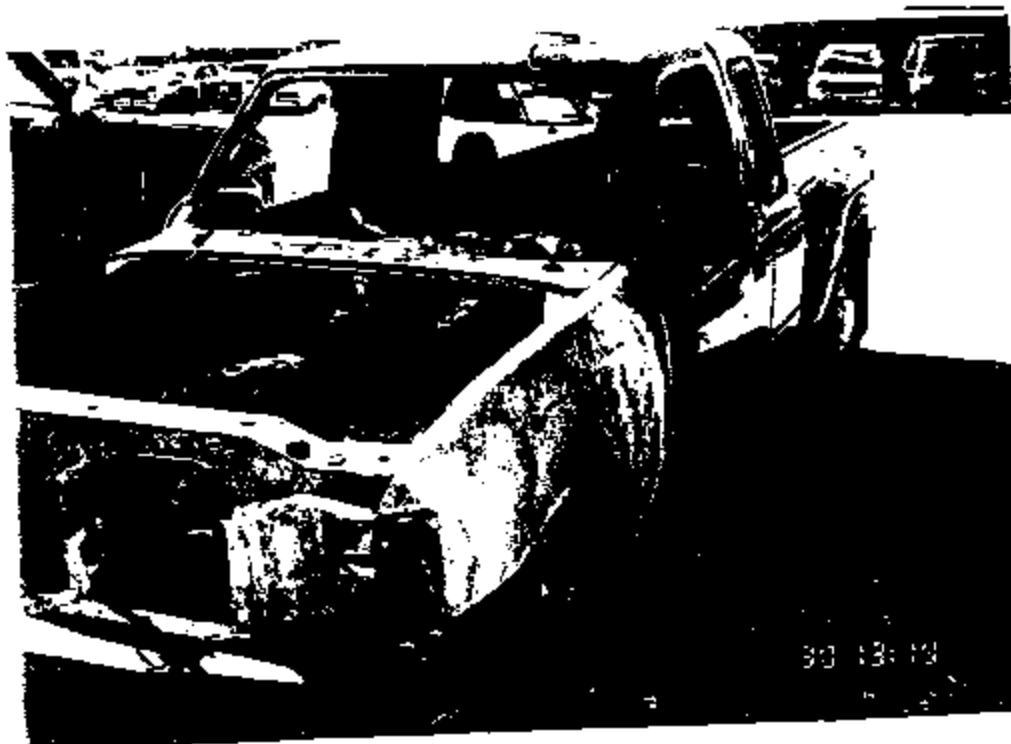
Date Taken: 11-30-77

Time: _____

By: _____

Location and View: _____

RT. Ft.



Picture = 4

Film: Polaroid _____

Negative _____

Date Taken: 11-30-77

Time: _____

By: _____

Location and View: _____

LT. Ft.



FARMERS

Photo Mounting Sheet

Company Claim No. _____

Policy No. _____

Insured: _____

Claimant: _____



Picture # 5

Film: Polaroid _____

Negative _____

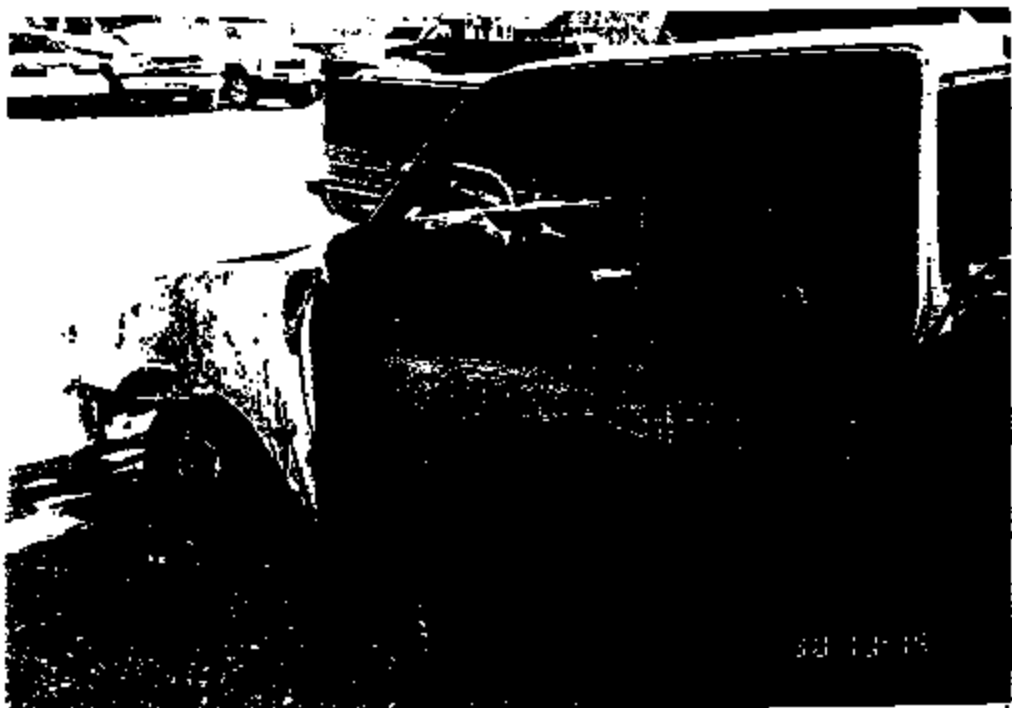
Date Taken: 11-30-94

Time: _____

By: _____

Location and View:

FRONT



Picture # 6

Film: Polaroid _____

Negative _____

Date Taken: _____

Time: 11-30-94

By: _____

Location and View:

FT. AND REAR
LEFT SIDE