

GB412 POID	TX State	1/26/2004 Incident Date	3 Station	148 Incident Number	0 Exposure	NPIS-1 Basic
---------------	-------------	----------------------------	--------------	------------------------	---------------	-----------------

Location <input type="checkbox"/> Address is on the Wildland Fire Module		Census Tract 070323	
Street Address		OR	
Number/Zip	Prefix Street or Highway	Street Type	Suffix
Mendocino Place		TX	
Apt./Suite/Room	City	State	Zip Code
Cross street or directions			

Incident Type 131 Passenger vehicle fire	Date & Time Alarm: 1/26/2004 00:45:00	Shifts & Alarms 0 1 4
Aid Given or Received None	Arrival: 1/26/2004 00:48:00	Shift Alarm Out
Their FID State	Controlled: 00:00:00	Special Studies
Their Incident Number	Lost Unit: 1/26/2004 01:18:00	

Action Taken 11 Extinguish Primary Action Taken (1) Additional Action Taken (2) Additional Action Taken (3)	Resources <input checked="" type="checkbox"/> Apparatus or Personnel Form Used Suppression: 0 MISC: 0 Other: 0 <input type="checkbox"/> Resource counts include aid received
Estimated Dollar Losses & Values LOSSES Property: 0 <input checked="" type="checkbox"/> None Contents: 0 <input checked="" type="checkbox"/> PRE-INCIDENT VALUE: Property: 0 <input checked="" type="checkbox"/> Contents: 0 <input checked="" type="checkbox"/>	

Disposition <input checked="" type="checkbox"/> None	Deaths Injuries	Hazardous Materials Released
Fire Service: 0	0	N None
Chiller: 0	0	
Detector	Mixed Use Property	

Property Use 882 Residential street, road or residential driveway
--

104837441

GB412 TX	1/28/2004	3	149	0	MPRS - 2
FD03	State	Incident Date	Station	Incident Number	Exposure
					Fire

Equipment Involved in Ignition <input checked="" type="checkbox"/> None NRCN 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 damaged <input type="checkbox"/> Involved in ignition, but did not burn <input checked="" type="checkbox"/> Involved in ignition and burn F-150 Crew Cab Mobile property model FPV-L20 License Plate Number State Year 2003 12345678901234567890 VIN Number	Mobile Property Type & Make 11 Passenger car. Mobile property type FO Ford Mobile property make
---	--

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

GS412 TX PID State	1/26/2004 Incident Date	3 Station	149 Incident Number	0 Exposures	NFIRS - 2 File
-----------------------	----------------------------	--------------	------------------------	----------------	-------------------

Property Details

0

Est. number of residential units

0

Number of buildings involved

☒ Not Residential

0.000

Acres burned

☒ None

Less than one acre

☒ Buildings not involvedOn-Site Materials
or Products☒ None

On-site material (1)

Storage use (1)

On-site material (2)

Storage use (2)

On-site material (3)

Storage use (3)

Ignition

E3 Engine area, running gear, wheel area

Area of origin

UU Undetermined

Heat Source

UU Undetermined

Item first ignited ☐ Confined to object of origin

UU Undetermined

Type of material first ignited

Cause Of Ignition

☐ Exposure Report3 Failure of equipment or heat source
Causes

Factors Contributing To Ignition

☒ None

NN None

Factor contributing to ignition (1)

Factor contributing to ignition (2)

Human Factors Contributing To Ignition

☒ None☐ Age was a factor☐ Asleep☐ Possibly impaired by alcohol or drugs☐ Unattended person☐ Possibly mentally disabled☐ Physically disabled☐ Multiple persons involved

Estimated age of person involved

Sex of person involved

Person/Entity involved				Business name		Phone Number	
Mr., Ms., Mrs.	First Name	SW	Last Name			Suffix	
[REDACTED]						OR	
Number	Prefix	Street or Highway				Street Type	Suffix
Post Office Box	Apt./Suite/Room		Meadows Place				
TX	[REDACTED]		City				
State	Zip Code						

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

Authorization			
Officer in charge:	Di Camillo, Lawrence, R	Signature:	
	Assignment	Date	1/27/2004
			Asst Chief/EMT Lawrence R. Di Camillo
Member making report:	Di Camillo, Lawrence, R	Signature:	
	Assignment	Date	1/27/2004
			Asst Chief/EMT Lawrence R. Di Camillo

08412 (00)	TX State	1/28/2004 Incident Date	3 Station	148 Incident Number	0 Exposure	0 Fetch - 1 Notes
Notes						
Title: Incident Notes						

Pick-up truck on fire in driveway of residence. Fire extinguished and SFM #3 requested for the investigation. SFM #3 unavailable and fire believed to be electrical in nature. MPPD units on scene and vehicle left with Owner (Nelson) and MPPD.

FDA

Failure & Damage Analysis, Inc.

February 9, 2004

Mr. Chuck Persinger
Horace Mann Insurance
13111 Northwest Freeway, Suite 400
Houston, Texas 77040

Re: Claim No. [REDACTED]
Insured: [REDACTED]
Subject: Report of Findings
File: 667

Dear Mr. Persinger:

On January 25, 2004, a car fire accident happened at the residence of [REDACTED] on 1338 Scarcelo Lane in Stafford, Texas. A 2001 Ford F-150 suddenly caught fire while parked in the driveway of [REDACTED] residence. The owner of the vehicle reportedly heard an explosion sound coming from his vehicle. They reportedly called the fire department and the fire department put out the fire.

Failure & Damage Analysis Inc. was retained to examine the vehicle and determine the cause and origin of the fire.

In the course of our work, we examined and photographed the Ford F-150.

Conclusions & Discussion

- 1- The fire damage is consistent with the reported fire accident.
- 2- There has been over 10 similar fire accidents on the 2000 Ford F-150 trucks which have the same similar design as 2001 Ford F-150s.

3- The fire started in front of the master cylinder on the driver side underneath the air filter. The cause of the fire is electrical. According to some of the reports it is caused by a faulty brake pressure switch, which mounts on the front of the master cylinder. It has been reported that although the switch blows a fuse, somehow the switch keeps burning and melting, unless the battery is disconnected. The air filter above the switch starts getting hot and starts expanding like a plastic ball till the fire reaches it and blow the plastic ball. The expanded air filter blows like a ball as it releases the trapped air making an explosive sound.

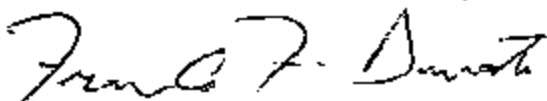
4- A copy of similar fire incidents for Ford F-150 has been attached..

Our report is based on the information made available to us at this time. Should additional information become available, we reserve the right to determine the impact, if any, of the new information on our opinions and conclusions, and to revise our opinions and conclusions if necessary and warranted by the discovery of additional information.

Thank you for allowing us to provide this service. If you have any questions or need additional assistance, please contact us.

Sincerely,

FAILURE & DAMAGE ANALYSIS, INC.



Franco F. Davati, P.E.
Consultant, M.S.; A.E.; DABFE
Diplomate, American Board of Forensic Examiners

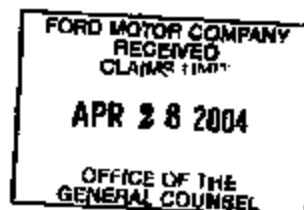


Horace Mann
Educated Financial Solutions

Retirement Annuities and Life, Auto,
Homeowners and Group Insurance

April 20, 2004

Ford Motor Company
Office of General Counsel
Parklane Towers West, Ste 300
Dearborn, MI 48126-2568



Attn: Claims Analyst

NOTICE OF LIEN AND SUBROGATION INTEREST

Subject: Date of Loss: 1/25/04
 Our Claim: [REDACTED]
 Our Insured: [REDACTED]
 Amount of Claim: \$18,301.56

Dear Sir or Madam:

Our investigation establishes that the fire which caused the total loss of our insured's 2001 F150 truck, VIN #1FTRW07W31K [REDACTED] was caused by a faulty brake pressure switch, which is mounted on the front of the master cylinder.

Please accept this letter as notice of subrogation rights and communicate with us promptly. Please refer to our claim number on all communications.

Sincerely,

Peggy Carnille
General Adjuster
Subrogation Unit
Horace Mann Insurance Companies

Enc: Supports

WSP 5/8/00
ESP 10/10/00

- Meadow Place, TX

- 1/25/04
- \$18,301.56
- '01 F-150
- VIN
- parked for 1 hr
- 103,000 (M)



Horace Mann
Educated Financial Solutions

Retirement, Annuities, Life, Auto,
Homeowners and Group Insurance



The Horace Mann Companies 1 Horace Mann Plaza Springfield, Illinois 62715-0001

http://images.copart.com/website/data/pix/20040120/00651554_4X3PG

4/20/2004

EP05-005-LC-0056



Horace Mann

Education Financial Solutions

Retirement Annuities and Life, Auto,
Homeowners and Group Insurance

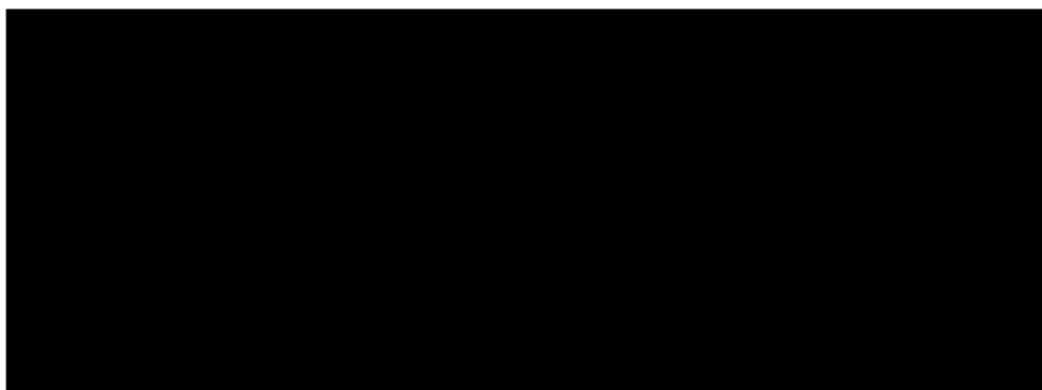


The Horace Mann Companies 1 Horace Mann Plaza Springfield, Illinois 62715-0001

http://images.copart.com/website/data/pic/20040120/00857334_TX3PG

4/20/2004

ER05-005-LC-0030





CONSUMER AFFAIRS
SECTION

Office of the General Counsel

PRIVILEGED & CONFIDENTIAL

Ford Motor Company
Parklane Towers West
Suite 300
Three Parklane Boulevard
Dearborn, Michigan 48128-2588

5 MAR -3 PM 2:20

January 11, 2005

Beacon Insurance Group
PO BOX 97523
Wichita Falls, TX 76307
ATTENTION: ABBY MEADOR

Re: Claimant: [REDACTED]
D/O/E: 10-24-2004
Your Claim #: [REDACTED]

MAR 03 2005

Dear Ms. Meador:

We acknowledge your recently submitted subrogation claim. In order to assist us in evaluating your claim, we request that you provide us with the following information: (Please note that the information requested is in regard to the Ford manufactured vehicle.)

- ☒ 1. Attach statement with a complete description of the incident, including events that occurred prior to and subsequent to the loss.
- ☒ 2. A copy of the police and/or fire report.
- ☒ 3. Original color photographs of the vehicle's collision/fire damage & the alleged defective parts, from several different angles.
- ☐ 4. Original color photographs of the inside of the vehicle showing the steering wheel, dash and roof areas.
- ☐ 5. Original color photographs of the accident / fire scene from several different angles.
- ☒ 6. Attach a copy of your expert's report and the expert's original photographs.
- ☐ 7. Attach the repair estimate, repair order, or your total loss worksheet for the vehicle's damage and any losses associated with this incident, and copies of draft payments.
- ☒ 8. Attach the complete service history for the subject vehicle, including any tune-ups or oil changes. - See attached statement.

NONE

Please answer the following in the space provided. If you need additional space, please use the back of the form:

- 9. What was the city and state of occurrence: Mt. Pleasant, TX
- 10. The 17 digit vehicle identification number: NA
- 11. What was the mileage at time of occurrence: NA
- 12. What is the alleged defect: NA
- 13. Has the alleged defective part been repaired or replaced? (circle one) Yes or No

14. What is the current location of the vehicle, and the alleged defective part(s)?
Wester Auto Salvage in Big Spring, Texas 1-800-548-1444
15. List all after market additions or modifications that were made to the vehicle:
None
16. Was the engine running? (circle one) Yes or No
17. Were the keys in the ignition? (circle one) Yes or No
18. Was this vehicle purchased new or used: Used
If purchased used, provide the date of purchase, mileage at the time of purchase, and from whom
the vehicle was purchased: May 2002, 20,000 miles, Cypress Ford

Once we are in receipt of the requested information, it will be reviewed and you will be notified of our decision concerning your claim. Should you not send all of the requested information and materials, we will assume that you are not interested in pursuing a claim and we will close our file. Please note that your vehicle will not be inspected until all the above information has been submitted and a determination has been made as to whether an inspection is warranted.

Please be advised that all necessary steps should be taken to ensure that the subject vehicle and all of its component parts are maintained and preserved for trial. Ford Motor Company has the right to inspect the vehicle and remove and test any component part that you claim to be defective, and to be presented with the vehicle and the subject component part(s) at the time of trial, should litigation ensue from this informal claim.

Please Note: If you propose to repair the vehicle for continued usage, such repairs may not be performed until after Ford Motor Company has inspected the vehicle and removed and tested any component part you claim to be defective or advised you in writing that it does not intend to perform such inspection and/or testing at this time. But even in that event, Ford Motor Company will insist that all components claimed to be defective are maintained and preserved for trial.

Sincerely,


Shawn L. Norton
Claims Analyst /
Litigation Assistant

OCT-26-2004 10:05

JONES INSURANCE

903 576 1636

P.03

State: * Incident: * Station: * Incident Number: * Report: *

Check the activity

Fire

Property Details

- B1 ☐ Not Residential
Estimated Number of residential living units in building of origin whether or not all units became involved
- B2 ☐ Buildings not involved
Number of buildings involved
- B3 ☐ Acres burned (outside lines) ☐ Less than one acre

C On-Site Materials or Products

Enter up to three codes. Check one or more boxes for each code entered.

On-site material (1)

On-site material (2)

On-site material (3)

Complete if there were any significant amounts of commercial, industrial, heavy or agricultural products or materials on the property, whether or not they became involved

- 1 ☐ Bulk storage or warehousing
2 ☐ Processing or manufacturing
3 ☐ Packaged goods for sale
4 ☐ Repair or service
- 1 ☐ Bulk storage or warehousing
2 ☐ Processing or manufacturing
3 ☐ Packaged goods for sale
4 ☐ Repair or service
- 1 ☐ Bulk storage or warehousing
2 ☐ Processing or manufacturing
3 ☐ Packaged goods for sale
4 ☐ Repair or service

D Ignition

D1 ☒ Engine area, running
Area of fire originD2 ☒ Undetermined
Heat sourceD3 ☒ Undetermined
Time first ignited: 1 ☐ Less than 15 minutes
2 ☐ 15 minutes to 1 hour
3 ☐ More than 1 hourD4 ☐ Undetermined
Type of material first ignited

Cause of Ignition

Check one if this is an exposure report. Skip to section E

- 1 ☐ Intentional
2 ☐ Unintentional
3 ☐ Failure of equipment or heat source
4 ☐ Hot of surface
5 ☐ Cause under investigation
6 ☐ Cause undetermined after investigation

E2 Factors Contributing To Ignition

- Factor Contributing To Ignition (1)
- Factor Contributing To Ignition (2)

E3 Human Factors

Contributing to Ignition

Check all applicable boxes

- 1 ☐ Asleep ☐ Drunk
2 ☐ Possibly impaired by alcohol or drugs
3 ☐ Unattended person
4 ☐ Possibly mental disabled
5 ☐ Physically disabled
6 ☐ Multiple persons involved
- 7 ☐ Age was a factor
Estimated age of person involved
- 1 ☐ Male 2 ☐ Female

F1 Equipment Involved In Ignition

Check one if equipment was not involved, skip to section E

Equipment involved

Brand

Model

Serial #

Type

F2 Equipment Power

Equipment power source

Equipment portability

1 ☐ Portable
2 ☐ Stationary

Portable equipment normally can be moved by one person, is designed to be used in multiple locations, and requires no tools to install.

G Fire Suppression Factors

Enter up to three codes. Check one

Fire suppression factor (1)

Fire suppression factor (2)

Fire suppression factor (3)

H1 Mobile Property Involved

- ☐ None
- 1 ☐ Not involved in ignition, but burned
2 ☐ Involved in ignition, but did not burn
3 ☒ Involved in ignition and burned

H2 Mobile Property Type & Make

H1 ☒ Passenger car
Mobile property type

H2 ☐ Ford
Mobile property make

Local Use

- ☐ Fire-Resistant Available
One of the information presented in this report may be used upon request from other agencies
- ☐ Arrest report attached
☐ Police report attached
☐ Criminal report attached
☐ Other reports attached

F-150 PICKUP

Mobile property model

2000

Year

SYF-741

Mobile state number

TX

State

1578070615

VIN Number

NFIRS-2 Revision 01/19/99

RECEIVED

OCT 26 2004

BIG/CLAIMS

TOTAL P.03

EP05-005-LC-0062

NY, FIRE/RENT FIRE DEPT

Location#

- ☒ Street address
☐ Intersection
☐ In front of
☐ Rear of
☐ Adjacent to
☐ Directional

Check this box to indicate that the address for this incident is provided on the Wildland Fire Maps in Section 2 "Alternative Location Specifications". See only for Wildland Fires. ☐ **Chamber Street 8688 - 88**

Map/Zip/Port Facility Street or Highway **MT. PLEASANT** ☒ **TX** **75455** **88**

City State Zip Code

Cross street or direction, as applicable

C Incident Type #

131 Passenger vehicle fire

Deviant Type

D Aid Given or Received#

- 1 ☐ Mutual aid received
 2 ☐ Automatic aid serv.
 3 ☐ Mutual aid given
 4 ☐ Automatic aid given
 5 ☐ Other aid given
 W ☒ None

Their POCO Their STOPS
 Their Incident Number

E1 Date & Time#

Check boxes if dates are from ALARM always required
 Date. Alarm # **10** **24** **2004** **14:09:04**
 Arrival # **10** **24** **2004** **14:13:47**
 Controlled **10** **24** **2004** **14:16:30**
 Lost Unit **10** **24** **2004** **14:44:02**
 Closed **10** **24** **2004** **14:44:02**

E2 Shift & Alarm#

Local option
☒ **01** **p**
 Shift or Alarm District
 Station

E3 Special Studies

Local Option
 Special Study ID# Special Study Value

F Actions Taken#

- 11** Extinguish
 Primary Action Value (1)
80 Information,
 Additional Action Value (2)
 Additional Action Value (3)

G1 Resources#

Check this box and skip this section if an apparatus or personnel form is used.
 Apparatus Personnel
 Suppression **0001** **0004**
 BOS **0001** **0004**
 Other **0001** **0004**
☐ Check box if resources include aid received resources.

G2 Estimated Dollar Losses & Values

LOSSES: Required for all fires if above, optional for non fires.
 Property \$ **000** **000** **000** ☒
 Contents \$ **000** **000** **000** ☒
 Non-incident Value: Optional
 Property \$ **000** **000** **000** ☒
 Contents \$ **000** **000** **000** ☒

Completed Modules

- ☒ Fire-2
☐ Structure-3
☐ Civil Fire Cas.-4
☐ Fire Serv. Cas.-5
☐ MHA-6
☐ Hazmat-7
☐ Wildland Fire-8
☒ Apparatus-9
☒ Personnel-10
☐ Hazmat-11

H1a Casualties#None

Deaths Injuries
 Fire Service **0001** **0004**
 Civilian **0001** **0004**
H2 Detector
 Required for Confined Fire.
 1 ☐ Detector alerted occupants
 2 ☐ Detector did not alert time
 3 ☐ unknown

H3 Hazardous Materials Release

- ☐ None
 1 ☐ Material Gas: gas leak, no reaction or vapor release
 2 ☐ Explosive gas: gas leak, no reaction or vapor release
 3 ☐ Corrosive: volatile liquid that can cause damage
 4 ☐ Flammable: gas having vapors or liquids always
 5 ☐ Diesel fuel/oil: volatile liquid that can cause damage
 6 ☐ Household solvents: ammonia, oil, cleaning only
 7 ☐ Motor oil: clean engine oil or petroleum products
 8 ☐ Paint: any paint used within 100 feet
 9 ☐ Other: liquid that causes damage or spill > 10 gal.
 10 ☐ None

I Mixed Use Property

- ☒ Not Mixed
 10 ☐ Residential use
 20 ☐ Educational use
 30 ☐ Medical use
 40 ☐ Residential use
 50 ☐ Gov. or stores
 60 ☐ Religious use
 70 ☐ Bus. & Residential
 80 ☐ Office use
 90 ☐ Industrial use
 100 ☐ Military use
 110 ☐ Farm use
 120 ☐ Other mixed use

J-Property Use#-Structures

- 131** Church, place of worship
181 Restaurant or cafeteria
193 Bar/club or nightclub
213 Elementary school or kindergarten
218 High school or junior high
241 College, adult education
311 Care facility for the aged
331 Hospital
Outside
124 Playground or park
655 Camp or wooded
669 Forest (timberland)
907 Outdoor storage area
919 Swamp or sanitary landfill
931 Open land or field

- 341** Clinic, clinic type-infirmary
342 Doctor/dentist office
361 Prison or jail, not juvenile
419 1-or 2-family dwelling
429 Multi-family dwelling
439 Rooming/boarded house
449 Commercial hotel or motel
459 Residential, board and care
464 Dormitory/barracks
419 Wood and beverage sales
936 Vacant lot
938 Graded/clear plot of land
946 Lake, river, stream
981 Railroad right of way
960 Other street
961 Highway/divided highway
962 Residential street/driveway
559 Household goods, sales, repairs
579 Motor vehicle/boat sales/repair
571 Gas or service station
509 Business office
615 Electric generating plant
629 Laboratory/science lab
700 Manufacturing plant
819 Livestock/poultry storage (barn)
882 Non-residential parking garage
891 Warehouse
981 Construction site
984 Industrial plant yard
 Looking and enter a Property Use code only if you have not checked a Property Use box:
 Property Use **142**
Clubhouse
 Wildland Fireline 03/11/98

Claim

RECEIVED

OCT 26 2004

BIG/CLAIMS



10-10-61
 10-10-61
 10-10-61



10-10-61
 10-10-61



10-10-61
 10-10-61



Insured *611-111-1111*
 File # *67-4770*
 Photo # *4-11-68-1-1-1*



Photo # *4-11-68-1-1-1*

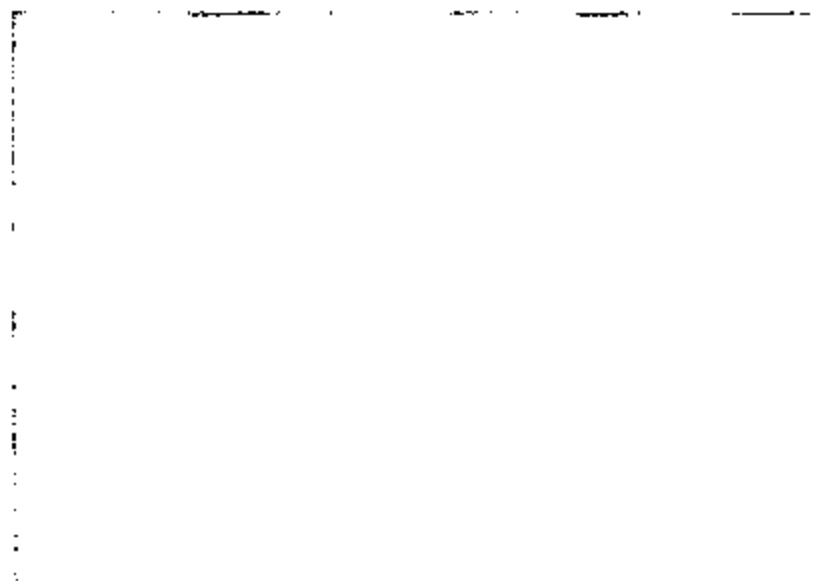


Photo #



10/27/04 10:27:04
10/27/04 10:27:04
10/27/04 10:27:04
10/27/04 10:27:04



_____)
_____)
_____)

CASE NO.:

FORD MOTOR COMPANY.

COMPLAINT

_____ and avers as follows:

1. Plaintiff [REDACTED] (hereinafter referred to as [REDACTED]), is an insurance company domiciled in the State of Connecticut and authorized to do business in Tennessee [REDACTED] is the Subrogee of [REDACTED] who is and was at all times material hereto a resident of Knox County, Tennessee.

2. The Defendant, Ford Motor Company, Inc., (hereinafter referred to as Ford), is a corporation organized under the laws of the state of Delaware and licensed and doing business in Tennessee. The Registered Agent is listed as being: CT Corporation, Systems, 530 Gay Street, Knoxville, Tennessee, 37902.

3. This Court has jurisdiction over this dispute pursuant to T.C.A. §20-4-101.

Venue is proper pursuant to T.C.A. §16-10-101. The incident giving rise to this

complaint occurred in Knox County, Tennessee. Defendant is subject to the jurisdiction of this Court by virtue of Defendant transacting business in Tennessee and by committing acts or omissions that proximately caused damage in Knox County, Tennessee. The amount in controversy is greater than \$15,000.00

FACTS

4. On or about November 26, 2001, [REDACTED] Daughter, had parked [REDACTED]'s vehicle, a 1998 Lincoln Navigator, VIN # SLMFU28L6W [REDACTED] Tennessee license plate # [REDACTED] in the garage at [REDACTED], Knoxville, TN.

5. A fire originated within the engine compartment of the vehicle, at or around the brake system master cylinder located on the left side of the firewall, between the engine and left inner fender.

6. The fire was caused by the failure of the electric/hydraulic switch for the speed control braking system, and/or another malfunction in the engine compartment, causing electrical wiring and/or combustible fluids of the brake system to ignite.

7. The fire caused damage to the vehicle as well as to an adjacent 2000 Chevy Cavalier and the residence of the insured.

8. On or about December 4, 2001, and December 11, 2001, Traveler's made payments for the claim to the insured and the lien holder of the vehicle in the total amount of \$28,019.10.

9. Travelers has become subrogated to the rights of the insured [REDACTED] by virtue of [REDACTED]'s status as a policyholder and as a result of the property damages sustained on or about November 26, 2001, and the payments and expenses

heretofore made, or to be made in the future by Travelers, and pursuant to the subrogation laws of the State of Tennessee.

COUNT I
NEGLIGENCE

10. Plaintiff reaffirms and reasserts paragraphs 1-9 of this Complaint as though fully set forth herein.

11. Defendant, Ford Motor Company, is now, and at all times mentioned in this complaint was, in the business of designing, manufacturing, constructing, assembling, inspecting, and selling automobiles, including a 1998 Lincoln Navigator.

13. Defendant so negligently and carelessly designed, manufactured, constructed, assembled, inspected, installed, and sold the 1998 Lincoln Navigator which Mr. Spath eventually purchased which was dangerous and unsafe for its intended uses.

14. Defendant was negligent in designing, manufacturing, constructing, assembling, inspecting and/or installing an electric/hydraulic switch for the speed control breaking system, and/or another component in the engine compartment.

15. Defendant foresaw or should have foreseen that the electric/hydraulic switch for the speed control breaking system, and/or another component in the engine compartment could cause a fire in the engine compartment if not designed, manufactured, constructed, assembled, installed and/or inspected properly, and owed a duty to consumers or customers or other users to design, manufacture, construct, assemble, install and/or inspect the components in such a manner as to prevent fires in the engine compartment.

16. Defendant breached the duty to design, manufacture, construct, assemble, inspect and/or install the electric/hydraulic switch for the speed control breaking system,

and/or another component in the engine compartment in such a manner as to prevent their malfunction causing a fire in the engine compartment.

17. The malfunctioning electric/hydraulic switch for the speed control breaking system, and/or another component in the engine compartment was the proximate or legal cause of the fire and the resulting injury, damage, or loss to [REDACTED]

Count II
Breach of Warranty

18. Plaintiff reaffirms and realleges paragraphs 1 through 17 of this complaint as though fully set forth herein.

19. Upon information and belief, Defendant expressly or impliedly warranted the electric/hydraulic switch for the speed control breaking system, and/or another component in the engine compartment, to function in such a way as to not cause a fire in the engine compartment of the vehicle

20. Upon information and belief, by advertisements or other public statements, Defendant impliedly or expressly represented to consumers, customers, or other end users that the electric/hydraulic switch for the speed control breaking system, and/or another component in the engine compartment was safe to use and/or had safety features built in to prevent an incident similar to or like the one alleged herein from occurring. To the extent that Defendant tries to disclaim such warranties, such disclaimers fail under state law.

Count III
Strict Product Liability

21. Plaintiff reaffirms and realleges paragraphs 1 through 20 of this complaint as though fully set forth herein.

22. At all times mentioned in this complaint, the electric/hydraulic switch for the speed control breaking system, and/or another component in the engine compartment were defective as to design, manufacture, and warnings, causing the electric/hydraulic switch for the speed control breaking system, and/or another component in the engine compartment to be in a dangerous and defective condition that made them unsafe for their intended use.

33. As a direct and proximate result of the defective and dangerous condition of the electric/hydraulic switch for the speed control breaking system, and/or another component in the engine compartment described above, plaintiff's vehicle and residence were destroyed and/or damaged by fire and plaintiff's home, personal belongings, and furnishings were damaged by smoke and water used to put out the fire.

Prayer for Relief

Wherefore, premises considered, Plaintiff prays that:

1. Process be issued and Defendant served.
2. After discovery and trial on the merits, Defendant be adjudged liable and judgment entered against it and for an amount for \$28,019.10.
3. Plaintiff be awarded costs and expenses of litigation as permitted by law.
4. Plaintiff be awarded pre-judgment and post-judgment interest as allowed by law.
5. Plaintiff be afforded all other relief or remedies allowable under law, that justice demands or that this suit requires.

Respectfully Submitted,



Perry A. Craft (BPR #8055)

Michael G. Sheppard (BPR # 19888)

Craft, Sheppard & Sittou, Attorneys at Law

500 Church Street, Suite 580

Nashville, TN 37219

COST BOND

I am surety and will assume all costs.



Michael G. Sheppard

Dated: 12.22.04

CERTIFICATE OF SERVICE

I do hereby certify that a true and exact copy of the foregoing document has been sent via U.S. Mail, postage prepaid, to Ford Motor Company, c/o CT Corporation Systems, 530 Gay Street, Knoxville, TN 37902; on this 22nd day of December, 2003.



Robert A. Doll, II

Travelers

Paul Kasdorf
PO BOX 2954
MILWAUKEE, WI 532
Phone: (800)624-6007
Fax: (262)827-1938



November 30, 2001

Ford Motor Co
Parklane Towers West STE 300
Three Parklane Blvd
Dearborn, MI 48126-2568

Our Client: [REDACTED]
Date of Loss: 11/26/2001
Our File No: [REDACTED]
VIN: 5LMFU28L6W1 [REDACTED]
Make/Model: 1998 Lincoln Navigator

Dear Ford Motor Co;

We are handling a claim for [REDACTED] who sustained a loss on 11/26/2001.

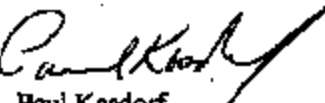
Our investigation reveals that you may be legally responsible for this loss, and we look to you to satisfy this obligation. The vehicle had just been parked and about 10 minutes later, fire was coming from under the hood near the power brake system. The vehicle will be a total loss and is being securely stored at Copart in Nashville, TN. To date, Travelers has not done any destructive testing to the vehicle.

The damage estimates are still forth coming, but expected to be around \$35000. There was also property damage as a result of the fire.

If you have insurance, please complete the attached form and return it to me. Please refer this letter to them immediately, requesting they contact our offices. Should you not have insurance, we expect payment from you directly. Please contact me to discuss repayment options.

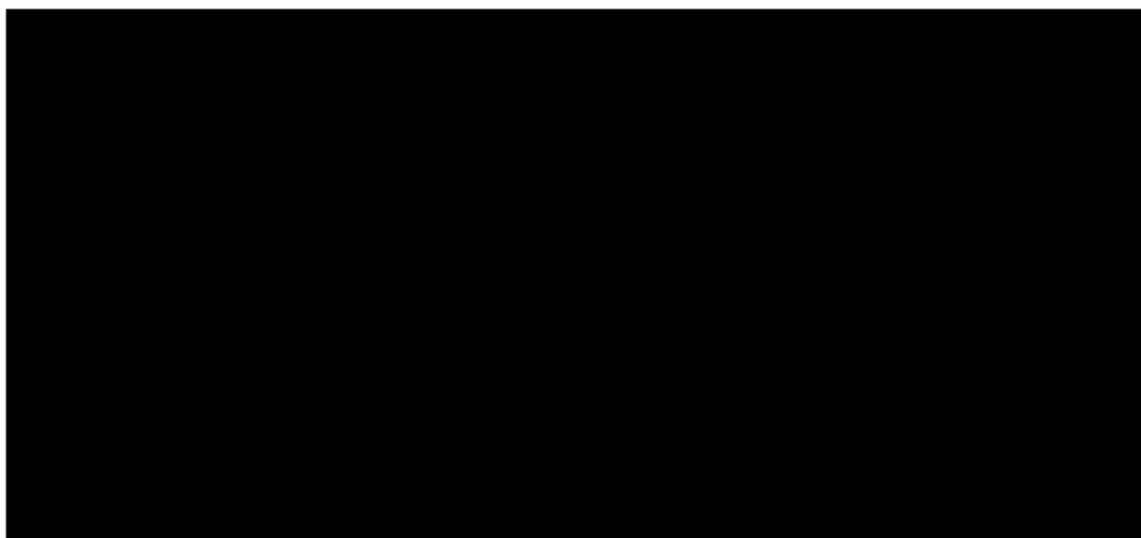
Please call me with any questions.

Sincerely,


Paul Kasdorf
Claim Investigator

- 11/26/01
- 198 Nav
- VIN

Enc. Insurance Questionnaire
TF - First Notice.doc



[REDACTED] : 14TH JUDICIAL DISTRICT COURT
VS. NO. 03-67 : PARISH OF CALCASIEU
FORD MOTOR COMPANY : STATE OF LOUISIANA
FILED: JAN 09 2003 : Sherry White
DEPUTY CLERK OF COURT

SUPPLEMENTAL AND AMENDING PETITION

NOW INTO COURT, through undersigned counsel, comes [REDACTED]

[REDACTED] who in
supplementing and amending the original Petition for Damages in the
referenced matter, respectfully represent the following:

I.

By amending the caption of the Petition as follows:

[REDACTED] : 14TH JUDICIAL DISTRICT COURT
VS. NO. 03-67 : PARISH OF CALCASIEU
FORD MOTOR COMPANY : STATE OF LOUISIANA
FILED: _____ : _____
DEPUTY CLERK OF COURT

II.

Petitioners seek to supplement their original petition by
adding the following paragraph:

7a.

"As a result of the incident described above, [REDACTED] was
required to expend a sum which represents his insurance
deductible."

III.

Petitioners reallege and reurge all of the allegations in the
original Petition as if written herein in extenso.

IV.

Defendants have yet to file responsive pleadings,
therefore Petitioners need not seek leave to file the Supplemental
and Amended Petition for Damages.

WHEREFORE, petitioners pray that Defendant, FORD MOTOR
COMPANY, be served with this Supplemental and Amending Petition for

I:\DOCS\LC\0001\17566\widge\amended petition.spd

Damages and be required to make answer hereto.

PRAY FURTHER for all Orders and Decrees necessary in
the premises and for full, general and equitable relief.

By their attorneys,

STOCKWELL, SIEVERT, VICCELLIO,
CLEMENTS AND SHADDOCK, L.L.P.

BY: 

RANDALL C. MULCAHY (BAR #26436)
POST OFFICE BOX 2900
LAKE CHARLES, LA 70602
PHONE: (337) 436-9491
FAX : (337) 493-7210

[REDACTED]
VS. NO. 03-67

FORD MOTOR COMPANY

FILED: JAN 09 2003

: 14TH JUDICIAL DISTRICT COURT
:

: PARISH OF CALCASIEU

: STATE OF LOUISIANA

: o/Hibory White
DEPUTY CLERK OF COURT

ORDER

Let the forgoing Supplemental and Amending Petition for Damages be filed as prayed for and let Defendant be cited to appear and answer the Petition.

Lake Charles, Louisiana, this 8th day of January, 2003.

Robert S. White
District Judge

PLEASE SERVE:

FORD MOTOR COMPANY
through its registered agent
C.T. Corporation System
8550 United Plaza Boulevard
Baton Rouge, Louisiana, 70809

A TRUE COPY
Lake Charles, Louisiana
Amiee White
Deputy Clerk of Court
Iceton Parish, Louisiana
JAN 13 2003

State Farm Insurance Companies



July 19, 2002

Auto Subrogation Unit
P.O. Box 11890
Monroe, Louisiana 71211
1-800-448-4225 Team 11
Fax 1-800-728-4083

Ford Motor Co.
3 Parklane Blvd. Ste. 400
Dearborn, MI 48126-2568

RE: Claim Number: 18-0637-416
Date of Loss: January 8, 2002
Our Insured: Eric Buquet



Dear Sir:

This State Farm insured's vehicle, 1995 Ford F150 VIN 1FTEK15Y5SK[REDACTED], was involved in a loss due to defective brake pressure switch. We settled a claim with our insured in the amount of \$9,438.15, which includes our insured's deductible.

Our investigation revealed the cause of the loss was due to defective brake pressure switch.

Enclosed is the documentation of State Farm's claim. We are holding the vehicle until we have concluded our claim with your company. You may contact me at the phone number below to make arrangements to inspect the vehicle.

Please consider this letter as our demand to Ford for reimbursement of \$9,438.15.

Page 2
July 19, 2002

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

Sincerely,

Virginia Coody
Claim Specialist
(800) 448-4525

State Farm Fire and Casualty Company

ERG5-005-LC-0679

ENGINEERING REPORT

A Professional Association

**Fire Cause Examination on a 1995 Ford F150
Pickup Truck at Co-Parts Auto Salvage
in Lufkin, Texas**



18-0637-416 3P

Prepared for

**State Farm Insurance Company
Monroe, Louisiana**

by

**Ron McKinley, P.E.
Engineering Design Consultants
June 20, 2002**

**Client Reference No: 18-0637-416
Engineering File No: SFM02-143D**

RECEIVED

JUN 28 2002

MONROE CSO

ENGINEERING DESIGN CONSULTANTS

703 E. MARSHALL AVENUE • SUITE 400B • LONGVIEW, TEXAS 75601
(909) 226-2702

EDCS-005-LC-0660

Project Engineer: Ron McKinley, P.E.

Project File No: SFM02-143D

**Address: P.O. Box 9210
Monroe, Louisiana 71211-9210**

Attention: Randy DeBruhl

Client Reference No: 18-0637-416

Date of Loss: December 8, 2001

Location of Loss: Iowa, Louisiana

Insured: [REDACTED]

**Fire Cause Examination on a 1995 Ford F150
Pickup Truck at Co-Parts Auto Salvage
in Lufkin, Texas**

Assignment:

On June 11, 2002, I received an assignment from Randy DeBruhl with [REDACTED] in Monroe, Louisiana. Mr. DeBruhl requested an examination on a 1995 Ford F150 Truck that was damaged by a fire on January 8th while parked. According to the owner, [REDACTED] the truck was driven approximately 30 miles and parked. About an hour later, someone noticed a fire in the engine compartment and reported it. It was extinguished with hand-held fire extinguishers.

I was asked to examine the truck to determine how the fire began. It is being held at Co-Parts Auto Salvage in Lufkin, Texas. I traveled to their place of business on June 17th to begin my examination.

On-site Examination:

[REDACTED] truck can be seen in photographs 1 through 4. It is a 1995

Ford F150 Pickup Truck with the Vehicle Identification Number

1FTEX15Y3SK I began by walking around the truck while viewing the external surfaces. The only evidence of the fire is the burned place on the hood shown in photograph 5. I opened the driver side door and found no fire damage to the interior (see photograph 6).

I opened the hood and began viewing the engine compartment. It can be seen in photographs 7 through 10. As shown in the photographs, the only fire damage is on the driver side of the compartment. The burn patterns indicate a fire that began at the location of the brake master cylinder. I viewed the damage up-close and found only the brake fluid reservoir and brake pressure switch to be damaged. The fire was extinguished before it spread beyond its origin point. This allowed an accurate determination of where the fire began. I traced the electrical wires connected to the pressure switch and found their insulation burned away but the copper conductors are still intact. The only other wires near the fire origin point are those routed to the hood light. They are indicated in photographs 18 and 19. I examined the wires and found their

insulation still intact with only minor heat stress.

The brake fluid reservoir is made of a polymer material and is melted on its top surfaces. This can be observed in photographs 13 through 16. The most severe damage to the reservoir occurred next to the pressure switch as shown in photographs 15 and 16. As shown in the photographs, the switch housing is heavily charred and is the most heavily damaged component.


The National Highway Traffic Safety Administration issued Recall Number 99V124 for potential defects in the brake pressure switch (cruise control deactivation switch) for Ford vehicles built in the years 1992 and 1993. However, the same burn pattern in other Ford vehicles built in years 1992 through 2000 have been observed. The defective switches have caused engine compartment fires.

Conclusions:

The fire resulted from a defective brake pressure switch. The switch has been problematic in causing fires in several model vehicles resulting in a recall.

The fire was discovered in its early stages and extinguished. This preserved the evidence that shows the origin point of the fire to be at the brake switch. The primary fuel for the fires appears to be the brake fluid once the plastic reservoir melts. [REDACTED] stated that two extinguishers were needed to suppress the fire.

The brake switch and related equipment were left in the truck unaltered. This will give any interested parties their chance to view the damage.


Ron McKinley, P.E.

PHOTOGRAPHS

Photograph 5 - Heat damage on hood.

Photograph 6 - View of interior.

Photograph 7 - View of engine compartment where fire occurred.

Photograph 8 - Additional view of engine.

Photograph 9 - Passenger side of engine compartment.

Photograph 10 - Driver side view of engine compartment.

Photograph 11 - Where fire occurred.

Photograph 12 - Close-up of fire damage.

Photograph 1 – Driver side view of Ford Truck.

Photograph 2 – Passenger side of truck.

Photograph 3 – Rear view of truck.

Photograph 4 – Additional view of truck.

Photograph 13 – Remains of brake fluid reservoir.

Photograph 14 – Additional view of damage.

Photograph 15 – Arrow indicates brake pressure switch.

Photograph 16 – Close-up of switch and reservoir.

Photograph 17 – Additional view of switch.

Photograph 18 – View of hood light wiring.

Photograph 19 – Additional view of wires.

Photograph 20 – Oil on dipstick.

PRE-LOSS CONDITION

INTERIOR:	(Explain if other than average condition for year, make and model vehicle)	Above Avg	Avg	Below Avg
Seats:		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Carpet:		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Glass:		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Door:		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Headliner:		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
EXTERIOR:	(Explain if other than average condition for year, make and model vehicle)			
Sheet Metal:		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Paint:		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Trim:		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
MECHANICAL:	(Explain if other than average condition for year, make and model vehicle)			
Engine:		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Transmission:		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

PRIOR DAMAGE: ☒ Yes ☐ No Estimate Written: ☒ Yes ☐ No Amount _____ Damage Location: F

OVERALL CONDITION: ☐ Above Avg. ☒ Avg. ☐ Below Avg.

Salvage Will Be: ☒ Rebuilt ☐ Sold for parts ☐ Scraped

CHRIS FEDUCCIA

1/15/02

INSPECTED BY

DATE

TOTAL LOSS SETTLEMENT

Method used to determine base price: (Check one) ☐ Computerized Evaluation ☐ Comparable Vehicles ☐ Book Value

Vendor Name: _____ Amount _____

Did you pay the computerized evaluation amount? ☐ Yes ☐ No If no, explain: _____

Adjusted Amount _____

Salvage A Telephone Number	Circle No.	Date	Make & Model	Available	Price
1				No	
2				No	
3				No	

Vehicle number(s) used to determine base price: ☐ 1. ☐ 2. ☐ 3.

Explain any adjustments for difference in mileage, equipment condition, prior damage, etc: _____

Adjusted Amount _____

Book(s) used: _____ Basic Book Price _____

List additions or deductions for equipment, mileage, etc, and prior damage: _____

Adjusted Amount _____

Did you pay this amount? ☐ Yes ☐ No If No, explain: _____

Base Price	\$	Salvage Disposition	Purchaser:
Tax	+	Date Sold	Remarks:
Fees	+	Date Ramblance Received	
Actual Cash Value	=	High Salvage Bid	\$
Owner Retained Salvage	-	Towing Expense	45.00
Deductible	-	Storage Expense	-
Lienholder Payoff	-	Miscellaneous Expense	-
Amount Paid Owner	\$	Net Salvage Return	\$
Date Settled			Date: MAY 03 2002

CLAIM REP. SIGNATURE

Preliminary Valuation Report
State Farm Insurance

1700 East College Street, Lake Charles LA 70607

Date: 1/15/02 Valuation ID: 18-0637-41601
 Claim: [REDACTED] Type of Loss: D
 Policy: [REDACTED] Classification: Total Loss
 Customer: [REDACTED] Assessor:
 Loss Date: 12/4/01 Assessor ID:
 Deductible: \$500 Profile: State Farm
 Payer Code: State: LA

Vehicle: 1995 Ford Pickup F150 XL 2D PknpXCh 7' Bed 139" WB 4.9L Inj 6 Cyl
 VIN: 1FTEX15Y5S [REDACTED] Type: Truck
 Mileage: 137,913 License: [REDACTED] LA
 Condition: Color:

N.A.D.A.® SOUTHWESTERN VALUES

F150 PICKUP-V8 STYLE SPACAS XL 63/4'

Base Value	\$10,075
Mileage Adjustment	<\$3,200>
Air Conditioning	Standard
Power Brakes	Standard
Without Power Windows	No Adjust
Without Power Door Locks	No Adjust
Tilt Steering Wheel	Standard
Cruise Control	Standard
Without Electric Defogger	No Adjust
AM-FM Stereo	Standard
Without Leather Seats	No Adjust
Automatic Transmission	Standard
Without 6 Cyl. Engine	No Adjust

Total Retail Value \$6,875

Mitchell International Corporation warrants that this valuation is an accurate representation of the N.A.D.A.® value guide.

AVERAGE VEHICLE VALUE \$6,875.00
 Taxable Adjustments

Taxable Adjustments Total \$0.00

Pre-Tax Subtotal \$6,875.00

Post-Tax Subtotal \$6,875.00

Non-Taxable Adjustments

Deductible

<\$500.00>

Non-Taxable Adjustments Total

<\$500.00>

NET TOTAL

\$6,375.00

Customer: ERIC BUQUET

Impact Points: Non-Collision



18-0637-416 2F

Mar-21-2002 05:12pm From:

T-470 P.001 F-420



RICK BRYANT
District Attorney
FOURTEENTH JUDICIAL DISTRICT
CALCASIEU PARISH



10-0037-416 3F

RONALD A. ROBERTO
FIRST ASSISTANT
DISTRICT ATTORNEY

TELECOMMUNICATIONS MEMORANDUM

YOUNG MAN
P.O. BOX 3000
LAKE CHARLES, LA. 70601
PHONE: (337) 437-4000
FAX: (337) 437-4000

DATE: 3/21/02

TIME: 04:15 PM

NUMBER OF PAGES (INCLUDING COVER SHEET): 4

MESSAGE TO: JJ Culpepper

FIRM: STato Firm

FACSIMILE: 800/726-4053

MESSAGE FROM: Roger Warr

PHONE NO.: 337/437-3422

FACSIMILE: (337) 437-4121 / 922

MATERIAL TRANSMITTED: Affidavit of Vehicle Fire

Claim # [REDACTED]

MESSAGE: _____

IF ANY DIFFICULTY IS EXPERIENCED WITH THIS TRANSMISSION,

PLEASE CALL _____ AT (337) 437-3400.

Mar 23 2002

The information contained in this transmission may be attorney privileged and confidential. It is intended only for the use of the individual entity named above. You are hereby notified that any communication, distribution or copy of this communication may be strictly prohibited by law. If you have received this communication in error, please notify us immediately by telephone and return the original message to us at the above address via U.S. Postal Service. We will reimburse you for your call and postage. Thank you.



State Farm Fire and Casualty Company
State Farm Indemnity Company
State Farm Mutual Automobile Insurance Company
State Farm County Mutual Insurance Company of Texas

Barcode Only

Date Received

1. Name of insured

Address

Date of Birth

Social Security

Occupation

Address

2. Date of Fire

Name of Vehicle

Vehicle ID #

Certificate of Title #

Number of cylinders

Was vehicle damaged?

When did you last see your vehicle?

Specific location where vehicle burned

Reason vehicle was left at this location

Name and address of person who left vehicle at this location

When was the fire discovered?

Who made the discovery?

When was fire reported to fire department?

Name and location of fire station

Describe fire (intensity, color of flames, nature)

Was vehicle being driven?

or fire extinguished or mechanical breakdown?

was in my office, I noticed it

when he left my office to go to the dentist,

we put the fire out with 2 fire extinguishers

MAY 03 2002

EROS-885-LC-0896

Were you carrying a container of flammable liquid in the vehicle at the time of fire? ☐ Yes ☒ No

If yes, give type of liquid none amount none size none

type of container none location of container at time of fire none

Did you smell smoke or see flames first? I think I saw flames + smoke under

Have you had similar problems prior to fire? ☐ Yes ☒ No If Yes, explain none

Has vehicle been damaged during the past three years? ☐ Yes ☒ No If so, give location none

type of damage none amount of damage \$ none and date none

Were repairs made? ☐ Yes ☐ No ☐ Partial If so, were they completed? ☐ Yes ☐ No

Who made the repairs?

Name and address of insurance company who paid claim damages, if any none

Any other claims in the last three years on this or any other make? ☐ Yes ☒ No

Any other vehicles in your household? ☐ Yes ☒ No

Name of insurance company and agent on other vehicles

Your other insurance company and agent

Any home/auto claims within the past 6 months with State Farm? ☐ Yes ☒ No

With any other carrier? none

3. Vehicle Equipment (Check if vehicle had any of the following)

<input type="checkbox"/> Radio AM	<input checked="" type="checkbox"/> Power Windows	<input type="checkbox"/> Vinyl Floor	<input checked="" type="checkbox"/> Cruise Control	<input type="checkbox"/> Traction Control
<input checked="" type="checkbox"/> AM/FM	<input checked="" type="checkbox"/> Power Doorlocks	<input type="checkbox"/> Tinted Glass	<input type="checkbox"/> Convertible Top	<input type="checkbox"/> V6/V8
<input type="checkbox"/> Stereo	<input type="checkbox"/> Power Locks	<input type="checkbox"/> Map Lights	<input type="checkbox"/> Sunroof/Moonroof	<input checked="" type="checkbox"/> Automatic
<input checked="" type="checkbox"/> Tape Deck	<input type="checkbox"/> Power Windows	<input type="checkbox"/> TV/Video	<input type="checkbox"/> Fog Lights	<input type="checkbox"/> Standard
<input checked="" type="checkbox"/> Air Cond.	<input type="checkbox"/> Power Mirrors	<input type="checkbox"/> Tire Monitoring System	<input type="checkbox"/> Special	<input type="checkbox"/> Console
<input type="checkbox"/> Other				<input type="checkbox"/> Auto-Shift

☐ CD Radio Type Cost \$ Date installed

Purchased From

4. Vehicle Condition

Engine	<input type="checkbox"/> Fair	<input type="checkbox"/> Good	<input checked="" type="checkbox"/> Excellent
Transmission	<input type="checkbox"/> Fair	<input type="checkbox"/> Good	<input checked="" type="checkbox"/> Excellent
Drivetrain	<input type="checkbox"/> Fair	<input type="checkbox"/> Good	<input checked="" type="checkbox"/> Excellent
Body	<input type="checkbox"/> Fair	<input checked="" type="checkbox"/> Good	<input type="checkbox"/> Excellent

Other distinguishing features (stems, decals, lettering, etc.)

3. Name and address of service station:
 Where petroleum product was purchased: me Date last serviced: March 15
 When petroleum product was inspected: March 15 Date last inspected: March 15

4. Date car purchased: 1996 ☐ New ☒ Used Purchase price: \$14,995

Title to: None
 Dealer (Company/Individual Name and Address): Pubba Car Sales (Pawnee, Pa.)
 How did you learn the car was for sale? Salesman David Weston
 How was the car paid for? ☐ Cash ☒ Credit
 If financed, name and address of finance company: Chrysler Credit Corp

Amount of loan: \$14,995 Down payment: None Loan term: 60
 Date of last loan payment made: August 2000

Is service paid for? ☐ Yes ☒ No How long? 1 year
 Are loans in your possession? ☒ Yes ☐ No When last paid? 1 year Title tag? Yes
 Do you have other debt? ☐ Yes ☒ No Policy? Yes
 Reason of insurance coverage: Yes
 Was this a rental vehicle? ☐ Yes ☒ No If yes, name of rental: None
 Was it a recreational vehicle? ☐ Yes ☒ No If yes, date of trip: None

7. Amount for which you are making claim: \$7,500 cash

Any person who knowingly provides a false or fraudulent claim for payment of a loss or benefit or knowingly provides false information in an application for insurance is guilty of a crime and may be subject to civil fines and criminal penalties.

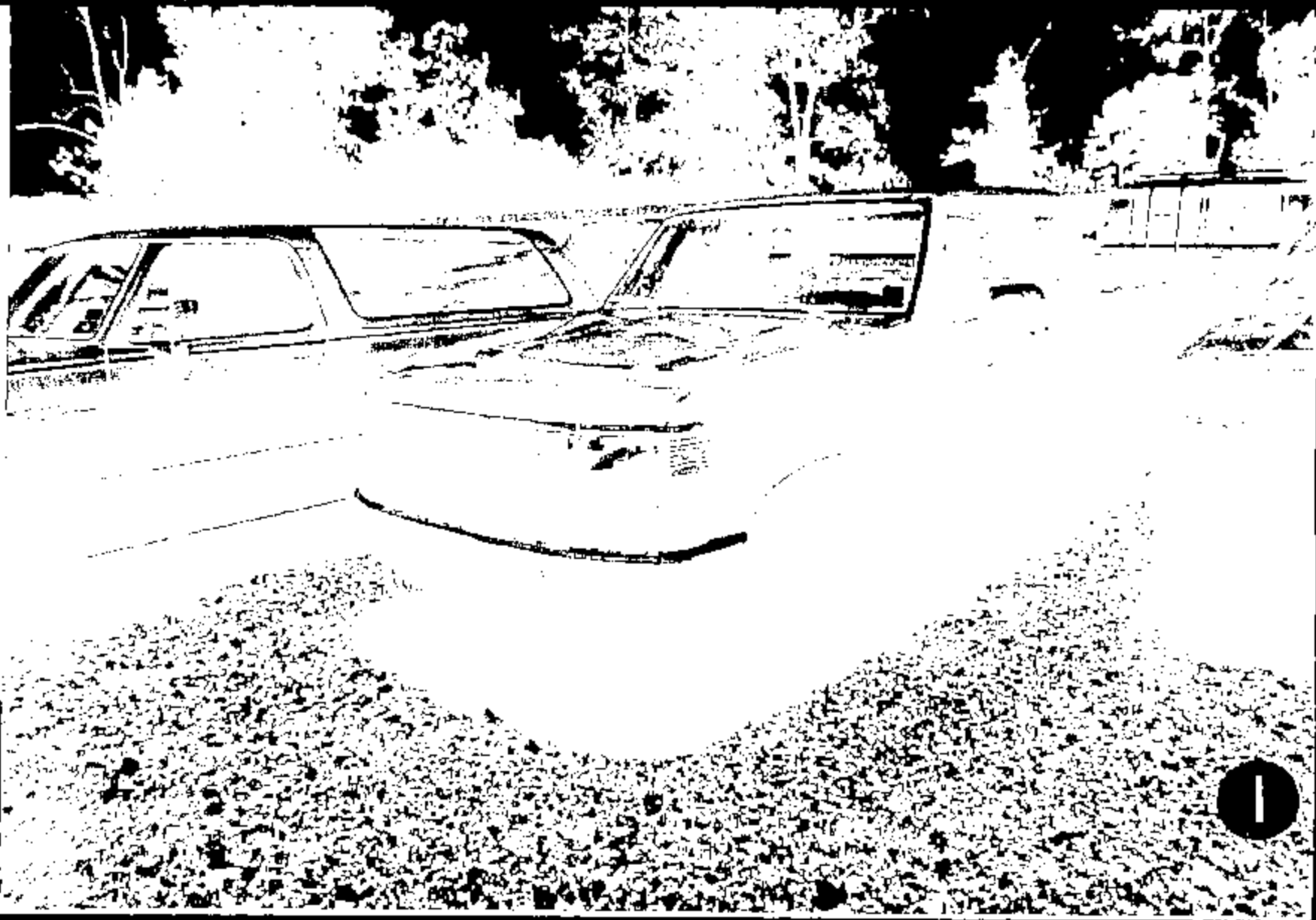
Are the charges you have given true to the best of your knowledge and belief? ☒ Yes ☐ No

Witness: _____ Police Officer: _____ Signature: _____
 Address: _____

SUBSCRIBED AND SWORN TO BEFORE ME this _____ day of _____, 1996.
 In _____ County, _____
 Notary Public _____ My commission expires: _____

100-2

0000-000-10-0000



2018-005-10-8783

2





BMF-805-LC-8702

4

ENCLOSURE



5

LR03-025-1C-8704

6



PHOTO-665-LC-8765

7

170X



ENCLOSURE LC-8786

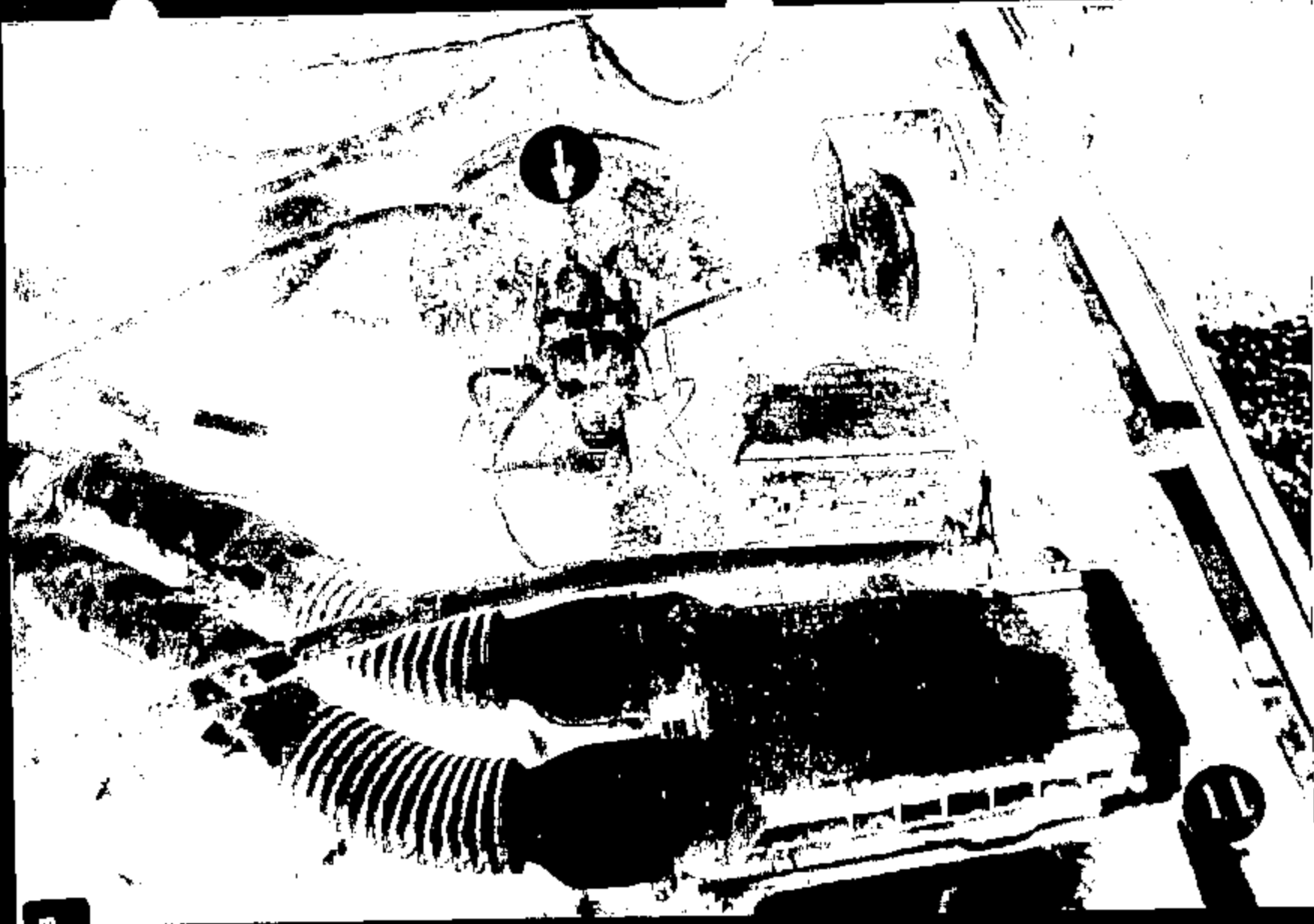
B)

EP003-000-LC-0707

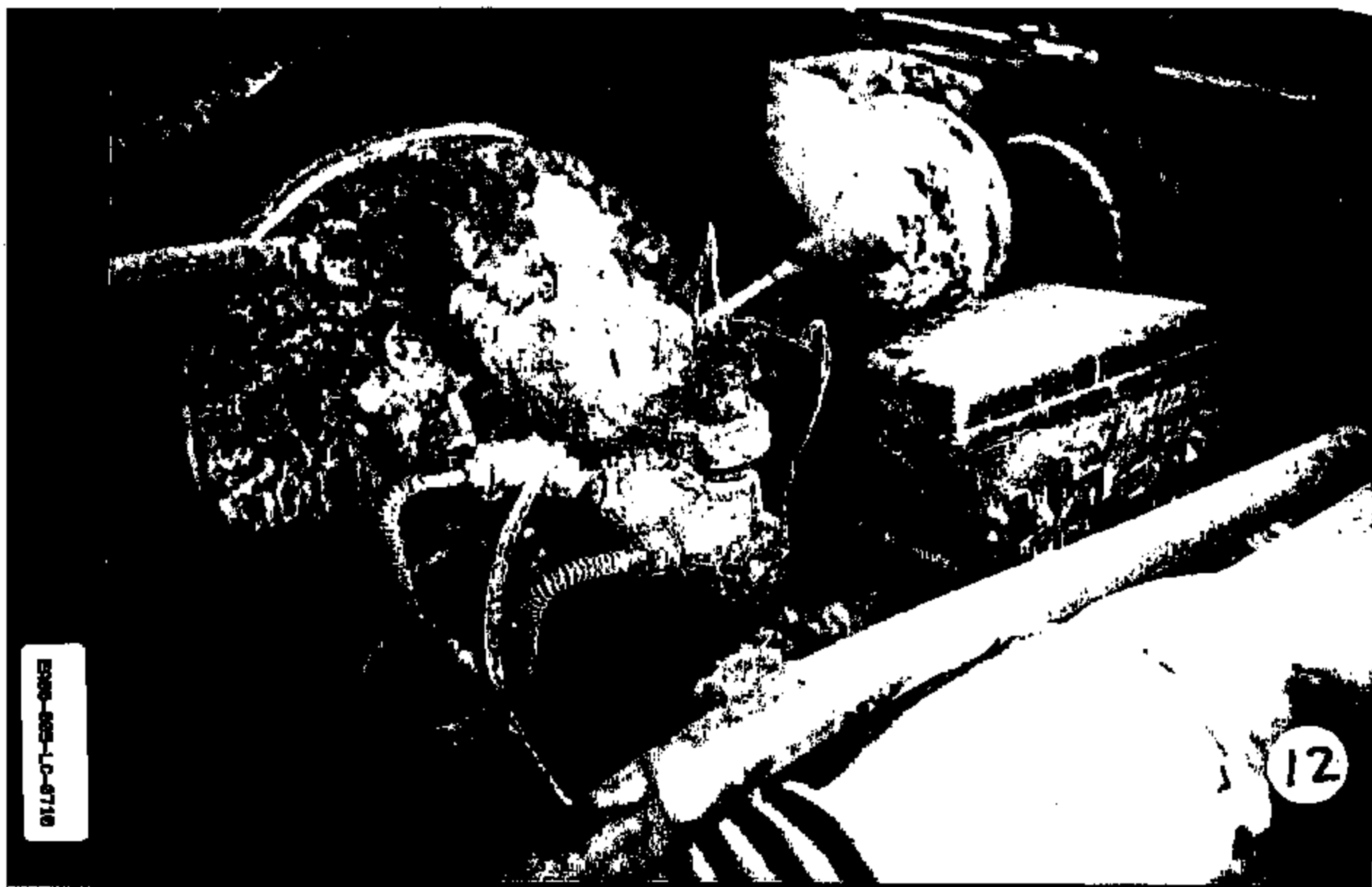
9

ENSE-005-LC-6708

10



EP25-003-10-0768

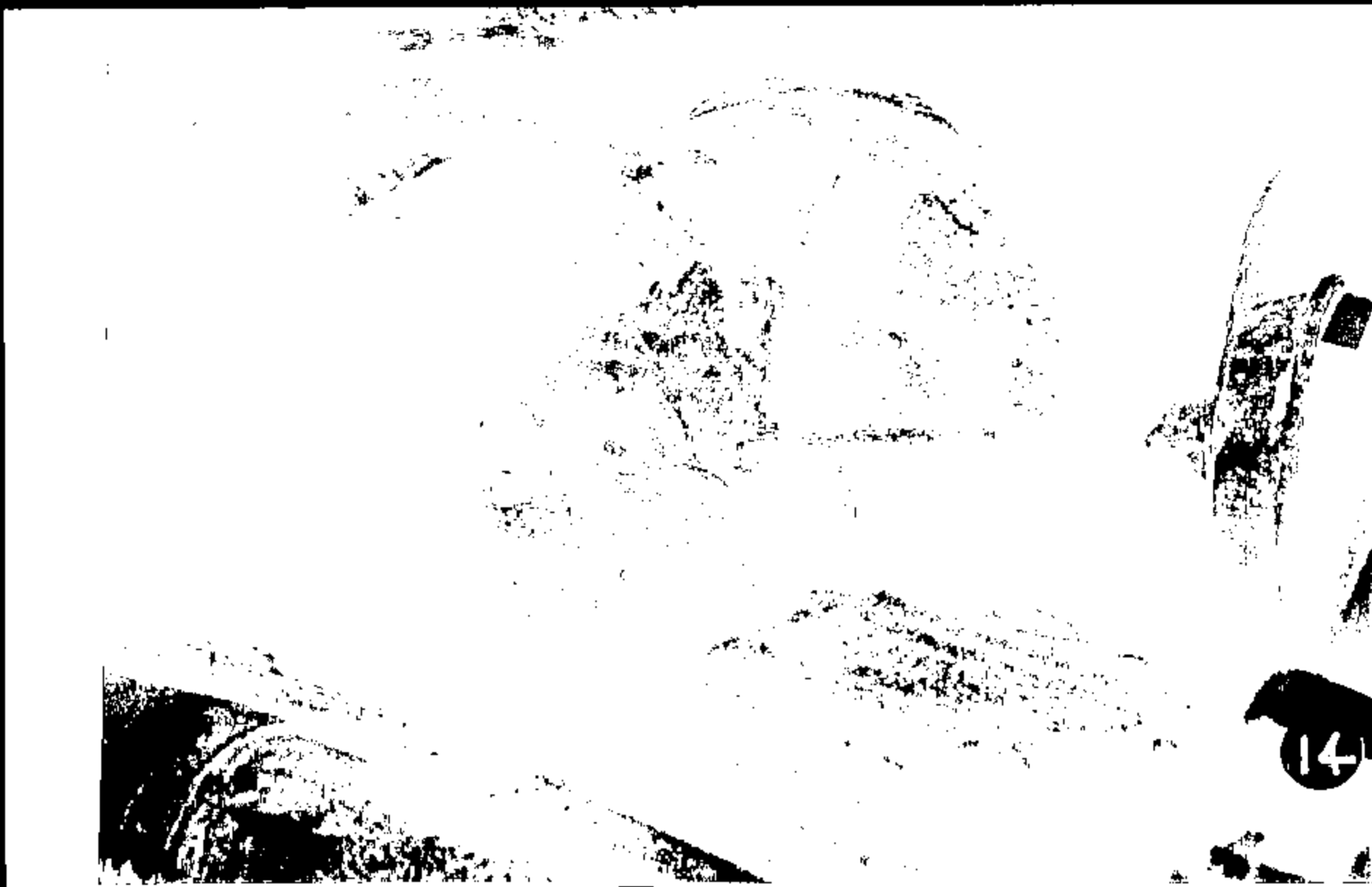


ENR-605-LC-6710

12



EROS-005-LC-0711

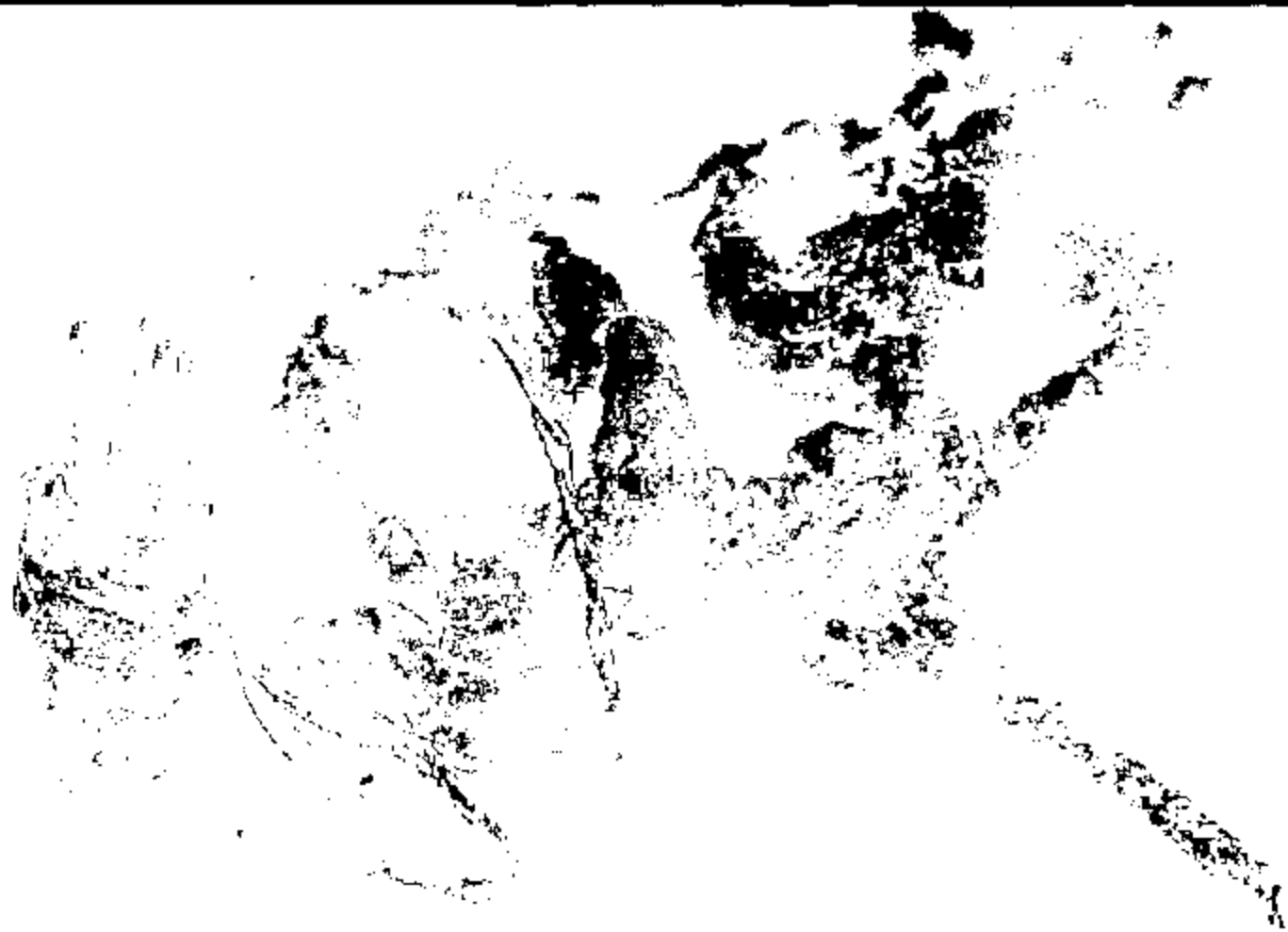


14

RM5-005-LC-0712



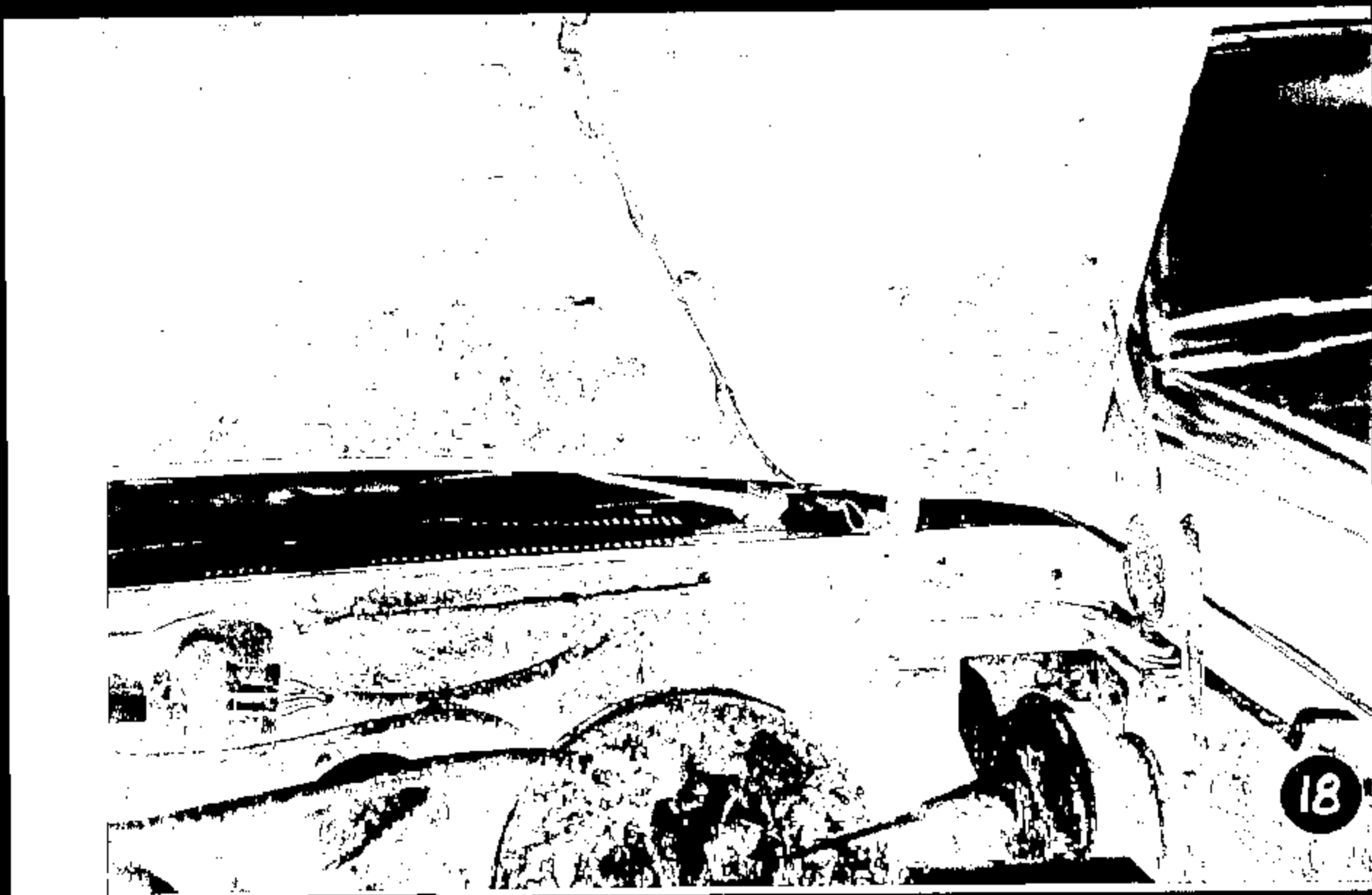
BM55-805-LC-0713



16

ENC-005-LC-0714





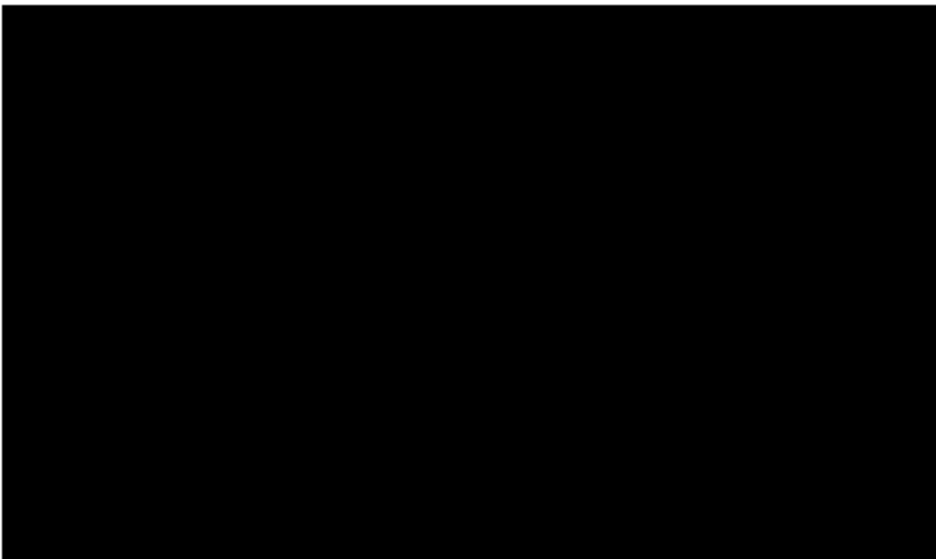
ERR-003-LC-0718

19



26

ENOS-625-LC-8718



CRAIG/is Ltd.

Insurance Services

PO Box 40569 Jacksonville Florida 32203-0569
Voice 904.807.2500 Fax 904.807.2510

VIA OVERNIGHT MAIL

September 28, 2004

Ms. Shawn L. Norton
Claims Analyst/Litigation Assistant
Ford Motor Company
Parklane Towers West
Suite 300
Three Parklane Boulevard
Dearborn, MI 48126-2568

RE [REDACTED]
Date of Loss: March 7, 2004
FFIC Claim Number: 00504130465
FFIC Insured: [REDACTED]

Dear Ms. Norton:

I am writing to you based on our recent telephone conversation and your request for information. As you are aware, CRAIG/is, Ltd. represents Fireman's Fund Insurance Company ("FFIC") in pursuing subrogation recovery of insurance funds paid to [REDACTED] as a result of the above referenced loss. FFIC did not insure the vehicle, but the property in which the 2001 Ford Expedition was garaged. In consideration of FFIC's payment in the amount of \$377,442.38, FFIC is claiming a total amount of \$377,442.38. FFIC is subrogated to the rights, claims and interests of [REDACTED] against Ford Motor Company as the entity responsible for causing the loss.

As per your request, our investigation has determined the facts of loss as follows:

On March 7, 2004, [REDACTED] noticed a hissing sound coming from their garage. They looked in the garage, which was full of smoke, but they could not see a fire. They closed the door to the garage, contacted the fire department, and exited the house. The fire originated in the engine compartment of the insured's 2001 Ford Expedition.

Our experts have concluded that an electrical failure developed in the brake pressure switch of the Ford vehicle. This switch is used as a back-up device for deactivation of the cruise control system if the main brake pedal switch should fail. It operates on the same circuit as the brake pedal switch and is, therefore, always energized. Corrosion from leakage of brake fluid leads to either a resistive short developing in the switch or overheating of the cruise control module caused by the continuous current from the switch held in a closed position by corrosion damage. The fire destroyed the master cylinder into which the suspect switch was mounted.

A Passion for Process™

www.craigis.com

ER05-005-LC-0719

CRAIG/is Ltd.

Insurance Services

PO Box 40569 Jacksonville Florida 32203-0569
Voice 904.807.2500 Fax 904.807.2510

It is our understanding that Ford previously had similar problems with the 1992 Lincoln Town Car, which led to a recall. Further, Ford is now having similar problems with Ford Expeditions, Excursions and the F-series trucks.

In light of the foregoing, we do not believe liability will be an issue in this claim. Enclosed please find the following:

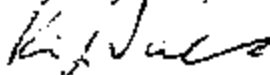
1. Expert Report
2. Damage Documentation
3. Fire Report
4. Photographs
5. ALE Documentation
6. Draft Detail Report

There were no "after market" additions or modifications that we are aware of. The engine was not running at the time of the loss, nor were the keys in the ignition.

This correspondence and all statements herein are in furtherance of settlement negotiations and as such are privileged and inadmissible. All information is provided on an informal basis for the purpose of settlement discussions. FFIC and CRAIG/is, Ltd. reserve all rights relative thereto.

Thank you for your attention to this matter and your anticipated prompt resolution of this claim. Please do not hesitate to contact me if you wish to discuss this matter. I may be reached as follows: telephone: (904) 807-2583; fax: (904) 807-2683; e-mail: kvanderkolk@craig-is.com.

Very Truly Yours,


Kevin J. Vander Kolk
Senior Associate

00564130463



Unified
Investigations & Sciences, Inc.

223 E. Greenville Lane
Dallas, Texas 75203-1613
214-946-8989
Fax 214-946-8586

PRIVILEGED AND CONFIDENTIAL

September 3, 2004

First and Final Report

PREPARED FOR: Fireman's Fund Insurance
C/o Craig's Limited
225 Water Street, Suite 1600
Jacksonville, Florida 32002

ATTENTION: Mr. Kyle Fitzpatrick/Kevin Vandercolk

INSURED: [REDACTED]

DATE OF LOSS: March 7, 2004

LOSS LOCATION: 11 Wooded Lane Allen, Texas

POLICY NUMBER: Not Specified

CLAIM NUMBER: [REDACTED]

UIS FILE NUMBER: TX01-05895

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

ER85-665-LC-6721

Insured: [REDACTED]
UIS File No.: TX01-05695

ASSIGNMENT

The assignment was received March 8, 2004, and the investigation commenced this same date. Instructions were to conduct an origin and cause investigation. This assignment was captioned to include UIS Mechanical Engineer Richard Schulze in review and assessment of the fire loss site.

DETERMINATION OF ORIGIN AND CAUSE

This fire was accidental in nature. Burning first occurred in the vicinity of the master brake cylinder housing located in the left side portion of the engine compartment. The cause was due to overheating and failure of the brake pressure switch of the brake master cylinder assembly.

Information and factors available to establish origin:

1. Area of greatest fire damage
2. Patterns of flame spread
3. Area of lowest burn

Information and factors available to establish cause:

1. Single area of origin
2. No unusual accelerated burn
3. Focused heat damage to brake master cylinder assembly
4. No other heat or ignition source found

Property owners [REDACTED] were present at the fire loss site during the initial portions of this examination. UIS Engineer Richard Schulze assisted in the completion of this review. A subsequent review of the fire scene was conducted by Mr. Larry Helton, of Newell Investigative Services, Inc. based out of Gainesville, GA. He was present representing the interests of the Ford Motor Company. Commercial Installation Manager Erin Young and Associate Council Kevin McGraw attended this subsequent exam representing the interests of Protection One Alarm Systems.

The structure involved in this fire loss was a two-story, wood frame and stucco siding home having a composition roof and a slab foundation with the main entrance facing in a southerly direction. The home was located on the north side of the cul-de-sac ending to the east/west running roadway.

No adverse conditions were encountered during this exam, and a thorough review of the fire loss was conducted. Alterations to the fire scene consisted of minor overhaul of debris in the south central garage area with the main door pulled down off of the mounting brackets. This damage was conducted during suppression duties of fire personnel.

Insured: [REDACTED]
UIS File No.: TX01-05895

Exterior conditions of the home manifested substantial heat and fire vent damage issuing out of the main entry doorway to the garage along the eastern exterior wall of the home. No other obvious fire damage was noted to the exterior portions of the structure.

All doors and windows appeared secure manifesting no obvious signs of prior forcible entry.

The garage and living portions of the home appeared well furnished with items and contents that were consistent with a residential occupancy. Evidence of prior removal of items was not found.

Evidence listed in the origin and cause caption of this report reveal burning first occurred in the left side of the engine compartment involving the brake pressure switch and associated wiring. Flames spread from this device to the adjacent brake master cylinder reservoir. This plastic container eventually was compromised causing burning brake fluid to spread over a substantial portion of the left side firewall and fender well of the vehicle. At this point in the burning, flames spread laterally across hoses, plastic moldings and other combustible material throughout the engine compartment.

Fire vent damage was noted to the front grill and left side wheel well and fender of the vehicle. Flames vented out of the left and front side, then igniting wood shelving in the western portion of the garage. Other combustible materials were ignited along the south side of the garage with eventual venting out of the garage door. Most of the garage and vehicle were involved with flames when suppression efforts of the fire department were instituted. At some point in the burning, the gasoline fuel tank of the vehicle was ruptured adding to the total fuel load and heat of this fire.

Fire vented out the top portion of the garage door caused extensive heat and fire damage to the masonry stucco siding along the eastern portion of the home extending upward to the second floor roofline. This damage was limited to the insulation materials and siding with most of the framing intact.

Careful review of the fire loss did not reveal any evidence of multiple points of origin or unexpected or unusual accelerated burn. All documented facts and circumstances are consistent with failure of the vehicle's brake pressure switch, which was the ignition source and cause for this fire.

The house was protected by a home security system provided by the Protection One Alarm Services.

It should be noted that the garage was not covered by any heat or smoke detection sensors. This circumstance allowed substantial heat and flame build up within the garage before discovery by the homeowners Irene and [REDACTED]. Protection of heat and smoke sensors in the garage could have limited property damage due to earlier detection of this fire.

Insured: [REDACTED]
UHS File No.: TX01-05893

INVESTIGATION

• Discovery

Property owner [REDACTED] stated that on the morning of the fire, she noticed a strange hissing sound, which seemed to be emanating from the kitchen area of the home. As she tried to determine the location of this strange noise, she then heard several loud thumps and booms coming from the garage. She then smelled the aroma of smoke and immediately alerted her husband [REDACTED] who was in their upstairs bedroom. [REDACTED] ran to the garage entry door and upon opening it was met with a tremendous amount of heat and smoke. He slammed the door shut and then yelled to his wife and son to get out of the home that it was on fire. They all fled the home and dialed 9-1-1 on a cell phone to report the fire.

[REDACTED] further related that the last time the vehicle was driven was on Saturday night at approximately 10:20 p.m. His wife had recently had a problem getting it out of park and the cruise control would not work. A worker from his construction business looked at the vehicle and determined that a blown fuse was the problem and replaced it. This was sometime a week before the fire and everything seemed to be in order after the blown fuse was changed.

• Fire Official

Allen Fire Department Investigator Brian Roach stated that the call for alarm was received at 10:53 a.m. on March 7, 2004. Response to the fire scene was conducted with no unusual difficulties and that no adverse weather conditions were encountered in this response. Units arrived on location approximately six minutes after the alarm reporting smoke and fire issuing from the garage of the home.

The fire was extinguished with no unusual difficulties with two pre-connected 1 1/2-inch fire hand lines. Fire damage was limited to the interior portions of the garage and exterior siding above the garage entry doorway.

Investigator Brian Roach further stated that the cause for the fire was undetermined at this time but that no intentional or criminal act is suspected.

A copy of the Allen Fire Incident Report was obtained and is included as an exhibit in this report.

COMMENTS

Pursuant to your instructions by phone, no additional work will be conducted on this assignment at this time, and our file will be placed inactive. Please call us if you have any additional questions or further assignment requests.

Insured: [REDACTED]
UIS File No.: TX01-05395

EXHIBITS

1. Property Description Sheet
2. Allen Fire Incident Report
3. Fire Scene Sign in Sheet
4. Copy of the evidence transmittal sheets page 1 & 2
5. One diagram with overlay
6. 110 color photo
7. Photograph negatives mailed under separate cover

Richard Taylor
Special Investigator
Unified Investigations & Sciences, Inc.
214-946-8989 or 808-615-4840

Insured: [REDACTED]
UIS File No.: TX01-05895

PHOTO EXPLANATION SHEET

1. North exterior portion of yard facing south towards rear of home
2. Rear dwelling enclosure
3. Rear steps and entry into the north portion of the home facing south
4. Rear portion of home facing south
5. Western rear section of home facing south
6. Pool house facing north
7. Pool house facing west
8. Western portion of home facing north
9. Eastern exterior wall showing meter box and natural gas service
10. Quartering view of photo 9
11. Northeastern exterior corner of home
12. Southeastern exterior corner of home facing northwest
13. Garage entry door facing west from driveway
14. Northern overview of garage door
15. Imposing view of northern end of garage door
16. Southern end of garage door showing heat stress along south end
17. Close up of heat stress on south upper portion of garage door
18. Apposing view of south end of garage door
19. Garage door removed and overview of entire door
20. Southern end of garage entry facing southwest
21. Southern end of garage entry doorway facing south
22. Rear overview of vehicle facing west
23. Fire damaged vehicle license plate close up
24. Southeastern corner of garage ceiling facing southwest
25. Wall view of photo 24
26. Floor view of 25
27. Southern end of garage facing west from doorway
28. Southern wall overview facing west southwest
29. Wall and floor view of southern end of garage facing west
30. Close up of southwestern corner of garage
31. Floor view of photo 30
32. Western end of ceiling and wall of garage facing west
33. West wall cabinet overview facing northwest
34. Western wall in front of vehicle facing north
35. Lower view of photo 34
36. Western cabinets along wall showing substantial charring
37. Bottom side of western cabinets showing overview and charring
38. Western cabinet duplex receptacle overview
39. Central ceiling channel of garage facing west
40. Vehicle top and western ceiling facing west
41. Northern ceiling overview of garage facing west
42. Northern portion of garage door facing northwest

Insured: [REDACTED]
ULS File No.: TX01-05895

43. Northeastern corner of garage ceiling facing northwest
44. Wall view of 43
45. Floor view of 44
46. Northern interior wall of garage facing west
47. Close up of northwestern cabinet corner of garage facing west
48. Electrical receptacle serving freezer and refrigerator along north wall
49. Garage overview of kitchen entry door
50. Kitchen entry door open showing no heat or fire damage in interior of home
51. Western wall of garage showing cabinet char and damage in front of vehicle
52. Quartering view showing front right side of vehicle facing south
53. Northern side of garage door opener
54. Eastern side of garage door opener
55. Southern overview of garage door opener
56. Western view of ceiling and wall showing fixed electrical wiring intact
57. Central ceiling of garage facing west
58. Eastern central section of garage facing southeast
59. Eastern positioned receptacle showing invasive heat damage
60. Western position light fixture wiring showing invasive heat damage
61. Top portion of light fixture in central area of garage showing invasive heat damage
62. Bottom ballast side of light fixture showing invasive heat damage
63. Southeastern corner light switch overview
64. Southeastern duplex receptacle overview
65. Central south duplex receptacle overview and exterior light switch
66. Exterior lighting wiring in southwest corner
67. Right side of front fender overview
68. Left side fender overview
69. Floor overview of southwestern floor space of garage
70. Vehicle top and central ceiling overview
71. Rear view of vehicle facing west toward front side
72. Rear loading view of photo 71
73. Right front side overview of vehicle
74. Right rear overview of vehicle
75. Left front overview of vehicle
76. Left central side overview of vehicle
77. Left rear side overview of vehicle
78. Driver's dash and steering wheel overview
79. Central dash overview
80. Right passenger's side overview of front seat
81. Central dash overview facing southwest
82. Right side overview of engine compartment
83. Close view of 82
84. Left side overview of engine block
85. Close up of left side fender well of engine compartment
86. Brake master cylinder overview
87. Close up of master cylinder remains on vacuum housing

Insured: [REDACTED]


UIS File No.: TX001-05895

88. Front radiator and air conditioning condenser coil overview
89. Rear engine block and central firewall overview
90. Firewall overview above brake master cylinder assembly
91. Left side bracket of radiator
92. Right side bracket of radiator
93. Front overview of engine block and grill
94. Rear overview of firewall
95. Brake master cylinder assembly overview
96. Close view of 95
97. Front left side of engine block showing alternator remains
98. Front of engine block overview
99. Top view of brake master cylinder and left side of the block
100. Lower frame overview of left fender well
101. Close up of brake pressure switch top housing
102. Removed brake pressure switch top assembly
103. Packaged top assembly
104. Remains of lower portion of brake pressure switch in fire debris below master cylinder assembly
105. Lower portion of brake pressure switch
106. Quartering view of lower portion of brake pressure switch
107. Left side overview of master cylinder body
108. Top view of master cylinder body
109. Cleared debris along left quadrant of vehicle
110. Both front and rear left side quadrants cleared of debris

Exhibit 1

Property Description

Insured [REDACTED] ULS No. TX01-05895
Street [REDACTED] City Allen State TX
Occupancy: ☒ Dwelling ☐ Business ☐ Unoccupied ☐ Other _____
☒ Owner occupied ☐ Tenant occupied Approximate age _____ years
Building construction: ☒ Masonry ☐ Metal ☐ Wood ☐ Other _____
Roofing construction: ☒ Composition material ☐ Metal ☐ Tile ☐ Wood
☐ Tar and gravel ☐ Other _____
Number of stories 2 Number of rooms 13 Number of baths 3 1/2
Foundation: ☐ Basement ☒ Concrete slab ☐ Pier and beam ☐ Crawl space
Heating: ☐ Electric ☒ Natural gas ☐ Propane gas ☐ Other _____
Air conditioning: ☒ Electric ☐ Natural gas ☐ Propane gas ☐ Other _____
Electrical service connected ☒ Yes ☐ No ☐ Unknown
Alarm system ☒ Yes ☐ No Type Protection One ☐ Local ☒ Monitored
Garage: ☐ None ☒ Attached ☐ Detached Approximate size 22 x 25
Outbuildings on premises ☒ Yes ☐ No ☐ Damaged ☒ Undamaged
Outside Conditions: ☒ Normal ☐ Unkept ☐ Well groomed ☐ Other _____
Building Condition: ☐ Excellent ☒ Average ☐ Poor ☐ Other _____
Fire protection: ☐ Paid ☒ Paid & Volunteer ☐ Unknown ☐ Volunteer
Department Allen Fire Department Distance to Station 1.5 miles
Completed during examination ☒ Diagram ☐ Video ☒ Photographs ☒ Measurements
Data examination began 3-8-04 Date examination completed 3-9-04



DATE: 10/01/00 09:16
TIME: 15 2004 01:53PM

DALLAS-018
HP LASERJET 3200

TEL: 2149468586

P. 001

Exhibit 2



Fax

CITY OF ALLEN FIRE DEPARTMENT
310 CENTURY PKWY, ALLEN, TEXAS 75013
(972) 727-0260 VOICE
(972) 727-0268 FAX
EMAIL: ceo@ci.allen.tx.us

TO: Richard Taylor

FAX: 214-946-8586

DEPARTMENT: _____

NUMBER OF PAGES INCLUDING COVER: 3

FROM:



CRAIG GILES, ASST FIRE CHIEF / FIRE PREVENTION



BRIAN ROACH, FIRE INVESTIGATOR

LAW ENFORCEMENT USE ONLY

COMMENTS:

FIRE REPORT 11-1000010 11-11-04 04011633

RIR -15' 04 (2004) 09:16 DALLAS-UIS
MRR 15 2004 0:52AM HP LASERJET 3200

TEL:2149460506

F.001
p.2

M11/200 8:52:56AM

Incident

FILE	DATE	TIME	STATUS	LOCATION	REMARKS
ON501	3/7/2004	10:53:39AM	4	04011631	0
Location		CROSS YR			
1		FIREST ADDRESS		315.05	
Incident Type					
110 STRUCTURE FIRE, OTHER (CONVERSION ONLY)					
Add Given Or Received					
N NONE					
Date & Time					
Alarm		3/7/2004 10:53:39AM		Shift & Alarm	
Arrival		3/7/2004 10:59:34AM		Shift 3 Alarm 1 Period 4	
Controlled				Special Remarks	
Last Unit Closed		3/7/2004 1:01:00PM		ID Value	
Actions Taken					
11 EXTINGUISH					
12 SALVAGE & OVERHAUL					
21 SEARCH					
Estimated Dollar Losses & Values					
Losses		Exposure		\$30,000.00	
		Contents		\$40,000.00	
Pre-Incident Value		Exposure		\$450,000.00	
		Contents		\$180,000.00	
Detector					
3 DETECTOR DID NOT ALERT OCCUPANTS					
Property Use					
210 001 FAMILY DWELLING					

NR - (S) 04(NOM) 09:16 DALLAS-UIS
NR 15 2004 8:52PM MP L888JET 3200

TEL:2149468516

P. 003

P. 3

Structure Type	
0	STRUCTURE TYPE OTHER
Building Height	
Number of Stories Above Grade	0
Total Number of Stories Below Grade	0
Nearest Floor Elev	
Stories First	0
Length	0 Width 0
Fire Origin	
Story of Origin	0
Below Grade	No
Fire Spread	
1 CONTINUED TO ROOM OF ORIGIN	
Number of Stories Damaged By Fire	
Stories w/ Minor Damage (1 to 25%)	0
Stories w/ Significant Damage (25 to 49%)	0
Stories w/ Heavy Damage (50 to 75%)	0
Stories w/ Extreme Damage (75 to 100%)	0
Material Contributing Most To Flame Spread	
1	
NU	
Presence of Detectors	
N NOT PRESENT	
Presence of Automatic Extinguishment System	
N NONE PRESENT	
Incident Remarks	
ALL AFD UNITS RESPONDED TO STRUCTURE FIRE AT LISTED ADDRESS. EXTINGUISHED FIRE IN FULLY INVOLVED GARAGE WITH PRE-CONNECTED SPAGHETTI LINES DUE TO RESIDENCE DISTANCE FROM STREET ACCESS. 2001 FORD EXPEDITION IN GARAGE ALSO DESTROYED BY FIRE.	
Completed By	Henry Douglas
Approved By	Henry Douglas

ERG5-005-LC-8732

3

ALLEN TEXAS

REPRESENTING

R. Taylor	Unified	Fireman's Fund Ins.
L. Helton	NISI	Ford
KEVIN MCGRAW	PRO-ONE	PRO-ONE
Ronan Young	P-1	P-1

Exhibit

4



Unified

Investigations & Sciences, Inc.

ONE OF TWO

EVIDENCE TRANSMITTAL LETTER

Insured:

UIS File: TX01-05895

STREET

ALLEN
CITYTX
STATE

Date

Of Incident: 2-7-04 Evidence Taken: 2-9-04 Evidence Submitted: 2-10-04

Evidence Taken By: R. Taylor/R. Schuler Transported By: R. Schuler

Laboratory Processing Evidence: Housed at UIS-Dallas

Evidence Received By: R. Taylor/R. Schuler 3/10/04

ID Number	Item	Location Taken From
1. 001	MASTER Brake Cylinder	FLOOR-LEFT Rear wheel of Ex. car
2. 002	Base of Brake Switch	FLOOR-LEFT Rear wheel of Ex. car
3. 003	CONNECTOR TOP OF Brake Switch	LEFT Fender well of Ex. car
4. 004	POWER STEERING RESERVOIR	LEFT side of engine block
5. 005	CRUISE CONTROL REMAINS	LEFT Fender well
6. 006	CRUISE CONTROL REMAINS	LEFT Fender well
7. 007	CIRCUIT BOARD REMAINS	LEFT fender well
8. 008	Garage door opener	Auto Tail gate
9. 009	Light Fixture	Top of Rustic
10. 010	Duplex Recept.	Control wires wall

Examination Requested:

Condition of Scene:
(clean, weathered, undisturbed, etc.)

Original Report & Invoice to:

Suzanne Atkins/Chris Woodson (214) 220-4190 (580) 564-1160

Fireman's Fund Insurance

P.O. Box 398

Medall

CITY

OK 73446

Copy of Report to:

R. Taylor/R. Schuler

c/o Unified Investigations & Sciences, Inc.

223 E. GARDEN VIEW LANE

Dallas

CITY

TX 75203

Masterfile: Original - Laboratory

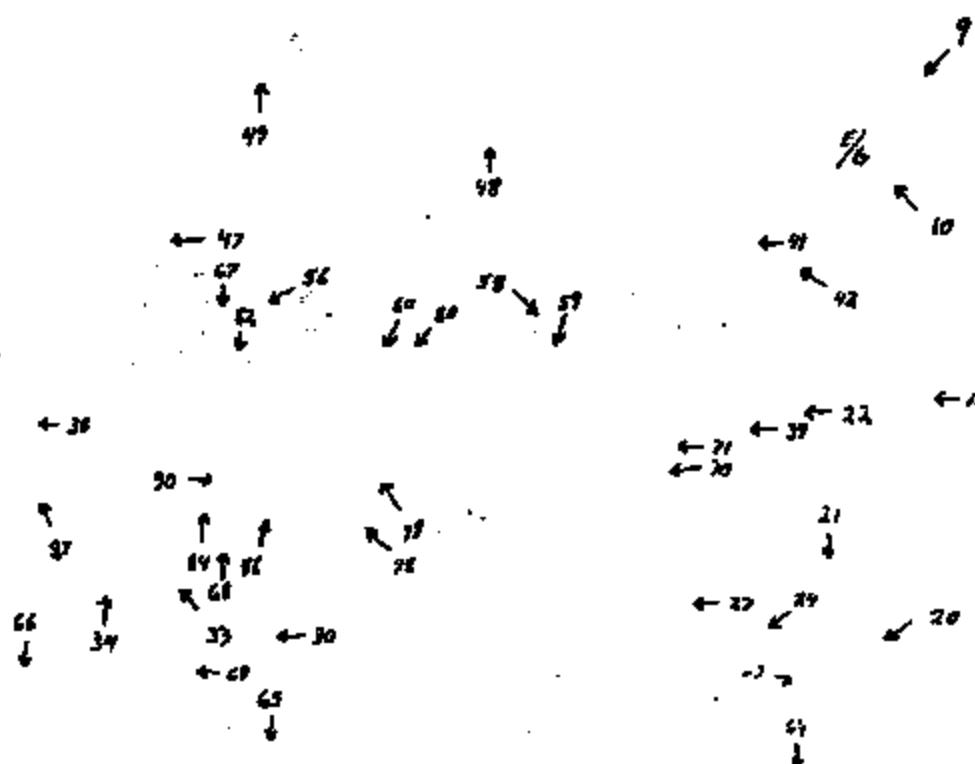
Transmit Copy - OIS Service Center

File Copy - Power Submitting Evidence

Copyright © Unified Investigations & Sciences, Inc. 1999

E005-005-LC-0734

Exhibit 5



ER05-005-LC-0736

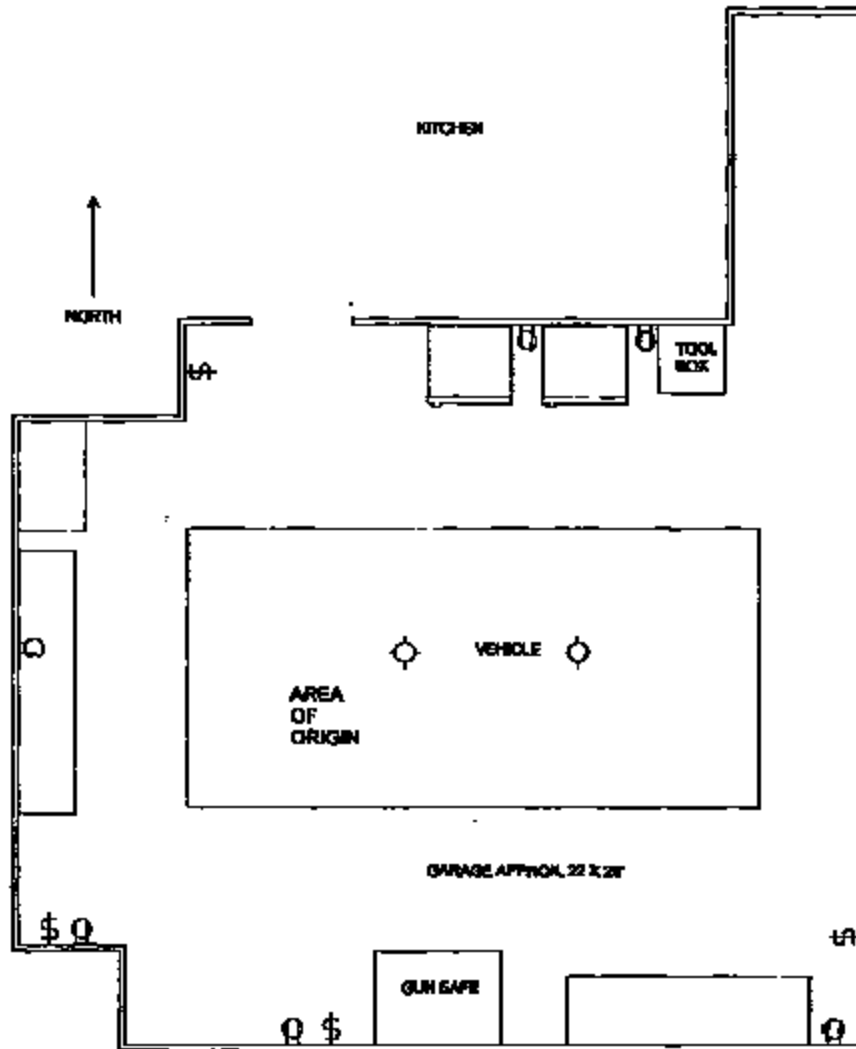
Unified Investigations & Sciences, Inc.

Name (Property Owner)

Address

File No.

TX01-05895



Prepared By

Richard Taylor

Date

Sept. 1, 2004

Scale

Not to Scale

This diagram is for illustrative purposes only and may not accurately represent the structure's dimensions, egresses, partitions or room usage.

ER05-005-LC-0737

Exhibit 6

Unified Investigations & Sciences, Inc.

IRB File # TX81-05895



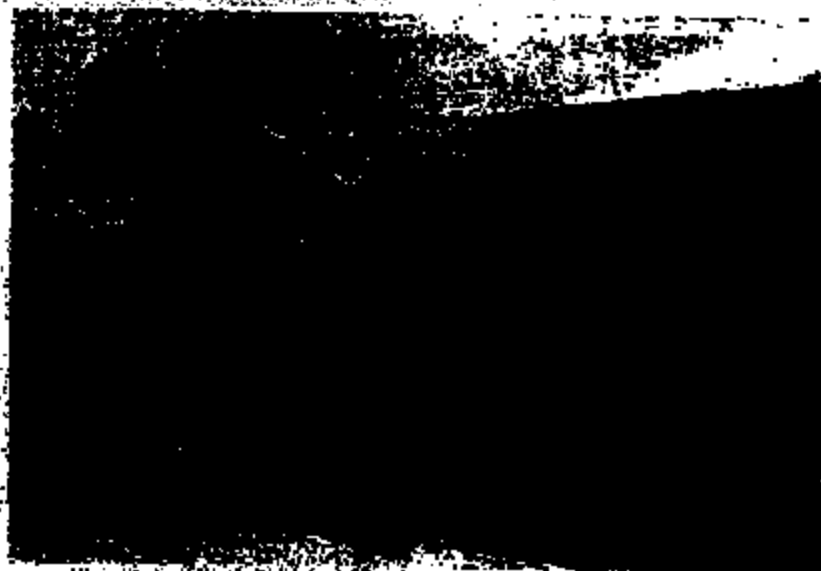
Photo # 1



Photo # 2

Unified Investigations & Sciences, Inc.

Referred to: [REDACTED] JIS File #: TX01-05095



Page 3



Page 4

Unified Investigations & Sciences, Inc.

Transmitted [REDACTED]

1018 File # TX01-05995

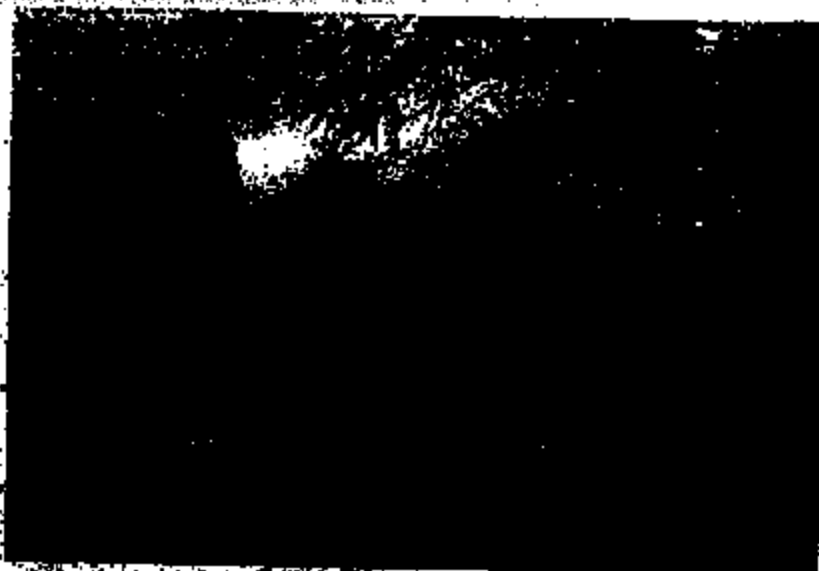


Photo 5



EA05-005-LC-0740

United Investigations & Sciences, Inc.

Insured [REDACTED] UIN No: TX01-05015



Page # 7



Unified Investigations & Sciences, Inc.

Exposed: [REDACTED]

File # TX01-05893



Photo # 9

Unified Investigations & Sciences, Inc.

Invoice: [REDACTED]

UIS File # FX01-45895



Photo # 10

Photo #

Unified Investigations & Sciences, Inc.

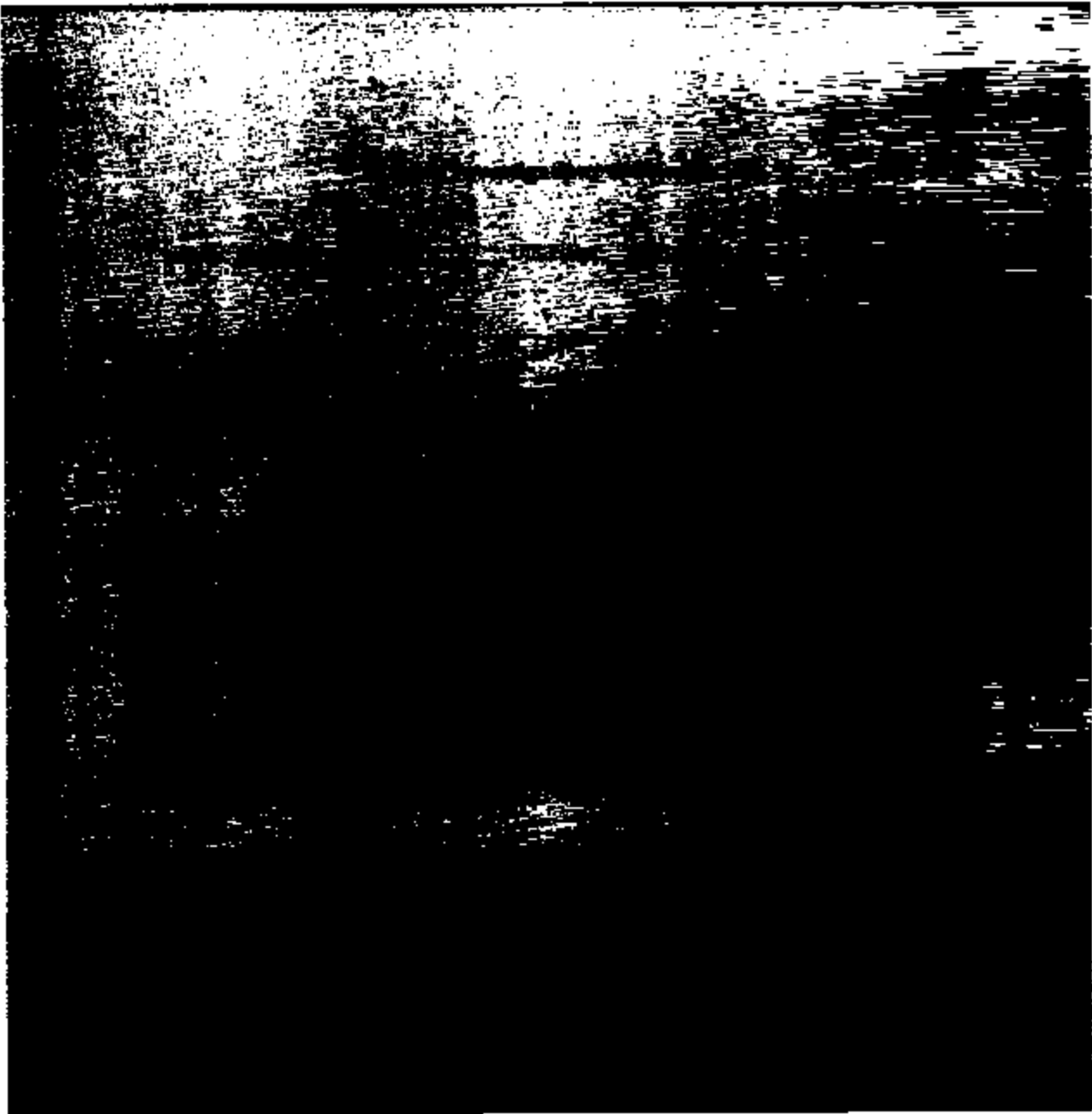
Issued: [REDACTED] UIS File #: TX01-05895



Photo # 11



Photo # 12



EA05-005-LC-0745

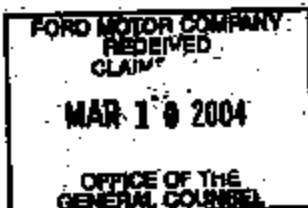
CRAIG/is Ltd.

Insurance Services

PO Box 40569 Jacksonville Florida 32203-0569
Voice 904.807.2500 Fax 904.807.2510

March 9, 2004

Ford Motor Company
Attn: Shawn Norton
3 Parklane Blvd Suite PWT300
Dearborn MI 48126



VIA FACSIMILE: 313-845-4089

IMPORTANT NOTICE

Re: FFIC Claim Number [REDACTED]
FFIC Insured [REDACTED]
Date of Loss : 3/7/2004
Type of Loss : Fire Loss
Anticipated Loss Amount : Claim adjustment still ongoing

Dear Mr. Norton:

As you are aware we represent Fireman's Fund Insurance Company ("FFIC") in pursuing subrogation recovery of any insurance funds which might be paid to FFIC's above noted insured for the above noted loss. The information we have been provided identifies you and/or your company as a party that may be responsible for causing, or contributing to the loss, and you and/or your company may be subject to subrogation.

To help you identify your involvement with this loss, please note: a fire occurred at the home of the insured, [REDACTED] Irving TX. The fire originated in the attached two car garage for the home. At the time of the fire the insured's 2001 Ford Expedition was located in the garage and was involved in the cause of the fire. The vehicle identification is: 1FMFU1AL711[REDACTED]

OF VITAL IMMEDIATE IMPORTANCE at this time is that our expert(s) need to begin the removal of the evidence from the scene so that the insured can begin the renovation of the home. You and/or your insurance carrier may wish to have an expert examine the scene as well. We wish to co-ordinate this for all concerned parties. However, this must be done immediately. Please have your carrier contact me within 48 hours to arrange for your expert inspection. If you or your carrier do(es) not immediately contact us about this matter, we will assume you do not wish to make such an inspection.

ENR03-005-LC-0746

A Passion for Process™

www.craigis.com

MAR 09 2004 13:31

CRAIG/is Ltd.

Insurance Services

PO Box 40569 Jacksonville Florida 32203-0569
Voice 904.807.2500 Fax 904.807.2510

Immediately notify your insurance carrier of this loss and potential claim against you and or your company, and have your carrier contact our office. If you do not have an insurance carrier, you and your company are put on notice of this claim. Please immediately let me know if that is the case.

Any dispute must be forwarded to our office in writing within ten (10) days of your receiving this letter.

Sincerely,

Kyle E. Fitzpatrick

Kyle E. Fitzpatrick
904-807-2736

EN08-003-10-07147

A Passion for Process™

www.craigis.com

MAR 09 2004 13:31

CRAIG/is Ltd.

Insurance Services

PO Box 40569 Jacksonville Florida 32203-0569
Voice 904.807.2500 Fax 904.807.2510

March 9, 2004

Ford Motor Company
Attn: Shawn Norton
3 Parklane Blvd Suite PWT300
Dearborn MI 48126

RECEIVED
MAR 16 2004

VIA FACSIMILE: 313-845-4089

IMPORTANT NOTICE

Re: FFIC Claim Number : [REDACTED]
FFIC Insured : [REDACTED]
Date of Loss : 3/7/2004
Type of Loss : Fire Loss
Anticipated Loss Amount : Claim adjustment still ongoing

Dear Ms. Norton:

As you are aware we represent Fireman's Fund Insurance Company ('FFIC') in pursuing subrogation recovery of any insurance funds which might be paid to FFIC's above noted insured for the above noted loss. The information we have been provided identifies you and/or your company as a party that may be responsible for causing, or contributing to the loss, and you and/or your company may be subject to subrogation.

To help you identify your involvement with this loss, please note: a fire occurred at the home of the insured, 11 Wooden Lane, Irving TX. The fire originated in the attached two car garage for the home. At the time of the fire the insured's 2001 Ford Expedition was located in the garage and was involved in the cause of the fire. The vehicle identification is: 1FMPU1AL71L [REDACTED]

OF VITAL IMMEDIATE IMPORTANCE at this time is that our expert(s) need to begin the removal of the evidence from the scene so that the insured can begin the renovation of the home. You and/or your insurance carrier may wish to have an expert examine the scene as well. We wish to co-ordinate this for all concerned parties. However, this must be done immediately. Please have your carrier contact me within 48 hours to arrange for your expert inspection. If you or your carrier do(es) not immediately contact us about this matter, we will assume you do not wish to make such an inspection

ENCLOSURE LC-0744

CRAIG/is Ltd.

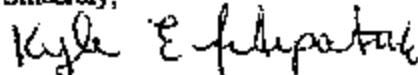
Insurance Services

PO Box 40569 Jacksonville Florida 32203-0569
Voice 904.807.2500 Fax 904.807.2510

Immediately notify your insurance carrier of this loss and potential claim against you and or your company, and have your carrier contact our office. If you do not have an insurance carrier, you and your company are put on notice of this claim. Please immediately let me know if that is the case.

Any dispute must be forwarded to our office in writing within ten (10) days of your receiving this letter.

Sincerely,



Kyle E. Fitzpatrick
904-807-2736

EN05-805-LC-8745

CRAIG/is Ltd.

Insurance Services

 PO Box 40569 Jacksonville Florida 32203-0569
 Voice 904.807.2500 Fax 904.807.2510

March 9, 2004

Ford Motor Company
 Attn: Shaven Norton
 3 Parklane Blvd Suite PWT300
 Dearborn MI 48126

VIA FACSIMILE: 313-845-4089

IMPORTANT NOTICE

Re: FFIC Claim Number : [REDACTED]
 FFIC Insured : [REDACTED]
 Date of Loss : 3/7/2004
 Type of Loss : Fire Loss
 Anticipated Loss Amount : Claim adjustment still ongoing

Dear Ms. Norton:

As you are aware we represent Fireman's Fund Insurance Company ('FFIC') in pursuing subrogation recovery of any insurance funds which might be paid to FFIC's above noted insured for the above noted loss. The information we have been provided identifies you and/or your company as a party that may be responsible for causing, or contributing to the loss, and you and/or your company may be subject to subrogation.

To help you identify your involvement with this loss, please note: a fire occurred at the home of the insured, [REDACTED]. The fire originated in the attached two car garage for the home. At the time of the fire the insured's 2001 Ford Expedition was located in the garage and was involved in the cause of the fire. The vehicle identification is: 1FMFU1AL711 [REDACTED]

OF VITAL IMMEDIATE IMPORTANCE at this time is that our expert(s) need to begin the removal of the evidence from the scene so that the insured can begin the renovation of the home. You and/or your insurance carrier may wish to have an expert examine the scene as well. We wish to co-ordinate this for all concerned parties. However, this must be done immediately. Please have your carrier contact me within 48 hours to arrange for your expert inspection. If you or your carrier do(es) not immediately contact us about this matter, we will assume you do not wish to make such an inspection.

EPO-005-LC-0750

FI
 - Trvms, TX
 - '01 Exped
 - VIN

A Passion for Process™

www.craigis.com

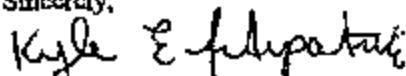
CRAIG/is Ltd.**Insurance Services**

PO Box 40559 Jacksonville Florida 32203-0559
Voice 904.807.2500 Fax 904.807.2510

Immediately notify your insurance carrier of this loss and potential claim against you and or your company, and have your carrier contact our office. If you do not have an insurance carrier, you and your company are put on notice of this claim. Please immediately let me know if that is the case.

Any dispute must be forwarded to our office in writing within ten (10) days of your receiving this letter.

Sincerely,



Kyle F. Fitzpatrick
904-807-2736

ENR03-005-LO-0751

A Passion for Process™

www.craigis.com

ChoicePoint



ChoicePoint Police Records
P.O. Box 4000
Norcross, GA 30091-4000
Phone 1.800.834.9898 Fax 1.800.834.6449
Email customerservice@choicepoint.com

#00504130465

CLIENT: 1385
DIVISION:
ADJUSTER: KHT2736
CLAIM: [REDACTED]

Report Found
Page Count 4

Transaction #: 10698393/H
Date: 03/24/2004

Your file No: 40504130465
Date of Loss: 3/27/04
Street: [REDACTED]
City: ALLEN
County: COLLIN
State: TX

Investigating Agency: ALLEN

Report Number: _____

Report Type: E - Fire-Building

Party1: [REDACTED]

Party2: _____

Car: Make: Year:
Tag: _____

Driver License: _____

Other: _____

Other2: _____

PRAC
084

3/12/200 8:52:56AM

Incident

ID# CN2981	State	Incident Date 3/7/2004 10:53:39AM	Station 4	Incident Number 04011633	Expense 0
Location 1		Damage Total 313.05			
Incident Type 110 STRUCTURE FIRE, OTHER (CONVERSION ONLY)					
Add Given Or Received N NONE					
Date & Time					
Alarm	3/7/2004 10:51:59AM	Shifts & Alarm			
Arrival	3/7/2004 10:59:34AM	Shift B	Alarm 1	District 4	
Controlled		Special Studies			
Last Unit Cleared	3/7/2004 1:01:00PM	02	Value		
Access Taken					
11 EXTINGUISH					
12 SALVAGE & OVERHAUL					
21 SEARCH					
Estimated Dollar Losses & Values					
Losses	Exempt	Exempt	Exempt	Exempt	Exempt
Pre-Incident Value	Exempt	Exempt	Exempt	Exempt	Exempt
Detector					
2 DETECTOR DID NOT ALERT OCCUPANTS					
Property Use					
419 1 OR 2 FAMILY DWELLING					

Property Details Residential Index 1 Buildings Involved 0 Areas Burned 0																									
Ignition Area Of Origin 47 VEHICLE STORAGE AREA; GARAGE, CARPORT Heat Source UU UNDETERMINED Exact Point Ignited UU UNDETERMINED Type Of Material UU UNDETERMINED Cause Of Ignition 3 CAUSE UNDER INVESTIGATION Factors Contributing To Ignition UU UNDETERMINED Human Factors Contributing To Ignition <table border="0"> <tr> <td>Asleep</td> <td>No</td> <td>Was A Factor</td> <td>No</td> </tr> <tr> <td>Possibly Impaired By Alcohol Or Drugs</td> <td>No</td> <td>Extinguished Age</td> <td></td> </tr> <tr> <td>Unattended Person</td> <td>No</td> <td>Sex</td> <td></td> </tr> <tr> <td>Possibly Mentally Disabled</td> <td>No</td> <td></td> <td></td> </tr> <tr> <td>Physically Disabled</td> <td>No</td> <td></td> <td></td> </tr> <tr> <td>Multiple Persons Involved</td> <td>No</td> <td></td> <td></td> </tr> </table>		Asleep	No	Was A Factor	No	Possibly Impaired By Alcohol Or Drugs	No	Extinguished Age		Unattended Person	No	Sex		Possibly Mentally Disabled	No			Physically Disabled	No			Multiple Persons Involved	No		
Asleep	No	Was A Factor	No																						
Possibly Impaired By Alcohol Or Drugs	No	Extinguished Age																							
Unattended Person	No	Sex																							
Possibly Mentally Disabled	No																								
Physically Disabled	No																								
Multiple Persons Involved	No																								
Fire Suppression Factors 411 DELAYED DETECTION OF FIRE																									
Mobile Property Involved Mobile Property Type & Make Property Type Property Make <table border="0"> <tr> <td>Property Model</td> <td>Property License State</td> </tr> <tr> <td>Property Year</td> <td>Property VIN</td> </tr> <tr> <td>Property License Plate</td> <td></td> </tr> </table>		Property Model	Property License State	Property Year	Property VIN	Property License Plate																			
Property Model	Property License State																								
Property Year	Property VIN																								
Property License Plate																									

Structure Type	
0	STRUCTURE TYPE, OTHER
Building Height	
Number of Stories At Or Above Grade	0
Total Number of Stories Below Grade	0
Main Floor Size	
Room Area	0
Length	0 Width 0
Fire Origin	
Story of Origin	0
Exterior Grade	No
Fire Spread	
2	CONTAINED TO ROOM OF ORIGIN
Number of Stories Damaged By Flame	
Stories w/ Minor Damage (1 to 24%)	0
Stories w/ Significant Damage (25 to 49%)	0
Stories w/ Heavy Damage (50 to 74%)	0
Stories w/ Extensive Damage (75 to 99%)	0
Material Contributing Most To Fire Spread	
1	
ULU	
Presence of Detectors	
N NOT PRESENT	
Presence of Automatic Firefighting System	
N NONE PRESENT	
Incident Remarks	
ALL AFD UNITS RESPONDED TO STRUCTURE FIRE AT LISTED ADDRESS. EXTINGUISHED FIRE IN FULLY INVOLVED GARAGE WITH FIRE-CONNECTED SPAGHETTI LINES DUE TO RESIDENCE DISTANCE FROM STREET ACCESS. 2001 FORD EXPEDITION IN GARAGE ALSO DESTROYED BY FIRE.	
Completed By	Mazzy Douglas
Approved By	Mazzy Douglas

00504130465



Unified
Investigations & Sciences, Inc.

223 E. Greenbrier Lane
Dallas, Texas 75203-1013
214-946-8989
Fax 214-946-8586

PRIVILEGED AND CONFIDENTIAL

September 3, 2004

First and Final Report

PREPARED FOR: Frewitt's Fund Insurance
C/o Cralgia Limited
225 Water Street, Suite 1600
Jacksonville, Florida 32022

ATTENTION: Mr. Kyle Fitzpatrick/Kevin Vandecolk

INSURED: [REDACTED]

DATE OF LOSS: March 7, 2004

LOSS LOCATION: [REDACTED] Allen, Texas

POLICY NUMBER: Not Specified

CLAIM NUMBER: [REDACTED]

UIS FILE NUMBER: TX01-05895

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

EA05-005-LC-0756

Insured: [REDACTED]
UIS File No.: TX01-05495

ASSIGNMENT

The assignment was received March 8, 2004, and the investigation commenced this same date. Instructions were to conduct an origin and cause investigation. This assignment was expanded to include UIS Mechanical Engineer Richard Schultz in review and assessment of the fire loss site.

DETERMINATION OF ORIGIN AND CAUSE

This fire was accidental in nature. Burning first occurred in the vicinity of the master brake cylinder housing located in the left side portion of the engine compartment. The cause was due to overheating and failure of the brake pressure switch of the brake master cylinder assembly.

Information and factors available to establish origin:

1. Area of greatest fire damage
2. Patterns of flame spread
3. Area of lowest burn

Information and factors available to establish cause:

1. Single area of origin
2. No unusual accelerated burn
3. Focused heat damage to brake master cylinder assembly
4. No other heat or ignition source found

Property owners [REDACTED] were present at the fire loss site during the initial portions of this examination. UIS Engineer Richard Schultz assisted in the completion of this review. A subsequent review of the fire scene was conducted by Mr. Larry Helton of Newell Investigative Services, Inc. based out of Gainesville, GA. He was present representing the interests of the Ford Motor Company. Commercial Installation Manager Eric Young and Associate Council Kevin McGraw attended this subsequent exam representing the interests of Protection One Alarm Systems.

The structure involved in this fire loss was a two-story, wood frame and stucco siding home having a composition roof and a slab foundation with the main entrance facing in a southerly direction. The home was located on the north side of the cul-de-sac ending to the east/west running roadway.

No adverse conditions were encountered during this exam, and a thorough review of the fire loss was conducted. Alterations to the fire scene consisted of minor overhaul of debris in the south central garage area with the main door pulled down off of the mounting brackets. This damage was conducted during suppression duties of fire personnel.

Insured: [REDACTED]
ULIS File No.: TX01-05895

Exterior conditions of the home manifested substantial heat and fire vent damage issuing out of the main entry doorway to the garage along the eastern exterior wall of the home. No other obvious fire damage was noted to the exterior portions of the structure.

All doors and windows appeared secure manifesting no obvious signs of prior forcible entry.

The garage and living portions of the home appeared well furnished with items and contents that were consistent with a residential occupancy. Evidence of prior removal of items was not found.

Evidence listed in the origin and cause caption of this report reveal burning first occurred in the left side of the engine compartment involving the brake pressure switch and associated wiring. Flames spread from this device to the adjacent brake master cylinder reservoir. This plastic container eventually was compromised causing burning brake fluid to spread over a substantial portion of the left side firewall and fender well of the vehicle. At this point in the burning, flames spread laterally across hoses, plastic moldings and other combustible material throughout the engine compartment.

Fire vent damage was noted to the front grill and left side wheel well and fender of the vehicle. Flames vented out of the left and front side, then igniting wood shelving in the western portion of the garage. Other combustible materials were ignited along the south side of the garage with eventual venting out of the garage door. Most of the garage and vehicle were involved with flames when suppression efforts of the fire department were instituted. At some point in the burning, the gasoline fuel tank of the vehicle was ruptured adding to the total fuel load and burn of this fire.

Fire vented out the top portion of the garage door caused extensive heat and fire damage to the masonry stucco siding along the eastern portion of the home extending upward to the second floor roofline. This damage was limited to the insulation materials and siding with most of the framing intact.

Careful review of the fire loss did not reveal any evidence of multiple points of origin or unexpected or unusual accelerated burn. All documented facts and circumstances are consistent with failure of the vehicle's brake pressure switch, which was the ignition source and cause for this fire.

The house was protected by a home security system provided by the Protection One Alarm Services.

It should be noted that the garage was not covered by any heat or smoke detection sensors. This circumstance allowed substantial heat and flame build up within the garage before discovery by the homeowners [REDACTED]. Protection of heat and smoke sensors in the garage could have limited property damage due to earlier detection of this fire.

Insured: [REDACTED]
UIS File No.: TX01-05895

INVESTIGATION

• Discovery

Property owner [REDACTED] stated that on the morning of the fire, she noticed a strange hissing sound, which seemed to be emanating from the kitchen area of the house. As she tried to determine the location of this strange noise, she then heard several loud thumps and booms coming from the garage. She then smelled the aroma of smoke and immediately alerted her husband [REDACTED] who was in their upstairs bedroom. [REDACTED] ran to the garage entry door and upon opening it was met with a tremendous amount of heat and smoke. He slammed the door shut and then yelled to his wife and son to get out of the house that it was on fire. They all fled the home and dialed 9-1-1 on a cell phone to report the fire.

[REDACTED] further related that the last time the vehicle was driven was on Saturday night at approximately 10:20 p.m. His wife had recently had a problem getting it out of park and the cruise control would not work. A worker from his construction business looked at the vehicle and determined that a blown fuse was the problem and replaced it. This was sometime a week before the fire and everything seemed to be in order after the blown fuse was changed.

• Fire Officials

Allen Fire Department Investigator Brian Roach stated that the call for alarm was received at 10:53 a.m. on March 7, 2004. Response to the fire scene was conducted with no unusual difficulties and that no adverse weather conditions were encountered in this response. Units arrived on location approximately six minutes after the alarm reporting smoke and fire issuing from the garage of the home.

The fire was extinguished with no unusual difficulties with two pre-connected 1½-inch fire hand lines. Fire damage was limited to the interior portions of the garage and exterior siding above the garage entry doorway.

Investigator Brian Roach further stated that the cause for the fire was undetermined at this time but that no intentional or criminal act is suspected.

A copy of the Allen Fire Incident Report was obtained and is included as an exhibit in this report.

COMMENTS

Pursuant to your instructions by phone, no additional work will be conducted on this assignment at this time, and our file will be placed inactive. Please call us if you have any additional questions or further assignment requests.

Insured: [REDACTED]
UIS File No.: TX01-05895

EXHIBITS

1. Property Description Sheet
2. Allen Fire Incident Report
3. Fire Scene Sign in Sheet
4. Copy of the evidence transmittal sheets page 1 & 2
5. One diagram with overlay
6. 110 color photo
7. Photograph negatives mailed under separate cover

Richard Taylor
Special Investigator
United Investigations & Sciences, Inc.
214-946-3989 or 800-613-4840

Insured: [REDACTED]
UIS File No.: TX01-05895

PHOTO EXPLANATION SHEET

1. North exterior portion of yard facing south towards rear of home
2. Rear dwelling enclosure
3. Rear steps and entry into the north portion of the home facing south
4. Rear portion of home facing south
5. Western rear section of home facing south
6. Pool house facing north
7. Pool house facing west
8. Western portion of home facing north
9. Eastern exterior wall showing meter box and natural gas service
10. Quartering view of photo 9
11. Northeastern exterior corner of home
12. Southeastern exterior corner of home facing northwest
13. Garage entry door facing west from driveway
14. Northern overview of garage door
15. Imposing view of northern end of garage door
16. Southern end of garage door showing heat stress along south end
17. Close up of heat stress on south upper portion of garage door
18. Apposing view of south end of garage door
19. Garage door removed and overview of entire door
20. Southern end of garage entry facing southwest
21. Southern end of garage entry doorway facing south
22. Rear overview of vehicle facing west
23. Fire damaged vehicle license plate close up
24. Southeastern corner of garage ceiling facing southwest
25. Wall view of photo 24
26. Floor view of 25
27. Southern end of garage facing west from doorway
28. Southern wall overview facing west southwest
29. Wall and floor view of southern end of garage facing west
30. Close up of southwestern corner of garage
31. Floor view of photo 30
32. Western end of ceiling and wall of garage facing west
33. West wall cabinet overview facing northwest
34. Western wall in front of vehicle facing north
35. Lower view of photo 34
36. Western cabinets along wall showing substantial charring
37. Bottom side of western cabinets showing overview and charring
38. Western cabinet duplex receptacle overview
39. Central ceiling channel of garage facing west
40. Vehicle top and western ceiling facing west
41. Northern ceiling overview of garage facing west
42. Northern portion of garage door facing southwest

Insured: [REDACTED]

ULS File No.: TX01-05895

43. Northeastern corner of garage ceiling facing northwest
44. Wall view of 43
45. Floor view of 44
46. Northern interior wall of garage facing west
47. Close up of northwestern cabinet corner of garage facing west
48. Electrical receptacle serving freezer and refrigerator along north wall
49. Garage overview of kitchen entry door
50. Kitchen entry door open showing no heat or fire damage in interior of house
51. Western wall of garage showing cabinet char and damage in front of vehicle
52. Quartering view showing front right side of vehicle facing south
53. Northern side of garage door opener
54. Eastern side of garage door opener
55. Southern overview of garage door opener
56. Western view of ceiling and wall showing fixed electrical wiring intact
57. Central ceiling of garage facing west
58. Eastern central section of garage facing southeast
59. Eastern positioned receptacle showing invasive heat damage
60. Western position light fixture wiring showing invasive heat damage
61. Top portion of light fixture in central area of garage showing invasive heat damage
62. Bottom ballast side of light fixture showing invasive heat damage
63. Southeastern corner light switch overview
64. Southeastern duplex receptacle overview
65. Central south duplex receptacle overview and exterior light switch
66. Exterior lighting wiring in southwest corner
67. Right side of front fender overview
68. Left side fender overview
69. Floor overview of southwestern floor space of garage
70. Vehicle top and central ceiling overview
71. Rear view of vehicle facing west toward front side
72. Rear loading view of photo 71
73. Right front side overview of vehicle
74. Right rear overview of vehicle
75. Left front overview of vehicle
76. Left central side overview of vehicle
77. Left rear side overview of vehicle
78. Driver's dash and steering wheel overview
79. Central dash overview
80. Right passenger's side overview of front seat
81. Central dash overview facing southwest
82. Right side overview of engine compartment
83. Closer view of 82
84. Left side overview of engine block
85. Close up of left side fender well of engine compartment
86. Brake master cylinder overview
87. Close up of master cylinder remains on vacuum housing

Insured: [REDACTED]

ULS File No.: 12001-05195

88. Front radiator and air conditioning condenser coil overview
89. Rear engine block and central firewall overview
90. Firewall overview above brake master cylinder assembly
91. Left side bracket of radiator
92. Right side bracket of radiator
93. Front overview of engine block and grill
94. Rear overview of firewall
95. Brake master cylinder assembly overview
96. Closer view of 95
97. Front left side of engine block showing alternator remains
98. Front of engine block overview
99. Top view of brake master cylinder and left side of the block
100. Lower frame overview of left fender well
101. Close up of brake pressure switch top housing
102. Removed brake pressure switch top assembly
103. Packaged top assembly
104. Remains of lower portion of brake pressure switch in fire debris below master cylinder assembly
105. Lower portion of brake pressure switch
106. Quartering view of lower portion of brake pressure switch
107. Left side overview of master cylinder body
108. Top view of master cylinder body
109. Cleared debris along left quadrant of vehicle
110. Both front and rear left side quadrants cleared of debris

Property Description

Insured [REDACTED] LITE No. TX01-05875
 Street [REDACTED] City ALLEN State TX
 Occupancy: ☒ Dwelling ☐ Business ☐ Unoccupied ☐ Other _____
☒ Owner occupied ☐ Tenant occupied Approximate age _____ years
 Building construction: ☒ Masonry ☐ Metal ☐ Wood ☐ Other _____
 Roofing construction: ☒ Composition material ☐ Metal ☐ Tile ☐ Wood
☐ Tar and gravel ☐ Other _____
 Number of stories 2 Number of rooms 13 Number of baths 3 1/2
 Foundation: ☐ Basement ☒ Concrete slab ☐ Pier and beam ☐ Crawl space
 Heating: ☐ Electric ☒ Natural gas ☐ Propane gas ☐ Other _____
 Air conditioning: ☒ Electric ☐ Natural gas ☐ Propane gas ☐ Other _____
 Electrical service conducted ☒ Yes ☐ No ☐ Unknown
 Alarm system: ☒ Yes ☐ No Type PROTECTION ONE ☐ Local ☒ Monitored
 Garage: ☐ None ☒ Attached ☐ Detached Approximate size 22 x 26
 Outbuildings on premises ☒ Yes ☐ No ☐ Damaged ☒ Undamaged
 Outside Condition: ☒ Normal ☐ Unkempt ☐ Well groomed ☐ Other _____
 Building Condition: ☐ Excellent ☒ Average ☐ Poor ☐ Other _____
 Fire protection: ☐ Paid ☒ Paid & Volunteer ☐ Unknown ☐ Volunteer
 Department ALLEN FIRE DEPARTMENT Distance to Station 1.5 miles
 Completed during examination ☒ Diagram ☐ Video ☒ Photographs ☒ Measurements
 Date examination began 3-8-04 Date examination completed 3-8-04



NAL -15 81 (NOX) 09:16
MAR 15 2004 0:32PM

DALLAS-019
HP LASERJET 3800

TEL: 214-946-8516

P. 001

Exhibit 2



Fax

CITY OF ALLEN FIRE DEPARTMENT
310 CENTURY PKWY, ALLEN, TEXAS 75013
(972) 727-8268 VOICE
(972) 727-8266 FAX
EMAIL: caa@ci.allen.tx.us

TO: Richard Taylor

FAX: 314-946-8586

DEPARTMENT:

NUMBER OF PAGES INCLUDING COVER: 3

FROM:



CRAIG GILLIS, ASST FIRE CHIEF / FIRE PREVENTION



BRIAN BOACH, FIRE INVESTIGATOR

LAW ENFORCEMENT USE ONLY

COMMENTS: FIRE REPORT

W. # 0401633

NR -LS 0400H 09:16 DALLAS-UIS
NR 18 2004 0152HH HP LHRJET 2200

TEL:2149468586

P.02

P.2

3/7/2004 1:52:56AM

Incident

FD-101	NR	3/7/2004	10:13:36AM	4	0001101	2000175	0
CN301							
Location		COUNTY NAME					
1		STREET ADDRESS					
		119.00					
Incident Type							
110 STRUCTURE FIRE, OTHER (CONVERSION ONLY)							
All Given Or Received							
N NONE							
Dates & Times							
Alarm	3/7/2004	10:53:38AM	SCNs & Alarms	Alarm 1	Cancel 4		
Arrival	3/7/2004	10:59:44AM	RMID	2			
Completed			Special Studies				
Lab Work Cleared	3/7/2004	1:01:00PM	IQ	Value			
Actions Taken							
11 EXTINGUISH							
12 SALVAGE & OVERHAUL							
21 SEARCH							
Estimated Dollar Losses & Values							
Losses	Property	350,000.00					
	Contents	\$40,000.00					
Estimated Value	Property	\$400,000.00					
	Contents	\$100,000.00					
Detector							
2 DETECTOR DID NOT ALERT OCCUPANTS							
Property Use							
419 1 OR 2 FAMILY DWELLING							

MAR -15' 04' 00H 09:16 00045-013
MAR 15 2004 0:58PM HP LASERJET 3200

TEL: 2149466586

P. 003

P. 3

Structure Type	
0	STRUCTURE TYPE, OTHER
Building Height	
Number of Stories Above Ground	0
Total Number of Stories Below Ground	0
Alarm Floor Size	
Alarm Floor	0
Length	0 Width 0
FRT Origin	
Story of Origin	0
Below Grade	No
Fire Spread	
2	CONFINED TO ROOM OF ORIGIN
Number of Stories Damaged By Fire	
Stories w/ Minor Damage (1 to 25%)	0
Stories w/ Significant Damage (26 to 49%)	0
Stories w/ Heavy Damage (50 to 74%)	0
Stories w/ Extreme Damage (75 to 100%)	0
Material Contributing Most To Fire Spread	
1	ULU
Presence of Debris	
N	NOT PRESENT
Presence of Automatic Extinguishment System	
N	NOT PRESENT
Incident Summary:	
ALL AFD UNITS RESPONDED TO STRUCTURE FIRE AT LISTED ADDRESS. EXTINGUISHED FIRE IN FULLY INVOLVED GARAGE WITH PRE-CONNECTED SEAGHETTI LINES DUE TO PROXIMITY DISTANCE FROM STREET ACCESS. 1001 ROAD EXISTENCE IN GARAGE ALSO DESTROYED BY FIRE.	
Completed By	Murray Douglas
Approved By	Murray Douglas

3

MARCH 16, 2004

ALLEN TEXAS

REPRESENTING

R. Taylor	Unified	Fireman's Fund Ins.
L. Helton	NISI	Ford
KEVIN. MCGRAW	PRO-ONE	PRO-ONE
Alan Young	P-1	P-1

Exhibit 4**Unified**

Investigations & Sciences, Inc.

ONE OF TWO**EVIDENCE TRANSMITTAL LETTER**

Insured: [REDACTED] U.S. File: TXCI-05895
 STREET: [REDACTED] CITY: ALLEN STATE: TX
 Date Of Incident: 2-7-04 Evidence Taken: 2-9-04 Evidence Submitted: 2-10-04
 Evidence Taken By: R. Taylor / R. Schulze Transported By: R. Schulze
 Laboratory Processing Evidence: Held at UTS-Dallas
 Evidence Received By: [REDACTED] 2/10/04

ID Number	Item	Location Taken From
1. <u>001</u>	MASTER Brake cylinder	FLOOR - LEFT Rear quad. of Eng. car
2. <u>002</u>	Base of Brake switch	FLOOR - LEFT Rear quad. of Eng. car
3. <u>003</u>	COMPARTMENT DI. Brake switch	LEFT Fender wall of Eng. car
4. <u>004</u>	Power Steering Reservoir	LEFT Side of Engine Block
5. <u>005</u>	CRUISE Control Assembly	LEFT Fender wall
6. <u>006</u>	CRUISE Control Assembly	LEFT Fender wall
7. <u>107</u>	CIRCUIT BOARD Assembly	LEFT Fender wall
8. <u>008</u>	GASOLINE FLOOR COVER	AUTO Tail gate
9. <u>009</u>	Light Fixture	Top of AUTO
10. <u>010</u>	Duplex Receipt	Control wall

Examination Requested: _____

 Condition of Scene:
 (draw, photograph, videotape, etc.)

Original Report & Invoice to:

SUZANNE ATKINS / Chris Warden (214) 220-4190
Fireman's Fund Insurance (580) 564-1100

P.O. Box 398
Medall
OK 73456
00504130465
CLAIM NUMBER
Copy of Report to: R. Taylor / R. Schulze c/o Unified Investigations & Sciences, Inc.
223 E. LAMPSON Lane
Dallas TX 75203

Distribution: Original - Laboratory

Yellow Copy - UTS Service Center

Pink Copy - Police Submitting Evidence

©Copyright Unified Investigations & Sciences, Inc. 07/03



Unified

Investigations & Sciences, Inc.

TWO OF TWO

INITIAL LETTER

Insured: [REDACTED] U.S. FRANK: TX01-05895
 STREET: [REDACTED] CITY: Allen STATE: TX
 Date Of Incident: 9-7-04 Evidence Taken: 9-9-04 Evidence Submitted: 9-10-04
 Evidence Taken By: R. Taylor / R. Schulte Transported By: R. Schulte
 Laboratory Processing Evidence: Hold at URS: Dallas
 Evidence Received By: Chris Wooden 3/10/04

ID Number	Item	Location Taken From
1. <u>011</u>	<u>Switch Assembly</u>	<u>SW. PLANK OF GARAGE</u>
2. <u>012</u>	<u>Duplex Recept.</u>	<u>S. CENTRAL WALL</u>
3. <u>013</u>	<u>Dobie - Neg. Chase Cont</u>	<u>LEFT Fender well</u>
4. <u>014</u>	<u>FLOOR debris</u>	<u>LEFT Rear quad. of Eng Comp.</u>
5. <u>015</u>	<u>FLOOR debris</u>	<u>LEFT FRONT quad of Eng Comp.</u>
6. <u>016</u>	<u>FLOOR debris</u>	<u>LEFT Rear quad of Eng Comp.</u>
7. <u>017</u>	<u>FLOOR debris</u>	<u>CONT. RIGHT FLOOR</u>
8. _____	_____	_____
9. _____	_____	_____
10. _____	_____	_____

Examination Requested: _____

Condition of Scene: _____
 (clean, wet, dry, etc.)

Original Report & Invoice to:

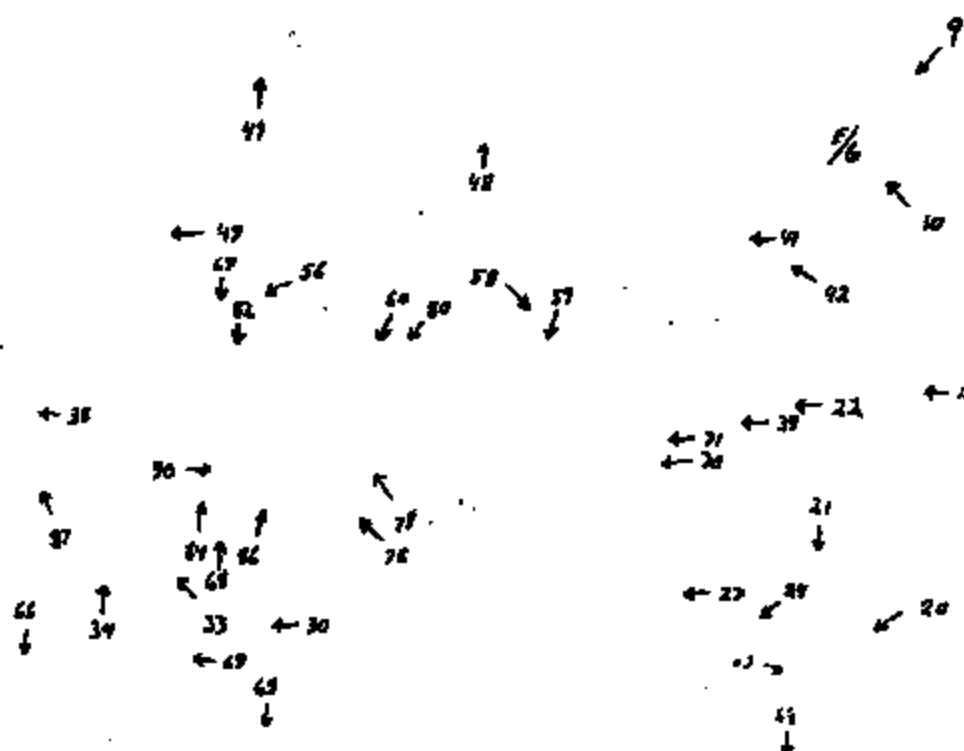
Suzanne Atkins / Chris Wooden (214) 220-4190
FIREMAN'S Fund Insurance (580) 564-1160
P.O. Box 398
Medall OK 73446
00504130465

Copy of Report to: R. Taylor / R. Schulte c/o Unified Investigations & Sciences, Inc.
723 E. GREENGLADE LANE
Dallas TX 75203

Distribution: Original - Laboratory Yellow Copy - URS Service Center Pink Copy - Person Submitting Evidence

©Copyright Unified Investigations & Sciences, Inc. 9/2003

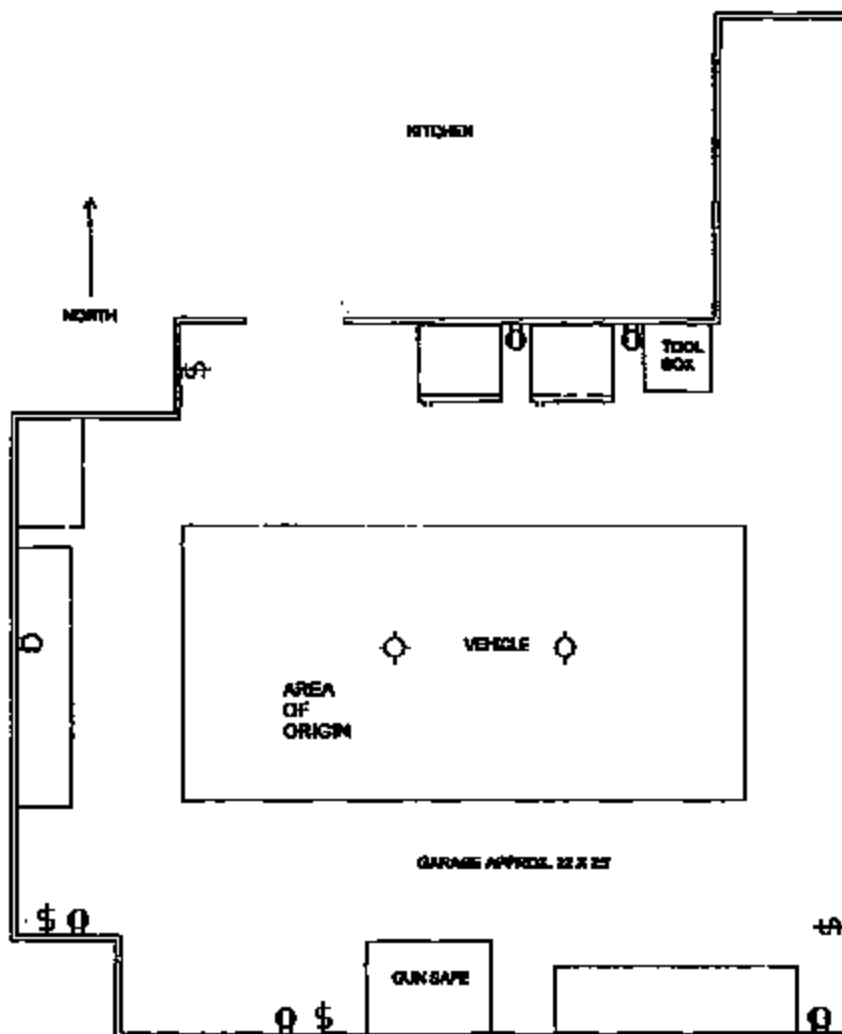
Exhibit 5



ENCLOSURE-225-LC-0771

Unified Investigations & Sciences, Inc.

Name (Property Owner)	Address	File No.
[REDACTED]	Allen, TX.	TX01-05895



Prepared By	Date	Scale
Richard Taylor	Sept. 1, 2004	Not to Scale

This diagram is for illustrative purposes only and may not accurately represent the structure's dimensions, entrances, partitions or room usage.

Exhibit 6

United Insurance & Securities, Inc.

Witness: Hal Shaw

April 10, 1977



Photo 1 /



Photo 2 /

ER25-285-LC-8773

Central Investigations & Sciences, Inc.

Case #

Date

LAO 8892



Photo 1



Photo 2

United Investigations & Sciences, Inc.

██████████ EXHIBIT



Photo A



Photo B

ERG5-865-LC-6775

United Fire Insurance & Securities, Inc.

Exhibit A

Exhibit B



Photo A



Photo B

United Investigations & Service, Inc.

to Mr. J. [REDACTED]

ENCL. 10/20/55



Page 1

Page 2

United Insurance & Sciences, Inc.

to be

EXHIBIT 1



Photo 1

Photo 2

United Producers & Suppliers, Inc.

EXHIBIT

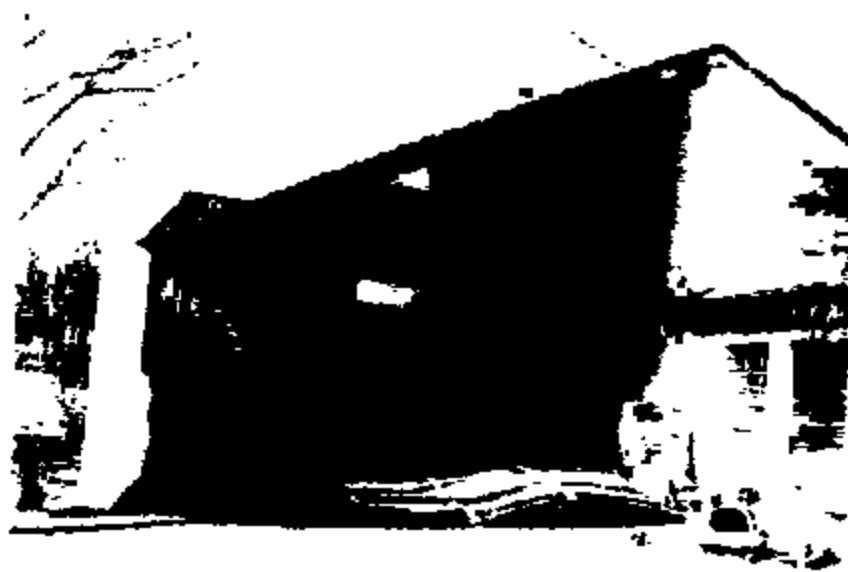


Photo 1



Photo 2

Exhibit [redacted] A-S-100-100

[redacted] 1/10/1980



Photo 1



Photo 2

United Investigations & Services, Inc.

Case of [REDACTED]

LAB 10075



Photo 1



Photo 2

United Investigations & Services, Inc.

EXHIBIT



Photo 1



Photo 2

United Investigations & Services, Inc.

Exhibit

EXHIBIT 05905



Photo 1



Photo 2

ENCLOSURE LC-8784

United Investigations & Services, Inc.

Case # [REDACTED] File # 140-000000



Photo 1



Photo 2

United Technology & Sciences, Inc.

CONFIDENTIAL

EXHIBIT 9-295



Photo 1



Photo 2

United Investigations & Services, Inc.

Case #



File # 100-100000



Photo 1



Photo 2

United Investigations & Sciences, Inc.

Report of [REDACTED] on [REDACTED] EXHIBIT 95



Photo # 1



Photo # 2

United Investigations & Services, Inc.

Investigator



Date

EXHIBITS



Photo - 1



Photo - 2

Unified Investigations & Sciences, Inc.

Page 1

1/10/1988



Figure 1



Figure 2

Confidential Investigation & Services, Inc.

000000

EX-100-000000

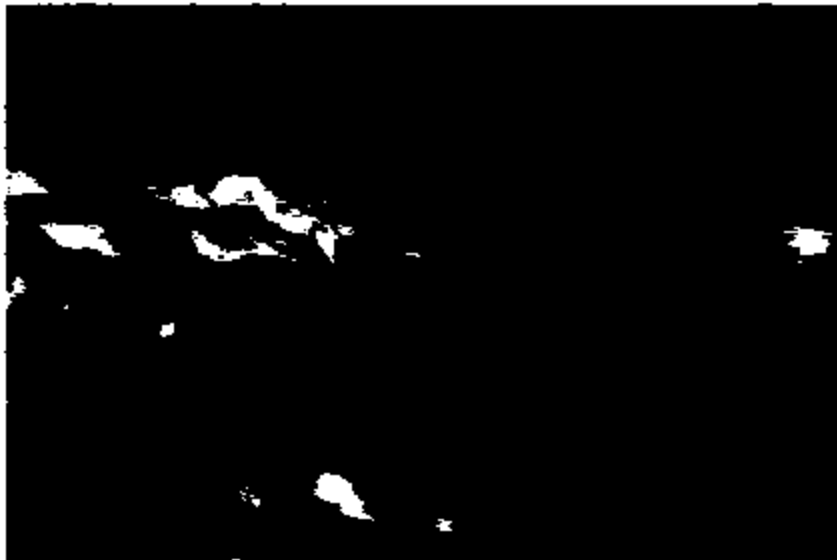


Photo 1



Photo 2

United Investigations & Services, Inc.

to [REDACTED]

on 11/11/88

11/11/88



Photo 1

Photo 2

United Investigations & Services, Inc.

EXHIBIT



Photo A



Photo B

Unified Investigation & Services, Inc.

Report of



on

EXHIBIT



Photo # 1



Photo # 2

ER25-685-LC-8785

United Technologies & Sciences, Inc.

Isaiah 1

CALL 05871



Photo # 127

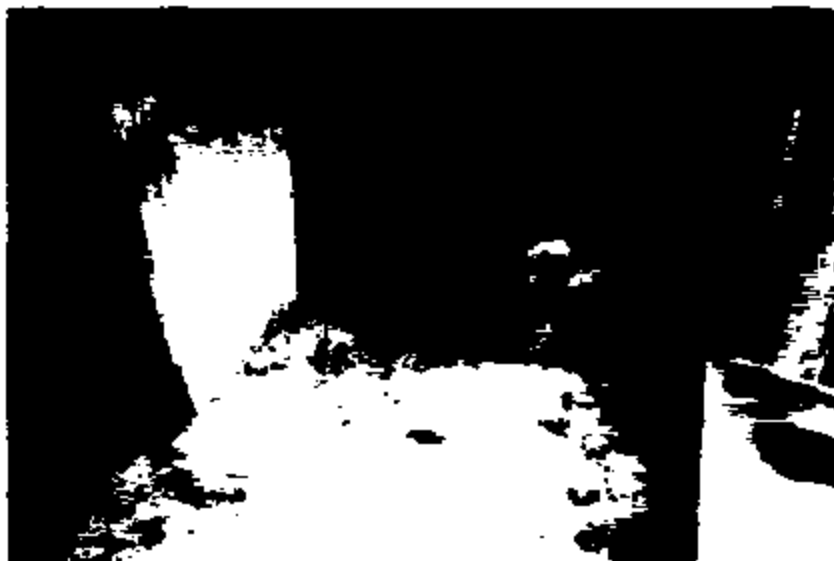


Photo # 128

United Investigations & Security, Inc.

Photo 1

UNIT 05075



Photo 1



Photo 2

United Investigations & Security, Inc.

Exhibit



Exhibit 10000



Photo 1

Photo 2

United Insurance Group & Securities, Inc.

to agent

EXHIBITS



Photo 2

Photo 3

United Investigations & Sciences, Inc.

RE: [REDACTED]

EXHIBIT 10575



Photo # 10575

Photo # 10575

EROS-005-LC-6800

United States of America & Science - Inc.

Page 1

1001-1000



Photo 1



Photo 2

United Investigations & Security, Inc.

██████████ 12-15-85 1501-8585



Photo 1 of 2



Photo 2 of 2

United Insurance & Services, Inc.

100-100000

EX-100000



Photo 1



Photo 2

United Technologies & Services, Inc.

Page 2

Page 2



Photo # 2



Photo # 3

Confidential Investigations & Security, Inc.

FAIR REPORT



Photo 1



Photo 2

United States Department of Justice

100-100000

100-100000



Photo 1



Photo 2

Confidential Investigations & Security, Inc.

[REDACTED]

CADD: [REDACTED]



Photo # [REDACTED]

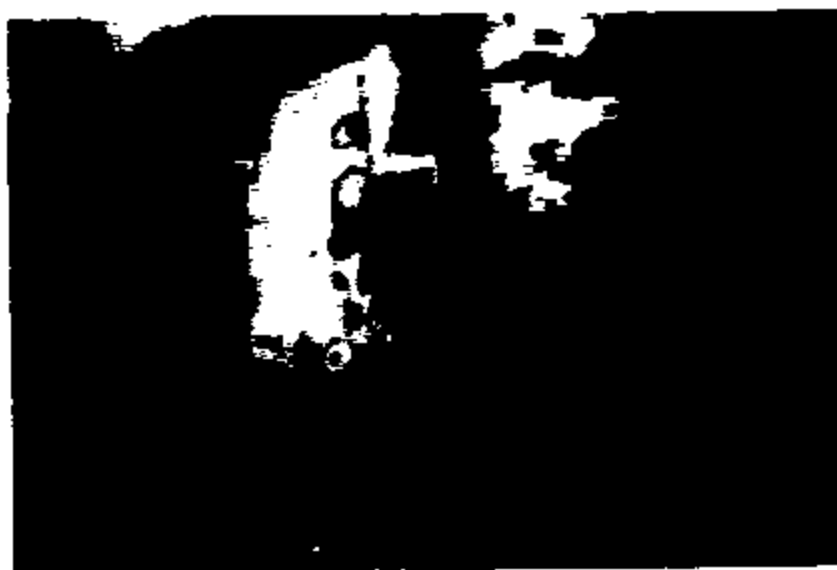


Photo # [REDACTED]

E985-005-LC-8887

United Overseas Bank & Finance, Inc.

Address



Telephone



Photo

Photo

United Investigations & Services, Inc.

0000



0000

EX-100-200



Photo 1

Photo 2

Federal Investigations & Sciences, Inc.

EX-105895



Figure 1



Figure 2

United Therapeutics & Sciences, Inc.

United

UNR 05015



Photo # 1



Photo # 2

United Investigation & Services, Inc.

Code: [REDACTED]

Case: 95-008



Photo 1



Photo 2

95-008-LC-0012

United Investigations & Research, Inc.

Source: [REDACTED]

File # [REDACTED] (X-100-45895)



Photo 1 [REDACTED]



Photo 2 [REDACTED]

United States Department of Justice

Page 2

1964-1965



Photo 1



Photo 2

2005-005-LC-0014

United Investigations & Security, Inc.

Re: [REDACTED]

CP

EXHIBIT 1000



Photo 1



Photo 2

United Investigations & Security, Inc.

to be of

EXHIBIT 6-292



Photo # 1



Photo # 2

EXHIBIT 6-292

United Investigations & Science, Inc.

Report #



Case # 83015



Photo 1

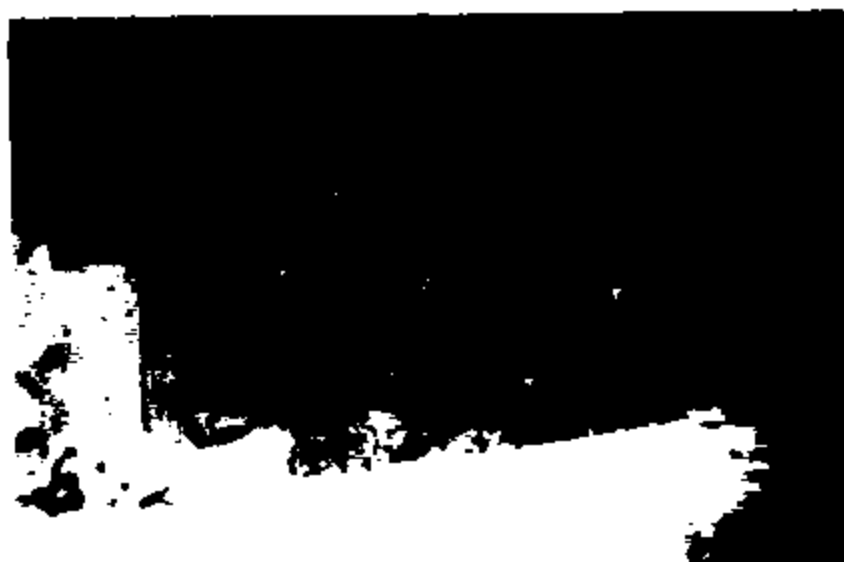


Photo 2

United Investigations & Services, Inc.

Re: [REDACTED]

EXHIBIT

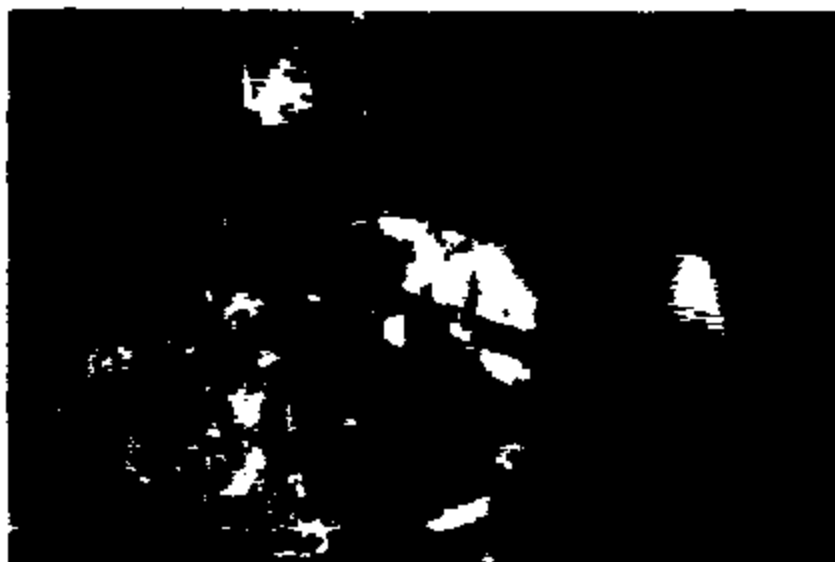


Photo - 1



Photo - 2

Case 1:17-cr-00069 Document 1 Filed 08/01/17 Page 1 of 1



References



Figure 1

2025-045-LC-0015

Furth, Inc. & Sciences, Inc.

to be

EX-100



Photo - 1



Photo - 2

EROS-005-LC-0020

United Laboratories & Sciences, Inc.

SECTION



FILE

CLASSIFIED



Photo 1



Photo 2

Federal Investigation & Services, Inc.

MEMORANDUM

(X-1 8502)



Photo 1 /



Photo 2 /

Faculty of Engineering & Science - Inc.

Page [REDACTED]

EXHIBIT



Photo 1 of 2



Photo 2 of 2

United Fruit Company X-Ray - 40

100

1000000



Photo - 1



Photo - 2

United Investigations & Sciences, Inc.

Case # [REDACTED]

File # 1401 R5689



Photo # 1

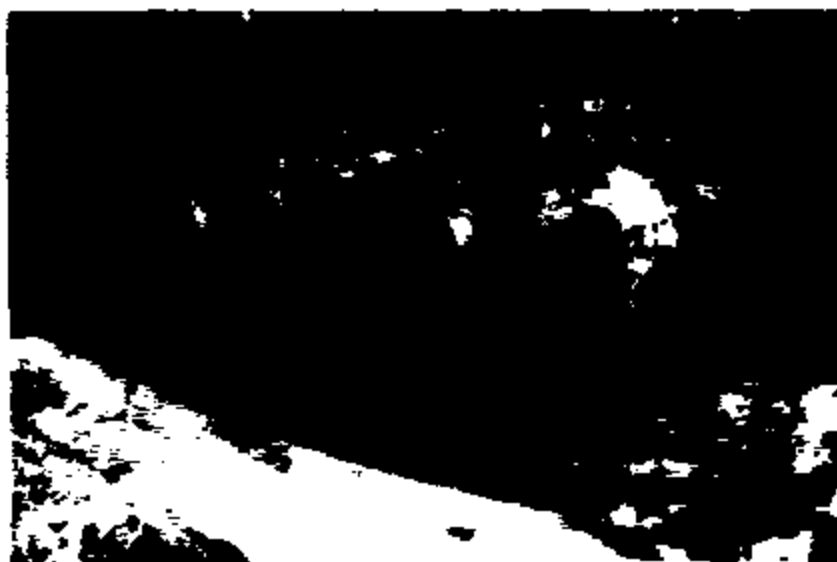


Photo # 2

United Investigations & Security, Inc.

07/04

EX-100000



Photo 1

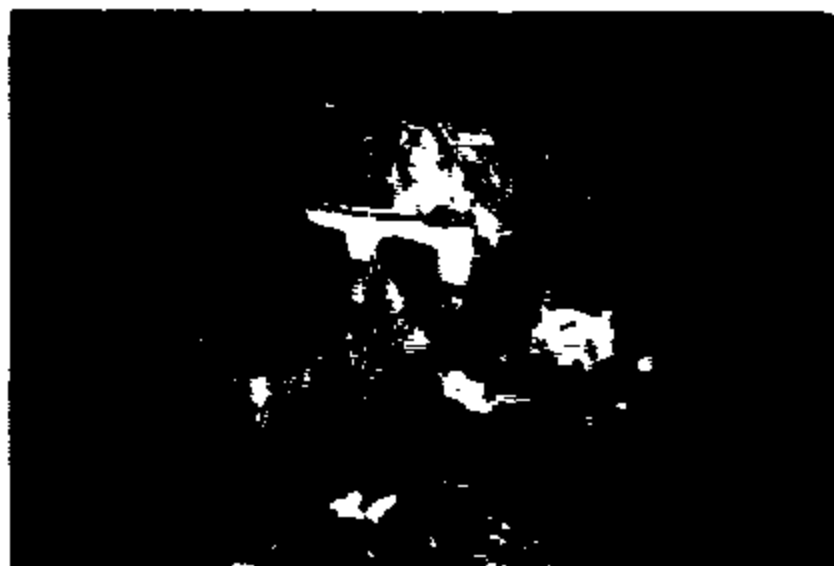


Photo 2

United States Department of Justice, FBI

EXHIBIT 15805



Photo A



Photo B

E085-605-LC-0627

Confidential Inc. Bearings & Seals, Inc.

Exhibit [REDACTED]

EXHIBIT

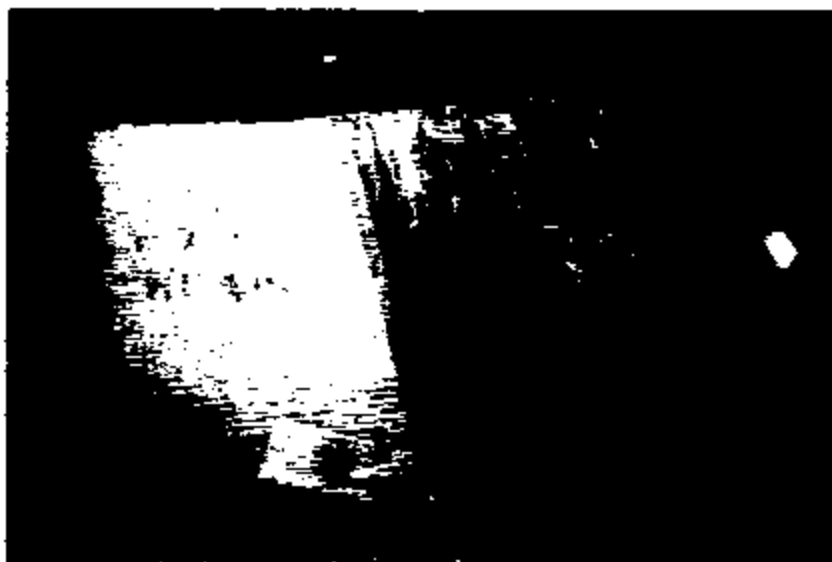


Exhibit A



Exhibit B

Product Investigations & Science - 175

FIGURE 1 [REDACTED] CARBON



Photo 1



Photo 2

United Insurance & Sureties, Inc.

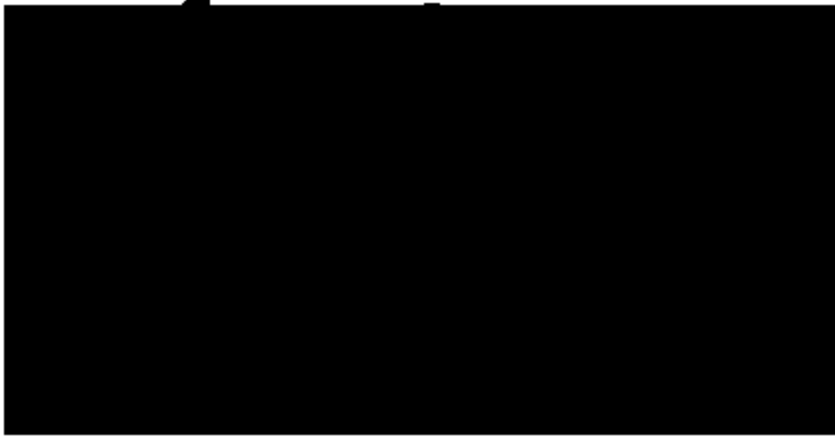
1940-1949



Photo 1



Photo 2





FARMERS

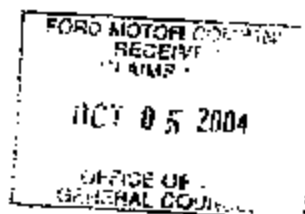
National Document Center
P.O. Box 268992
Oklahoma City, OK 73126-8992
consumer affairs@farmersinsurance.com
SECTION
Fax: 877-217-1389

09/28/2004

4 OCT -5 49:28

Ford Motor Co.
Attn: Shawn Norton
P.O. Box 6248 - MD 3ne B
Dearborn, MI 48126

Re: Our Insured: [REDACTED]
Loss Date: 07/29/2004
Claim Number: [REDACTED]
Total Amount Owed: \$22,554.81



Dear Shawn 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. *This 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 22,554.81. 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,
Mid-Century Insurance Company of Texas

S. A. Smith

ER05-005-LC-0034

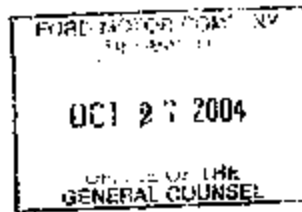


FARMERS

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

10/21/2004

Shawn Norton
Ford Motor Co.
P.O. Box 6248 - Md 3nc B
Dearborn, MI 48126



RELATIONSHIP
CENTER
OCT 26 P 12:40

Re: Our Insured: [REDACTED]
Loss Date: 07/29/2004
Claim Number: [REDACTED]
Total Amount Owed: \$22,554.81

Dear Ms. Norton:

We previously advised you of our subrogation rights in regards to the above-noted claim. Enclosed herewith is our Cause and Origin Report with color photographs. If you need any additional information please do not hesitate to contact me.

Your prompt response will be greatly appreciated.

Sincerely,
Mid-Century Insurance Company of Texas

Scott Sheffield

Scott Sheffield
Special Subrogation Representative
512-238-5739

*UCC
BWI 7415.*

*- NO VPH
- Houston, TX
- Expt
- photos
- Fire/pol. rpt*