



UNITED AUTOMOBILE INSURANCE COMPANY

P.O. BOX 600580 • NORTH MIAMI, FL 33160
305-940-7299 • 954-462-6803

DEC 27 2004

DECEMBER 21, 2004

FORD MOTOR COMPANY OFFICE OF THE GENERAL COUNSEL
MR. SHAWN L. NORTON
PARKLANE TOWERS WEST, SUITE #300
THREE PARKLANE BLVD.
DEARBORN, MICHIGAN 48126-2568

Re: Our Insured: [REDACTED]
Claim No.: [REDACTED]
Policy No: [REDACTED]
Date Of Loss: 08/31/04
Vehicle: 1998 FORD EXPEDITION
VIN: 1FMRU17L1WL [REDACTED]
Your Claim/File No: UNKNOWN
Company Payment: \$8,565.00 (pending salvage proceeds)
Insured's Deductible: \$500.00



Dear Mr. Shawn L. Norton:

Our above insured's vehicle was properly parked with the engine turned off when vehicle came on fire. The insured had returned home from shopping and had parked vehicle outside his residence garage thirty minutes prior to the fire. The fire engulfed the engine and subsequently the fire spread to the garage. The Cape Coral Fire Department was called to extinguish the fire and inspect the incident. The Fire Department's investigator determined that the fire started in the engine compartment due to a short circuit that ignited the fuel.

Our investigation establishes the point of origin for the fire was the cruise control deactivation switch located in the engine compartment on the driver's side. This type of failure has been observed and researched by Interscience, Inc. and has been revealed that there had been a number of complaints filed with the National Highway Traffic Safety Administration about similar cases in the past. I will submit four more cases similar to this one to Ford Motor Company. Therefore, under our right of subrogation, we request reimbursement for both the company payment and deductible amount shown above. Enclosed are our supporting documents for your review.

We have diaried our files for (15) fifteen days. Your prompt attention to this matter will be appreciated.

- WSD 3/11/98

- ESP - NO

BOW/UCC - 4 yrs.
2016

- 8/31/04
- 1998 Exped
- VIN
- \$44,000
- Cape Coral, FL
- \$8,565
- EXP



UNITED AUTOMOBILE INSURANCE COMPANY

P.O. BOX 600580 • NORTH MIAMI, FL 33160
305-940-7299 • 954-462-6803

Sincerely,

Jose Lopez
Subrogation Department
(305) 940-7299, ext. 2214
Enclosure: Supporting Documents

OCI/15 DAYS

ERG5-005-LC-1014

Cape Coral Fire Dept -

A						NFIRS -1 Basic													
18022 <small>FDID</small>	FL <small>State</small>	08/31/2004 <small>Incident Date</small>	S8 <small>Station</small>	04010870 <small>Incident Number</small>	00 <small>Expense</small>														
B Location						TER													
<input type="checkbox"/> See Voluntary Fire Module for Location <div style="border: 1px solid black; height: 20px; width: 100%;"></div> <div style="display: flex; justify-content: space-between;"> Number/Map Prefix Street or Highway </div> <div style="text-align: center; font-weight: bold;">CAPE CORAL</div> <div style="display: flex; justify-content: space-between;"> City State Zip Code </div>						Campus Type <div style="border: 1px solid black; height: 20px; width: 100%;"></div>													
C Incident Type			E1 Dates & Times		E2 Shifts & Alarms														
131 Passenger vehicle fire <small>Incident Type</small>			Dispatch 08/31/2004 11:48:30 Arrival 08/31/2004 11:53:17 Controlled : : Last Unit 08/31/2004 13:03:43 Cleared		Local Option B 1 Shift or Callout Alarms Dispatch														
D Aid Given or Received					E3 Special Studies														
N None					Local Option Smoke SIFT E2 Special Study Value														
F Action Taken			G1 Resources		G2 Estimated Dollar Losses & Values														
<input checked="" type="checkbox"/> Extinguish Primary Action Taken (1) <input checked="" type="checkbox"/> Salvage or overhaul Additional Action Taken (2) <input checked="" type="checkbox"/> Additional Action Taken (3)			<input type="checkbox"/> Check this box and skip this section if no Apparatus or Personnel resources used. <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th></th> <th>Apparatus</th> <th>Personnel</th> </tr> </thead> <tbody> <tr> <td>Suppression</td> <td>2</td> <td>8</td> </tr> <tr> <td>EMS</td> <td>0</td> <td>0</td> </tr> <tr> <td>Other</td> <td>2</td> <td>2</td> </tr> </tbody> </table> <input type="checkbox"/> Check box if incident equals incident able reported response.			Apparatus	Personnel	Suppression	2	8	EMS	0	0	Other	2	2	LOSSES: Reporting for all loss if known. Optional for age loss. None Property \$ 18,000 <input type="checkbox"/> Contents \$ 0 <input checked="" type="checkbox"/> PRE-INCIDENT VALUE: Property \$ 18,000 <input type="checkbox"/> Contents \$ 0 <input checked="" type="checkbox"/>		
	Apparatus	Personnel																	
Suppression	2	8																	
EMS	0	0																	
Other	2	2																	
Completed Modules			H1 Casualties		H3 Hazardous Materials Release		I Mixed Use Property												
<input checked="" type="checkbox"/> P-1 <input type="checkbox"/> Structure-3 <input type="checkbox"/> Civilian Fire Cas-4 <input type="checkbox"/> Fire Serv. Casualty-5 <input type="checkbox"/> EMS-6 <input type="checkbox"/> HazMat-7 <input type="checkbox"/> Wildland Fire-8 <input type="checkbox"/> Apparatus-9 <input type="checkbox"/> Personnel-10 <input type="checkbox"/> Areas-11			<input checked="" type="checkbox"/> None Death Injuries Fire Service Civilian H2 Detector		N None		Not mixed use												
J Property Use																			
965 Vehicle parking area																			
M Authorization																			
28807 <small>Officer in charge ID</small>		Signature RONALD G KLEIN		IN <small>Rank</small>		P7 <small>Assignment</small>													
09/09/2004 <small>Date</small>																			
Check box if shown as Officer in Charge <input type="checkbox"/> 28801 <small>Number testing report ID</small>		Signature RANDY M SEELEY		LT <small>Rank</small>		E6 <small>Assignment</small>													
						08/31/2004 <small>Date</small>													

K1 Person/Entity Involved		Business name (if applicable)		Phone Number	
Local Office					
<input type="checkbox"/> Check this box if agent address is incident location. Then skip the three duplicate address lines.		Mr., Ms., Mx. First Name [REDACTED]		MI Last Name [REDACTED]	
Number [REDACTED]		Prefix [REDACTED]		Street or Highway [REDACTED]	
Post Office Box [REDACTED]		Apt./Suite/Room [REDACTED]		City CAPE CORAL	
State FL		Zip Code [REDACTED]		TER Street Type [REDACTED]	

K2 OWNER		Business name (if applicable)		Phone Number	
Local Office					
<input type="checkbox"/> Check this box if owner address is incident location. Then skip the three duplicate address lines.		Mr., Ms., Mx. First Name [REDACTED]		MI Last Name [REDACTED]	
Number [REDACTED]		Prefix [REDACTED]		Street or Highway [REDACTED]	
Post Office Box [REDACTED]		Apt./Suite/Room [REDACTED]		City [REDACTED]	
State [REDACTED]		Zip Code [REDACTED]		Street Type [REDACTED]	

Remarks:
 [REDACTED]

Engine 4 responded to the above address, on arrival w/ bat-1 we found a 1998 expedition w/ the front engine area w/ heavy fire. engine 6 called for the investigator to respond while enroute seeing heavy smoke showing.

Engine 6 used its 150' X 1 3/4" hose w/ foam. fr.comer was nozzle man. fire was close to home but no fire damage to home. investigator Ron Klein arrived and the scene was turned over to him. bat-1 canceled engine 4 response.

LJ. Sealey

P/7 responded at the request of E/6 to investigate a vehicle fire. The fire started in the engine compartment around the front and top of the engine. The owner stated that he has had no problems with the vehicle and that no repair has been needed. This investigator believes that the cause was due to a short circuit that ignited the fuel. There is no evidence of foul play. This fire was

L2	<div style="border: 1px solid black; padding: 2px;"> Summary: L201 01/01/04 </div> <p>accidental in nature. Time/Date: 08:10 on 09/08/2004 by RONALD Q KLEIN 29807 RQLEIN</p>
----	--

09/08/04

Date Month Day Year	F3 Equipment Portability <input type="checkbox"/> Provide equipment inventory with the report by the person, if equipment is to be used in another jurisdiction, provide the name of the person.	Fire Department Name (1) Fire Department Name (2) Fire Department Name (3)
H1 Structure Property Involved <input type="checkbox"/> None <input checked="" type="checkbox"/> Involved in ignition and burned	H2 Mobile Property Type & Make 10 Passenger and vehicle, other Make property type PG Ford Mobile property make	Legend <input type="checkbox"/> Fire-Prevention Available Name of jurisdiction proposed to file with report <input type="checkbox"/> Attorney report attached <input type="checkbox"/> Police report attached <input type="checkbox"/> Fire Department report attached <input type="checkbox"/> Other reports attached
Exposition Initial only (if applicable) [Redacted]	FL 1FMRU17UN Date 10/1/04	[Redacted]

Cape Coral Fire Dept.

A	18022 F08	FL State	08/31/2004 Incident Date	S8 Station	04010870 Incident Number	00 Severity	<input type="checkbox"/> Drive <input type="checkbox"/> Change	HPMS - 10 Personnel
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Apparatus or Resource <small>Use codes listed below</small>	Dates and Times <small>Check if same date as alarm date</small>		Sent <input type="checkbox"/>	Number of People	Use <small>Check ONE box for each apparatus to indicate its status at the incident</small>	Actions Taken <small>List up to 4 actions for each apparatus and each personnel</small>	
1 ID BA71 Type B1	Dispatch <input checked="" type="checkbox"/>	08/31/2004 1204	<input type="checkbox"/>	1	<input checked="" type="checkbox"/> Other	81	
Arrival <input checked="" type="checkbox"/>	08/31/2004 1204						
Clear <input checked="" type="checkbox"/>	08/31/2004 1204						

Personnel ID	Name	Rank or Grade	Attend	Action Taken	Action Taken	Action Taken	Action Taken
28206	GIVENS, ANTHONY E	BC	<input type="checkbox"/>	81			

Apparatus or Resource <small>Use codes listed below</small>	Dates and Times <small>Check if same date as alarm date</small>		Sent <input checked="" type="checkbox"/>	Number of People	Use <small>Check ONE box for each apparatus to indicate its status at the incident</small>	Actions Taken <small>List up to 4 actions for each apparatus and each personnel</small>	
2 ID E4A Type 11	Dispatch <input checked="" type="checkbox"/>	08/31/2004 1148	<input type="checkbox"/>	4	<input checked="" type="checkbox"/> Suppression	93	
Arrival <input type="checkbox"/>	08/31/2004 1155						
Clear <input checked="" type="checkbox"/>	08/31/2004 1155						

Apparatus or Resource <small>Use codes listed below</small>	Dates and Times <small>Check if same date as alarm date</small>		Sent <input checked="" type="checkbox"/>	Number of People	Use <small>Check ONE box for each apparatus to indicate its status at the incident</small>	Actions Taken <small>List up to 4 actions for each apparatus and each personnel</small>	
10 ID E8 Type 11	Dispatch <input checked="" type="checkbox"/>	08/31/2004 1148	<input type="checkbox"/>	4	<input checked="" type="checkbox"/> Suppression	11 12	
Arrival <input checked="" type="checkbox"/>	08/31/2004 1153						
Clear <input checked="" type="checkbox"/>	08/31/2004 1215						

Personnel ID	Name	Rank or Grade	Attend	Action Taken	Action Taken	Action Taken	Action Taken
28006	LEWANDOWSKI, JOHN C	EN	<input type="checkbox"/>	11	12		
28801	LYNCH, JOHN R	FF	<input type="checkbox"/>	11	12		
28801	SEELEY, RANDY M	LY	<input type="checkbox"/>	11	12		
20307	COMER, JEREMY	FF	<input type="checkbox"/>	11	12		

Apparatus or Resource <small>Use codes listed below</small>	Dates and Times <small>Check if same date as alarm date</small>		Sent <input checked="" type="checkbox"/>	Number of People	Use <small>Check ONE box for each apparatus to indicate its status at the incident</small>	Actions Taken <small>List up to 4 actions for each apparatus and each personnel</small>	
4 ID P7 Type 92	Dispatch <input checked="" type="checkbox"/>	08/31/2004 1151	<input type="checkbox"/>	1	<input checked="" type="checkbox"/> Other	86	
Arrival <input checked="" type="checkbox"/>	08/31/2004 1204						
Clear <input checked="" type="checkbox"/>	08/31/2004 1303						

A 18022 FL 08/31/2004 S8 04010870 00 <small>FD# State Incident Date Station Incident Number Station</small>		NFIRS - 2 Fire
B Property Details B1 <input type="checkbox"/> Not Residential <small>Indicate whether or not the building is a residential building or other building involved</small> B2 <input type="checkbox"/> Buildings not involved <small>Number of buildings involved</small> B3 <input type="checkbox"/> Motor <input type="checkbox"/> Large (over 1000 sq ft) motor <small>Area covered (outside area)</small>		C On-Site Materials or Products <input checked="" type="checkbox"/> None On-site material (1) On-site material (2) On-site material (3)
D Ignition D1 60 Engine area, running gear, wheel area <small>Area of fire origin</small> D2 <input type="checkbox"/> Undetermined <small>Initial source</small> D3 <input type="checkbox"/> Undetermined <small>Sign first burning</small> 1 <input checked="" type="checkbox"/> Check box if fire spread was restricted to object of origin D4 <input type="checkbox"/> Undetermined <small>Type of material first ignited</small> <small>Regulated only if item first ignited code is 90 or 40</small>	E1 Cause of Ignition <input type="checkbox"/> Check box if fire is an apparent reason. E2 <input checked="" type="checkbox"/> Cause under investigation E2 Factors Contributing to Ignition <input type="checkbox"/> None Factor contributing to ignition (1) Factor contributing to ignition (2)	E3 Human Factors Contributing to Ignition 1 <input type="checkbox"/> Adult 2 <input type="checkbox"/> Possibly impaired by alcohol or drugs 3 <input type="checkbox"/> Unattended person 4 <input type="checkbox"/> Possibly mentally disabled 5 <input type="checkbox"/> Physically disabled 6 <input type="checkbox"/> Multiple persons involved 7 <input type="checkbox"/> Age was a factor <small>Reduced age of person involved</small> 1 <input type="checkbox"/> Male 2 <input type="checkbox"/> Female
F1 Equipment Involved in Ignition <input checked="" type="checkbox"/> None <small>If equipment was not involved, stop in Section G.</small> Equipment involved Brand Model Weight Year	F2 Equipment Power Equipment Power Source F3 Equipment Portability <input type="checkbox"/> <small>Portable equipment normally can be moved by one person, is designed to be used in multiple locations, and requires no tools to install.</small>	G Fire Suppression Factors Enter up to three codes. <input type="checkbox"/> None Fire suppression factor (1) Fire suppression factor (2) Fire suppression factor (3)
H1 Mobile Property Involved <input type="checkbox"/> None H2 <input checked="" type="checkbox"/> Involved in ignition and burned	H2 Mobile Property Type & Make 10 Passenger road vehicle, other Mobile property type FQ Ford Mobile property make	Local Use <input type="checkbox"/> Pre-Fire Plan Available <small>Some of the information presented in this report may be based upon reports from other agencies</small> <input type="checkbox"/> Aerial report attached <input type="checkbox"/> Police report attached <input type="checkbox"/> Coroner report attached <input type="checkbox"/> Other reports attached
Expedition Mobile property brand License Plate Number FL 1FMRU17LW State VOR Number		98 Year

Cape Coral Fire Dept.

A	18022 PMD	FL State	08/31/2004 Incident Date	S6 Station	04010870 Incident Number	00 Reports	<input type="checkbox"/> Delete <input type="checkbox"/> Change	MPRS - 9 Apparatus or Resources
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B	Apparatus or Resource <small>Use codes listed below</small>	Dates and Times <small>Check 6 series date 22 start date</small>	Sent <input type="checkbox"/>	Number of People	Use <small>Check 6 series for each apparatus to indicate its main use at the incident.</small>	Actions Taken
1	ID BAT1 Type 91	Dispatch <input checked="" type="checkbox"/> 08/31/2004 1204 Arrival <input checked="" type="checkbox"/> 08/31/2004 1204 Clear <input checked="" type="checkbox"/> 08/31/2004 1204	<input type="checkbox"/>	1	<input checked="" type="checkbox"/> Other	81
2	ID E4A Type 11	Dispatch <input checked="" type="checkbox"/> 08/31/2004 1148 Arrival <input type="checkbox"/> Clear <input checked="" type="checkbox"/> 08/31/2004 1155	<input type="checkbox"/>	4	<input checked="" type="checkbox"/> Suppression	93
3	ID E6 Type 11	Dispatch <input checked="" type="checkbox"/> 08/31/2004 1148 Arrival <input checked="" type="checkbox"/> 08/31/2004 1153 Clear <input checked="" type="checkbox"/> 08/31/2004 1215	<input type="checkbox"/>	4	<input checked="" type="checkbox"/> Suppression	11 12
4	ID P7 Type 92	Dispatch <input checked="" type="checkbox"/> 08/31/2004 1151 Arrival <input checked="" type="checkbox"/> 08/31/2004 1204 Clear <input checked="" type="checkbox"/> 08/31/2004 1303	<input type="checkbox"/>	1	<input checked="" type="checkbox"/> Other	86



Type of Apparatus or Resource	Aircraft	Medical & Rescue
Ground Fire Suppression	41 Aircraft fixed wing tanker	71 Rescue unit
11 Engine	42 Helicopter	72 Urban search & rescue unit
22 Truck or aerial	43 Helicopter	73 High angle rescue unit
13 Quin	40 Aircraft, other	78 ALS unit
64 Tanker & pumper combination		79 ALS unit
16 Brush truck	Marine Equipment	78 Medical and rescue unit, other
17 ARF (Aircraft Rescue and Firefighting)	51 Fire boat with pump	
18 Ground fire suppression, other	32 Boat, no pump	Other
	50 Marine apparatus, other	81 Mobile command post
Heavy Ground Equipment		82 Chief officer car
24 Dozer or plog	Support Equipment	83 Medical unit
22 Tractor	81 Breathing apparatus support	84 Type 1 hand crew
24 Tanker or tender	82 Light and air unit	85 Type 2 hand crew
28 Heavy equipment, other	80 Support apparatus, other	88 Privately owned vehicle
		88 Other apparatus/resource

More apparatus?
 Use additional sheets.

RN None
 UN Undetermined

Our Project No: L1271-02
Insured: Unknown
Claim No: 805558
Date of Loss: Unknown
Date of Notification: November 3, 2004
Date of Inspection: November 5, 2004

E005-003-LC-1021



Interscience, Inc.

7705 Ann Ballard Road
Tampa, FL 33634-2334
(813) 885-4774
Fax (813) 889-9157

Our Project No: L1271-02
Insured: Unknown
Claim No: 805558
Date of Loss: Unknown
Date of Notification: November 3, 2004
Date of Inspection: November 5, 2004

Report
Prepared For:

United Automobile Insurance Company
3909 NE 163rd Street
North Miami Beach, FL 33160

Attn: Mr. Juan Delgado

Report
Prepared By:

Sean P. Clince, BSME



Interscience, Inc.

7705 Ann Ballard Road
Tampa, FL 33634-2334
(813) 885-4774
Fax (813) 889-9157

November 19, 2004

United Automobile Insurance Co.
3909 NE 163rd Street
N Miami Beach, FL 33160

Attn: Mr. Juan Delgado

Re: Our Project No: L1271-02
Insured: Unknown
Claim No: 805558
Date of Loss: Unknown
Date of Notification: November 3, 2004
Date of Inspection: November 5, 2004

Dear Mr. Delgado:

As requested, Interscience, Inc. has conducted an examination of the insured vehicle in connection with the subject fire loss, and submits its findings in this report.

BACKGROUND

It was reported that the subject vehicle had been parked in the driveway of the insured's residence at the time of the loss. The fire had occurred a short period of time after the insured had driven the subject vehicle.

The incident was reported to Allstate Insurance Company and Interscience, Inc. was subsequently requested to conduct an investigation into the subject claim.

The vehicle was transported from the insured's residence to Co-Part located in Riverview, Florida.

OBSERVATIONS/DISCUSSION

On November 5, 2004, Interscience, Inc. visited the Co-Part Auto Salvage, at 12020 US Highway 301 South, Riverview, Florida. The purpose of this visit was to conduct an origin and cause investigation of the subject vehicle fire.

The subject vehicle was a maroon 1998, Ford Expedition bearing vehicle identification number (VIN) 1FMRU1741WL [REDACTED]. The odometer reading could not be determined at the time of the inspection as the odometer was damaged by smoke and heat from the subject fire.

A visual examination of the interior and exterior of the subject vehicle revealed that the windshield of the vehicle had sustained fire damage as a result of radiant heat from the engine compartment. The hood of the engine compartment had been consumed. This was caused by the subject fire which had melted the metal of the vehicle's hood. The interior of the vehicle had evidence of fire and smoke damage. Inspection of the passenger compartment did not reveal any fire causing malfunction.

The area of fire origin was determined to be located within the engine compartment of the vehicle. The engine compartment of the vehicle was systematically and thoroughly inspected and photo documented.

Evidence remaining indicated that the cause of the fire was most probably electrical in nature. The fire pattern in the engine compartment of the vehicle indicated that the fire had originated on the driver's side of this compartment. Located in this area was a cruise control deactivation switch. This switch was located on the brake master cylinder on the driver's side of the engine compartment. The deactivation switch and master cylinder were destroyed by the intense heat of the fire and were not available for an examination.

Failures of cruise control deactivation switches have been observed by Interscience, Inc. personnel in the past. Research also revealed that there had been a number of complaints filed with the National Highway Traffic Safety Administration (NHTSA) about a similar failure in the Ford F-150 and Ford Expedition.

CONCLUSIONS

It is the conclusion of Interscience, Inc. that the subject fire originated within the engine compartment of the vehicle. Due to the extensive fire damage present, a specific point of origin could not be identified. The precise cause of the fire could not be

conclusively determined at this time. No other potential causes for this fire were identified at the time of the examination.

The point of origin may have been within a cruise control deactivation switch located in the engine compartment on the driver's side. This type of failure has been observed by Interscience, Inc. personnel in the past. Research also revealed that there had been a number of complaints filed with the National Highway Traffic Safety Administration about similar failures in the past.

Interscience, Inc. operates as an independent contractor. The opinions expressed are based upon information available at the time this report was drafted and draw upon the background, training and experience of the personnel involved in the investigation. The evaluation is subject to modification, amendment, and revision without prejudice, as further information may be revealed by continuing discovery.

In accordance with the ASTM standards, Interscience, Inc. will retain all records related to this assignment for seven years.

ENG-885-LC-1026

United Automobile Ins. Co.
November 19, 2004
L1271-02 - Page 5

Respectfully submitted,

INTERSCIENCE, INC.

Sean P. Clince
Sean P. Clince, BSME *KLC*

SPC:klc

Signed in the absence of
avoid delay in mailing

Reviewed by,

Glen B. Hinton

EP05-985-1C-1027

PHOTO INDEX- L1271-02

1-11. Exterior views of the subject vehicle.



EP05-025-10-1828

3.

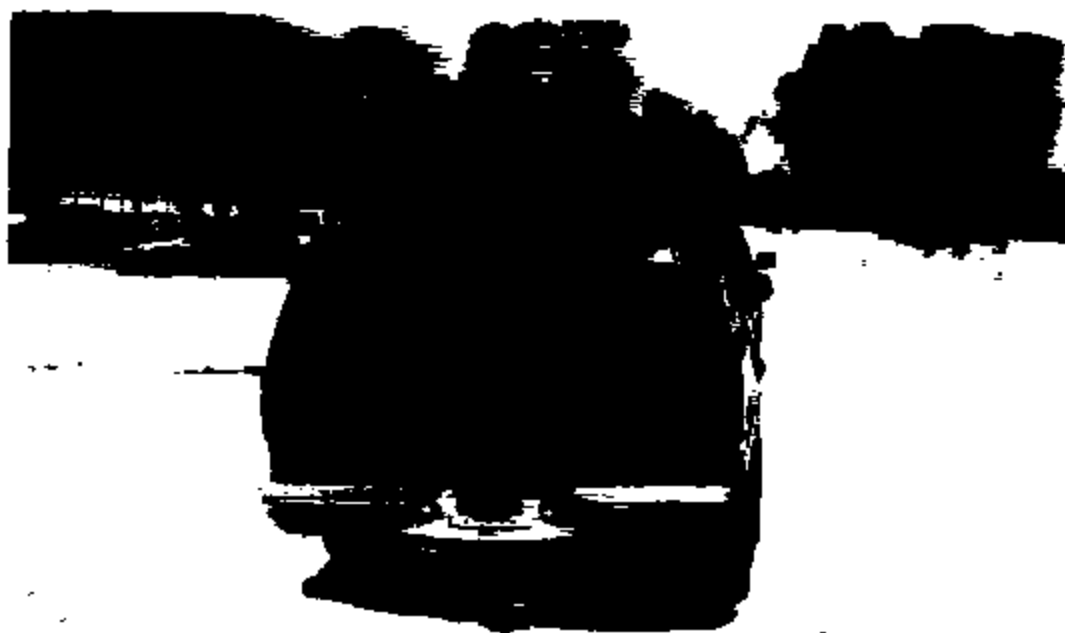


4.



ENAB-005-LC-1029

5.



6.



FD-302 (Rev. 4-15-64)

7.



8.

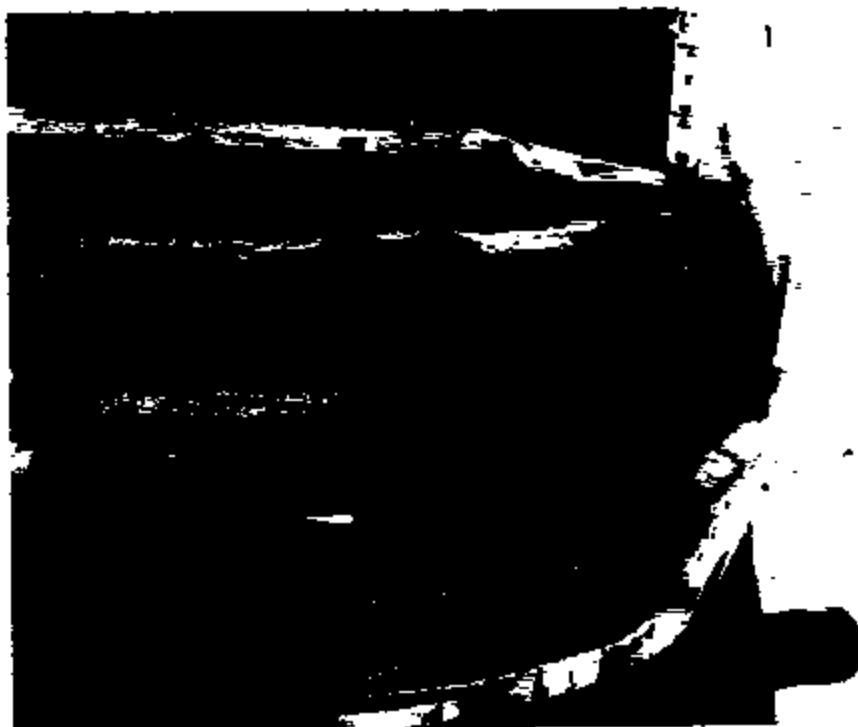


100-27-200-200

9.



10.



EROS-005-LC-1032

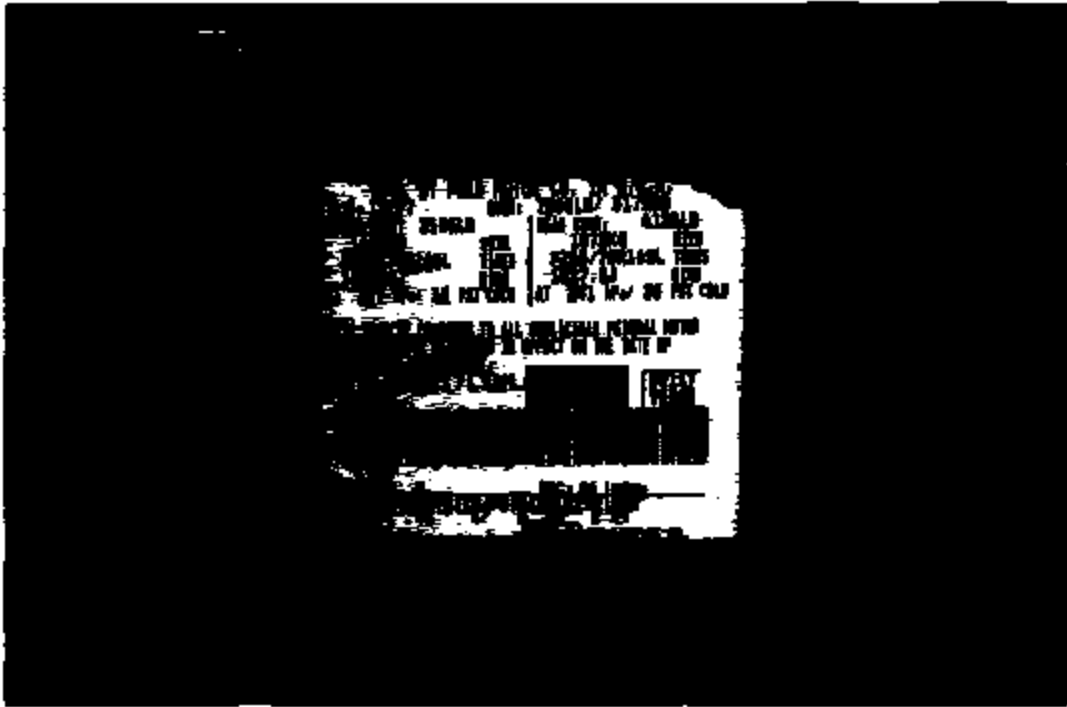
11.



12-13. Views of the subject vehicle VIN.



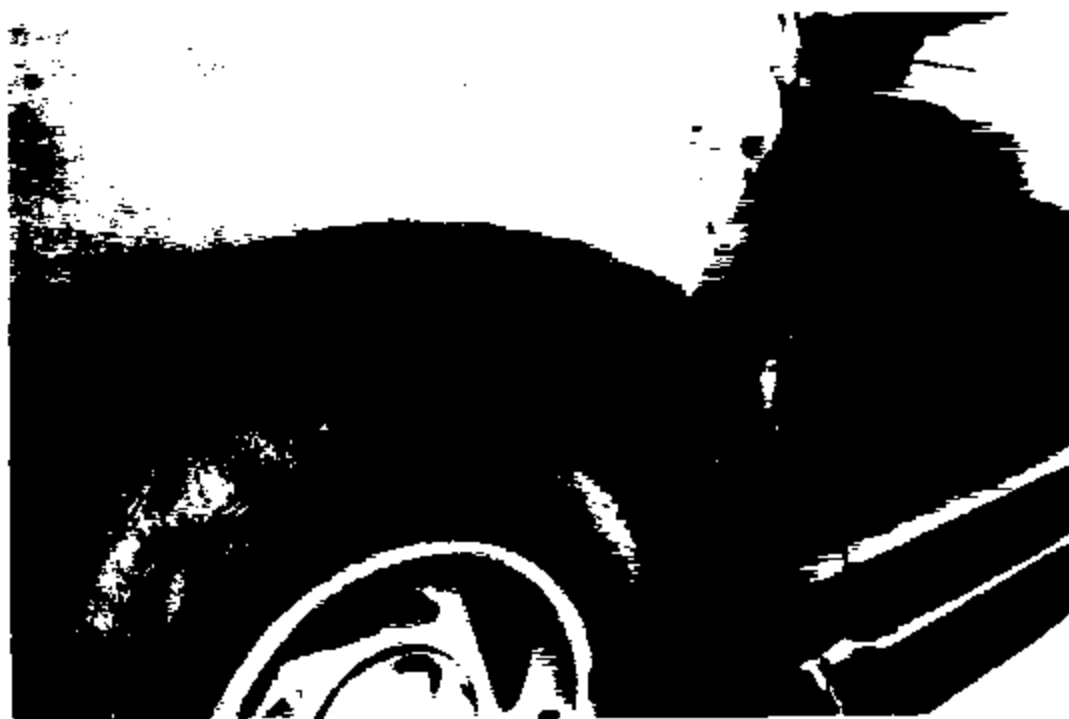
ENG-005-LC-1033



14. A view of the subject vehicle odometer.



15-18. Views of the front wheel wells of the subject vehicle.



16.



2025 RELEASE UNDER E.O. 14176

17.



18.



ENR-805-LC-1808

19-39. Interior views of the subject vehicle.



20.



DNB-005-LC-1037

[illegible]



EPMS-005-LC-1039

24.



25.



2025-005-LC-1848



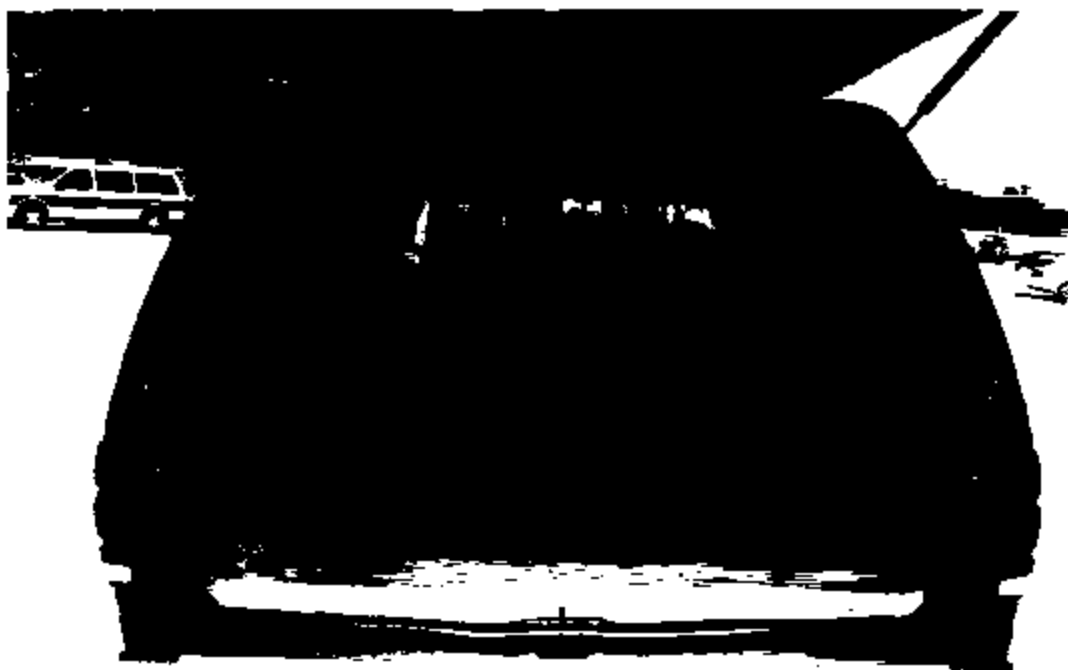
27.



28.



29.



30.



EA65-685-LC-1843

31.



32.



33.



EA85-005-LC-1845

34.



35.



36.



37.



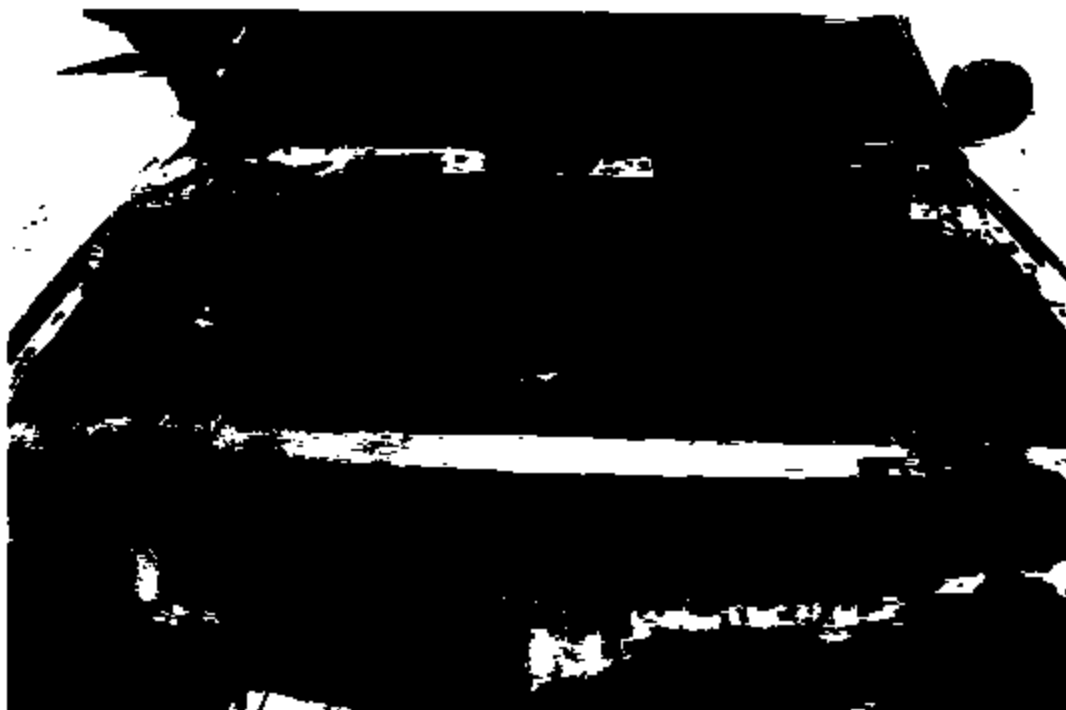
EROS-885-LC-1947



39.



40-65. Views of the engine compartment of the subject vehicle.



6005-585-LC-1040

41.



42.



43.



44.



2005-005-LC-1051

45.



46.



47.



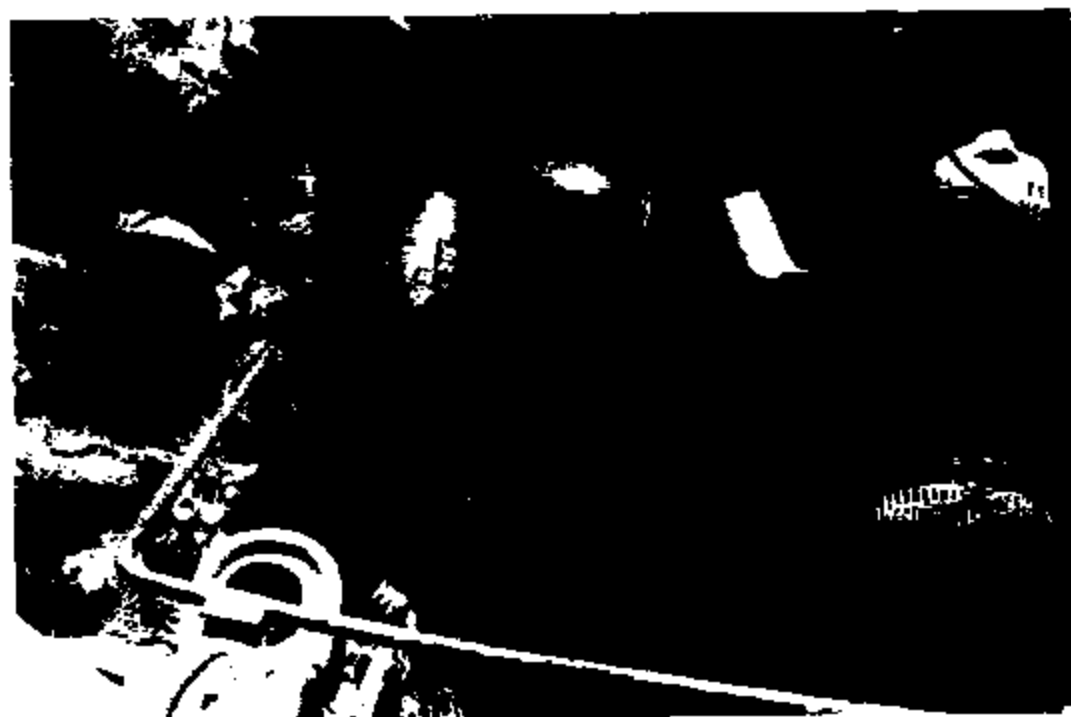
48.



49.



50.



51.



52.



DAVIDSON-LC-1000

53.



54.



ER25-025-LC-1856

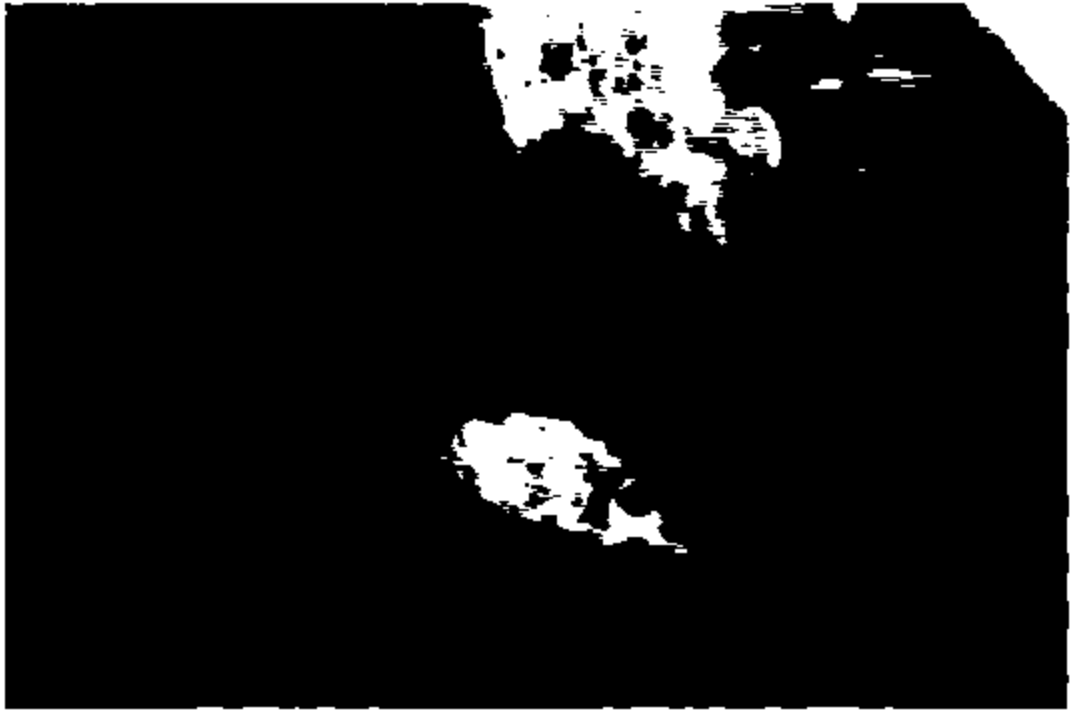
55.



56.



57.



58.



59.



60.



ERG-505-LC-1058

61.



62.



63.



64.



EROS-685-LC-1881



66-69. Views of the area where the cruise control deactivation switch had been mounted.



67.



68.

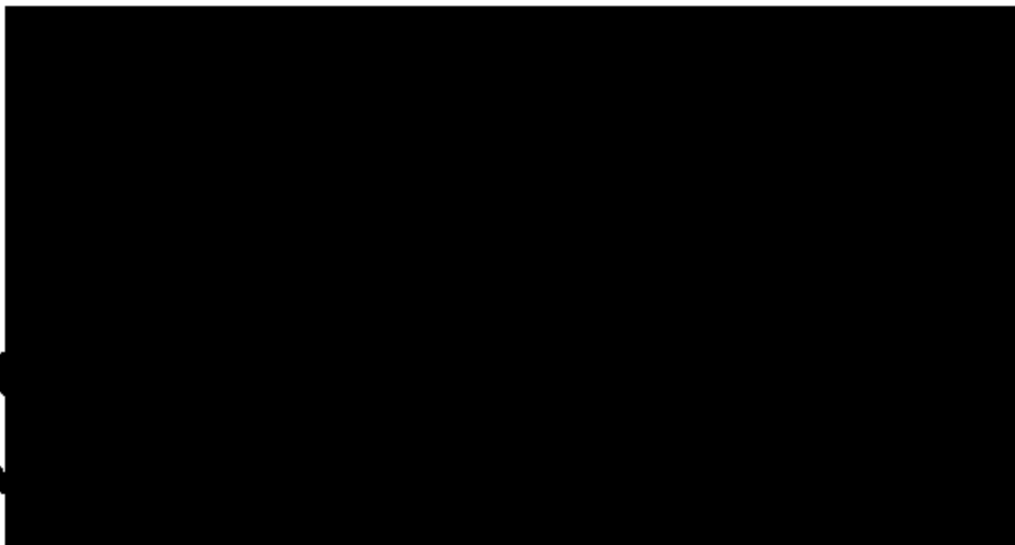


EROS-005-LC-1063

69.



ERG-505-LC-1004





Allstate.

You're in good hands.

Certified Mail # 7003 2260 0007 1523 4776

December 21, 2004

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

RE: Claim #: [REDACTED]
Our Insured: [REDACTED]
Loss Date: 7/14/04
Amt. of Claim: \$22882.31

Attention Shawn Norton:

The above noted subrogation claim has been identified as a product liability loss. We paid our insured for their loss and are looking to you for reimbursement. Should you or your carrier need more information, please call or write me. Please remit payment to Allstate Payment Processing Center, Attn: Subro Cash, PO Box 227257, Dallas, TX 75222-7257. Please include our claim number.

Complete description of the incident: Vehicle caught on fire after being parked overnight. The fire flow patterns show that the fire originated in the left rear corner of the engine compartment with the most intense burn surrounding the left rear situated brake master cylinder. This is consistent with other fires from the brake pressure switch failing. The vehicle was purchased 7/14/01.

Our statement of defect: Strict Liability

Location of evidence: BCAP, [REDACTED] Houston, TX 77032. 800-443-1307. Stock # 4018688

Manufacturer: Ford

Model: Expedition

Year: 2001

VIN: 1FMRU17W71L [REDACTED]

The following information is attached:

Check copies

Payment supporting paperwork

C&O report and photos

Please acknowledge receipt of this claim and your position regarding payment of our damages within 30 days.

Sincerely,

David Laughlin, SCLA

Subrogation Senior Service Representative

Roanoke National Subrogation Claims Center

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Hours: 8:00 AM - 4:30 PM EST Monday - Friday

ER05-005-LC-1065

Forensic Analysts, Inc.

**PRELIMINARY
REPORT OF FINDINGS**

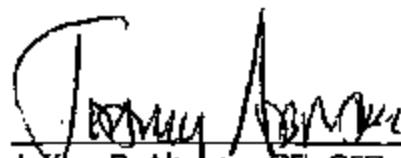
CLAIM NO [REDACTED]

INSURED: [REDACTED]

Prepared for:

**ALLSTATE INSURANCE COMPANY
16700 EAST HARDY, SUITE A
HOUSTON, TEXAS 77032**

ATTN: MS. CHERYL LEROY



**Jeffrey R. Abrams, CFI, CFEI, ASE, CVFI
President**

July 31, 2004

FAI File No. 3356

ENG-885-LC-1885

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I. INTRODUCTION

Reportedly, on July 14, 2004, a fire occurred, involving a 2001 Ford Expedition vehicle. On July 14, 2004, Forensic Analysts, Inc. was retained by Ms. Cheryl LeRoy of Allstate Insurance Company, to inspect the vehicle, and determine the origin and cause of the vehicle fire.

On July 14, 2004, Mr. Jeffrey Abrams, CFI, CFEL, ASE, CVFI, of Forensic Analysts, Inc., inspected and photographed the fire debris left on the driveway front under the Ford Expedition vehicle, located at the insured's residence, [REDACTED] Beach Court, in Spring, Texas.

On July 20, 2004, Mr. Jeffrey Abrams, CFI, CFEL, ASE, CVFI, of Forensic Analysts, Inc., inspected and photographed the Ford Expedition vehicle, located at Bayou City Auction Pool, 16602 E. Hardy, Houston, Texas.

Samples of both engine oil and automatic transmission fluid were taken, should an oil analysis be desired to help determine pre-fire condition of the engine and/or transmission. The remains of the master cylinder, the remains of the fallen wire, and the remains of the fallen pressure switch were all taken into our possession should an oil analysis be desired. These samples will all be stored at the office of Forensic Analysts, pending further instruction from Allstate Insurance.

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

pedal deactivation switch for the cruise control is secured to a boss in the front portion of the brake master cylinder. This fire burn pattern as observed is purely consistent with fire burn patterns that had been identified as originating from failed electronics, surrounding the brake master cylinder.

The simple fact still remains that all components associated with this brake master cylinder were not available for our inspection, and could not be more closely analyzed to more accurately determine a specific cause of the fire. The exact cause of this fire, therefore, is required to be labeled as undetermined.

III. DISCUSSION

The scope of our inspection was to perform a vehicle fire origin and cause.

The first inspection that is being made is of the fire debris that reportedly had fallen beneath the burning vehicle, prior to the vehicle having been towed away from the fire scene. Again, this first inspection is being performed at 3407 Utah Beach Court, in Spring, Texas.

INTERVIEW WITH THE INSURED

An interview with the insured, [REDACTED] (who shall be referred to as "she" in the following interview), helped construct an order of events immediately preceding the onset of this vehicle fire.

1. She stated that she purchased the vehicle new, and it was approximately three (3) years old.
2. She said that the vehicle had between 49,000 and 59,000 miles on it, at the time of the fire.
3. She has been having some problems that reportedly had been repaired at an auto repair establishment called Wholesale Auto, as well as Planet Ford. She basically referenced the oil having been changed, a fuse having been changed at Planet Ford, and the check-engine light recently had illuminated.
4. She said that the vehicle had not been involved in any accidents, at all.

5. There had been no installation of any aftermarket components on the vehicle. The alarm was the original one with the vehicle, and there was no aftermarket stereo.
6. She said that the vehicle came equipped with a six-pack CD changer that was OEM (Original Equipment Manufacturer) as well.
7. Also, the vehicle had an entertainment system in it that came with the vehicle, which was installed at the time of purchase of the vehicle. She said it had a VCR and a television screen that dropped down from the ceiling, but she said that the vehicle had been involved in a theft, and the television screen was not available, and was not in the vehicle at the time of the fire.
8. The vehicle was locked, and the windows were up.
9. She stated that she drove the vehicle into her driveway, and parked it approximately five feet (5') away from the garage door, and left it there from 9:30 at night until the fire was discovered at 5:30 the next morning.
10. The fire burned approximately fifteen (15) minutes, prior to the fire department coming, and extinguishing the fire.
11. As the vehicle was burning in the driveway, a passerby actually hooked onto the rear bumper to pull the vehicle away from the house. They dragged the vehicle from the left-side, forward-most section, immediately neighboring the closed garage door, and pulled it until the rear tires were actually on the street, and the front tires were on the driveway on the right-hand side.

12. The vehicle had been parked in the driveway from 9:30 p.m. the evening before and, again, was discovered at 5:30 a.m. on the date of the loss.
13. Also, reportedly, the vehicle was towed away to the storage facility and, while the vehicle was at the storage facility, caught on fire again. Whether or not it was extinguished by the fire department will need to be addressed.

At the time of our inspection, there were three (3) piles of fire debris that had fallen below the vehicle, which were actually swept together by the insured, prior to our inspection. One pile was immediately below the left side of the engine compartment, approximately five feet (5') away from the garage door. The second pile was near where the left rear tire and wheel assembly would have been situated. The third pile was under the engine compartment, after the vehicle had been dragged out toward the end of the driveway, when the rear tires were on the street. We will be going through the piles, and removing components that could lead to discovery, relating to the onset of this vehicle fire.

DEBRIS INSPECTION

Our inspection of the **fallen fire debris** revealed the following:

1. There was little evidence of any significant burned remains in the pile closest to the street, or surrounding the pile closest to the left rear tire and wheel assembly.
2. There were pieces of the fallen aluminum alloy brake master

cylinder that had fallen to floor level, and lay near the top of the fallen fire debris pile. This would have been in the left half of the engine compartment, or below the left half of the engine compartment.

3. We observed not only what appeared to be the semi-consumed remains of an aluminum brake master cylinder section, but also a pressure switch, consistent with the pressure switches that are used for the brake pedal deactivation component, that are secured to the top front-most boss on the brake master cylinder.
4. We also observed a number of separated and fallen wire remains. It is unknown what these wire remains were routed to, but the remains of the master cylinder, the remains of the fallen wire, and the remains of the fallen pressure switch were all taken into our possession, and will be stored at the office of Forensic Analysts pending further instruction from Allstate Insurance. Of course, we need to match these components up to those associated with those that are on the vehicle at this point in time to help establish an area of fire origin.

This **second inspection** is the inspection of the vehicle that burned.

FORD VEHICLE IDENTIFICATION

The vehicle was identified as a severely burned, white, four-door, 2001 Ford Expedition vehicle, bearing Texas license plate number [REDACTED]. The vehicle identification numbers could not be read at the time of our inspection.

FORD VEHICLE INSPECTION

Our inspection of the **Ford Expedition vehicle**, relating to **pre-existing body damage**, revealed no evidence of any significant body damage at all. Not only was there no indication of any swirl marks or body filler in the burned areas surrounding the front of the vehicle, there was no indication of any unevenness relating to film thickness, surrounding the unburned exterior body panels. All evidence was consistent with this vehicle having not been in any significant accident prior to this claim, and prior to this inspection.

Our inspection of the **vehicle exterior**, which relates to potential **violation** or **forced entry** into a locked vehicle without the use of the proper door key, revealed:

1. There was no indication of any compromise surrounding any right side or left side door lock/handle assembly, to indicate forced entry into a locked vehicle without the use of the proper door key.
2. There was no indication of any violation on the vehicle exterior, other than that which was likely caused by firefighter access to open up the left front driver's door with a port-a-power type of tool. Even though this was not identified in pre-existing damage, this damage is not the result of a traditional violator or thief. There was significant separation of the rear portion of the left front door panel, immediately away from the left side "B" pillar. Again, this is consistent with firefighter efforts to gain entry into a locked vehicle without utilizing the proper door key.
3. Forced entry, however, is a moot point, due to the fact that all exterior window glass was shattered as a result of the fire.

4. There was no indication of any component removal from this vehicle, at all, to indicate any type of theft had occurred.

Our inspection of the **vehicle exterior**, which relates to a **vehicle fire**, revealed:

1. The burn was definitely least intense surrounding the rear of the vehicle, as the only exterior window glass that was still intact, and attached, was that of the rear windshield on the rear hatch. In fact, the rear hatch still contained all of its white paint, and showed no evidence of burn, or even communicated heat effects, relating to this fire. Additionally, the rear chromed steel bumper, as well as the plastic composite top step ledge, was intact, attached, and was not damaged as a result of exposure to heat or fire, either.
2. Both left rear and right rear quarter panels were intact, and attached. There was no evidence of any significant burn, other than that immediately neighboring the shattered quarter panel glass, immediately neighboring the roof. Ninety percent (90%) of both right rear and left rear quarter panels were intact and attached, and unaffected by this fire. Again, the only effects of the fire were immediately neighboring the burned roof, immediately above the shattered quarter panel glass.
3. Both left rear and right rear tire and wheel assemblies were intact, attached, and fully inflated at the time of our inspection, obviously, not seriously affected as a result of exposure to heat or fire.
4. As we continued to move forward, it must be noted that a similar burn was observed on both right rear and left rear door panels.

Virtually all of the paint was intact, and attached, below the shattered door glass. The only section of burn was immediately above the shattered door glass, immediately neighboring the burned roof. There was, however, a significant amount of soot that was deposited on the left rear door panel, potentially consistent with moving toward an area of intense burn, as we were moving from the rear toward the front of this vehicle.

5. As we continued to move forward, it must be noted that the right front door panel was only severely burned, immediately surrounding the partially separated right-side exterior mirror. Thus far, this was the lowest area of burn, and was approximately three-feet (3') above ground, on only the front eighteen-inches (18") of the right front door panel. Obviously, as we were moving toward the engine compartment, the heat intensification was increasing.
6. Comparing the right front door panel to the left front door panel, it must be noted that the left front door panel was severely burned, consuming ninety percent (90%) of the paint. The only section of paint that was not consumed was that on the rear twelve-inches (12") on the bottom, consistent with a fire that was intensifying as we were moving from the rear toward the front, and obviously, a fire that was more intense on the left side than right side of this vehicle.
7. The rear half of the left side running board was intact and attached, and relatively unburned, while the front half of the left side running board was nearly consumed. However, ninety percent (90%) of the right side running board was still intact, and attached. The only part of consumption was that on the front twelve-inches (12"). This, again, is purely consistent with the fire having been much more

intense on the left side than the right side of this vehicle.

8. As we continued to move forward, it must be noted that severe burn was experienced by both right front and left front fenders. In fact, ninety-five percent (95%) of the paint was consumed on the right front fender, and virtually all of the paint was consumed on the left front fender. The only section of paint that was unconsumed on the right front fender was that on the very rear few inches. Again, this is consistent with a fire that was intensifying as we were moving toward the engine compartment, and a fire that may have been more intense on the left side than the right side of the engine compartment.
9. The vehicle hood was primarily consumed in this very intense engine compartment fire.
10. The vehicle front grille, as well as both right front and left front headlamp assemblies, was primarily consumed in this fire, as well.
11. The right front tire and wheel assembly was severely burned, and the tire was primarily consumed in this fire. There were still deformed remains of the aluminum alloy right front hubcap. The left front tire and wheel assembly, however, was burned to the point of consuming the entire tire, and there were no remains of the left front hubcap. This, again, is consistent with a fire that may have been more intense on the left side than the right side of the engine compartment.

In **summary** of our inspection of the **vehicle exterior**, all evidence is inconsistent with any violation, or incendiary action, that was observed on the vehicle exterior. All evidence is consistent with a fire that was distinctively more intense

in the engine compartment area, likely more intense on the left side than the right side of the engine compartment.

Our inspection of the **vehicle interior** revealed:

1. The burned remains of the storage compartment area behind the rear bench seat.
2. The severely burned third, or rear-most, bench seat. There was still ninety percent (90%) of the foam that was intact, and attached, on this rear-most bench seat.
3. As we continued to move forward, the middle bench seat was severely burned, but nearly seventy-five percent (75%) of the foam was consumed. There were still some unconsumed combustible materials on the middle bench seat. This, again, is indicative of a fire that was intensifying as we were moving from the rear toward the front of the vehicle interior.
4. As we continued to move forward, it must be noted that the front two (2) bucket seats were just skeletal remains. Virtually all of the combustible materials were consumed. There were some tires that were thrown on top of the front two (2) bucket seats. The tire remains were those that had burned under both right front and left front tire and wheel assemblies.
5. The center console was severely burned, and partially consumed, as we moved forward.
6. We observed primarily the skeletal remains of the vehicle dash.

7. We observed the burned remains of both passenger side and driver's side airbag assemblies.
8. We observed the severely burned remains of the steering column. The steering column, however, was primarily intact at the time of our inspection. The steering wheel was primarily consumed, as it was made of an aluminum alloy material.
9. We observed the fallen burned remains of the OEM (Original Equipment Manufacturer) AM/FM stereo, as well as the burned remains of a six (6) pack CD player that was in the center console.
10. Even though there was widespread burn and primary consumption of the vehicle dash, it must be noted that the aluminum alloy air conditioning evaporator core, as well as the heater core under the right third of the vehicle dash, were only severely burned, and partially consumed, on the top, closest to the firewall. This is purely consistent with a fire that was migrating from the engine compartment into the interior through the firewall access holes and HVAC (Heating, Ventilation, and Air Conditioning) ductwork.
11. Both right rear and left rear interior door panels were only severely burned, and partially consumed, on the top. However, both front door panels were severely burned, virtually consuming the top two-thirds of both left front and right front interior door panels. Again, this is all consistent with the fire intensifying as we were moving from the rear toward the front of the vehicle interior.
12. Seventy percent (70%) of all the wiring under the vehicle dash was insulation-void, having been burned in this fire. The area of greatest insulation consumption on the wiring was immediately above the

firewall access holes. This, again, is consistent with a fire traveling from the engine compartment into the interior, and not vice versa.

In **summary** of our inspection of the burn experienced by the **vehicle interior**, all evidence is consistent with:

1. The fire having been more intense as we moved toward the firewall from the rear portion of the vehicle interior.
2. The fire migrating from the engine compartment through the firewall access holes and HVAC (Heating, Ventilation, and Air Conditioning) ductwork, from the engine compartment into the interior, and not vice versa.
3. All components surrounding the vehicle dash appeared to be OEM (Original Equipment Manufacturer) or factory.

Our inspection of the **engine compartment** revealed this vehicle was equipped with a V8, multiport, fuel-injected engine, and an automatic transmission. Specifically:

1. There was widespread burn across the engine compartment, consuming the majority of the combustible materials.
2. The majority of the combustible materials in both right third and left third of the engine compartment had fallen away from the vehicle, either during transport or as a result of the fire.
3. The aluminum air conditioning accumulator in the right rear corner

of the engine compartment was primarily consumed.

4. The right front situated engine compartment battery was severely burned, near to the point of consumption as well. It had fallen to immediately above the right front upper control arm at the time of our inspection.
5. The right side engine fiberglass composite valve cover was severely burned, but was still primarily intact, at the time of our inspection. We were not able to inspect the upper valve train through this still intact, right side engine valve cover.
6. As we moved toward the open-air environment in the front of the engine compartment, the fire naturally intensified. This is very typical, and this fire was no different, as ninety percent (90%) of the aluminum air conditioning condenser and radiator were consumed in this fire. This fire was intense enough to also primarily consume the radiator cooling fan clutch, which was also composed of an aluminum alloy material.
7. Even though the fire traditionally intensified within the open-air environment in the front of the engine compartment, it must be noted that the aluminum alloy timing chain cover on the right side of the front of the engine was primarily intact and attached. But, there was partial consumption of the top portion of the left side aluminum alloy timing chain cover. This would indicate, potentially, that the fire was intensifying as we were moving from the right toward the left side of the front of the engine compartment.
8. The majority of the upper air intake manifold, which was an aluminum alloy material as well, was consumed in this very intense

engine compartment fire.

9. As we continued to move toward the left side of the engine compartment, it must be noted that there was much more intense burn experienced by the left side engine fiberglass composite valve cover, as it was partially consumed, exposing the camshaft gear and timing chain on the left side.
10. The left rear situated aluminum alloy master cylinder was consumed. There were no remains attached to the brake power booster at the time of our inspection. Likely, all components had dripped down to the floor, or it separated from the vehicle prior to transport. Even though a portion of the brake master cylinder was taken into our possession, the vast majority of this brake master cylinder was indeed not available for our inspection.
11. All of the wiring surrounding the consumed brake master cylinder was insulation-void, even the wiring immediately neighboring the right side of the left rear situated power distribution center.
12. This left rear situated power distribution center was severely burned, and primarily consumed. The only section of this power distribution center that was primarily intact, although severely burned and distorted, and partially consumed, was that on the rear three-inches (3") and the left side one-inch (1"). This burn was intense enough and long-lived enough to consume the majority of this power distribution center.
13. As previously stated, the majority of the wiring in the left third of the engine compartment was insulation-void, especially in the open-air environment surrounding the consumed brake master cylinder. A

FORD BRAKE PRESSURE SWITCH

Fires of this type in the left rear corner of the engine compartment on these Ford vehicles generate fire burn patterns that are consistent with fire burn patterns that originate surrounding failed electronics of the brake master cylinder. More specifically, the brake pedal deactivation switch for the cruise control is secured to a boss in the front portion of the brake master cylinder. This fire burn pattern as observed is purely consistent with fire burn patterns that had been identified as originating from failed electronics surrounding the brake master cylinder. However, at the time of our inspection, there was no indication of remains of the pressure switch surrounding the brake master cylinder. Even though we were able to identify that the front portion of the brake master cylinder experienced intense burn and partial consumption, and is identified as the area of most intense burn within the engine compartment, we were not able to, at the time of our inspection, locate the electrical components that may have fallen away from the brake master cylinder.

Due to the fact of the limited components that had been recovered relating to specific causes of the fire in the area of most intense burn, a definitive determination could not be made relating to the exact cause of the fire. Again, all that can be stated is that the area of most intense burn was in the left rear corner of the engine compartment, immediately surrounding the brake master cylinder.

RESEARCH OF RECALL INFORMATION

We contacted the National Highway Traffic Safety Administration (NHTSA) to identify any preliminary evaluations, engineering analyses, or recalls on 2001 Ford Expedition vehicles.

At this time, a search of their records, as well as technical service bulletins, indicated no information relating to the claim as described.

RECOMMENDATIONS

We recommend that the 2001 Ford Expedition vehicle be retained, secured, and protected regarding any further testing or inspection by other interested parties. We also reserve the right to be present and observe any and all inspections or testing of this Ford Expedition vehicle by any other concerned parties.

IV. BASIS OF REPORT

This report is based upon the following:

1. Inspection of the 2001 Ford Expedition vehicle.
2. Interview with the insured.
3. Researched recall information.
4. Information and observations as noted in this report.

V. ATTACHMENTS

PHOTOGRAPHS

Photos

1. Overview of the front of the house prior to looking at any of the fire debris piles.

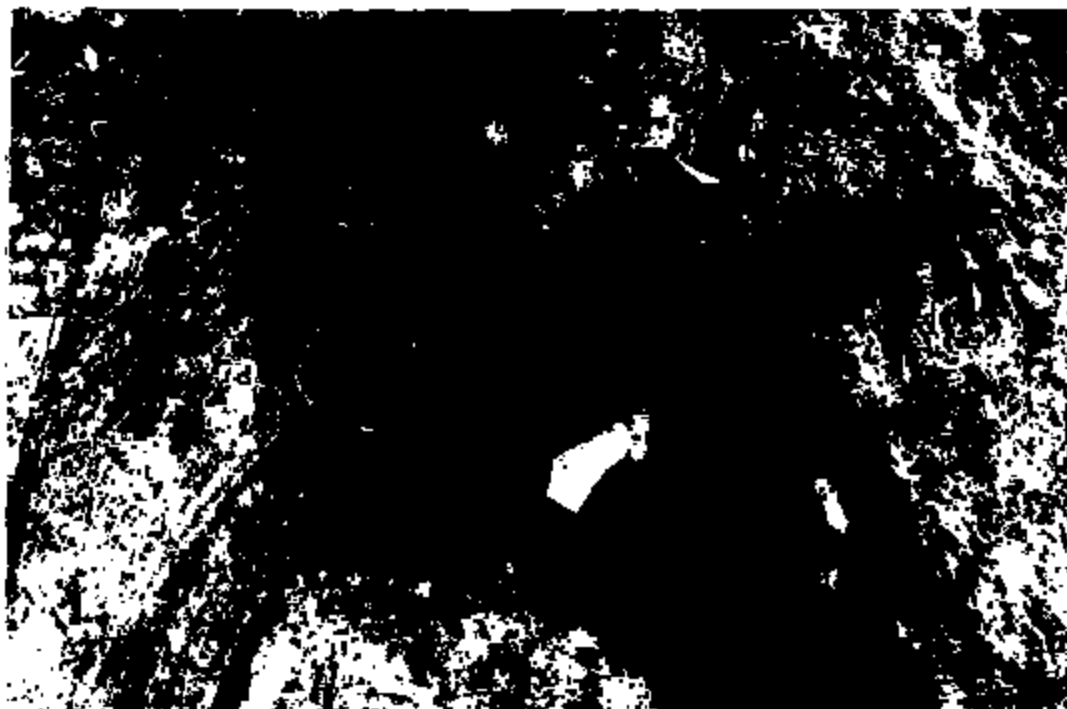


2. View of the pile closest to the street.



EXOS-005-LC-1000

3. View of the pile that would have been where the left rear tire and wheel assembly were situated.



4. View of the pile that was immediately below the engine compartment, closest to the garage.



2005-007-1-C-1000

5. Closer view of what appears to be the burned and deformed remains of a portion of the brake master cylinder.



6. Front view of the Ford vehicle.



ENC-208-LC-1081

7. Left-side view of the Ford vehicle.



8. Right-side view of the Ford vehicle.



ENC-805-LC-1092

WAFB-TV 10

9. Rear view of the Ford vehicle.



10. View of the damage imposed on the left front door panel, likely as the result of firefighter efforts.



2005-005-LC-1003

11. Overview of the third, or rear-most, interior bench seat. Please note the unconsumed foam material on this rear bench seat.



12. Overview of the burn experienced by the middle interior bench seat. Please note more foam material was consumed.



ENG-085-LC-1894

13. Overview of the skeletal remains of the front two (2) bucket seats.



14. Overview of the vehicle dash as viewed from the right.



Q103-885-10-1000

15. Overview of the severely burned steering column as viewed from the right.



16. Overview of the burned fallen remains below the steering column. Please note the driver's side airbag assembly immediately neighboring the fallen stereo.



2001-01-08-0000

17. View of the fallen center third dash mounted OEM (Original Equipment Manufacturer) stereo.



18. Overview of the vehicle dash as viewed from the left. Please note the partially consumed heater core.



ENG-000-LC-1097

19. Closer view of the partially consumed heater core, only on the top and right-hand side.



20. Overview of the engine compartment.



ENG-001-LC-1000

21. View of the engine compartment as viewed from the left.



22. View of the engine compartment as viewed from the right.



ENG-005-LO-1000

23. Overview of the right half of the engine compartment as viewed from the front.



24. Overview of the left half of the engine compartment as viewed from the front.



ENG-003-1-C-1100

25. Overview of the partial consumption of the left side of the timing chain cover.



26. Overview of the front of the engine.



ENG-001-LC-1101

Overview of the top of the engine as viewed from the front.



28. Overview of the area surrounding the consumed brake master cylinder.

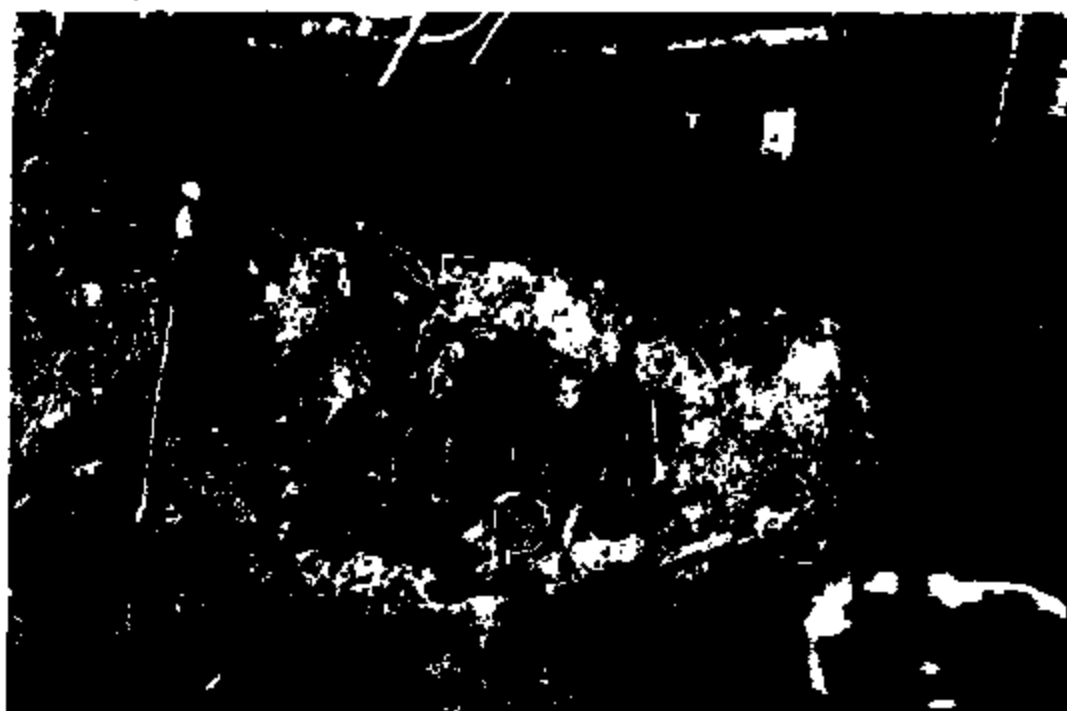


ENG-005-LC-1102

29. Front view of the power distribution center in the left rear corner of the engine compartment.



30. Top view of the power distribution center as viewed from the left.



DNB-BOS-LC-1163

31. Overview of the right-side, fiberglass composite, engine valve cover.



32. Overview of the much more severely burned and partially consumed left-side engine valve cover.



DN00-000-LE-1104

Form 870 (10/03)

HARRIS COUNTY FIRE & EMERGENCY SERVICES
REQUEST FOR INCIDENT INFORMATION

FAX: 281-931-5874

TODAY'S DATE: 7/15/04

Info Only

PLEASE PROVIDE INFORMATION REGARDING THE FIRE OR EXPLOSION:

DATE OF INCIDENT: 7/14/04ADDRESS OF INCIDENT: Court SpringYOUR NAME: [REDACTED]YOUR ADDRESS: Houston TX

YOUR PHONE NUMBER: EMPLOYMENT

HOME

FAX

CHECK ONE

☐ OWNER OF PROPERTY☐ TENANT☒ INSURANCE ADJUSTER/INVESTIGATOR REPRESENTING Allstate☐ ATTORNEY REPRESENTING☐ OTHER (STATE RELATIONSHIP)INSURANCE INFORMATION: POLICY # [REDACTED] CLAIM # [REDACTED]FULL NAME OF INSURANCE COMPANY: Allstate Insurance Co.ADDRESS OF PEOPLE'S OF INSURANCE CO: 16700 E. Hardy Houston 77032AMOUNT OF COVERAGE ON BUILDING: [REDACTED]CONTENTS: [REDACTED]SIGNATURE OF PERSON RECEIVING REPORT: [Signature]

For HCFMS Use Only

INFORMATION RELEASED:

QUANTITY	ITEM	DESCRIPTION	AMOUNT EACH	TOTAL ITEM
	Photographs	3 x 5	\$1.00	
	Photographs	3 x 7	\$5.00	
	Photographs	8 x 10	\$9.00	
	Photos on CDROM		\$24.00	
	Public Report			
	Detail Report			
	Fire Department Rpt			

Receipt number: [REDACTED]TOTAL FEE: [REDACTED]REMARKS: [REDACTED]FIRE SIGNATURE RELEASING INFORMATION ABOVE: [REDACTED]

(Signature)

1/1 8. 502 ON

201-515-5349

JUL 15 2004 2:42PM

A BASE 07 14 2004 879 0414911 000 FIRE # DATE OF INCIDENT TIME OF INCIDENT REPORT #		<input type="checkbox"/> Police <input type="checkbox"/> Fire <input type="checkbox"/> Other Activity		WFLS -1 Radio
B Locations <input type="checkbox"/> Check this box to indicate that the address is not correct or that the address is not the correct one. <input checked="" type="checkbox"/> Street address <input type="checkbox"/> Intersection <input type="checkbox"/> In front of <input type="checkbox"/> Near of <input type="checkbox"/> Adjacent to <input type="checkbox"/> Directions Address/Location: Spring				
C Incident Type * 131 Passenger vehicle fire 1 Aid Given or Received: 1 <input type="checkbox"/> Medical aid rendered 2 <input type="checkbox"/> Automatic aid given 3 <input type="checkbox"/> Manual aid given 4 <input type="checkbox"/> Automatic aid given 5 <input type="checkbox"/> Other aid given 6 <input type="checkbox"/> None		D Date & Times Incident began at: 07 14 2004 05:26:44 Arrival at: 07 14 2004 05:32:00 Controlled: 07 14 2004 06:00:00 Last Unit: 07 14 2004 06:27:23		E Shift & Alarm Local Alarm: 071 Alarm: 071 Alarm: 071
F Actions Taken * 11 Extinguish Primary Action Taken (1) Additional Action Taken (2) Additional Action Taken (3)		G Resources * <input checked="" type="checkbox"/> Check this box and skip this section if no resources were used. Resources: 0002 0008 Other: 0000 <input type="checkbox"/> Check box if additional resources were used.		H Estimated Dollar Losses & Values Losses: Reported for all items if known, optional. Property: 030 000 Contents: 001 000 Property: 030 000 Contents: 001 000
I Completed Modules <input checked="" type="checkbox"/> Fire-2 <input type="checkbox"/> Structure-3 <input type="checkbox"/> Civil Fire Gas-4 <input type="checkbox"/> Fire Serv. Gas-5 <input type="checkbox"/> Fire-6 <input type="checkbox"/> Fire-7 <input type="checkbox"/> Wildland Fire-8 <input type="checkbox"/> Apparatus-9 <input type="checkbox"/> Personnel-10 <input type="checkbox"/> Alarm-11		J Casualties Deaths: 0 Injuries: 0 Property: 0 Other: 0		K Hazardous Materials Release <input type="checkbox"/> None <input type="checkbox"/> Natural Gas: 0 <input type="checkbox"/> Propane Gas: 0 <input type="checkbox"/> Gasoline: 0 <input type="checkbox"/> Kerosene: 0 <input type="checkbox"/> Diesel Fuel: 0 <input type="checkbox"/> Household Solvents: 0 <input type="checkbox"/> Motor Oil: 0 <input type="checkbox"/> Paints: 0 <input type="checkbox"/> Other: 0
L Property Use 131 Church, place of worship 141 Restaurant or cafeteria 142 Bar/ Tavern or nightclub 213 Elementary school or kindergarten 215 High school or junior high 241 College, adult education 311 Care facility for the aged 331 Hospital		M Structure 341 Clinic, clinic type infirmary 342 Dentist/ dentist office 381 Prison or jail, not juvenile 413 1-2 family dwelling 423 3-4 family dwelling 433 5-9 family dwelling 443 Commercial retail or retail 453 Residential, board and care 464 Sanitary/hallways 513 Food and beverage sales 534 Vacant lot 538 Graded/care for plot of land 546 Lake, river, stream 551 Ballfield, sports field 560 Other street 561 Highway/divided highway 562 Residential street/driveway		N Mixed Use Property <input type="checkbox"/> Not mixed <input type="checkbox"/> Assembly use <input type="checkbox"/> Education use <input type="checkbox"/> Medical use <input type="checkbox"/> Residential use <input type="checkbox"/> Shop or storage <input type="checkbox"/> Enclosed walk <input type="checkbox"/> Bus, & Residential <input type="checkbox"/> Office use <input type="checkbox"/> Industrial use <input type="checkbox"/> Military use <input type="checkbox"/> Farm use <input type="checkbox"/> Other mixed use
O Outside 134 Playground or park 558 Cross or crosswalk 559 Swamp (marshland) 567 Outdoor storage area 513 Dump or sanitary landfill 531 Open land or field		P Vehicle 539 Household goods, sales, repairs 579 Motor vehicle/boat sales/repairs 571 Gas or service station 599 Business office 613 Electric generating plant 623 Laboratory/warehouse lab 700 Manufacturing plant 813 Livestock/poultry storage (barn) 882 Non-residential parking garage 891 Warehouse 981 Construction site 984 Industrial plant yard		

KA554 <small>FILE #</small>	TX <small>State</small>	07 <small>MONTH</small>	14 <small>DAY</small>	2004 <small>YEAR</small>	575 <small>SECTION</small>	000 <small>EXPANSION #</small>	<input type="checkbox"/> Relate <input type="checkbox"/> Change <input type="checkbox"/> As Activity	SPR-2 <small>FORM</small>
A Property Details				C On-Site Materials or Products <small>Enter up to three codes. Check one or more boxes for each code entered.</small> <small>On-site material (1)</small> <input type="checkbox"/> <small>(2)</small> <input type="checkbox"/> <small>(3)</small> <input type="checkbox"/> <small>(4)</small> <input type="checkbox"/> <small>On-site material (1)</small> <input type="checkbox"/> <small>(2)</small> <input type="checkbox"/> <small>(3)</small> <input type="checkbox"/> <small>(4)</small> <input type="checkbox"/> <small>On-site material (1)</small> <input type="checkbox"/> <small>(2)</small> <input type="checkbox"/> <small>(3)</small> <input type="checkbox"/> <small>(4)</small> <input type="checkbox"/>				
B1 <input type="checkbox"/> 0001 <input type="checkbox"/> Not Residential <small>Estimated number of residential living units in building or origin whether or not all units equally involved</small>				B2 <input type="checkbox"/> 001 <input type="checkbox"/> Buildings not involved <small>Number of buildings involved</small>				
B3 <input type="checkbox"/> None <small>Area involved</small> <small>(Outside Street) <input type="checkbox"/> Does this one apply</small>				B4 <input type="checkbox"/> 002 <input type="checkbox"/> Buildings not involved <small>Number of buildings involved</small>				
D Ignition				E1 Cause of Ignition <input type="checkbox"/> Check box if this is a separate report. <input type="checkbox"/> 1 <input type="checkbox"/> Intentional <input type="checkbox"/> 2 <input type="checkbox"/> Mistaken <input type="checkbox"/> 3 <input type="checkbox"/> Failure of equipment or heat source <input type="checkbox"/> 4 <input type="checkbox"/> Act of terror <input type="checkbox"/> 5 <input type="checkbox"/> Causes under investigation <input type="checkbox"/> 6 <input type="checkbox"/> Causes under investigation				
D1 <input type="checkbox"/> 03 <input type="checkbox"/> Engine start, running <small>Area of fire origin</small>				E2 Factors Contributing To Ignition <input type="checkbox"/> 1 <input type="checkbox"/> Electrical <small>Factor contributing to ignition (1)</small> <input type="checkbox"/> <small>(2)</small> <input type="checkbox"/> <small>(3)</small> <input type="checkbox"/> <small>(4)</small> <input type="checkbox"/> <small>(5)</small> <input type="checkbox"/> <small>(6)</small> <input type="checkbox"/> <small>(7)</small> <input type="checkbox"/> <small>(8)</small> <input type="checkbox"/> <small>(9)</small> <input type="checkbox"/> <small>(10)</small>				
D2 <input type="checkbox"/> 11 <input type="checkbox"/> Spark, ember or flame <small>Area of fire origin</small>				E3 Human Factors Contributing To Ignition <input type="checkbox"/> 1 <input type="checkbox"/> Relay <input type="checkbox"/> None <input type="checkbox"/> 2 <input type="checkbox"/> Electrically ignited by electrical or device <input type="checkbox"/> 3 <input type="checkbox"/> Unattended person <input type="checkbox"/> 4 <input type="checkbox"/> Unattended electrical device <input type="checkbox"/> 5 <input type="checkbox"/> Unattended electrical device <input type="checkbox"/> 6 <input type="checkbox"/> Unattended electrical device				
D3 <input type="checkbox"/> 00 <input type="checkbox"/> Item first ignited <small>Area of fire origin</small> <input type="checkbox"/> 1 <input type="checkbox"/> Was caused by object of weight				E4 Estimated age of person involved <input type="checkbox"/> 1 <input type="checkbox"/> Male <input type="checkbox"/> Female				
D4 <input type="checkbox"/> 00 <input type="checkbox"/> Type of material first <small>Type of material first ignited</small> <input type="checkbox"/> 1 <input type="checkbox"/> Was caused by object of weight				E5 Fire Suppression Factors <small>Enter up to three codes.</small> <input type="checkbox"/> None <small>Fire suppression factor (1)</small> <input type="checkbox"/> <small>(2)</small> <input type="checkbox"/> <small>(3)</small> <input type="checkbox"/> <small>(4)</small> <input type="checkbox"/> <small>(5)</small> <input type="checkbox"/> <small>(6)</small> <input type="checkbox"/> <small>(7)</small> <input type="checkbox"/> <small>(8)</small> <input type="checkbox"/> <small>(9)</small> <input type="checkbox"/> <small>(10)</small>				
F1 Equipment Involved In Ignition <input type="checkbox"/> None <input type="checkbox"/> Equipment was not involved, ship to separate G <small>Equipment involved</small>				F2 Equipment Power <input type="checkbox"/> 1 <input type="checkbox"/> Portable <input type="checkbox"/> 2 <input type="checkbox"/> Stationary <small>Portable equipment normally can be moved by one person, is designed to be used in multiple locations, and requires no tools to install.</small>				
F3 Equipment Portability <input type="checkbox"/> 1 <input type="checkbox"/> Portable <input type="checkbox"/> 2 <input type="checkbox"/> Stationary				G Long Use <input type="checkbox"/> Two-Fire Flag Available <small>Area of the information contained in this report may be based upon reports from other sources</small> <input type="checkbox"/> Area report attached <input type="checkbox"/> Police report attached <input type="checkbox"/> Owner report attached <input type="checkbox"/> Other reports attached				
H1 Mobile Property Involved <input type="checkbox"/> None <input type="checkbox"/> Involved in ignition, not burned <input type="checkbox"/> Involved in ignition, not burned <input type="checkbox"/> Involved in ignition and burned				H2 Mobile Property Type & Make <input type="checkbox"/> 11 <input type="checkbox"/> Passenger car <small>Mobile property type</small> <input type="checkbox"/> 10 <input type="checkbox"/> Ford <small>Mobile property make</small>				
I Expansion <small>Mobile property model</small>				J Year 2001				

A		MO		DA		YYYY		TIME		INCIDENT NUMBER		REPORT #		STATUS		APPARATUS OF LOCATION	
KAS54		TX		7		14		2004		075		0414811		000		Delete	
FMS		State		California		Date		Time		Incident Number		Report #		Status		Apparatus of Location	
B Apparatus or Resource		Data and Times								Send	Number of People	Time	Actions Taken				
		Check to see if status is								<input type="checkbox"/>							
		Month Day Year Hour Min								<input type="checkbox"/>							
1	IN RT5	Dispatch	<input checked="" type="checkbox"/>	7	14	2004	03:25			<input checked="" type="checkbox"/>	3	Suppression	<input type="checkbox"/>	<input type="checkbox"/>			
	Type 13	Arrival	<input checked="" type="checkbox"/>	7	14	2004	03:32					MS	<input type="checkbox"/>	<input type="checkbox"/>			
		Clear	<input checked="" type="checkbox"/>	7	14	2004	04:27					Other	<input type="checkbox"/>	<input type="checkbox"/>			
2	IN 80V	Dispatch	<input checked="" type="checkbox"/>	7	14	2004	03:25			<input checked="" type="checkbox"/>	5	Suppression	<input type="checkbox"/>	<input type="checkbox"/>			
	Type 33	Arrival	<input checked="" type="checkbox"/>	7	14	2004	03:32					MS	<input type="checkbox"/>	<input type="checkbox"/>			
		Clear	<input checked="" type="checkbox"/>	7	14	2004	04:27					Other	<input type="checkbox"/>	<input type="checkbox"/>			
3	IN	Dispatch	<input type="checkbox"/>							<input type="checkbox"/>		Suppression	<input type="checkbox"/>	<input type="checkbox"/>			
	Type	Arrival	<input type="checkbox"/>									MS	<input type="checkbox"/>	<input type="checkbox"/>			
		Clear	<input type="checkbox"/>									Other	<input type="checkbox"/>	<input type="checkbox"/>			
4	IN	Dispatch	<input type="checkbox"/>							<input type="checkbox"/>		Suppression	<input type="checkbox"/>	<input type="checkbox"/>			
	Type	Arrival	<input type="checkbox"/>									MS	<input type="checkbox"/>	<input type="checkbox"/>			
		Clear	<input type="checkbox"/>									Other	<input type="checkbox"/>	<input type="checkbox"/>			
5	IN	Dispatch	<input type="checkbox"/>							<input type="checkbox"/>		Suppression	<input type="checkbox"/>	<input type="checkbox"/>			
	Type	Arrival	<input type="checkbox"/>									MS	<input type="checkbox"/>	<input type="checkbox"/>			
		Clear	<input type="checkbox"/>									Other	<input type="checkbox"/>	<input type="checkbox"/>			
6	IN	Dispatch	<input type="checkbox"/>							<input type="checkbox"/>		Suppression	<input type="checkbox"/>	<input type="checkbox"/>			
	Type	Arrival	<input type="checkbox"/>									MS	<input type="checkbox"/>	<input type="checkbox"/>			
		Clear	<input type="checkbox"/>									Other	<input type="checkbox"/>	<input type="checkbox"/>			
7	IN	Dispatch	<input type="checkbox"/>							<input type="checkbox"/>		Suppression	<input type="checkbox"/>	<input type="checkbox"/>			
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		Clear	<input type="checkbox"/>									Other	<input type="checkbox"/>	<input type="checkbox"/>			
8	IN	Dispatch	<input type="checkbox"/>							<input type="checkbox"/>		Suppression	<input type="checkbox"/>	<input type="checkbox"/>			
	Type	Arrival	<input type="checkbox"/>									MS	<input type="checkbox"/>	<input type="checkbox"/>			
		Clear	<input type="checkbox"/>									Other	<input type="checkbox"/>	<input type="checkbox"/>			
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	Type	Arrival	<input type="checkbox"/>									MS	<input type="checkbox"/>	<input type="checkbox"/>			
		Clear	<input type="checkbox"/>									Other	<input type="checkbox"/>	<input type="checkbox"/>			

Type of Apparatus or Resource

Ground Fire Suppression

- 11 Engine
- 12 Truck or aerial
- 13 Quilt
- 14 Tanker & power combination
- 15 Brush truck
- 17 AFD (aircraft rescue and firefighting)
- 18 Ground fire suppression, other

Heavy Ground Equipment

- 21 Dumper or plow
- 22 Tractor
- 24 Tanker or tender
- 28 Heavy equipment, other

Aircraft

- 41 Aircraft, fixed wing tanker
- 42 Helicopter
- 43 Helicopter
- 44 Aircraft, other

Marine Equipment

- 51 Fire boat with pump
- 52 Boat, no pump
- 53 Marine apparatus, other

Support Equipment

- 61 Breathing apparatus support
- 62 Light and air unit
- 63 Support apparatus, other

Medical & Rescue

- 71 Rescue unit
- 72 Deep Search & rescue unit
- 73 High angle rescue unit
- 74 Aid unit
- 75 Aid unit
- 76 Medical and rescue unit, other

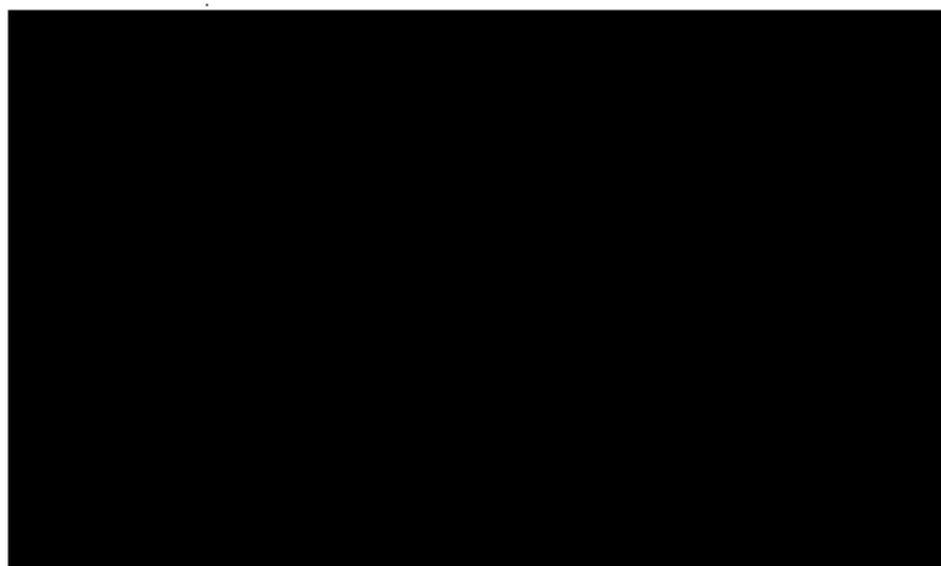
More Apparatus?
 Use Additional
 Sheets

Other

- 81 Mobile command post
- 82 Chief officer car
- 83 Ketchikan unit
- 84 Type 1 hand crew
- 85 Type 2 hand crew
- 86 Privately owned vehicle
- 87 Other apparatus/resource
- 88 None
- 89 Undetermined

HFIR-3 Revision 11/17/94

A		MM		D		YYYY		E75		0414221		000		<input type="checkbox"/> Delete <input type="checkbox"/> Change		07/23/07 - 10 2013551289			
B Apparatus or Resource		Date and Times						Sent		Number of People		Use		Actions Taken					
One more listed below		Check if seen at alarm area										Check OFF box for each apparatus on incident the only one at the scene		List up to 4 actions per each apparatus per team personnel.					
1 ID E75		Dispatch		7		14		2004		05:25		Sent		3		<input checked="" type="checkbox"/> Suppression <input type="checkbox"/> EMS <input type="checkbox"/> Other		<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	
Type 113		Arrival		7		14		2004		05:33									
		Clear		7		14		2004		05:27									
Personnel ID		Name						Rank or Grade		Attend		Action Taken		Action Taken		Action Taken		Action Taken	
0090		Fletcher, Matthew						FF		X									
0731		Weinast, Robert						LT		X									
0796		Blank, Dawson						SC		X									
2 ID E07		Dispatch		7		14		2004		05:25		Sent		3		<input checked="" type="checkbox"/> Suppression <input type="checkbox"/> EMS <input type="checkbox"/> Other		<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	
Type 02		Arrival		7		14		2004		05:32									
		Clear		7		14		2004		05:27									
Personnel ID		Name						Rank or Grade		Attend		Action Taken		Action Taken		Action Taken		Action Taken	
1026		Hunsberger, Glenn						FF		X									
5120		Anderson, Eric						DC		X									
6978		Gore, Steve						SC		X									
9986		Hammings, John						LT		X									
9244		Curry, Joseph						FF		X									
3 ID		Dispatch										Sent				<input type="checkbox"/> Suppression <input type="checkbox"/> EMS <input type="checkbox"/> Other		<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	
Type		Arrival																	
		Clear																	
Personnel ID		Name						Rank or Grade		Attend		Action Taken		Action Taken		Action Taken		Action Taken	
										<input type="checkbox"/>									
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										<input type="checkbox"/>									
										<input type="checkbox"/>									





Office of the General Counsel

PRIVILEGED & CONFIDENTIAL

Ford Motor Company
Parklane Towers West
Suite 300
Three Parklane Boulevard
Dearborn, Michigan 48128-2508

January 14, 2005

Allstate Insurance
16700 East Hardy, Suite A
Houston, TX 77032
ATTENTION: LAURA VILLARREAL

2005

Re: Claimant: [REDACTED]
D/O/E: 10-28-2004
Your Claim #: [REDACTED]

RECEIVED JAN - 1 2005

Dear Ms. Villarreal:

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. **NOT AVAILABLE**
- ☒ 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.

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: NA NEDERLAND TEXAS ✓
- 10. The 17 digit vehicle identification number: NA 1FTDX1366VN [REDACTED] ✓
- 11. What was the mileage at time of occurrence: 235,200
- 12. What is the alleged defect:
FIRE ORIGINATED AT THE BRAKE PRESSURE SWITCH

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)?
OWNER [REDACTED] RETAINED SALVAGE; [REDACTED] V. DOR, TX [REDACTED]
15. List all after market additions or modifications that were made to the vehicle:
SATELLITE RADIO
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: PURCHASED FROM INDIVIDUAL; APPROX \$5000-\$5500;

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.

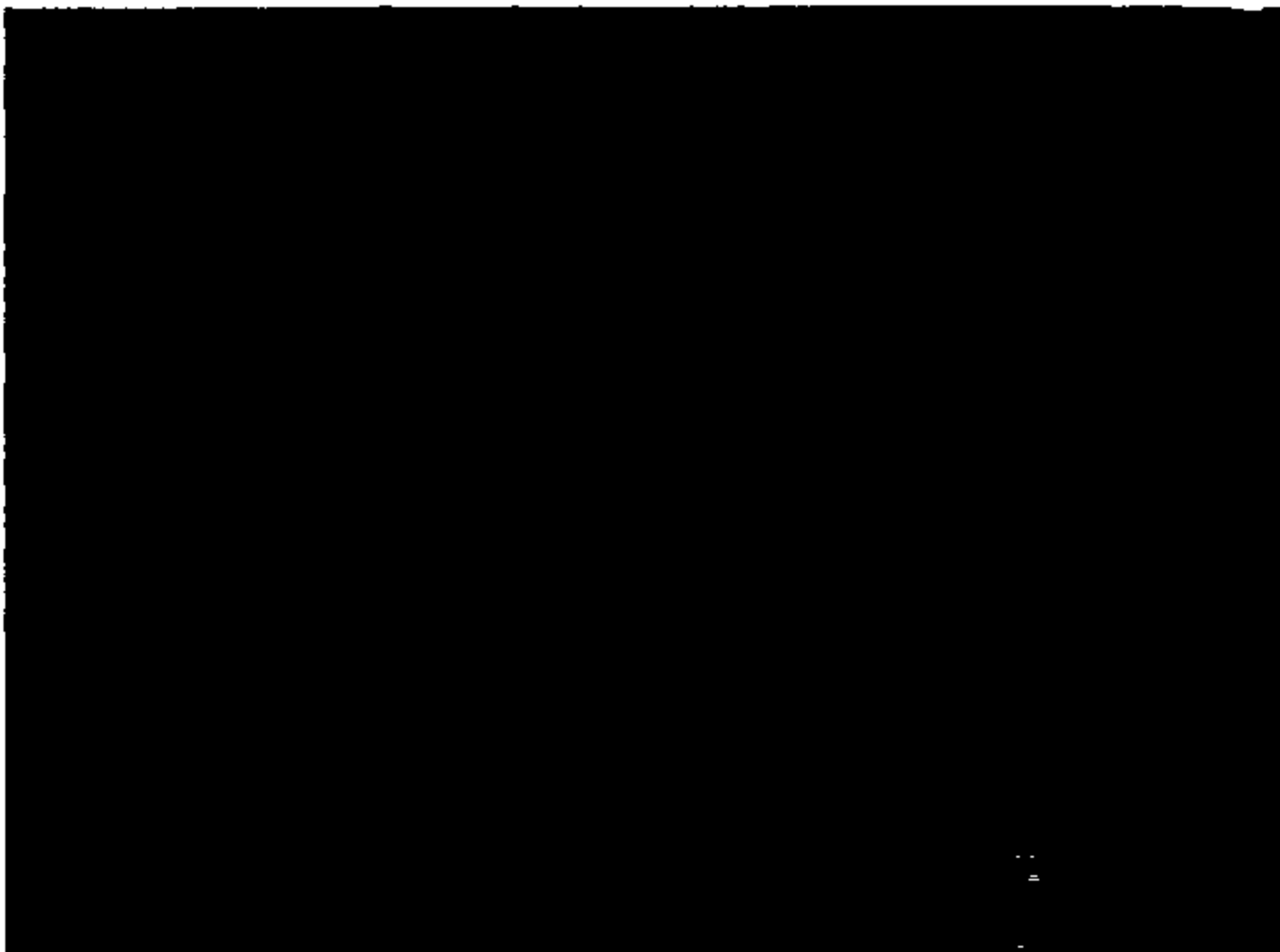
Please be advised that all necessary steps should be taken to ensure that the subject vehicle and all of its component parts are maintained and preserved for trial. Ford Motor Company has the right to inspect the vehicle and remove and test any component part that you claim to be defective, and to be 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,

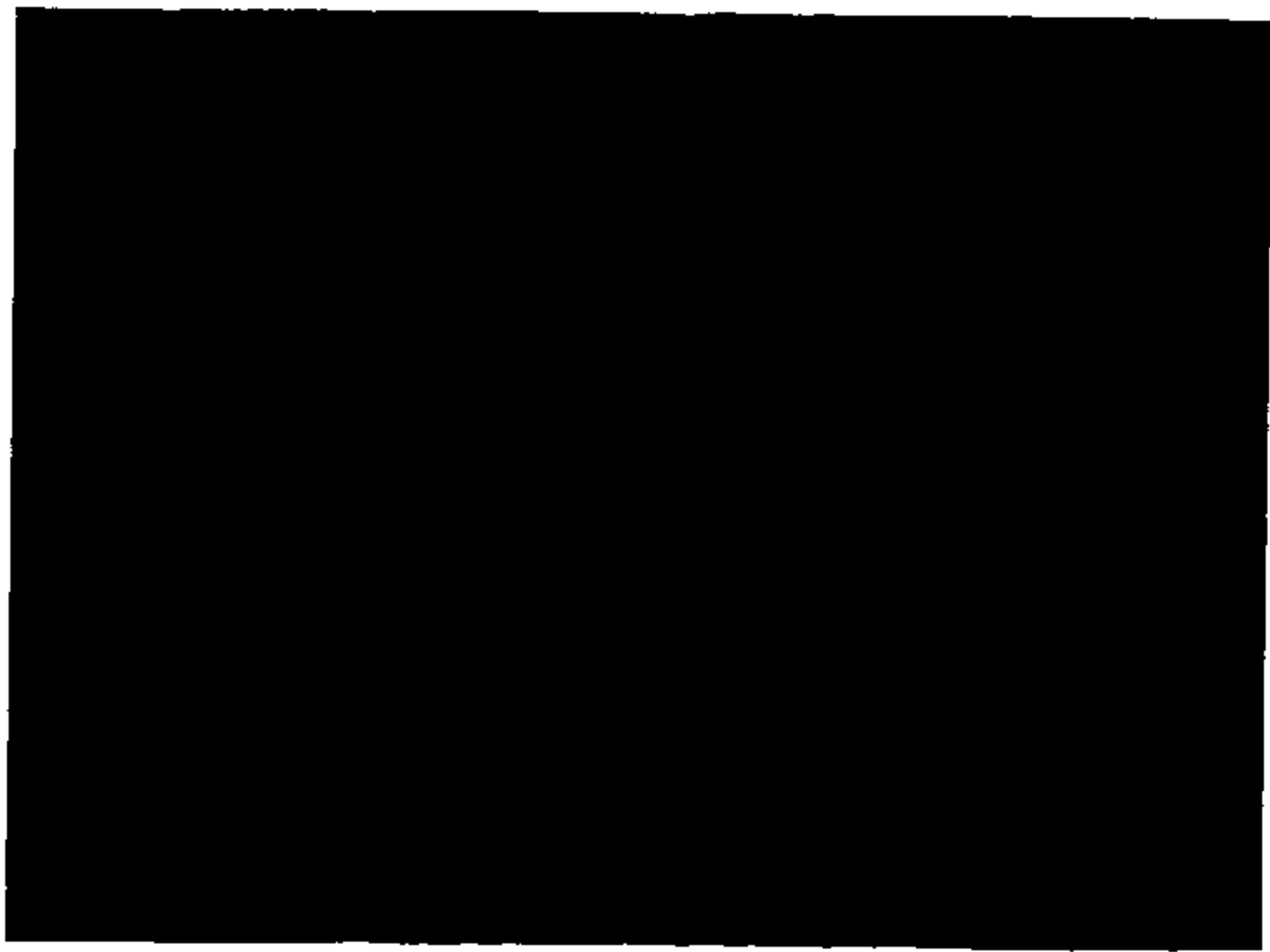


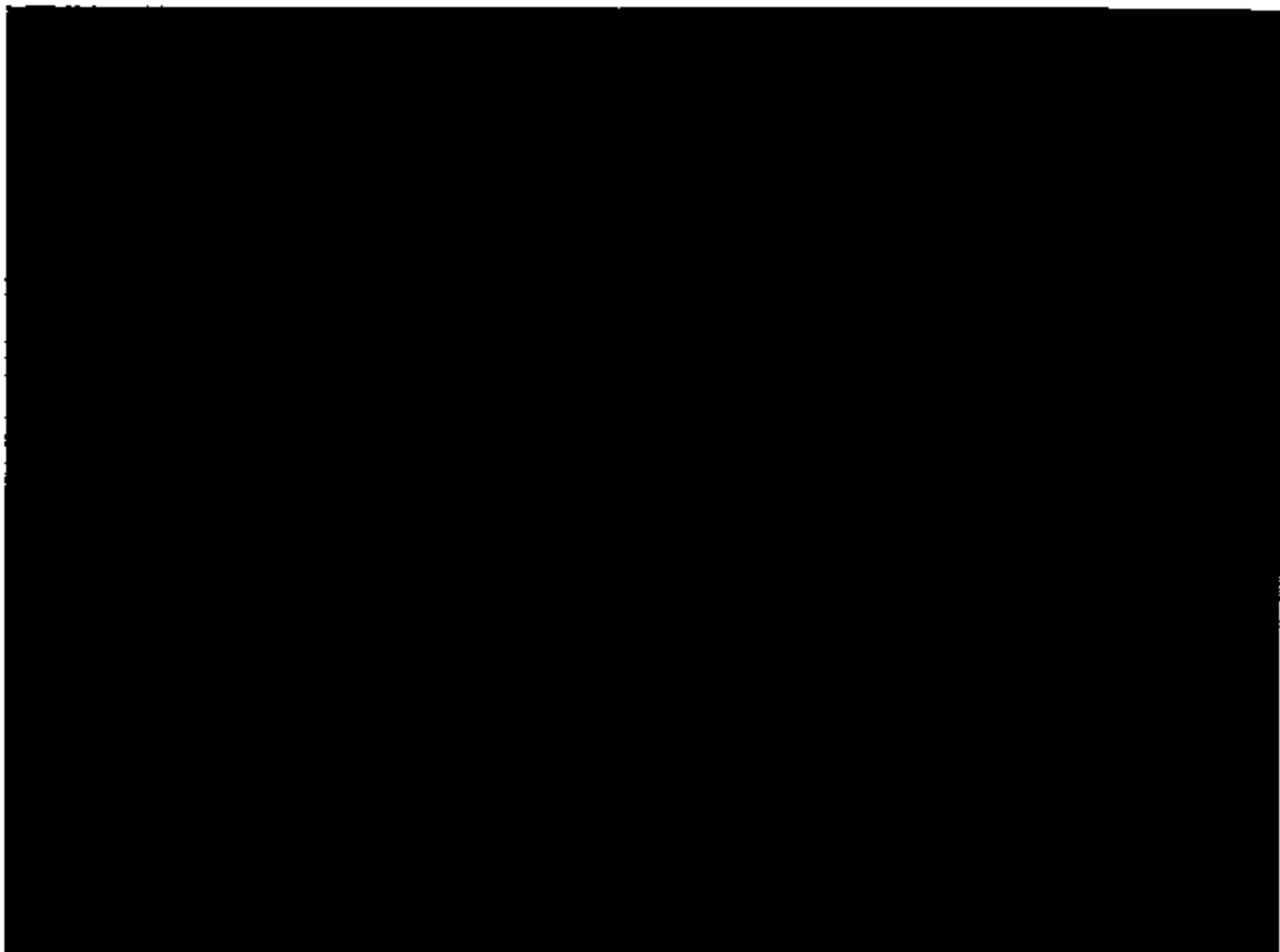
Shawn L. Norton
Claims Analyst /
Litigation Assistant

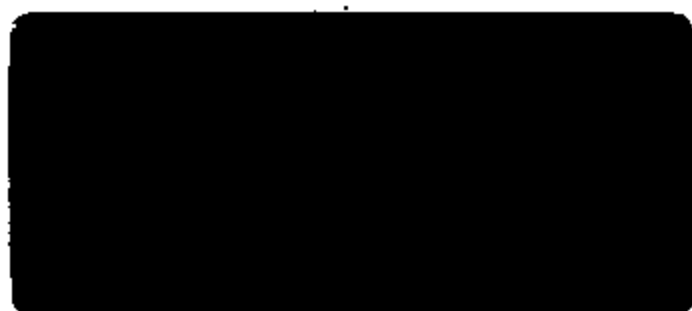




EP85-085-LC-1114







RIMKUS
CONSULTING GROUP, INC.



Rinkus Consulting Group, Inc.
Eight Greenway Plaza, Suite 500
Houston, Texas 77046
(713) 621-3680 Telephone
(713) 623-4357 Facsimile
(800) 580-3228 Toll Free

Report of Findings

1997 FORD F-150 VEHICLE FIRE CAUSE & ORIGIN

OWNER/INSURED: [REDACTED]

Claim No: [REDACTED]

File No: 105864

Prepared For:

**ALLSTATE INSURANCE COMPANY
16700 EAST HARDY, SUITE A
HOUSTON, TEXAS 77032**

Attention:

MRS. LAURA VILLARREAL

**Thomas W. Bender, C.F.E.I., C.V.F.I.
Project Fire Consultant**

**M.L. "Buddy" Jenkins, C.F.I., C.F.E.I.
Fire Division Manager**

January 4, 2005

ER05-005-LC-1118

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II. Conclusions.....	2
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C. CVs	

January 4, 2005

ER25-825-LC-1119

Section I
INTRODUCTION

On October 28, 2004, a 1997 Ford F-150 pickup truck caught fire while at Parker Lumber, located at [REDACTED] City Highway in Nederland, Texas. The truck was owned and insured by [REDACTED]. The fire was reported to emergency dispatch with the Nederland Fire Department responding, but employees of Parker Lumber extinguished the fire prior to fire department arrival.

Rimkus Consulting Group, Inc. was retained on October 30, 2004 by Mrs. Laura Villarreal of Allstate Insurance Company to determine the origin and cause of the fire. Our work to complete this assignment was conducted by Thomas W. Bander, C.F.E.I. and C.V.F.I.

This report was prepared for the exclusive use of Allstate Insurance Company and is not intended for any other purpose. Our report is based on the information available to us at this time as described in Section IV, **Basis of Report**. Should additional information become available, we reserve the right to determine the impact, if any, the new information has on our opinions and conclusions, and to revise our opinions and conclusions if necessary and warranted.

Section II

CONCLUSIONS

1. The fire originated within the engine compartment on the left driver side at the forward end of the master cylinder.
2. Based on burn patterns and examined evidence, the fire originated at the brake pressure switch located on the forward top side of the brake master cylinder.
3. The brake pressure switch is designed to be protected by fuse circuit 13 with a 15 amp fuse, but was improperly protected by a 25 amp fuse.
4. Fuse circuit 13 is energized at all times. Heat from a short circuit inside the brake pressure switch ignited the brake fluid that had leaked by the internal diaphragm.
5. The fire is determined to be accidental in nature.

Section III

DISCUSSION

On November 2, 2004, the damaged remains of a beige 1997 Ford F-150, located at Parker Lumber, [REDACTED] Highway in Nederland, Texas, were inspected. The Vehicle Identification Number of 1FTDX1766VN [REDACTED] located on the driver doorjamb sticker and dash plate, identified the vehicle as well as the Texas license plate bearing [REDACTED]. The vehicle was manufactured in March 1996 as a 2WD Ford F-150 XLT with a Triton V8-281 hp 4.6L gasoline engine with an automatic transmission. Actual vehicle mileage on the odometer read 235,200. The wheels were matched Firestone Wilderness AT tires mounted on factory rims with excellent tread depth.

Exterior examination revealed no fire or heat damage to the body panels of the vehicle. The glass of the passenger cabin was all intact and contained no smoke staining. Slight fire and heat damage was noted within the forward left driver side wheel well with evidence of an advancing fire from the engine compartment. The plastic cover located below the windshield was damaged by fire and heat with increasing damage toward the driver side. (Photograph series 1).

The undercarriage of the vehicle, from the back towards the front axle, showed no signs of mechanical damage. No oil leak was present in the rear of the vehicle, either from the rear brakes or the rear axle. No fire or mechanical damage was noted to the fuel fill neck and gasoline tank. The forward portion of the vehicle undercarriage revealed slight fire damage on the left driver side.

Interior examination of the vehicle no smoke or fire and heat damage throughout the passenger cabin. The dash assembly was completely intact with no fire or heat damage. The passenger side footboard contained no evidence of fire damage. The electrical components installed in the central dash were all intact and showed no indication of fire or heat damage. The steering column, instrument cluster and lower portion of the driver side dash contained no evidence of fire or heat damage. No fire

damage was noted near the steering and acceleration component holes in the bulkhead. (Photographs 2 through 4).

The under dash fuse panel, referred to as the central junction box, showed no evidence of fire or heat damage and was visually examined for fuse continuity. Examination of the fuses revealed all were closed. All fuses were properly sized when compared to the vehicle owner's manual and ALLDATA except fuse circuit 13. The fuse circuit 13 recommended fuse rating is 15 amps, while a 25 amp fuse had been installed. Fuse circuit 13 protected the rear anti-lock brake system module, brake on/off switch and the brake pressure switch.

Examination of the engine compartment revealed the use of a dry chemical fire extinguishing agent to extinguish the fire. The right passenger side of the engine compartment showed little evidence of fire or heat damage. All hoses, belts and electrical connections were intact with no evidence of fire damage. Fire and heat damage increased in severity toward the left driver side centrally located around the master cylinder attached to the brake booster. Fire extension was noted to slightly affect the engine compartment fuse block, completely consume the brake fluid reservoir attached to the top side of the master cylinder and extend to the plastic cover mounted below the windshield as mentioned previously. The master cylinder was intact and contained fire damage indicating more fire damage toward the forward portion at the location of the brake pressure switch. The complete remains of the brake pressure switch remained attached to the master cylinder while the brake fluid reservoirs were burned away. These remains were documented and remain with the vehicle in the engine compartment for further examination in the future, if required. (Photographs 6 and 7).

Fire burn patterns indicate the origin of the fire to be the forward portion of the master cylinder at the brake pressure switch. The brake pressure switch was found to contain fire damage within what would have been a protected switch enclosure indicating an electrical failure and not damage from an approaching fire. In this vehicle, the brake pressure switch is energized at all times unless the fuse for its circuit opens. A mode of failure for this particular component is that the diaphragm between the brake system and the electronic portion of the switch begins to leak. The brake fluid contaminates the

electrical contacts and causes corrosion and deterioration of the electrical contacts until they begin to short. The failure can cause intermittent problems with the brake, cruise control and shifter release systems. It may also cause an opening of the fuse in the under-dash circuit 13 or an overheating of the switch and ignition of the leaking brake fluid by the electrical arcing. Due to the overrated fuse in circuit 13, the fuse was unable to open and protect the switch. (Photographs 8 and 9).

No defects, recalls, or technical bulletins were found at the ALLDATA or the NHTSA websites. The ALLDATA website provided the fuse circuit diagram for fuse circuit 13.

██████████ reported to have purchased the vehicle from his brother, ██████████ in November 2002. He reported the cruise control had not worked for over a year prior to the fire. Approximately two to three weeks prior to the fire the transmission shift lever stuck in park. A fuse was changed, position unknown, by an unknown person in the under dash fuse panel. The brake light was reported to be illuminated in the instrument cluster prior to the fire. ██████████ reported to have driven to work and left the vehicle parked near the building for approximately an hour. A co-worker went outside to wash a company vehicle and noticed smoke from the engine compartment. At least three portable fire extinguishers were used to extinguish the fire while the fire department was called. The fire was extinguished prior to the fire department arrival.

Based on the burn patterns and examined evidence, this fire is determined to be accidental in nature caused by a malfunction of the brake pressure switch on the master cylinder in the rear left driver side of the engine compartment. A failure of the brake pressure switch allowed brake fluid to leak into the energized electrical contacts and combust resulting in nearby combustible materials to ignite prior to extinguishment. The fuse circuit was improperly protected with a 25 amp fuse and had been installed by an unknown person. The brake pressure switch is mostly intact and attached to the vehicle if further examination is required by interested parties.

Section IV

BASIS OF REPORT

1. The vehicle was examined and photographed on November 2, 2004.
2. [REDACTED] owner and insured, provided information concerning the vehicle and fire incident.
3. [REDACTED], brother of [REDACTED] and previous owner of the vehicle, provided history information concerning the vehicle.
4. The vehicle owner's manual was referenced for the manufacturer's recommended fuse circuit ratings.
5. ALldata was referenced for the manufacturer's recommended fuse circuit ratings.
6. ALldata and NHTSA websites were reviewed for recall and technical bulletin information concerning this fire scenario.

Section V
ATTACHMENTS

ENCLOSURE

January 4, 2005

Page 7

EROS-005-LC-1128

Section V
ATTACHMENT A

Photographs

Photographs taken during an inspection that are not included in this report are retained in our files and are available upon request.

PHOTOGRAPH SERIES 1:

Images of the exterior of 1997 Ford F-150 (VIN 1FTDX1766VN [REDACTED]) No fire damage noted.



PHOTOGRAPH SERIES 2:

Interior passenger compartment with no fire or smoke damage.



EXOS-005-LC-1128

PHOTOGRAPH 3:

Instrument cluster with no fire or heat damage.



PHOTOGRAPH 4:

No fire damage was noted on the driver side foot well at the openings in the bulkhead.



ENC-885-LC-1128

PHOTOGRAPH 5:

Slight fire and heat damage was noted within the driver side wheel well extending from the engine compartment.



PHOTOGRAPH 6:

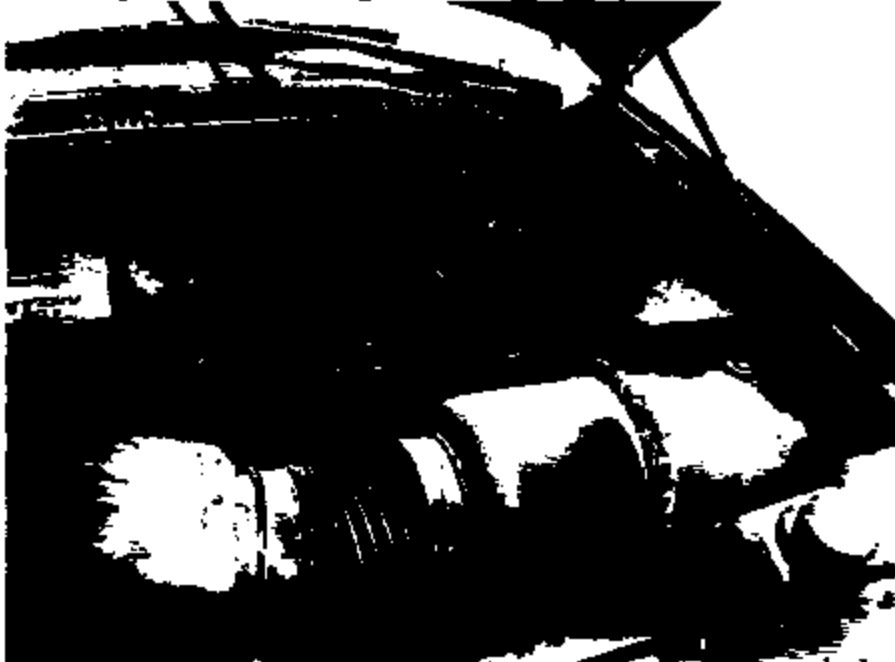
The right passenger side of the engine with slight fire or heat damage.



ENR-005-LC-1120

PHOTOGRAPH 7:

Increasing fire and heat damage to the engine components in the direct vicinity of the master cylinder. Fire damage extending to the plastic cover below the windshield.



PHOTOGRAPH 8:

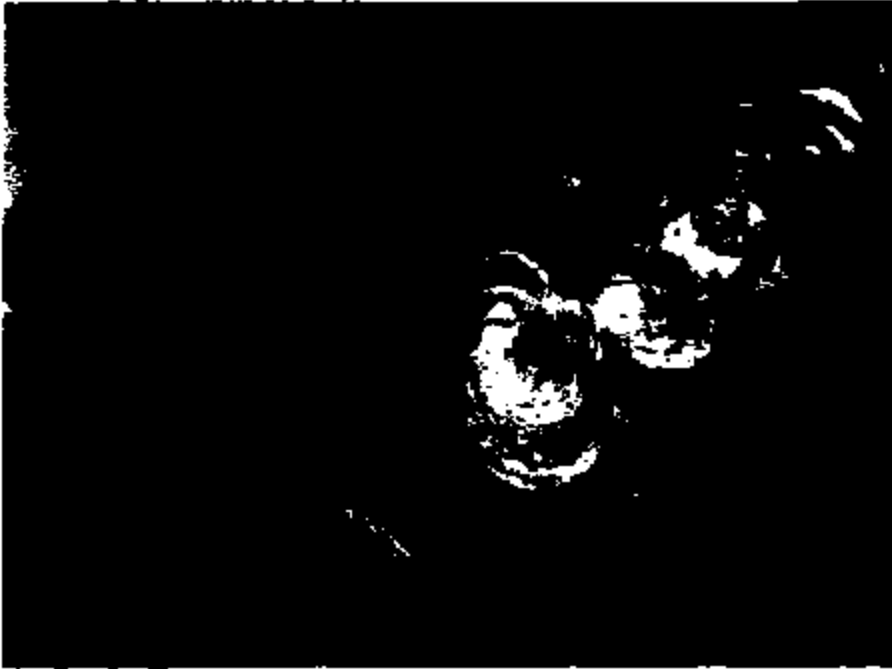
Detail image of the master cylinder and the top/forward mounted brake pressure switch.



2703-003-LC-1131

PHOTOGRAPH 9:

Detail image of the brake pressure switch with internal failure.



2011-07-10-1132

Section V
ATTACHMENT B



ALLDATA Wiring Diagram for Fuse Circuit 13



Section V
ATTACHMENT C

CVs



THOMAS W. BENDER, B.S., C.F.E.I.
PROJECT FIRE CONSULTANT

Mr. Bender graduated from Oklahoma State University with a Bachelor of Science degree in Fire Protection and Safety Engineering Technology. Mr. Bender's specific areas of experience include fire and life safety inspections, and design and testing of fire sprinkler and fire alarm systems for residential and commercial premises.

Primary areas of consultation include fire origin and cause, fire code and fire protection system review, fire analysis, fire modeling, research and testing. Associated areas include hydraulic calculation and inspection of sprinkler systems for all new construction, as well as post-fire examination for sprinkler system performance, and inspection and proper maintenance of fire prevention equipment.

Mr. Bender has experience as a volunteer firefighter with several volunteer fire departments in Georgia and North Carolina. He is familiar with the purpose and use of all personal fire protection equipment. He has worked for the Georgia State Fire Marshal's office. He is familiar with industry fire codes, standards and guidelines, and reviewing design/construction plans/specifications for code compliance.

EDUCATION AND PROFESSIONAL ASSOCIATIONS

Bachelor of Science - Fire Protection and Safety Engineering Technology - Oklahoma State University, Oklahoma

Associates in Applied Science - Fire Protection Technology - Guilford Technical Community College, North Carolina

Certified Fire and Explosion Investigator, National Association of Fire Investigators

Certified Fire Investigator Instructor, National Association of Fire Investigators

Certified Fire Protection Specialist, National Fire Protection Association

NPQ 1 Fire Fighter, National Board on Fire Service Professional Qualifications

NPQ 1 Fire and Life Safety Educator, National Board on Fire Service Professional Qualifications

NPQ Hazmat Awareness Level, National Board on Fire Service Professional Qualifications

Member: National Association of Fire Investigators
National Institute for Certification in Engineering Technologies

EMPLOYMENT HISTORY

2003 - Present
2001 - 2003
1999 - 2001
1988 - 1998

HOUSTON DALLAS/FT. WORTH MC ALLEN SAN ANTONIO CORPUS CHRISTI AUSTIN NEW ORLEANS
ATLANTA CHICAGO TAMPA FT. LAUDERDALE ORLANDO LAS VEGAS DENVER PHOENIX LAFAYETTE
BALTIMORE LOS ANGELES ZURICH MADRID KUWAIT

M.L. "BUDDY" JENKINS, C.F.E.I., C.F.J.I., C.V.F.I., P.I.
FIRE DIVISION MANAGER

Mr. Jenkins has extensive experience in the fire-related sector encompassing 28 years in the municipal fire service and additional 12 plus years, which are specific to the insurance and legal industries. This experience includes a combination of field and management assignments in the fire service including suppression, prevention, investigation, and training.

Mr. Jenkins' specific areas of experience include determining the cause and origin of fires. His fire cause and origin determinations have primarily included, but are not limited to, assignments involving residential, commercial, industrial, vehicle, marine, farm implement/equipment, chemical, and energy product-related fires. Mr. Jenkins' expertise also includes the ability to perform inspections and critique residential and commercial property for fire code compliance with the National Fire Protection Association (NFPA) Fire Codes.

Mr. Jenkins is qualified as an expert witness in the determination of fire cause and origin cases both for civil and criminal cases. His qualifications have been proven in numerous depositions and testimonies for local, state, and federal court systems. As an expert, he has been challenged on numerous occasions in the court system relating to the Daubert Act. He has never failed a Daubert court challenge.

EDUCATION AND PROFESSIONAL ASSOCIATIONS

Associate of Arts - Fire Protection Technology - El Centro College, Dallas, TX
Associate of Arts - Criminal Justice - El Centro College, Dallas, TX
Texas Municipal Fire Training School Staff Instructor - Texas A & M University
North Texas Police Academy Staff Instructor - Arlington, TX
Texas Department of Public Safety Training Academy Staff Instructor - Austin, TX
Certified in Fire Suppression and Fire Service Education and Training by the Texas Commission on Fire Protection Personnel Standards and Education
Certified Fire and Explosion Investigator (CFEI)
Certified in HAZWOPER (NEI-29CFR1910.120) Program
Completed OSHA Hazardous Waste Operations and Emergency Response (HAZWOPER) Course
Completed OSHA Hazardous Waste Operations and Emergency Response (HAZWOPER) Site Supervisor Course
Certified Instructor for Texas Department Of Insurance Continuing Education Courses
Completed NFPA - 921 Training Course
Fire Dynamic, Scientific Insights of Investigators- Oklahoma State University
Fire Origin and Cause - Public Agency Training Council
Registered with the Texas Board of Private Investigators and
Private Security Agencies - License No. A-05995
Registered - Louisiana Board of Private Investigator Examiners - Certificate No. 3594-012898-1A

HOUSTON DALLAS FT. WORTH MC ALLEN SAN ANTONIO CORPUS CHRISTI AUSTIN PHOENIX
NEW ORLEANS LAFAYETTE ATLANTA TAMPA FT. LAUDERDALE ORLANDO JACKSONVILLE
CHICAGO BALTIMORE DENVER LAS VEGAS LOS ANGELES, CHARLOTTE, JACKSON, ZURICH MADRID KUWAIT



RECEIVED JAN 11 2005

Allstate.

You're in good hands.

ALLSTATE INSURANCE COMPANY

16700 East Hardy, Suite A
Houston, Texas 77032

January 6, 2005

Ford Motor Company - General Counsel's Office
3 Parklane Blvd, Ste PTW300
Dearborn, MI 48126
Attn: Shawn Norton

Re:	Our Claim Number:	[REDACTED]
	Our Insured:	[REDACTED]
	Vehicle:	1997 Ford F150
	VIN #:	1FTDX1766VN [REDACTED]
	Date of Loss:	10/28/04
	Loss Location:	[REDACTED] Highway, Nederland, Tx.
	Amount of Loss:	\$5,184.81

Dear Ms. Norton:

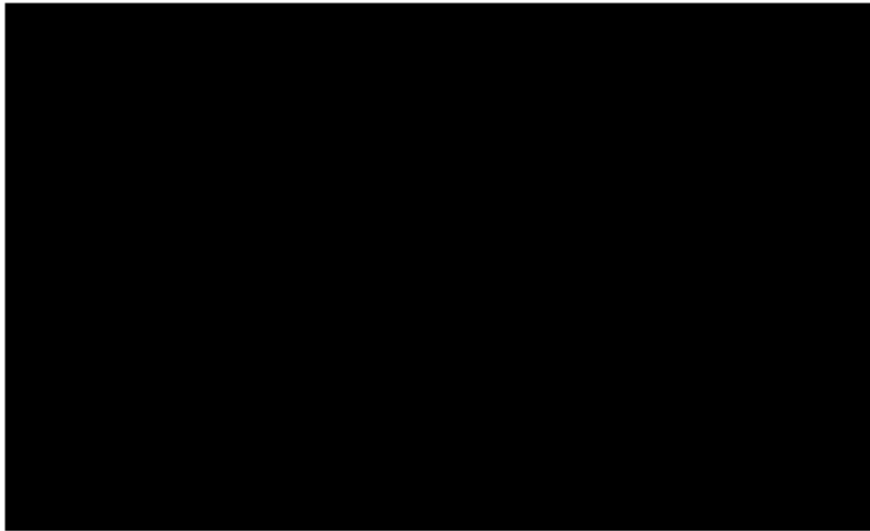
Please accept this letter as notice to your company of a claim for subrogation. Our policyholder sustained fire damage to the above referenced vehicle. The damages are possibly linked to the speed control deactivation switch.

Allstate Insurance Company has completed the initial inspection. Thomas Bender with Rimkus Consulting Group, Inc. has also been contacted to inspect the vehicle. Please contact him at 713-621-3550 to make arrangements for a joint inspection.

If any further information is needed, I can be reached at 281-618-5326.

Sincerely,

Laura Villarreal
Service Representative
Allstate Insurance Company





April 1, 2002

THE CINCINNATI INSURANCE COMPANIES

THE CINCINNATI INSURANCE COMPANY THE CINCINNATI INDEMNITY COMPANY
THE CINCINNATI CASUALTY COMPANY THE CINCINNATI LIFE INSURANCE COMPANY

4001 Santa Barbara Blvd., #319

Naples, FL 34104

Phone (941) 348-0021

Fax (941) 348-1601

Mr. Shawn Norton
Ford Motor Company
Three Parklane Boulevard
Suite 300
Dearborn, MI 48126

Re: Policyholder [REDACTED]
Policy Number [REDACTED]
Date of Loss : 11/20/01
Your Claim Number : Unknown

cl 3/02

Dear Mr. Norton:

Please review the following information in which I have attempted to answer the questions to your inquiry letter dated January 10, 2002.

1. The accident occurred on November 20, 2001, in Naples, Florida.
2. The insured drove his vehicle to P.J.'s Coffee Shop from his home on the date on the loss. P.J.'s Coffee is only a mile from the insured's home. While the insured was drinking coffee, the insured vehicle caught on fire. The insured vehicle was parked, unoccupied, and not running when the fire started. No repairs had been performed on the insured vehicle in the past year.
3. The fire report is attached to this correspondence.
6. There was approximately 62,000 miles on the insured vehicle when the loss occurred.
12. The defective part was never repaired or replaced.
13. The Copart Network has salvaged the insured vehicle.
14. This information was included in our original subrogation letter.
15. The service history information is attached to this correspondence.
16. No modifications were made to the insured vehicle after the insured purchased the vehicle.
21. The vehicle was not running when the fire started.
22. The keys were not in the ignition when the fire started.
25. The insured purchased this vehicle as new from Tamiami Ford in Naples, FL.

*- Naples, FL
- 62,000 @
- 00W*



Please contact me after you have made a liability decision based on the subrogation information that I have forwarded to your attention.

If you have any questions, please call me.

Sincerely,



Jason Chachere
Claims Representative