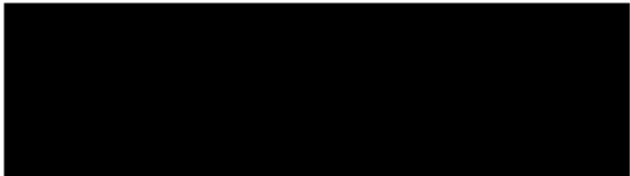


STATE OF MICHIGAN
IN THE 3B DISTRICT COURT



Plaintiffs,

vs.

Case No.

**FORD MOTOR COMPANY, AND
GATEWAY FORD,**

Defendants,

EDWARD L. JOHNSON P54646
Attorneys for Plaintiffs
1249 Washington Boulevard
Suite 2900
Detroit, Michigan 48226
(313) 965-6277

COMPLAINT AND JURY DEMAND

NOW COME Plaintiffs [REDACTED] as Subrogee
of [REDACTED] by and through its attorney, Edward L. Johnson, and for its Complaint against
the Defendants Ford Motor Company and Gateway Ford, states as follows:

COUNT I

1. Plaintiffs is a foreign corporation conducting business in the City of Centerville,
State of Michigan.
2. Defendant Ford Motor Company, is a foreign corporation, conducting business in

the City of Centerville, State of Michigan.

3. Defendant Gateway Ford, is a Michigan business conducting business in the City of Centerville, State of Michigan.

4. The Defendants manufactured, sold and/or supplied a 1999 Ranger VIN 1FTYR14V9X[REDACTED] to [REDACTED]

5. On April 14, 2003, Plaintiff's insured was driving his 1999 Ranger on Sewitteer Road, in the City of Centerville, when the subject vehicle caught fire and was damaged.

6. Defendants having sold, manufacture, and/or supplier of 1999 Ranger, knew or should have known that property damages concerning the 1999 Ranger could occurred during operation. Notwithstanding said knowledge, the Defendants failed to act as a reasonable seller, manufacturer, and/or supplier of the 1999 Ranger, and failed to take adequate precautions to guard against such foreseeable and unreasonable risks of damage.

7. The Defendants were negligent and such negligence was a proximate cause of Plaintiff's damages, and consisted of, but were not limited to the following:

- A. Failure to properly and adequately manufacture, and sell the 1999 Ranger so as to protect against foreseeable and unreasonable risks of damage, such as occurred to Plaintiff's insured's vehicle.
- B. Failure to properly and adequately inspect and test its product to insure against foreseeable an unreasonable risks of damage by its users, specifically Plaintiff's insured [REDACTED]
- C. In manufacturing, supplying and selling a 1999 Ranger with a faulty fuel system.
- D. Failure to warn of the hazards of the fuel system.

E. Failure to provide adequate warning in a manner sufficient to advise the operator of the dangers associated with the fuel system.

F. In manufacturing, supplying and selling a 1999 F-150 with a junction box could fail, and in failing to warn of this condition.

8. As a direct and proximate result of the negligence of the Defendants as aforesaid, Plaintiff suffer damages in the amount of \$11,595.20 Dollars.

WHEREFORE, Plaintiffs demand Judgment against Defendants Ford Motor Company and Gateway Ford, in an amount of \$11,595.20 Dollars, plus costs, interest and attorney fees.

COUNT II

9. Plaintiffs reallege and incorporate by reference each and every allegation as contained in Count I as if set forth fully herein, and for Count II state as follows.

10. At the time the Defendants Ford Motor Company and Gateway Ford, manufactured, supplied and sold its 1999 Ford Ranger as previously described, it warranted expressly and impliedly that said Ranger was safe and fit for the purposes and uses reasonably foreseeable and intended when it left Defendant's control, but contrary to said warranties, said Ranger was not reasonably fit for the purposes and uses reasonably foreseeable, but was defective in the following, but not limited to the following particulars:

A. The Defendant failed to properly and adequately manufacture and sell the subject Ranger so as to protect against foreseeable and unreasonable risks of damage, such as occurred to Plaintiff insured vehicle.

B. The Defendants failed to properly and adequately inspect and test its product to insure against foreseeable and unreasonable risks of

damage Plaintiff's insured [REDACTED] 1999 Ranger.

- C. Defendants knew or should have known and recognized that the fuel system could fail.
- D. In manufacturing, supplying and selling a vehicle with a fuel system which could fail.
- E. The Defendants failed to warn of the hazards of the junction box.
- F. The Defendants failed to provide adequate warning in a manner sufficient to advise the operator of the dangers associated with the fuel system.

11. As a direct and proximate result of the above described breaches of implied and express warranties by the Defendants, said 1999 Ranger was defective and caused Plaintiff to suffer damages in the amount of \$11,595.20 Dollars.

COUNT III

12. Plaintiff's reallege and incorporate by reference each and every allegation as contained in Count I, Count II as if set forth fully herein, and for Count III state as follows.

13. That prior to April 14, 2003, Plaintiff's insured purchased the subject vehicle from the Defendants.

14. The paperwork which was presented to Plaintiff's insured did not match the quality of the subject vehicle.

15. Under the Michigan Consumer Protection Act, the Defendants were in the process of conducting trade or commerce as that term is defined in MCLA 445.902(d).

16. The Defendants violated the Consumer Protection Act by acting in an unfair, unconscionable and deceptive manner including, without limitation:

- a. Representing that vehicle had characteristics, uses, and benefits it the not have in violation of the prohibition in MCLA 445.903(l)(c);
- b. There were gross discrepancies between the oral presentations of the seller and the written agreement covering the same transaction despite the prohibition in MCL 445.903(l)(y);
- c. Violating other provisions in the Michigan Consumer Protection Act including, without limitation, MCL 445.903(1)(d),(e),(n), (p),(x), and/or (bb).

17. The Defendants also made certain representations as to the quality of the vehicle and the lack of need for repair.

18. Those representations were false and were made in violation of the Consumer Protection Act.

19. As a direct and proximate result of the Defendants' actions, Plaintiff and its insured has suffered and will continue to suffer damages in the amount of \$11,595.20 including, without limitation:

- a. Loss of use of the subject vehicle;
- b. Incidental damages;
- c. Loss of enjoyment of vehicle;
- d. Attorney's fees;

WHEREFORE, Plaintiffs demand Judgment against Defendant Ford Motor Company and Gateway Ford, in the amount of \$11,595.20 Dollars, plus costs, interest and attorney fees.

COUNT IV

20. Plaintiffs reallege and incorporate by reference each and every allegation as contained in Court I, Court II, Court III as if set forth fully herein, and for Court IV state as

follows.

21. That the subject vehicle was purchased by Plaintiff's insured on or about May 3, 2003, from Gateway Ford.

22. That less than one year after the subject vehicle was purchased it burst into flames while Plaintiff's insured was driving his vehicle on Schweitzer in the City of Centerville.

23. That the Defendants pursuant to MCLA 440.2314 and MCLA 440.2315 had a duty to manufacture, supply and sell a vehicle of merchantable quality and fit for its particular purpose.

24. That the Defendants breached their duty to manufacture, supply, and sell a vehicle of merchantable quality and fit for its particular purpose.

25. As a direct and proximate result of the Defendants' breaches, Plaintiff and its insured has suffered and will continue to suffer damages in the amount of \$11,595.20.

WHEREFORE, Plaintiffs demand Judgment against Defendant Ford Motor Company and Gateway Ford, in the amount of \$11,595.20 Dollars, plus costs, interest and attorney fees.

Respectfully submitted,

BY: 

Edward L. Johnson (P54646)
Attorney for Plaintiff
1249 Washington Boulevard
Suite 2900
Detroit, MI 48226
(313) 963-6277

A 07502 MI 04 14 2003 1 03-000036 000
 FD # State # Incident Date # Station Incident Number # Exposure #
 Delete MYRS -1
 Change Rank
 No Activity

B Location* Check this box to indicate that the address for this incident is provided on the Wildland MAP (found in Section 8 "Alternative Location Specification", see only for Wildland fires)
 Street address
 Intersection Number/Highway Prefix Street or Highway Street Type Suffix
 In front of
 Rear of
 Adjacent to Apt./Suite/Room City State Zip Code
 Directions COVERED BRIDGE RD

C Incident Type *
 131 Passenger vehicle fire
 Incident Type

E1 Date & Times Midnight is 0000
 Check boxes if dates are the same as Alarm ALARM always required
 Date Alarm # 04 14 2003 23:37:00
 Month Day Year Hr Min Sec
 ARRIVAL required, unless cancelled or did not arrive
 Arrival # 04 14 2003 23:54:00
 CONTROLLED Optional, except for wildland fires
 Controlled 04 15 2003 00:00:00
 LAST UNIT CLEARED, required except for wildland fires
 Last Unit 04 15 2003 01:00:00
 Cleared

E2 Shift & Alarm
 Local Option
 Shift or Alarm District Platoon

D Aid Given or Received*
 1 Mutual aid received
 2 Automatic aid received
 3 Mutual aid given
 4 Automatic aid given
 5 Other aid given
 6 None
 Their FDID Their State
 Their Incident Number

E3 Special Studies
 Local Option
 Special Study ID# Special Study Value

F Actions Taken *
 11 Extinguish Primary Action Taken (1)
 86 Investigate Additional Action Taken (2)
 Additional Action Taken (3)

G1 Resources *
 Check this box and skip this section if an apparatus or personnel form is used.
 Apparatus Personnel
 Suppression 0003 0007
 Engine
 Other
 Check box if resources counts include aid received resources.

G2 Estimated Dollar Losses & Values
 LOGS: Required for all fires if known. Optional for non fires.
 Property \$ 009,000
 Contents \$ 000,000
 PRE-INCIDENT VALUE: Optional
 Property \$ 009,000
 Contents \$ 000,000

Completed Modules
 Fire-2
 Structure-3
 Civil Fire Cas.-4
 Fire Serv. Cas.-5
 EMS-6
 Hazmat-7
 Wildland Fire-8
 Apparatus-9
 Personnel-10
 Arson-11

H1 Casualties
 Deaths Injuries
 Fire
 Civilian
H2 Detector
 Required for Confined Fires.
 1 Detector alerted occupants
 2 Detector did not alert them
 3 Unknown

H3 Hazardous Materials Release
 None
 1 Natural Gas: size leak, no structure or nearby vehicles
 2 Propane gas: ckt. lb. tank (no lb. tank not spill)
 3 Gasoline: vehicle fuel tank or portable container
 4 Antifreeze: fuel heating equipment or portable storage
 5 Diesel fuel/fuel oil: vehicle fuel tank or portable
 6 Household solvents: household spill, always spill
 7 Motor oil: from engine or portable container
 8 Paint: from paint can totaling > 20 gallons
 9 Other: chemical spills, batteries, regulated or spill > 20 gal.
 Always include the amount lost.

I Mixed Use Property
 Not Mixed
 10 Assembly use
 20 Education use
 30 Medical use
 40 Residential use
 51 Row of stores
 53 Enclosed mall
 88 Bus. & Residential
 99 Office use
 60 Industrial use
 63 Military use
 65 Farm use
 00 Other mixed use

J Property Use# Structures
 131 Church, place of worship
 161 Restaurant or cafeteria
 162 Bar/tavern or nightclub
 219 Elementary school or kindergarten
 215 High school or junior high
 241 College, adult education
 311 Care facility for the aged
 331 Hospital
 341 Clinic, clinic type infirmary
 342 Doctor/dentist office
 361 Prison or jail, not juvenile
 419 1- or 2-family dwelling
 429 Multi-family dwelling
 439 Rooming/boarding house
 449 Commercial hotel or motel
 459 Residential, board and care
 464 Dormitory/barracks
 519 Food and beverage sales
 539 Household goods, sales, repairs
 579 Motor vehicle/boat sales/repair
 571 Gas or service station
 599 Business office
 615 Electric generating plant
 629 Laboratory/science lab
 700 Manufacturing plant
 819 Livestock/poultry storage (barn)
 882 Non-residential parking garage
 891 Warehouse
Outside
 124 Playground or park
 655 Crops or orchard
 669 Forest (timberland)
 807 Outdoor storage area
 919 Dump or sanitary landfill
 931 Open land or field
 936 Vacant lot
 938 Staked/gave for plot of land
 946 Lake, river, stream
 951 Railroad right of way
 960 Other street
 961 Highway/divided highway
 962 Residential street/driveway
 981 Construction site
 984 Industrial plant yard
 Lockup and other a Property Use code only if you have NOT checked a Property Use box.
 Property Use 962
 Residential street, road or
 MYRS-1 Revision 03/11/99

K1 Person/Entity Involved

Local Option: _____ Business Name (if applicable): _____ Area Code: _____ Phone Number: _____

Check this box if same address as incident location. Then skip the three duplicate address lines.

Mr., Ms., Mrs. First Name: _____ MI: _____ Last Name: _____ Suffix: _____

Number: _____ Prefix: _____ Street or Highway: _____ Street Type: _____ Suffix: _____

Post Office Box: _____ Apt./Suite/Room: _____ City: _____

State: _____ Zip Code: _____

More people involved? Check this box and attach Supplemental Forms (NFIRS-16) as necessary

K2 Owner

Local Option: _____ Business Name (if applicable): _____ Area Code: _____ Phone Number: _____

Same as person involved? Then check this box and skip the rest of this section.

Check this box if same address as incident location. Then skip the three duplicate address lines.

Mr., Ms., Mrs. First Name: _____ MI: _____ Last Name: _____ Suffix: _____

Number: _____ Prefix: _____ Street or Highway: _____ Street Type: RD Suffix: _____

Post Office Box: _____ Apt./Suite/Room: _____ City: BURR OAK

State: MI Zip Code: _____

L1 Remarks

Local Option: _____

The vehicle was found in the middle of the Schweitzer road with the main fire being in the engine and passenger compartments. The owner did not have any trouble with the vehicle prior to the fire.

L2 Authorization

Officer in charge ID: 143 Signature: McNamara, Matt Position or rank: CP Assignment: _____ Month: 06 Day: 07 Year: 2003

Check box if same as Officer in charge. Number making report ID: _____ Signature: No Staff ID Position or rank: _____ Assignment: _____ Month: _____ Day: _____ Year: _____

ENRS-885-10-8837

A	07502 FD00 *	MI State *	04 14 Incident Date *	2003 YYYY	1 Station	03-000036 Incident Number *	000 Exposure *	<input type="checkbox"/> Delete <input type="checkbox"/> Change <input type="checkbox"/> No Activity	FFIRS -2 Fire
B Property Details					C On-Site Materials <input checked="" type="checkbox"/> None or Products				
B1 <input checked="" type="checkbox"/> Not Residential Estimated Number of residential living units in building of origin whether or not all units became involved					Enter up to three codes. Check one or more boxes for each code entered. <input checked="" type="checkbox"/> None On-site material (1)				
B2 <input checked="" type="checkbox"/> Buildings not involved Number of buildings involved					<input type="checkbox"/> <input type="checkbox"/> On-site material (2)				
B3 <input checked="" type="checkbox"/> None Acres burned (outside firms) <input type="checkbox"/> Less than one acre					<input type="checkbox"/> <input type="checkbox"/> On-site material (3)				
D Ignition					E1 Cause of Ignition <input type="checkbox"/> Check box if this is an exposure report. Skip to section U				
D1 03 Engine, area, running Area of fire origin *					1 <input type="checkbox"/> Intentional 2 <input type="checkbox"/> Unintentional 3 <input type="checkbox"/> Failure of equipment or heat source 4 <input type="checkbox"/> Set of device 5 <input type="checkbox"/> Cause under investigation U <input checked="" type="checkbox"/> Cause undetermined after investigation				
D2 00 Undetermined Heat source *					E2 Factors Contributing To Ignition <input checked="" type="checkbox"/> None Factor Contributing To Ignition (1)				
D3 00 Undetermined Item first ignited * <input type="checkbox"/> Check box if flow spread item confirmed to object of origin					<input type="checkbox"/> <input type="checkbox"/> Factor Contributing To Ignition (2)				
D4 <input type="checkbox"/> <input type="checkbox"/> Type of material first ignited Required only if item first ignited code is 04 or 00					E3 Human Factors Contributing To Ignition Check all applicable boxes 1 <input type="checkbox"/> Asleep <input checked="" type="checkbox"/> None 2 <input type="checkbox"/> Possibly impaired by alcohol or drugs 3 <input type="checkbox"/> Unattended person 4 <input type="checkbox"/> Possibly mental disabled 5 <input type="checkbox"/> Physically Disabled 6 <input type="checkbox"/> Multiple persons involved 7 <input type="checkbox"/> Age was a factor Estimated age of person involved _____ 1 <input type="checkbox"/> Male 2 <input type="checkbox"/> Female				
F1 Equipment Involved In Ignition <input type="checkbox"/> None if equipment was not involved, skip to section U Equipment involved _____ Brand _____ Model _____ Serial # _____ Year _____					F2 Equipment Power _____ Equipment Power Source F3 Equipment Portability 1 <input type="checkbox"/> Portable 2 <input type="checkbox"/> Stationary Portable equipment normally can be moved by one person, is designed to be used in multiple locations, and requires no tools to install.				
H1 Mobile Property Involved <input type="checkbox"/> None 1 <input type="checkbox"/> Not involved in ignition, but damaged 2 <input type="checkbox"/> Involved in ignition, but did not burn 3 <input checked="" type="checkbox"/> Involved in ignition and burned					H2 Mobile Property Type & Make 10 Passenger road vehicle. Mobile property type FO Ford Mobile property make RANGER 1999 Mobile property model _____ License Plate Number MI 1P7KRL6V82AU State VIN Number				
					G Fire Suppression Factors Enter up to three codes. <input checked="" type="checkbox"/> None <input checked="" type="checkbox"/> <input type="checkbox"/> Fire suppression factor (1) <input type="checkbox"/> <input type="checkbox"/> Fire suppression factor (2) <input type="checkbox"/> <input type="checkbox"/> Fire suppression factor (3)				
					Local Use <input type="checkbox"/> Fire-Prevention Plan Available Some of the information presented in this report may be based upon reports from other agencies <input type="checkbox"/> Arson report attached <input type="checkbox"/> Police report attached <input type="checkbox"/> Coroner report attached <input type="checkbox"/> Other reports attached				

FFIRS-2-03-10-0338

Apparatus or Resource		Date and Times			Sent	Number of People	Use	Actions Taken	
Use codes listed below		Check if same as alarm data			<input checked="" type="checkbox"/>		Check ONE box for each apparatus to indicate its main use at the incident.	List up to 3 actions for each apparatus and each personnel.	
		Month	Day	Year	Hours/minutes				
1 ID 111 Type 11		Dispatch	4	14	2003	23:37	Sent		
		Arrival	4	14	2003	23:54	<input checked="" type="checkbox"/>	3	
		Clear	4	15	2003	01:00			
							<input checked="" type="checkbox"/>	Suppression	73
								MS	76
								Other	
Personnel ID	Name	Rank or Grade	Attend	Action Taken	Action Taken	Action Taken	Action Taken	Action Taken	
143	McNamara, Matt	CP	X	12	81				
154	Miracle, David	IT	X	11	12				
189	Balk, Bryan	FF	X	11	12				
2 ID 113 Type 71		Dispatch	4	14	2003	23:37	Sent		
		Arrival	4	14	2003	23:54	<input checked="" type="checkbox"/>	2	
		Clear	4	15	2003	01:00			
							<input checked="" type="checkbox"/>	Suppression	73
								MS	
								Other	
Personnel ID	Name	Rank or Grade	Attend	Action Taken	Action Taken	Action Taken	Action Taken	Action Taken	
144	Miller, Tom	CP	X	80					
171	Cripe, Dan	MFR	X	90					
3 ID 115 Type 16		Dispatch	4	14	2003	23:37	Sent		
		Arrival	4	14	2003	23:54	<input checked="" type="checkbox"/>	2	
		Clear	4	15	2003	01:00			
							<input checked="" type="checkbox"/>	Suppression	73
								MS	
								Other	
Personnel ID	Name	Rank or Grade	Attend	Action Taken	Action Taken	Action Taken	Action Taken	Action Taken	
172	Bohm, Dennis	FF	X	12					
184	Bainbridge, Doug	FFE	X	11	12				

EPR-005-LC-0039

JUN 19 2003

WFIRS-10 Revision 11/17/99

RUN NUMBER:	03-038	INCID. LOC:	Schweitzer 1 mile E of Covered Bridge	
DATE:	4/14/2003			
TIME OF DISP.	23:50	DAM.AMT. STRU.	\$0.00	
TIME OF RETURN:	1:00	DAM.AMT.GONT.	\$0.00	
INCID. COMM.	McNamara	DAM.AMT.VECH.	\$8,000.00	
GOV'T UNIT:	Nottawa	VEHICLE CONT.	\$200.00	
OWNER:		PROPERTY DAM.	\$0.00	
ADDRESS:				
	Burr Oak	WAS TANKER	WATER USED?	NO
PHONE NUMBER:		SPECIAL NOTES:		
INS. CO.	State Farm	EST GAL OF	WATER USED?	750
OCCUPANT:		CAUSE OF FIRE:	Unknown	
ADDRESS:				
PHONE NUMBER:				
INSURANCE CO.				
FIREFIGHTERS	HOURS	REGULAR PAY	STANDBY PAY	TOTAL PAY
		\$10.00/ HOUR	\$5.00/ HOUR	
BAINBRIDGE, D	1.50	1.50	0.00	15.00
BALK, BILL	0.00	0.00	0.00	0.00
BALK, BRYAN	1.50	1.50	0.00	15.00
BOHM, D	1.50	1.50	0.00	15.00
BORNTREGER, G.	0.00	0.00	0.00	0.00
BRYIE, L.	0.00	0.00	0.00	0.00
CLEMENTZ, E	0.00	0.00	0.00	0.00
CRIFE, C	0.00	0.00	0.00	0.00
CRIFE, D	1.50	1.50	0.00	15.00
DAVIDSON, M	0.00	0.00	0.00	0.00
HARKER, B	0.00	0.00	0.00	0.00
HARRINGTON, T.J.	0.00	0.00	0.00	0.00
HASBROUCK, J	0.00	0.00	0.00	0.00
HETRICK, J	0.00	0.00	0.00	0.00
KELLEY, P	0.00	0.00	0.00	0.00
MCCLAIN, J	0.00	0.00	0.00	0.00
MCNAMARA, M	1.50	1.50	0.00	15.00
MILLER, M	0.00	0.00	0.00	0.00
MILLER, R	0.00	0.00	0.00	0.00
MILLER, T	1.50	1.50	0.00	15.00
MIRACLE, D	1.50	1.50	0.00	15.00
POP, GUSTAVO	0.00	0.00	0.00	0.00
RANGLER, ED J.	0.00	0.00	0.00	0.00
RANGLER, ED R.	0.00	0.00	0.00	0.00
RUMSEY, R	0.00	0.00	0.00	0.00
SCHLABACH, L	0.00	0.00	0.00	0.00
SCHWARTZ, M	0.00	0.00	0.00	0.00
STEFFE, S	0.00	0.00	0.00	0.00
SUMMEY, L	0.00	0.00	0.00	0.00
TROUTEN, S	0.00	0.00	0.00	0.00
WALTON, N	0.00	0.00	0.00	0.00
WETHERBEE, M	0.00	0.00	0.00	0.00
YEAGER, K	0.00	0.00	0.00	0.00
TOTALS	10.50	10.50	0.00	105.00
TOTAL GALLONS OF CLASS A FOAM USED:		0.00	DOLLAR AMT.	0.00
TOTAL GALLONS OF BIO SOLVE USED:		0.00	DOLLAR AMT.	0.00
			RUN TOTAL:	105.00

APR 19 2003

EA95-005-1C-0010



1. A close-up view of the Vehicle Identification Number in the area of the windshield and dash identifying the 1999 Ford, Ranger.

2. An overall view of the left front.





3. A close-up view of almost total consumption of the custom wheel with total consumption of the tire.

-
4. An overall view of the driver's side depicting the door open during the course of the fire.





5. An overall view of the left rear.

6. A close-up view of the fuel cap intact.





7. An overall view of the rear.

8. An overall view of the right rear.

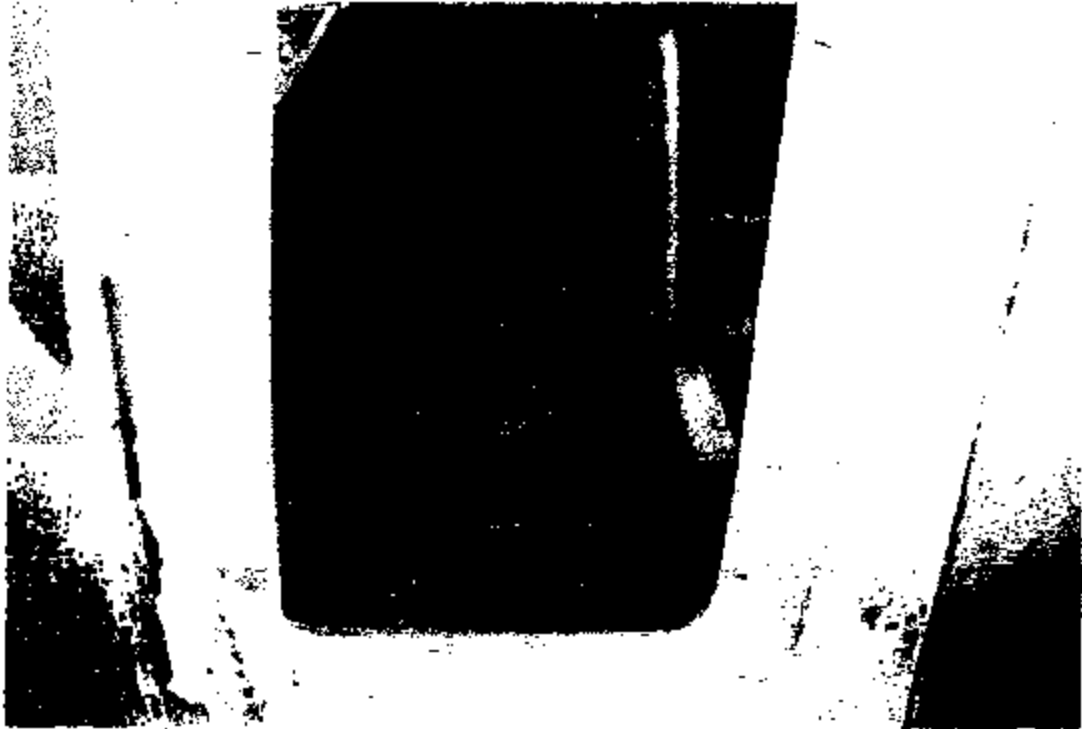




9. An overall view of the right front.

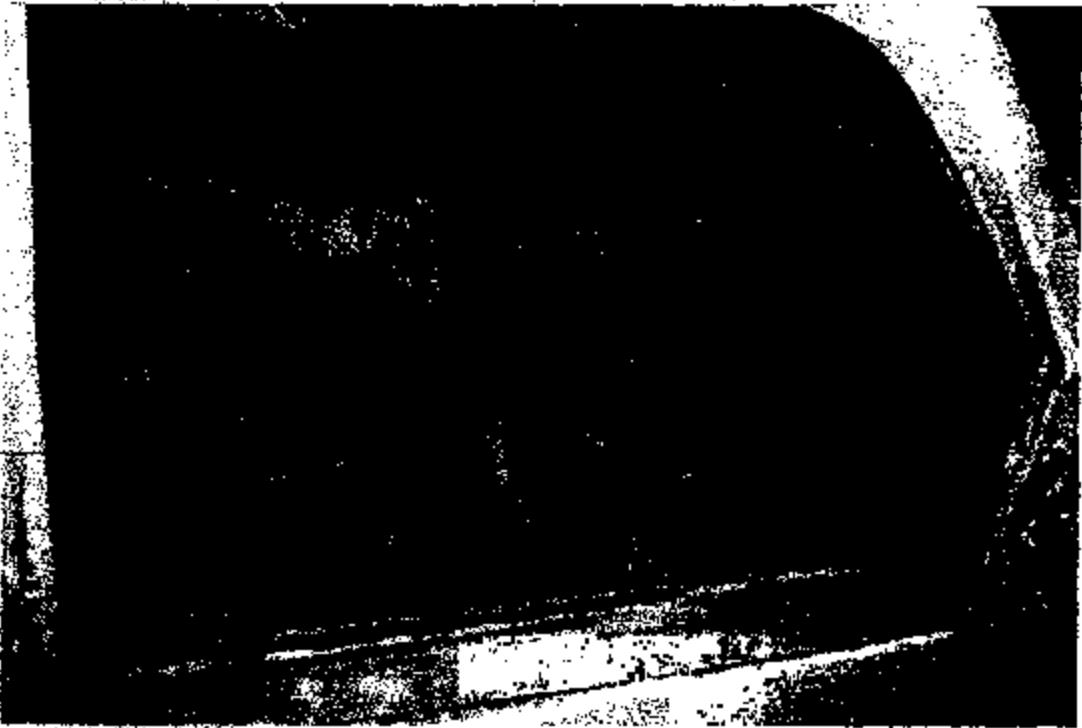
10. An overall view of the bed.





11. An overall view of the rear passenger compartment from the passenger's side.

12. An overall view of the front passenger compartment through the passenger's side.





13. An overall view of the dashboard.

14. An overall view of the passenger compartment through the windshield opening.



ER85-885-LC-8847



15. An overall view of the front passenger compartment from the driver's side.

16. An overall view of the engine compartment from the driver's side.





17. An overall view of the engine compartment on the driver's side from the front.

18. An overall view of the engine compartment from the front.





19. An overall view of the engine compartment from the passenger's side.

20. An overall view of the onboard computer in the right rear of the engine compartment.

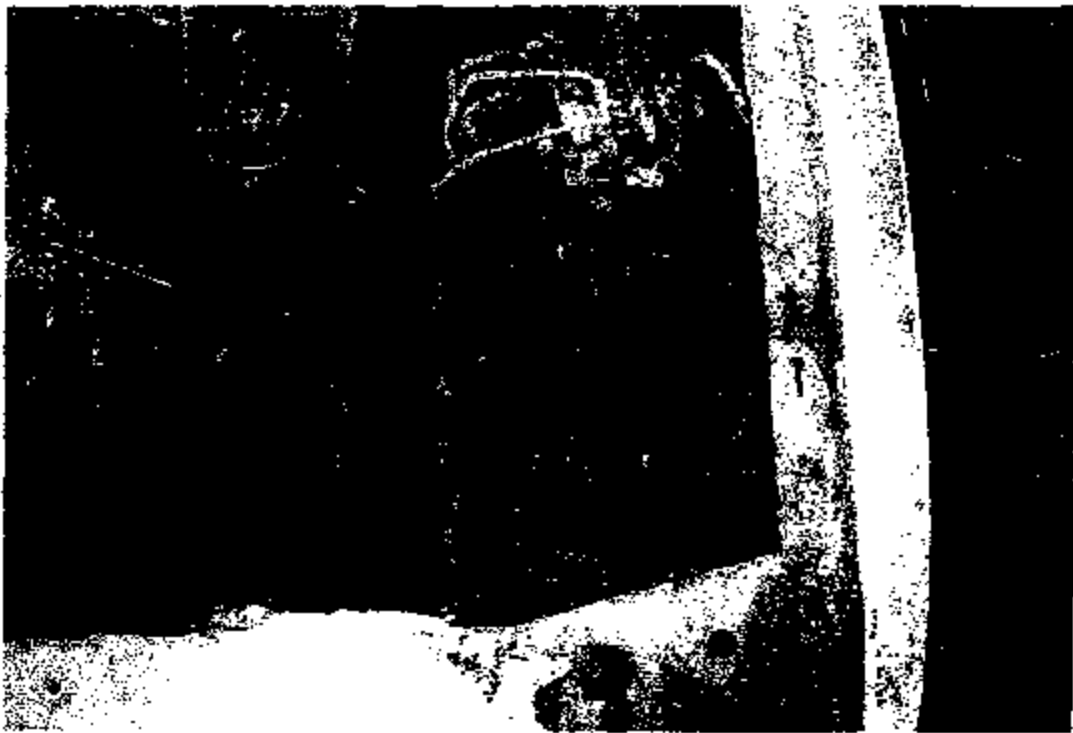




21. An overall view of the spark plug boots and wires on the right or passenger's side and the fiberglass valve cover.

22. An overall view of the front section of the engine compartment.





23. A close-up view of the battery.

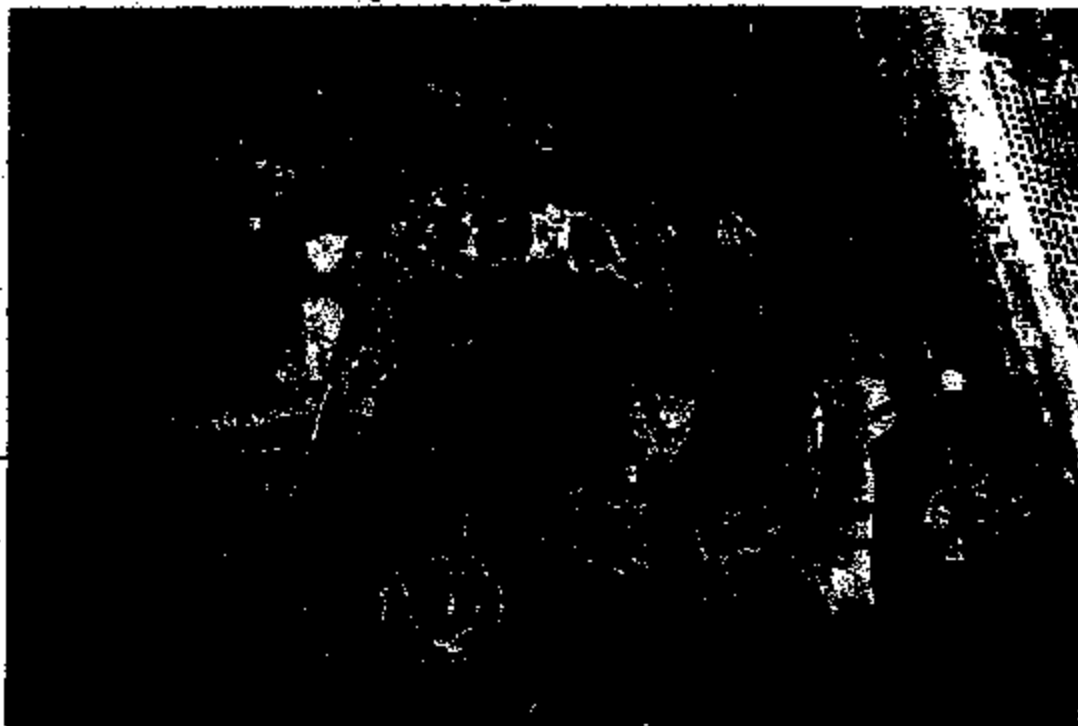
24. An overall view of remains of the fuse box in the left rear of the engine compartment.





25. A close-up view of the battery cables.

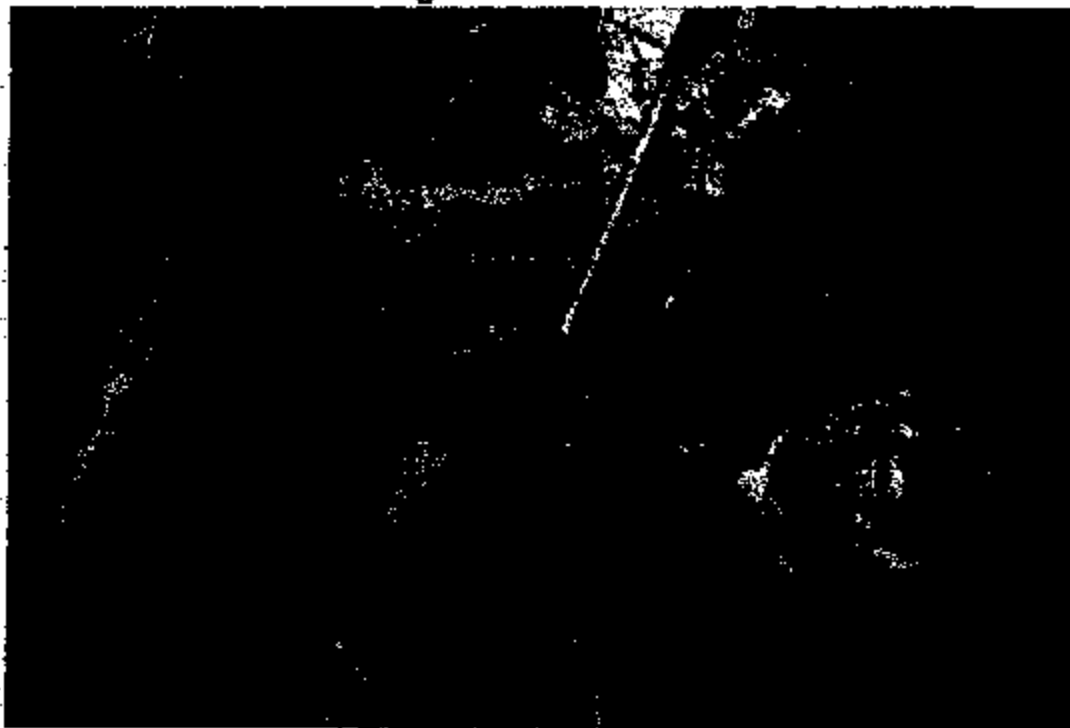
26. An overall view of the top of the engine.





27. A close-up view of the fuel line connection fire damaged.

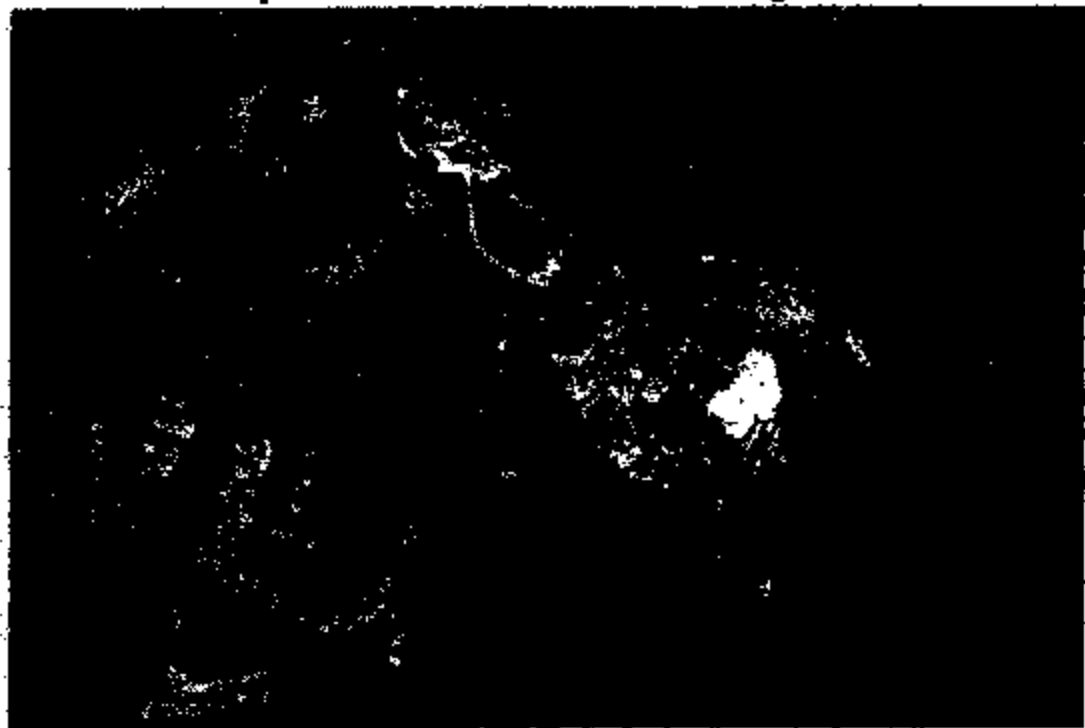
28. An overall view of the routing of the fuel line.





29. A close-up view of the routing of the fuel line and fuel line connection at the engine.

30. Another close-up view of the fuel line connection at the engine.

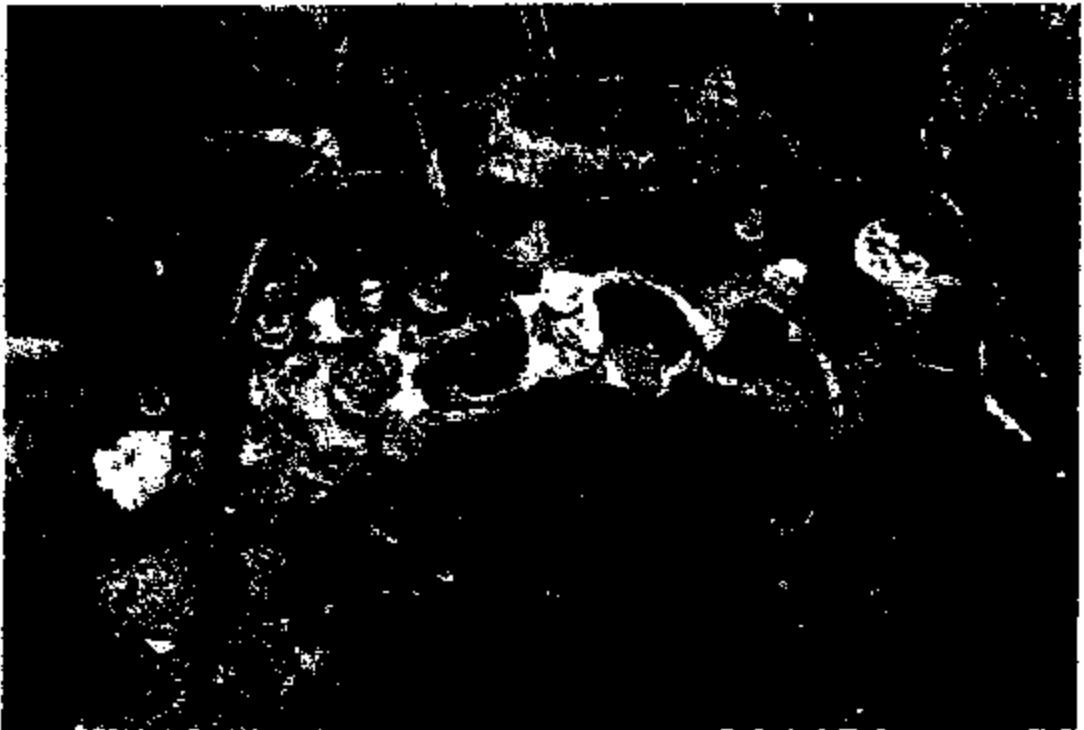




31. An overall view of the fuel line connection at the frame rail on the left or driver's side.

32. Another close-up view of this fuel line connection at the frame rail.

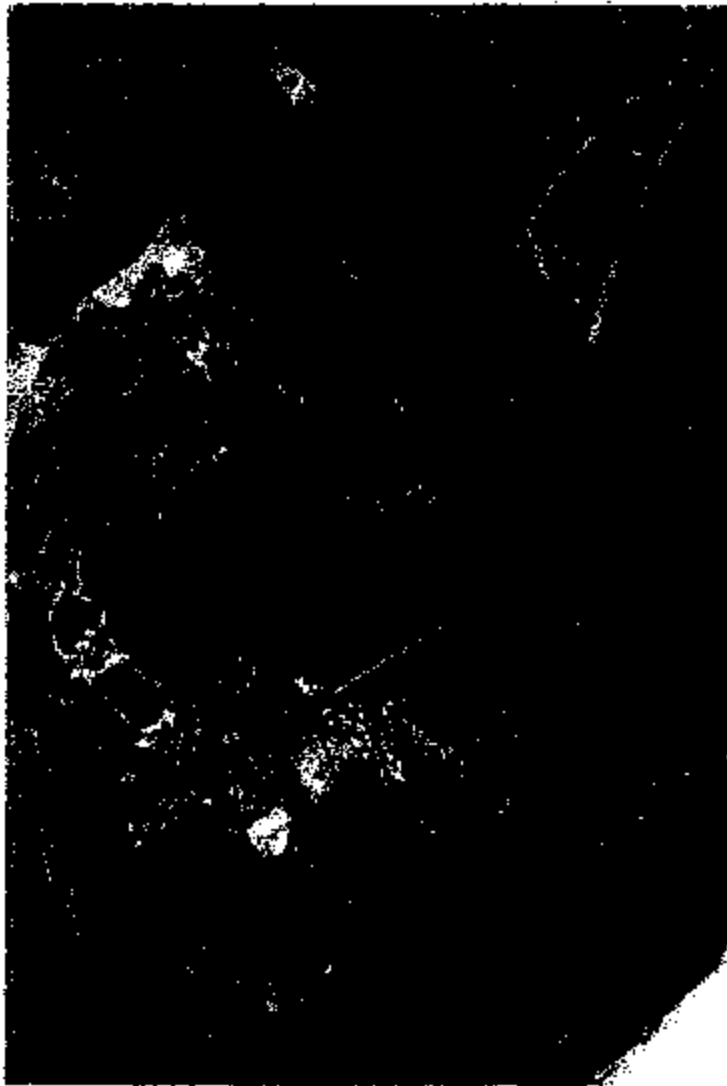




33. An overall view of the cast intake heavily fire damaged.

34. Another overall view of the cast components at the front section of the engine compartment heavily fire damaged.





35. An overall view of the left front of the engine heavily fire damaged.



[Redacted] v. Ford

January 11, 2001

This report summarizes my observations and conclusions concerning a January 8, 2000 fire involving a 1999 Ford Ranger, bearing vehicle identification number 1FTZR15X6X [Redacted]. I was unable to examine and inspect this vehicle because same was destroyed before Ford Motor Company had the opportunity to inspect the vehicle.

As a Design Analysis Engineer with Ford Motor Company, I am very familiar with the layout of the 1999 Ford Ranger engine compartment, including its alternator and wiring. I also have examined the engine compartment of an exemplar 1999 Ford Ranger. The routing of the wires connected to the alternator, as depicted in Mr. Davison's photographs of the subject vehicle after the fire, is not Ford's design and/or manufacture of the routing of the Ranger's alternator wiring as designed by Ford.

It is my opinion within a reasonable degree of engineering certainty that, assuming Plaintiffs' expert's photographs depict the vehicle as it was after the fire, the wiring in this vehicle was modified since the time it left Ford's control. If the routing of the wires was not modified after manufacture, there would be nothing to have caused an electrical arcing in the wires, and the fire would not have occurred.

There have been no recalls with regard to the alternator and/or alternator wiring for this year, make and model vehicle. Ford is not aware of any similar incidents whereby a fire was originated in a 1999 Ford Ranger as theorized by Plaintiffs' expert.

Because the vehicle was not made available to Ford after the initiation of suit, I cannot ascertain the exact cause/origin of the fire. Upon inspecting the vehicle's alternator and connected wiring, however, it is my opinion within a reasonable degree of engineering certainty that the alternator was not defective in any way and that the fire did not originate within the alternator itself.

All opinions expressed in this report are within a reasonable degree of engineering certainty.

Sumil S. Sharma



ERIE INSURANCE GROUP

Branch Office - 501 Commonwealth Dr. - P.O. Box 618 - Warrendale, PA 15086-0618
(724) 772-4000 - Toll Free 1-800-922-1934 - Fax (724) 772-7700

March 21, 2000

Ford Motor Company
Parklane Towers West, Suite 400
Three Parklane Blvd.
Dearborn, MI 48126

Re: **ERIE Claim** [REDACTED]
ERIE Insured: [REDACTED]
Date of Loss: 1/8/2000

To Whom It May Concern:

I am writing in regard to the above-captioned claim.

We represent our insured, [REDACTED] who purchased a 1999 Ford Ranger four-wheel drive, VIN 1FTZR15X6K [REDACTED] from Regina Ford.

This vehicle caught on fire on January 8, 2000 and is a total loss. We are putting you on notice of a potential subrogation claim. We request that you contact the undersigned within 30 days to make arrangements to inspect this vehicle.

Sincerely,

Tracy Hartman
Inside Claims Representative
Warrendale Branch Claims
(724) 772-7651

TH:lm

By certified mail

cc: W. L. Davidson
cc: West Penn Auction
P.O. Box 432
Adamsburg, PA 15611
cc: Chris & Nancy Roman

COPY ONLY ... COPY ONLY ... COPY ONLY ... COPY ONLY

044820

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

[Redacted]

Plaintiff,

vs.

FORD MOTOR COMPANY,

Defendant.

ARBITRATION DIVISION

No.: AR-00-3788 *AA*

Code: 03

COMPLAINT

Filed on behalf of Plaintiff:

[Redacted]

Counsel of Record for this Party:

KATHLEEN S. McALLISTER
PA ID NO 30764

DIBELLA & GEER, P.C.
Firm No. 099
312 Boulevard of the Allies
Third Floor
Pittsburgh, PA 15222
(412)261-2900

00 JUN 13 PM 4:08

PROCEEDINGS
ALLEGHENY COUNTY

HEARING DATE OCT 26 2000
ROOM 523 5th FLOOR COURTHOUSE
AT 9:00 A.M.

UPG#FERGIE
06-13-00 16:04:52
AR-00-00-3788

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

ARBITRATION DIVISION

No.

Code: 03

Plaintiffs,

vs.

FORD MOTOR COMPANY,

Defendant.

NOTICE TO DEFEND

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this Complaint and Notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE OR KNOW A LAWYER, THEN YOU SHOULD GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP:

LAWYER REFERRAL SERVICE
THE ALLEGHENY COUNTY BAR ASSOCIATION
920 City-County Building
PITTSBURGH, PENNSYLVANIA 15219
TELEPHONE NUMBER: (412) 261-0518

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

ARBITRATION DIVISION

No.

Code: 03

[REDACTED]
Plaintiffs,

vs.

FORD MOTOR COMPANY,

Defendant.

COMPLAINT

AND NOW come the Plaintiffs, [REDACTED]

[REDACTED] and through their attorney, DiBella & Geer, P.C., and file the following Complaint, the following of which is a statement:

1. The Plaintiffs, [REDACTED] are individuals residing at, and owners of real property located at, [REDACTED] Beaver County, Pennsylvania, [REDACTED]
2. At all times relevant and material hereto, the Plaintiffs were the owners of a 1999 Ford Ranger with VIN number 1FTZR15X6XT [REDACTED]
3. The Defendant, Ford Motor Company, is a corporation with its principal place of business at Parklane Towers West, Suite 400, Three Parklane Boulevard, Dearborn, Michigan, 48126-2568.
4. At all times relevant and material hereto, the Defendant, Ford Motor Company, (hereinafter referred to as "Ford"), was in the business of designing, manufacturing, servicing and repairing vehicles such as the one Ford designed and manufactured and which was purchased by the Plaintiffs, a 1999 Ford Ranger with VIN number 1FTZR15X6XT [REDACTED] (hereinafter referred to as the "vehicle").

5. By reason of their expertise in the design and manufacture of vehicles, Defendant, Ford, is held to the standard of care of an expert in the design and manufacture of vehicles such as the one purchased by the Plaintiffs and identified in the previous paragraph.

6. On or about January 8, 2000, a fire occurred in the engine compartment of the vehicle owned by the Plaintiffs, which fire caused substantial damage to the Plaintiffs' vehicle and driveway.

7. The aforementioned fire of January 8, 2000, originated as a result of a high resistance within the electrical circuitry of the vehicle which ignited the insulating material of the electrical wiring and nearby combustible material. The fire caused damage to the real and personal property of the Plaintiffs in the amount of \$21,863.34.

COUNT I

NEGLIGENCE

8. Paragraphs 1 through 7, inclusive, of this Complaint are incorporated herein by reference as though set forth at length herein.

9. The above-described fire and the resulting damages were the direct, proximate and reasonably foreseeable result of the negligent, careless, reckless and wanton conduct of the Defendant, Ford, and its servants, agents and/or employees acting within the scope of their employment as follows:

- a. In negligently and/or improperly designing, manufacturing, supplying, distributing or selling the vehicle which was purchased by the Plaintiffs;
- b. In failing to properly inspect the vehicle and certify it as safe for its intended use;
- c. In failing to warn the Plaintiffs of the deficiencies and inadequacies of the vehicle;
- d. In failing to provide the vehicle with the proper mechanisms and/or safe guards necessary for the prevention of a fire;

- e. In manufacturing the vehicle with malfunctioning or defective electrical circuitry which created a hazardous and dangerous condition to the Plaintiffs' property; and,
- f. In creating a hazardous and dangerous condition within the electrical circuitry of the vehicle which caused the fire of January 8, 2000.
10. As a result of the negligence of the Defendant, Ford, the Plaintiffs' real and personal property were damaged in the amount of \$21,663.34.

WHEREFORE, Plaintiffs, [REDACTED] request damages against the Defendant, Ford, in the amount of \$21,663.34.

COUNT II
BREACH OF IMPLIED WARRANTY
OF FITNESS AND MERCHANTABILITY

11. Paragraphs 1 through 10, inclusive, of this Complaint are incorporated herein by reference as though set forth at length herein.

12. The Defendant, Ford, impliedly warranted that the aforementioned vehicle was fit for the uses and purposes for which it was designed, manufactured, supplied, distributed and/or sold and that it was safe for use by the Plaintiffs.

13. Said vehicle was not fit for its intended purpose, and as a result of the Defendant's breach of its warranty of fitness and merchantability, the Plaintiffs sustained the damages complained of above.

WHEREFORE, Plaintiffs, [REDACTED] request damages against the Defendant, Ford, in the amount of \$21,663.34.

COUNT III
STRICT LIABILITY UNDER THE
RESTATEMENT OF TORTS, SECOND
SECTION 402A

14. Paragraphs 1 through 13, inclusive, of this Complaint are incorporated herein by reference as though set forth at length herein.

15. The aforementioned vehicle had a defective condition, unreasonably dangerous to the Plaintiffs and their property. The said defect existed when Defendant, Ford, sold or supplied the said vehicle to the Plaintiffs, the ultimate consumer or user, without substantial change in the condition in which it was manufactured.

16. The unreasonably dangerous and defective condition as set forth above caused the vehicle to malfunction and caused the fire of January 8, 2000.

17. The aforesaid unreasonably dangerous and defective vehicle was the direct and proximate cause of the fire which damaged real and personal property of the Plaintiffs in the amount of \$21,863.34.

WHEREFORE, Plaintiffs, [REDACTED] request damages against the Defendant, Ford, in the amount of \$21,863.34.

Respectfully submitted,

DIBELLA & GEER, P.C.

BY: Kathleen S. McAllister
KATHLEEN S. McALLISTER, ESQUIRE
Attorney for Plaintiffs

VERIFICATION

I, [REDACTED] verify that the statements made in the within COMPLAINT are true and correct to the best of my knowledge. I understand that false statements herein are made subject to the penalties of 18 Pa.C.S.A. Section 4904 relating to unsworn falsification to authorities.

[REDACTED]

Dated: 6-11-00

VERIFICATION

I, [REDACTED] verify that the statements made in the within COMPLAINT are true and correct to the best of my knowledge. I understand that false statements herein are made subject to the penalties of 18 Pa.C.S.A. Section 4904 relating to unsworn falsification to authorities.

By [REDACTED]

Dated: 6-11-00

Investigation Report
Vehicle: 1999 Ford Ranger 4X4
for
Eric Insurance Group

June 14, 2000

By

W. L. Davison
Warrendale, PA

WARRENDALE
JUN 15 2000

ER03-003-LC-0969

W. L. Davison Forensic Services, Inc.
Forensic Mechanical Evaluation
Origin and Cause of Vehicle Fires

Post Office Box 319
Warrendale, PA 15086
(724) 625-8210
(724) 625-6211 Fax

June 14, 2000

Erie Insurance Group
Post Office Box 516
Warrendale, PA 15086

RE: Our Assignment #: 00-106-WL
Insurance Claim #: [REDACTED]
Insured: [REDACTED]
Vehicle: Year - 1999
Make - Ford
Model - Ranger 4X4
Body Style - Ext. Cab Pick Up
Engine - V/6
Transmission - Automatic
VIN #: 1FTZR15X6X1 [REDACTED]
Mileage: 6745
Registration Plate: Not available
Date of Loss: 1/8/00
Type of Loss: Fire

As per your request a second examination of the above identified subject vehicle, a 1999 Ford Ranger, 4X4 pick up truck, bearing vehicle identification number (VIN) 1FTZR15X6X1 [REDACTED] was conducted. This examination was conducted at Stoystown Auto Wrecking, Stoystown, Pennsylvania on May 5, 2000. Also present at this examination was my assistant Leland J. Rodgers.

PURPOSE

The purpose of this examination was to recover the alternator and electrical wiring that was the cause of the vehicle fire, which occurred on January 8, 2000.

WARRENDALE
JAN 15 2000

ER05-005-LC-8978

Assignment #00-106-W1

Claim [REDACTED]

June 14, 2000

Page 2

PHOTOGRAPHIC DOCUMENTATION

Please note that it is an industry standard that all right and left designations are as viewed while being seated in the driver's area facing forward.



EN05-085-LC-0871

Photograph 1

This photograph is of the front of the subject vehicle, which displayed the West Plains Salvage and Skoytown Auto Wrecking stock number:

WEST PLAINS
SALVAGE & SKOYTOWN AUTO WRECKING

Assignment #00-106-W1
Claim # [REDACTED]
June 14, 2000
Page 1



Photograph of
This photograph is of the Federal Motor Vehicle Safety Standards label with a vehicle
identification number of 1F7ZK1A201A201010 and a manufacture date of 11/00

ER00-005-1-C-0072

RECEIVED
JUN 14 2000

Assignment #000,106,301
Claim [REDACTED]
June 14, 2000
Page 4



Photograph 3

This photograph is of the interior of the subject vehicle. No alterations to the interior had been performed since the original inspection on January 17, 2000.

ENR-025-LC-0073

Assignment #00-118-WL
Claim [REDACTED]
June 14, 2000
Page 5



Photograph 4

This photograph is of the interior of the subject vehicle. The line progression clearly indicates a fire that originated within the engine compartment of the vehicle. No alterations to the vehicle have been performed since the original inspection on January 17, 2000.

EP05-005-LC-0974

100-118-WL

100

Assignment #08E-106-WI

Claim

June 14, 2000

Page 6



Photograph 5

This photograph is an additional view of the interior of the subject vehicle. The fire progression clearly indicates a fire that originated within the engine compartment of the vehicle. No alterations to the vehicle have been performed since the original inspection on January 17, 2000.

ER03-003-LC-0173

5-3

Assignment #00-106 WI.

Claim [REDACTED]

June 14, 2000

Page 7



Photograph 6

This photograph is an additional view of the interior of the subject vehicle. The fire progression clearly indicates a fire that originated within the engine compartment of the vehicle. The alterations to the vehicle have been performed since the only wind direction on January 17, 2000.

ENR6-006-1C-B076

SEARCHED
SERIALIZED
INDEXED
FILED

Assignment #00-106-WI.

Claim [REDACTED]

June 14, 2000

Page 8



Photograph 7

The photograph is an additional view of the interior of the subject vehicle. The fire progression clearly indicate a fire that originated within the engine compartment of the vehicle. Repairs to the vehicle have been performed since the right-hand impact on January 12, 2000.

ERIS-025-1C-077

Assignment #00-106-WL
Claim [REDACTED]
June 14, 2000
Page 9



Photograph #

This photograph is of the alternate alternate blocks, and positive battery cable joint to
removed by this committee for preservation of evidence.

EROS-000-LC-0878

Assignment #003-100-W1

Claim

from 1-4, 2000

Page 10



Photograph 9

This photograph is an additional view of the air filter, air filter bracket, and positive battery cable prior to removal by the applicant for presentation of evidence.

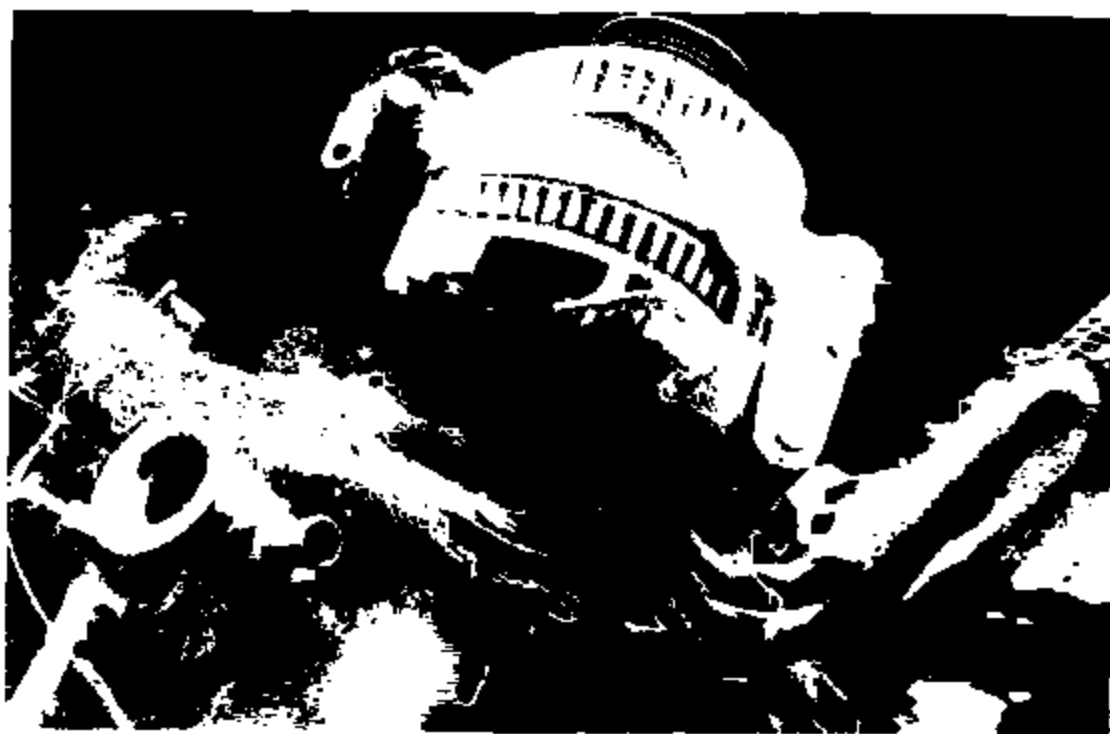
EM05-003-LC-8979

Assignment #10-106-W1

Claim [REDACTED]

Date: 11, 2000

Page 11



Photograph 10

The photograph is an additional view of the defendant, allegedly circled, and position of the defendant's hands, possibly to be used by the court for preservation of evidence.

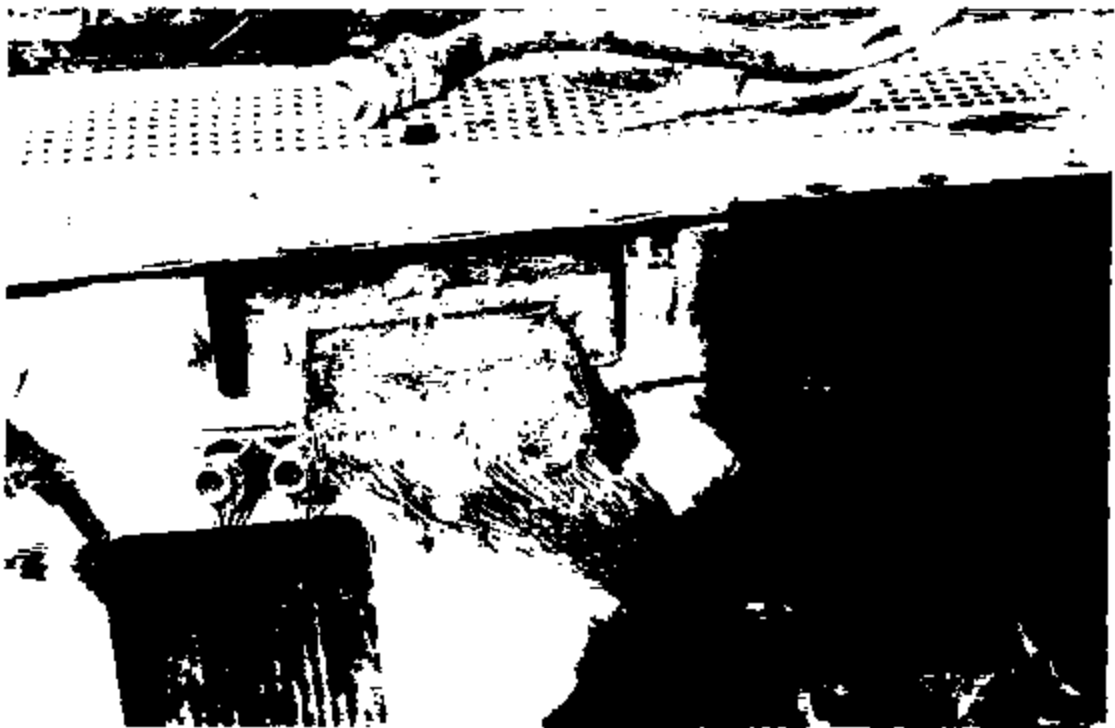
EP05-003-LC-0009

Assignment #00-106-W1.

Claim # [REDACTED]

June 14, 2000

Page 12



Photograph 11

This photograph is of the engine control module located at the engine bell test. Only evidence of environmental heating was noted.

EX03-005-10-0001

Assignment #00-106-WL

Claim

June 14, 2000

Page 13



ENR-005-LC-0002

Photograph 13

This photograph is of the equipment being used by the claimant to collect data on the condition of environmental hearing.

Assignment #001 (0x> WI.

Claim [REDACTED]

June 14, 2000

Page 14



Photograph 14

This photograph is of the electrical distribution area. No caution for the fire or fire
danger of any type was noted.

ENR-005-LC-0003

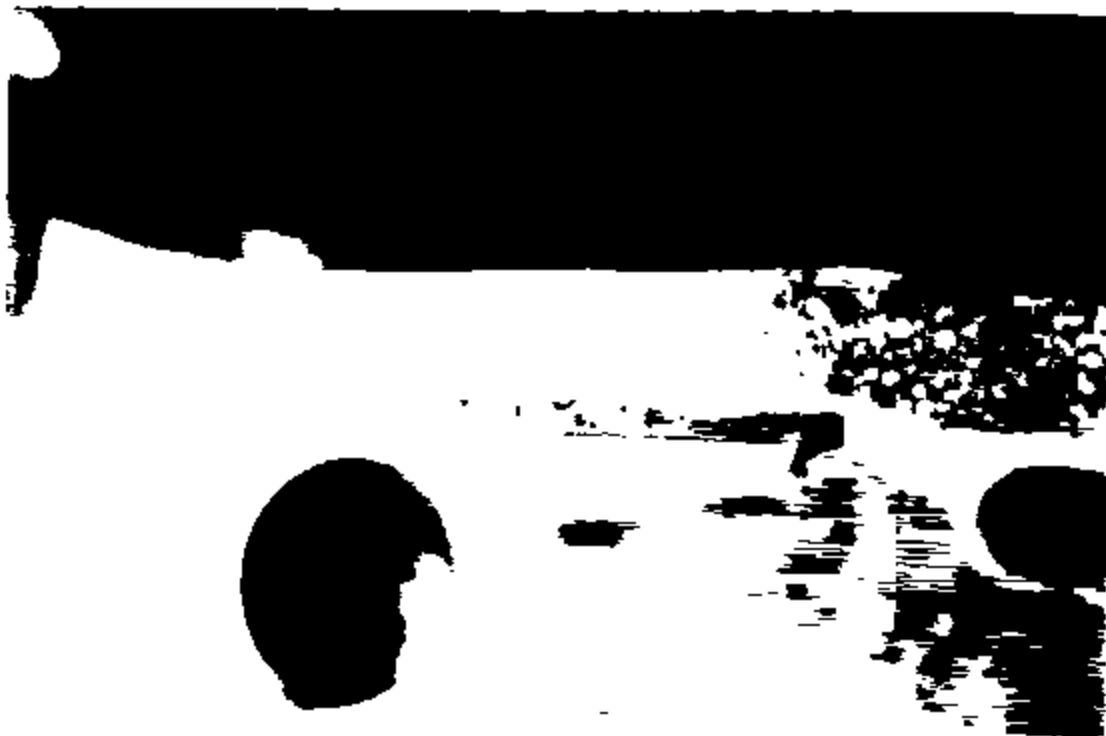
SEARCHED
SERIALIZED
INDEXED
FILED

Assignment #BX-116-WI.

Claim # [REDACTED]

June 14, 2000

Page 15



Photograph 11

This photograph is the transmission dipstick, which displayed a normal, low-diff, static condition.

EN03-083-LC-0584

RECEIVED
JUN 14 2000

Assignment #00-106-W1

Claim # [REDACTED]

June 14, 1967

Page 16



Photograph C

The photograph is of the engine oil dipstick. Water was present on the dipstick. This is a record of fire suppression or fire damage.

EP05-003-LC-0003



Photograph 16

This photograph is of the wire, which carries electrical current from the alternator to the battery. The red arrow indicates an area of the wire that displays evidence of heat. The wire has been fixed at this location.

ERMS-005-LC-0308

Assignment #00-106-WF.

Claim [REDACTED]

June 14, 2000

Page 18



ENC-005-LC-0007

Photograph 17

This photograph is an additional view of the same which is more obstructed than that of the other photographs to the left. The red surface is located in the area of the same that is given evidence of heat. The same has become level at this location.

Assignment #00-108-WL

Claim [REDACTED]

June 14, 2000

Page 19



Photograph 18

This photograph is an additional view of the wire, which carries electrical current from the alternator to the battery. The red arrow indicates a section of the wire that displays evidence of heat. This wire has become loose at this location.

ENG-000-1-C-0000

Assignment #XX-100-W1.

Claim # [REDACTED]

June 14, 2000

Page 20



Photograph P

This photograph is an additional view of the wire, which carries electrical current from the alternator to the battery. The red arrow indicates an area of the wire that displays evidence of heat. The wire has become fused at this location.

EX-100-100-1-C-0000

Assignment #00-106-W1.

Claims # [REDACTED]

June 14, 2000

Page 21



0000-000-10-0000

Photograph 20

The photograph is an additional view of the lined alternative wing.

Assignment #00-106-WL

Claim [REDACTED]

June 14, 2000

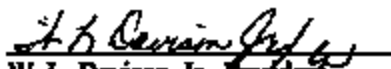
Page 22

OPINION

A second examination of the subject vehicle, a 1999 Ford Ranger, 4X4 pick up truck, bearing vehicle identification number 1FTZR15X6X[REDACTED] was conducted. This second examination included, but was not limited to the electrical wiring, fuel system, and engine compartment of the vehicle.

As a result of this examination, it is the studied opinion of this examiner, with a high degree of technical and professional certainty, that the causation for this fire was a high resistance at the alternator wire. This high resistance developed heating of the copper conductor to the extent that ignition of the insulating material occurred. After ignition, the fire developed in a normal fashion consuming the readily available combustible material.

If any additional information becomes available in this matter or if you have any further questions, please do not hesitate to contact me.



W. L. Davison, Jr., President

Certified Fire Investigator

ASE Certified World Class Technician

W. L. DAVISON FORENSIC SERVICES, INC.

WARRENDALE
JAN 15 2001

Investigation Report
Vehicle: 1999 Ford Ranger 4X4
for
Eric Insurance Group

February 21, 2000

By

W. L. Davison
Warrendale, PA

ERIS-003-LC-8992

W. L. Davison Forensic Services, Inc.
Forensic Mechanical Evaluation
Origin and Cause of Vehicle Fires

Post Office Box 319
Warrendale, PA 15086
(724) 625-6210
(724) 625-6211 Fax

February 21, 2000

Erie Insurance Group
Post Office Box 516
Warrendale, PA 15086

RE: Our Assignment #: 00-106-WL
Insurance Claim #: [REDACTED]
Insured: [REDACTED]
Vehicle: Year - 1999
Make - Ford
Model - Ranger 4X4
Body Style - Ext. Cab Pick Up
Engine - V/6
Transmission - Automatic
VIN #: 1FTZR15X6X [REDACTED]
Mileage: 6745
Registration Plate: Not available
Date of Loss: 1/8/00
Type of Loss: Fire

As per your request I have examined the above identified subject vehicle, a 1999 Ford Ranger 4X4 pick up truck, bearing vehicle identification number (VIN) 1FTZR15X6X [REDACTED]. This examination was conducted at West Penn Salvage, Adamsburg, Pennsylvania on January 27, 2000. Also present at this examination was my assistant Keith Stephan.

PURPOSE

The purpose of this examination was to determine the origin and cause of the vehicle fire, which occurred on January 8, 2000.

Assignment #00-106 WI

Claim [REDACTED]

February 21, 2008

Page 2

PHOTOGRAPHIC DOCUMENTATION

Please note that it is an industry standard that all right and left designations are as viewed while being seated in the driver's area facing forward.



Photograph 1

The photograph is of the front of the subject vehicle. Evidence for damage is apparent at the engine compartment area.

Assignment #00-100-W1

Claim [REDACTED]

February 21, 2009

Page 1



Photograph 2

This photograph is of the passenger side of the vehicle. Extensive fire damage is apparent at the engine compartment area. Smoke film has accumulated at the interior, floor to an

Assignment #00-106-WI.

Claim [REDACTED]

February 21, 2000

Page 4



Photograph 1

This photograph is an additional view of the passenger side of the vehicle. Extensive film damage is apparent at the edges, comparable to that shown by the film as mounted on its interior glass areas.

Assignment #00-106-WL

Claim [REDACTED]

February 21, 2000

Page 5



Photograph 1

This photograph is of the rear of the subject vehicle. The registration plate was displaced. No tire damage has occurred at this location.

EA05-005-LC-8897

Assignment #00-100-W1.

Claim [REDACTED]

February 21, 2000

Page 6



Photograph 5

This photograph is of the driver's side of the subject vehicle. A tire size change is apparent. The vehicle displayed West Penn Truck #01111.

Assignment #00-106-WI.

Claim [REDACTED]

February 21, 2000

Page 7



Photograph 6

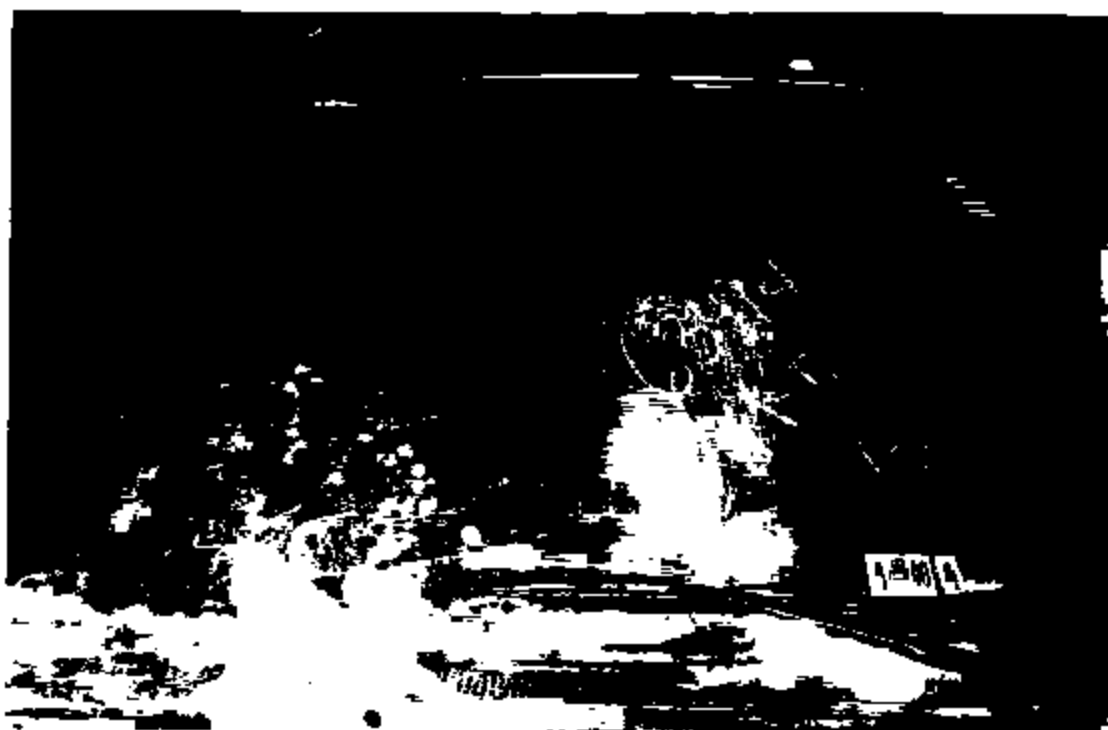
This photograph is of the driver's side, front fender area. Extensive fire damage is apparent at the engine compartment.

Assignment #00-100-W1.

Clair [REDACTED]

February 21, 2000

Page 8



Photograph 7

This photograph is of the windshield which displayed heat and smoke damage. The vehicle displayed West Point Mark, #2111. Also visible are the Powerstroke Motor, Fuel and Emission stickers visible through the front mouth of the year 2000.

Assignment #001-106-WC

Claim [REDACTED]

February 21, 2000

Page 9



Photograph B

This photograph is of the dash panel and engine bulkhead as viewed from the driver's side of the vehicle. The burn patterns present clearly indicate a fire, which originated in the area of the engine compartment.

Assignment #00-106-WI,
Claim [REDACTED]
February 21, 2000
Page 10



Photograph D

This photograph is an additional view of the dash panel and engine backboard as viewed from the driver's side of the vehicle. The four pattern pieces of clearly indicate a tip which originated at its base of the engine compartment.

Assignment #00-106-WL

Case # [REDACTED]

February 21, 2000

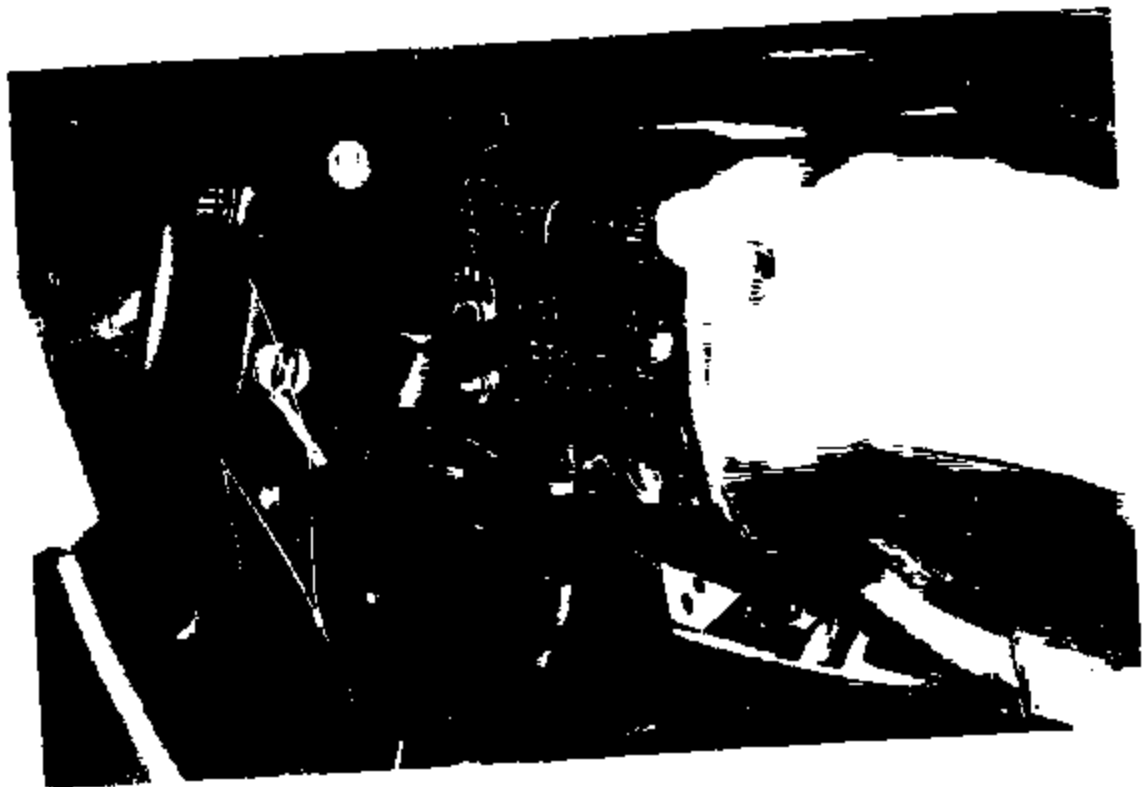
Page 11



Photograph 10

This photograph is of the instrument panel and engine bulkhead as viewed from the passenger side. The burn patterns present indicate a fire path that has progressed from the engine compartment into the interior of the vehicle via the heater and air conditioning ductwork.

Assignment #00-118-WL
Claim [REDACTED]
February 21, 2000
Page 12



Photograph 11
This photograph is of the steering column and original equipment radio, which has
sustained only slight bent and metal damage.

Assignment #00-106-W1.
Claim # [REDACTED]
February 21, 2000
Page 13



Photograph 12

This photograph is of the accumulation of debris that displayed 6.75 miles traveled

Assignment #00-100-WL

Claim

February 21, 2000

Page 14



Photograph 13

This photograph is of the glove box and dash panel, which display burn patterns that substantiate a fire that originated within the engine compartment and progressed into the interior of the vehicle through the heater and air conditioning ducts.

Assignment #00- (00-W1

Claim

February 21, 2000

Page 15



Photograph 14

This photograph is an additional view of the glove box and dash panel which display burn patterns that substantiate a fire that originated within the engine compartment and progressed into the interior of the vehicle through the heater and air conditioning ductwork.

Assignment #00-106-WI.

Claim

February 21, 2000

Page 16



Photograph 15

This photograph is an additional view of the glove box and dash panel, which display fire patterns that substantiate a fire that originated within the room, expanded and progressed into the interior of the vehicle through the leader and an unconditioned ductwork.

Assignment #001-106-WI

Claim # [REDACTED]

February 21, 2000

Page 17



Photograph 16.

This photograph is of the driver's side of the engine compartment where extensive fire damage has occurred. The electrical system of the vehicle had sustained extensive damage.

Assignment #08-106-WI
Claim # [REDACTED]

February 21, 2008

Page 18



Photograph 17

This photograph is an additional view of the driver's side of the engine compartment where extensive fire damage has occurred. The electrical system of the vehicle had sustained extensive damage.

Assignment #00-106-WL

Claim [REDACTED]

February 21, 2000

Page 19



Photograph 18

This photograph is an additional view of the driver's side of the engine compartment where extensive fire damage has occurred. The electrical system of the vehicle has sustained extensive damage.

Assignment #00-106-W1.

Claim

February 21, 2000

Page 20



Photograph 19

The photograph is of the electrical wiring located to the rear of the battery and in the space made up of the electrical distribution panel. A large amount of the connecting material of the electrical wiring had been consumed.

Assignment #00-106-WL

Claim

February 21, 2000

Page 21



Photograph 20

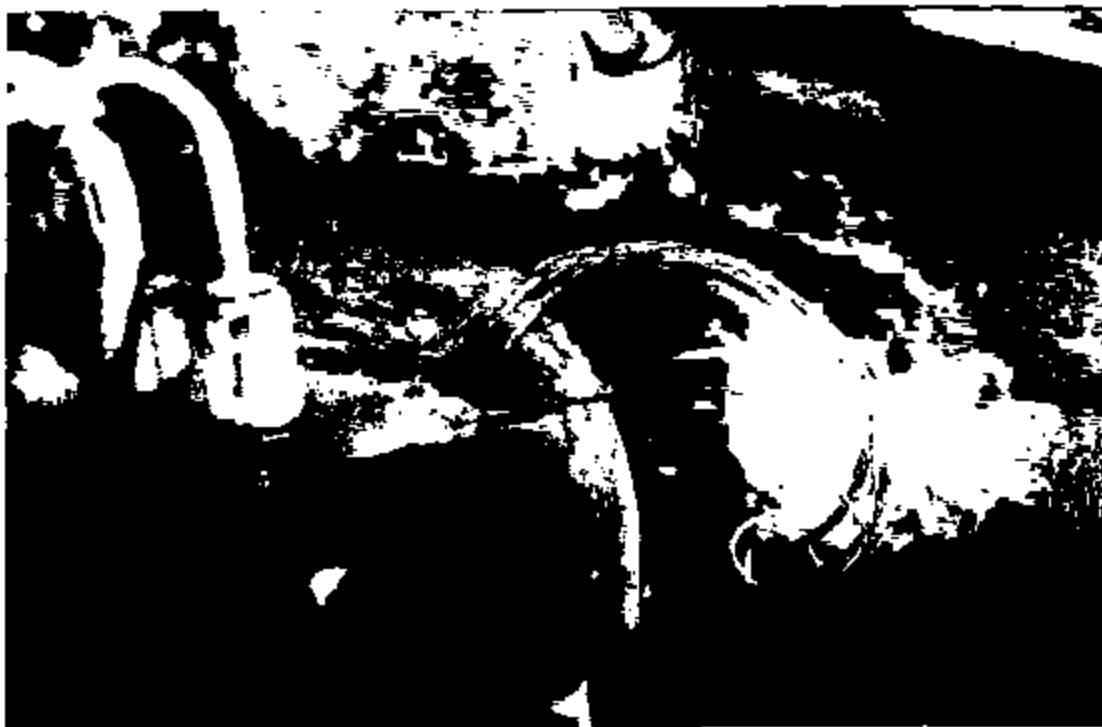
The photograph is an additional view of the electrical wiring located to the rear of the battery and in the approximate area of the electrical distribution panel. A large amount of the insulating material of the electrical wiring had been concealed.

Assignment #XX-100-W1.

Claim #

February 21, 2000

Page 22



Photograph 21

This photograph is an additional view of the electrical wiring located to the rear of the battery and in the approximate area of the electrical distribution panel. A large amount of the insulating material of the electrical wiring had been removed.

Assignment #00-106-W1.

Claim

February 21, 2000

Page 23



Photograph 27

This photograph is of the passenger side of the engine compartment. Extensive damage is apparent. The large-gauge copper wiring of the alternator supply cable had any insulating material. The red arrow indicates this wire.

Assignment #00-1008-WL
Claim # [REDACTED]
February 21, 2000
Page 24



Photograph 24

The photograph is an oblique view of the large gauge copper wire, which is marked and
by the red arrow.

Assignment #00-106-WJ

Claim # [REDACTED]

February 21, 2000

Page 25



Photograph 21

This photograph is of the alternator supply wire that has welded itself to the top of the coil of the alternator, indicating this case of contact.

Assignment #00-106-W1

Claim # [REDACTED]

February 21, 2000

Page 20



Photograph 19

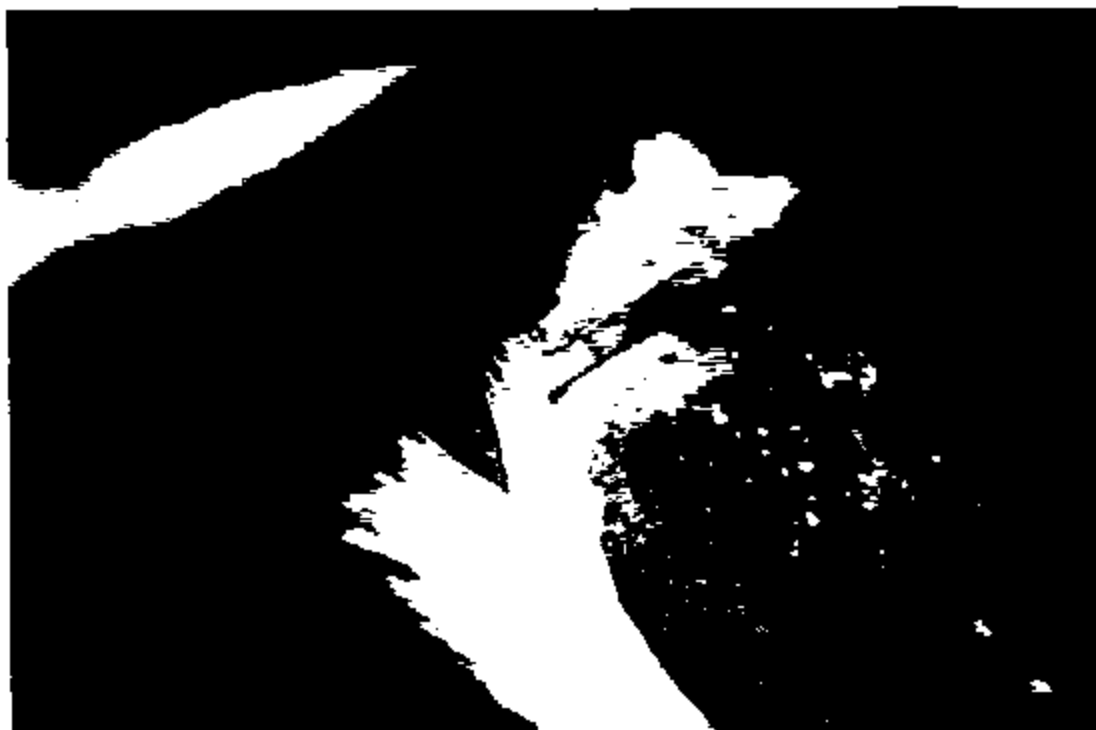
This photograph is an additional view of the aluminum support base that has been attached to the metal bracket. The red arrows indicate the area of interest.

Assignment #00-106-W1

Claim [REDACTED]

February 21, 2000

Page 27



Photograph 2

This photograph is an additional view of the referenced empty metal band (see 00-106-W1) to the metal band (1). The red arrows indicate the area of concern.

Assignment #00-146-W1
Claim [REDACTED]

February 21, 2000

Page 28



Photograph 27

This photograph is an additional view of the alternate supply wire that has been clipped to the metal band of [REDACTED]. The text above indicates the wire is a contact.

Assignment #00-106-WI,
Claim [REDACTED]
February 21, 2000
Page 20



Photograph 22

This photograph is an additional view of the 206 control supply side that has been added to B to the metal bracket. The red arrows indicate the correct location.

Assignment #00-106-W1.

Claim #

February 24, 2000

Page 30



Photograph 20

This photograph is an additional view of the alternate supply pipe that has a 90-degree fit to the metal beam (4). The red arrows indicate the direction of flow.

Assignment #00-106-W1.

Claim [REDACTED]

February 21, 2000

Page 31



Photograph 31

This photograph is an additional view of the defendant's face and has no bearing on the social benefit of the defendant's activities. The redaction indicates the removal of the defendant's face.

Assignment #00-106-W1
Clair ██████████
February 21, 2000
Page 12



View sample 1

The photographs are additional views of the defendant's appearance. The defendant is identified in the photographs. The defendant's name is [REDACTED].

Assignment 800-106 WL
Claim
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The following information is provided for your information only. It is not intended to be used as a substitute for a professional opinion or advice. The information is provided for your information only. It is not intended to be used as a substitute for a professional opinion or advice.

EXEMPLAR VEHICLE

EA05-085-LC-0028

Assignment #000-100-WL
Claimant [REDACTED]
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Photograph 11
The photograph is a view of the official entrance to the building, showing
the entrance of the building.

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Class [REDACTED]
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Paragraph 11

Paragraph 11: The person of the address of my source was in the
of my source. The person of the address of my source was in the

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FINDINGS / OPINION

An initial examination of the subject vehicle, a 1999 Ford Ranger bearing vehicle identification number 1FTZR15X6X [REDACTED] was conducted. This examination included, but was not limited to the fuel, exhaust, electrical, and emissions systems of the vehicle.

As a result of this examination, it is the studied opinion of this examiner, with a reasonable degree of technical certainty, that the fire, which occurred on January 8, 2000, was the result of a high resistance within the electrical circuitry of the vehicle. This high resistance within the electrical system was to the extent that insulating material of the electrical wiring and nearby combustible material was ignited. After ignition, the fire progressed in a normal upward and outward fashion consuming the readily available combustible material until extinguished. One of these combustible materials was the fiberglass/plastic heater and air conditioning ductwork. Ignition of this material aided the spread of the fire into the interior of the vehicle.

As no disassembly of any type was conducted at the time of this examination, an exact cause for this fire cannot be determined at this time.

Due to the year and limited mileage of the vehicle, I would suggest that subrogation possibilities be considered. When Ford Motor Company or any other interested party conducts any other examination of the vehicle, I would strongly suggest that a representative of your firm or W. L. Davison Forensic Services, Inc. be present to view this examination.

If any additional information becomes available in this matter or if you have any further questions, please do not hesitate to contact me.



W. L. Davison, Jr. President

Certified Fire Investigator

ASE Certified World Class Technician

W. L. DAVISON FORENSIC SERVICES, INC.