[redacted]

414 Commerce Drive * Suite 100 * Fort Washington, PA 19034

CONSUMER AFFAIRS SECTION March 26, 2002

Jack G & Lourene Robinson
113 Bald Mountain
Wilkes-barre, PA 18702-9538

2 APR -3 A11:32

FORD MOTOR COMPANY RECEIVED CLAIMS UNIT APR - 4 2002 OFFICE OF THE GENERAL COUNSEL

OUR INSURED: [redacted]
OUR CLAIM NUMBER: [redacted]
DATE OF LOSS: 03-23-2002

99 FORD RANGER X
VIN # 1FTZR15X9X[redacted]

To Whom It May Concern,

Please be advised that I represent Nationwide Insurance Company. The above vehicle was involved in a vehicle fire, which resulted from an alleged defect. The fire occurred on 03-23-2002 in the engine compartment.

In order to determine the cause of the vehicle fire, including a determination as to whether any defect in the vehicle was in existence at the time of the fire, an inspection and testing of the vehicle will be conducted by North Eastern Technical Services, Inc. an authorized representative of the above. This inspection will take place at Copart 2704 Geryville Pike Pennsburg, PA 18073 in ten days.

As you may have an interest in this matter, from both a safety precaution standpoint and as potential defendants in litigation, you are invited to have an expert attend and participate in the inspection and testing procedures.

To coordinate the inspection date and time, please contact North Eastern Technical Services, Inc. at (508) 675-0999 within ten days of receipt of this letter. Should you have any questions pertaining to this matter, or wish to discuss the same in further detail, you may contact the undersigned at the number below.

I would like to caution that should your expert fail to appear at the inspection, you will forfeit any right to subsequently claim prejudice/spoliation under Nally vs. Volkswagen of America, Inc., 405 MASS 191 (1989).

NATIONWIDE MUTUAL INSURANCE COMPANY

E005-005-LC-9031

Marcin Lubaczewski (PA-20-FWAS)
Claims Department
(215)619-4618

MASA Inc.
FIRE & LOSS CONSULTANTS

M. A. STRINGER & ASSOCIATES, INC.

2805 Division Street • Suite 101 • Metairie, Louisiana • 70002

(504) 454-0466 • FAX (504) 454-0458

January 18, 1999

Ms. Mary Walters, Claim Specialist
State Farm Insurance Company
4811 Harding Boulevard
Baton Rouge, Louisiana 70811

RE: Fire Analysis Report
Insured: [redacted]
Address of Loss: I-10 at Prarieville Exit
Prarieville, Louisiana
Date of Loss: 12-09-98
Claim Number: [redacted]
MASA Contract Number: 12983070M

Dear Ms. Walters:

In response to the December 15, 1998 request of Ms. Kay Walters, Claim Specialist, State Farm Insurance Company, Baton Rouge, Louisiana, M. A. Stringer and Associates, Incorporated (MASA) has examined and analyzed the above captioned vehicle fire loss. The vehicle was carefully examined on December 18, 1998 by Mervin A. Stringer, MASA Chief Fire Specialist, at which time photographs were taken, some of which are included at the end of this report with the remainder being retained in the MASA file.

It was reported the vehicle was run off the road by another vehicle and subsequently collided with a tree causing impact damage to the right front fender. As the operator was being loaded into an ambulance she saw a fire from the area of the engine compartment. The vehicle, a 1998 Ford Explorer, had been purchased new on July 16, 1998 and had less than 7,000 miles on the odometer. An internet search of the National Highway Transportation Safety Administration (NHTSA) Office of Defects Investigation Recall Database showed only one fire related recall dealing with the use of the stainless steel fuel line braid as a ground for jump starting the vehicle. This recall does not appear to be relevant in this instance.

Figures 1 through 7 are exterior views of the vehicle and as can be seen there is impact damage to the rear of the right front fender, as shown in Figures 2, 3 and 4. Figure 8 is a view of the Vehicle Identification Number (VIN) and Figure 9 shows the vehicle's license plate. Figure 10 is a view of the rear storage area, Figure 11 is a view of the interior from the rear, Figures 12 and 13 show the front and rear seats as viewed from the left side and Figures 14 and 15 show the front and rear seats as viewed from the right side. Figure 16 is a front view of the engine compartment from above and Figure 17 is a left side view. As can be seen the fire damage is severe throughout the entire vehicle, however, the overall damage gradients and burn patterns indicate the fire originated in the right side area of the engine compartment. Figure 18 is a view of the engine compartment from the right side with the impact damage to the rear of the right front fender clearly seen in the lower left. Figures 19 and 20 are views of the right rear area of the engine compartment, the area adjacent to the impact damage, and the remains of what appears to be a canister from the air condition system.

Figures 21 through 24 show the engine oil dipstick and transmission fluid dipsticks showing adequate levels for the normal operation of the vehicle. Figure 25 is an overview of the engine after the removal of the loose debris and examination of the electrical wiring, also shown in Figures 26 and 27. No evidence of any arcing or shorting was found, however, not all of the electrical system remained intact for examination. Figure 27 also shows the remains of the aforementioned air conditioner canister, which was wedged under the top of the coil spring retainer, as shown in Figures 28 and 29. Also note the vehicles exhaust system is located in this area. Figure 30 is a view of the front interior of the vehicle after the removal of the driver's side floor debris. Portions of the vehicles floor mat were still somewhat intact and no unusual odors were detected.

As can be seen in a study of the figures the damage gradients and burn patterns show the fire originated in the right front area of the engine compartment, in the area where a canister for the air conditioning system had been displaced and wedged under the coil spring retainer. The displacement of this canister would have resulted in the freon and oil in the air conditioning system being expelled and the contact of the oil with the hot exhaust manifold could result in ignition of the oil. The facts, circumstances and physical evidence indicate that this is the most probable cause for this fire.

Based on the results of the investigation conducted by MASA, as set forth in this report, it is the opinion of M. A. Stringer and Associates, Incorporated that the December 12, 1998 fire in the Robert and Kriste Rispone 1998 Ford Explorer vehicle originated in the right front area of the engine compartment and was caused by impact damage that displaced a canister containing a combustible fluid that was ignited by the heat of the exhaust system.

MASA appreciates the opportunity to be of service to you and State Farm Insurance Company in this matter. If we can be of additional assistance in this or other matters, please do not hesitate to contact us.

Sincerely,

M. A. Stringer and Associates, Inc.

Mervin A. Stringer
Chief Fire Specialist

Ted K. Kaplon, P.E.
Consulting Engineer

MAS/ls

Original and One Copy

Ms. Mary Walters, Claim Specialist
State Farm Insurance Company
4811 Harding Boulevard
Baton Rouge, Louisiana 70811

Report Copy

MASA File

RECEIVED
JAN 21 1999
NBR CLAIMS

ER05-005-LC-0035

Figure 1

Figure 2

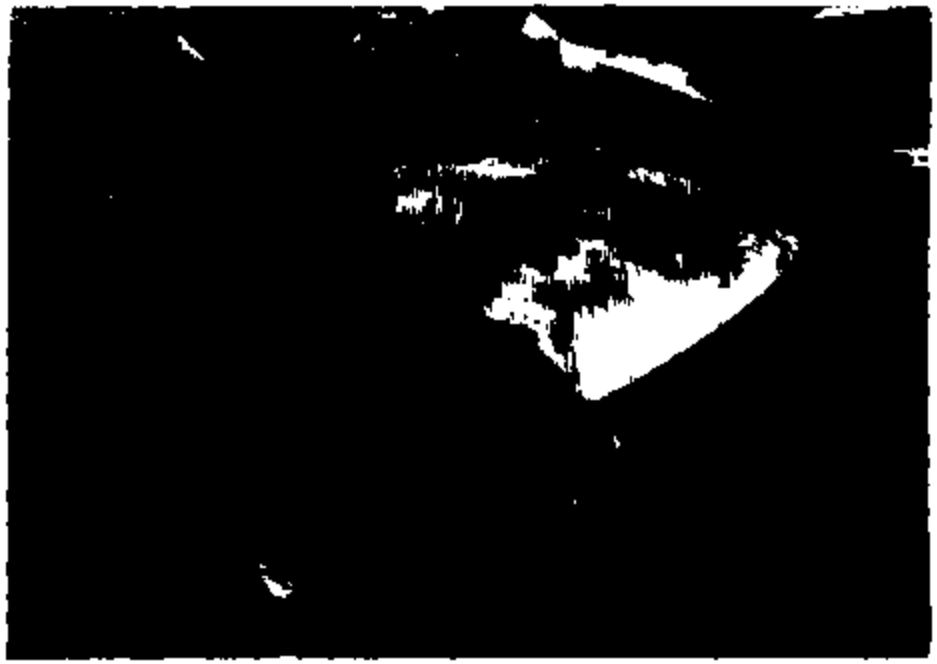


Figure 3

Figure 4

Figure 5

Figure 6

Figure 7

Figure 8

Figure 9

Figure 10

Figure 11

Figure 12

Figure 13

Figure 14

Figure 15

Figure 16

Figure 17

Figure 18

Figure 19

Figure 20

Figure 21

Figure 22

Figure 23

Figure 24

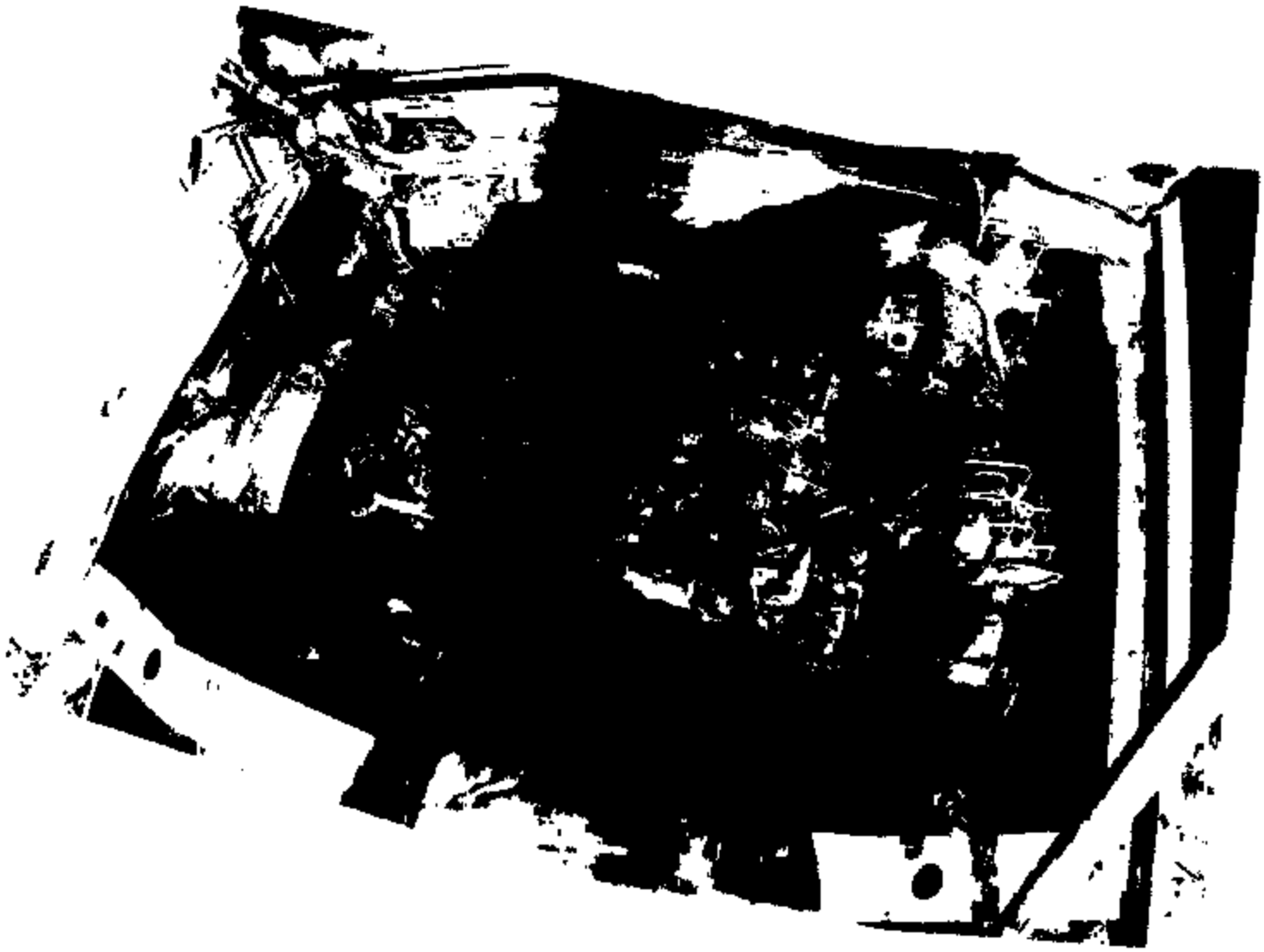


Figure 26

Figure 26

Figure 27

Figure 28

Figure 29

Figure 30

Citation No. 6317524 | Veh. 1 | Veh. 2 | F.S. Cit. Code, Rev. 32:79

STATE OF LOUISIANA
UNIFORM MOTOR VEHICLE TRAFFIC ACCIDENT REPORT

Investigating Agency: ☒ State Police ☐ City Police ☐ Sheriff ☐ Other

Photographs Taken: ☐ Yes ☒ No Hit and Run: ☐ Yes ☒ No

83107 23

TIME — Date of Accident: December 9, 1998 — Day of Week: Wednesday — 0735

005271

83107 23

LOCATION

Parish where accident occurred: Avoyelles — City, Town: N/A

Accident occurred on: I-10 WB — 171 — 4/4 — Troop Number or District and Zone: A

☐ At its intersection with

☐ Relative to its intersection with ____ feet ____ of ____

☒ Not at intersection 4 tenths of mile ____ of I-173

On Interchange, Identify Ramp: ☐ NE ☐ SE ☐ NW ☐ SW

Hit and Run: ☐ Yes ☒ No

VEHICLE 1

Year: 1985 — Make: Chevy — Model: Cabrica — Body Type: 4 DR — No. Occ.: 2 — Color: 4 — VIN: 1GILD64XSY [redacted]

Vehicle Disabled: ☐ Yes ☒ No — Removed by: Rolls Wrecker — License Plate: 00 — State: LA — Type: Private — Number: ECF 163

Trailer Description: N/A — Make: ____ — Type: ____ — License Plate: ____ — Year: ____ — State: ____ — Number: ____

Agent's Name: Unknown — Address: [redacted] — Phone No.: Unknown

Insurance Co. Name: ACE Illinois National — Policy: [redacted] — Expiration: 10-1-99

Owner's Name: [redacted] St Amant LA [redacted]

Operator's Name: Same — [redacted] — Number Injured: 0

Damage Scale: None

Company's Name and Address: None

Area Damaged	Force	Position	Location	Safety Equipment	Injury
C D E B F A G L H K J I	1 Light 2 Moderate 3 Heavy 4 Total 5 Fire 6 Submerged 7 Underdriven	1 Front Left 2 Front Center 3 Front Right 4 Rear Left 5 Rear Center 6 Rear Right 7 Damage of Spec. Ext. 8 Unknown	1 Not Applied 2 Possibly Applied 3 Totally Applied 4 Unknown 5 Other	1 Air Bags 2 Passive Restraints 3 Child Restraints 4 Helmet & Face Shield 5 Helmet Only 6 Eye Protection Only 7 None	1 Fatal 2 Critical Non-Fatal 3 Serious Non-Fatal 4 Severe 5 Moderate 6 Minor 7 No Injury

VEHICLE 2

Year: 1992 — Make: Ford — Model: Explorer — 4 DR — No. Occ.: 2 — Color: 4 — VIN: 1FMZU32E7NUA [redacted]

Vehicle Disabled: ☐ Yes ☒ No — Removed by: Hooks Wrecker — License Plate: 00 — State: LA — Type: Private — Number: [redacted]

Trailer Description: N/A — Make: ____ — Type: ____ — License Plate: ____ — Year: ____ — State: ____ — Number: ____

Agent's Name: Al Phillips — Address: Unknown — Phone No.: (504) 654-0012

Insurance Co. Name: State Farm — Policy: [redacted] — Expiration: Unk

Owner's Name: [redacted] Enterprise Inc Hensenville LA

Operator's Name: [redacted] Enterprise Inc Hensenville LA — [redacted] — Number Injured: 1

Damage Scale: 4 4 3

Company's Name and Address: None

Clothing: ☐ Light ☐ Dark

Injury: ____ — Age: ____ — Sex: ____

Name and Address: N/A

Ambulance Company Unit: 911 — Arrived: 0744 — Left: 0757 — Hospital: CHRP — Name of Attending Physician: Sam Beth Collins

Injured Taken by: Medical Ambulance — Injured Taken to: Bunkie General Hospital

Alcohol Test: Results: Yes ____ No ____ — Refused ☐ — Blood ☐ Breath ☐ Urine ☐

Drug Test: Results: Yes ____ No ____ — Refused ☐ — Blood ☐ Urine ☐

Video Taped: ☐ Yes ☒ No

Time of Notification: 0745 — Time Officer Arrived: 0745 — Officer's Name: R. Elliot 101 — Badge No.: ____ — Unit: ____ — Shift: ____ — Date: ____

Supervisor Notified: ☐ Yes ☒ No — Supervisor's Name: T.R.L. Smith 101 — Badge No.: 7SLA — Unit: ____ — Date: 12-9-98

EA85-005-LC-9055

VIOLATIONS (Check One Per Column)

MOVEMENT PRIOR TO ACCIDENT (Check One Per Column)

VISION OBSCUREMENTS (Check One Per Column)

CONDITION OF DRIVER AND PEDESTRIAN (Check One Per Column)

PEDESTRIAN ACTIONS (Check One)

TRAFFIC CONTROL CONDITIONS (Check One Per Column)

REASON FOR MOVEMENT (Check One Per Column)

ROAD SURFACE (Check One Per Column)

LIGHTING (Check One)

ALIGNMENT (Check One)

VEHICLE CONDITION (Check One Per Column)

ROADWAY CONDITION (Check One)

WEATHER (Check One)

TRAFFIC CONTROL (Check One Per Column)

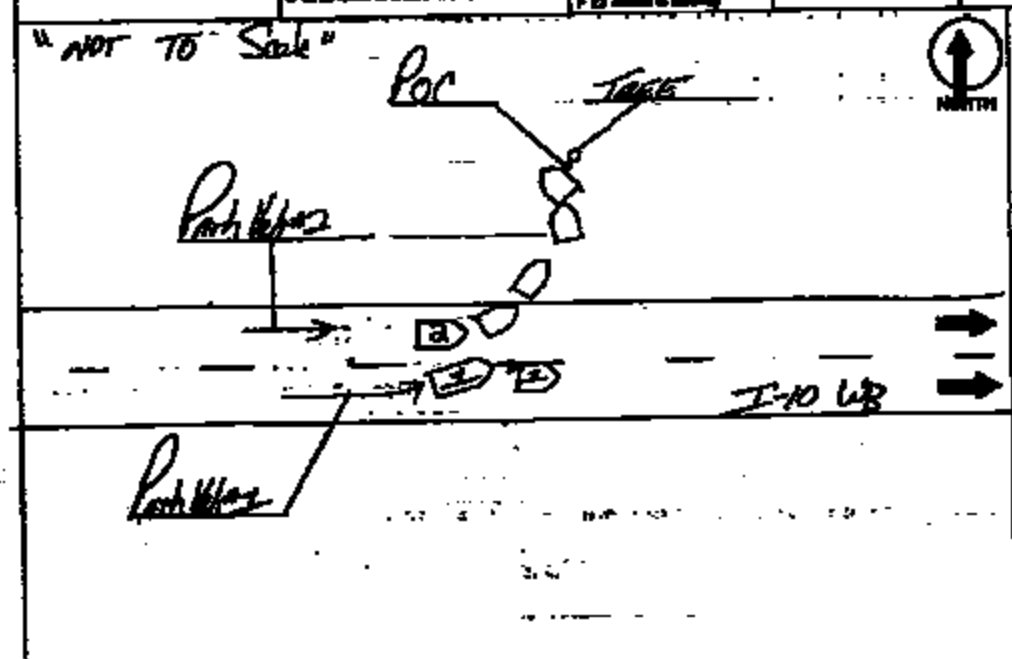
TYPE OF ROADWAY (Check One)

VEHICLE LIGHTING (Check One Per Column)

KIND OF LOCATION (Check One)

CONTRIBUTING FACTORS

LOCATION OF ACCIDENT – POINT OF IMPACT (Check One Per Column)



Veh	Direction of Travel Prior to Accident	Traffic Control Device Present	Damaged Area	Point of Impact	Vehicle Moved After Impact	Speed Estimate	Speed Limit	Damaged Area			
1	WEST	I-10	NONE	MAJED	None	70	70				
2	WEST	I-10	TREE	n/a	OFF Roadway	None	65	70			

Driver Veh #1 Stated She was Travelling WEST on I-10 WB L.A.R. Driver 2 Stated as She Started To Switch from outside lane to Inside Ln. She did not. See Veh #2. Driver 1 Stated when She noticed Veh #2 She Swerved Twice the outside Ln. Driver 1 Stated She heard Veh #2 Brakes and observed the outside side of the Roadway. Driver Veh 2 Stated She was Travelling WEST on I-10 in the Inside Ln. Driver 2 Stated Veh #1 Swerved to Change Lanes or which Time She Swerved Not to hard Veh #1. Driver 2 Stated the side of the Roadway was Sand & Tree with the Passenger Side of the Vehicle.

EAGS-005-LC-9256

FARMERS

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

06/03/2005

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

Re: Our Insured: [redacted]
Loss Date: 05/14/2005
Claim Number: [redacted]
Total Amount Owed: $7,384.85

Dear Sir or Madam,

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

You will find this correspondence and its enclosures contain substantive information and support adequate for your firm to make a decision concerning your liability.

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

Our insured's 1997 Ford Expedition, VIN 1FMFU18L1V[redacted] caught fire damaging our insured's
driveway and some personal property. According to the enclosed cause & origin report, the origin of the fire was at the power distribution box in the left rear of the engine compartment. It was a catastrophic short between the power feed wire to the power distribution box and a metal bracket.

Your product did not meet the expectations of my insured, the consumer. Your product failed and caused the loss resulting in damages of 7,384.85. Attached are documents substantiating payment.

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

Sincerely,
Fire Insurance Exchange

Allison Herrera

Allison Herrera
Property Subrogation Representative
512-238-5730
allison.herrera@farmersinsurance.com
ENCLOSURES

FORENSIC AUTOMOTIVE

P.O. BOX 22633
DENVER, COLORADO 80222
(303) 758-3555

June 1, 2005

Michael Kindig
Farmers Insurance Co.
7535 E. Hampden Ave. Suite 302
Denver, Co. 80231

Re: Insured – [redacted]
Claim # -
Date of loss –05/14/05
Our file # 3060 RM

Dear Mr.Kindig,

Per your request, we have made an inspection of a 1997 Ford Expedition bearing VIN # 1FMPU18L1[redacted]ed having an odometer reading of unknown miles.

The purpose of our inspection was to determine the origin and cause of the vehicle fire that occurred May 14, 2005.

For this inspection, we were provided with or obtained the following information, materials and/or inspections:

1. Physical inspection of the vehicle at Cozy Corner Towing, 155 S. 120th St., Lafayette, Co. 06/23/05.
2. Research of National Highway Transportation Safety Administration (N.H.T.S.A.) website
3. Research of wiring diagrams
4. Oil analysis – Titan Labs, 1380 Zuni St., Denver, Co.

BACKGROUND:

According to the information provided by your office, the insured had parked the vehicle in his driveway approximately 30 minutes prior to a neighbor noticing that the vehicle was on fire.

OBSERVATIONS:

1. The vehicle is a 4-wheel drive SUV equipped with a fuel-injected 5.4L V8 engine coupled to an automatic transmission and transfer case.

2. Exterior damage is heaviest to engine compartment and grille. The aluminum alloy hood was consumed except for a small section at the right rear above the location of the battery. The entire plastic grille was consumed. The paint is burnt off approximately half way back on the right front fender. The right inner fender liner was partially melted and the right front tire was slightly damaged by the heat and flames, but still held air. All of the paint was burnt off of the left front fender except part of the trailing edge. Part of the left front door adjacent to the mirror was also damaged. The left front tire was burnt and flat. The windshield is heavily damaged from the lower left corner as the flames impinged the passenger compartment. All of the remaining glass and body panels are intact.

3. Interior damage is heavy on top of the left side of the dash. The flame travel from the dash can be observed up to the visors and headliner. The plastic overhead HVAC control panel is melted and hanging down by its wiring harness. The damage decreases toward the rear. A large amount of drop-down was noted under the dash on the left front floor. The seats and remainder of the interior are only slightly smoke damaged.

4. All of the engine compartment accessories are present and correctly located. The battery is mounted near the right rear corner of the engine compartment. A section of the aluminum hood remains over the battery. The lead battery posts are melted and the plastic battery case consumed. A large portion of the aluminum radiator was consumed in the center. The plastic and rubber components located in the engine compartment were consumed including the fuel lines.

5. The battery cables are fire damaged but do not exhibit evidence of a catastrophic short. Two primary wires from the battery to the starter solenoid are rigid but not shorted. The alternator output wire is fire damaged but not shorted. A major voltage supply wire traverses the rear of the engine compartment terminating at the power distribution box in the left rear corner. This wire is shorted against the metal bracket of the power distribution block. The wire strands are partially fused to the metal bracket. A large amount of oxidation and clean-burn is present along the left inner fender.

6. Laboratory analysis of an engine oil sample taken from the crankcase revealed normal wear metals and is positive for water contamination from extinguishment. A sample from the transmission revealed high lead and tin from extended service. The metals originate from wear on bushings and/or thrust washers.

CONCLUSIONS:

In conclusion, based upon my education, experience and background, it is my professional opinion that the origin of the fire is at the power distribution box in the left rear of the engine compartment as evident by the fire burn patterns, flame travel, and decreasing damage away from this area.

The cause of the fire was determined to be a catastrophic short between the power feed wire to the power distribution box and a metal bracket. The wire is partially fused to the bracket where it grounded. The first material ignited was the insulation on the shorted wire.

Other systems, such as the fuel, ignition, or exhaust system were not involved, as the vehicle was not being operated at the time of the fire.

No related information was obtained through research of safety recalls, T.S.B's., or defect investigations. Seven possible related consumer complaints were discovered on the N.T.H.S.A. website, however details of the fires and the investigations are not available on the site. Copies of the complaints are included for your review.

Oil analysis is a rapid screening method for internal wear but still requires teardown for confirmation.

Our File No. 3060FM
Page 3

Enclosed is a series of photographs pertaining to our inspection along with a statement for services rendered.

Very truly yours,

James (Rob) Myers
ASE Master Auto & Truck Technician
ASE Certified Engine Machinist
ASE Certified Collision Repair Technician

JRM/dy
ENCL

**********NOTICE**********

IF ANY PARTS OR ITEMS WERE RETAINED PERTAINING TO THIS CASE, THEY WILL BE DISPOSED OF AFTER 6 MONTHS FROM THE DATE OF THIS REPORT. THIS ENTIRE REPORT AND FILE WILL BE DESTROYED AFTER 3 YEARS FROM THE ABOVE DATE, UNLESS WRITTEN NOTICE IS RECEIVED BY FORENSIC AUTOMOTIVE, AT:

P.O. BOX 22283, DENVER, CO 80222
FAX (303) 388-2107
NO FURTHER NOTIFICATION WILL BE MADE

Mountain View FPD Incident Report

Printed: 5/14/2005 4:08:07 PM

Run #	Reporting Person	Date	Dispatch	Arrive/Cancel	In Service	Response	On Scene
0949	Bennett, Cody	5/14/2005	14:11	14:22	14:54	11	32

8317 Pawnee Ln, , CO 0

Occupant:

Location:

MAPREF: La

Situation Found:

- ☐ Structure Fire
- ☑ Vehicle Fire
- ☐ Tree/Brush/Grass Fire
- ☐ AG Burn Attended
- ☐ AG Burn Not Attended
- ☐ Smoke Investigation
- ☐ Fire Alarm
- ☐ Trash Fire
- ☐ Electrical Fire
- ☐ Alt/Gas Leak Fire
- ☐ Explosion Fire
- ☐ Other Fire
- ☐ Hazmat
- ☐ Standby/Release
- ☐ MVC w/ Injuries
- ☐ MVC w/o Injuries
- ☐ Emergency Medical Call
- ☐ Service/Assist Call
- ☐ Standby
- ☐ Unable To Locate
- ☐ Cancelled In Route
- ☐ Mutual Aid Given
- ☐ Mutual Aid Received

Entity:

Of Alarms 0

- ☐ Supplemental Report
- ☐ Refer To Investigation

Ignition Factor:

- ☐ Incendiary
- ☐ Mechanical Failure
- ☐ Reckless
- ☐ Construction Deficiency
- ☐ Misuse Of Heat
- ☐ Natural Condition
- ☐ Other

Action Taken:

- ☐ Investigate Only
- ☐ Medical Assist Transport
- ☐ Medical Assist No Transport
- ☑ Extinguishment
- ☐ Remove Hazard
- ☐ Fill In/Move
- ☐ Outside Agency Transport
- ☐ Extrication
- ☐ Standby
- ☐ Not Classified
- ☐ Salvage
- ☐ Undetermined

Participation:

Aerial:	0
Ambulance:	1
Brush:	0
Engine:	1
Personal:	4
Rescue:	1
Tanker:	0
Other:	0

Responding Agency:

- ☐ LEU ☐ TAAD ☐ CSP
- ☐ EPD ☐ WAS ☐ OPD
- ☐ SSO ☐ WSO ☐ Long FD
- ☐ FPD ☐ FIPD ☐ EPA
- ☐ Flight For Life ☐ FFFPD
- ☐ SCP ☐ PMA ☐ AirLife
- ☐ LAFD ☐ NW/Metro

Station Dispatched:

☑ Station1	☑ 2201	☐ 2251	☐ 2252	☐ 2253	☐ 2254
☐ Station2	☐ 2202	☐ 2222	☐ 2232	☐ 2242	
☐ Station3	☐ 2203	☐ 2233	☐ 2243		
☑ Station4	☐ 2204	☐ 2218	☑ 2224	☐ 2234	☐ 2244
☐ Station5	☐ 2205	☐ 2235	☐ 2245		
☐ Station6	☐ 2206	☑ 2221	☐ 2236	☐ 2238	
☐ Station7	☐ 2207	☐ 2208	☐ 2237	☐ 2247	

Personnel:

Seeber, Phillip
Bennett, Cody
Cohen, Mitchell
Debie, Todd
Plank, Josh

2201/2221/2224 to above address on a car fire. 2221 in service, cancelled in route. 2201 arrival, assisting 2224 with extinguishment. 2201 in service.

Incident Commander: Paul Grenoble, Engineer

Signature: Paul L Grenoble

ER05-505-LC-0082

[redacted]

APPLIED TECHNICAL SERVICES, INCORPORATED ISO 9001

1196 Atlanta Industrial Drive Marietta, GA 30066 (770) 423-1400 Fax (770) 424-6415 e-mail ats@atslab.com www.atslab.com

May 23, 2005

Shawn Norton
Ford Motor Company
300 Parklane Towers West
3 Parklane Boulevard
Dearborn, MI 48126

RECEIVED MAY 23 2005

FORD MOTOR COMPANY
RECEIVED
MAY 24 2005
OFFICE OF THE
GENERAL COUNSEL

Subject: Insured: [redacted]
Claim #: 63-1656-05
Fire loss involving a 1997 Ford F150 truck and residence

Dear Ms. Norton:

ATS has been retained by Auto Owners Insurance Company in Macon, Georgia to inspect a 1997 Ford F150 truck owned by the insured. It was reported that the fire originated within the engine compartment. I inspected the vehicle on May 20, 2005 and my inspection shows that the fire originated at the Speed Control Disconnect Switch.

Evidence of the fire damage has been documented by still photography and a video record of the x-ray inspection of the switch has been performed.

The vehicle is at the insured's residence located at [redacted], Morrow, Georgia [redacted]

Based on findings to date, it is likely that Auto Owners will be looking to Ford for reimbursement of their loss. I have the appropriate documentation of the vehicle and will gladly make it available to any Ford representative. As such, I would like to extend the invitation to Ford Motor Company representatives to inspect the insured vehicle and residence.

I am familiar with Ralph Newell and understand that he or one of his associates would most likely be utilized by Ford, and as such, I would be happy to coordinate directly with them if it would be more convenient. Should you have any questions or need any further information, please do not hesitate to contact me. Thank you for your time.

Sincerely,

APPLIED TECHNICAL SERVICES, INC.,

J. T. Morrill, CVFI
Direct Dial 770-218-2180 ext. 3066
Mobile 770-815-2689

Professional Engineers and Scientists
Design • Consulting • Testing and Inspection
Members in AAFS, ACS, ASM, ASME, ASNT, ASQC, ASTM, AWS, FSCT, IAAI, NACS, NCSL, NFPA, SAFE
GEORGIA SOCIETY OF PROFESSIONAL ENGINEERS, NATIONAL SOCIETY OF PROFESSIONAL ENGINEERS

[redacted]

FORENSICS + DESIGN NELSON ARCHITECTURAL ENGINEERS, INC

RECEIVED
MAY 05 2005

RECEIVED
MAY 05 2005

April 22, 2005

Global Investigations
Ford Motor Company
1 American Road, Suite 127
Dearborn, MI 48126

FORD MOTOR COMPANY
RECEIVED
CLAIMS UNIT
MAY 06 2005
OFFICE OF THE
GENERAL COUNSEL

File: [redacted]

Irving, Texas [redacted]
214-441-9112

NAE File No.: 4445
Claim No.: GCPD US 039784
Date of Loss: 04/19/2005

Dear Sir or Madam:

This letter is to serve as written notice that representatives from Nelson Architectural Engineers, Inc., as requested by USF&G Specialty (vehicle owner's insurance company), have observed the remnants of a 1999 Ford F-150 pickup subject to a fire loss at the above-referenced residence. It is our preliminary opinion that the origin of fire is in and around cruise control solenoid adjacent to the brake fluid reservoir on the driver's side of the engine compartment. Due to the nature of the fire being a possible material defect, our office, in coordination with USF&G, are making the vehicle available for observation and investigation. It is our understanding that the vehicle has not been moved from its original location since the onset of the fire, and will remain there for the next five (5) business days – to be removed after Friday, April 29, 2005. The vehicle will then be moved to an evidence storage facility and stored for an additional 30 days – until Monday, May 30, 2005. After the 30 days, if no response has been received, the vehicle will then be released for disposal. At this time, the storage facility has not yet been determined.

USF&G's representative is Mr. George Aophoff and he can be reached at 866-237-3179. The adjuster for the claim is Mr. Kevin Carr and he can be reached at 214-794-8257. A quick response of your intentions regarding this matter would be greatly appreciated. If you have any questions regarding this letter, please do not hesitate to call.

With kindest regards,

NELSON ARCHITECTURAL ENGINEERS, INC.
Texas Certificate of Registration # F-000950
Florida Certificate of Authorization #00008255

William R. Young

William R. Young, C.F.I.
Consultant

Andrew J. Feenstra, B.S.
Senior Associate – Engineer

NAE: Letter1-4445.doc

Offices in Texas and Florida
2740 Dallas Parkway, Suite 220 Plano, Texas 75093 tel 469-429-9000 fax 469-326-5200 toll free 1-877-850-8765
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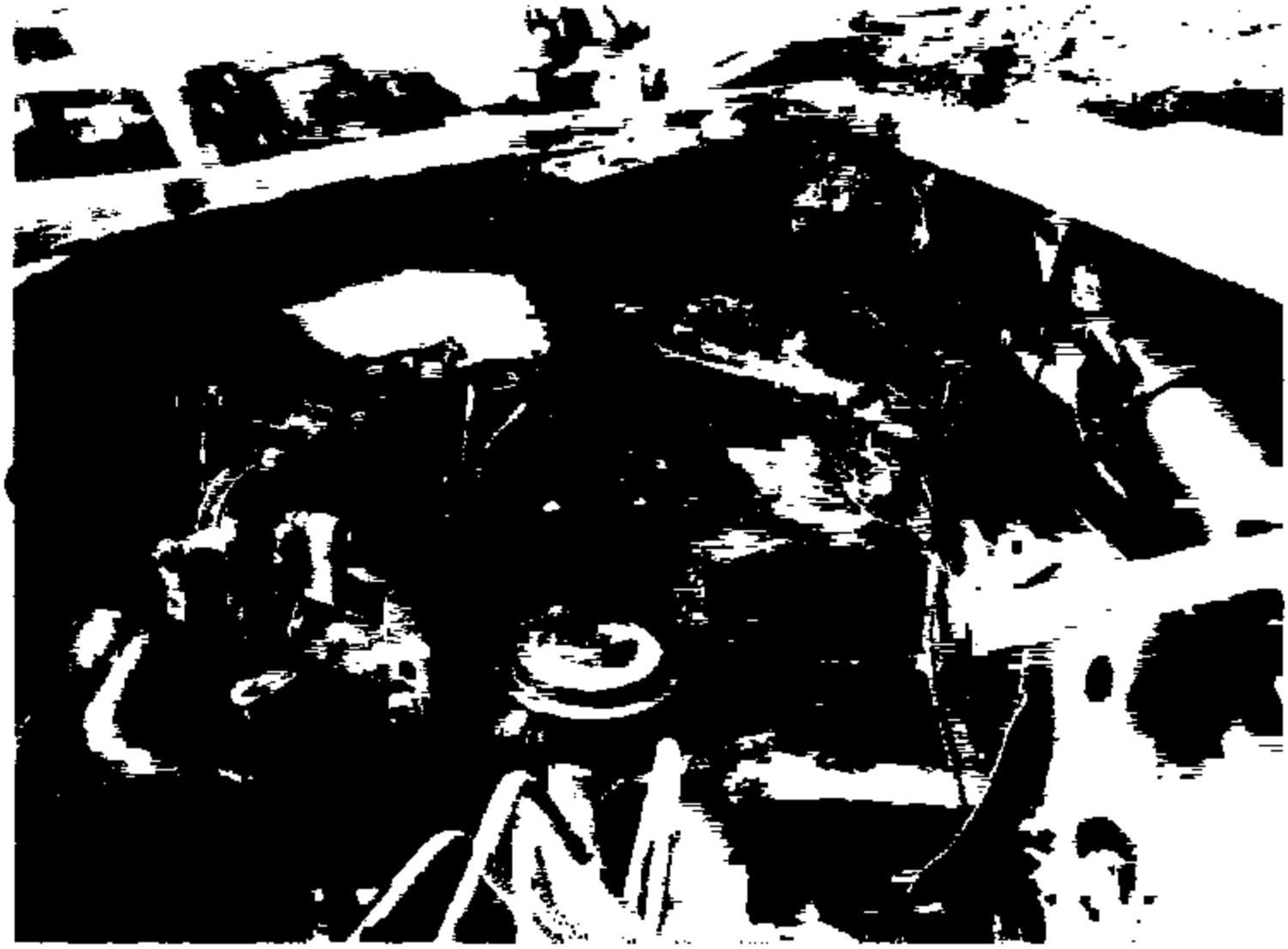
[redacted]

E825-085-LC-0085

ER85-065-LC-9056

EA95-085-LC-9057



Crawford®
Investigation Services, Inc.
Fire & Forensic Unit
(866) 315-0383

PRIVILEGED AND CONFIDENTIAL

REPORT DATE: May 26, 2004

REPORT RECIPIENT:

Nationwide Insurance Company
1001 Hector Street, Suite 300
Conshohocken, PA 19428

ATTENTION: Michael Krause

INSURED: [redacted]

DATE OF LOSS: May 12, 2004

EXAMINATION LOCATION: Copart – Granville, PA

CLAIM NUMBER: [redacted]

CIS FILE NUMBER: 7217-000081

PREPARED BY: John Pflanz, CFEI
Certified Fire & Explosion Investigator

File Status:

X First and Final Report
Initial Report
Interim report
Final report - File closed

ASSIGNMENT:

Received from:	Michael Krause, Nationwide Insurance
Instructions:	Conduct an Origin and Cause examination of a vehicle fire

Received on:	Monday	May 17, 2004	3:50 PM
Commenced on:	Friday	May 21, 2004	9:30 AM
Completed on:	Friday	May 21, 2004	1:45 PM
Verbal report on:	Friday	May 21, 2004	3:45 PM
Verbal report to:	Mike Krause of Nationwide Insurance Company		

RISK:

Make	1999 Ford	Model	Ranger Pick-up
VIN	1FTYR11VXX[redacted]	License Plate	None

ORIGIN AND CAUSE SUMMARY:

The area of origin for this fire is the engine compartment, forward most section.

From the area of origin, the fire spread to the combustible materials (hoses, belts, and wiring insulation) and flammable products (gasoline, oils, and other fluids) common to the engine area before entering the passenger compartment through the windshield/dash area.

The ignition source for this fire is undetermined. Most of the lightweight materials were consumed by the fire due to the fiberglass hood burning away and allowing for unrestricted flame progression.

The first material ignited is undetermined due to the full consumption of most flammable and combustible engine parts.

The event that brought the ignition source and the first material ignited together is undetermined.

BACKGROUND:

There was no background information on the fire event available on this file.

VEHICLE EXAMINATION:

The vehicle examination took place at the COPART facility in Grantville, PA, where the vehicle was stored under Lot [redacted] The vehicle identity was confirmed by the VIN plate on the driver's side doorpost.

EXTERIOR:

The examination of the vehicle started with the front, and the front area of this vehicle sustained intense fire, heat, and smoke damage. The fiberglass hood and front grill assembly were completely consumed by the fire and most of the remains were lost in transportation. The remaining burned sections of fiberglass from the hood were found down on top of the engine block and in other areas inside the engine section. The front bumper (chrome) was heat stained equally from left to right. The light assemblies on both the driver's and passenger's side were consumed by the fire and not in place at the time of the examination. There was some fiberglass remains to the headlight assembly still attached on the passenger's side of the vehicle only.

The front windshield was not completely broken out, with crazing marks throughout and heavy soot coating on both the inside and outside of the remaining glass. The burn through at the firewall into the passenger compartment was greater on the driver's side front most edge than on the passenger's side.

All the paint from the driver's side fender is burned off down to the bare metal. The holes in the frame for the wheel well plastic framing were exposed and the remains of the plastic wheel well covers were consumed by the fire. The driver's side door of the vehicle was burned of its paint back to approximately midway position and the door was found to have been in the closed position at the time of the fire. The remaining paint on the vehicle is a bright red and it is the same color as the flat cap on the back of the bed. The driver's side door mechanism and locking keyhole appear to be in good shape and unaffected by the fire.

The driver's side window had been in a down position by approximately 2 inches at the time of the fire, and the plastic rain guard over the top half of the window had melted down onto the open window frame. This glass on the driver's side door is unbroken and soot covered, with burned plastic remains attached. The bed driver's side fender area was unaffected by the fire and there is some smoke damage noted greater in the forward section than the rear section. The gas fill cap is in place and this area is unaffected by the fire.

The rear of the vehicle is unaffected by the fire, and the chrome bumper and plastic bumper covering as well as the light assemblies are also unaffected by the fire.

The passenger's side rear fender area is in good shape although there is more paint damage by the fire on this side than on the driver's side, mostly in the forward most section closest to the passenger's side door. There is some melting to the wheel well frames on the passenger's side for the rear wheel tire, although there was none on the driver's side. The front passenger's side door has most of the paint burned off back to the door edge. This door also was in the closed position at the time of the fire. The window was broken out but the remains of the glass are still in place up to the upper most edge, indicating the glass was in a closed position before being broken out. The door opening latch and the keyhole mechanism for the passenger's side doors are both affected by the heat and fire, but there are no signs of any tampering. The paint on the passenger's side front fender is completely burned off and is similarly affected as the driver's side was.

The front two tires were completely burned by the fire, with little or no remains. The rear two tires were in good condition and still inflated. All tires appear to have been the matching Goodyear Wrangler RT/S.

INTERIOR:

The interior of the vehicle was examined and found to be heavily smoke and heat damaged. The greatest damage to the interior of the vehicle was on the front most passenger's side where the fire had extended from the engine into the HVAC opening at the glove compartment section. There was also a large amount of burned debris on the passenger's side front floor area. This material appeared to have been in that location prior to the fire. This debris had no affect or involvement with this fire, as it was a non-combustible material.

ENGINE COMPARTMENT:

The examination of the engine compartment showed that the main body of fire originated from this location. Most of the combustible materials (hoses, belts, and wiring insulation) and flammable products (gasoline, oils, and other fluids) common to the engine area were consumed by the fire or lost in transport. As the vehicle was equipped with a fiberglass hood, which was also consumed by the fire, a metal hood covering did not restrict the fire progression.

Based on the most extensive fire damage to the engine parts, the forward most upper section of the engine compartment was determined to be the area of origin of this fire. The entire radiator assembly and mounting brackets were either consumed by the fire or lost in transport. The wiring harness running through the area of origin, over the original radiator location, was extensively damaged by fire. All of the insulation was burned off and some sections of copper wiring were not continuous.

The fire consumed all fuel lines, brake lines, and other liquid flexible lines running through the front and center sections of the engine. The only remaining sections of burned hoses were located at the top rear of center section of the engine area. Upon completion of the examination of the engine compartment, the area of origin was determined; however, the ignition source could not be determined.

VEHICLE UNDERCARRIAGE:

The undercarriage of the vehicle was examined starting at the rear. There was no fire damage to the rear section of the cab aft of the rear wheel axle. There was less of the undercoat paint burned off on the passenger's side than on the driver's side extending back from the rear axle forward. On the driver's side just forward of the fuel tank were the fuel filter and fuel flexible lines running forward and rear. The rear lines were more intact than the forward lines although both had separated. There was only approximately one-half inch of flexible line remaining on the front connector to the filter, while there were six inches remaining on the rear section. The fuel from these lines accounts for the greater damage on the driver's side, although the fire damage is fairly even from the transmission housing forward.

All the combustible and flammable parts from the rear section of the drive shaft forward were completely consumed by the fire with the exception of a few rubber grommets on the protected sections by the framing. The damage noted at the front forward most engine section from the undercarriage shows extensive and complete consumption of all combustibles from the engine block forward. This includes the radiator housing fins and hoses and attachments.

Most of the electrical wiring is not complete and has been burned through in many sections. The sections that are still complete and attached at both ends have no insulation protection for the wiring remaining. The fire consumed all the flexible rubber type hoses, with just the metal connection grommet still in place.

INTERIOR TRUCK BED:

The flat cap was raised and the interior of the truck bed was examined. There was some loose debris that had been placed back in the bed apparently from the site of the fire. There were large sections of the driver's side tire that were still not in place on the vehicle that were found in the bed, as were the remains of the metal vent unit for the passenger's compartment heat/AC. There were also a number of sections of electrical wiring, electrical components, and a coil type thermostatic control. All these items were extensively damaged and had fallen off of the vehicle apparently before initial transportation.

CONCLUSION:

After a thorough inspection of the entire vehicle, including an evaluation of the critical vehicle systems (fuel, electrical, mechanical) and all fluids, I have determined that this fire originated in the engine compartment; however, due to the extensive fire damage consuming most light materials and fluids and the number of missing engine parts, the ignition source is undetermined.

FILE STATUS:

At the present time and with no further investigation immediately anticipated, this file is being closed. Should future circumstances warrant, this file can be easily reopened to allow for additional investigation.

Respectfully,

John Pflanz
Certified Fire & Explosion Investigator
Broomall, Pennsylvania
(610) 359-8516

(Address all correspondence concerning this file to the following address. Please include the CIS file number.)
Crawford Investigation Services, Inc.
National Operations Center
285 W. Esplanade Ave., Suite 200
Kenner, LA 70065

[redacted]

4517 **TRAVELERS**

TRAVELERS PROPERTY CASUALTY INSURANCE COMPANY
SHARON T. REIS
PO BOX 3622
FALL RIVER MA 02722-3622
(888) 725-7695 X 8289
(508) 324-8289

MAY 17 2005

CUSTOMER RELATIONSHIP CENTER

2005 MAY 16 A 9:09

FORD MOTOR CO
CONSUMER AFFAIRS
P.O. BOX 6248
MD-3NE-B
DEARBORN MI 48126

FORD MOTOR COMPANY RECEIVED
MAY 17 2005
OFFICE OF THE GENERAL COUNSEL

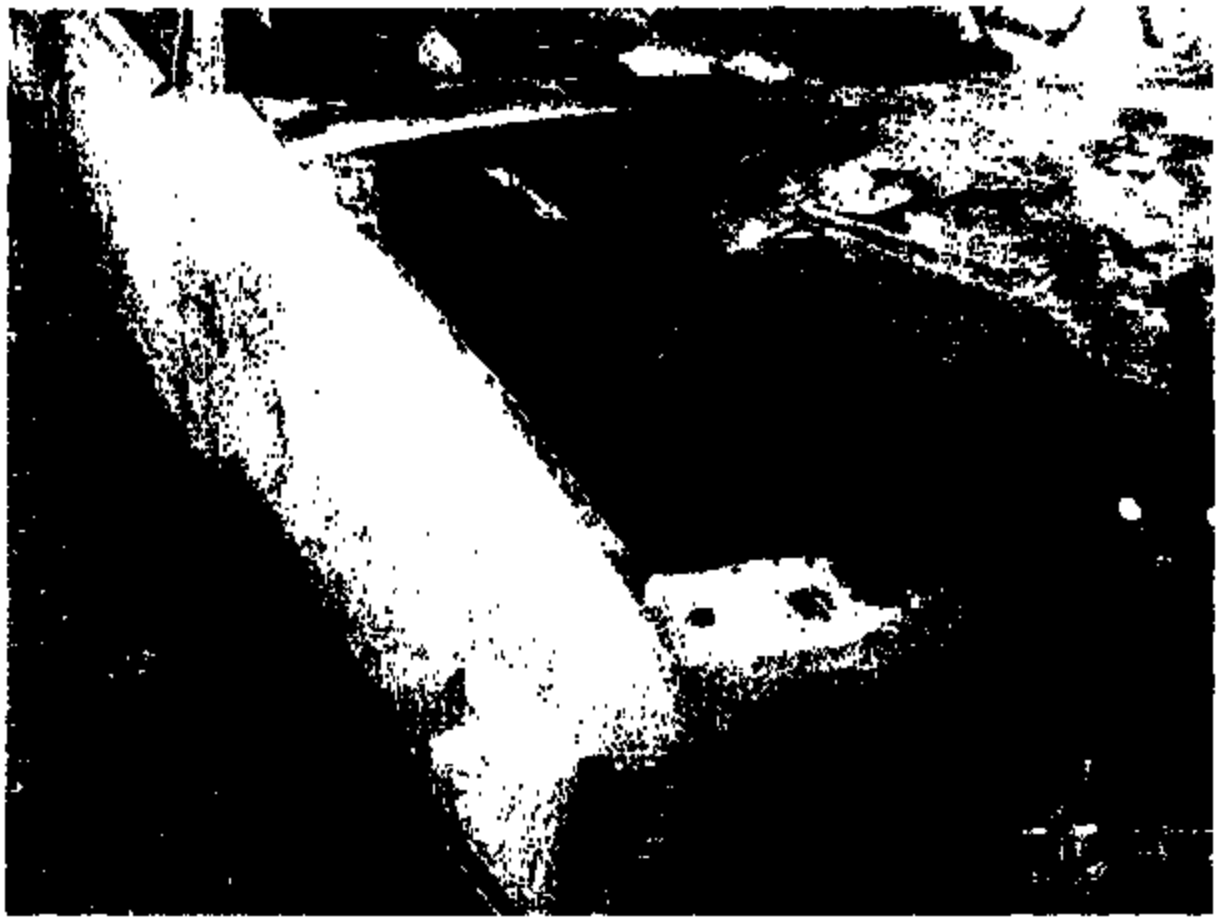
Our Client: [redacted]
Claim/File #: [redacted]
Date of Loss: [redacted]
Your Insured: [redacted]
Your File #: RECALL
Reference: Subrogation Claim

Dear FORD MOTOR:

We are managing a claim on behalf of [redacted] who sustained damages on 04/25/2005.

Based on our investigation, we have determined that your insured may be responsible for this loss. Our adjuster has not yet completed the adjustment. Once this is complete, we will forward our supporting documents for your consideration.

Sincerely,
SHARON T. REIS
Claim Representative
(508) 324-8289
Fax:
Email:



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ER05-825-LC-0075 5/26/2005

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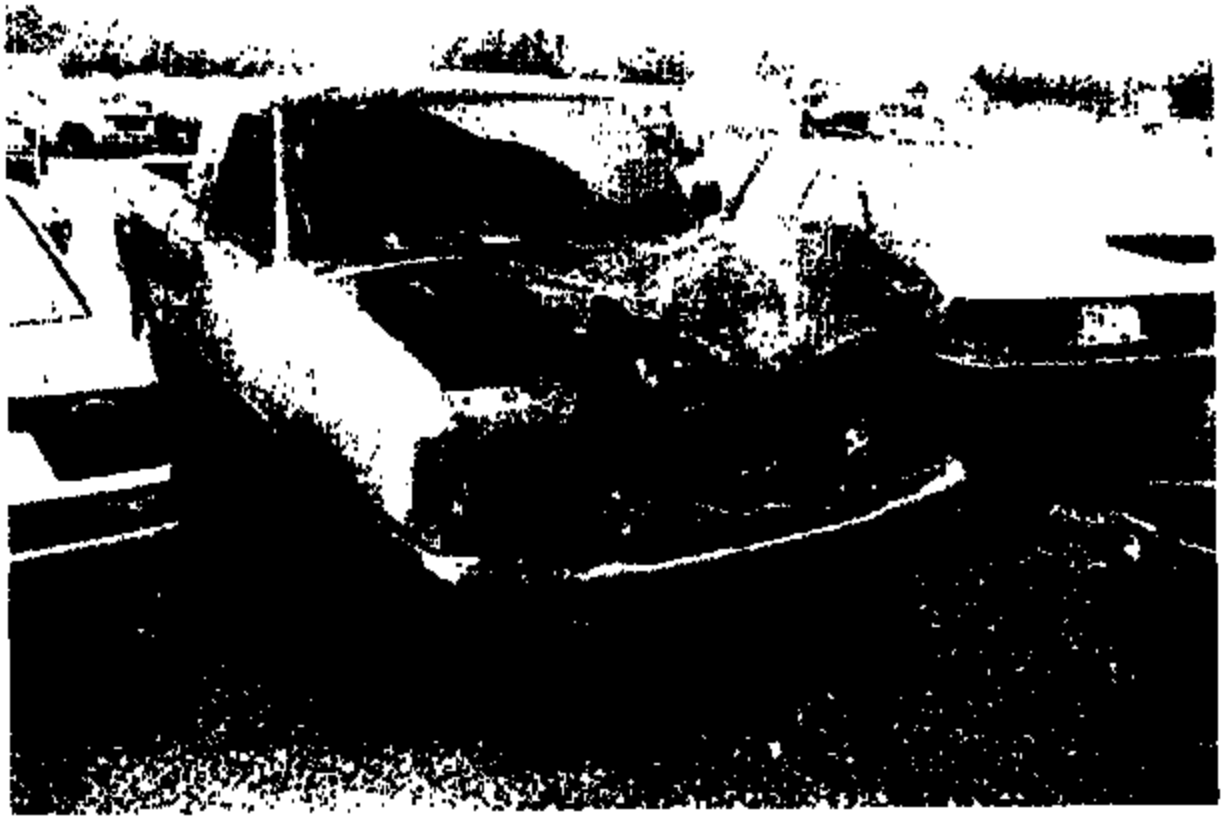

[redacted]

ER05-085-LC-9877 5/26/2005

[redacted]

Wolf TECHNICAL SERVICES INC.

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www.wolftechnical.com

May 11, 2001

Guide One Insurance
7702 Woodland Drive
Suite 100
Indianapolis, IN 46278

Attention: [redacted]

RE: [redacted] (insured)

Client File #: 13A 31088
WOLF Project #: 01-2858-0239

This narrative is accompanied by WOLF six (6) pages of Vehicle Examination Report, twenty-four photographs, a photograph description sheet, NHTSA recall information and ALLDATA service bulletins.

Our examination of this vehicle was performed on April 12, 2001, in Indianapolis, Indiana. The examination revealed that there was no evidence of any components of this vehicle having been removed or altered prior to the fire. All the tires and wheels matched and were serviceable. The exterior and the interior of this vehicle appeared to be maintained in a normal fashion. There was no evidence of body damage prior to fire. The engine and its components also appeared to be intact, except for the fire damage. There was no evidence of any alterations to the engine or any of the components prior to the fire.

We examined the vehicle's exterior and observed a burn pattern on the passenger's side of the vehicle. This burn pattern was in the form of paint damage to the front fender, the engine compartment hood and on the passenger's side of the vehicle. The front tire on the passenger's side also showed evidence of fire damage in that the top of the tire was partially melted.

We examined the interior of the vehicle and observed that there was evidence of fire damage to the interior of the glove compartment. The glove compartment housing was totally destroyed by fire. We looked into the damaged glove compartment and were able to see into the engine compartment through a hole in the fire wall, where the heating & cooling fan unit had been

mounted. Adhered to the inside of the glove compartment door was evidence of melted plastic. On the floor of the passenger's side, we observed a cardboard box. Inside the box, we located and photographed fire damage to the components from the engine compartment. The cardboard box had been placed in the vehicle after the fire to secure any loose items from the vehicle. We do not know who may have gathered the items or furnished the box. The rubber floor mat from the passenger's side was located and photographed. It had suffered fire damage in that the upper one-third had been destroyed. Adhered to the floor mat was a plastic component that appeared to be a part of heating and an condition system.

There is fire damage to the engine in the engine compartment. This fire damage is in the form of melting of the rubber and the plastic components nearest the origin. The metal components show evidence of fire damage in the form of oxidation. The fire damage is much greater on the passenger's side of the engine, near the fire wall immediately behind the glove compartment. We located and photographed a component that was severely damaged from the heat in this immediate area, but was still attached to the electrical wiring. The component was the resistor assembly used to regulate the speed of the blower motor.

We located and photographed the fuse panel and fuses. There are a total of 25 fuses in the panel. They range in sizes of 7.5 amps to 30 amps. Of the 25 fuses, the following 9 fuses were blown.

1. #10-7/5 amps for speed control servo-shift lock actuator –AC- heater assembly, turn signals
2. #13-20 amps for brake pedal position switch
3. #16-30 amps for windshield wiper motor, wiper hi-low relay, park relay
4. #17-25 amps for cigar lighter
5. #18-15 amps for driver's unlock relay, all lock relay
6. #21-15 amps for flashers
7. #22-20 amps for auxiliary power relay
8. #26-10 amps for battery saver relay, elect shift relay, interior light relay, power window relay, dome light, GEM, instrument Cluster
9. #29-15 amps for radio
10. Fuses #16 and #29 were observed to have evidence of heat damage, see photographs #23 and #24

The origin of this loss is the heater case in the engine compartment. The cause is unknown at this time, but there is no doubt that a product placed in the vehicle at the

May 11, 2001

time of manufacturing by the Ford Motor Company malfunctioned and caused ignition of combustibles in proximity. There appears to be a an avenue of subrogation in this loss.

Due to spoilation issues, we have not removed anything. All of the evidence that we examined and photographed, was left in the vehicle. We did not remove or alter anything.

We suggest that an engineer observe the examination of the evidence by a Ford representative. If we can be of any further assistance in this matter or any other matter, please feel free to contact our office.

Respectfully Submitted,

Floyd White

Floyd White,
Fire Investigation Specialist

For the laboratory,

James Casassa, P.E.

FWW / js
Enclosures:

WOLF TECHNICAL SERVICES INC.

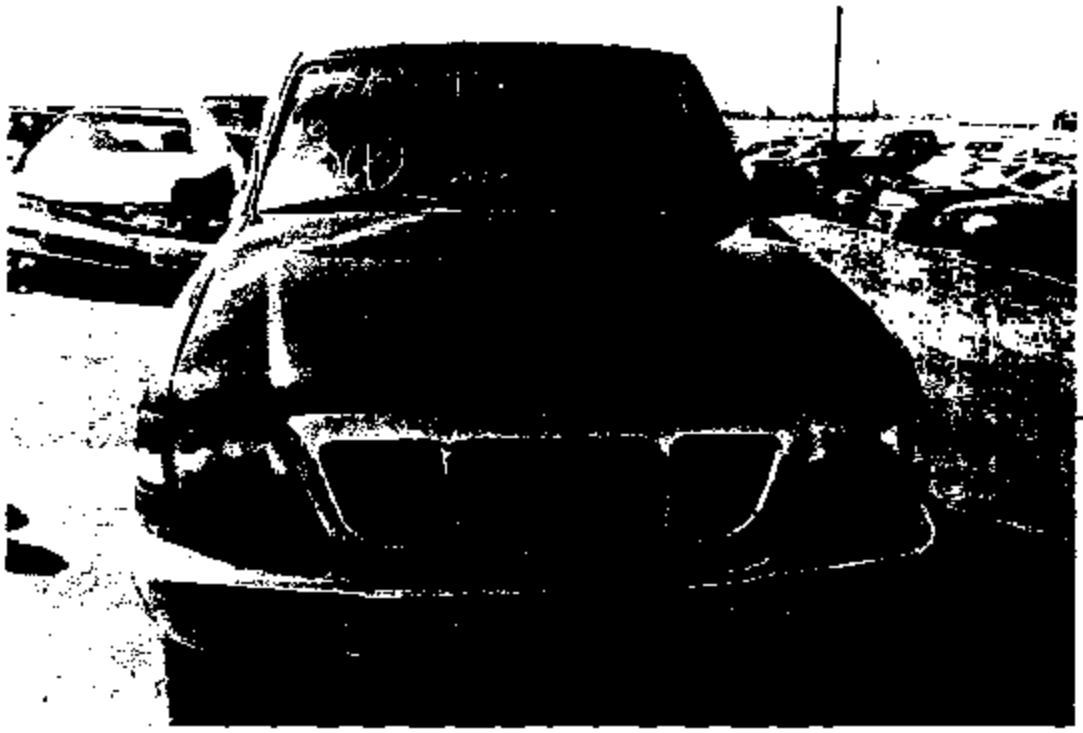
May 11, 2001

PHOTOGRAPHIC INFORMATION SHEET

01-2858-0239

1. Front of vehicle
2. Passenger side of vehicle
3. Rear of vehicle
4. Driver's side rear of vehicle
5. Driver's side front of vehicle
6. Dashboard driver's side
7. Dashboard passenger's side
8. Glove compartment passenger's side
9. Interior of glove compartment
10. Miscellaneous components from area of glove compartment
11. burn pattern on front fender of passenger's side
12. Top of burn pattern
13. Top of engine from front of vehicle
14. Top of engine from passenger's side
15. Engine side of fire wall behind glove compartment
16. Section of damaged fire wall
17. Top of unidentified electrical component from area of glove compartment
18. Bottom of unidentified electrical component from area of glove compartment
19. Front of unidentified electrical component from area of glove compartment
20. Fuse Panel
21. Fuse panel damage to #16
22. Rear of fuse panel and connecting wiring
23. Fuse #16
24. Fuse #29

WOLF TECHNICAL SERVICES, INC.



1
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2
Photo Number

E905-SWS-LC-9082

WTS Project Number 01-2858-0239

WOLF TECHNICAL SERVICES, INC.

3
Photo Number

4
Photo Number

E025-085-LC-0003

WTS Project Number 01-2858-0239

WOLF TECHNICAL SERVICES, INC.

5
Photo Number

6
Photo Number

ERS-OHS-LC-0004

WOLF TECHNICAL SERVICES, INC.

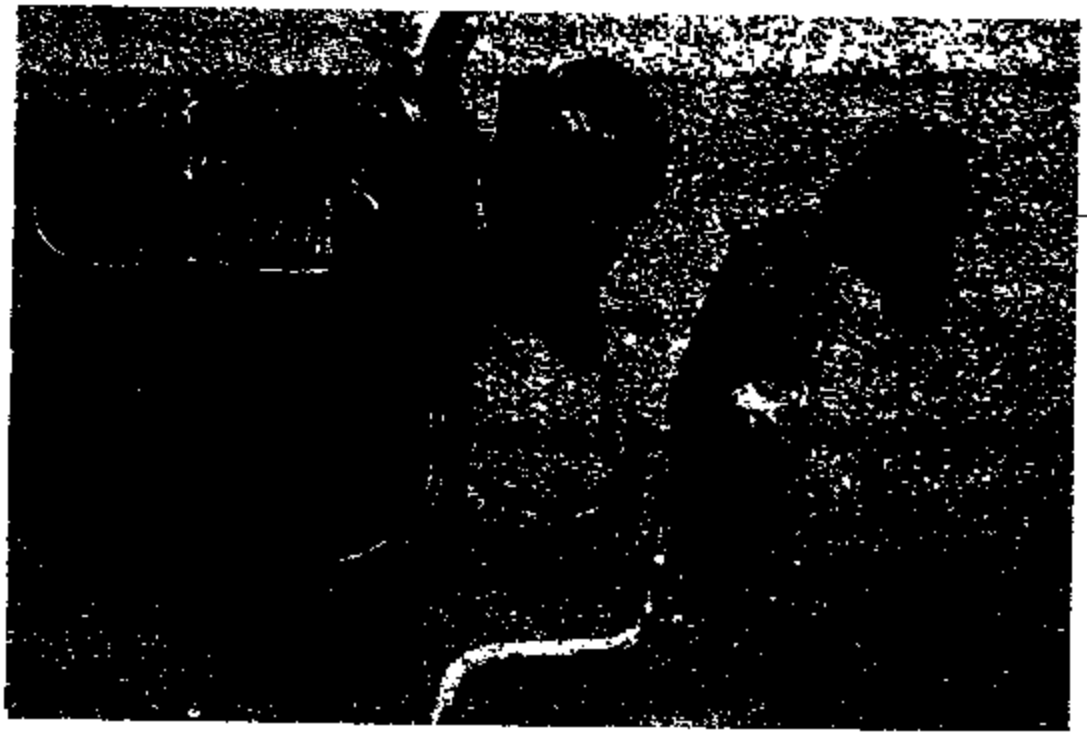
7
Photo Number

8
Photo Number

WTS Project Number 01-2858-0239

WOLF TECHNICAL SERVICES, INC.

9
Photo Number



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WTS Project Number 01-285P-0239

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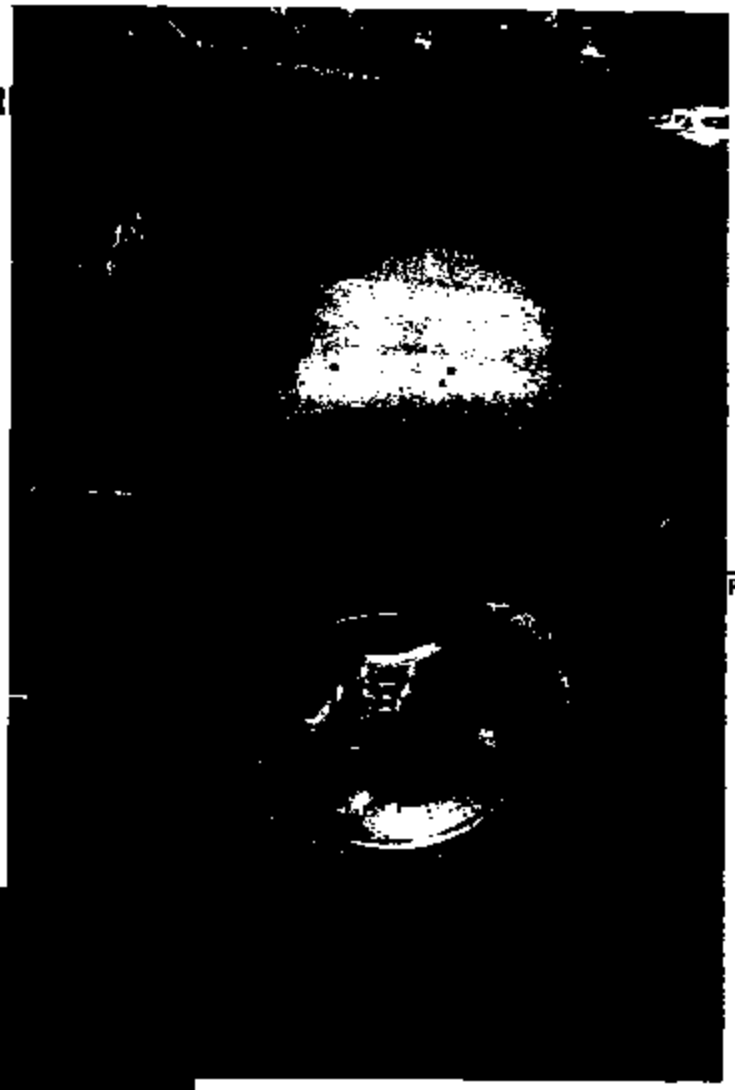

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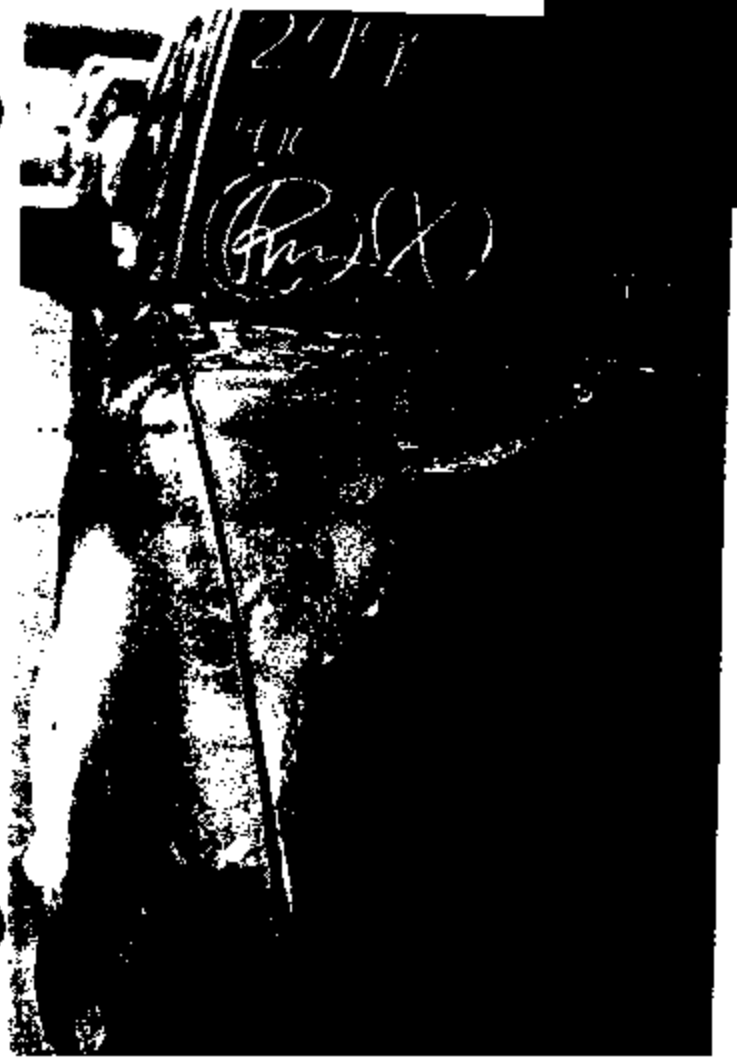

12
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E8C2-B8-LC-9007

Page Number 6 of 12

WTS Project Number 01-2858-0239

WOLF TECHNICAL SERVICES, INC.

13
Photo Number

14
Photo Number

WTS Project Number 01-2858-0239

WOLF TECHNICAL SERVICES, INC.

15
Photo Number

16
Photo Number

WTS Project Number 01-285P-0239

WOLF TECHNICAL SERVICES, INC.

17
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18
Photo Number

WTS Project Number 01-2858-0239

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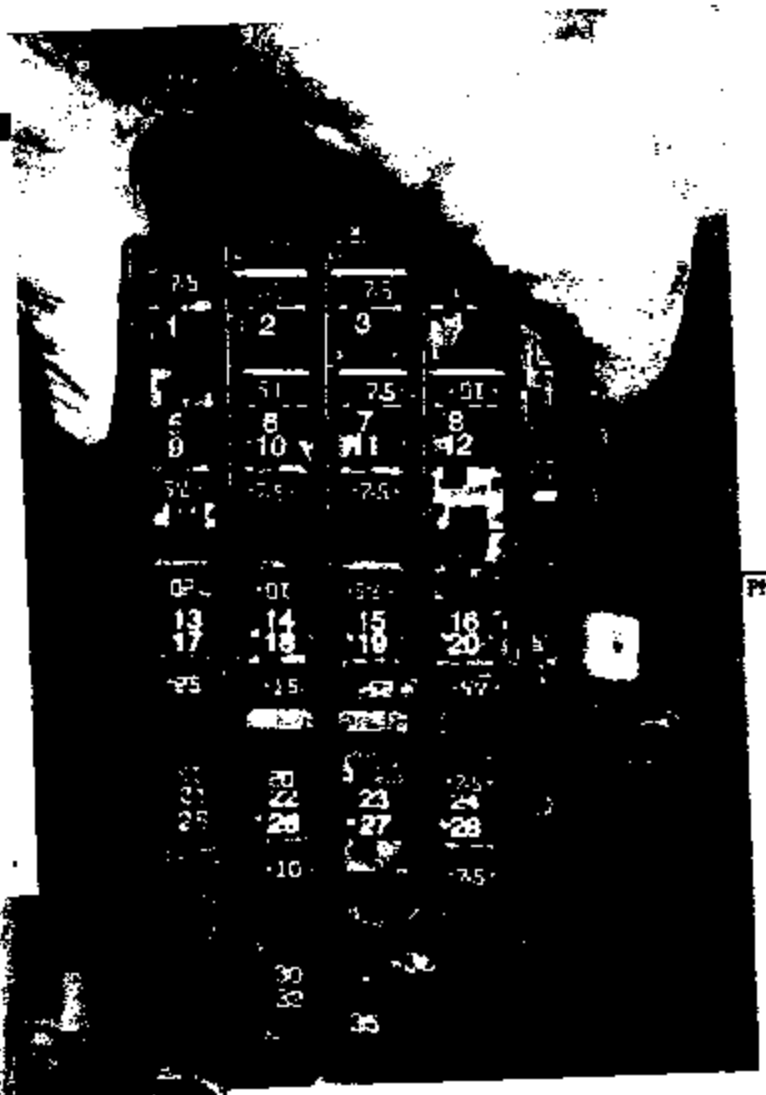
E965-005-LC-0001

WTS Project Number 01-2858-0239

WOLF TECHN



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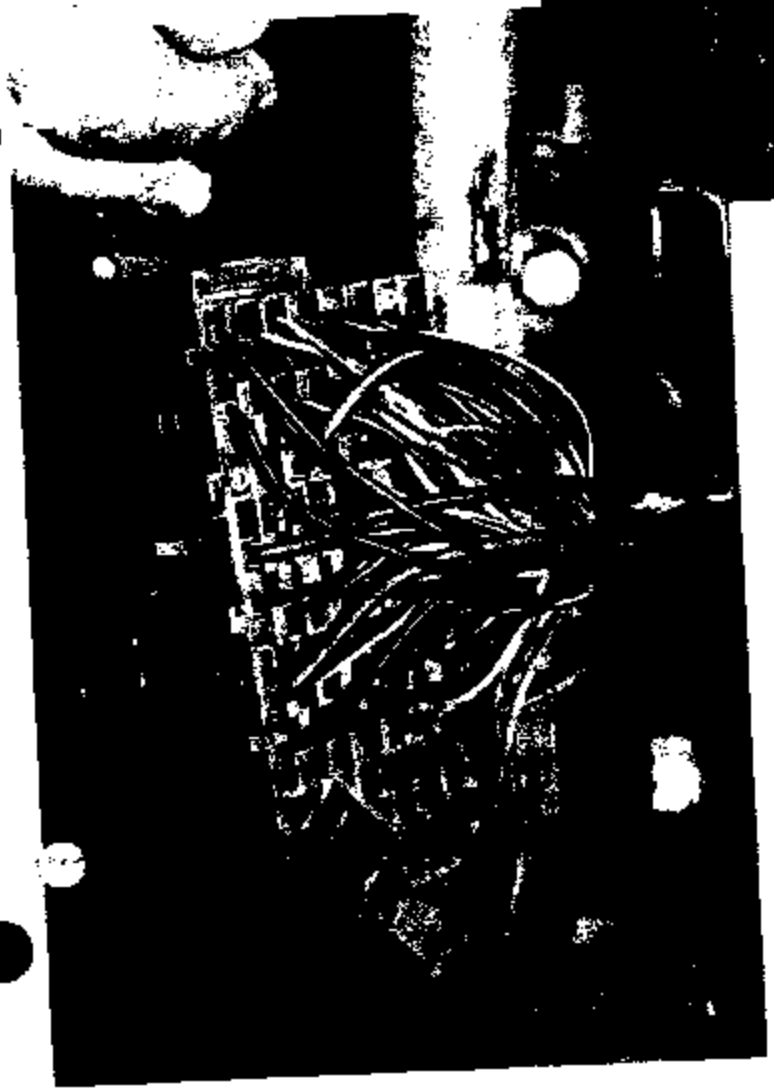

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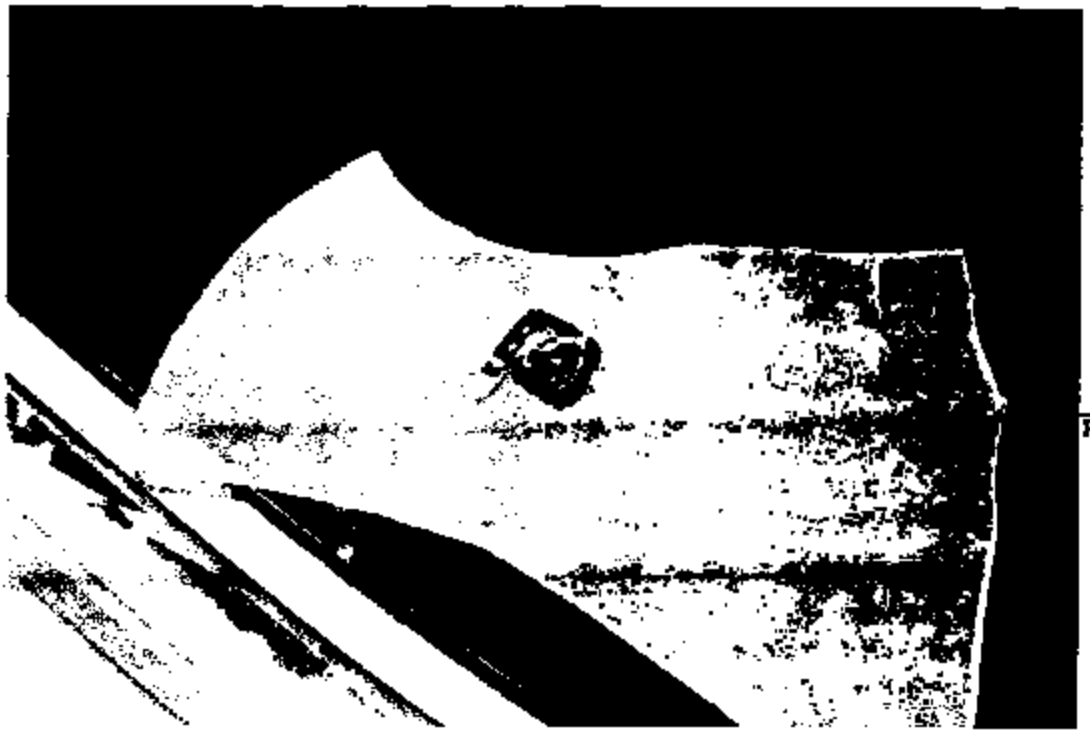
Photo Number

E9905-B05-LC-00082

WTS Project Number 01-2858-0219

WOLF TECHNICAL SERVICES, INC.



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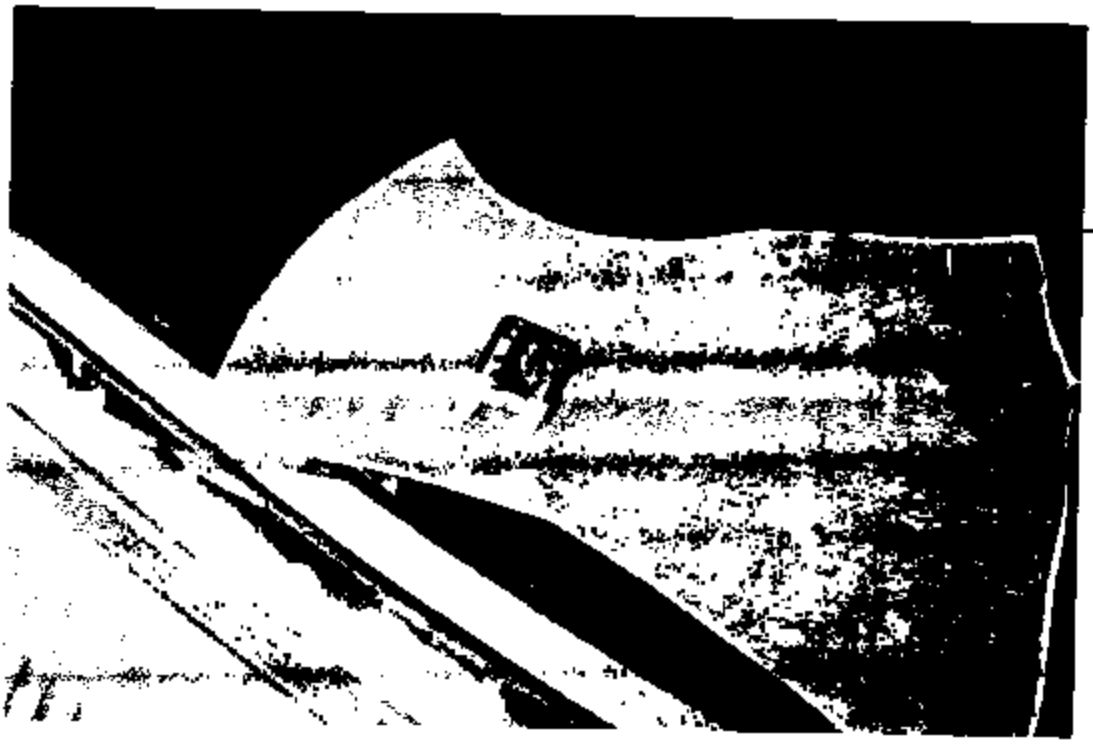

24
Photo Number

WTS Project Number 01-2858-0239

BEDFORD FIRE DEPARTMENT FIRE REPORT

2324
INCIDENT NO

DATE 3-29-01 SHIFT 3 TIME OUT 17:32 ARRIVAL TIME 17:35
OFFICER IN CHARGE AT SCENE [illegible] TIME IN [illegible]
TYPE OF INCIDENT FIRE ✓ EXTRICATION ____ HAZ MAT ____
SERVICE CALL ____ OTHER ____
ADDRESS [redacted] PHONE ____
OWNER OF PROPERTY [redacted]
OCCUPANTS ____
OF INJURIES ____ # OF FATALITIES ____ STATIONS RESPONDING 1 2 3
EQUIPMENT DISPATCHED ENGINES 1 2 3 (4) 7 RESCUE 5 10
VAN 8 ____ CAR 1 15 16
HOSE USED BOOSTER ✓ 1 1/2 ____ 2 1/2 ____ HYDRANT USED ____
INSURANCE CO. [illegible] AGENT ____ DOLLAR LOSS ____
OFFICER MAKING REPORT [illegible]
ADDITIONAL INFORMATION [illegible]

[redacted]

MEACHUM SPAHR COZZI POSTEL & ZENZ
ATTORNEYS AT LAW
10 SOUTH LASALLE STREET
SUITE 2800
CHICAGO, ILLINOIS 60603

TELEPHONE: (312) 726-6317
FAX: (312) 443-9282

LAURENCE MEACHUM
ELLEN L. SPAHR
JOSEPH P. POSTEL
RICHARD E. ZENZ

MICHELLE ANDERS
STEVEN K. BECKER
JOHN F. BOYLE
ADAM J. COX
SINEE DAS
STEPHANIE L. ERICKSON
MARTHA I. GELY
SHARI D. GOODIN-WARD
SUSAN P. GREENCOCK
WILLIAM M. KELLEY
GARY A. MARKS
ELIZABETH MEYER
PATRICK S. NORRIS
COREY P. O'DELL
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SHAZIA AZIM
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DEBORAH L. JENKINS
KRISTY R. JOHNSON
SCOTT J. MALLO
SANDY M. MANN
LATONIA R. ROGERS
CHRISTINE TERRY

May 10, 2005

Ford Motor Company
Risk Management Department
P.O. Box 6248
Dearborn, MI 48126

'95 F-150

Insured: [redacted]
Date of Loss: *May 4, 2005*
Location of Loss: [redacted] *Camby, Indiana*
Claim No: [redacted]

To Whom It May Concern:

We have been retained to represent Indiana Insurance Company with regard to the above-referenced loss. Indiana insures the property at the above reference location. This loss arises out of a fire that occurred at our insured's premises on May 4, 2005. Damages from this loss are approximately $400,000.00.

Our preliminary investigation reveals that Mr. Ragan's F-150 truck was parked in his garage when the engine caught fire due to a faulty switch on the cruise control. The fire quickly began to spread and ultimately damaged the entire truck and house. Luckily, no one was injured. Our insured was the original owner of the truck. Accordingly, please accept this letter as notice of claim against Ford Motor Company. Please forward this letter to your insurance carrier immediately, and have them contact the undersigned. **Although we have conducted a fire scene investigation of the loss site it is still available for inspection. Furthermore, we intend to perform destructive testing on the component parts that caused this fire. Since our insured must mitigate its damages, time is of the essence.** It is, therefore, critical that you or your insurance carrier retain any necessary experts and have them available to participate in future testing/investigation as soon as possible.

We would also appreciate your assistance in identifying any additional parties who may bear responsibility for this loss. If there are any additional parties, including any subcontractors or suppliers whom you believe should be placed on notice, please let us know.

Please preserve any documents, contracts, warranties, product literature, warnings or any other materials relevant to components in the engine and cruise control identified above. Additionally, send copies of any such documents to the undersigned at your convenience.

We look forward to working with you to resolve this potential claim. Should you have any questions or concerns please feel free to contact me or my paralegal, Meka Hamilton-Dukes.

Very Truly Yours,

Gary A. Marek

GAM/mhd

[redacted]

1891 TRAVELERS

THE CHARTER OAK FIRE INSURANCE COMPANY
MARK SLUDER
PO BOX 2954
MILWAUKEE WI 53201-2954
(800) 629-6907 X 4785
(262) 787-4785

MAY 05 2005

April 28, 2005

FORD MOTOR COMPANY
PO BOX 6248

DEERBORN MI 48121

FORD MOTOR COMPANY
RECEIVED
CLAIMS DIV.
MAY 06 2005
OFFICE OF THE
GENERAL COUNSEL

Our Client: [redacted]
Claim/File #: [redacted]
Date of Loss: 04/21/2005
Reference: Subrogation Claim

Dear Consumer Affairs Division:

We are investigating a claim for [redacted] who sustained a loss on 04/21/2005.

Our investigation reveals that you may be responsible for this loss. If you have insurance, please complete the attached form and return it to me. Please refer this letter to your insurance carrier immediately, requesting that they contact our office. Should you not have insurance, please contact me to discuss this loss.

Please call me with any questions.

This loss is involving a 2000 Ford Ranger that caught on fire.

Sincerely,
MARK SLUDER
Claim Representative
(262) 787-4785
Fax: 866-280-7367
Email:

Nothing in this letter is intended or should be construed as an admission or denial of coverage to our insured.

Enclosure: Insurance Questionnaire

EMB-095-LC-0007

Subro Rep. Name: MARK SLUDER

Insured: [redacted]

Date of Loss: 04/21/2005

Our File No.: 266 FR L0Y3595 H

Your Insurance Company's Name: _____

Your Insurance Company's Address: _____

_____ ZIP _____

Phone: (___) _____

Your Insurance Agent's Name: _____

Address: _____

_____ ZIP _____

Phone: (____) _____

Your Policy Number: _____

Your File Number: _____

Your Adjuster's Name: _____

Phone: (____) _____

KENTUCKY BASIC INCIDENT REPORT

Entries contained in this report are intended for the sole use of the State Fire Marshal. Statistics and evaluations made herein represent "most likely" and "most probable" cause and effect. Any representation as to the validity or accuracy of reported conditions outside the State Fire Marshal's office is neither intended or implied.

NFIRS - 1

THIS REPORT IN OWN WORDS _____ FIRE DEPARTMENT

1. ☐ DELETE 2. ☐ CHANGE

FDID	INCIDENT NO.	LAST NO	MO.	DAY	YEAR	DAY OF WEEK	ALARM TIME	ARRIVAL TIME	TIME IN SERVICE
019112	9904195	1	03	04	95	3. Tuesday	2312	2312	0005

TYPE OF SITUATION FOUND: 11. Structure fire; 41. Spill, leak with no ignition; 12. Outside of structure fire; 47. Chemical emergency; 13. Vehicle fire; 73. System malfunction; 14. Trash, brush, grass fire; 15. Refuse fire; OTHER

TYPE OF ACTION TAKEN: 1. Extinguishment; 2. Rescue only; 3. Investigation only; 4. Remove hazard; 5. Standby; 6. Salvage; 7. Ambulance Service; 8. Fill vs. water up. transfer; 9. Type of action taken not classified above; 0. Type of action taken unknown reported

MUTUAL AID: 1. Rec'd; 2. Given; SHIFTING

FIXED PROPERTY USE: HIGHWAY 961

IGNITION FACTOR: SHORT CIRCUIT 54

[redacted] ZIP CODE [redacted] CENSUS TRACT

[redacted] [redacted] ROOM OR APT.

OWNER: FORD MOTOR CREDIT CO.

ADDRESS: P.O. BOX 88304 CHICAGO, IL 60680

TELEPHONE: 800-727-7000

METHOD OF ALARM FROM PUBLIC: 1. Telephone direct; 2. Coded signal municipal; 3. Private fire alarm; 4. Radio; 5. Other signal municipal; 6. No alarm received; 7. Telephone via line to F.D.; 8. Voice signal municipal; 9. Not classified; 0. Undetermined reported

DISTRICT: VOL

SHIFT

NO. ALARMS

NUMBER FIRE SERVICE PERSONNEL RESPONDED: 017

NUMBER ENGINES RESPONDED: 01

NUMBER AERIAL APPARATUS RESPONDED: 010

NUMBER OTHER VEHICLES RESPONDED: 010

NUMBER OF INJURIES: FIRE SERVICE ___ OTHER ___

NUMBER OF FATALITIES: FIRE SERVICE ___ OTHER ___

COMPLEX: HIGHWAY 96

MOBILE PROPERTY TYPE: AUTOMOBILE 11

AREA OF FIRE ORIGIN: OPERATING AREA 85

EQUIPMENT INVOLVED IN IGNITION: NO EQUIPMENT 98

FORM OF HEAT OF IGNITION: UNSPECIFIED SHORT CIRCUIT 124

TYPE OF MATERIAL IGNITED: NOT CLASSIFIED 99

FORM OF MATERIAL IGNITED: ELECTRICAL WIRE 61

METHOD OF EXTINGUISHMENT: 1. Self-extinguished; 2. Water stream only; 3. Portable extinguisher; 4. Automatic; 5. Hand-held water; 6. Sprinkler system; 7. Control not attempted; 8. Undetermined reported; 9. Preconnected hose/water carried in apparatus tanks; 0. Preconnected hose/water from hydrant, draft, standpipe

LEVEL OF FIRE ORIGIN: 1. Below level to 9 ft. above; 2. 10 to 19 ft. above; 3. 20 to 29 ft. above; 4. 30 to 49 ft. above; 5. 50 to 70 ft. above; 6. Over 70 ft.; 7. Cellar or basement; 8. Below groundwater level; 9. Not classified; 0. Undetermined reported

ESTIMATED LOSS (DOLLARS ONLY): 15000

NUMBER OF STORIES: 1. 1/1 story; 2. 2 stories; 3. 3 to 4 stories; 4. 5 to 6 stories; 5. 7 to 12 stories; 6. 13 to 24 stories; 7. 25 to 49 stories; 8. 50 stories or more; 0. Undetermined reported

CONSTRUCTION TYPE: 1. Fire resistive; 2. Heavy stone; 3. Protected noncombustible; 4. Unprotected noncombustible; 5. Protected ordinary; 6. Unprotected ordinary; 7. Protected wood frame; 8. Unprotected wood frame; 9. Not classified; 0. Undetermined

EXTENT OF FLAME DAMAGE: 1. Object of origin; 2. Part of room/area of origin; 3. Room of origin; 4. Fire-resist compartment; 5. Floor of origin; 6. Structure; 7. Beyond structure of origin; 0. Undetermined reported

EXTENT OF SMOKE DAMAGE: 1. Object of origin; 2. Part of room/area of origin; 3. Room of origin; 4. Fire-resist compartment; 5. Floor of origin; 6. Structure; 7. Beyond structure of origin; 8. No damage; 9. Not classified; 0. Undetermined reported

DETECTOR PERFORMANCE: 1. In room or space detected; 2. Not in room or space detected; 3. In room or space operated; 4. Not in room or space operated; 5. In room or space fire area; 6. No detectors present; 9. Not classified; 0. Undetermined reported

SPRINKLER PERFORMANCE: 1. Sprinkler operated; 2. Sprinkler should operated but not; 3. Sprinkler activated but not; 4. No sprinkler present; 5. Not classified; 0. Undetermined reported

IF SMOKE SPREAD BEYOND ROOM OF ORIGIN

TYPE OF MATERIAL GENERATING MOST SMOKE

PATHWAY OF SMOKE TRAVEL: 1. Air handling duct; 2. Corridor; 3. Elevator Shaft; 4. Stairwell; 5. Opening in construction; 6. Utility opening/hole; 7. Utility opening/floor; 8. No evidence of smoke travel; 9. Not classified; 0. Undetermined reported

FORM OF MATERIAL GENERATING MOST SMOKE

COMPLETED BY DISPATCH OR ALL INCIDENTS

COMPLETED BY COMPANY

COMPLETE FOR ALL FIRES

COMPLETE FOR STRUCTURE FIRES ONLY

ERDS-000-1-C-0000

CROFTON VOLUNTEER FIRE DEPARTMENT
P.O. BOX 261
CROFTON KY 42217

RUN SHEET

DATE: 3 / 4 / 95 TIME: ALARM 23:22 10-8 23:24 10-97 23:27 10-98 23:55 10-10 00:05

TYPE OF FIRE: HOUSE( ) BARN ( ) VEHICLE (✓) GRASS ( ) OTHER: ___

LOCATION: 2 1/2 MILES NORTH ON OLD MADISONVILLE Rd.

OWNER: [redacted] ADRESS: [redacted] ROFTON, Ky
PHONE: [redacted]

OCCUPANT: FORD MOTOR CO. PHONE: 1-800-727-7000
ADRESS: P.O. BOX 88306 CHICAGO ILL. 60680-7306

OFFICER IN CHARGE: NELSON A. COKER TITLE: CHIEF
OF FIRE PERSONEL: 7 # OF ENGINES: 1 # OF TANKERS: 0
WAS MUTUAL AID RECIEVED: NO FROM WHAT DEPT.:

DESCRIBE ACTION TAKEN: EXTINGUISHMENT, WITH A A.B.C. EXTINGUISHER

OWNER,S INSURANCE CO: ALLSTATE AGENT: DARRYL CUNNINGHAM
ADRESS: 806 B COUNTRY CLUB LN PHONE: 886-0650 AGENT#

IF VEHICLE OR MOBILE HOME:
YEAR: 1995 MAKE: FORD MODEL: F-150 XL SERIAL:
LICENCE# [redacted] STATE: KY

LIST FIREFIGHTERS RESPONDING:
NELSON A. COKER 1FTEF15N3S[redacted]
HENRY HULBURT
KAY DURHAM
TAD DURHAM
AGNES NOEL
RONNIE E. BROWNING
RONNIE J. BROWNING

REMARKS: SHORT CIRCUIT IN WIRING HARNESS UNDER DASHBOARD. SMALL FIRE IN DASH BOARD AND FLOOR BOARD ON DRIVERS SIDE.

FIREFIGHTER MAKING REPORT: Nelson A. Coker DATE: 3/4/95.

EMS-005-LC-0100

ALLSTATE INSURANCE
715 SECOND ST.
HENDERSON KY 42420

Date: 20-MAR-95 035

ake:FORD TRUCK Model:F150 Year:1995

No recall information on above vehicle(s).

MAR 24 1995

ER95-005-LC-9102

20

INS INVESTIGATIONS BUREAU, INC.
PHOTOGRAPH NEGATIVES

INSURED [redacted]

LOCATION Grapevine Rd. 2 Miles North of Crestan, Ky.

CLAIM NO. [redacted]

POLICY NO. N/A

INS FILE NO. 94501-06463

TAKEN BY PAUL BARNES, CFEI

ENCLOSURE

Form 8002 (5/95)

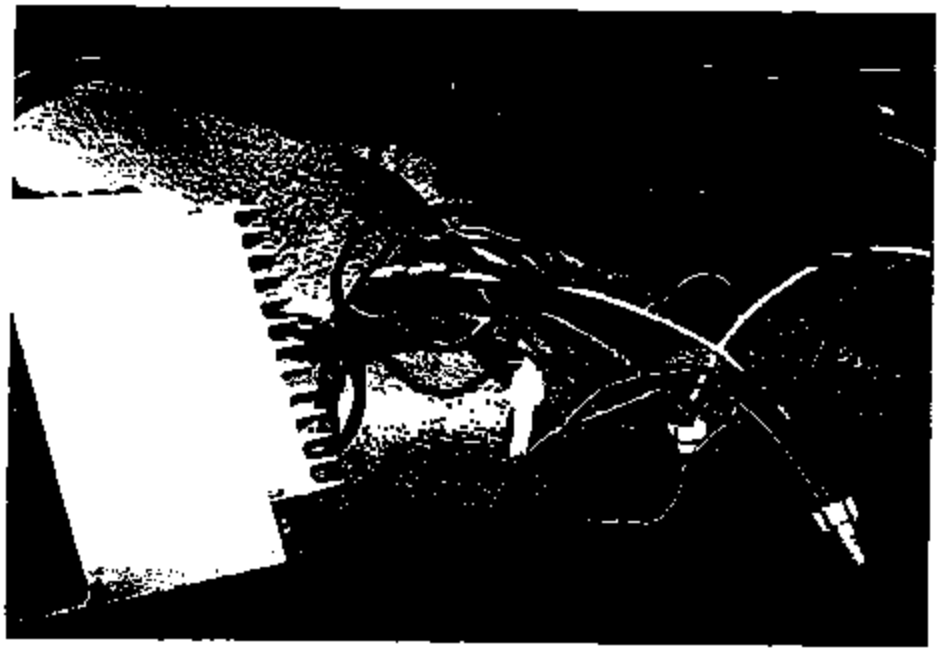
1995

EMS-005-LC-0103

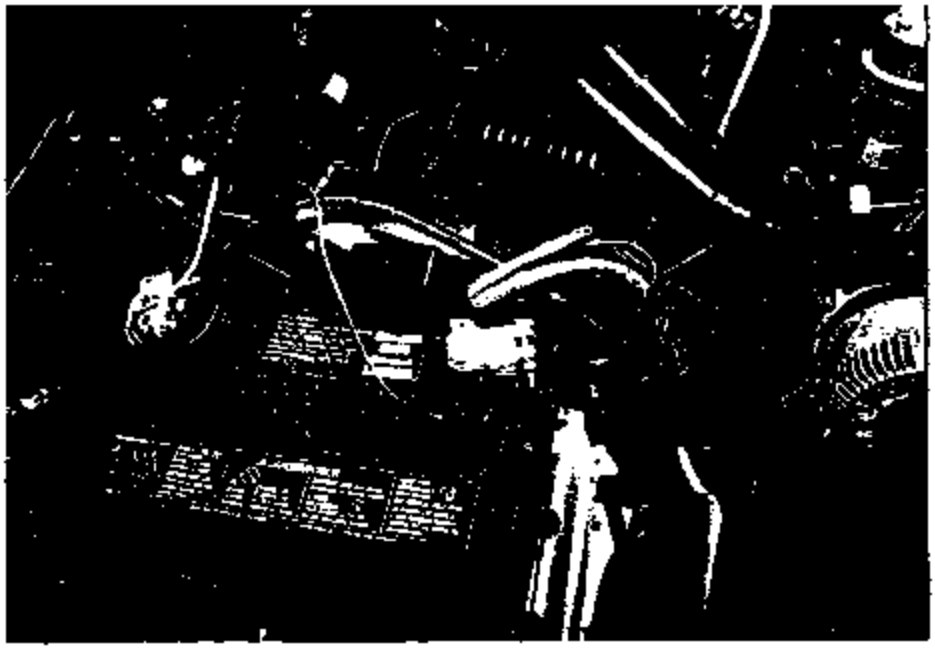
NIS
e 6808 (11/90)

Photo Sheet

INS No. 90E01 06463
Insured [redacted]



No. 11



No. 12

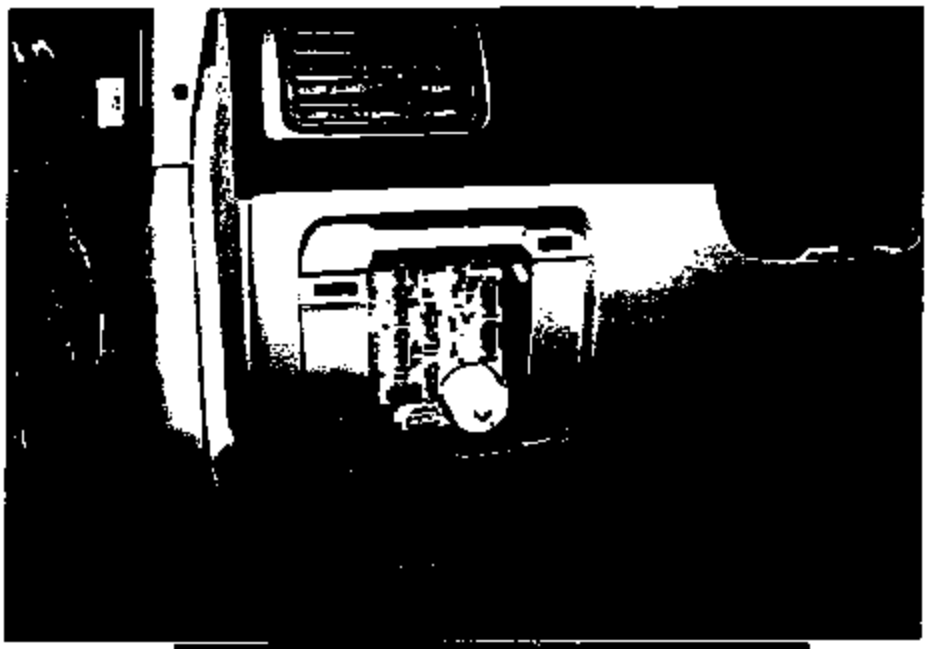
EMD-SBS-LC-9104

APR 7 1995

INS
rev 6009 (11/90)

Photo Sheet

INS No. 94501-06463
Insured [redacted]



No. 9

No. 10

APR 7 1995

E986-085-LC-9105

Photo Sheet

INS No. 94501-06463

Insured [redacted]

No. 7

No. 8

APR 7 1995

EMB-95-C1-0186

Page 4 of 6

16

NISS
1 (9/99) (11/99)

Photo Sheet

INS No. 94501-06463
Insured [redacted]

No. 5

No. 6

APR 7 1995

DMS-003-LC-9187

Page 3 of 6

15

INS
Form 8203 (11/88)

Photo Sheet

INS No. 94501-06463
Insured [redacted]

No. 3

No. 4

ER85-085-LC-9186

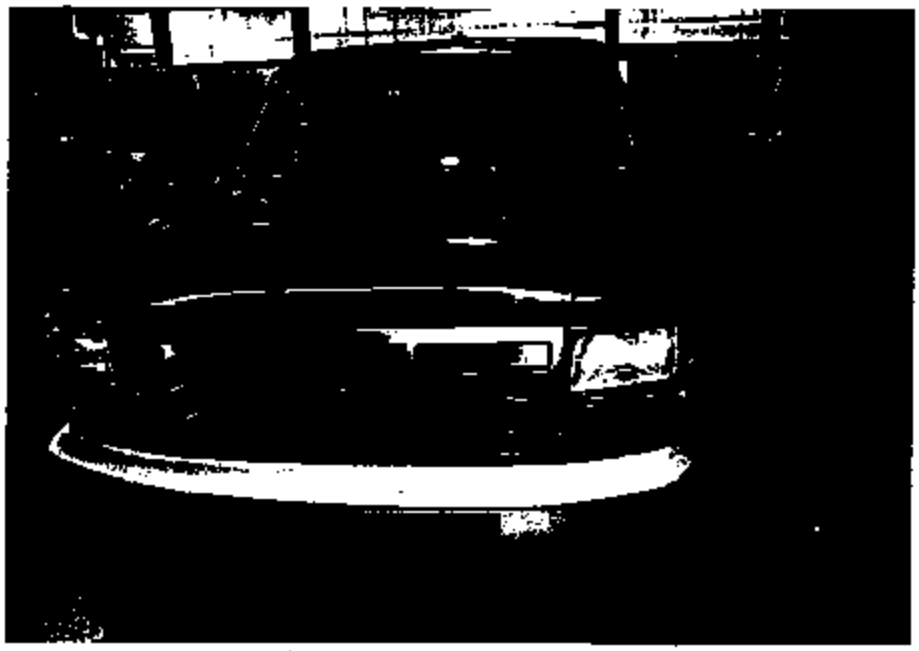
APR 7 1986

NIS
1 (2/93) (11/90)

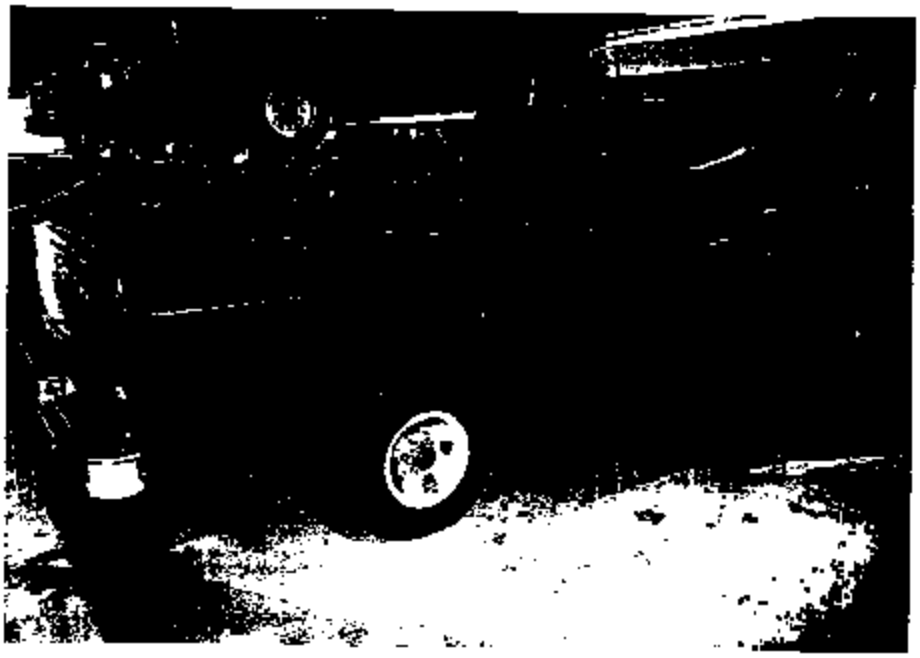
Photo Sheet

INS No. 9450-06463

Insured [redacted]



No. 1



No. 2

MAR 7 1995

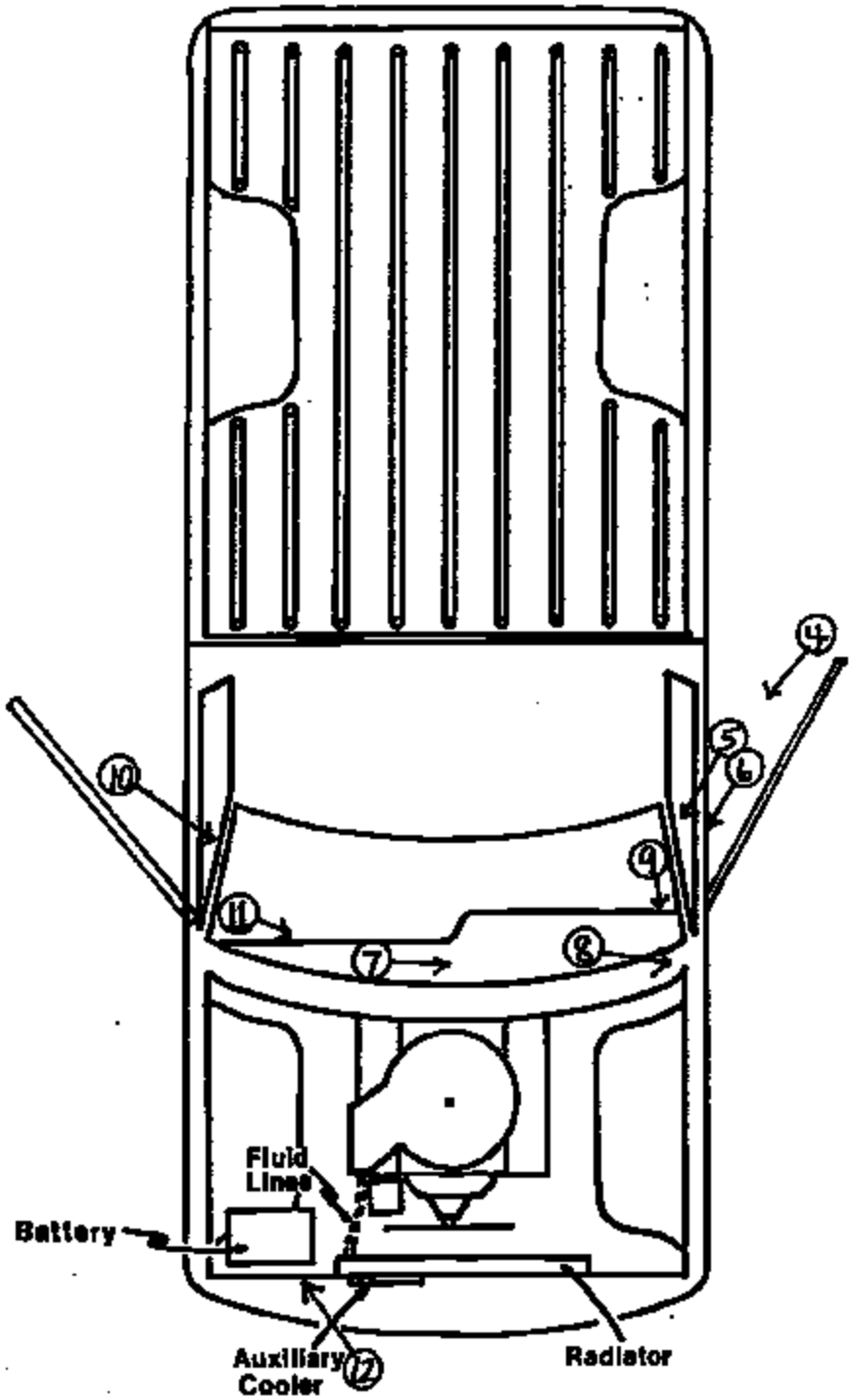
Page 1 of 6

EMPS-MSO-LC-9189

INS
Form 8010 (1/86)

Diagram Sheet

[redacted] (Property Owner) | [redacted] 2 Miles North of Oxford, Ky | Identification No. 94501-06463



EMS-095-LC-9110

APR 7 1995

→ PHOTO. No + direction Taken

Prepared By: PAUL BARNES, CFEI | Date: 3-14-95 | Scale: NOT TO Scale

	Yes	No		Yes	No
gen during fire	☐	☒	Oil below lowest mark on dipstick	☐	☒
r melted	☐	☒	Evidence of excessive oil leakage	☐	☒
radiator hose burned	☐	☒	Holes or cracks in transmission case	☐	☒
radiator hose burned	☐	☒	Transmission case burned/melted	☐	☒
elts burned	☐	☒	Transmission has inadequate lubrication	☐	☒
hoses burned	☐	☒	Any problems with drive-train/suspension	☐	☒
d shroud burned	☐	☒	Motor mounts burned	☐	☒
enders burned	☐	☒			
g system burned	☐	☒			

rks _____

	Missing	Burned	Distorted/ Melted	Shorted/ Arced
y	☐	☐	☐	☐
y connections	☐	☐	☐	☐
y cables	☐	☐	☐	☐
r	☐	☐	☐	☐
tor/generator	☐	☐	☐	☐
on system	☐	☐	☐	☐
panel	☐	☐	☐	☐
g harness	☐	☐	☒	☒

arks _____

	Missing	Burned	Distorted/ Melted
r cap	☐	☐	☐
r assembly	☐	☐	☐
l tank assembly	☐	☐	☐
l lines	☐	☐	☐
l pump(s)	☐	☐	☐
l filter(s)	☐	☐	☐
rburetor/injectors/turbos	☐	☐	☐
intake filters	☐	☐	☐
l vapor recovery system	☐	☐	☐
haust and tail pipes	☐	☐	☐
iffler and catalytic converter	☐	☐	☐

y loose fuel line connections?	☐ Yes	☒ No			
y evidence of tampering?	☐ Yes	☒ No			
el tank	☐ Empty	☒ 1/4	☐ 1/2	☐ 3/4	☐ Full

emarks _____

vidence of any explosion or rupture?	☐ Yes	☒ No
as an oil sample obtained?	☐ Yes	☒ No
aboratory		
as a fuel sample obtained?	☐ Yes	☐ No
aboratory		
ere debris samples obtained?	☐ Yes	☐ No
aboratory		

Remarks _____

Special Agent PAUL BARNES, CEET Date 3-14-95

APR 7 1995

ERB-005-LC-0111

INS

VEHICLE FIRE EXAMINATION REPORT

Insured [redacted] | INS File Number 94501-06463

Manufacturer Ford | Year 1995 | Model F-150 XL | Body Style PU

State Inspection State NA | Date NA | Odometer 003003

Displayed on Vehicle Tag Number 307DAE | Year 1995 | State Ky. | VIN No. (Last four [redacted]

Vehicle Examination Date 3-17-95 | Location Little River Ford, Hopkinsville, Ky.

Fire Damaged Areas ☐ Exterior ☒ Interior ☐ Engine Compartment

EXTERIOR

	Burned	Distorted/ Melted	Accelerant Patterns	Collision Damage
Bumper and Grill	☐	☐	☐	☐
Hood	☐	☐	☐	☐
Left Front	☐	☐	☐	☐
Right Front	☐	☐	☐	☐
Roof	☐	☐	☐	☐
Left Door(s)	☐	☐	☐	☐
Right Door(s)	☐	☐	☐	☐
Trunk	☐	☐	☐	☐
Left Rear	☐	☐	☐	☐
Right Rear	☐	☐	☐	☐
Rear Bumper Area	☐	☐	☐	☐
Underside	☐	☐	☐	☐

TIRES	Burned	CONDITION PRIOR TO FIRE: Serviceable	Unserviceable	Uneven Tread Wear
Left Front	☐	☐	☐	☐
Right Front	☐	☐	☐	☐
Left Rear	☐	☐	☐	☐
Right Rear	☐	☐	☐	☐
Spare	☐	☐	☐	☐

Tires indicate signs of recent removal/exchange? ☐ Yes ☐ No

Wheels/wheel covers indicate recent removal/exchange? ☐ Yes ☐ No

Indicate areas of forced entry ☐ Door(s) ☐ Hood ☐ Trunk ☐ Glass

GLASS	Smoked	Cracked	Distorted/ Melted	Broken
Windshield	☒	☐	☐	☐
Left Door(s)	☐	☐	☐	☐
Right Door(s)	☐	☐	☐	☐
Rear	☐	☐	☐	☐
Sunroof	☐	☐	☐	☐

Remarks

INTERIOR

	Yes	No
Door(s) open during fire	☐	☒
Window(s) open during fire	☐	☒
Was key in the ignition	☒	☐
Have any accessories been removed	☐	☒
Any unusual burn patterns	☐	☒
Any abnormal melting	☐	☒
Any unusual objects in vehicle	☐	☒
Was trunk open during fire	☐	☐ NK
Any unusual objects in trunk	☐	☐ NA

Remarks Only Damage was to 14401 Wiring Harness on left interior of Vehicle.

APR 7 1995

Page 1 of 3

(10)

EMB-095-LC-0112

he wanted to talk with the Chief. [redacted] looked at him and said, "I'll see you later" and then left. This was 15 to 20 minutes prior to seeing your Insured running toward Crofton on Grapevine Road.

DETERMINATION OF ORIGIN & CAUSE

Due to the amount of destruction to the wiring harness beneath the dash in the cab of this vehicle, it is my opinion that this fire was the result of a manufacturing defect within the wiring harness of this vehicle.

COMMENTS

Mike Utzig, Service Manager at Little River Ford, and Scott Plog stated a Ford representative would be removing the dash so they could get a better observation of all of the wiring in that area. When they are ready to do this examination, they are to notify me so I can be present.

In accordance with your instructions, this file is being placed in closed status but may be reopened at any time upon request.

Paul H. Barnes
Senior Investigator
Telephone/FAX: 502-885-0733

PHB*js

INVESTIGATION

While driving south on Grapevine Road, approximately two miles north of Crofton, Kentucky, your insured smelled smoke and then felt heat around his feet. Shortly thereafter, the lights began to intermittently go on and off. He pulled the vehicle off to the side of the road, saw a red glow on the floorboard, and both his legs and feet were getting warm. Before exiting the vehicle and closing the door, he made sure the windows were in the up position. [redacted] said he started running south toward Crofton and saw Police Chief Otis Henderson's cruiser approaching him. He flagged down the Chief and told him his truck was on fire.

Your insured said he had experienced no problems with the vehicle, other than it pulling somewhat to the left. He was scheduled to take it to Little River Ford, from where he had it leased, to have that deficiency repaired.

My information was that [redacted] had used a cellular telephone to call the fire department. When asked about this, he said he had not had a cellular telephone for several months. I also asked him why he did not use his radio to call the fire department. He explained that when his lights began to flicker and the horn started blowing, he knew it was electrical in nature and did not think his radio would work as it was connected to the electrical system. Also, he said that by the time he got the vehicle stopped and observed the fire beneath the dash, the smoke and heat were too intense to remain in the vehicle and attempt to use the radio.

I talked with Kay Durham and Jim Browning, who are EMT's and firefighters with the Crofton Volunteer Fire Department. Ms. Durham told me she thought [redacted] had reported the fire on a cellular telephone. She and Mr. Browning stated that when they arrived at the scene, the fire was out and they found that it had been contained to the wiring harness beneath the dash. The vehicle's horn was intermittently blowing and the lights were occasionally flashing. Mr. Browning said that although the fire was nearly out when they arrived, a chemical fire extinguisher was used to ensure extinguishment of any remaining fire.

During a conversation with Police Chief Otis Henderson, he confirmed that he was flagged down by your insured approximately one mile north of Crofton. He said he asked [redacted] what he was doing out there and [redacted] told him his truck had caught fire. Chief Henderson called the fire department via his radio as he and your insured were returning to the truck. When they arrived, smoke was coming from the cab of the vehicle but no flames were visible. They left the doors in the closed position and awaited the arrival of the fire department.

When Chief Henderson approached the driver's side of the vehicle with his flashlight, he saw a disposable butane cigarette lighter lying in the road by the truck and he asked your insured where it came from. Your insured told him that it must have fallen out of his pocket or from the truck when he exited the vehicle. During my examination, I observed a disposable lighter and several packs of cigarettes lying in the driver's seat.

According to Chief Henderson, he had been conducting an interview in his patrol car earlier in the evening. Your insured pulled up beside his vehicle and sat there as if

(8)

IGNMENT

assignment was received March 13, 1995 and the investigation commenced ch 14. My instructions were to conduct an origin and cause examination.

LOSURES

Vehicle fire examination report;
1 diagram;
12 photographs and all negatives.

HICLE EXAMINATION

amined this vehicle at Little River Ford in Hopkinsville, Kentucky. Present during ortion of that examination were the Service Manager for Little River Ford, Mike lg, and their technician, Scott Plog. There were no adverse conditions affecting examination and although the vehicle had been towed to Little River Ford from location where the fire occurred, it did not appear to have been altered since the .

e exterior of this vehicle displayed no evidence of this fire, with the exception of light soot build up at the bottom of the interior of the windshield. There was no ced entry to the truck as your insured left it unlocked for fire department rsonnel. The windows were in the up position and both doors were closed during e course of the fire.

is fire was contained to a small portion beneath the dash in the passenger mpartment and originated in the 14401 wiring harness beneath the dash at the far t of the cab. Some heated and molten plastic materials fell to the floorboard and used some damage to the rubber floor matting in proximity to the fire wall on the iver's side of the cab.

n examination of the wiring harness beneath the dash caused extensive damage to e wiring, especially on the driver's side of the passenger compartment. The hood lease appeared to have been fused to the wiring harness and when the technician ttempted to use this release to examine the engine compartment, the hood release roke away from its mounting.

uring my examination of the wiring in the engine compartment, I discovered no vidence of shorting or arcing. The fuse panel contained two blown fuses, both of hich were to the instrumentation and lighting within the cab of the truck.

examined the positive and negative wires your insured ran to the negative and ositive posts of the battery and then through the fire wall to supply power to two adios. In examination of the wiring from the battery, as well as the external wiring o the radios, both of which were fused and the fuses intact, I found that none of his wiring suffered any damage.

No physical evidence was removed from this vehicle by me. The enclosed photographs remain as documentation of my findings.

APR 1995

INS INVESTIGATIONS BUREAU, INC.
2345 South Lynhurst Drive, Suite 220
Indianapolis, Indiana 46241
800-326-6034
317-243-3257
FAX: 317-243-8639

PRIVILEGED AND CONFIDENTIAL

REPORT NUMBER ONE & FINAL

April 4, 1995

PREPARED FOR: Allstate Insurance Company
715 Second Street
Henderson, Kentucky 42420

ATTENTION: Ms. Sandy Hanes

INSURED: [redacted]

DATE OF LOSS: 03/04/95

LOSS LOCATION: Crofton, KY

POLICY NUMBER: Not available

CLAIM NUMBER: 2201526940

INS FILE NUMBER: 94501-06463

Allstate

Field Claim Office
715 Second Street
Henderson, KY 42420
502-826-1994

4/7/95

Ford Motor Credit Corp.
618 N. Green St.
Henderson, Ky. 42420

Dear Chris,

Attached you will find the cause and origin report on [redacted] 1995 Ford F150 XL pickup, per our discussion. This report advises that the fire started as a result of a manufacturing defect within the wiring harness.

Mr. Pyle has comprehensive coverage which will pay for the fire damage, however we would then subrogate Ford Motor Co.

Please speak with your supervisor and consider handling this loss directly with Little River Ford in Hopkinsville, to resolve since the pickup has been repossessed.

Please contact me in my office at the above number.

Sincerely,

Sandy Hines
Sr. Staff Claim Rep.

EA85-005-LC-0117

[redacted]

GEICO

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

One GEICO Blvd. ■ Fredericksburg, VA 22412-0001

July 9, 1996

FORD MOTOR COMPANY
OFFICE OF GENERAL COUNSEL
PARKLANE TOWERS WEST STE 300
300 PARKLANE BLVD
DEARBORN MI 48126

Claim Number [redacted]
Insured [redacted]
Date of Loss: 6-21-96

To Whom It May Concern:

Please be advised we are in the process of handling the above referenced fire loss of a 1997 Ford F150. Our intent is to file subrogation in this matter as our investigation indicates your company may be considered liable for this loss.

If you would like to inspect the damaged vehicle, please contact the below named adjuster for information regarding the location of the vehicle. The vehicle and all parts will be retained to provide you an opportunity to complete your investigation of this matter.

Please be advised our insured has incurred personal losses in this matter and may be contacting you regarding the separate handling of his claim.

If you have any questions or concerns, please call me at 1-800-841-1003 ext. 4638, Monday - Friday from 8:00 a.m. to 4:00 p.m. EST and I will be happy to discuss them.

Thank you for your time and attention in this matter.

Sincerely,

Jo G. Bayliss
Theft Examiner I

JGB/dp

cc: Culpeper Ford c/o Neil Merchant
PO Box 1836
Culpeper VA 22701

ER85-085-LC-9118

GEICO

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

One GEICO Blvd. ■ Fredericksburg, VA 22412-0001

August 21, 1996

FORD MOTOR COMPANY
PARKLANE TOWERS WEST SUITE 400
THREE PARKLANE BOULEVARD
DEARBORN, MI 48126-2568

Claim#: [redacted]
Our Insured [redacted]

Date of Loss: 06/21/96
Vehicle: 1997 Ford F150

To Whom It May Concern:

In response to your acknowledgment letter dated July 19, 1996, GEICO is able to provide the following information related to the mechanical fire:

1. On June 21, 1996, [redacted] was operatin his vehicle on Rt. 629 near Rt. 729 when he noticed smoke coming from the engine compartment of the vehicle. [redacted] proceeded to stop the vehicle, and call the fire department. By the time the authorities responded to the scene, the vehicle had been totally consumed byfire. No fire report was written.

2. The vehicle was a 1997 Ford F150 serial # 1FtdF1725V[redacted]

3. At the time of the loss, the vehicle had been driven approximately 3,768 miles.

4. William H. Seals investigated the loss and concluded that the fire was caused by a defective alternator.

5. The vehicle is located at Cosner Salvage located on Rt. 250 in Troy, VA. Their Phone number is (800) 248-6161 and is available for your inspection.

If you have any questions, feel free to contact any of the following:

Matt Wiseman:	Auto Damage Adjuster	(804) 981-0650
William H. Seals:	Certified Fire Inspector	(703) 754-4721
James Carey:	Payment Recovery Examiner	(800) 841-1003 extension 4378

Sincerely,

James Carey
Payment Recovery Examiner

JC/wdd

ER05-005-LC-3119

[redacted]

IL 5231251
10-7-10/5 11

WOLF TECHNICAL SERVICES, INC.
Technical Investigations
Forensic Analysis
Engineering Consultants
6828 Hawthorn Park Drive • Indianapolis, IN 46220-3909 • (317) 842-6075 • FAX (317) 842-0974

July 13, 1995

USAA Auto Insurance
P.O. Box 33490
San Antonio, TX 78265

Attn: Sue Guerriero

Re: Your file # 5231251
WTS Project #: 95-805-422

BACKGROUND OF THE INCIDENT

This investigation involved a fire in a 1995 Ford Club Van reported to have occurred on Friday, May 25, 1995 in Gosport, Indiana. The reported owner was Judith Purdie, of Elletsville, Indiana. The vehicle was subsequently removed to the Indiana Auto Storage Pool in Indianapolis where this examination was performed.

Wolf Technical Services, Inc. (WTS) was contacted on Friday, June 9, 1995 with instructions to conduct an origin and cause investigation into the loss. This investigation was initiated by John Wood, Fire Investigation Specialist, with assistance from Ronald Taylor, Fire Investigation Specialist with Wolf Technical Services, Inc. (WTS)

CONCLUSION

It is our technical opinion based upon the examination of physical evidence combined with witness information that the fire originated in the engine compartment, at the left rear of the engine. The area was at or near the fuel regulator supplying fuel to the engine.

The exact cause of the fire could not be determined, however, a failure in one of the fuel lines to or from the fuel regulator cannot be eliminated as the cause.

DISCUSSION

The driver of the vehicle advised that he had been driving the vehicle and had stopped at a dump station. After parking the vehicle and walking away, he heard a noise from the van. Looking toward the van, he observed fire coming from the under side of the van. The nearest telephone was over a mile from the scene, and it was necessary to travel this distance by foot to report the incident to the fire department. The location was somewhat remote and additional time was involved before the fire department arrived to extinguish the fire.

The vehicle was a green 1995 Ford Club Van E-350 equipped with a 5.8 Liter engine. The vehicle was located at the Indiana Auto Storage Pool under hold # 78471. This vehicle was also found to have an auxiliary hydraulic wheel chair lift installed onto the frame. On viewing, the vehicle displayed effect of heat and flame impingement over the entire exterior body. This situation was also observed in the interior of the passenger compartment and the engine compartment.

No collision damage normally associated with a traffic accident was observed. The left front tire appeared to have been nearly destroyed by the fire, with the remaining tires found in place in a deflated condition. All wheels were found with the lug nuts in place and the wheel covers with exception of the left front in place.

The door to the fuel filler cap and tube was found in a closed position with the cap melted and the filler tube in a melted condition. The gasoline tank was found intact with no evidence of a leak from the tank.

The hood was found to have been constructed of a fiberglass material and was consumed during the fire. The front grille and other combustible material associated with that area had been destroyed. The radiator was melted from the top downward. The upper portion of the components within the engine compartment below the hood, displayed damage indicating the path of the fire to have been from the rear moving toward the front. The lower front areas of the engine compartment were found generally intact.

Inspection of the passenger compartment showed all combustible material have been consumed. The frame work of the seats in the vehicle were present. The passenger seat in the front appears to have been removed prior to the fire, to facilitate the use of a wheel chair. The heaviest amount of damage was found to be in the front of the compartment that was found to extend upward and outward from the engine shroud on the driver's side.

With the use of a mobile lift device, the vehicle was raised to allow inspection of the underside. Damage from heat and smoke impingement was observed the approximate "B" pillar toward the rear of the vehicle. From this location, toward the front, on the left side there was evidence of burning to the components. The fuel filter and fuel rail along the left inside of the frame was found to have had direct flame contact that has damaged the filter and housing. There was evidence of a fuel involved fire from this location that propagated upward and outward.

Examination of the line connected to the fuel filter indicated that the fuel line from the tank has separated and allowed fuel to flow. The return line was found to have sustained heat damage, however, it was connected. From the heat patterns found in this area it appears that the burning was caused by falldown material from the fire above.

In the area of the left front wheel well there was extensive burn damage noted. This damage was attributed to the fire traveling upward from the area of the fuel filter and the separation of the brake line that allowed the brake fluid to be introduced to the heat. The fire had also propagated into the rubber tire.

The origin of fire was found to be at the left rear of the engine. This part of the engine is below the shroud or cover that protrudes into the passenger compartment. In this area an inspection of the electrical conductors was conducted. There was no evidence of electrical faulting or arcing found, eliminating them from causal effect.

Further found in this area was the fuel regulator for the fuel injector system. The return line was found to be missing from the regulator, however, the inlet line was intact.

It had been reported by the owner that the vehicle has experienced a situation where gasoline fumes were noted in the interior. This situation was checked at the dealership on at least one occasion. It was further reported that this condition had re-appeared and the vehicle was scheduled to be returned to the dealer to correct the situation.

During the examination it was found that supply line to the left bank injector and the return line from the right bank were missing and believed destroyed by the fire. Also missing was the return line to the fuel storage tank from the regulator.

This fuel system on this engine as with most fuel injected systems is a closed pressurized system. The smell of gasoline is an indication of a leak of fuel. The pressure in the system is normally set at approximately 39 P.S.I. from the fuel pump. During the running of the engine this pressure is variable by manifold pressure. Normal pressure when the ignition in the off position is held at 40 P.S.I. A leak in the area of the regulator from a supply line could produce a situation of gasoline fumes conducive to ignition by the heat of the engine. The use of ethanol mixed fuel could, combined with a leak, create an explosive condition.

After completion of the examination and elimination of all other causes the scenario described above cannot be ruled out.

This file will be held in an open status awaiting further instructions. The samples of the engine oil and the transmission fluid will be retained for future examination. Should you have any questions, please feel free to contact us.

Respectfully submitted,

John R. Wood, CFI
Fire Investigation Specialist

For the laboratory,

James Casassa, P.E.

JRW

STATE OF INDIANA)
) SS:
COUNTY OF HAMILTON)

IN THE HAMILTON CIRCUIT COURT

96 OCT 1 P 4:54

29C01-9610 CP 777

CAUSE NO. _____

[redacted]

Plaintiffs

vs.

FORD MOTOR COMPANY and
TOM WOOD FORD, INC.,

Defendants

COMPLAINT AND DEMAND FOR JURY TRIAL

Come now the Plaintiffs [redacted] individually and as husband and wife, an[redacted] as guardian of [redacted], by counsel, and for their causes of action against Ford Motor Company and Tom Wood Ford, Inc., allege:

1. The Plaintiffs a[redacted] as individuals and [redacted] as guardian of [redacted] The Plaintiffs reside in Marion County, Indiana. At all times relevant hereto, the Plaintiffs are husband and wife.

2. The Defendant, Ford Motor Company, is a foreign corporation incorporated in the State of Delaware with its principal place of business in Dearborn, Michigan, with a registered agent, C T Corporation System, in Marion County, Indiana.

3. At all times herein relevant, Tom Wood Ford, Inc., was an Indiana corporation.

4. The 1991 Ford Aerostar van in which [redacted] was injured, was manufactured by the Ford Motor Company.

5. The 1991 Ford Aerostar van in which [redacted] was injured, was sold by Tom Wood Ford, Inc., to [redacted] on or about the 14th day of September, 1993.

6. On or about December 10, 1994 the Plaintiff, [redacted] was operating the 1991 Ford Aerostar van in Putnam County, Indiana, with his wife, [redacted] as a passenger when the Plaintiffs thereafter had a motor vehicle collision.

7. In the collision the Plaintiff, [redacted] suffered serious and permanent bodily injuries.

8. Plaintiff [redacted] medical expenses are continuing in nature and at this time are unknown in total amount. In addition, the Plaintiff [redacted] has lost income and the opportunity to earn income in the future in an unknown amount. The [redacted] has suffered damages in loss of services and consortium.

9. The Defendants, Ford Motor Company and Tom Wood Ford, Inc., breached their duty to exercise reasonable care and the breach of this duty was a proximate cause of the Plaintiffs' injuries and damages.

10. The Ford motor vehicle owned by the Plaintiffs was in a defective condition unreasonably dangerous and said condition was a proximate cause of the damages to Plaintiffs.

11. The Defendant, Tom Wood Ford, Inc., breached its warranties to the Plaintiffs causing Plaintiffs' damages.

WHEREFORE, the Plaintiffs pray for a judgment which is just under the evidence, prejudgment interest, and all other proper relief.

Respectfully submitted,

PARDIECK, GILL & VARGO
A Professional Corporation

By: Roger Pardieck

Roger L. Pardieck, #5859-36
100 North Chestnut Street
P.O. Box 608
Seymour, IN 47274
(812) 523-8686

DEMAND FOR JURY TRIAL

The Plaintiffs demand trial by jury.

PARDIECK, GILL & VARGO
A Professional Corporation

By: Roger Pardieck

Roger L. Pardieck, #5859-36
100 North Chestnut Street
P.O. Box 608
Seymour, IN 47274
(812) 523-8686

STATE OF INDIANA,)
) SS:
COUNTY OF HAMILTON,)

IN THE HAMILTON CIRCUIT COURT

CAUSE NO. 29C01-9610 CP.777

[redacted])
)
)
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)
Plaintiffs)
)
v.)
)
FORD MOTOR COMPANY and)
TOM WOOD FORD, INC.)
)
Defendants)

FILED
95 OCT 11 AM 9:53
Barbara Rybak
CLERK HAMILTON COUNTY COURTS

APPEARANCE BY ATTORNEY IN CIVIL CASE

Party Classification: Initiating _X_ Responding ____ Intervening ____

1. The undersigned attorney and all attorneys listed on this form now appear in this case for the following party member(s):

[redacted]

2. Applicable attorney information for service as required by Trial Rule 5(B)(2) and for case information as required by Trial Rules 3.1 and 77(B) is as follows:

Name:	Roger L. Pardieck	Atty Number: #5859-36
Address:	100 N. Chestnut Street	Phone: (812) 523-8686
	P.O. Box 608	FAX: (812) 522-4199
	Seymour, IN 47274	Computer Address: pgv@pgvlaw.com

[List on continuation page the additional attorneys appearing for above party member(s).]

3. There are other party members: Yes ___ No _X_ (If yes, list on continuation page.)

4. If first initiating party filing this case, the Clerk is required to assign this case the following Case Type under Administrative Rule 8(b)(3):_____

5. I will accept service by FAX at the above noted number: No

6. This case involves support issues: No.

7. There are related cases: Yes ____ No _X_ (If yes, list on continuation page.)

8. This form has been served on all other parties. Certificate of service is attached: Yes.

9. Additional information required by local rule:

_____

_____

Roger L. Pardieck, Attorney-at-Law
Attorney Information Shown Above

CERTIFICATE OF SERVICE

I certify that a copy of the above and foregoing pleading was deposited in the United States mail, with postage prepaid, addressed to Ford Motor Company and Tom Wood Ford, Inc. at the addresses listed on the Summons, this 11 day of October, 1996.

Roger L. Pardieck

C.R

STATE OF INDIANA) IN THE HAMILTON CIRCUIT COURT
) SS:
COUNTY OF HAMILTON) CAUSE NO. 29C01-9610-CP-777

[redacted]
Plaintiffs

v.

FORD MOTOR COMPANY,
TOM WOOD FORD, INC.,
GARY AUTREY,
PALMENTERE BROS. CARTAGE
SERVICE, INC.,
Defendants

AMENDED COMPLAINT AND DEMAND FOR JURY TRIAL

Come now the Plaintiffs, [redacted], individually and as husband and wife, an[redacted] as guardian of [redacted], by counsel, and for their causes of action against Ford Motor Company, Tom Wood Ford, Inc., Gary Autrey and Palmentere Bros. Cartage Service, Inc., allege:

1. The Plaintiffs are T[redacted] as individuals and [redacted] as guardian of [redacted] The Plaintiffs reside in Marion County, Indiana. At all times relevant hereto, the Plaintiffs have been husband and wife.

2. At all times relevant, the Defendant, Ford Motor Company, was a foreign corporation incorporated in the State of Delaware with its principal place of business in Dearborn, Michigan, with a registered agent, C T Corporation System, in Marion County, Indiana.

3. At all times herein relevant, Tom Wood Ford, Inc., was an Indiana corporation.

4. At all times relevant, Defendant, Gary Autrey was a resident of Florida and was an employee of Palmentere Bros. Cartage Service, Inc. acting in the scope and furtherance of his employment.

5. At all times relevant, Defendant, Palmentere Bros. Cartage Service, Inc. was a foreign corporation with its principal place of business in Missouri.

6. The 1991 Ford Aerostar van in which T[redacted] was injured, was manufactured or otherwise introduced into the stream of commerce by the Ford Motor Company.

7. The 1991 Ford Aerostar van in which [redacted] was injured, was sold by Tom Wood Ford, Inc., to Barbara Purvis on or about the 14th day of September, 1993.

8. On or about December 10, 1994 the Plaintiff, [redacted], was operating the 1991 Ford Aerostar van in Putnam County, Indiana, with his wife, [redacted] as a passenger. The Plaintiffs thereafter had a motor vehicle collision in which their vehicle was struck by a semi operated by Gary Autrey. At the time of the collision, Gary Autrey was acting in the scope and furtherance of his employment with Palmentere Bros. Cartage Service, Inc.

9. In the collision the Plaintiff, [redacted] suffered serious and permanent bodily injuries.

10. Plaintiff [redacted] medical expenses are continuing in nature and at this time are unknown in total amount. In addition, the Plaintiff, [redacted] has lost income and the opportunity to earn income in the future in an unknown amount.

The Plaintiff, [redacted] has suffered damages in loss of services and consortium.

11. The Defendants, Ford Motor Company, Tom Wood Ford, Inc., and X-Corporation breached their duty to exercise reasonable care and the breach of this duty was a proximate cause of the Plaintiffs' injuries and damages.

12. The Ford Aerostar van operated by Plaintiff, Thomas Purvis, was in a defective condition unreasonably dangerous and said condition was a proximate cause of the damages to Plaintiffs.

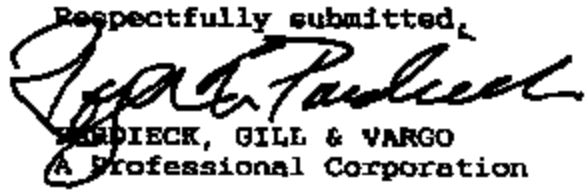
13. The Defendant, Tom Wood Ford, Inc., breached its warranties to the Plaintiffs causing Plaintiffs' damages.

14. Defendant Gary Autrey was negligent in the operation of the semi tractor trailer while acting in the scope and furtherance of his employment with Palmentere Bros. Cartage Service, Inc. The negligence of Gary Autrey acting in the scope and furtherance of his employment with Palmentere Bros. Cartage Service, Inc. was a proximate cause of the damages suffered by Plaintiffs.

15. That Palmentere Bros. Cartage Service, Inc. is responsible for the negligence of Gary Autrey in the scope and furtherance of his employment under the doctrine of respondeat superior.

WHEREFORE, the Plaintiffs pray for a judgment which is just under the evidence, prejudgment interest, and all other proper relief.

Respectfully submitted,



PODIECK, GILL & VARGO
A Professional Corporation

By: _____
Roger L. Pardieck, #5859-36
Bruce A. MacTavish, #11251-27
100 North Chestnut Street
P.O. Box 608
Seymour, IN 47274
(812) 523-8686

DEMAND FOR JURY TRIAL

The Plaintiffs demand trial by jury.

Respectfully submitted,

PARDIECK, GILL & VARGO
A Professional Corporation

By: _____
Roger L. Pardieck, #5859-36
Bruce A. MacTavish, #11251-27
100 North Chestnut Street
P.O. Box 608
Seymour, IN 47274
(812) 523-8686

CERTIFICATE OF SERVICE

I certify that a copy of the above and foregoing pleading was deposited in the United States mail, with postage prepaid, addressed to Joan Fullam Irick, Esq., KIGHTLINGER & GRAY, 660 Market Square Center, 151 North Delaware Street, Indianapolis, IN 46204; Charles R. Sheeks, Esq., SHEEKS ITTENBACH & JOHNSON, 6350 N. Shadeland Avenue, Suite 4, Indianapolis, IN 46220; and Ellen Boshkoff, Esq. and Albert J. Dahm, Esq., BAKER & DANIELS, 300 North Meridian, Suite 2700, Indianapolis, IN 46204, on this 6th day of December, 1996.

_____
Roger L. Pardieck

EA05-005-LC-8132

IN THE CIRCUIT COURT OF HAMILTON COUNTY

STATE OF INDIANA

[redacted]

Individually and as Husband and Wife,
and
[redacted]

Plaintiffs,

v. CAUSE NO. 29C01-9610-CP-777

FORD MOTOR COMPANY, TOM WOOD FORD, INC., GARY AUTRY, PALMENTERE BROS. CARTAGE SERVICE, INC.,
Defendants

ORDER

Come now the Plaintiffs, by counsel, and file their Motion for Leave to Amend Complaint and Demand for Jury Trial, which is in the following words and figures, to-wit:

(H.I.)

And the Court being duly advised in the premises now finds that Plaintiffs' Motion should be granted.

IT IS THEREFORE, ORDERED, ADJUDGED AND DECREED that Plaintiffs are hereby granted Leave to File their Amended Complaint and Demand for Jury Trial.

ALL OF WHICH IS SO ORDERED THIS 6 DAY OF DECEMBER, 1996.

Judith L. Proffitt
JUDGE, HAMILTON CIRCUIT COURT

EA05-005-LC-8133

Distribution:

Joan Irick
660 Market Square Center
151 North Delaware Street
Indianapolis, IN 46204

Charles Sheeks
6350 North Shadeland Avenue
Suite 4
Indianapolis, IN 46220

Ellen Boshkoff
Albert Dahm
BAKER & DANIELS
300 North Meridian
Suite 2700
Indianapolis, IN 46204

Roger Pardieck
Bruce Mac Tavish
100 North Chestnut Street
P.O. Box 608
Seymore, IN 46274

EEM 27837-141-EE

FILED
LORAIN COUNTY

IN THE COURT OF COMMON PLEAS OF LORAIN COUNTY
LORAIN COUNTY, OHIO

JAN 24 2 29 PM '96

CLERK OF COMMON PLEAS
DONALD J. ROTHGERY

[redacted]

Plaintiff,

-vs-

FORD MOTOR COMPANY,
% Statutory Agent
C.T. Corporation System
815 Superior Avenue N.E.
Cleveland, Ohio 44114

Defendants.

CASE NO.:

JUDGE:

96CV115670

COMPLAINT

JUDGE LYNETT M. McGOUGH

1. Plaintiff insurance company was at all times material herein, the insurer, assignee and subrogee of Judy and Alfred Purdie.

2. Defendant Ford Motor Company is a corporation licensed to do business in the State of Ohio, and is a manufacturer as defined by Ohio Revised Code $2307.71(I), engaged in the design, construction, assemblage, formulation and/or creation of motor vehicles for sale to consumers.

3. On or about December 12, 1994, Plaintiff's insureds purchased a motor vehicle, a 1995 Ford van, VIN Number 1FMHE31H6SH[redacted], said motor vehicle being the subject of this cause of action.

4. The above referenced motor vehicle was formulated, designed, constructed and/or assembled by Defendant Ford Motor Company, with a final assembly point of said motor vehicle being at the Lorain Ford Plant, Lorain County, Ohio.

5. On or about May 25, 1995, in the City of Ellettsville, State of Indiana, Plaintiff's insureds motor vehicle was damaged and caused to depreciate in value when it caught fire and burned, destroying the motor vehicle and the contents therein.

6. Plaintiff's insured's motor vehicle, as produced by Defendant Ford Motor Company, was defective in design, manufacture, formulation, construction and/or assemblage, and was defective when it left the control of Defendant Ford Motor Company.

ERDS-005-LC-0135

7. Defendant Ford Motor Company was negligent in the design, formulation, construction, manufacturing and/or assemblage of Plaintiff's insured's motor vehicle.

8. Defendant Ford Motor Company breached implied and expressed warranties of merchantability in that the motor vehicle manufactured and sold by Defendant was unsafe and unfit for the purposes for which such motor vehicles used.

9. Defendant Ford Motor Company breached implied and expressed warranties of fitness for a particular purpose in that the motor vehicle sold by Defendant was unsafe and unfit for the purposes for which the vehicle was intended to be used by Plaintiffs insureds.

10. As a direct and proximate result of Defendant Ford Motor Company's negligence and as a result of Defendant's breach of warranties as more fully set forth above, Plaintiff's insured's motor vehicle and personal property were damaged and destroyed, and Plaintiff's insured's suffered loss in the amount of $37,390.05.

11. Plaintiff insurance company was required to pay to or on behalf of its insureds the sum of $37,340.05 and thereby became subrogated to that amount.

WHEREFORE, Plaintiff demands judgment against the Defendant in the amount of $37,340.05; and for the costs incurred in bringing this action.

KREINER & PETERS CO., LPA

KEITH R. MCMURDY
Attorney for Plaintiffs
6047 Frantz Road #203
Dublin, Ohio 43017
(614) 793-1770
Registration No. 0062108

USAA

USAA CASUALTY INSURANCE COMPANY
9800 Fredericksburg Road, San Antonio, TX 78288

FORD MOTOR COMPANY
OFFICE OF THE GENERAL COUNSEL
PARKLANE TOWERS WEST
STE 300
3 PARKLANE BLVD
DEARBORN MI 48126

FORD MOTOR COMPANY
RE
CL
JUN 1 9 1995
OFFICE OF THE GENERAL COUNSEL

June 9, 1995

Policyholder: [redacted]
Reference Number: [redacted]
Date Of Loss: May 25, 1995
Loss Location: Gosport, Indiana
REFERENCE: TOTAL FIRE CLAIM - 95 FORD CLUB WAGON
INVESTIGATING: FUEL LEAK
OWNER: [redacted]

DEAR SIRS:

This is to advise Ford Motor Company that I am handling a claim for our insured Judy Purdie. [redacted] owns a 1995 Ford Club Wagon that caught on fire and was deemed to be a total loss. We are investigating this claim to determine whether we will have a claim against your company. Our insured has documentation of the problems she has reported to Bloomington Ford in Bloomington, Indiana. One of the problems was the smell of gas.

If you would like to have your own representative inspect this vehicle call be for location.

Sincerely,

Sue Guerrero

Sue M. Guerrero
Senior Auto Claims Representative
Great Lakes Region
Phone: 1-800-531-8222 Ext. 79329

5231251-- 10 - IN - 05/25/95 - 1018 - 37 - C200

EA85-085-LC-8137

State Form 40328 (R/7-87)

FIRE INCIDENT REPORTING SYSTEM

INDIANA DEPARTMENT OF FIRE AND BUILDING SERVICES

Ellettsville Fire Department

NFIRS-1

1 = DELETE REC
2 = CHANGE

PLEASE PRINT OR TYPE, IN YOUR OWN WORDS, WITH A WRITER AND CODED REPORT. ONLY NECESSARY, LEAVING BOTTOM BLANK, BLOCKING N/A CODE WHEN NEEDED

INCIDENT REPORT

IF USED FOR FIRE SERVICE CHARGE REPORT, BE SURE TO FILL OUT LINE Y.

CHASE THASH PARKS SECRET FORM

A	FDID 5310195	INCIDENT NO. 9510166	YEAR 90	MO. 05	DAY 23	YEAR 95	DAY OF WEEK	ALARM TIME 1154	ARRIVAL TIME 1157
B	TYPE OF SITUATION FOUND						TYPE OF ACTION TAKEN		MUTUAL AID 5301
C	FIXED PROPERTY USE Open Field 931						IGNITION FACTOR Fuel Leak 51		
D	[redacted] Bosport								CENSUS TRACT
E	[redacted]								ROOM or APT
G	[redacted]						DISTRICT 162	SHIFT 2	ALARMS 1
H	FIRE PERSONNEL RESPONDED 0016	ENGINES RESPONDED 0011	AERIAL APPARATUS RESPONDED 000	OTHER VEHICLES RESPONDED 000					
I	INCIDENT - RELATED INJURIES	COMPLETE NFIRS 3 FIRE SVC	COMPLETE NFIRS 3 OTHERS	INCIDENT - RELATED FATALITIES	COMPLETE NFIRS 3 FIRE SVC	COMPLETE NFIRS 3 OTHERS			
J	COMPLEX Farm 65			MOBILE PROPERTY TYPE Auto Heavy Le 111	COMPLETE LINE 9	00 = N/A			
K	AREA OF FIRE ORIGIN Engine 83			EQUIPMENT INVOLVED IN IGNITION (IF ANY)	COMPLETE LINE 7	NFIRS N/A			
L	FORM OF HEAT OF IGNITION (Heat Source)	TYPE OF MATERIAL IGNITED (Consumed)	FORM OF MATERIAL IGNITED (Use)						
M	METHOD OF EXTINGUISHMENT	LEVEL OF FIRE ORIGIN	ESTIMATED TOTAL DOLLAR LOSS 38,000						
N	NUMBER OF STORIES	CONSTRUCTION TYPE							
O	EXTENT OF DAMAGE								
P	DETECTOR PERFORMANCE	SPRINKLER PERFORMANCE							
Q	TYPE OF MATERIAL GENERATING MOST SMOKE	AVENUE OF SMOKE TRAVEL							
R	FORM OF MATERIAL GENERATING MOST SMOKE								
S	IF MOBILE PROPERTY VAN	YEAR 1995	MAKE Ford	MODEL E350	SERIAL NO. 1FMNE3 31HLSHA28868	LICENSE NO. Hamilton 13674			
T	IF EQUIP. INV. IN IGN.	YEAR	MAKE	MODEL	SERIAL NO.				
U	OFFICER IN CHARGE AT INCIDENT (NAME) James Davis	POSITION Chief	DATE 5-25-95						
V	INSURANCE COMPANY	SIGNATURE	Owner or Representative						

COMPLETE ON ALL INCIDENTS

COMPLETE IF CASUALTY

COMPLETE FOR ALL FIRES

COMPLETE IF STRUCTURE FIRE

ALL INCIDENTS

E006-005-LC-0130

RETURN TO STATE FIRE MARSHAL ON A MONTHLY BASIS

* Check box if entries are made on reverse side

523 12 51

1015-11

EA05-085-LC-8139

[redacted]

JUN 07 2005

CUSTOMER RELATIONSHIP CENTER

SPARTAN ADJUSTING COMPANY, L.L.C.

P.O. Box 1608
Friendswood, Tx. 77549-1608

Telephone (281) 652-3698
Fax (281)652-3663

2005 JUN -7 A 8:32

June 1, 2005

FORD MOTOR COMPANY
RECEIVED
CLAIMS UNIT
JUN 08 2005
OFFICE OF THE GENERAL COUNSEL

Ford Motor Company
Consumer Affairs
PO Box 6248 MD-3NE-B
Dearborn, Michigan 48126

RE: Our Insured [redacted]
Our Claim Number [redacted]
Date of Loss :10-29-04
Total Amount Due :$17129.18
Company Portion :$16612.18
Insured's Portion :$517.00

To Whom It May Concern:

I am submitting a subrogation demand for the above amounts in reference to a loss associated with recall number 05S28 Cruise Control. On 10-29-04 [redacted] 2001 Ford F-150 Lariat caught on fire, all indications point to the cruise control as the ignition point of fire.

Please accept this letter as notice of our subrogation rights under vehicle damage. We have made payment to our insured regarding this loss and request reimbursement.

If you have any questions, please contact me at the above number at extension 3532.

Sincerely,

Vanessa Filla

Vanessa Filla
Claims Adjuster

EA05-005-LC-0140

11/03/2004 at 12:35 PM File# 74599-00008937 File ID 004-1104DB
Owner: [redacted] Appraiser: David Betcher
2001 FORD F150 4X2 SUPERCAB 6-4.2L-FI 4D SHORT GOLD Int:TAN

DCA ENTERPRISES
P.O.Box1619
New Caney, TX 77357
Business: (281)399-0900

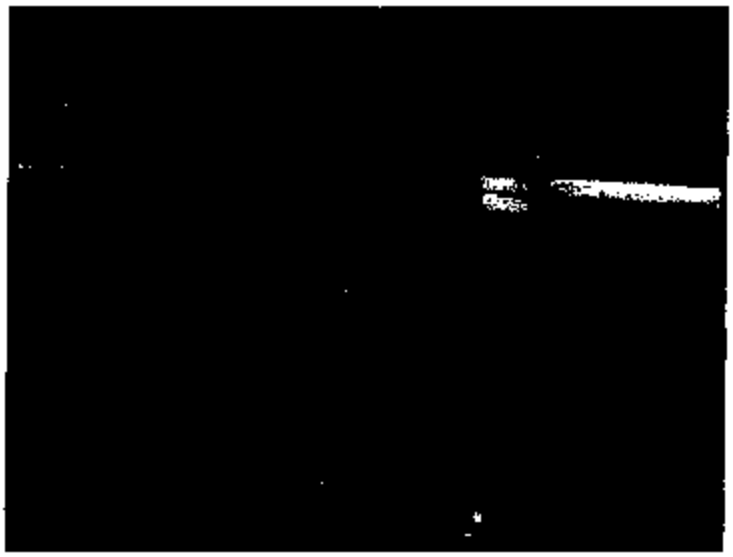
IMAGE REPORT

11/02/2004: EST01:

11/02/2004: EST01:

11/03/2004 at 12:35 PM File# 74599-00008937 File ID 004-1104DB
Owner: [redacted] Appraiser: David Betcher
2001 FORD F150 4X2 SUPERCAB 6-4.2L-FI 40 SHORT GOLD Int:TAN

IMAGE REPORT



11/02/2004: EST01:

11/02/2004: EST01:

11/03/2004 at 12:35 PM File# 74599-00008937 File ID 004-1104D8
Owner: [redacted] Appraiser: David Betcher
2001 FORD F150 4X2 SUPERCAB 6-4.2L-FI 4D SHORT GOLD Int:TAN

IMAGE REPORT

11/02/2004: EST01:

[redacted]

Accelerated Recovery Services, Inc.

P.O. Box 2368 Redwood City, California 94064 Tel: 650.298.0183 Toll Free: 800.335.9474 Fax: 650.298.9191

February 12, 2004

CORNING FORD
ATTN: STEVE LOWERY
2280 SHORT DRIVE
CORNING, CA 96021

FORD MOTOR COMPANY
RECEIVED
MAR 03 2004
OFFICE OF THE
GENERAL COUNSEL

Re: Account # [redacted]
Current Balance: $26,539.86
Re: California State Automobile Association

Dear CORNING FORD:

This firm represents California State Automobile Association ("CSAA") regarding the auto fire that happened on October 21, 2002. I have a subrogation demand in the amount of $26,539.86, that represents payments made by CSAA to their insured and the loan company for the loss, as well as rental costs for their insured. Attached, please find the fire investigation report, drafts, estimates and photographs to substantiate the payments made by CSAA on behalf of their insured.

Upon acceptance of liability please forward your draft made payable to CSAA to: Post Office Box 2368, Redwood City, CA 94064 to my attention.

Should you have any questions regarding this subrogation demand please do not hesitate to contact me at 800.335.9474 X 202. Your professional attention to this matter is appreciated.

Sincerely,

Accelerated Recovery Services, Inc.

Julie Bridges, Subrogation Legal Specialist

- $26,539.86
10/21/02
- '00 Exel
- $3,000 (M) ??
+ Rental incl.

This is an attempt to collect a debt. Any information obtained will be used for that purpose.

ER05-605-LC-0144

Fire Investigation Report

Opinions rendered in this report are based upon available information at the time the report was drafted and draw upon the training, education, and experience of the personnel involved in the investigation.

REPORT DATE: 11/4/02	INSURED: [redacted]
REQUEST BY: A. MORGAN	CLAIM #: [redacted]
INSPECTION DATE: 10/31/02	DATE OF LOSS: 10/21/02
ODOMETER: DESTROYED	UNIT: 2000 FORD EXPLORER
VIN: 1FMZU74E3YZA49383	LICENSE: 4JFY271
LOCATION OF UNIT:	COPART 1705 MARIETTA WAY SPARKS, NV. 89431
INSPECTION PURPOSE:	DETERMINE ORIGIN AND CAUSE OF A FIRE LOSS.

Background

I received a request from Amy Morgan, CSAA Salvage Department, to inspect the insured's vehicle to determine the origin and cause of a fire loss. The insured reported the vehicle caught fire in the engine compartment while being operated when entering a parking lot. The insured also reported that recent repairs were performed under warranty to repair a leak from the rear differential assembly 9/17/02 at odometer reading 52,727.

Inspection

The vehicle was inspected at the Copart Salvage Facility in Sparks, NV. I identified the vehicle using the VIN plate and Federal Safety Label. Examination found evidence of a relatively localized fire having occurred at the forward portion of the vehicle. The left front fender and hood panel were scorched. The left side of the front grille and left lamp assembly were melted and sagging. The left front tire was burned and deflated. Black soot was visible at the lower left portion of the front windshield.

Interior examination found fire damage limited to the left side of the instrument panel and firewall area due to flame penetration through firewall openings from the engine compartment. Inspection of interior electrical wiring found no evidence of electrical short circuit to ground or electrical overload. Inspection of the vehicle odometer found that it was physically damaged from some type of object or tool not related to the actual fire itself. It was not determined during the course of this investigation who intentionally damaged the odometer.

Undercarriage examination found no evidence of oil or hydraulic fluid leaks prior to this fire. No evidence of leakage was found at any portion of the recently serviced rear differential assembly. Examination of exhaust system components found no soot or char that would indicate the ignition of a combustible substance in contact with exhaust system components.

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Engine compartment examination found heavy damage from fire. Plastic and rubber materials were either burned or melted with the least amount of damage at the right side of the compartment. The heaviest burn damage was at the left side of the engine compartment between the engine assembly itself and the left front fender. The engine oil was found at a safe operating level. The automatic transmission fluid registered about one inch above the "Full" mark which would be considered normal with out the engine running. The plastic power steering reservoir at the left front of the engine compartment was burned and melted allowing the escape of power steering fluid. The brake master cylinder and brake fluid reservoir were missing and presumed to have been consumed by fire. The plastic left inner fender well was also missing and presumed to have been consumed by fire.

Examination at the area of greatest fire damage found the flexible portion of the fuel supply line disconnected from the rigid portion of fuel supply line at the left front frame rail area. Examination of the braided steel flexible portion of line found it heavily kinked adjacent to where it would normally connect to the rigid line. This flexible portion of line is intended to be permanently attached to the rigid line with a machine crimped retaining clamp. This clamp was found to be still in place at the end of the flexible line. No tool marks that would indicate the crimped connection had be serviced or modified since it was originally manufactured were found. Inspection of disconnected flexible fuel line routing revealed it was improperly positioned when clamped in the retaining bracket at the left side of the engine assembly. This left an excessive amount of flexible fuel line between the engine bracket and fuel injector rail and an insufficient amount of flexible line between the engine bracket and the rigid line at the frame rail.

Summary

A. Insured's vehicle catches fire in engine compartment while being operated. Insured reported recent repairs for a rear differential leak condition.

B. Examination found evidence of a relatively localized fire having occurred in the engine compartment.

C. Area of greatest fire damage at left side of engine compartment between engine assembly and left front fender. No evidence of oil or hydraulic fluid leaks prior to this fire was found. No evidence of electrical short circuit to ground or electrical overload found.

D. Flexible fuel supply line disconnected from rigid fuel line at left front frame rail area at area of greatest fire damage.

E. Flexible fuel line kinked near disconnected end. Flexible fuel line mispositioned at engine bracket. Insufficient slack in flexible portion of fuel line between engine bracket and rigid line at frame rail due to improper installation at engine bracket.

F. Engine replaced under warranty 1/11/01 at odometer reading 031,081.

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Conclusion and Opinion

Following examination of the insured's vehicle, it is my opinion that this fire originated at the left side of the engine compartment. The cause should be considered the ignition of fuel vapors due to a disconnected fuel supply line. Ignition of the fuel vapors was likely from charging system or ignition sparks normally present in the engine compartment while the vehicle is being operated.

The fuel supply line was obviously pulled off due to insufficient slack between the engine and the frame rail. The engine itself is isolated from the frame of the vehicle allowing the engine to move somewhat in relation to the frame. This continued movement of the engine would have continuously pulled on the flexible portion of fuel line resulting in the noted kink in the line and eventually pulling the line off near the frame rail.

The bracket that secures the flexible line to the engine block actually clamps the line to the bracket eliminating any sliding type movement of the fuel line. There was no provision for the fuel line to be secured in a particular position in the bracket leaving it up to the installer to visually position the fuel line correctly to prevent the line from being kinked or pulled off during normal vehicle operation. Since this flexible portion of fuel line had to be removed when the engine was replaced, this should not be considered a manufacturing defect. The only repair to the vehicle that was found in the invoices supplied by the insured that would require removal of the fuel line is the engine replacement on 1/11/01 at Future Ford under warranty claim #396027. It is my opinion that subrogation be pursued.

Douglas E. Bailey

Douglas E. Bailey,
Mechanical Evaluator/Fire Investigator

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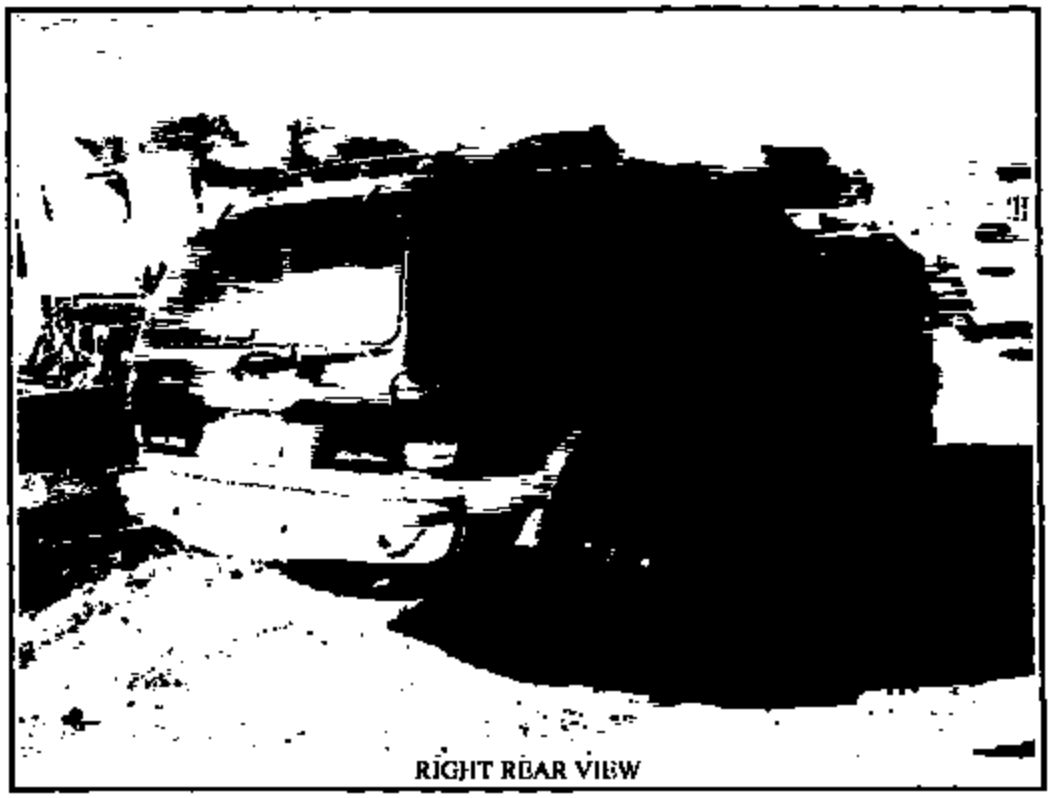
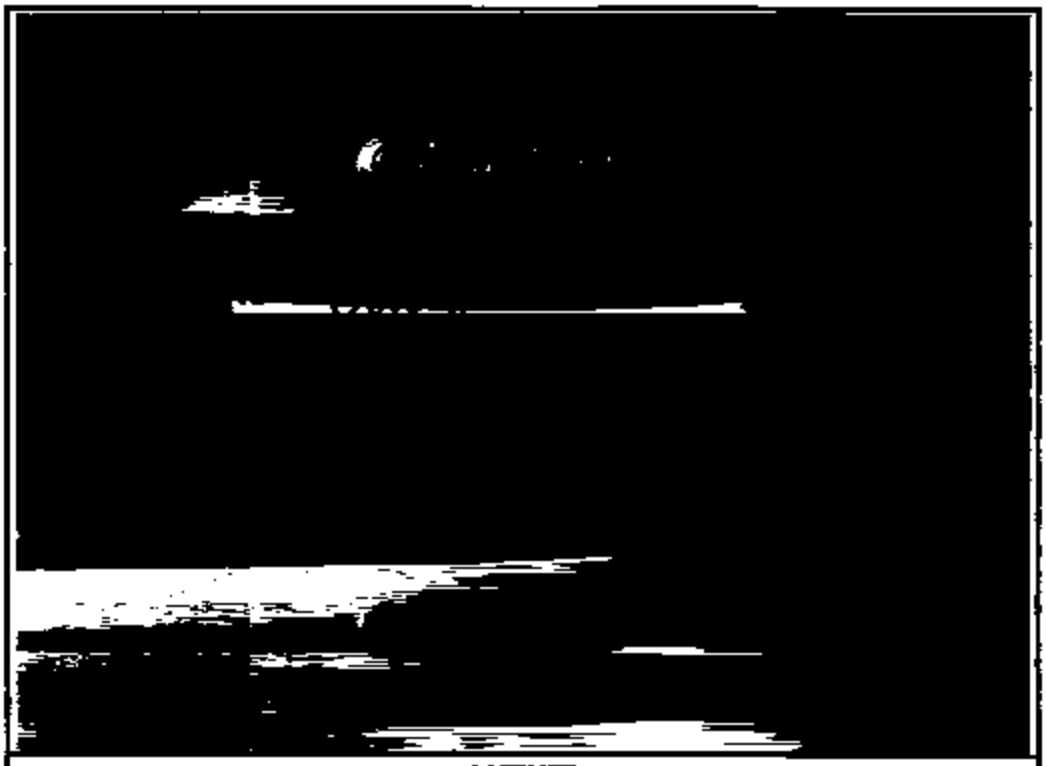
LEFT FRONT VIEW

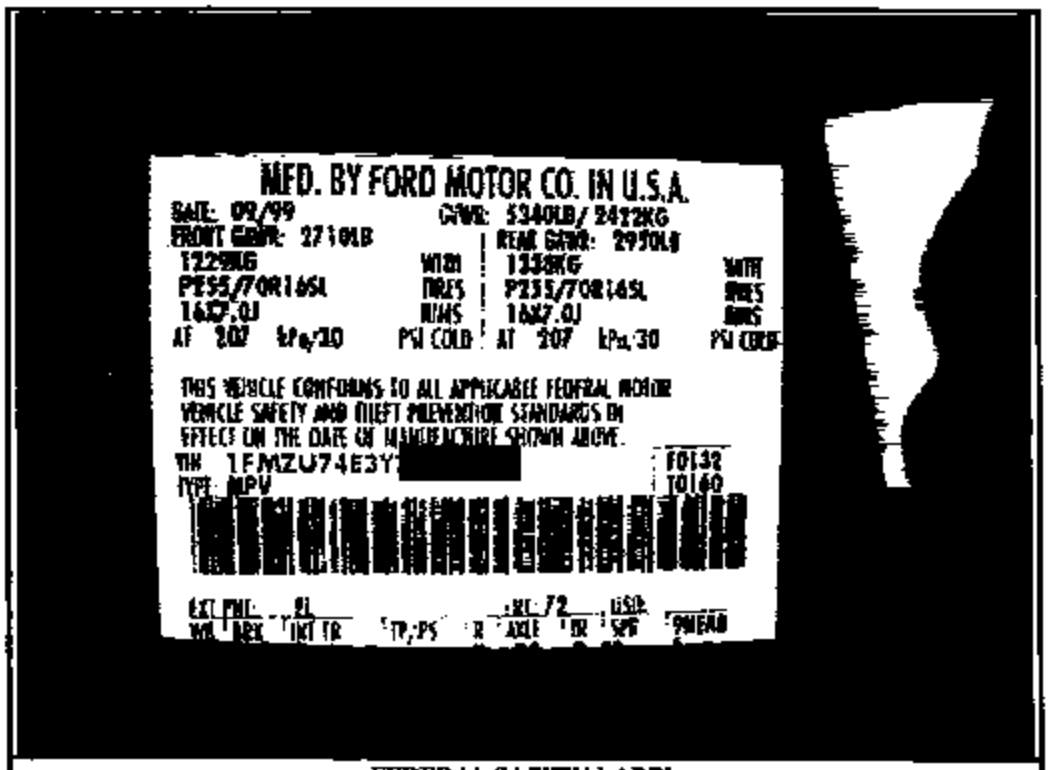


RIGHT REAR VIEW

[redacted]	CLAIM OR POLICY NUMBER: [redacted]	DATE OF LOSS: 10/21/02



LICENSE



FEDERAL SAFETY LABEL

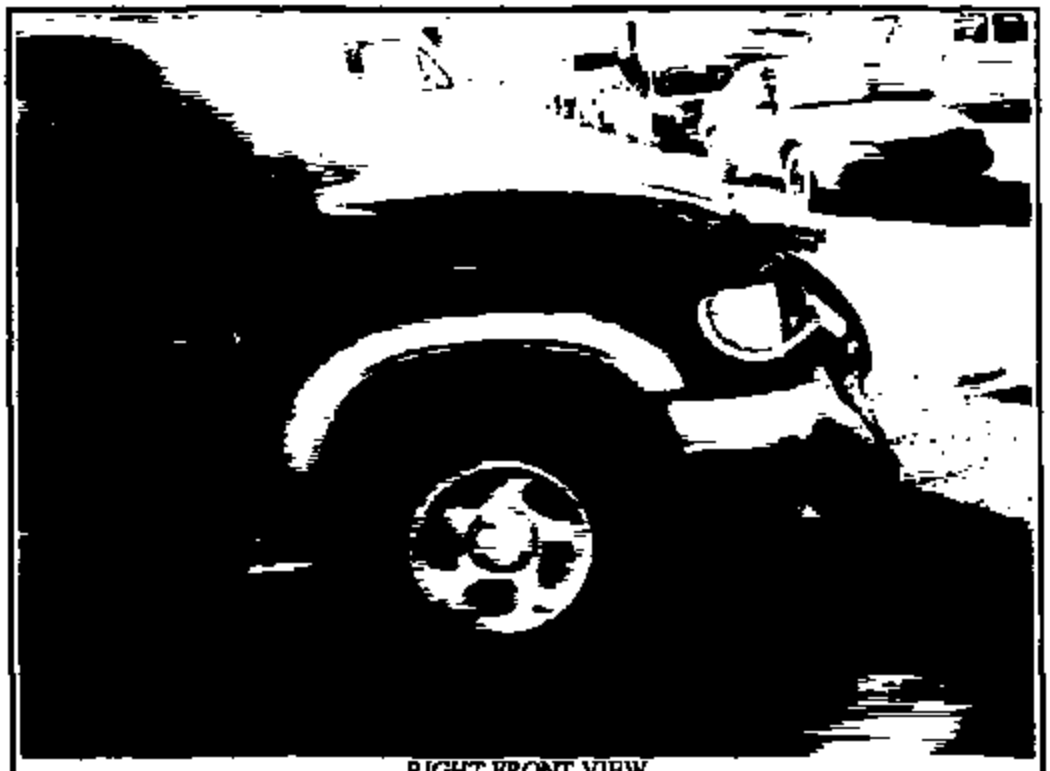
INSURED:	CLAIM OR POLICY NUMBER:	DATE OF LOSS:
[redacted]	[redacted]	10/21/02

ODOMETER

INTERIOR VIEW

INSURED:	GLADIATOR POLICY NUMBER:	DATE OF LOSS:
[redacted]	[redacted]	10/21/02

INTERIOR VIEW FROM REAR



RIGHT FRONT VIEW

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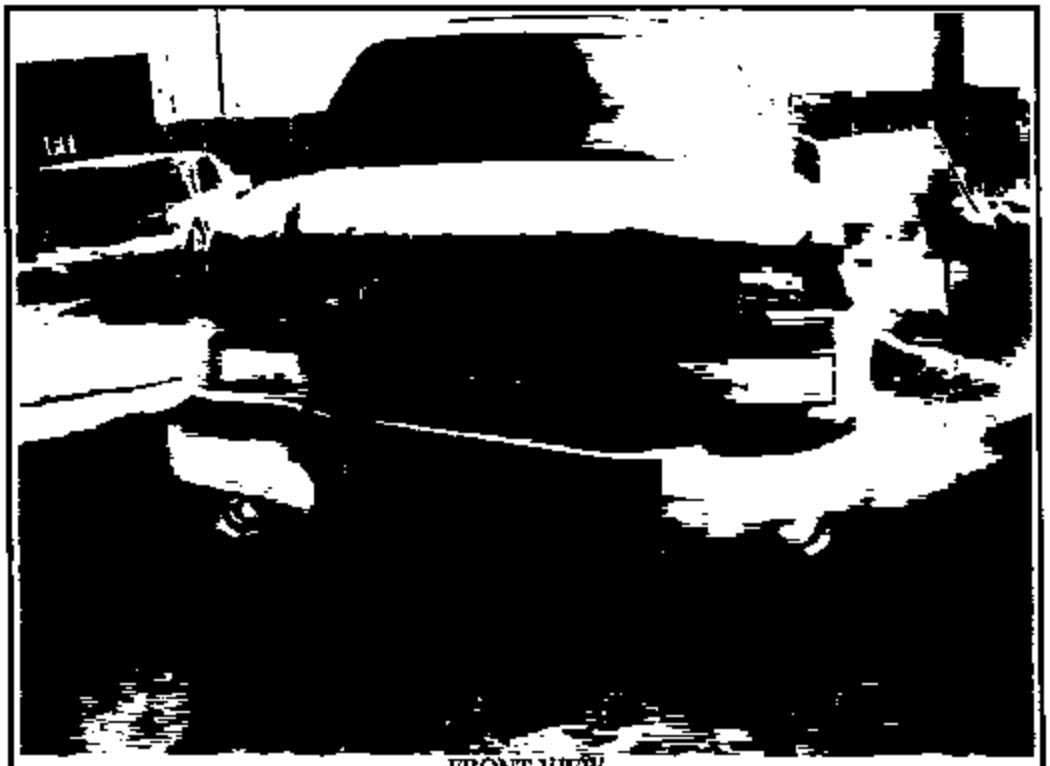
LEFT FRONT VIEW



FRONT VIEW

INSURED:	CLAIM OR POLICY NUMBER:	DATE OF LOSS:
[redacted]	[redacted]	10/21/02

HOOD PANEL

UNDERSIDE OF HOOD PANEL

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UNDERSIDE OF HOOD PANEL WITH SOUND DEADENING MATERIAL REMOVED

ENGINE COMPARTMENT VIEW FROM FRONT

INSURED:	CLAIM OR POLICY NUMBER:	DATE OF LOSS:
[redacted]	[redacted]	10/21/02

ENGINE COMPARTMENT VIEW FROM RIGHT SIDE

ENGINE COMPARTMENT VIEW FROM LEFT SIDE

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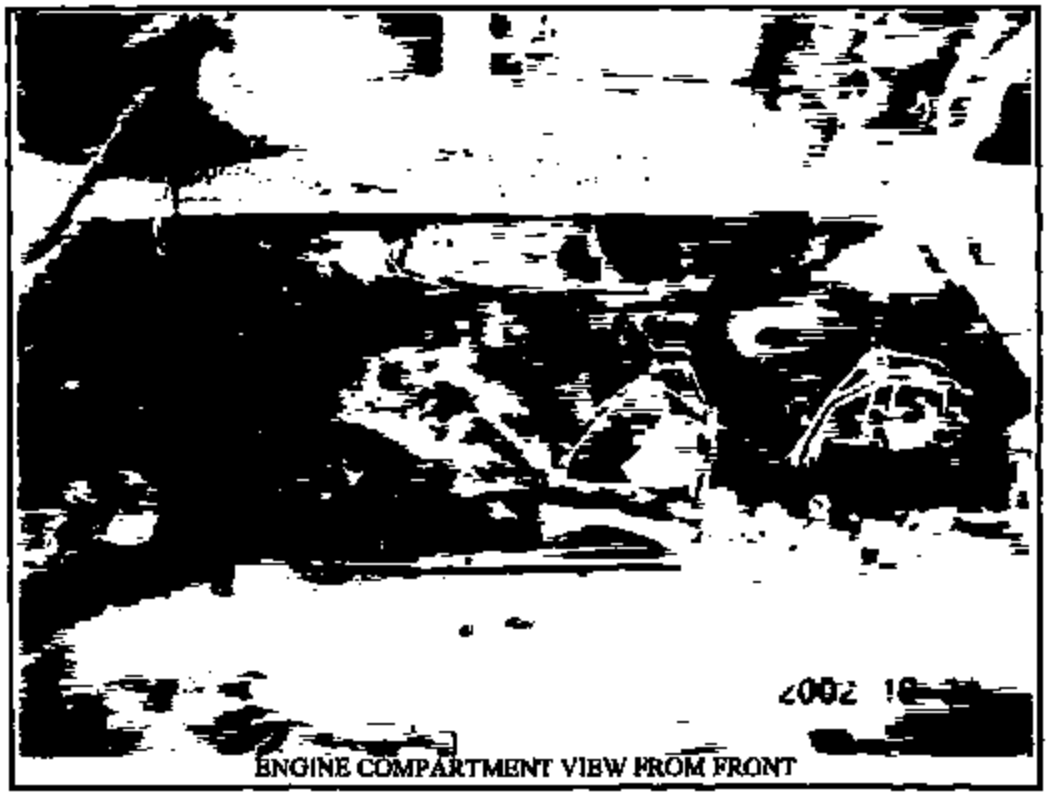
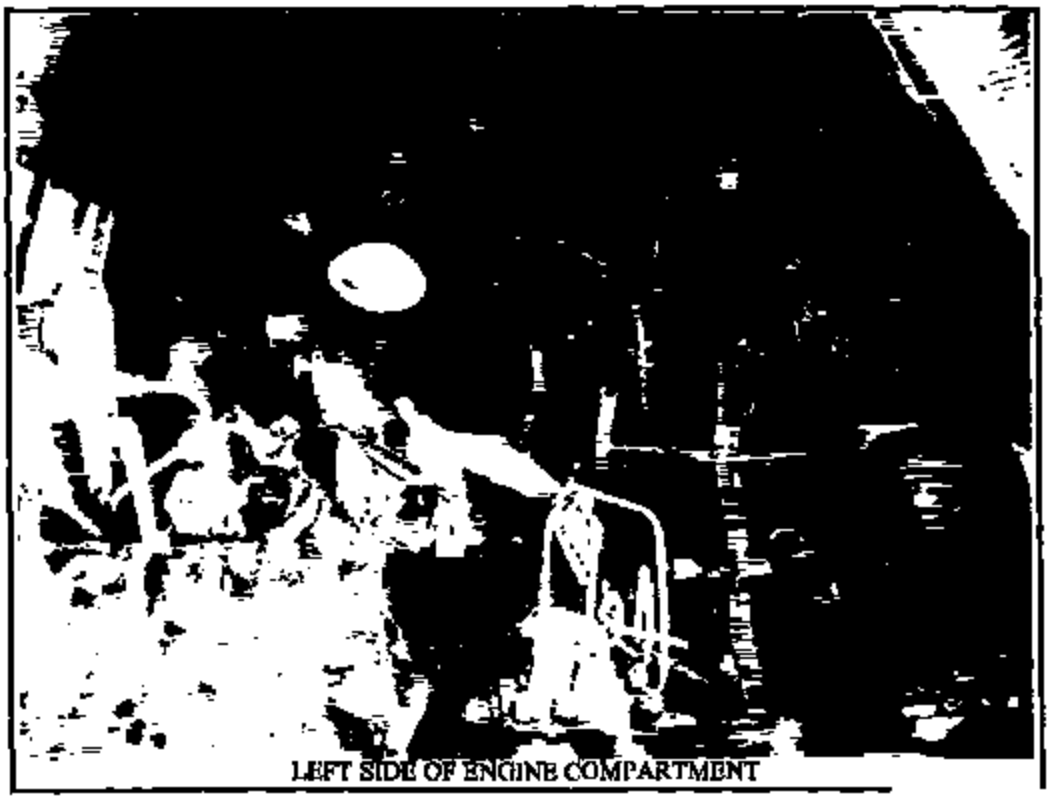


ENGINE COMPARTMENT VIEW FROM FRONT



LEFT SIDE OF ENGINE COMPARTMENT

INSURED:	CLAIM OR POLICY NUMBER:	DATE OF LOSS:
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DISCONNECTED FUEL LINE AT LEFT SIDE OF ENGINE COMPARTMENT

VIEW OF KINK AT BRAIDED PORTION OF FUEL LINE

INSURED:	CLAIM OR POLICY NUMBER:	DATE OF LOSS:
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AREA WHERE FUEL LINE IS CLAMPED TO SIDE OF ENGINE BLOCK

CLOSE UP OF CLAMP USED TO SECURE BRAIDED FUEL LINE TO ENGINE BLOCK

INSURED:	CLAIM OR POLICY NUMBER:	DATE OF LOSS:
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BRAIDED FUEL LINE ATTACHED TO INJECTOR FUEL RAIL AT TOP OF ENGINE

VIEW OF FUEL LINE AT UNDAMAGED EXEMPLAR VEHICLE

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VIEW OF FUEL LINE AT LEFT FRONT FRAME RAIL AREA OF EXEMPLAR VEHICLE WITH NO KINK PRESENT.

FRONT UNDERCARRIAGE VIEW OF INSURED'S VEHICLE

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