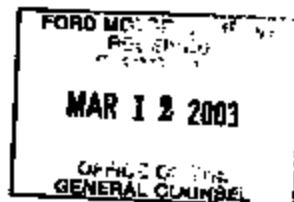


March 10, 2003

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



CERTIFIED RETURN RECEIPT REQUESTED

RE: State Farm Claim #: 42-1584-608
Our Insured: [REDACTED]
Date of Loss: 03/07/03
Vehicle involved: '01 Ford F150
VIN: 1FTRW07W1K [REDACTED]

The identified 2001 Ford F150 is insured by State Farm Fire and Casualty Co.
This vehicle experienced a fire and may be a total loss.

State Farm would like to give you an opportunity to inspect this 2001 Ford F150
And give you advanced notice of our potential subrogation claim.

Please contact me at 423 855-6780 for more information regarding this loss.

Sincerely,

W.T. Siler
Terry Siler
Claim Specialist
(423) 855-6780

PD 24448
Chate TN 37422

- 3/7/03
- 101 F-150
- VIN
- 88

ENG-005-LC1-1002

| | | | |
|---|--|---|---------|
| A 47832 03 07 2003 26 03-0302731 000 PDU * Date * Incident Date * Tagline * Incident Number * Dispatch * | | Change * No Activity * | Basin * |
| B Location* <input checked="" type="checkbox"/> Street address <input type="checkbox"/> Intersection <input type="checkbox"/> In front of <input type="checkbox"/> Rear of <input type="checkbox"/> Adjacent to <input type="checkbox"/> Through/other Address/Location: [REDACTED] City: Knoxville State Zip/City/State: [REDACTED] Street Type: [REDACTED] Route: [REDACTED] Mile: [REDACTED] | | | |
| C Incident Type * 141 [REDACTED] | | E1 Date & Times Month Year Hour Min Sec Alarm * 03 07 2003 14:36:00 Arrived * 03 07 2003 14:41:00 Controlled * 03 07 2003 14:47:00 Lock Unit * 03 07 2003 15:59:00 | |
| D Aid Given or Received* 1 <input type="checkbox"/> Medical aid received 2 <input type="checkbox"/> Subcutaneous aid recov. 3 <input type="checkbox"/> Medical aid given 4 <input type="checkbox"/> Subcutaneous aid given 5 <input type="checkbox"/> Other aid given 6 <input checked="" type="checkbox"/> None | | E2 Shift & Alarm Local option Shift of Alarm District E3 Special Studies Local option Special Study Code | |
| F Actions Taken * 11 [REDACTED] Primary Action Taken (1) Additional Action Taken (2) Additional Action Taken (3) | | G1 Response * <input checked="" type="checkbox"/> Check this box and skip this section if an Apparatus or Personnel were used. Apparatus 0002 0004 Personnel 0002 0004 G2 Estimated Dollar Losses & Values LOSSER: Required for all fires if known. Optional for non fires. Property \$ [REDACTED] 000 000 Contents \$ [REDACTED] 000 000 Structure \$ [REDACTED] 000 000 Other \$ [REDACTED] 000 000 | |
| H1 Casualties Deaths Injuries Fire Service [REDACTED] Civilian [REDACTED] | | H2 Detection Required for Confined Fires. 1 <input type="checkbox"/> Detector alerted occupants 2 <input type="checkbox"/> Detector did not alert them 3 <input type="checkbox"/> Unknown | |
| H3 Hazardous Materials Release 1 <input type="checkbox"/> Material Gas: after leak, no reaction or smoke visible 2 <input type="checkbox"/> Material Gas: after leak, no reaction or smoke visible 3 <input type="checkbox"/> Material Gas: after leak, no reaction or smoke visible 4 <input type="checkbox"/> Material Gas: after leak, no reaction or smoke visible 5 <input type="checkbox"/> Material Gas: after leak, no reaction or smoke visible 6 <input type="checkbox"/> Material Gas: after leak, no reaction or smoke visible 7 <input type="checkbox"/> Material Gas: after leak, no reaction or smoke visible 8 <input type="checkbox"/> Material Gas: after leak, no reaction or smoke visible 9 <input type="checkbox"/> Material Gas: after leak, no reaction or smoke visible 0 <input type="checkbox"/> Material Gas: after leak, no reaction or smoke visible | | I Mixed Use Property 10 <input type="checkbox"/> Assembly use 20 <input type="checkbox"/> Educational use 30 <input type="checkbox"/> Medical use 40 <input type="checkbox"/> Residential use 50 <input type="checkbox"/> Office use 60 <input type="checkbox"/> Industrial use 70 <input type="checkbox"/> Military use 80 <input type="checkbox"/> Farm use 90 <input type="checkbox"/> Other mixed use | |
| J Property Use* 131 <input type="checkbox"/> Church, place of worship 161 <input type="checkbox"/> Restaurant or cafeteria 162 <input type="checkbox"/> Bar/ Tavern or nightclub 213 <input type="checkbox"/> Elementary school or kindergarten 215 <input type="checkbox"/> High school or junior high 241 <input type="checkbox"/> College, adult education 311 <input type="checkbox"/> Care facility for the aged 331 <input type="checkbox"/> Hospital 341 <input type="checkbox"/> Clinic, clinic type temporary 342 <input type="checkbox"/> Doctor/dentist office 361 <input type="checkbox"/> Prison or jail, not juvenile 419 <input type="checkbox"/> 1-or 2-family dwelling 429 <input type="checkbox"/> Multi-family dwelling 439 <input type="checkbox"/> Nursing/boarding house 449 <input type="checkbox"/> Commercial hotel or motel 459 <input type="checkbox"/> Residential, leased and care 469 <input type="checkbox"/> Residential, leased and care 519 <input type="checkbox"/> Food and beverage sales 536 <input type="checkbox"/> Food and beverage sales 538 <input type="checkbox"/> Food and beverage sales 546 <input type="checkbox"/> Food and beverage sales 551 <input type="checkbox"/> Food and beverage sales 560 <input type="checkbox"/> Food and beverage sales 561 <input type="checkbox"/> Food and beverage sales 562 <input type="checkbox"/> Food and beverage sales | | 539 <input type="checkbox"/> Household goods, sales, repairs 579 <input type="checkbox"/> Motor vehicle/boat sales/repair 571 <input type="checkbox"/> Gas or service station 599 <input type="checkbox"/> Business office 616 <input type="checkbox"/> Electric generating plant 629 <input type="checkbox"/> Laboratory/science lab 700 <input type="checkbox"/> Manufacturing plant 819 <input type="checkbox"/> Livestock/poultry storage (barn) 882 <input type="checkbox"/> Non-residential parking garage 891 <input type="checkbox"/> Warehouse 901 <input type="checkbox"/> Construction site 904 <input type="checkbox"/> Industrial plant yard Property Use [REDACTED] Residential street, road or [REDACTED] | |

K1 Person/Entity Involved

Local Option

Business name (if applicable)

Area Code

Phone Number

☐ Check this box if you address an incident location. Then skip the above address lines.

Mr., Ms., Mrs. First Name

or

Last Name

Suffix

Number

Prefix

Street or Highway

Street Type

Suffix

Post Office Box

Apt./Suite/Rm

City

State

Zip Code

☐ More people involved: Please check this box and attach Supplemental Form (SRIS-13) as necessary

K2 Other

Local Option

☐ If other persons involved, then check this box and skip the rest of this section.

Business name (if applicable)

Area Code

Phone Number

☐ Check this box if you address an incident location. Then skip the above address lines.

Mr., Ms., Mrs. First Name

or

Last Name

Suffix

Number

Prefix

Street or Highway

Street Type

Suffix

Post Office Box

Apt./Suite/Rm

City

State

Zip Code

L Remarks

Local Option

E-226 dispatched emergency for a vehicle fire. E-226 arrived on the scene to find a late model Ford truck with flames visible, both in the engine and passenger compartment. E-226 deployed an 1 3/4 attack hose to the drivers front corner and donned SCBA and began extinguishing the fire. The fire was knocked down and the passenger compartment inspected finding no other occupants other than the owner that was nearby. E-226 cancelled E-227 and placed them to standby the response area while overhaul continued. No other fire was found and the vehicle was left cold for the wrecker service to remove. E-226 returned to service.

M Authorization

Officer in charge ID

No Staff ID

Signature

Position or rank

Assignment

Month

Day

Year

Check
Box if
you
are
submitting
this
report
in
change.

Officer in charge ID

No Staff ID

Signature

Position or rank

Assignment

Month

Day

Year



☒ STATE FARM FIRE & CASUALTY COMPANY
☐ STATE FARM INDEMNITY COMPANY
☐ STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY
☐ STATE FARM COUNTY MUTUAL INSURANCE COMPANY OF TEXAS

Barcode Only

Claim Number 42-1584-605

AFFIDAVIT OF VEHICLE FIRE (All Questions Must Be Completed in Ink)

1. Name of Insured [REDACTED] Name of Owner [REDACTED]
 Address [REDACTED] Home Phone [REDACTED]
 Date of Birth [REDACTED] Marital Status: ☒ Married ☐ Single No. of Dependents
 Social Security No. [REDACTED] Driver's License No. [REDACTED]
 Occupation RETIRED 1975 Employer's Name
 Address Phone

2. Date of Fire 03-07-2003 Time BETWEEN 2:00 ☐ A.M. ☒ P.M. CREW LAB
 Make of Vehicle FORD Year 2001 Model F150 CREW Body Type PICK-UP Color MAROON
 Vehicle ID # VIN 1F3507W01K License Plate # [REDACTED] State TN
 Certificate of Title # If none, why? LEASED - CUNNINGHAM FORD
 Number of cylinders 8 MAR 17 2003 H.P. or C.I. or Liter Odometer reading 10150?
 Was vehicle locked? ☐ Yes ☒ No Chatterbox Were windows rolled up? ☒ Yes ☐ No
 When did you last see your vehicle? Date 03-07-2003 Time 3:00 P.M. APPROX ☐ A.M. ☒ P.M.
 Specific location where vehicle burned ON SMOKEY HOLE ROAD NEAR 9925 HOUSE (RURAL FORD)
 Reason vehicle was left at this location FIRE CREW CALLED FOR WRECKER SERVICE LEAKS
 Name and address of person who left auto at this location WRECKER SERVICE ON SMOKEY HOLE ROAD
 Their driver's license no.
 When was the fire discovered? Date ON SAME DAY AS LAST SEEN Time 3:00 APPROX ☐ A.M. ☒ P.M.
 Who made the discovery? I did
 When was fire reported to fire department? Date 03-07-2003 Time APPROX 3:00 ☐ A.M. ☒ P.M.
 Name and Location of Fire Station RURAL FORD FIRE ON SMOKEY HOLE ROAD
 Describe fire (where, color of smoke, cause): When I stopped and looked, black smoke came out of engine bay
yes, when I first saw a brown spot appeared on hood and got larger & stopped.
 Was vehicle being driven? ☒ Yes ☐ No Describe exactly what happened prior to noticing smoke
 or fire (electrical or mechanical malfunction): ? I drove past water pump & fan lines - not done
 Were you carrying a container of flammable liquid in the vehicle at the time of fire? ☐ Yes ☒ No

If yes, give type of liquid _____, amount _____, size and
type of container _____, location of container at time of fire _____

Did you smell smoke or see flames first? Smoke

Have you had similar problems prior to fire? ☒ Yes ☒ No If yes, explain ERROR

Has vehicle been damaged during the past three years? ☐ Yes ☒ No If so, give location _____

_____, type of damage _____, amount of damage \$ _____, and date _____

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

Who made the repairs? _____

Name and address of insurance company who paid claim damages, if any: _____

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

Any other vehicles in your household? ☒ Yes ☐ No MOTOR HOME SIDE: STATE FARM INS. PAID

Name of insurance company and agent on other vehicles STATE FARM - JACQUE TOWNSEND AGENT

Your prior insurance company and agent TOO LONG TO REMEMBER

Any homeowners claims within the past 6 months with State Farm? ☐ Yes ☒ No

With any other carrier? NO

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

| | | | | | |
|---|---|---|--|--|---|
| <input type="checkbox"/> Radio AM | <input checked="" type="checkbox"/> Power Steer | <input type="checkbox"/> Vinyl Roof | <input checked="" type="checkbox"/> Cruise Control | Tires | Transmission: |
| <input checked="" type="checkbox"/> AM/FM | <input checked="" type="checkbox"/> Power Brakes | <input checked="" type="checkbox"/> Tinted Glass | <input checked="" type="checkbox"/> Compact Disc | <input type="checkbox"/> W/W | <input checked="" type="checkbox"/> Automatic |
| <input checked="" type="checkbox"/> Stereo | <input checked="" type="checkbox"/> Power Locks | <input checked="" type="checkbox"/> Mag Wheels | <input checked="" type="checkbox"/> Sun/Moon Roof | <input checked="" type="checkbox"/> Radial | <input type="checkbox"/> Standard |
| <input checked="" type="checkbox"/> Tape Deck | <input checked="" type="checkbox"/> Power Windows | <input type="checkbox"/> T-Tops | | <input type="checkbox"/> Special | <input type="checkbox"/> Console |
| <input checked="" type="checkbox"/> Air Cond. | <input checked="" type="checkbox"/> Power Seats | <input checked="" type="checkbox"/> Tilt Steering Wheel | | | <input type="checkbox"/> AutoStick |

☐ Other: Anti-Lock Brakes

☐ CB Radio Type _____ Cost \$ _____ Date Installed _____

☐ Purchased From: LANCE CUNNINGHAM FORD

4. Vehicle Condition

Paint ☐ Fair ☐ Good ☒ Excellent

Transmission ☐ Fair ☐ Good ☒ Excellent

Engine ☐ Fair ☐ Good ☒ Excellent

Body ☐ Fair ☐ Good ☒ Excellent

Other distinguishing features: (Dents, decals
trailer hitch, interior, etc).

Two dents under 25¢ sign

Engine used: Isuzu 4100

everything excellent on interior

5. Name and address of service station/garage: Myself and CUNNINGHAM FORD Co

Who performs routine maintenance service? Lance Cunningham Date last serviced 2600 Miles Ago

Who performs State MV inspection? _____

Date last inspected _____

6. Date car purchased LEASED APRIL 2001 ☒ New ☐ Used Purchase Price \$ 1000⁰⁰ Cash \$497.74

Trade-in NA Allowance _____

Seller Dealer/Individual Name and Address Sam Cunningham Ford

How did you learn the car was for sale? _____

How was the car paid for? ☐ Cash ☐ Check LEASED

If financed, name and address of finance company FORD MOTOR COMPANY

Account # _____ Balance Due \$ _____ Loan Terms _____ Months _____

Is account past due? ☐ Yes ☒ No How Long? _____

Are keys in your possession? ☐ Yes ☐ No Ignition key # IN SWITCH Trunk key # P.U.

Do you have other theft insurance? ☐ Yes ☒ No Policy# _____

Name of insurance company STATE FARM INSURANCE CO.

Was this a rebuilt wreck? ☐ Yes ☒ No If yes, name of rebuilder _____

Was it a recovered theft? ☐ Yes ☒ No If yes, date of theft _____

7. Amount for which you are making claim \$ ALL

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

It is a crime to knowingly provide false, incomplete or misleading information to an insurance company for the purpose of defrauding the company. Penalties include imprisonment, fines and denial of insurance benefits.

Witness _____

Policyholder _____

(signature) (line)

Address _____

SUBSCRIBED AND SWORN TO BEFORE ME this 13th day of MARCH (year) 2003

in Knoxville Knox County, Tennessee

Notary Public Daphne M. Day My commission expires: Dec. 4, 2006

To whom it may concern

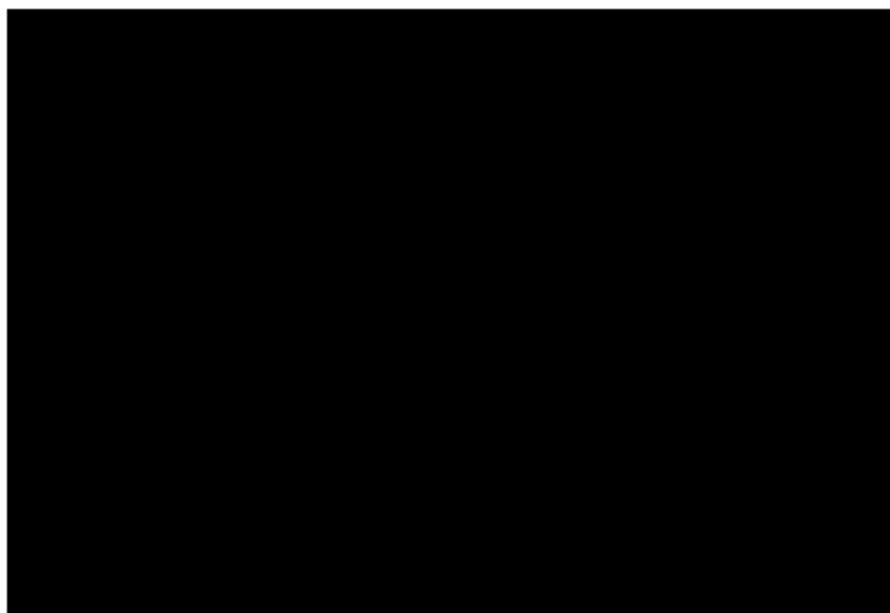
This is a history of the Ford F150 with a super crew cab leased by me, [REDACTED]
[REDACTED] Knoxville, TN. [REDACTED] Phone [REDACTED] from Lance
Cunningham Ford Co on March 29, 2001 with a down payment of \$1000.00 and a
monthly payment of \$497.42.

After using this P.U. for several months, I discovered that it was using more gasoline than
than it should, I checked the miles per gallon that I was getting and after several checks I
found that I was getting eight to ten miles per gallon, so I took the P.U. back to
Cunningham Ford place. I took P.U. to have the oil, etc. changed, and was told that they
could not find out any problems. Later when they were correcting a Recall, I was told that
they could not find anything to cause the P.U. to use so much fuel. Later I called
Cunningham Ford Co. and was told the company would try to correct the problem.

I drove this Pick-Up for approximately 10,150 miles, and on 03-07-2003 it caught on fire
and burned up, totaled. I was driving this vehicle, and I noticed a brown spot that
appeared to be getting larger, so I stopped to check out the problem and discovered that
black smoke was coming out both sides of the engine compartment and decided that the
P.U. was on fire. I ran to the next house and asked the lady to call the Fire Department
which she did and we both went toward the Pick Up and by this time the P.U. was flaming
Because of fear of an explosion we did not get any closer to the burning vehicle. By the
time the fire crew arrived at P.U. it had burned back to the P.U. bed.

Bowden H. Atkins

Bowden H. Atkins



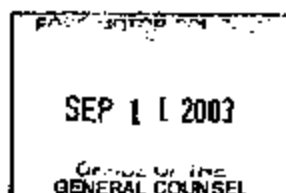
September 3, 2003

Attention: Vincent D Kirksey
Ford Motor Company
P O Box 6248 MD 3NE-B
Dearborn Michigan 48126

RECEIVED SEP 11 2003

New

RE: Our Insured: [REDACTED]
Our Claim Number: [REDACTED]
Our Insured Driver: [REDACTED]
Accident Date: 07/22/2003
Location of Accident: Holmdel NJ
Amount of Claim: \$17,112.50
Your Insured:
Your Claim/Policy No: Vin# 1FTZX17261N [REDACTED]



Dear Mr. Kirksey:

This is to inform you that New Jersey Manufacturers Insurance Company is exercising its right of subrogation regarding the claim referenced above.

We would appreciate your prompt consideration of this because an expeditious settlement will benefit all parties involved.

Please contact me to discuss the damages or liability resulting from this accident.

Thank you for your anticipated cooperation.

Very truly yours,

Beverly Hicks
Beverly Hicks X5575
SUBROGATION CLAIMS REPRESENTATIVE

Handwritten notes:
- \$17,112.50
- VIN
- 7/22/03
- 101 F-150
- 20,750
- \$16,612.50
Stamp: 20:12 6-23 SEP-9 P1:02
Stamp: CONSUMER AFFAIRS SECTION

NEW JERSEY STATE POLICE

Time E

Operations Report

| | | | | | | | |
|--|-----------------------------------|----------------------------------|------------------------------|--------------------------------|---------------------------------|---|--------------|
| 1 STATION <u>Holmdel</u> | | 2 CODE <u>E050</u> | | 3 CASE NUMBER <u>7-98R</u> | | 4 DATE OF INCIDENT <u>7/22/03</u> | |
| 5 INCIDENT <u>Car Fire</u> | | | | 6 TIME <u>001</u> | 7 DAY OF WEEK <u>Tuesday</u> | 8 MILEPOST NO. <u>1145</u> | |
| 9 VEH. TRAVELLING <input checked="" type="checkbox"/> HWY <input type="checkbox"/> SR | 10 MUNICIPALITY <u>Holmdel</u> | | 11 COUNTY <u>Monmouth</u> | | 12 OVERPASS - NAME M.P. NO. | | |
| 13 OTHER LOCATION <u>Oster Roadway</u> | | 14 MAKE OF VEH. <u>Ford</u> | | 15 YR. <u>01</u> | 16 BODY TYPE <u>PKUP</u> | 17 REGISTRATION <u>1ET2X1726IN</u> | |
| 18 OPERATOR'S - VICTIMS - ACCUSED NAME (FIRST - MIDDLE - LAST) <u>Craig S. Sparks</u> | | | | | | | |
| 20 OPERATOR'S <u>[REDACTED]</u> STREET - MUNICIPALITY - STATE <u>NT</u> | | | | | | | |
| 21 DATE OF BIRTH | 22 AGE | 23 SEX | 24 RACE | 25 HEIGHT | 26 WEIGHT | 27 HAIR | 28 EYES |
| [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | <u>Brown</u> | <u>Green</u> |
| 29 COMPLEXION <u>Fair</u> | | | | | | 30 SOCIAL SEC. NO. <u>[REDACTED]</u> | |
| 31 OWNER'S NAME (FIRST - MIDDLE - LAST) <u>S/A/A</u> | | | | | | | |
| 32 OWNER'S ADDRESS (NUMBER - STREET - MUNICIPALITY - STATE) | | | | | | | |
| 33 NARRATIVE | | | | | | | |
| <p><u>July 22, 2003 Tuesday</u></p> <p><u>On the above date I was detailed to the above location</u> <u>reference a car fire.</u></p> <p><u>Upon arrival the vehicle, a red 2001 Ford F150 pickup bearing</u> <u>NT registration [REDACTED] was fully engulfed. I spoke to the owner/operator</u> <u>[REDACTED] he advised he was traveling north on the G.S. Parkway</u> <u>when he observed flames coming out of the bottom dashboard. He pulled</u> <u>over and contacted the police. The truck went into flames. Holmdel FD engine</u> <u>509 responded and extinguished the fire. Service ticket #20699 was issued.</u> <u>Holmdel FAS also responded. Service ticket #20700 was issued. No injuries</u> <u>were reported at the scene. The vehicle was removed by Bill Wright's</u> <u>towing company, Keyport, NJ. The fire appeared to be electrical and no suspicious</u> <u>in nature. No further S.P. action taken.</u></p> | | | | | | | |
| <p><u>Detailed 12:04 PM</u></p> <p><u>Arrived 12:16 PM</u></p> <p><u>Completed 12:44 PM</u></p> | | | | | | | |
| 34 STATUS <input type="checkbox"/> PENDING <input checked="" type="checkbox"/> COMPLETED | | | | 35 PAGE 1 OF 1 PAGES | | | |
| 36 DATE OF REPORT <u>7/22/03</u> | | 37 NAME <u>P. T. A. V. A.</u> | | 38 BADGE NUMBER <u>5539</u> | | 39 STATION <u>[REDACTED]</u> | |
| 40 TROOP <u>[REDACTED]</u> | | | | | | | |

Robert M. Silverman, Esquire
Jacqueline M. Herritt, Esquire
KIMMEL & SILVERMAN, P.C.
89 Haddon Avenue North
Haddonfield, NJ 08033
(856)429-8334

205
542
4705
ATTORNEYS FOR PLAINTIFF
or Cash

0. Payer
e. Check Payer Relationship to Case:

P (Plaintiff) THIS IS AN ARBITRATION
D (Defendant) MATTER. ASSESSMENT OF
PA (Plaintiff's Attorney) DAMAGES HEARING IS
DA (Defendant's Attorney) REQUESTED.

O Other SUPERIOR COURT OF NEW JERSEY
MONMOUTH COUNTY

f. Overpayment Amount to Applicant:

Hazlet, NJ

FORD MOTOR COMPANY
C/O CT Corporation
820 Bear Tavern Road, Suite 350
West Trenton, NJ 08628

CIVIL ACTION

NO. C-4092-02

FILED

AUG

RECEIVED

AUG 5 2002

OFFICE OF THE CLERK, SUPERIOR COURT CLERK
BY WILLIAM W. CARPENTER, DEPUTY CLERK
MONMOUTH COUNTY

COMPLAINT

1. Plaintiff, [REDACTED] is an adult individual citizen and legal resident of the State of New Jersey, [REDACTED] Hazlet, NJ [REDACTED]

2. Defendant, Ford Motor Company, is a business corporation qualified to do business and regularly conducts business in the State of New Jersey, with its legal residence and principal place of business located at 300 Renaissance Center, P.O. Box 43301, Detroit, MI 48243, and can be served at c/o CT Corporation, 820 Bear Tavern Road, Suite 350, West Trenton, NJ 08628.

BACKGROUND

3. On or about August 28, 2001, Plaintiff leased a new 2001, Ford, F150, manufactured and warranted by Defendant, bearing the Vehicle Identification Number 1FTZX17261N [REDACTED]

4. The vehicle was leased in the State of New Jersey and is registered in the State of New Jersey.

5. The lease price of the vehicle, including registration charges, document fees, sales tax, finance and bank charges, but excluding other collateral charges not specified, yet defined by the

Robert M. Silverman, Esquire
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89 Haddon Avenue North
Haddonfield, NJ 08033
(856)429-8334

ATTORNEYS FOR PLAINTIFF

THIS IS AN ARBITRATION
MATTER. ASSESSMENT OF
DAMAGES HEARING IS
REQUESTED.

[REDACTED]
Hazlet, N.J.

SUPERIOR COURT OF NEW JERSEY
MONMOUTH COUNTY

v.

CIVIL ACTION

FORD MOTOR COMPANY
C/O CT Corporation
820 Bear Tavern Road, Suite 350
West Trenton, NJ 08628

NO.

COMPLAINT

1. Plaintiff, [REDACTED], is an adult individual citizen and legal resident of the State of New Jersey, [REDACTED], Hazlet, N.J. [REDACTED]

2. Defendant, Ford Motor Company, is a business corporation qualified to do business and regularly conducts business in the State of New Jersey, with its legal residence and principal place of business located at 300 Renaissance Center, P.O. Box 43301, Detroit, MI 48243, and can be served at c/o CT Corporation, 820 Bear Tavern Road, Suite 350, West Trenton, NJ 08628.

BACKGROUND

3. On or about August 28, 2001, Plaintiff leased a new 2001, Ford, F150, manufactured and warranted by Defendant, bearing the Vehicle Identification Number 1FTZX17261N [REDACTED]

4. The vehicle was leased in the State of New Jersey and is registered in the State of New Jersey.

5. The lease price of the vehicle, including registration charges, document fees, sales tax, finance and bank charges, but excluding other collateral charges not specified, yet defined by the

Lemon Law, totaled more than \$28,772.80. A true and correct copy of the contract is attached hereto, made a part hereof, and marked Exhibit "A".

6. In consideration for the purchase of said vehicle, Defendant issued to Plaintiff several warranties, guarantees, affirmations or undertakings with respect to the material or workmanship of the vehicle and/or remedial action in the event the vehicle fails to meet the promised specifications.

7. The above-referenced warranties, guarantees, affirmations or undertakings are/were part of the basis of the bargain between Defendant and Plaintiff.

8. The parties' bargain includes an express 3-year / 36,000 mile warranty, as well as other guarantees, affirmations and undertakings as stated in Defendant's warranty materials and owner's manual.

9. However, as a result of the ineffective repair attempts made by Defendant through its authorized dealer(s), the vehicle is rendered substantially impaired, unable to be utilized for its intended purposes, and is worthless to Plaintiff.

10. Plaintiff has or may have resorted to Defendant's informal dispute settlement procedure, to the extent said procedure complies with 16 CFR 703.

11. Plaintiff avers that the Federal Trade Commission (FTC) has determined that no automobile manufacturer complies with 16 CFR 703. See, Fed. Reg. 15636, Vol. 62, No. 63 (Apr. 2, 1997)

COUNT I
NEW JERSEY MOTOR VEHICLE WARRANTY ACT

12. Plaintiff hereby incorporates all facts and allegations set forth in this Complaint by reference as if fully set forth at length herein.

13. Plaintiff is a "Purchaser" as defined by N.J.S.A. 56:12-30.

14. Defendant is a "Manufacturer" as defined by N.J.S.A. 56:12-30.

15. Dayton Ford, is and/or was at the time of sale a "Dealer or Motor Vehicle Dealer" in the business of buying, selling, and/or exchanging vehicles as defined by N.J.S.A. 56:12-30.

16. On or about August 28, 2001, Plaintiff took possession of the above mentioned vehicle and experienced nonconformities as defined by N.J.S.A. 56:12-29 et seq., which substantially impair the use, value and/or safety of the vehicle.

17. Defendant through its authorized dealer failed to provide written notification that the vehicle was covered by the New Jersey Motor Vehicle Warranty Act as provided in N.J.S.A. 56:12-34(c). Plaintiff believes and therefore avers said failure is a per se violation of the New Jersey Consumer Fraud Act, N.J.S.A. 56:8-1 et seq., as well as a violation of the New Jersey Motor Vehicle Warranty Act.

18. The nonconformities described violate the express written warranties issued to Plaintiff by Defendant.

19. Section 56:12-32 of the New Jersey Motor Vehicle Warranty Act provides:

- a. If, during the period specified in section 3 of this act, the manufacturer or its dealer is unable to repair or correct a nonconformity within a reasonable time, the manufacturer shall accept return of the motor vehicle from the consumer. The manufacturer shall provide the consumer with a full refund of the purchase price of the original motor vehicle including any stated credit or allowance for the consumer's used motor vehicle, the cost of any options or other modifications arranged, installed, or made by the manufacturer or its dealer within 30 days after the date of original delivery, and any other charges or fees including, but not limited to, sales tax, license and registration fees, finance charges, reimbursement for towing and reimbursement for actual expenses incurred by the consumer for the rental of a motor vehicle equivalent to the consumer's motor vehicle and limited to the period during which the consumer's motor vehicle was out of service due to a nonconformity, less a reasonable allowance for vehicle use.

20. Section 56:12-33 of the New Jersey Motor Vehicle Warranty Act provides a presumption of a reasonable number of repair attempts:

- a. It is presumed that a manufacturer or its dealer is unable to repair or correct a nonconformity within a reasonable time if, within the first 18,000 miles of operation or during the period of two years following the date of original delivery of the motor vehicle to a consumer, whichever is the earlier date:
 - (1) Substantially the same nonconformity has been subject to repair three or more times by the manufacturer or its dealer and the nonconformity continues to exist; or
 - (2) The motor vehicle is out of service by reason of repair for one or more nonconformities for a cumulative total of 20 or more calendar days since the original delivery of the motor vehicle and a nonconformity continues to exist.
- b. The presumption contained in sub-section a. of this section shall apply against a manufacturer only if the manufacturer has received written notification, by or on behalf of the consumer, by certified mail

return receipt requested, of a potential claim pursuant to the provisions of this act and has had one opportunity to repair or correct the defect or condition within 10 calendar days following receipt of the notification. Notification by the consumer shall take place any time after the motor vehicle has had substantially the same nonconformity subject to repair two or more times or has been out of service by reason of repair for a cumulative total of 20 or more calendar days.

21. Plaintiff has satisfied the above definition as the vehicle has been subject to repair more than three (3) times for the same nonconformity, and the nonconformity remained uncorrected.

22. In addition, the above vehicle has or will be out of service by reason of the nonconformities complained of for a cumulative total of twenty (20) or more calendar days.

23. Plaintiff has delivered the nonconforming vehicle to an authorized service and repair facility of the Defendant on numerous occasions as outlined below.

24. After a reasonable number of attempts, Defendant was unable to repair the nonconformities.

25. During the first 18 months and/or 24,000 miles, Plaintiff complained on at least three (3) occasions about defects and or non-conformities to the following vehicle components: catalytic converter, fuel injection, front end, rattle under vehicle, front wheel makes knocking sound, runs sluggish, stalls, sputters, backfires and engine runs rough. True and correct copies of all invoices in Plaintiff possession are attached hereto, made a part hereof, and marked Exhibit "B".

26. Plaintiff has been and will continue to be financially damaged due to Defendant's intentional, reckless, wanton, and negligent failure to comply with the provisions of N.J.S.A. 56:12-29 et seq.

27. Plaintiff has provided Defendant with a final repair opportunity prior to filing the within Complaint.

28. Pursuant to N.J.S.A. 56:12-29 et seq., Plaintiff seeks relief for losses due to the nonconformities and defects in the above-mentioned vehicle in addition to reasonable attorney fees and all court costs.

WHEREFORE, Plaintiff respectfully demands judgment against Defendant in an amount equal to the price of the subject vehicle, plus all collateral charges, attorneys' fees, and court costs.

COUNT II
MAGNUSON-MOSS (FTC) WARRANTY IMPROVEMENT ACT

29. Plaintiff hereby incorporates all facts and allegations set forth in this Complaint by reference as if fully set forth at length herein.

30. Plaintiff is a "Consumer" as defined by 15 U.S.C. §2301(3).

31. Defendant is a "supplier", "warrantor", and a "service contractor" as defined by 15 U.S.C. § 2301 (4),(5) and (8).

32. The subject vehicle is a "consumer product" as defined by 15 U.S.C. § 2301(1).

33. By the terms of its written warranties, affirmations, promises, or service contracts, Defendant agreed to perform effective repairs at no charge for parts and/or labor.

34. The Magnuson-Moss Warranty Improvement Act requires Defendant to be bound by all warranties implied by state law. Said warranties are imposed on all transactions in the state in which the vehicle was delivered.

35. Defendant has made attempts on several occasions to comply with the terms of its express warranties; however, such repair attempts have been ineffective.

36. The Magnuson-Moss Warranty Improvement Act, 15 U.S.C. §2310(d)(2) provides:

If a consumer finally prevails on an action brought under paragraph (1) of this subsection, he may be allowed by the court to recover as part of the judgment a sum equal to the amount of aggregate amount of costs and expenses (including attorney fees based upon actual time expended), determined by the court to have been reasonably incurred by the Plaintiff for, or in connection with the commencement and prosecution of such action, unless the court, in its discretion shall determine that such an award of attorney's fees would be inappropriate.

37. Plaintiff has afforded Defendant a reasonable number of opportunities to conform the vehicle to the aforementioned express warranties, implied warranties and contracts.

38. As a direct and proximate result of Defendant's failure to comply with the express written warranties, Plaintiff has suffered damages and, in accordance with 15 U.S.C. §2310(d)(1), Plaintiff is entitled to bring suit for such damages and other legal and equitable relief.

39. Defendant's failure is a breach of Defendant's contractual and statutory obligations constituting a violation of the Magnuson-Moss Warranty Improvement Act, including but not limited to: breach of express warranties; breach of implied warranty of merchantability; breach of implied warranty of fitness for a particular purpose; breach of contract; and constitutes an Unfair Trade Practice.

40. Plaintiff avers Defendant's Dispute Resolution Program is not in compliance with 16 CFR 703 by the FTC for the period of time this claim was submitted.

41. Plaintiff avers that upon successfully prevailing upon the Magnuson-Moss claim herein, all attorney fees are recoverable and are demanded against Defendant.

WHEREFORE, Plaintiff respectfully demands judgment against Defendant in an amount equal to the price of the subject vehicle, plus all collateral charges, incidental and consequential damages, reasonable attorneys' fees, and all court costs.

COUNT III

UNIFORM COMMERCIAL CODE

42. Plaintiff hereby incorporates all facts and allegations set forth in this Complaint by reference as if fully set forth at length herein.

43. The defects and nonconformities existing within the vehicle constitute a breach of contractual and statutory obligations of Defendant, including but not limited to the following:

- a. Express Warranty;
- b. Implied Warranty Of merchantability; and
- c. Implied Warranty Of Fitness For A Particular Purpose.

44. At the time of obtaining possession of the vehicle and at all times subsequent thereto, Plaintiff has justifiably relied upon Defendant's express warranties and implied warranties of fitness for a particular purpose and implied warranties of merchantability.

45. At the time of obtaining possession of the vehicle and at all times subsequent thereto, Defendant was aware Plaintiff was relying upon Defendant's express and implied warranties, obligations, and representations with regard to the subject vehicle.

46. Plaintiff has incurred damages as a direct and proximate result of the breach and failure of Defendant to honor its express and implied warranties.

47. Such damages include, but are not limited to, the contract price of the vehicle plus all collateral charges, including attorney fees and costs, as well as other expenses, the full extent of which are not yet known.

WHEREFORE, Plaintiff respectfully demands judgment against Defendant in an amount equal to the contract price of the vehicle, plus all collateral charges and attorneys' fees.

COUNT IV
NEW JERSEY CONSUMER FRAUD ACT

48. Plaintiff hereby incorporates all facts and allegations set forth in this Complaint by reference as if fully set forth at length herein.

49. Plaintiff is a "Person" as defined by N.J.S.A. 56:8-1(d).

50. Defendant is a "Person" as defined by N.J.S.A. 56:8-1(d).

51. Defendant's actions surrounding the sale and servicing of the subject vehicle were unconscionable. Defendant's agents also acted with a reckless and callous disregard for Plaintiff's rights in negotiating and handling Plaintiff's warranty claims.

52. Defendant's actions surrounding the sale and servicing of said vehicle constitute a unconscionable commercial practice, deception, fraud, false pretense, false promise, and/or misrepresentation. Defendant and its agents acted affirmatively in such a manner as to be an unlawful commercial practice.

53. Defendant acted knowingly with the intent to cause Plaintiff's reliance thereupon.

54. Defendant knowingly concealed, suppressed, or omitted facts material to the transactions at issue, in that Defendant was aware the defect(s)/condition(s) could not be repaired, and that the ineffectual repairs were performed by incompetent or unqualified individuals. Defendant's failure to verify the defect(s) or condition(s) constitutes a refusal to perform the repairs under its statutory or contractual obligations.

55. Defendant through its authorized dealer failed to provide written notification that the vehicle was covered by the New Jersey Motor Vehicle Warranty Act N.J.S.A. 56:12-34(c) and Plaintiff believes and therefore avers said failure is a per se violation of the New Jersey Consumer Fraud Act N.J.S.A. 56:8-1 et seq. as well as a violation of the New Jersey Motor Vehicle Warranty Act.

56. Plaintiff believes and therefore avers that the defect(s) or condition(s) outlined previously is/are an inherent design defect and that as such the Defendant must certify the existence of this defect or condition to the Division of Consumer Affairs. Defendant has failed to file this certification and this failure is a violation of the New Jersey Consumer Fraud Act N.J.S.A. 56:8-1 et seq.

57. Defendant's failure to supply an itemized legible statement of repair is an unlawful practice pursuant to the New Jersey Consumer Fraud Act N.J.S.A. 56:8-2.

58. The Act prohibits the aforementioned action of Defendant in the sale and attempted repair of the subject vehicle.

59. Plaintiff believes and therefore avers the reckless, wanton and willful failure of Defendant to comply with the terms of the written warranties constitutes an unfair method of competition.

60. As a result of Defendant's unlawful conduct, Plaintiff has and will continue to suffer ascertainable financial loss proximately caused by the Defendant's conduct. Said losses are outlined as follows:

- a. Plaintiff is entitled to a full refund N.J.S.A. 56:8-2.11-12;
- b. Plaintiff's vehicle, given the defect/condition, is worthless;
- c. Plaintiff lost time from work and other money as a result of having to take the vehicle in for the repeated repair attempts;
- d. Plaintiff has been relegated to finding alternative means of transportation while the vehicle was in for repairs and while the vehicle has been in its present condition. As a result, Plaintiff has incurred additional transportation costs; and
- e. Plaintiff has expended sums to maintain, store, insure, register, and other expenses for transportation.

WHEREFORE, Plaintiff respectfully demands judgment against Defendant for compensatory damages, treble damages, attorney fees, costs of suit, and any further relief as the Court may deem just and proper.

KIMMEL & SILVERMAN, P.C.

By: _____

ROBERT M. SILVERMAN, ESQUIRE

Attorney for Plaintiff
89 Haddon Avenue North
Haddonfield, NJ 08033
(856) 429-8334

JURY-DEMAND

Plaintiff hereby demands a trial by jury as to all the issues

KIMMEL & SILVERMAN, P.C.

By: _____

ROBERT M. SILVERMAN, ESQUIRE
Attorney for Plaintiff

CERTIFICATION PURSUANT TO R.4:15-1

Upon knowledge and belief I hereby certify that there are no other actions or arbitrations related to this suit pending or presently contemplated.

KIMMEL & SILVERMAN, P.C.

By: _____

ROBERT M. SILVERMAN, ESQUIRE
Attorney for Plaintiff

CERTIFICATION OF NOTICE

Pursuant to N.J.S.A. 56:8-20 Plaintiff is mailing a copy of this Complaint to the Office of the Attorney General, Richard J. Hughes Justice Complex, 25 West Market Street in the City of Trenton, County of Mercer, in the state of New Jersey on July 31 2002

KIMMEL & SILVERMAN, P.C.

By: 

ROBERT M. SILVERMAN, ESQUIRE
Attorney for Plaintiff

Action Detail

| | | | |
|---|---------------------------|-------------------------|-----------------|
| VIN: 1FTZX17281 | Year: 2001 | Model: F-SERIES | Case: 532821332 |
| Name: | Owner Status: Original | WSD: | |
| Symptom Desc: EXHAUST SYSTEM ATTACHMENT CATALYTIC CONVT | | Primary Phone: | |
| Reason Desc: LEGAL - OTHER ATTORNEY DEMAND | | Secondary Phone: | |
| Issue Type: 07 LEGAL | Issue Status: CLOSED | Dealer: DAYTON FORD INC | |
| Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION | | P & A Code: 20558 | |
| Action Desc: OPEN LEGAL CONTACT - ATTORNEY DEMAND | | | |
| Odometer: 11064 MI | Comm Type: FAX | | |
| Action Date: 05/15/2002 | Action Time: 10:09:48:840 | Action Date: Yes | |
| Analyst Name: Molly Kelsey (MKELSEY2) | Analyst: MKELSEY2 | | |

COMMENTS: *****ATTORNEY DEMAND LETTER***** REC'D 05/15/02 ATTORNEY ALLEGES DEFECTIVE VEHICLE. ATTORNEY ALLEGES HIS CLIENT'S VEHICLE IS DEFECTIVE. "ATTORNEY DEMANDS FORD REPURCHASE HIS CLIENT'S VEHICLE."

Action Detail

| | | | |
|--|---------------------------|-----------------------------|-----------------|
| VIN: 1F7ZK17281 | Year: 2001 | Model: F-SERIES | Case: 532821332 |
| Name: [REDACTED] | Owner Status: Original | WSD: | |
| Symptom Desc: EXHAUST SYSTEM ATTACHMENT CATALYTIC CONV | | Primary Phone: [REDACTED] | |
| Reason Desc: LEGAL - OTHER ATTORNEY DEMAND | | Secondary Phone: [REDACTED] | |
| Issue Type: 07 LEGAL | Issue Status: CLOSED | Dealer: DAYTON FORD INC | |
| Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION | | F & A Code: 20559 | |
| Action Desc: FINAL CASE DISPOSITION | | | |
| Odometer: 11064 MI | Comm Type: FAX | | |
| Action Date: 08/12/2002 | Action Time: 15:24:06:417 | Action Date: No | |
| Analyst Name: MICHELLE HULL | Analyst: 9835MH | | |

COMMENTS: ATTORNEY ADVISED FORD WILL NOT REPURCHASE THE CUSTOMER'S VEHICLE. THE DEALERSHIP WILL INSPECT/ADDRESS ANY CONCERNS THAT CURRENTLY EXIST WITH THE VEHICLE. LETTER SENT ON 6/1/2002.

DNB-602-101-1674

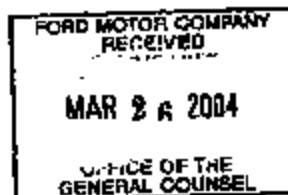


PROGRESSIVE

P.O. Box 29440
Cleveland, OH 44101
Telephone: 877-818-0138
Facsimile: 440-603-6369
progressive.com

March 23, 2004

Ford Motor Company
Office of General Counsel
Parklane Towers West, Suite 300
3 Parklane Blvd.
Dearborn, MI 48126-2568



Re: Product Defect
VIN: 1FMRU15W11L [REDACTED]
Year: 2001
Make: Ford
Model: Expedition SW
Our Insured: [REDACTED]
Address: [REDACTED] Miami, FL [REDACTED]
Phone No.: [REDACTED] Home: [REDACTED] Work: [REDACTED]
Our Claim No: [REDACTED]
Date of Loss: 9-28-03
Damages: \$25,394.27

Please accept this letter as formal notice of our subrogation rights in regard to the above-captioned claim. Demand is hereby made upon you for payment of [REDACTED] damages and those of [REDACTED] insured.

Our investigation indicates damages to our insured's vehicle was a direct result of a manufacturer's defect or negligence on your behalf. Enclosed please find all supporting documentation.

Please acknowledge receipt of my subrogation demand and forward your payment of \$25,394.27 to my attention, payable to [REDACTED] Insurance Co., as subrogee of [REDACTED], and mail to my attention [REDACTED] Richmond Hts., OH [REDACTED]

You can contact me at the number listed below should you need additional documentation or care to discuss this claim.

Thank you for your anticipated cooperation.

Progressive Southeastern Insurance Co.

William P. Kienzi
Subrogation Representative
(440) 603-5339

Enclosures

10/9 ped
VIN
9/28/03
\$25,394.27
\$65,000 (M)

EX-1003-101-1679

WARD & WHITEMORE
UNIVERSAL FIRE CONSULTANTS, INC.

WARD & WHITEMORE
UNIVERSAL FIRE CONSULTANTS, INC.

Boca Raton
P.O. Box 880782
Boca Raton, FL 33488
861-470-1304
FAX 861-479-4108

Cincinnati
P.O. Box 11293
Cincinnati, OH 45211
513-867-8899
FAX 513-481-1786

Dallas
P.O. Box 3102
Grapevine, TX 76066
817-329-6262
FAX 817-421-4802

Jacksonville
P.O. Box 16487
Jacksonville, FL 32248
904-223-2228
FAX 904-223-2219

Miami
P.O. Box 211116
MIA, FL 33421-1116
861-783-7078
FAX 861-783-7078

Minneapolis
P.O. Box 648
Prior Lake, MN 55372
952-461-7000
FAX 952-461-7100

Fort Charlotte
P.O. Box 488072
Fort Charlotte, FL 33848
941-824-8001
FAX 941-824-3832

Tallahassee
P.O. Box 1146
Monticello, FL 32346
850-897-3336
FAX 850-897-4455

Winter Haven
P.O. Box 9223
Winter Haven, FL 33883
888-328-5434
FAX 888-328-6285

November 24, 2003

Ms. Jackie Sostre
Progressive Insurance Company
8200 NW 33rd Street, Suite #100
Miami, FL 33122

Re: [REDACTED]
2001 Ford Expedition, VIN #1FMRU15W11[REDACTED]
Sadisco Auto Salvage [REDACTED]
Miami, Florida
Date of Loss: September 28, 2003
Claim [REDACTED]
W&W File #03-SF451

Dear Ms. Sostre:

On October 17, 2003, Ward & Whitmore Universal Fire Consultants, Inc. was retained by Progressive Insurance Company for the purpose of conducting an investigation to determine, if possible, the origin and cause of a fire that occurred in a 2001 Ford Expedition owned by [REDACTED] Miami, Florida. On October 23, 2003, I traveled to Sadisco, [REDACTED] NW [REDACTED] Florida and initiated my investigation into this matter.

BACKGROUND INFORMATION

This vehicle is a 2001 Ford Expedition XLT with a Triton V-8 engine reflecting vehicle identification number (VIN) 1FMRU15W11[REDACTED]. The vehicle did not contain a license plate or ignition key during this examination.

According to the insured, [REDACTED] he purchased the new vehicle in February 2001. There was approximately 65K miles on the

[REDACTED]
Loss Reporting Hotline: 1-877-352-3473

ENR-005-LG1-1877

Progressive Insurance Company

Re: [REDACTED]

2001 Ford Expedition, VIN #1FMRU16W11 [REDACTED]

Sadisco Auto Salvage, [REDACTED]

Miami, Florida

Date of Loss: September 28, 2003

Claim [REDACTED]

W&W File #03-SF451

Page 2

vehicle when the fire occurred. He was driving home from work, for approximately 10 minutes, when the vehicle behind him began blowing their horn because they observed smoke coming from [REDACTED] vehicle. [REDACTED] then observed smoke coming from below the passenger side of the dash and heard a "poof" sound. He pulled the vehicle to the side of the road and shut-off the ignition. The air conditioner was operating when the fire occurred. He opened the engine hood and observed smoke but no flames. The fire department arrived and because there was no fire they left the scene. Soon after the fire department departed, [REDACTED] observed smoke coming from the rear of the engine compartment and discharged a fire extinguisher into the engine compartment. [REDACTED] cut the positive cable at the battery to prevent another fire.

[REDACTED] stated that he had experienced problems with the air conditioner compressor prior to the fire. The compressor froze and was replaced under warranty by the dealership. [REDACTED] stated that he provided a copy of the invoice to Progressive Insurance Company.

ANALYSIS

Examination of the exterior of the vehicle revealed the only damage observed was some melting at both ends of the plastic vent below the windshield. There was no other damage to the vehicle.

Examination of the passenger compartment revealed there was no visible fire damage within this compartment. The dual air conditioning controls were in the "on" position during this examination. Examination of the fuse panel below the steering column revealed no fuses were blown.

Examination of the engine compartment revealed that fire damage was present at the upper portion of the engine toward the bulkhead. Examination of the fuses in the power distribution box in this compartment revealed only two fuses were blown; a 10-ampere fuse in fuse location #19, which protected the Trailer Tow Stop and Right Turn

Progressive Insurance Company

Re: [REDACTED]

2001 Ford Expedition, VIN #1FMRU15W11L [REDACTED]

Sadisco Auto Salvage, [REDACTED] Street

Miami, Florida

Date of Loss: September 28, 2003

Claim [REDACTED]

W&W File #03-SF451

Page 3

Lamp and a 15-ampere fuse in fuse location #23, which protects HEGO Sensors, Canister Vent, Automatic Transmission and CMS Sensor. An air conditioning hose on the passenger side of the engine was found ruptured and some electrical conductors were fire damaged. Heavier fire damage was observed at the driver's side of the throttle body housing which may indicate a fuel related fire.

CONCLUSION

Based upon my investigation, it is my opinion that this fire originated in the engine compartment in the area of the upper portion of the engine. At this time the exact fire cause is undetermined. In an effort to determine the exact cause of the fire, an examination of the engine by a mechanical engineer may result in a cause determination.

This concludes my investigation into this matter. If you should you have any questions or require additional information, please feel free to contact my office at your earliest convenience at 1-877-362-3473 and reference file #03-SF451.

Sincerely,

Ward & Whitmore Universal Fire Consultants, Inc.



Dennis Kerr, CFI, CFEI
Fire Consultant - Boca Raton Office

DK/p

Attachments

INVESTIGATION PHOTOGRAPHS

E065-005-LC1-1530

INVESTIGATION PHOTOGRAPHS

W&W File #: 03-SF451

Claim #: [REDACTED]

Insured

Location:

[REDACTED]
2001 Ford Expedition, VIN #1FMRU15W11L [REDACTED]

Sadlco Auto Salvage, [REDACTED]

Miami, Florida

Date of Inspection:

October 23, 2003

By:

Dennis Kerr, CFI, CFE

Photo No.

1-7

Comments:

This series of photographs depicts directional views of the Ford Expedition XLT, VIN #1FMRU15W11L [REDACTED]



ERG-200-LC1-1801

W&W File #03-SF451

Claim #

Refer to Previous Photo #1

Photo #2



Photo #3



EM05-085-LC1-1682

Photo #4



Photo #5



Photo #6

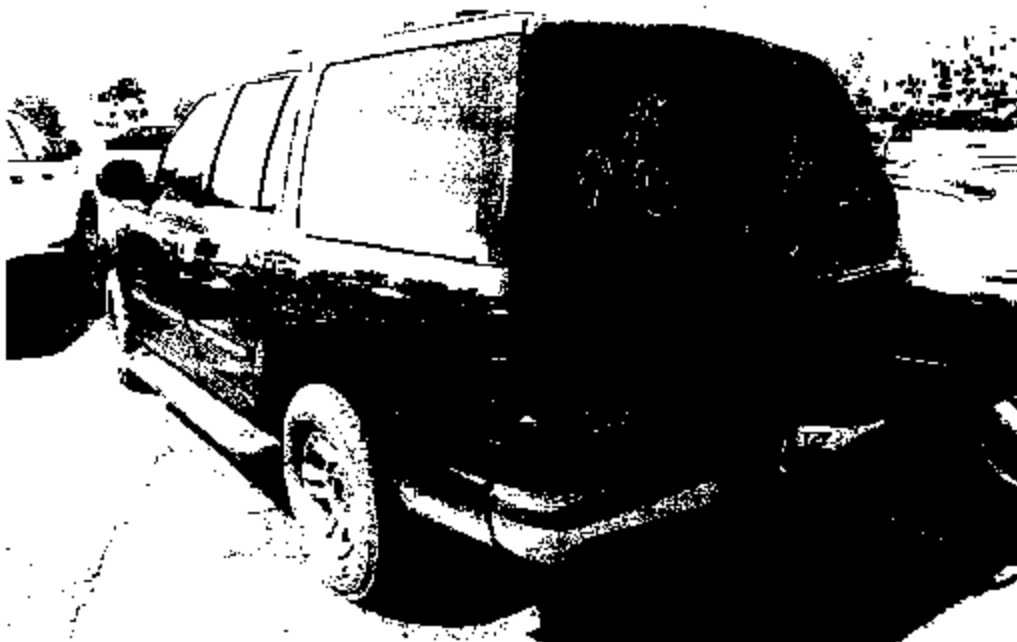


Photo #7



INVESTIGATION PHOTOGRAPHS

zW File #: 03-SF451

Claim #: [REDACTED]

**Insured
Location:**

[REDACTED]
2001 Ford Expedition, VIN #1FMRU16W11 [REDACTED]
Sadisco Auto Salvage, [REDACTED] Street
Miami, Florida

**Date of inspection:
By:**

October 23, 2003
Dennis Kerr, CFI, CFEI

Photo No.

8-9

Comments:

This series of photographs depicts exterior views of the plastic vent that is located below the windshield that exhibited melting on the passenger and driver's side with the heaviest melting noted to be on the passenger side.



W&W File #03-SF451

Claim #

Refer to Previous Photo #1

Photo #9



ENG-005-LC1-1885

INVESTIGATION PHOTOGRAPHS

W&W File #: 03-SF451

Claim # [REDACTED]

Insured [REDACTED]

Location:

2001 Ford Expedition, VIN #1FMRU15W11 [REDACTED]

Sadisco Auto Salvage, [REDACTED]

Miami, Florida

Date of Inspection:

October 23, 2003

By:

Dennis Kerr, CFI, CFEI

Photo No.

10

Comments:

This photograph depicts the interior of the vehicle as seen from the front driver's side door.



0003-000-LC1-1687

INVESTIGATION PHOTOGRAPHS

W&W File #: 03-8F451

Claim #: [REDACTED]

Insured [REDACTED]

Location:

2001 Ford Expedition, VIN #1FMRU15W11J [REDACTED]
Sadisco Auto Salvage, [REDACTED]
Miami, Florida

Date of Inspection:

October 23, 2003

By:

Dennis Kerr, CFI, CFEI

Photo No.

11-12

Comments:

This series of photographs depicts views of the Ford Motor Company manufacturer's information label noted inside the front driver's side door.



EP03-005-1C1-1592

W&W File #03-SF451

Claim #

Refer to Previous Photo #11

Photo #12



W&W-005-LC1-1000

INVESTIGATION PHOTOGRAPHS

W&W File #: 03-SF451

Claim #: 031530886

Insured

Location:

2001 Ford Expedition, VIN #1FMRU15W11L
Sadisco Auto Salvage,
Miami, Florida

Date of inspection:

October 23, 2003

By:

Dennis Kerr, CFI, CFEI

Photo No.

13

Comments:

This photograph depicts a view of the front interior of the vehicle as seen from the driver's front door.



EDS-005-LC1-1590

INVESTIGATION PHOTOGRAPHS

W&W File #: 03-SF451

Claim #: [REDACTED]

Insured

Location:

[REDACTED]
2001 Ford Expedition, VIN #1FMRU15W11 [REDACTED]

Sadisco Auto Salvage [REDACTED]

Miami, Florida

Date of Inspection:

October 23, 2003

By:

Dennis Kerr, CFI, CFEI

Photo No.

14-15

Comments:

This series of photographs depicts views of the rear passenger compartment as seen from the rear driver's side door.



EA05-005-LC1-1691

W&W File #03-SF451

Claim #

Refer to Previous Photo #14

Photo #15



ER05-005-LC1-1682

INVESTIGATION PHOTOGRAPHS

W&W File #: 03-SF451

Claim #: [REDACTED]

Insured

Location:

[REDACTED]
2001 Ford Expedition, VIN #1FMRU15W11U [REDACTED]
Sadisco Auto Salvage, [REDACTED]
Miami, Florida

Date of Inspection:

October 23, 2003

By:

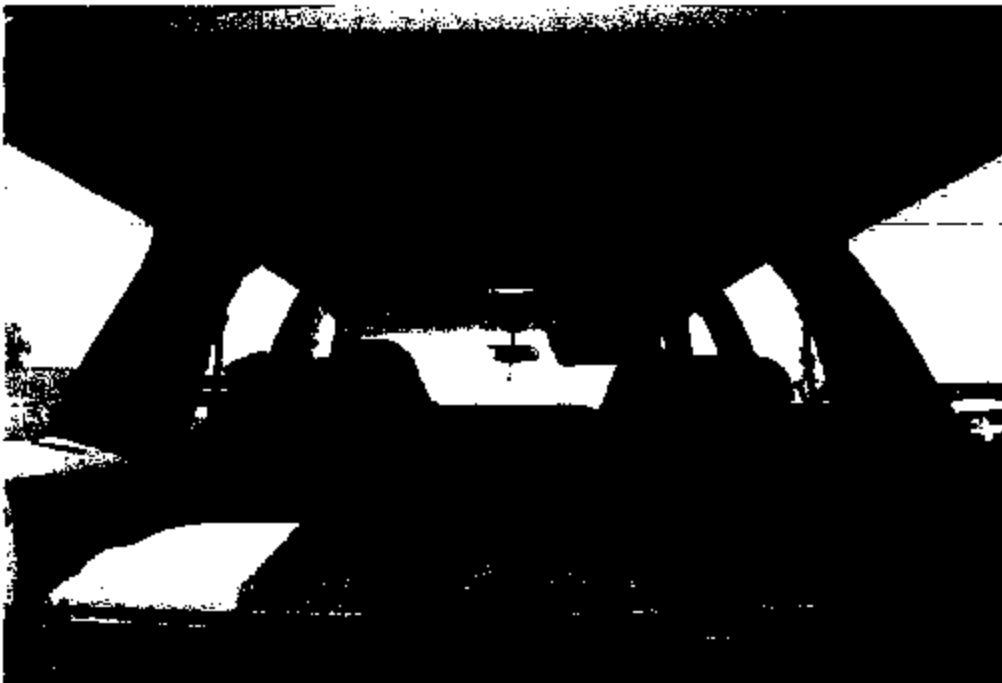
Dennis Kerr, CFI, CFEI

Photo No.

16-17

Comments:

This series of photographs depicts views of the passenger compartment as seen from the rear hatchback.

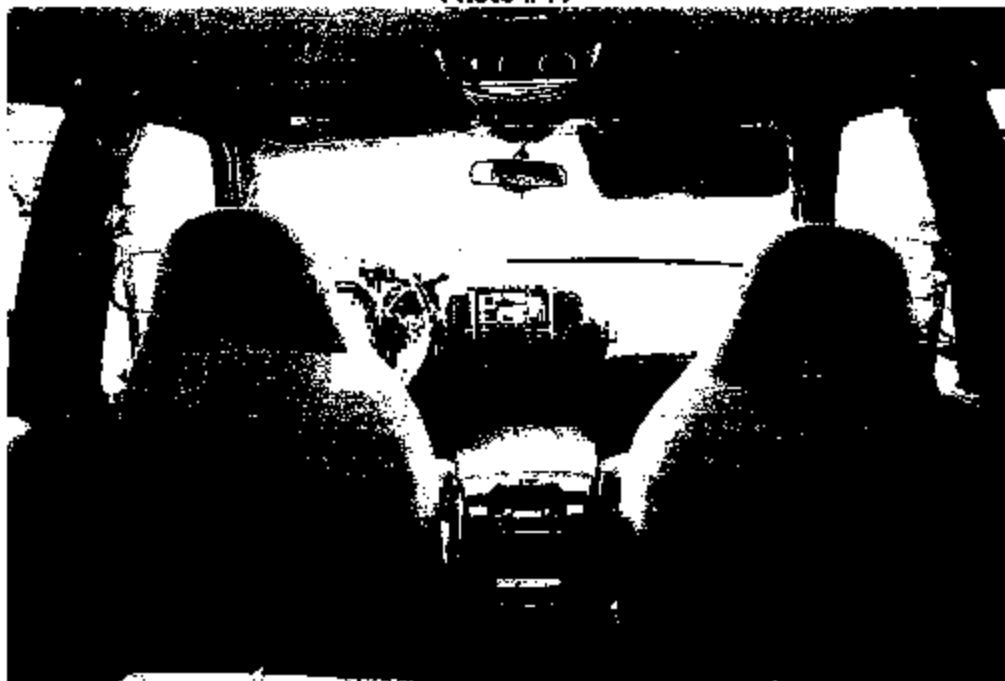


W&W File #03-SF451

Claim #

Refer to Previous Photo #16

Photo #17



ENS-005-LC1-1694

INVESTIGATION PHOTOGRAPHS

W&W File #: 03-SF451

Claim #: [REDACTED]

Insured [REDACTED]

Location:

2001 Ford Expedition, VIN #1FMRU15W11L [REDACTED]
Sadisco Auto Salvage, [REDACTED]
Miami, Florida

Date of Inspection:

October 23, 2003

By:

Dennis Kerr, CFI, CFEI

Photo No.

18

Comments:

This photograph depicts a view of the rear passenger compartment as seen from the rear passenger side door.



ER05-005-LC1-1595

INVESTIGATION PHOTOGRAPHS

W&W File #: 03-SF451

Claim #: [REDACTED]

Insured [REDACTED]

Location:

2001 Ford Expedition, VIN #1FMRU15W1 [REDACTED]

Sadisco Auto Salvage [REDACTED]

Miami, Florida

Date of Inspection:

October 23, 2003

By:

Dennis Kerr, CFI, CFEI

Photo No.

19

Comments:

This photograph depicts a view of the passenger compartment as seen from the front passenger side door.



INVESTIGATION PHOTOGRAPHS

W&W File #: 03-SF451

Claim # [REDACTED]

Insured [REDACTED]

Location: 2001 Ford Expedition, VIN #1FMRU16W11U [REDACTED]
Sedisco Auto Salvage, [REDACTED]
Miami, Florida

Date of inspection: October 23, 2003

By: Dennis Kerr, CFI, CFEI

Photo No. 20

Comments: This photograph depicts a view of the engine compartment with the hood in the "open" position.



ER05-005-LC1-1897

INVESTIGATION PHOTOGRAPHS

W&W File #: 03-SF451

Claim # [REDACTED]

Insured [REDACTED]

Location:

2001 Ford Expedition, VIN #1FMRU15W11L [REDACTED]

Sadisco Auto Salvage, [REDACTED]

Miami, Florida

Date of inspection:

October 23, 2003

By:

Dennis Kerr, CFI, CFEI

Photo No.

21-22

Comments:

This series of photographs depicts views of the underside engine compartment hood.



ENDS-005-LC1-1000

W&W File #03-SF451

Claim

Refer to Previous Photo #21

Photo #22



EWOS-005-1C1-1888

INVESTIGATION PHOTOGRAPHS

W&W File #: 03-SF451

Claim #: [REDACTED]

Insured [REDACTED]

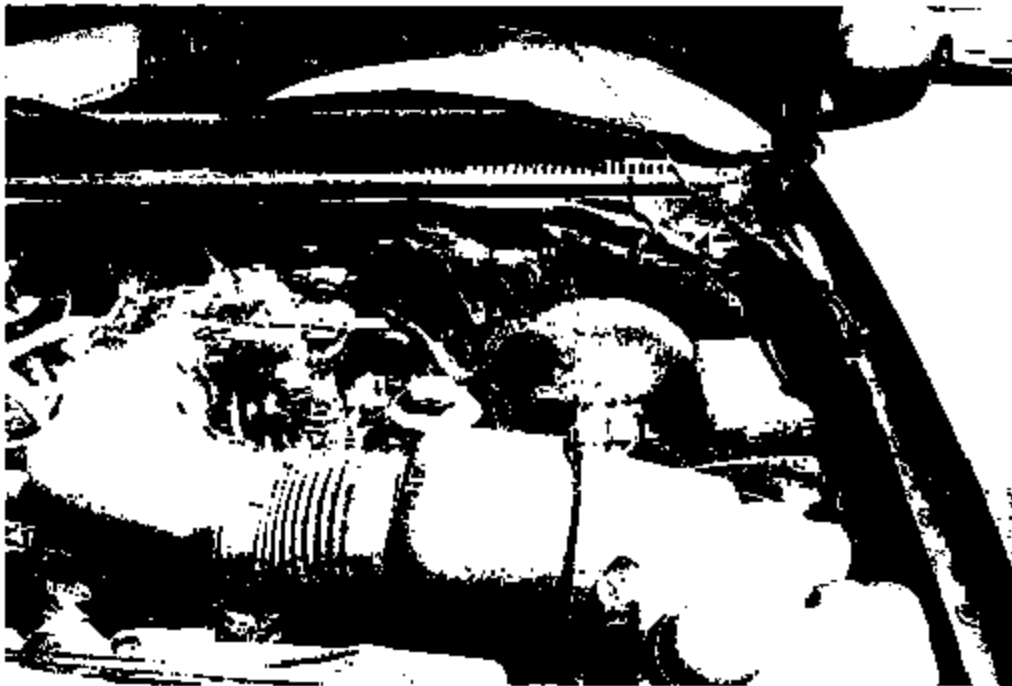
Location: 2001 Ford Expedition, VIN #1FMRU15W11 [REDACTED]
Sadiaco Auto Salvage [REDACTED]
Miami, Florida

Date of Inspection: October 23, 2003

By: Dennis Kerr, CFI, CFEI

Photo No. 23

Comments: This photograph depicts a view of the driver's side engine compartment.



EOSS-005-LC1-1700

INVESTIGATION PHOTOGRAPHS

W&W File #: 03-SF451

Claim #: [REDACTED]

Insured [REDACTED]

Location:

2001 Ford Expedition, VIN #1FMRU15W11 [REDACTED]
Sadioco Auto Salvage [REDACTED]
Miami, Florida

Date of Inspection:

October 23, 2003

By:

Dennis Karr, CFI, CFEI

Photo No.

24

Comments:

This photograph depicts a view of the passenger side of the engine compartment.



ENCLOSURE LC1-1701

INVESTIGATION PHOTOGRAPHS

W&W File #: 03-SF451

Claim #: [REDACTED]

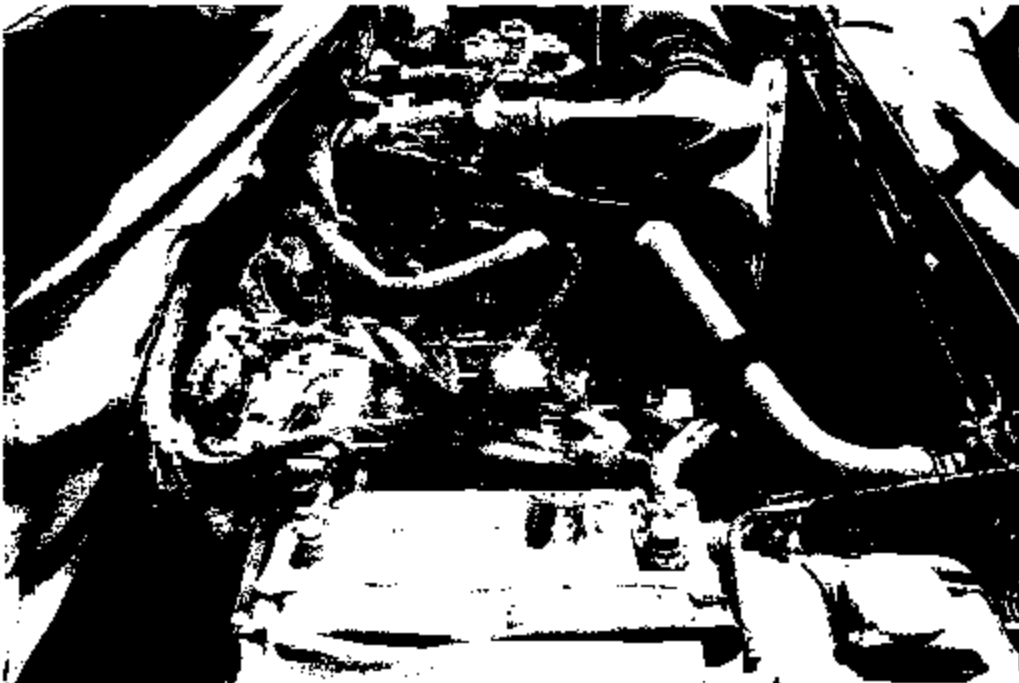
Insured [REDACTED]

Location: 2001 Ford Expedition, VIN #1FMRU15W11L [REDACTED]
Sadisco Auto Salvage, [REDACTED]
Miami, Florida

Date of Inspection: October 23, 2003
By: Dennis Kerr, CFI, CFEI

Photo No. 25

Comments: This photograph depicts a view of the engine compartment as seen from the passenger side of the vehicle.



INVESTIGATION PHOTOGRAPHS

W&W File #: 03-SF451

Claim #: [REDACTED]

Insured [REDACTED]

Location:

2001 Ford Expedition, VIN #1FMRU15W11U [REDACTED]
Sadisco Auto Salvage, [REDACTED]
Miami, Florida

Date of inspection:

October 23, 2003

By:

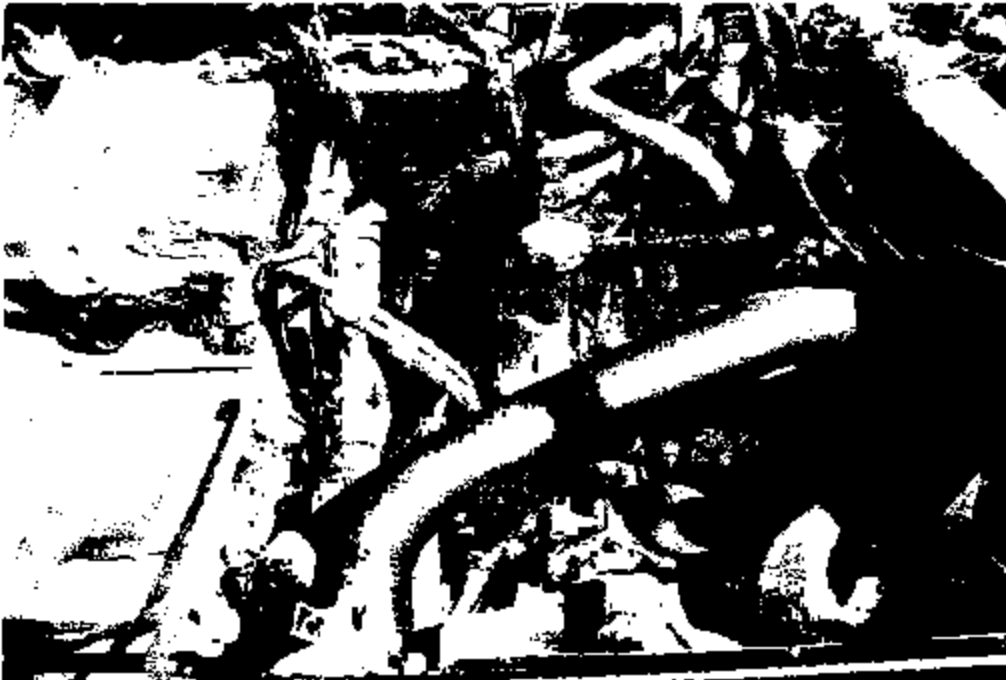
Dennis Kerr, CFI, CFE

Photo No.

26

Comments:

This photograph depicts a view of the passenger side engine compartment as seen from the front of the vehicle.



INVESTIGATION PHOTOGRAPHS

W&W File #: 03-SF451

Claim #: [REDACTED]

Insured [REDACTED]

Location:

2001 Ford Expedition, VIN #1FMRU15W11U [REDACTED]

Sadisco Auto Salvage, [REDACTED]

Miami, Florida

Date of Inspection:

October 23, 2003

By:

Dennis Kerr, CFI, CFEI

Photo No.

27

Comments:

This photograph depicts a ruptured air conditioning hose within the engine compartment.



INVESTIGATION PHOTOGRAPHS

W&W File #: 03-SF451

Claim #: [REDACTED]

Insured [REDACTED]

Location:

2001 Ford Expedition, VIN #1FMRU15W11 [REDACTED]

Sadisco Auto Salvage [REDACTED]

Miami, Florida

Date of Inspection:

October 23, 2003

By:

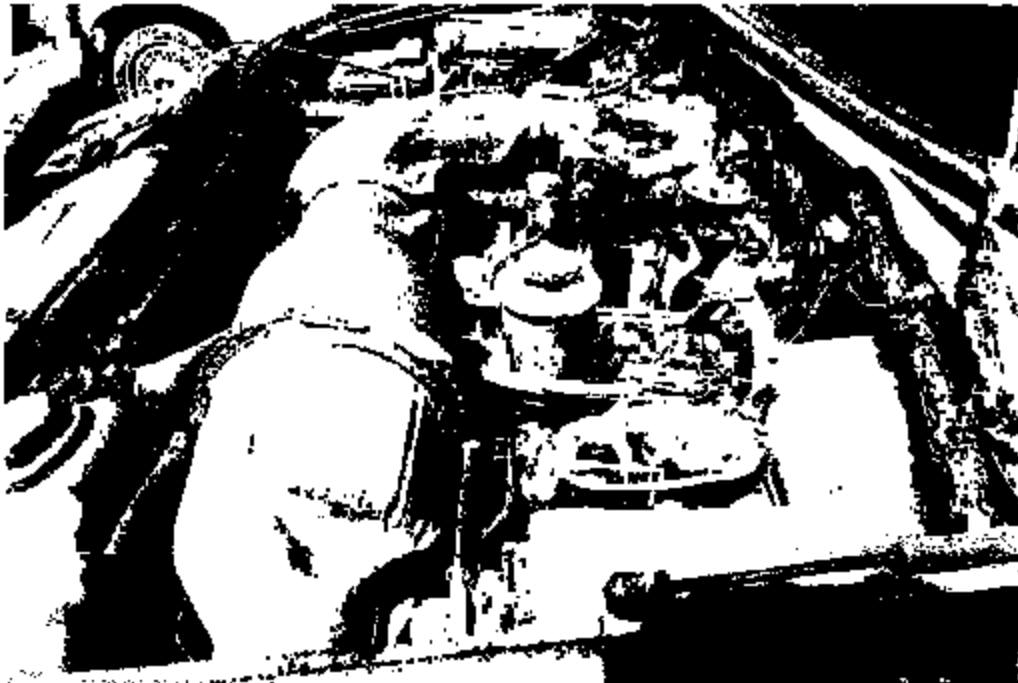
Dennis Kerr, CFI, CFEI

Photo No.

28

Comments:

This photograph depicts a view of the engine compartment as seen from the driver's side of the vehicle.



INVESTIGATION PHOTOGRAPHS

W&W File #: 03-SF461

Claim #: [REDACTED]

Insured [REDACTED]

Location:

2001 Ford Expedition, VIN #1FMRU15W11 [REDACTED]
Sadisco Auto Salvage, [REDACTED]
Miami, Florida

Date of Inspection:

October 23, 2003

By:

Dennie Kerr, CFI, CFEI

Photo No.

29

Comments:

This photograph depicts a view of the engine compartment as seen from the driver's front corner.



ER05-005-LC1-1706

INVESTIGATION PHOTOGRAPHS

W&W File #: 03-SF451

Claim #: [REDACTED]

Insured [REDACTED]

Location: 2001 Ford Expedition, VIN #1FMRU15W11L [REDACTED]
Sadisco Auto Salvage, [REDACTED]
Miami, Florida

Date of Inspection: October 23, 2003
By: Dennis Kerr, CFI, CFEI

Photo No. 30

Comments: This photograph depicts a passenger side view of the radiator.



INVESTIGATION PHOTOGRAPHS

W&W File #: 03-SF451

Claim # [REDACTED]

Insured [REDACTED]

Location:

2001 Ford Expedition. VIN #1FMRU15W11 [REDACTED]

Sadisco Auto Salvage, [REDACTED]

Miami, Florida

Date of Inspection:

October 23, 2003

By:

Dennis Kerr, CFI, CFEI

Photo No.

31

Comments:

This photograph depicts a driver's side view of the radiator.



EP05-085-LC1-1788

INVESTIGATION PHOTOGRAPHS

W&W File #: 03-SF451

Claim # [REDACTED]

Insured [REDACTED]

Location:

2001 Ford Expedition, VIN #1FMRU15W11L [REDACTED]
Sadisco Auto Salvage [REDACTED]
Miami, Florida

Date of Inspection:

October 23, 2003

By:

Dennis Kerr, CFI, CFEI

Photo No.

32-36

Comments:

This series of photographs depicts views of the air conditioning controls within the interior passenger compartment.

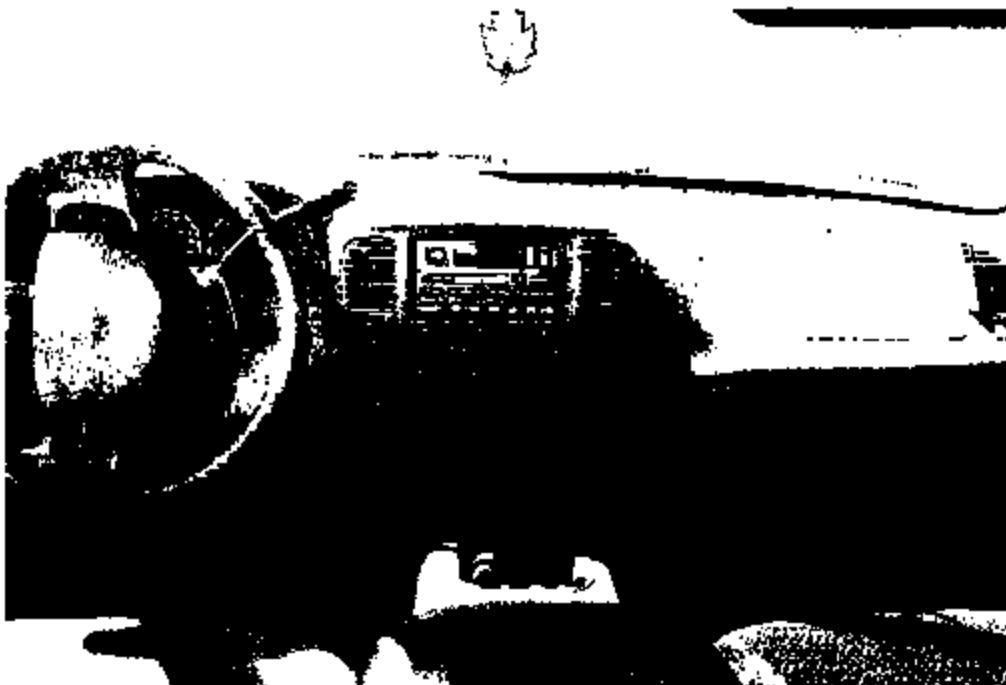


Photo #33



Photo #34

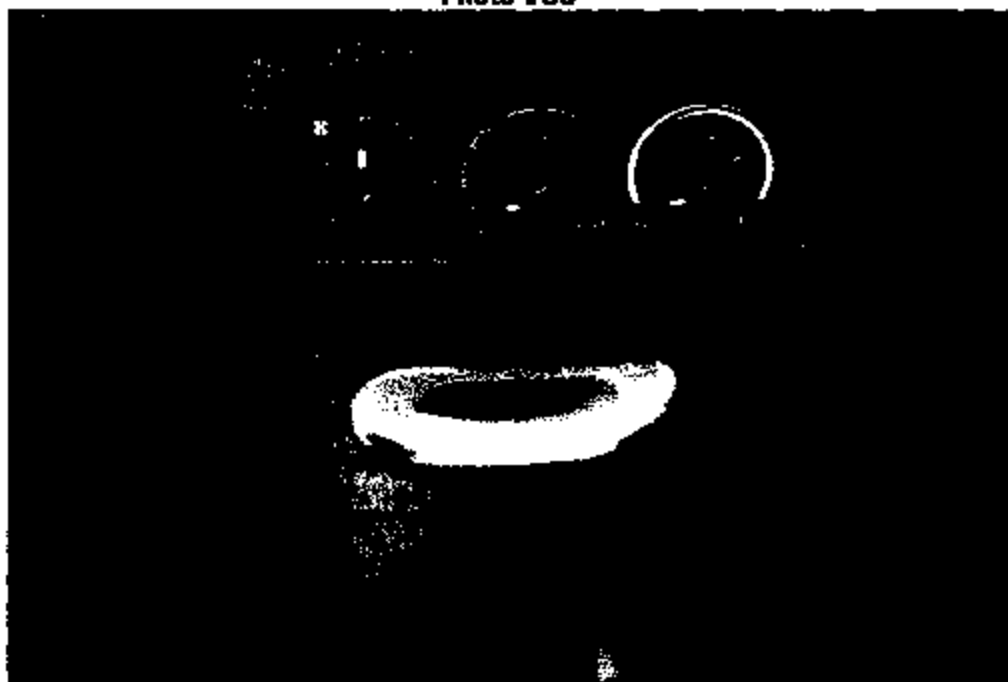


W&W File #03-SF451

Claim #

Refer to Previous Photo #32

Photo #35



ENCLOSURE LC1-1711

INVESTIGATION PHOTOGRAPHS

W&W File #: 03-SF451

Claim # [REDACTED]

Insured: Lazaro Vina
Location: 2001 Ford Expedition, VIN #1FMRU15W11 [REDACTED]
Sadisco Auto Salvage [REDACTED]
Miami, Florida
Date of inspection: October 23, 2003
By: Dennis Kerr, CFI, CFEI

Photo No. 36

Comments: This photograph depicts a view of the fuse panel located in the engine compartment.



INVESTIGATION PHOTOGRAPHS

W&W File #: 03-SF451

Claim #: [REDACTED]

Insured [REDACTED]

Location:

2001 Ford Expedition, VIN #1FMRU15W11 [REDACTED]

Sadisco Auto Salvage, [REDACTED]

Miami, Florida

Date of inspection:

October 23, 2003

By:

Dennis Kerr, CFI, CFEI

Photo No.

37-38

Comments:

This series of photographs depicts views of the fuse panel located on the driver's side within the engine compartment.



W&W File #03-SF451

Claim #

Refer to Previous Photo #37

Photo #38



EROS-885-LC1-1714

INVESTIGATION PHOTOGRAPHS

W&W File #: 03-SF451

Claim #: [REDACTED]

Insured [REDACTED]

Location:

2001 Ford Expedition, VIN #1FMRU15W11U [REDACTED]
Sadisco Auto Salvage, 3025 NW 123rd Street
Miami, Florida

Date of Inspection:

October 23, 2003

By:

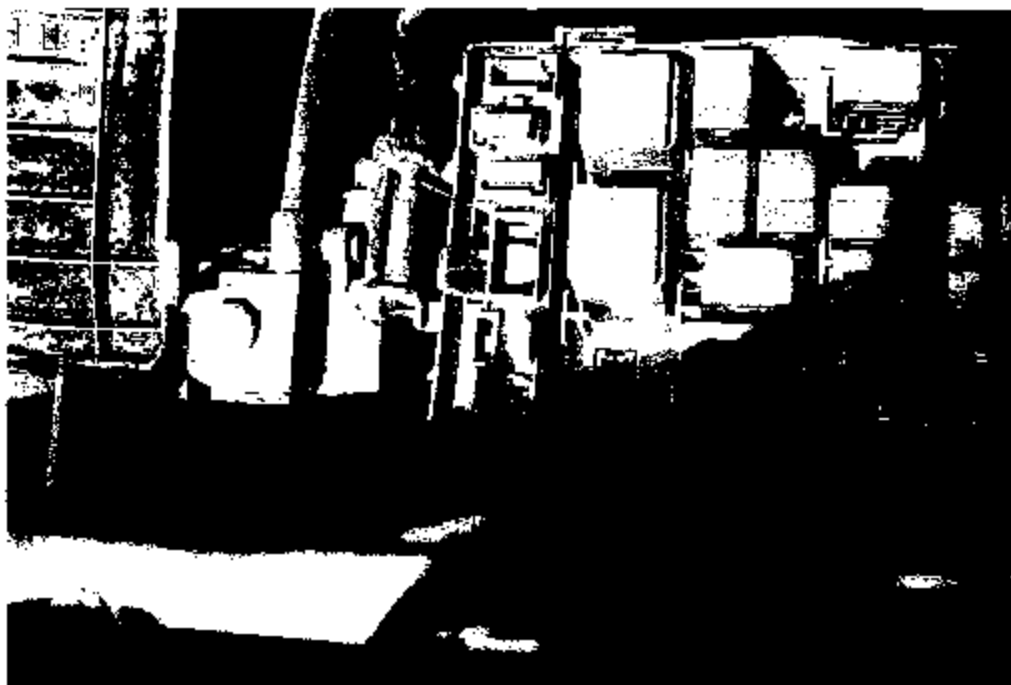
Dennis Kerr, CFI, CFEI

Photo No.

39

Comments:

This photograph depicts an 10-ampere and 15-ampere fuses located on the left of this photograph were found to be blown and all other fuses were found intact.



INVESTIGATION PHOTOGRAPHS

W&W File #: 03-SF451

Claim #: [REDACTED]

Insured [REDACTED]

Location:

2001 Ford Expedition, VIN #1FMRU15W11 [REDACTED]

**Sadisco Auto Salvage,
Miami, Florida**

Date of inspection:

October 23, 2003

By:

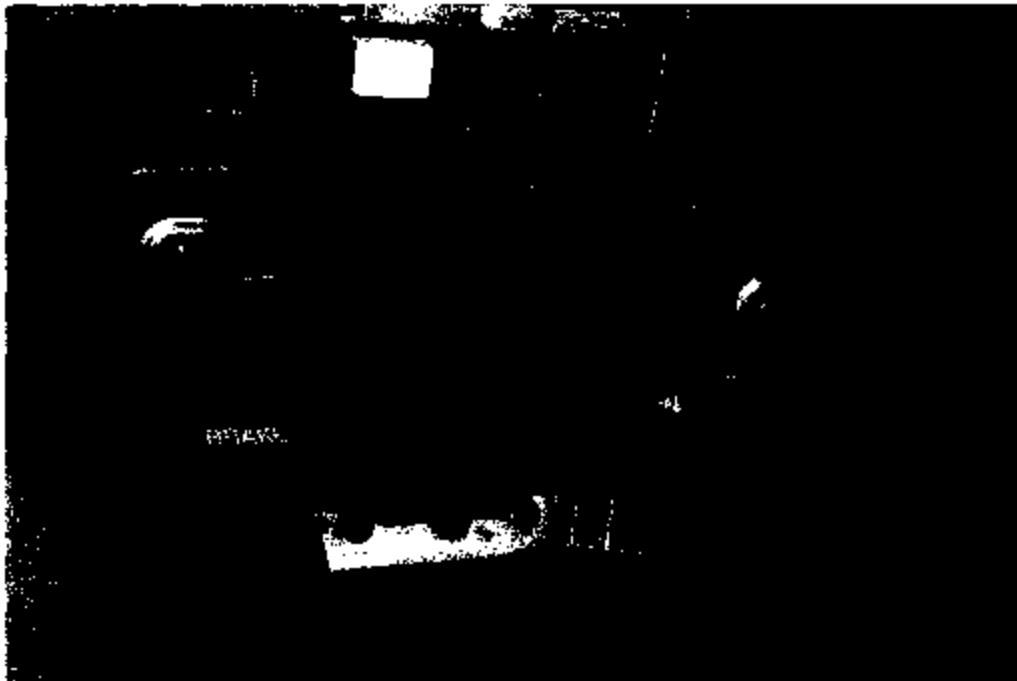
Dennis Kerr, CFI, CFEI

Photo No.

40

Comments:

This photograph depicts a view of the fuse panel located below the driver's side instrument panel within the interior of the vehicle.



INVESTIGATION PHOTOGRAPHS

W&W File #: 03-SF451

Claim # [REDACTED]

Insured [REDACTED]

Location: 2001 Ford Expedition, VIN #1FMRU15W11 [REDACTED]
Sadisco Auto Salvage, [REDACTED]
Miami, Florida

Date of Inspection: October 23, 2003
By: Dennis Kerr, CFI, CFEI

Photo No. 41

Comments: This photograph depicts the interior fuse panel. An examination of these fuses revealed them to be intact.



E905-805-LC1-1717

INVESTIGATION PHOTOGRAPHS

W&W File #: 03-SF451

Claim #:

Insured

Location:

2001 Ford Expedition, VIN #1FMRU15W1
Sadisco Auto Salvage
Miami, Florida

Date of Inspection:

By:

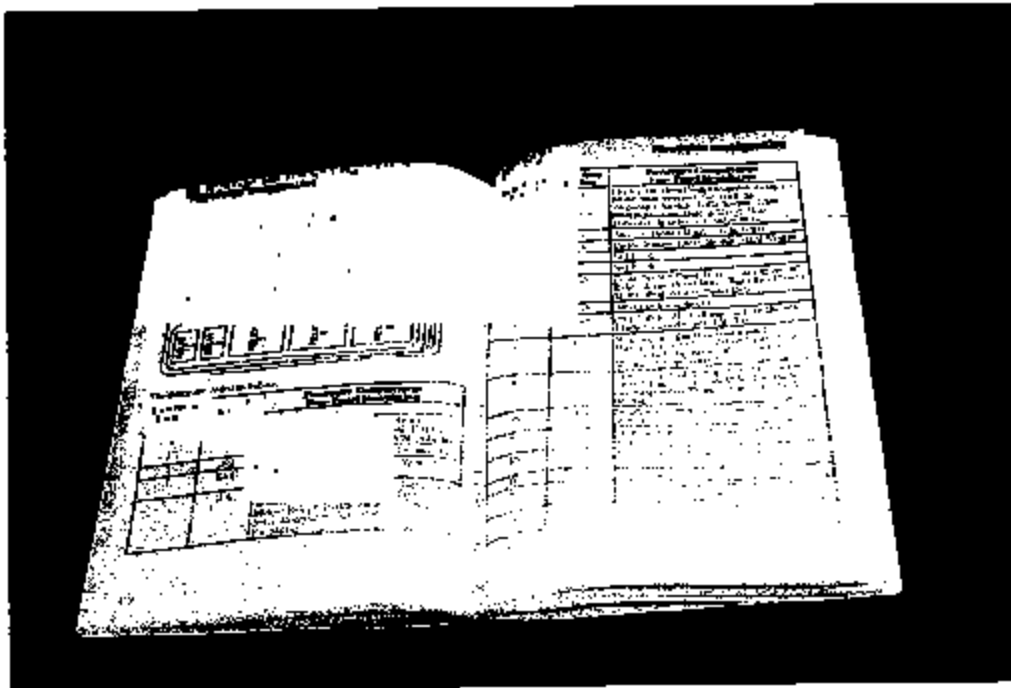
October 23, 2003
Dennis Kerr, CFI, CFEI

Photo No.

42-49

Comments:

This series of photographs depicts views of the fuse panel information found in the owner's manual of the vehicle.



W&W File #03-SF451

Claim

Refer to Previous Photo #42

Photo #43



FOI-000-LC1-1718

Photo #44

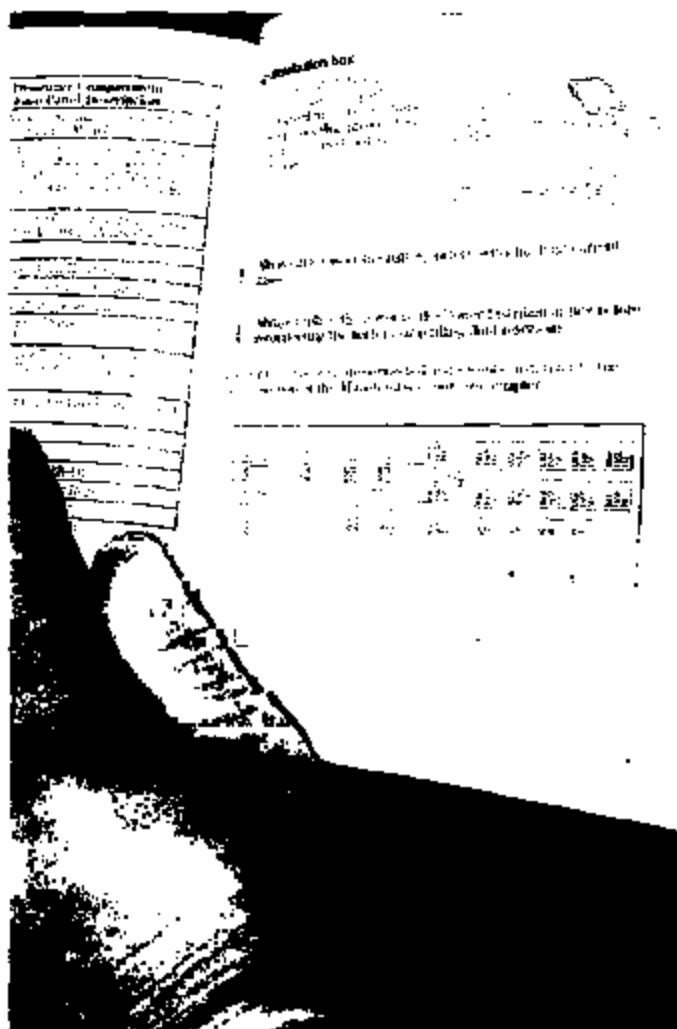


Photo #46

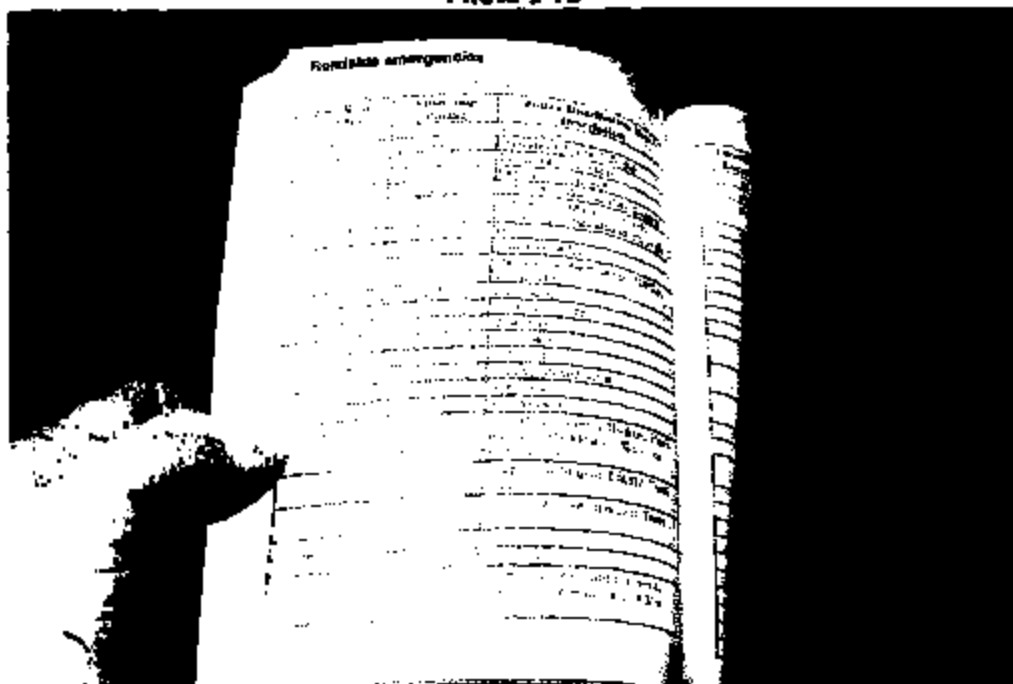
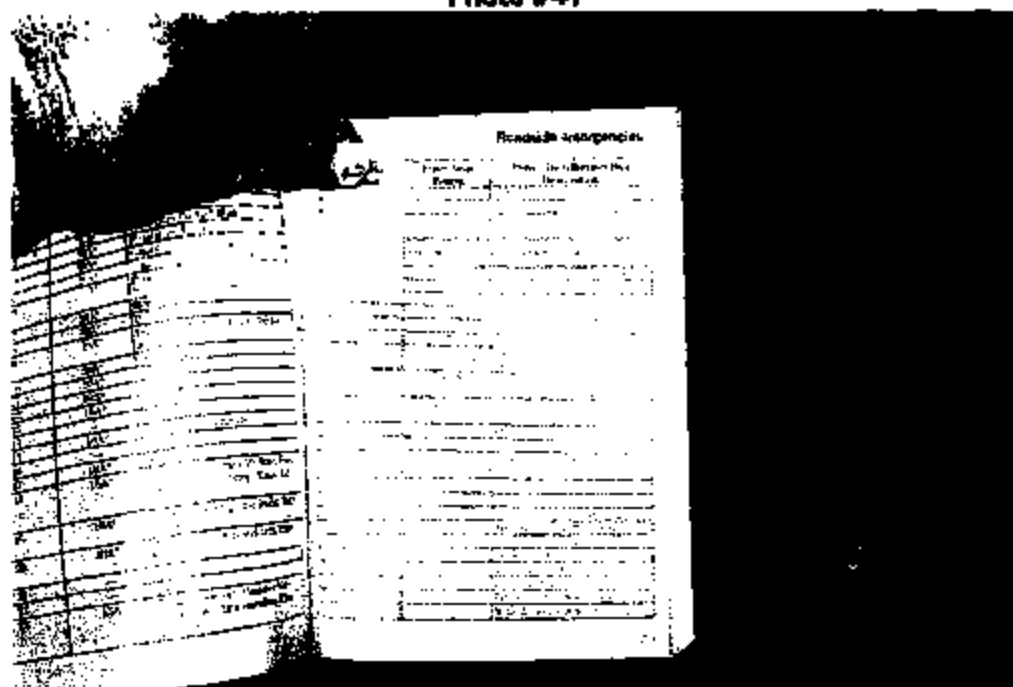


Photo #47

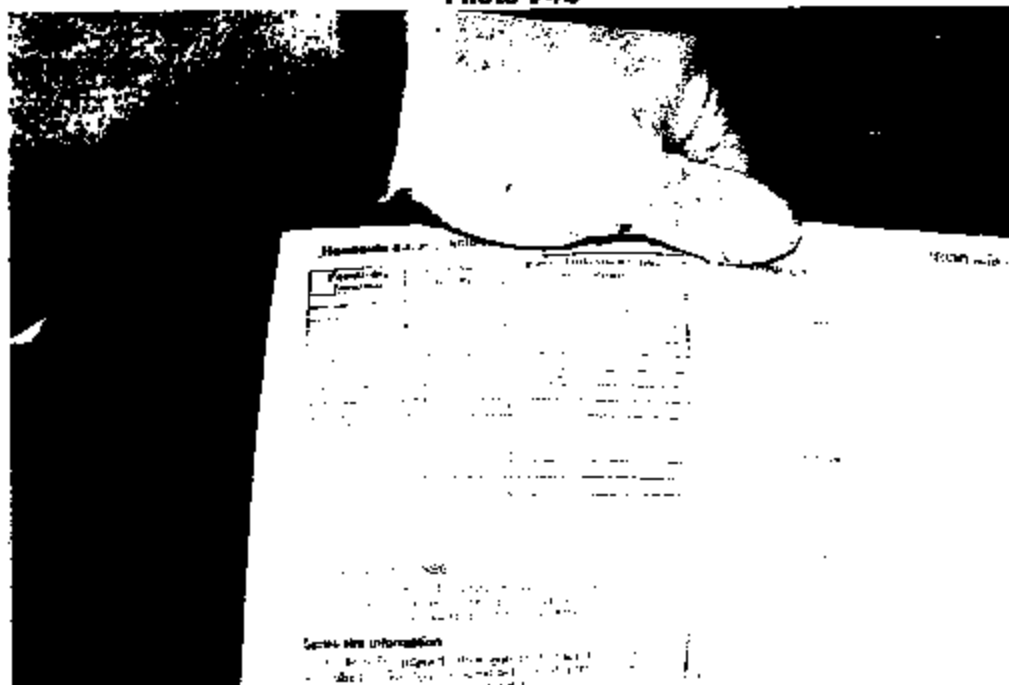


W&W File #03-SF451

Claim #

Refer to Previous Photo #42

Photo #48



ERG5-885-LC1-1723

INVESTIGATION PHOTOGRAPHS

W&W File #: 03-SF451

Claim # [REDACTED]

Insured [REDACTED]

Location:

2001 Ford Expedition, VIN #1FMRU15W11 [REDACTED]
Sedisco Auto Salvage, [REDACTED]
Miami, Florida

Date of Inspection:

October 23, 2003

By:

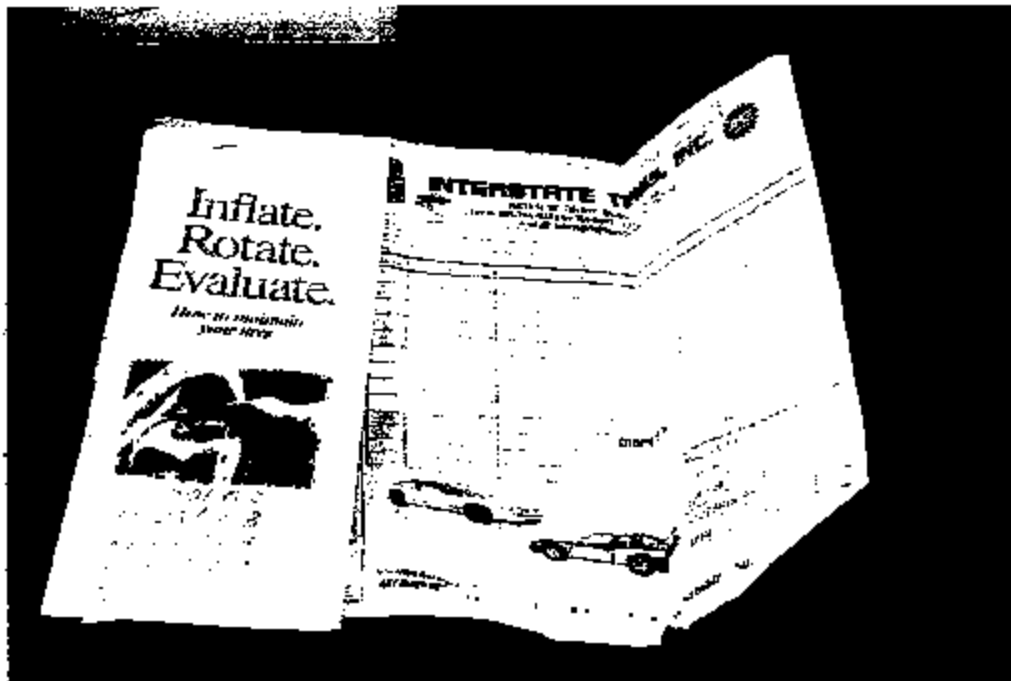
Dennis Kerr, CFI, CFEI

Photo No.

50

Comments:

This photograph depicts an invoice reflecting four tires were purchased in 2002.



EA05-085-LC1-1724

W&W File #03-SF451


Claim #

Refer to Previous Photo #42

Photo #50

INTERSTATE TRIPS, INC.
1840 N. 1st Ave. Minneapolis, MN 55415
Phone: 612-338-1234 Telex: 254 338-1234
Fax: 612-338-1234

| DISPOSAL | |
|-----------------|--|
| VEHICLE # | |
| DATE ACQUIRED | |
| SUB TOTAL | |
| STATE SALES TAX | |
| TOTAL | |



INVESTIGATION PHOTOGRAPHS

W&W File #: 03-SF451

Claim # [REDACTED]

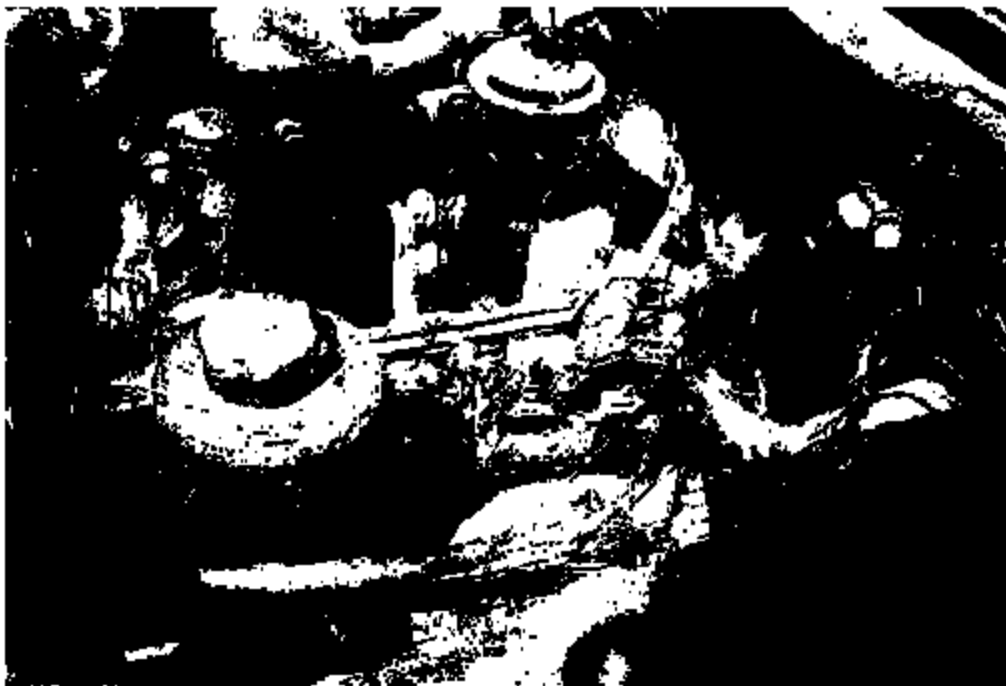
Insured [REDACTED]

Location: 2001 Ford Expedition, VIN #1FMRU15W11
Sadisco Auto Salvage, [REDACTED]
Miami, Florida

Date of Inspection: October 23, 2003
By: Dennis Kerr, CFI, CFEI

Photo No. 51

Comments: This photograph depicts a view of the driver's side fuel rail.



INVESTIGATION PHOTOGRAPH

W File #: 03-SF451

Claim #: 0

**Insured
Location:**

**2001 Ford Expedition, VIN #1FMRU16W11L
Sadisco Auto Salvage,
Miami, Florida**

**Date of Inspection:
By:**

**October 23, 2003
Dennis Karr, CFI, CFEI**

Photo No.

52

Comments:

This photograph depicts a view of the passenger side fuel rail.



INVESTIGATION PHOTOGRAPHS

W&W File #: 03-SF451

Claim #: [REDACTED]

Insured

Location:

[REDACTED]
2001 Ford Expedition, VIN #1FMRU15W11L [REDACTED]
Sadisco Auto Salvage, [REDACTED]
Miami, Florida

Date of Inspection:

By:

October 23, 2003
Dennis Kerr, CFI, CFEI

Photo No.

53

Comments:

This photograph depicts a view of the alternator as seen from the passenger side.





| | | | | | | | |
|---|--|--------------------------------------|--|--|--|---|--|
| 1. Name Roseboro Sheriff | | 2. Date 2-5 | | 3. Case No. 04/0000 | | 4. Incident No. 97-4953 | |
| 5. Report Date 05/07/97 | | 6. Report Time 10:30 | | 7. Location Highway 97, 1/2 mi. S of | | 8. Time 1:17 | |
| 9. Incident Type Vehicle Fire | | | | 10. Description Vehicle Fire | | 11. Weapons | |
| 12. Incident Address (Street No., Street Name, City, State, Zip) [Redacted] | | | | 13. City, State, Zip P. H. 106 NY | | 14. Location Code | |
| 15. Sex M | | 16. Race White | | 17. Age 30 | | 18. Height 5'10" | |
| 19. Weight 170 | | 20. Eyes Blue | | 21. Hair Brown | | 22. Complexion Fair | |
| 23. Birth Date 05/07/67 | | 24. Birth Place Albany, NY | | 25. Social Security [Redacted] | | 26. Date of Birth 05/07/67 | |
| 27. Date of Birth 05/07/67 | | 28. Age 30 | | 29. Sex M | | 30. Race White | |
| 31. Height 5'10" | | 32. Weight 170 | | 33. Eyes Blue | | 34. Hair Brown | |
| 35. Complexion Fair | | 36. Birth Date 05/07/67 | | 37. Birth Place Albany, NY | | 38. Social Security [Redacted] | |
| 39. Date of Birth 05/07/67 | | 40. Age 30 | | 41. Sex M | | 42. Race White | |
| 43. Height 5'10" | | 44. Weight 170 | | 45. Eyes Blue | | 46. Hair Brown | |
| 47. Complexion Fair | | 48. Birth Date 05/07/67 | | 49. Birth Place Albany, NY | | 50. Social Security [Redacted] | |
| 51. Date of Birth 05/07/67 | | 52. Age 30 | | 53. Sex M | | 54. Race White | |
| 55. Height 5'10" | | 56. Weight 170 | | 57. Eyes Blue | | 58. Hair Brown | |
| 59. Complexion Fair | | 60. Birth Date 05/07/67 | | 61. Birth Place Albany, NY | | 62. Social Security [Redacted] | |
| 63. Date of Birth 05/07/67 | | 64. Age 30 | | 65. Sex M | | 66. Race White | |
| 67. Height 5'10" | | 68. Weight 170 | | 69. Eyes Blue | | 70. Hair Brown | |
| 71. Complexion Fair | | 72. Birth Date 05/07/67 | | 73. Birth Place Albany, NY | | 74. Social Security [Redacted] | |
| 75. Date of Birth 05/07/67 | | 76. Age 30 | | 77. Sex M | | 78. Race White | |
| 79. Height 5'10" | | 80. Weight 170 | | 81. Eyes Blue | | 82. Hair Brown | |
| 83. Complexion Fair | | 84. Birth Date 05/07/67 | | 85. Birth Place Albany, NY | | 86. Social Security [Redacted] | |
| 87. Date of Birth 05/07/67 | | 88. Age 30 | | 89. Sex M | | 90. Race White | |
| 91. Height 5'10" | | 92. Weight 170 | | 93. Eyes Blue | | 94. Hair Brown | |
| 95. Complexion Fair | | 96. Birth Date 05/07/67 | | 97. Birth Place Albany, NY | | 98. Social Security [Redacted] | |
| 99. Date of Birth 05/07/67 | | 100. Age 30 | | 101. Sex M | | 102. Race White | |
| 103. Height 5'10" | | 104. Weight 170 | | 105. Eyes Blue | | 106. Hair Brown | |
| 107. Complexion Fair | | 108. Birth Date 05/07/67 | | 109. Birth Place Albany, NY | | 110. Social Security [Redacted] | |
| 111. Date of Birth 05/07/67 | | 112. Age 30 | | 113. Sex M | | 114. Race White | |
| 115. Height 5'10" | | 116. Weight 170 | | 117. Eyes Blue | | 118. Hair Brown | |
| 119. Complexion Fair | | 120. Birth Date 05/07/67 | | 121. Birth Place Albany, NY | | 122. Social Security [Redacted] | |
| 123. Date of Birth 05/07/67 | | 124. Age 30 | | 125. Sex M | | 126. Race White | |
| 127. Height 5'10" | | 128. Weight 170 | | 129. Eyes Blue | | 130. Hair Brown | |
| 131. Complexion Fair | | 132. Birth Date 05/07/67 | | 133. Birth Place Albany, NY | | 134. Social Security [Redacted] | |
| 135. Date of Birth 05/07/67 | | 136. Age 30 | | 137. Sex M | | 138. Race White | |
| 139. Height 5'10" | | 140. Weight 170 | | 141. Eyes Blue | | 142. Hair Brown | |
| 143. Complexion Fair | | 144. Birth Date 05/07/67 | | 145. Birth Place Albany, NY | | 146. Social Security [Redacted] | |
| 147. Date of Birth 05/07/67 | | 148. Age 30 | | 149. Sex M | | 150. Race White | |
| 151. Height 5'10" | | 152. Weight 170 | | 153. Eyes Blue | | 154. Hair Brown | |
| 155. Complexion Fair | | 156. Birth Date 05/07/67 | | 157. Birth Place Albany, NY | | 158. Social Security [Redacted] | |
| 159. Date of Birth 05/07/67 | | 160. Age 30 | | 161. Sex M | | 162. Race White | |
| 163. Height 5'10" | | 164. Weight | | | | | |

TO: Amy Histak
National Grange

RE: [REDACTED]
96 Ford F150

REPORT

PRELIMINARY:

As per your request on June 30, 1997 I travelled to ABC Salvage Yard, located in Mechanicsville, New York and examined a 1996 Ford F150 Pickup. The vehicle was identified by the Yard owner and yard personnel. The vehicle was in three pieces: the cab, the frame and the engine. The cab and frame were stored in the yard, but the engine was stored in the garage and had been partially disassembled.

PURPOSE OF EXAMINATION:

1. To determine the origin and cause of the fire which the vehicle sustained.

EXTERIOR EXAMINATION:

The vehicle was in three different parts: I examined the cab first.

The cab had been removed from the frame. There was no truck bed attached to it. The cab sustained burn damage to the grille and headlight area, the hood, both front fenders, the roof, the top front of the passenger door, the driver's door and cab behind the door.

All of the windows were broken.

The cab can be seen in photos 1 - 6.

I then examined the frame. The bumper was attached to the frame. The front axle and wheels were in place but the tires had burned. The fuel lines on the frame were visible from the front to the rear. The rear axle and wheels are missing and the fuel tank is missing. The fuel filter was in place.

The front of the frame was burned in the area of the engine. There were no other engine parts on the frame.

The frame can be seen in photos 32 - 42.

CONCLUSION:

ORIGIN:

The burn patterns seen on the exterior of the truck; the heavy burn to the engine compartment, hood, grille, headlights and fenders; and lighter burn on the doors and roof point to the engine compartment as the area of origin. Because the vehicle has been dismantled and many parts are missing, it is not possible to determine the exact point of origin.

I spoke with Lori Moon who was the operator of the pickup. She stated that, at about 8:05 AM, she went out to the pickup and started the engine. She went back in the house to get the children to take them to the bus stop. The kids had decided to walk. While in the house she heard the horn blow. When she looked out the window, the lights flashed on. When Lori came out she saw what she thought was smoke from overheating of the radiator. She called her neighbor to ask for help with the overheated engine, and then she saw flames coming from the front of the hood. She called 911 to report the fire. The engine was still running. When she came out from calling 911, the engine was stopping. She then heard the starter trying to start the engine. She heard this a couple of times.

CAUSE:

Based on the evidence left, the cause of the fire appears to be electrical. Wiring on the driver's side was found that was shorted and overheated. The battery on the driver's side was almost totally destroyed, while the battery on the passenger side sustained burn damage to the top, in particular.

Because so many parts are missing and the vehicle was disassembled, it was not possible to determine the exact cause.

A copy of the fire department report is enclosed. They concluded that the fire was electrical also. They did see the vehicle after the fire, before it was taken apart.

Should further information become available after the completion of this examination that may be pertinent to this file, please forward it to our office for review and possible further action.

Should you have any further questions in reference to this file, please do not hesitate to contact our office at your earliest convenience.

Earl M. Faunce

Earl M. Faunce CFBI
Certified Fire and Explosion Investigator

Michael O'Shaughnessey

Michael O'Shaughnessey, CFBI, CFI,
ABFE
Senior Fire Investigator

| | | | | | | | | | | | |
|--|--|-----------------------------------|--|---|--|----------------------------|--|-----------------------------|--|-----------------------------------|--|
| 1. Agency Rensselaer County Sheriff's | | 2. Division/Section 2-9 | | 3. New York State INCIDENT REPORT | | 4. Date 04/06/04 | | 5. Case No. | | 6. Incident No. 77-4953 | |
| 7. Report Date 05/07/97 | | 8. Report Time 10:30 | | 9. Occurred On/Off Ward | | 10. Day Wed | | 11. Date 05/07/97 | | 12. Time 0932 | |
| 13. Day Wed | | 14. Date 05/07/97 | | 15. Time 10:30 | | 16. Day Wed | | 17. Date 05/07/97 | | 18. Time 10:30 | |
| 19. Incident Type Vehicle Fire | | | | | | | | | | | |
| 20. Location (Street No., Street Name, City, State, Zip) [Redacted] | | | | | | | | | | | |
| 21. City, State, Zip (<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>) P. H. St. NY | | | | | | | | | | | |
| 22. Police Type: <input type="checkbox"/> On-Call <input type="checkbox"/> On-Call <input type="checkbox"/> On-Call <input type="checkbox"/> On-Call <input type="checkbox"/> On-Call <input type="checkbox"/> On-Call <input type="checkbox"/> On-Call <input type="checkbox"/> On-Call <input type="checkbox"/> On-Call <input type="checkbox"/> On-Call <input type="checkbox"/> On-Call | | | | | | | | | | | |
| 23. Name (Last, First, Middle, Suffix) RP Lora Moon | | | | | | | | | | | |
| 24. Date of Birth 01/13/48 | | | | | | | | | | | |
| 25. Address (Street No., Street Name, City, State, Zip) 21 N. Main St, Ullrich, N.Y. | | | | | | | | | | | |
| 26. Phone Number 607-348-1348 | | | | | | | | | | | |
| 27. Class of Birth Male | | | | | | | | | | | |
| 28. Age 56 | | | | | | | | | | | |
| 29. Sex Male | | | | | | | | | | | |
| 30. Race White | | | | | | | | | | | |
| 31. Ethnic Origin Irish | | | | | | | | | | | |
| 32. Height 5'10" | | | | | | | | | | | |
| 33. Weight 160 | | | | | | | | | | | |
| 34. Eyes Blue | | | | | | | | | | | |
| 35. Hair Grey | | | | | | | | | | | |
| 36. Complexion Fair | | | | | | | | | | | |
| 37. Marital Status Married | | | | | | | | | | | |
| 38. Social Security No. [Redacted] | | | | | | | | | | | |
| 39. Education High School | | | | | | | | | | | |
| 40. Occupation Retired | | | | | | | | | | | |
| 41. Vehicle Make Ford | | | | | | | | | | | |
| 42. Vehicle Model 444 | | | | | | | | | | | |
| 43. Vehicle Year 87 | | | | | | | | | | | |
| 44. Vehicle Color Green | | | | | | | | | | | |
| 45. Vehicle License IFTX14H4TK48 | | | | | | | | | | | |
| 46. Vehicle Description Pickup | | | | | | | | | | | |
| 47. Vehicle Status 1 | | | | | | | | | | | |
| 48. Vehicle Location 1316 Ford P.O. | | | | | | | | | | | |
| 49. Vehicle Condition Good | | | | | | | | | | | |
| 50. Vehicle Damage 1 | | | | | | | | | | | |
| 51. Vehicle Remarks Vehicle parked in driveway by Garage. Moon started vehicle then went inside. Moon heard loud bang as truck started as soon as engine and observed lights on on and off. Fire started from underneath front of vehicle. Moon called 911 to report vehicle was on fire and close to residence. Fire started and spread to interior of house. Fire started in front of house. Fire started in front of house. | | | | | | | | | | | |
| 52. Vehicle Damage 1 | | | | | | | | | | | |
| 53. Vehicle Damage 1 | | | | | | | | | | | |
| 54. Vehicle Damage 1 | | | | | | | | | | | |
| 55. Vehicle Damage 1 | | | | | | | | | | | |
| 56. Vehicle Damage 1 | | | | | | | | | | | |
| 57. Vehicle Damage 1 | | | | | | | | | | | |
| 58. Vehicle Damage 1 | | | | | | | | | | | |
| 59. Vehicle Damage 1 | | | | | | | | | | | |
| 60. Vehicle Damage 1 | | | | | | | | | | | |
| 61. Vehicle Damage 1 | | | | | | | | | | | |
| 62. Vehicle Damage 1 | | | | | | | | | | | |
| 63. Vehicle Damage 1 | | | | | | | | | | | |
| 64. Vehicle Damage 1 | | | | | | | | | | | |
| 65. Vehicle Damage 1 | | | | | | | | | | | |
| 66. Vehicle Damage 1 | | | | | | | | | | | |
| 67. Vehicle Damage 1 | | | | | | | | | | | |
| 68. Vehicle Damage 1 | | | | | | | | | | | |
| 69. Vehicle Damage 1 | | | | | | | | | | | |
| 70. Vehicle Damage 1 | | | | | | | | | | | |
| 71. Vehicle Damage 1 | | | | | | | | | | | |
| 72. Vehicle Damage 1 | | | | | | | | | | | |
| 73. Vehicle Damage 1 | | | | | | | | | | | |
| 74. Vehicle Damage 1 | | | | | | | | | | | |
| 75. Vehicle Damage 1 | | | | | | | | | | | |
| 76. Vehicle Damage 1 | | | | | | | | | | | |
| 77. Vehicle Damage 1 | | | | | | | | | | | |
| 78. Vehicle Damage 1 | | | | | | | | | | | |
| 79. Vehicle Damage 1 | | | | | | | | | | | |
| 80. Vehicle Damage 1 | | | | | | | | | | | |
| 81. Vehicle Damage 1 | | | | | | | | | | | |
| 82. Vehicle Damage 1 | | | | | | | | | | | |
| 83. Vehicle Damage 1 | | | | | | | | | | | |
| 84. Vehicle Damage 1 | | | | | | | | | | | |
| 85. Vehicle Damage 1 | | | | | | | | | | | |
| 86. Vehicle Damage 1 | | | | | | | | | | | |
| 87. Vehicle Damage 1 | | | | | | | | | | | |
| 88. Vehicle Damage 1 | | | | | | | | | | | |
| 89. Vehicle Damage 1 | | | | | | | | | | | |
| 90. Vehicle Damage 1 | | | | | | | | | | | |
| 91. Vehicle Damage 1 | | | | | | | | | | | |
| 92. Vehicle Damage 1 | | | | | | | | | | | |
| 93. Vehicle Damage 1 | | | | | | | | | | | |
| 94. Vehicle Damage 1 | | | | | | | | | | | |
| 95. Vehicle Damage 1 | | | | | | | | | | | |
| 96. Vehicle Damage 1 | | | | | | | | | | | |
| 97. Vehicle Damage 1 | | | | | | | | | | | |
| 98. Vehicle Damage 1 | | | | | | | | | | | |
| 99. Vehicle Damage 1 | | | | | | | | | | | |
| 100. Vehicle Damage 1 | | | | | | | | | | | |





ERG5-825-LC1-1738

National
Grange
Mutual
Insurance
Company



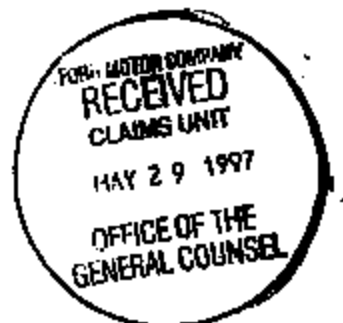
5010 Campuswood Drive, P.O. Box 4828
Syracuse, NY 13221-4828
(315) 434-1400

May 22, 1997

Ford Motor Co.
Office of General Council
Parklane Towers W., Suite 400
3 Parklane Blvd.
Dearborn, MI 48126

Dear Mary Skevington,

RE:
Our Insured: [REDACTED]
Policy # : [REDACTED]
Date of Loss: 5-7-97
Type of Loss: Automobile Fire
Vehicle : 1FTEX14H4T [REDACTED]
Is



I am writing this regarding a fire loss to the above captioned vehicle which occurred on May 7, 1997. This vehicle was purchased at Team and Goewey Ford, P.O. Box 300, New Lebanon, NY 12125, 518-766-5000 in November of 1995.

Due to the nature of this loss, and the fact that this is a new vehicle with considerably low mileage, we have arranged for a cause and origin examination of the vehicle to determine what caused this fire. We have arranged for North Eastern Technical Services Inc. (NETS), P.O. Box 5150, Fall River, MA 02723, (508) 675-0999 to conduct this cause and origin investigation.

The purpose of this letter is to provide you with the opportunity to conduct a co-examination of this vehicle. If you would like to arrange a co-examination of the vehicle with a representative of NETS, Please contact me at 1-800-626-6020 Extension 1411 to arrange a mutually agreeable appointment. If you do not contact me within 10 days of the receipt of this letter, I will assume you have relinquished your rights to examine the vehicle, and will examine the vehicle in your absence. I would like to caution that should your expert fail to appear at the inspection, you will forfeit any right to subsequently claim prejudice under Nally v. Volkswagen of America, Inc. 405 Mass 191 (1989)

Sincerely,
Amy Hickok
Claims Representative

cc: [REDACTED]
Valley Falls, NY [REDACTED]

cc: Nets
P.O. Box 5150

A Main Street America company

ENR-603-LC1-1738

PRODUCED BY FORD



AN 31 2005

New

BEGINNING OF CONTACT
01/29/2005

VOICE OF THE CUSTOMER TRACKING SYSTEM

08.60.09

| | | |
|--------------------|-----------------------|----------------------|
| REGION: 21 ATLANTA | OGC ISSUE | CASE NBR: 1340670286 |
| VIN: 1FTDF0729V4 | ZONE: B2 | OPENED: 01/28/2005 |
| | ENGINE: 2 VEH TYPE: T | CLOSED: 01/28/2005 |

| | | | | | |
|--------------|---|-------------|---------------------------|---------|--------|
| LAST NAME: | | FIRST NAME: | | STATUS: | CLOSED |
| TITLE: | | | | MI: | |
| ADDRESS: | | | | | |
| CITY: | COLUMBIA | STATE: | SC | ZIP: | |
| HOME PHONE: | | | | | |
| MODEL YEAR: | 1997 | MODEL: | F150 4X2 FLARESIDE PICKUP | | |
| MILEAGE: | 160000 | | | | |
| DEALER NAME: | PULLIAM MOTOR CO | SALES CODE: | F21228 | P & A: | 00942 |
| REASON CODE: | 0762 LEGAL - ACCIDENT / FIRE | | | | |
| SYMPTOMS: | 704145 FIRE/SMOKE VISIBLE FLAME UNDERHOOD | | | | |

ORIGIN: CAC138 - US CONCERN CASE BASE COMMUNICATION PHONE
 ACTION: 706 - CONTACT ADVANCED TO OGC
 DOCUMENT: ANALYST: LPEREZ44 LITISHA ANN PEREZ

DATE: 01/28/2005 TIME: 09:28:05:
ACTION DATA/COMMENTS:

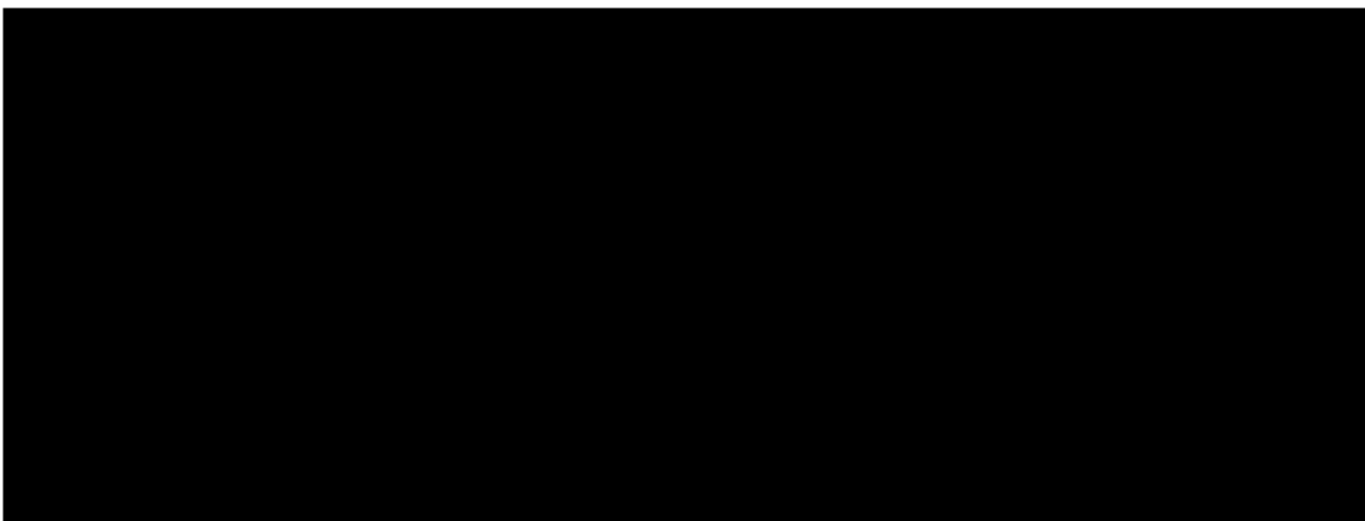
CUSTOMER SAID: - VEH CAUGHT ON FIRE- DATE OF FIRE: 01/25/05-
 DEFECT: UNKNOWN- LOCATION OF THE VEH: VEH WAS AT CUST HOME-
 FIRE REPORT FILED: YES- FINDINGS OF THE REPORT: UNDETERMINE
 D- REPORT NUMBER AND COUNTY: # 05-001804 AND RICHLAND COUNTY
 - CLAIM FILED: YES- STATUS OF THE CLAIM: INS CO WANTS TO PIC
 K UP VEH- VEH REPAIRABLE: UNLIKELY- FIRE ORIGINATED: UNDERHO
 OD- VEH RUNNING AT THE TIME: NO- WHEN VEH BURNED UP IT ALSO
 CAUSED DAMAGE TO AN ADJACENT VEH IN THE DRIVEWAY AS WELL AS
 BURNED A NEARBY TREE- DEALER SAID: PULLIAM MOTOR CO (LOCAL DLR
) 2800 TWO NOTCH ROAD COLUMBIA, SC 29204 CRC ADVISED: I WILL F
 ORWARD THIS INFORMATION TO THE FORD OGC DEPARTMENT. YOU WILL
 BE CONTACTED WITHIN 3-5 BUSINESS DAYS- ADVISED THAT WHEN O
 GC CONTACTS CUST THEY WOULD BE ABLE TO ADVISE OF WHAT ADDITI
 ONAL INFO THEY WOULD NEED AND PROVIDE CUST THE MEANS TO SEND
 IT- CSR RECOMMENDS THAT CUST LEAVE VEH IN THE DRIVEWAY UNTI
 L OGC ADVISES CUST OTHERWISE. CSR IS UNSURE ON WHAT OGC MAY
 WANT TO DO WITH VEH VEH AND IT IS POSSIBLE THAT THEY MAY WAN
 T TO SEE THE ADDITIONAL DAMAGE THAT WAS DONE. ONCE OGC CONTA
 CT CUST THEY CAN ADVISE CUST ON WHAT TO DO WITH THE VEH



CONSUMER AFFAIRS

01/29/2005 FAXGIN

ERG5-085-LC1-1737



State Farm Insurance Companies



July 12, 1999

Ford Motor Company Office Of The General Counsel
3 Parklane Blvd, PTW 400
Dearborn, MI 48126-2568
Attn: Shawn L. Norton, Claims Analyst

P.O. Box 8012
Salem Spc, NY 13020
1-888-326-0163
Hours of Operation:
Monday through Friday 8am - 5pm

RE: Claim Number: [REDACTED]
Date of Loss: March 21, 1999
Our Insured: [REDACTED]
Your Insured: Ford Motor Company
Your File No: NOW Transportation
Your Policy No: [REDACTED]

Dear Shawn:

Enclosed is a copy of our insured's recorded statement. Please
match to the above-mentioned file. Thank you.

Sincerely,

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

New England Subrogation Team
bs
(888) 326-0153 Ext. 3830

State Farm Fire and Casualty Company

HOME OFFICES: BLOOMINGTON, ILLINOIS 61710-0001

ERS-888-LC1-1736

Date: June 30, 1999
Re: Interview Claim #: [REDACTED]

Page 1

Uh, this is Christie McIntyre interviewing uh, [REDACTED] from my office via telephone. Today's date is um, March 31st, 1999n and the time is approximately uh, 20 after four in the afternoon.

Q: Um, could you state your name and spell your last name, please?

A: It's [REDACTED], that's [REDACTED]

Q: And is this interview being recorded with your full knowledge and consent?

A: Yes.

Q: Okay, and what is your current home address?

A: [REDACTED], Bellerica, Mass, [REDACTED]

Q: Okay, and what is your age?

A: Forty-nine.

Q: And are you married or single?

A: Married.

Q: Okay, and where are you employed?

A: I'm not.

Q: Okay.

A: Retired.

Q: Okay, and..and is it true that you were uh, driving a 1997 Ford Expedition um, on March 21st, 1999 and it caught fire?

A: Correct.

Q: Okay, um, and who's the registered owner of the '97 Ford Expedition?

A: My son Paul, Now Transportation.

Q: Okay, uh, were there any passengers in your vehicle at the time?

A: No.

Q: Okay, and..and did you have permission to drive the vehicle?

A: Yes.

FCO SUBRO

JUL 06 1999

2025-005-LC1-1739

Q: Okay, um, and what was the purpose of your trip at the time of the accident?

A: I was..I was taking it to be dropped off at (inaudible) Lincoln Mercury for an appointment on Monday morning to..because the electric windows stopped working.

Q: Okay, um, and can you..can you describe that..that trip to me when the vehicle caught fire?

A: Yes, I was driving along and I had you know, was..it was raining out and as I further went, I left my son's house in Merrimack heading towards your know, towards the Concord area and the rain got heavier. So as I turned, what I did is I turned the wipers onto full, you know what I mean high, 'cause it was raining that hard. Then I started smelling the, it was like the rotten egg smell that was coming out of the vent from the..from the uh, heater. 'Cause I had the defrosters on and then what I did, and so I thought it was the heater, so I shut the heater off and the smell continued. So then what I did is um, I pulled over and I was trying to look to see what..what the problem was and the smoke started getting heavier and heavier. Then I jumped out of the truck and I could see where it was coming out of the vent, I could see like a..like a spark or something. So I put snow down the vent where the um, defroster comes out and it seemed to stop it at the present time. At that point, then what I did is I had a cell phone and I called 911, which is to call the fire department over there and they called, they asked me where I was, I told them and the only thing they did is..then it's..then it started really smoking bad and then it actually I seen flames coming out. I left the vehicle, I called the..I called 911 back and I told them what was happening, they sent a fire engine over, by the time they did the whole thing was burned. That's about the end of it, that's all I can tell you. And then I..I had..like I told you, I just had to discuss with the fireman that it was when I..when I had the wipers on high is when the..when it seemed to increase, that's what..what seemed to..what caused it. In my opinion, I..I don't know for sure 'cause I don't know.

Q: Okay.

A: All right.

Q: Um, when did this take place, do you recall the date?

A: No.

Q: Is it...

A: I don't know.

Q: March 21st, '99, does that sound accurate?

A: That...that sounds accurate, right.

Q: And approximately what time?

A: It was around, I think it was around 9:30, nine..nine, 9:30 at night.

Q: At night?

A: Right.

Q: Okay, and um, where did..did the uh, fire take place?

A: On Gulf Road in Northwood, New Hampshire.

Q: Okay, and where was your destination?

A: I was going..I was going to Coal Road in Northwood, New Hampshire.

Q: Okay.

A: To leave the vehicle and my..my dad was gonna' shoot it over to Concord Mercury 'cause he was going there in the morning.

Q: Okay.

A: I was gonna' drop the vehicle off there and then uh, he was gonna' shoot it over for the appointment to have the windows fixed.

Q: Okay, um, had you had any other problems with the vehicle at the time it..it caught fire?

A: No, nothing.

Q: Okay.

A: It was running fine, everything was going good.

Q: Okay, um, and how long did it take uh, 911 to arrive at the scene of the accident?

A: Well, I know I'm being recorded but it seemed like forever but it was, I want to say a half hour to 45 minutes, 'cause they have a volunteer fire department for what they explained to me 'cause I was explicit in the 911 call, I was losing my mind. Just standing there watching my son's vehicle burn, you know what I'm saying.

Date: June 30, 1999
Re: Interview Claim #: [REDACTED]

Page 4

Q: Um-hum, and was it..was it the State, it was a local fire department that..

A: Right, the Northwood Fire Department came, (inaudible) Fire Department came.

Q: Okay, and were they able to put out the fire right away?

A: No.

Q: No?

A: No, it was some..some..to do with uh, some kind of metal that was in the truck, some alloy or something, they had uh, they didn't have the proper equipment to put it out so then they called for some other assistance to come over there. And I would say that they were putting the fire out for a good half an hour to 40 to an hour.

Q: Okay.

A: That's how long it took them to put the fire out.

Q: And was the vehicle identifiable after the fire or...

A: Well, just 'cause I knew it but I mean I don't think that any..any uh, normal was to walk up to it that could really say that this is what it was. I mean that..it was totally burned.

Q: Do you know what the mileage was approximately on the..on the vehicle?

A: I..I..I would..I'm just gonna' guess, I want to say it was around 30 somewhat thou..33,000, 34,000 miles.

Q: Okay.

A: 'Cause..'cause the only reason why I know that is because of the..there was a question on the warranty, I guess it's guaranteed to 40,000 miles or something so we had..we had looked at the uh, when I called in Concord Lincoln Mercury for the appointment, [REDACTED] had called for the appointment, they had asked her what the mileage was.

Q: Oh, okay.

A: So it was in..it was in the..it was in the low 30's, I believe it was 33,000 and change.

Q: And was that an uh, an Eddie Bauer Expedition or..

A: I don't know.

Q: You don't know, okay.

A: I don't know.

Q: And how often do you drive the Expedition?

A: It was the second time I ever drove it.

Q: Okay, were you aware of any..any mechanical problems with the vehicle at all?

A: Just I was taking it up to have the window's fixed.

Q: Okay, so it was..it was the win..you had a problem with the window?

A: With the electric windows, right.

Q: And what..what were the electric windows, what were the problem with that you were having with them?

A: Well, there was a..there was a short in them 'cause you..it kept blowing the fuse and we brought it to our service station and uh, they put a new fuse in it, then it worked for a minute, then it blew the fuse again. So I went back and they uh, with my uh, daughter in-law and they put another fuse in and then they said uh, there's no sense putting anymore fuses in it because you have a short somewhere, you need to bring it to the..your..where it's under warranty, just bring it back to Ford.

Q: Oh.

A: So that's..we immediately called Concord Lincoln Mercury and uh, they said the..they gave us an appointment for Monday, which this happened on a Sunday night, I..I know it happened on a Sunday night 'cause we were bringing it there on Monday.

Q: Oh, okay, okay, were there any witnesses that saw the fire?

A: Yeah.

Q: And what were the witnesses name?

A: [REDACTED]

Q: And was he a..was he a neighbor or..

A: No, he..he was a friend of mine, he was following me up there so I could drop the vehicle off and he was gonna' give me a ride home.

- Q: Okay, okay, all right, uh, I guess that's all the questions I have for you. Is there anything that you wanted to add to this statement that you feel may be important?
- A: Just that um, that I don't think that..I think there was definitely the..there's something shorted out in the..in the wiper system is my opinion, is exactly what happened. I stated that to the fire department even prior to me getting the letter that I faxed to you 'cause I had no idea that letter was even coming, as you can see by the date on it. So that's the only thing I wanted to..
- Q: Okay.
- A: All right.
- Q: All right, have you understood all the questions that I've asked you?
- A: Yes.
- Q: And did I have your permission to record this interview?
- A: Yes.
- Q: And was everything you told me true and correct to the best of your knowledge?
- A: Yes, it was.
- Q: Okay, that concludes this statement and I'll turn off the recorder.
- A: All right.

CATEE



State Farm Mutual Automobile
Insurance Company
State Farm Fire and Casualty Company

State Farm County Mutual Insurance
Company of Texas
State Farm Indemnity Company

100-4887 001 4-97 Printed in U.S.A.

6028305 CM
3
Claim Number

AFFIDAVIT OF VEHICLE FIRE (All Questions Must Be Completed in Ink)

1. Name of Insured [REDACTED] Name of Owner Ford Motor Credit
Address Herrin Mack, N.H. Home Phone [REDACTED]
Date of Birth [REDACTED] Marital Status: ☒ Married ☐ Single No. of Dependents 2
Social Security Number [REDACTED] (Optional) Driver's License No. _____
Occupation House wife
Employer's Name _____
Address _____ Phone _____

2. Date of Fire 3/21/99 Time 10:30 ☐ A.M. ☒ P.M.
Make of Vehicle Ford Year 97 Model Expedition Body Type _____ Color white
Vehicle ID # 1FMEH11P42VL License Plate # _____ State N.H.
Certificate of Title # _____ If none, why? _____
Number of cylinders 8 H.P. or C.I. or Liter _____ Odometer reading _____
Was vehicle locked? ☐ Yes ☒ No Were windows rolled up? ☒ Yes ☐ No
When did you last see your vehicle? Date 3/21/99 Time _____ ☐ A.M. ☐ P.M.
Specific location where vehicle burned Gulf Rd. Northwood, N.H.
Reason vehicle was left at this location _____

Name and address of person who left auto at this location [REDACTED]
[REDACTED] Billerica, Ma. Their driver's license no. [REDACTED]

When was the fire discovered? Date 3/21/99 Time 10:30 ☐ A.M. ☒ P.M.

Who made the discovery? [REDACTED]

When was fire reported to fire department? Date 3/21/99 Time 10:30 ☐ A.M. ☒ P.M.

Name and Location of Fire Station Northwood, N.H.

Describe fire (where, color of smoke, cause): UNKNOWN

Was vehicle being driven? ☒ Yes ☐ No Describe exactly what happened prior to noticing smoke or fire (electrical or mechanical malfunction): Both

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

If yes, give type of liquid _____, amount _____, size and type of container _____, location of container at time of fire _____

Did you smell smoke or see flames first? Yes

Have you had similar problems prior to fire? ☒ Yes ☐ No If Yes, explain Electrical
Problems w/ Windows and Wipers.

Has vehicle been damaged during the past three years? ☒ Yes ☐ No If so, give location _____
_____, type of damage _____, amount of damage \$ _____, and date _____

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

Who made the repairs? Mancos Repair Co.

Name and address of insurance company who paid claim damages, if any: State Farm

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

Any other vehicles in your household? ☒ Yes ☐ No

Name of insurance company and agent on other vehicles Coburn Ins. Co.

Your prior insurance company and agent _____

Any homeowners claims within the past 6 months with State Farm? ☐ Yes ☒ No

With any other carrier? No

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

| | | | | | |
|---|---|---|--|--|---|
| <input type="checkbox"/> Radio AM | <input checked="" type="checkbox"/> Power Steer. | <input type="checkbox"/> Vinyl Roof | <input checked="" type="checkbox"/> Cruise Control | Tires: | Transmission: |
| <input checked="" type="checkbox"/> AM/FM | <input checked="" type="checkbox"/> Power Brakes | <input checked="" type="checkbox"/> Tinted Glass | | <input type="checkbox"/> W/W | <input checked="" type="checkbox"/> Automatic |
| <input checked="" type="checkbox"/> Stereo | <input checked="" type="checkbox"/> Power Locks | <input checked="" type="checkbox"/> Mag Wheels | | <input checked="" type="checkbox"/> Radial | <input type="checkbox"/> Standard |
| <input checked="" type="checkbox"/> Tape Deck | <input checked="" type="checkbox"/> Power Windows | <input type="checkbox"/> T-Tops | | <input type="checkbox"/> Special | <input type="checkbox"/> Console |
| <input checked="" type="checkbox"/> Air Cond. | <input checked="" type="checkbox"/> Power Seats | <input checked="" type="checkbox"/> Tilt Steering Wheel | | | |
| <input type="checkbox"/> Other: _____ | | | | | |

☐ CB Radio Type _____ Cost \$ _____ Date Installed _____

Purchased From: _____

4. Vehicle Condition

| | | | |
|--------------|-------------------------------|-------------------------------|---|
| Paint | <input type="checkbox"/> Fair | <input type="checkbox"/> Good | <input checked="" type="checkbox"/> Excellent |
| Transmission | <input type="checkbox"/> Fair | <input type="checkbox"/> Good | <input checked="" type="checkbox"/> Excellent |
| Engine | <input type="checkbox"/> Fair | <input type="checkbox"/> Good | <input checked="" type="checkbox"/> Excellent |
| Body | <input type="checkbox"/> Fair | <input type="checkbox"/> Good | <input checked="" type="checkbox"/> Excellent |

Other distinguishing features: (dents, decals, trailer hitch, interior, etc.)

5. Name and address of service station/garage: Self

Who performs routine maintenance service? Self Date last serviced _____

Who performs State MV inspection? Evon Nashua N.H. Date last inspected 4/98

6. Date car purchased 4/05/97 ☒ New ☐ Used Purchase price \$ 31,532.00
Trade-in _____ Allowance _____
Seller Dealer/Individual Name and Address Iversen Ford Sales
257 Boston Rd. W. Billerica, MA. 01862
How did you learn the car was for sale? _____
How was the car paid for? ☐ Cash ☒ Check
If financed, name and address of finance company Ford Motor Credit

Account # _____ Balance Due \$ _____ Loan Terms 24r/1yr Months 24
Date of last loan payment made 3/1/99
Is account past due? ☐ Yes ☒ No How long? _____
Are keys in your possession? ☒ Yes ☐ No Ignition key # _____ Trunk key # _____
Do you have other theft insurance? ☐ Yes ☒ No Policy # _____
Name of insurance company _____
Was this a rebuilt wreck? ☐ Yes ☒ No If yes, name of rebuilder _____
Was it a recovered theft? ☐ Yes ☒ No If yes, date of theft _____

7. Amount for which you are making claim \$ _____

Any person who, with a purpose to injure, defraud or deceive any insurance company, files a statement of claim containing any false, incomplete or misleading information is subject to prosecution and punishment for insurance fraud, as provided in RSA 638:20.

Witness _____

Policyholder

Monica Paternis
(Signature)

Address _____

SUBSCRIBED AND SWORN TO BEFORE ME this _____ day of _____, 1997

in _____ County, _____

Notary Public _____ My commission expires: _____

S. D. LYONS, INC.

Specialists: Automobile Fires, Fraud Detection, Physical Damage and Mechanical Analysis, Accident Reconstruction

Seeking Office

1980 FALL RIVER AVENUE
SEASIDE, MA 02771
(508) 338-8393
FAX (508) 335-8888

TO State Farm Insurance Company
P.O. Box 6180
Manchester, NH 03108-9955

ATTENTION Christine McIntyre

DATE May 7, 1999

VEHICLE ANALYSIS — SDL# M6634.1

FILE# [REDACTED]
INSURED [REDACTED]
VEHICLE 1997 Ford Expedition
VIN W2V1B12390 (partial)
ODOMETER Unknown
DATE OF LOSS March 21, 1999

Background

On March 21, 1999, the insured was operating the 1997 Ford Expedition. He reported that he was having problems with the windshield wipers and then the dashboard assembly began smoking. The vehicle subsequently caught fire.

Objective

Inspect the Ford Expedition and determine the origin and cause of the fire. Determine the mechanical and cosmetic condition of the Ford at the time of the loss.

DATE INSPECTED March 31, 1999
LOCATION Auto Placement Center, Inc., Salem, NH

SDL# M6634.1 — 05/07/99

1

EN05-885-LC1-1748

Report Highlights

The fire originated within the engine compartment or the passenger compartment. Because of the degree of destruction caused by the fire and the lack of reliable burn patterns, the exact origin and cause cannot be determined.

DETAILED FINDINGS

Vehicle Equipment

| | |
|--------------|--|
| YEAR | 1997 |
| MAKE | Ford |
| MODEL | Expedition |
| BODY | 4 door |
| ENGINE | 4.6 liter, fuel injected V8 engine, mounted inline |
| TRANSMISSION | Automatic transmission with 4-wheel drive |
| FEATURES | Air conditioning, cruise control, antilock brakes, alloy wheels, power windows, power locks, power seats, power mirrors, stereo cassette CD radio, front and rear bench seats, tilt steering column assembly, dual air bags, factory security system |
| AFTERMARKET | None detected |

Cosmetic Condition Before Loss

The Ford Expedition has body-on-frame construction. An examination of the frame and the body panels revealed evidence of prior collision repairs to the right front door and right rear door. The repairs had been completed. There was no old, unrelated damage to the body panels or trim. Nothing was missing from the interior or exterior at the time of the loss. The Expedition was in good cosmetic condition when the fire occurred.

Burn Pattern Analysis

The Ford Expedition was burned throughout the passenger compartment, the engine compartment, and most of the undercarriage. Only the rear undercarriage and the rear bumper assembly were not burned. At the time of the fire, the left front door was open but the remaining doors were closed. We could not determine the positions of the window regulators.

The fire burned intensely throughout the engine compartment and the passenger compartment. All of the sheet metal panels and the structural components at the front of

the vehicle were extensively scorched. All of the combustible materials were consumed and most of the alloy components were melted. The front tires and the combustible materials on the front suspension were also consumed. The hood panel, front fenders, and doors were heat-discolored. Some paint still remained on the lower portion of each rear door and along the lower portion of each rear quarter panel. Most of the paint was burned off the rear hatch assembly, but the vinyl impact strip still remained in place on the rear bumper. The rear tires were partially consumed. The burn patterns show that the progression of the fire was from the front of the vehicle toward the rear of the vehicle.

Within the engine compartment, all available combustible materials were consumed and most of the alloy components were melted. The wire insulation, plastic plug connectors, relays, and other combustible materials of the electrical system were consumed. The wires were subjected to intense heat. Only wire strands, metal terminal connectors, relays, and switches remained. There were no distinguishable burn patterns in the engine compartment. The aluminum components on the engine, and other aluminum components including the ABS unit and the brake master cylinder were melted.

Within the passenger compartment, all available combustible materials were consumed and the alloy components were melted. Only the steel framework of the seats, the dash, and the steering column remained. There were no distinguishable burn patterns in the passenger compartment.

The insured reported that smoke was coming from the dash assembly. A small fire within the engine compartment could produce smoke coming from the dash assembly. The presence of smoke coming from the dash does not exclude the possibility that the fire originated in the engine compartment. All of the combustible materials of the electrical system were consumed. Only the burned wire strands, terminal connectors, and the remains of other metal electrical components remained in the dash. Most of the wires on the left side of the dash were partially melted or broken. The melting of electrical wire strands does not indicate electrical shorting. The wires would melt as a result of peak temperatures attained during the course of the fire. We examined the remains of electrical wires, relays, plug connectors, switches, and various electrical components in the dash. The components were completely destroyed and could not be accurately analyzed.

Because of the degree of destruction that occurred in the engine compartment and the passenger compartment, the melting that occurred to wire strands could not be distinguished between the cause and the effects of the fire.

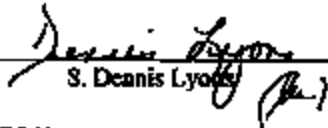
Fire Origin and Cause

The Ford Expedition was extensively burned throughout the front-end and the passenger compartment. The remaining burn patterns show that the fire progressed from the front of the vehicle toward the rear of the vehicle but they do not show the exact origin of the fire within the engine compartment or the passenger compartment. Because of the duration of the fire, most of the combustible materials were consumed, the soft alloys were melted, and the electrical system was destroyed. The fuel lines, the power steering

hoses, and other components containing fluids in the engine compartment were also destroyed. Because of the degree of destruction and the lack of reliable burn patterns, the origin of the fire within the passenger compartment or the engine compartment cannot be determined. Therefore, the cause of the fire cannot be determined.

Mechanical Condition

The engine and transmission were subjected to intense heat. The aluminum components on the upper portion of the engine were melted. The engine could not be cranked by the starter. The motor oil registered within the correct operating level on the dipstick. The oil was clean and was not emulsified with coolant. There was no indication of a mechanical deficiency existing in the engine. The transmission housing was subjected to intense heat. We could not analyze the transmission.


S. Dennis Lyons
SDL/dar

Robert J. Paulino



Photograph 1

Left front view of the 1997 Ford Expedition. There was no evidence of old, unrelated damage at the time of the fire.



Photograph 2

Right front view. Nothing was missing from the Expedition at the time of the loss.



Photograph 3

Right rear view. The Expedition was burned from the front to the rear and throughout the interior undercarriage, and the engine compartment.



Photograph 4

Left rear view. The fire progressed toward the rear of the vehicle at a later stage.



Photograph 5
View of burn patterns appearing on the left side. The left front door was open.



Photograph 6
View of burn patterns appearing on the right side. The doors were closed. The patterns show the fire burned with a longer duration at the front of the vehicle and then progressed toward the rear. Some combustible materials still remained at the rear of the vehicle.



Photograph 7

Overview of the passenger compartment. All combustible materials were consumed and only the steel framework of the seats, the dash, and the steering column remained.



Photograph 8

Overview of the passenger compartment. The left front seat was detached from the floor.



Photograph 9

Another view of the passenger compartment. There were no distinguishable burn patterns remaining in the interior of the vehicle.



Photograph 10

The carpets and insulation were consumed on the rear floors of the vehicle.



Photograph 11

Overview of the center and left side of the dash assembly. All combustible materials were consumed and the alloy components were melted.



Photograph 12

Closer view of the left side of the dash assembly. The instrumentation was destroyed by the fire. Components had fallen onto the floor.



Photograph 13

Overview of the center of the dash assembly. Only the metal components remained. There was scorching to the firewall panel.



Photograph 14

Close view of one of the wiring harnesses extending from the left side of the dash toward the center of the dash. The wires were melted and broken as a result of heat produced by the fire.



Photograph 15

Overhead view of the left side of the dash. The instrumentation cluster was consumed and only partially melted wire strands and metal brackets remained.



Photograph 16

Closer view of the electrical wiring harness located behind the instrumentation panel.



Photograph 17

Overhead view of the right center portion of the dash assembly. The electrical wiring and all electrical components were destroyed by the fire.



Photograph 18

Close view of melted wires in the dash. The wires were melted by the heat of the fire and not by electrical shorting.



Photograph 19
Closer view of melted wires in another portion of the dash.



Photograph 20
Overhead view of the right front floor.

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Photograph 21

Close view of electrical wires that had fallen from the dash. The wires were melted and broken during the fire.



Photograph 22

Another view of damaged electrical wiring in the dash. The cause cannot be distinguished from the effects of the fire.



Photograph 23
Overhead view of the left side of the cowl.



Photograph 24
View of the wiper motor assembly and the electrical wiring harness.



Photograph 25

The aluminum components of the wiper motor were melted, and the wiring was destroyed.



Photograph 26

Overview of the engine compartment. The combustible materials were consumed and the alloy components were melted.



Photograph 27
View of the front of the engine. The aluminum components had begun to melt.

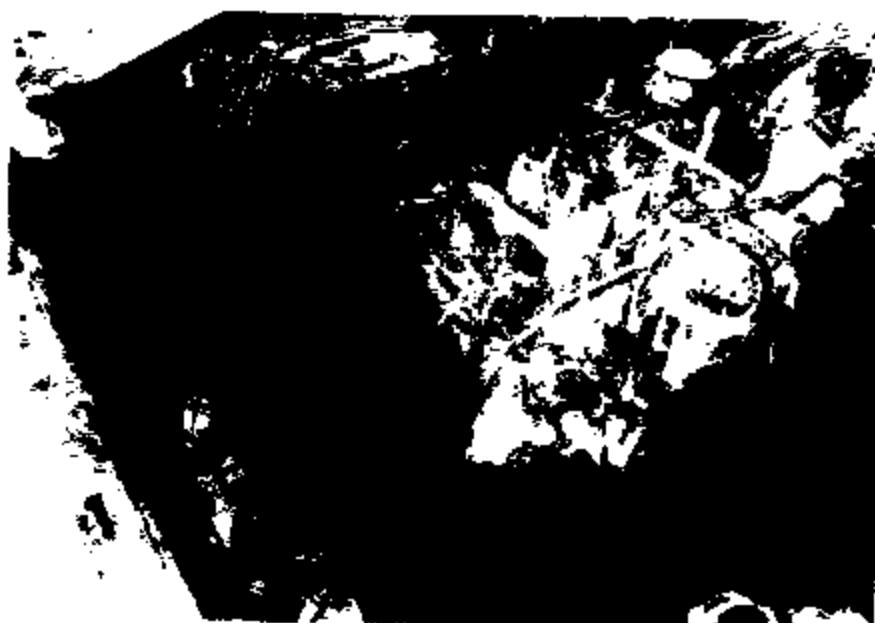


Photograph 28
View of the left side of the engine compartment. The ABS unit and all electrical components were destroyed by the fire.



Photograph 29

Overview of the left side of the engine compartment. There were no distinguishable burn patterns.



Photograph 30

Overview of the right side of the engine compartment. There were no distinguishable burn patterns. The electrical system was destroyed by the fire.



Photograph 31

The fuel system was extensively burned. All of the flex hoses were consumed and only the metal components remained.



Photograph 32

The fuel lines were consumed at the rear of the engine compartment. Only the fuel rail and the injectors remained.



Photograph 33

View of the remains of electrical wiring. The relays, the power distribution panel, and other combustible materials of the electrical system were consumed.



Photograph 34

View of the right rear of the engine compartment. The wires were melted and broken as a result of the heat produced by the fire.



Photograph 35

Another view of the right rear of the engine compartment. There were no distinguishable burn patterns in the engine compartment.

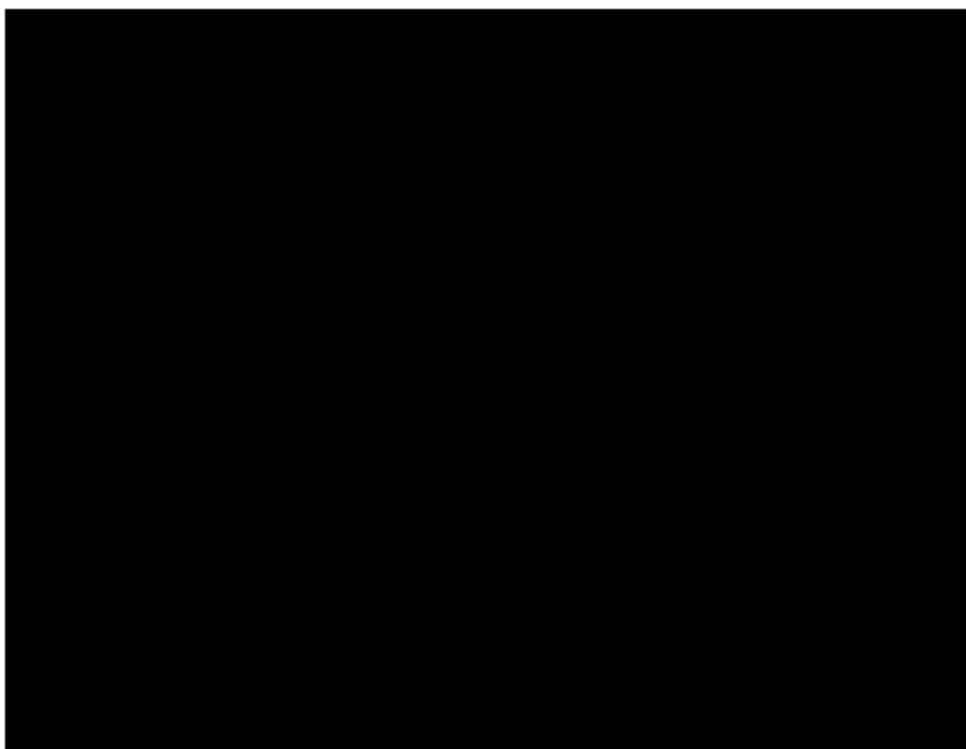


Photograph 36

View of the fuel pressure regulator. It was subjected to intense heat. Due to the degree of destruction, the cause of the fire cannot be determined.



Photograph 37
View of the remains of the VIN.



LAW OFFICES
MONROE DIXON
4345 S.W. 71 AVENUE
SECOND FLOOR, SUITE #B
MIAMI, FLORIDA 33155

Telephone: 305-661-1144

Facsimile: 305-661-3694

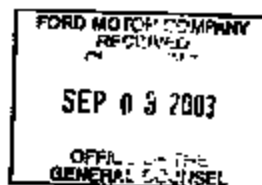
August 25, 2003

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7001 0320 0001 6332 8408

Ford Motor Company
Highland Park Complex
91 Manchester Street
Highland Park, MI 48203

Attn: Legal Department

RE: Case #9908213576



TO SEP-3 19:22
OFFICE OF THE SECRETARY
PETER J. SHERREY JR.

Gentlemen:

I represent [REDACTED] located in Miami, Florida.

My client purchased a 1997 Ford Truck F150, Vin #1FTEX07L3VE [REDACTED] from Lauderdale-Miami Auto Auction on October 15, 2002 for the sum of \$5,780.00. The condition of the vehicle was GL. A copy of the sales ticket and certificate of title are attached.

When my client started the truck to leave the premises, the truck immediately caught on fire and was engulfed in flames. Copies of the police report and fire department report are attached as evidence of the fire and damage.

My client had to have the vehicle towed and stored since that date, pending a resolution of this matter, a copy of the storage receipt is also attached.

After numerous phone calls with promises and no results, from my client to Ford Motor Company and an attorney located in Dearborn, Michigan, Ma. Gomes, my client has referred this matter to me for action.

I would appreciate a representative from your company contacting my office to discuss a settlement of this matter.

Thank you.

Yours truly,

Monroe Dixon
MONROE DIXON

/s/

cc: Barnett Auto Center, Inc.

197 F150
- VIN
- \$5780.-
- 10/15/02
- Miami, FL

RECORD
02

FIRE / PROPERTY RECORD FIRE RESCUE INCIDENT REPORT MAHARAJA COUNTY, FLORIDA

UNIT REPORTING SHIFT
357 A

| | | | |
|------------------------|-------------------------------|------------------------|-----------------------------|
| DEPT | INCIDENT NUMBER | M M D D Y Y | INCIDENT ADDRESS |
| 30 | 2155422 | 102302 | 402 NW 107 AV |
| PROPOSED ADDRESS | TIME REPORTED | | |
| | 2302 | | |
| PROPOSED ADDRESS | MIDDLE INITIAL | PROP SEQUENCE | |
| | | 07 | |
| STRUCTURE TYPE | STORIES & HEIGHT | SQUARE FEET | OCCUPANT TOTAL TYPE & FOUND |
| 8 | 31 | 1 | 11 114 113 |
| OCCUPANT NAME | SPECIFIC PROPERTY | | MOBILE PROPERTY |
| SHALE | 965 | | 11 |
| MUMFLY, FL | | | |
| APPARENT DAMAGE | APPARENT DAMAGE | COND OF FIRE | FLAME TRAVEL |
| OR 1ST UNIT ARRIVAL | WHEN FIRE OUT | ON ARRIVAL | FACTOR |
| 11 | 17 | 5 | 95 |
| DETECTOR TYPE | POWER SUPPLY | PERFORMANCE | SPRINKLER SYSTEM |
| 8 | 8 | 8 | 8 |
| HEADS OPERATED | COVERAGE | | |
| 000 | 8 | | |
| PROPERTY & CASE NUMBER | POWERED TO | TOWING COMPANY | |
| 588140-A | 711 AV NW 54 ST. | BANCORP | |
| 96 FOLD | 150 PU. E/635 FL 17 TEX 0713Y | | |
| EQUIPMENT INVOLVED | TYPE MATERIAL INVOLVED | TYPE MATERIAL INVOLVED | |
| 01 AUTO / PU | 97 MULTIPLE | 97 MULTIPLE | |
| FORM HEAT IGNITION | IGNITION FACTOR | ESTIMATED LOSS | |
| 23 SHOT CNO. | 54 PACE FALLING | 12000 | |
| AREA OF ORIGIN | LEVEL ORIGIN FIRE | CONTENTS | |
| 23 early area | 31 GARAGE 9' | 100 | |

| | | | |
|-----------------|------------------------------|--|-----------------------------|
| INVESTIGATED BY | CALLED TO CONTROL TOTAL LOSS | | WATER SUPPLY TYPE |
| | 90 | | 100 |
| GROUND AERIAL | FIRE RELATED CASUALTIES | | PERSONNEL OF UNIT REPORTING |
| LADDER'S LADDER | FIRE DEPT. SUPPORT OTHER | | FF PAUL-APRIL |
| 152 154 | PERSONNEL PERSONNEL PERSONS | | FF LIVINGSTONE |
| INJURY | DEATH | | FF WILLIAMS |
| 156 158 | 157 159 | | FF ZANE |
| 160 162 | 161 163 | | 107352 |

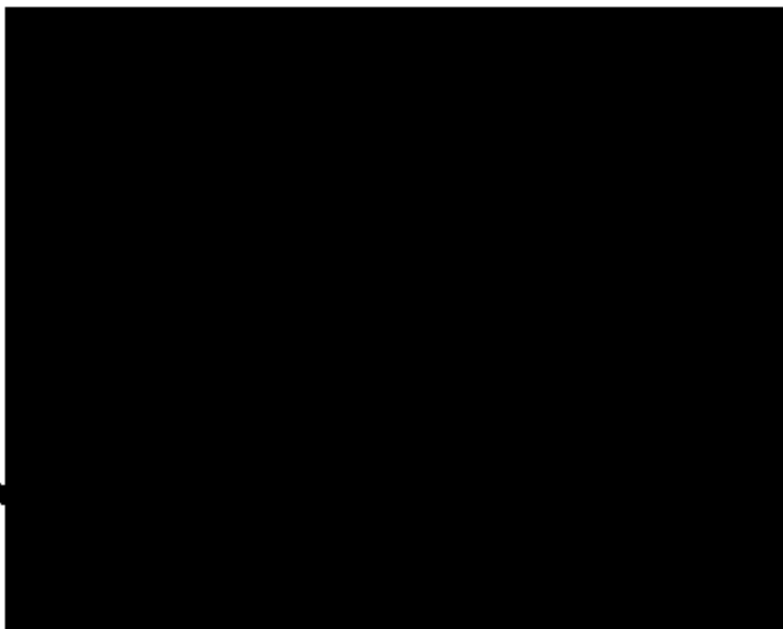
NARRATIVE
3-27-02 FIREMAN ON A FULLY INVOLVED FIRE TRUCKS 1 1/2 LANE EXTINGUISHED
FIRE, DRIVER STAYS IN CAR 15 MIN, (JUST BEFORE) DRIVEN IN THE
MIDDLE OF THE STREET AND TO BE FULLY EXTINGUISHED, LOSS OF THE FIRE
WILL NOW TO BE DONE.

Journal of Management Inquiry 22(4)

~~FOUO-005-LC1-1773~~

VEHICLE/PROPERTY REPORT

| | | | | | |
|---|--|---|--|----------------------------------|--|
| Date of Report | | MIAMI-DADE POLICE DEPARTMENT | | Agency Report Number 588140-A | |
| Original Date Reported 1.0.2.3.2002 | | Primary Owner Description VEHICLE FIRE | | Vehicle Make N/A | |
| Police Code 1. 100 2. 101 3. 102 4. 103 5. 104 6. 105 7. 106 8. 107 9. 108 10. 109 11. 110 12. 111 13. 112 14. 113 15. 114 16. 115 17. 116 18. 117 19. 118 20. 119 21. 120 22. 121 23. 122 24. 123 25. 124 26. 125 27. 126 28. 127 29. 128 30. 129 31. 130 32. 131 33. 132 34. 133 35. 134 36. 135 37. 136 38. 137 39. 138 40. 139 41. 140 42. 141 43. 142 44. 143 45. 144 46. 145 47. 146 48. 147 49. 148 50. 149 51. 150 52. 151 53. 152 54. 153 55. 154 56. 155 57. 156 58. 157 59. 158 60. 159 61. 160 62. 161 63. 162 64. 163 65. 164 66. 165 67. 166 68. 167 69. 168 70. 169 71. 170 72. 171 73. 172 74. 173 75. 174 76. 175 77. 176 78. 177 79. 178 80. 179 81. 180 82. 181 83. 182 84. 183 85. 184 86. 185 87. 186 88. 187 89. 188 90. 189 91. 190 92. 191 93. 192 94. 193 95. 194 96. 195 97. 196 98. 197 99. 198 100. 199 101. 200 102. 201 103. 202 104. 203 105. 204 106. 205 107. 206 108. 207 109. 208 110. 209 111. 210 112. 211 113. 212 114. 213 115. 214 116. 215 117. 216 118. 217 119. 218 120. 219 121. 220 122. 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998 900. 999 901. 1000 902. 1001 903. 1002 904. 1003 905. 1004 906. 1005 907. 1006 908. 1007 909. 1008 910. 1009 911. 1010 912. 1011 913. 1012 914. 1013 915. 1014 916. 1015 917. 1016 918. 1017 919. 1018 920. 1019 921. 1020 922. 1021 923. 1022 924. 1023 925. 1024 926. 1025 927. 1026 928. 1027 929. 1028 930. 1029 931. 1030 932. 1031 933. 1032 934. 1033 935. 1034 936. 1035 937. 1036 938. 1037 939. 1038 940. 1039 941. 1040 942. 1041 | | | | | |



Amica Mutual Insurance Company
Amica Life Insurance Company
Amica General Agency, Inc.

MANCHESTER REGIONAL OFFICE
1750 Elm Street, Suite 200
Manchester, New Hampshire 03104-2999
Mail: PO Box 5223, Manchester, NH 03108-5223



November 13, 2002

Ford Motor Company
Frank M. Ligon
PO Box 1904
Dearborn, MI 48121

RE: Our File: [REDACTED]
Our Insured: [REDACTED]
Date of Loss: 10/30/02
Loss Location: [REDACTED] NH
Type of Loss: Vehicle Fire
Vehicle: 1997 Ford F150
NBFCO File: 3982711

Dear Mr. Ligon,

Please be advised that I represent Amica Mutual Insurance Company and Jeffrey & Nancy Cote. The above referenced vehicle was involved in a fire of as yet undetermined origin that resulted in significant damage to the above-described property.

In order to determine the specific cause of the fire, including a determination as to whether any defect in the vehicle was in existence at the time of the fire, and inspection and testing of the vehicle will be conducted by New England Fire Cause & Origin, Inc., authorized representative of Amica Mutual Insurance Company. This inspection will take place at Car World, 134 Raymond Road, Candia NH ten days from the date of this letter.

As you may have an interest in this matter, both from a safety precaution and as a potential defendant in resultant 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 New England Fire Cause and Origin, Inc. at (800) 675-8500. Should you have any questions pertaining to this matter or wish to discuss the incident in further detail, you may contact the undersigned at phone number (603) 329-1390 ext. 203.

Toll Free: 1-800-925-6422, Web Site: www.amica.com
Claims Fax: (603) 641-0325, Production Fax: (603) 625-0270

NOV 18 2002

10/30/02
S. Concord
197 F-150
-1

EN85-000-LC1-1776

I would like to caution that should your expert fail to appear at this inspection, you will forfeit any right to subsequently claim prejudice/spoliation under Nally vs., Volkswagen of America, Inc. 405 Mass 191 (11989).

Very truly yours,



Rita L. Huot
Claims Department

Cc: NEFCO

1988-005-LC1-1777

LOSS TELEPHONE REPORT

FILE NUMBER: A250208908 INSURED POLICY NUMBER: [REDACTED]
INSURED NAME: [REDACTED]

File # A250208908
Loss Exp. Pulled? Yes

Policy # [REDACTED]
Comp. Ded. 250

INSURED

Claim #: 01
Policy #: [REDACTED]
Insurer: Amica
Name: [REDACTED]
Address: [REDACTED]

BOSCAWEN, NH [REDACTED]

Home Phone: [REDACTED] Mobile Phone: [REDACTED]

Auto description:

Year: 1997 Make: FORD
Model: F150 4X2 SUPERCAB Color: RED
Milage: 12000 Vin: 1FTDX17W0V [REDACTED]
Plate#: 116102 State: NH

Auto Location: JOHN'S TOWING
CONCORD, NH 03301

Damage: VEH. DESTROYED IN ENGINE FIRE
Shop Phone: 225-6266

Operator:

Name: [REDACTED]
Address: [REDACTED]

BOSCAWEN, NH [REDACTED]

DOB/Age: [REDACTED]

License #: [REDACTED] License State: NH

Survey Status: Rush Type of Survey: Comprehensive

ACCIDENT INFORMATION

Loss Date: 10/30/02 Time: 5:30 PM EST

Location: SOUTHBOUND OFF RAMP - 93 SOUTH EXIT 16 CONCORD NH

Description: INSRD STATED ENGINE BEGAN SPATTERING - SMELL OF FUEL
BEGAN TO INTENSIFY AND STEAM WAS COMING FROM HOOD -
INSRD PULLED OVER TO LOOK UNDER HOOD - DID NOT SEE ANY
LEAKS, RESTARTED VEH. AND ENGINE IGNITED - FLAMES
COMPLETELY ENGULFED VEH DUE TO RESPONSE TIME FROM FIRE
DEPT. - INSRD ATTEMPTED TO EXTINGUISH FIRE WITH
EXTINGUISHER

Report Made? No

Comments: DISCUSSED COVERAGES W/INSRD - 250 OTC DED, 30/900 RENTAL -
INSRD HAD PASSERBY CONTACT 911, INSRD ATTEMPTED TO
EXTINGUISH FIRE WITH FIRE EXTINGUISHER - FIRE STARTED
SMALL BUT DUE TO LONG RESPONSE TIME FROM FIRE DEPT - FIRE
HAD COMPLETELY ENGULFED AND DESTROYED VEH. - ADVISED INSRD

LOSS TELEPHONE REPORT (Continued)

FILE NUMBER: A250208908 INSURED POLICY NUMBER: [REDACTED]
INSURED NAME: [REDACTED]

TO OBTAIN REPORT FROM FIRE DEPT - INSRD DID NOT KNOW WHERE
VEH SHLL HAD BEEN TOWED AND WILL ADVISE BRANCH WHEN THEY
CONTACT - INSRD STATED THAT HE HAD RECENTLY RECEIVED A
RECALL FROM FORD FOR FUEL LINE PROBLEMS - INSRD WAS TAKING
VEH. TO DEALER THIS EVENING - ADVISED INSRD OF FILE NUMBER
AND BRANCH WILL CONTACT SPOKE TO JEFF COTE HE GAVE ME
LOCATION OF IV, HAVE ORDERED RUSH APPR TODAY, CALLED SHOP
CHARGES RIGHT NOW STAND AT 285.00 NO STORAGE YET. SPOKE TO
HARRY ADVISE TO CALL CAR WORLD TO PICK UP EITHER LATE
TODAY OR ON FRI. INS HAS GIVEN PERMISSION TO MOVE VEH IS
97 FORD F150 4.X2 VIN # 1FTDX17W0VK [REDACTED] FILE HANDLER
RITA HUOT

Reported by: JEFFREY COTE
Taken by: A12574
Date: 10/30/02 Time: 6:45 PM EST Office: 25
Written report requested: No

INSURED INVOLVED PARTIES

Name: NONE

Passenger/Pedestrian/Driver: Other
Injured? No Admitted? No Doctor: No
Doctor:

TOTAL LOSS INFORMATION

Engine Size: 4.6 No Cylinders: 8
Tires: GENERAL GRABBERS 70 16 Mileage: 12000
Purchased from: AUTO FAIR FORD - MANCHESTER, NH
Date of Purchase: 7/1/00 Purchase Price: 9500
Color of Vehicle: RED
Condition of Interior: EXCELLENT
Condition of Exterior: EXCELLENT - NORMAL WEAR AND TEAR
Mileage: 12000 Transmission Type: AUTOMATIC
Power Steering: Yes Power Brakes: Yes Air-Condition: Yes
Vinyl: No Radio: Yes Stereo Tape: Yes
Other: No

Give Printout To: Rita Huot
Date/Time Of Print: 10/31/02 9:09:30 AM
Page: 2

(Last Page)

FORM-305-LC1-1778

ATTN: RETA

INCIDENT REPORT
City of Concord

A

| FILED | INCIDENT NO | EXP NO | MO | DAY | YR | DAY OF WEEK | ALARM TIME |
|-------|-------------|--------|----|-----|----|-------------|------------|
| 00010 | 02-005287 | 00 | 10 | 30 | 02 | Wednesday | 17:04:00 |

NARRATIVE

Called for vehicle fire. On arrival found a pickup truck fully involved. We stretched an 1 3/4 line and began extinguishing the fire. There was some sort of flammable metal burning in the passenger compartment, we used a dry chem and a Co2 with little success. We were able to shovel out the remaining metal and finish the extinguishment.

The owner of the pickup said he was on his way to drop the vehicle off for some recall work on the fuel line. It was running poorly and he pulled over to check some steam from under the hood, it dissipated and when he got back in and started it up "it ignited". The fire appeared to be in the rear of the engine compartment on the drivers side. He used a small extinguisher through the wheel well, that only darkened it down for a moment. He believes that when he evacuated the vehicle that he did not have time to shut it off.

11/01/2002 13:19 Brian Saltmarsh

7-11-02 10:10:00

ATTN: KITA

RESPONDING UNITS City of Concord

| FOID | INCIDENT NO | EXP NO | MO | DAY | YR | DAY OF WEEK | ALARM TIME |
|-------|-------------|--------|----|-----|----|-------------|------------|
| 00010 | 02-005267 | 00 | 10 | 30 | 02 | Wednesday | 4 17:04:00 |

| UNIT CODE | RESPONSE CODE | ALARM | ARRIVAL | RESPONSE |
|-------------|---------------|----------|----------|----------|
| M5 Engine 5 | 1 Emergency | 17:04:00 | 17:08:00 | 00:05:00 |
| X6 Rescue 5 | 1 Emergency | 17:04:00 | 17:08:00 | 00:05:00 |

TOTAL UNITS: 2

ATTN: RITA

INCIDENT REPORT
City of Concord

NFIRS-1

[] DELETE
[] CHANGE

| | | | | | | | | | | | |
|---|---|--------------------------|--------------------------|----------|--------------------------|----------|--|-----------------|----------------------------------|-------------------------|------------------------|
| A | FORM NO 00010 | INCIDENT NO 02-093267 | EXP NO 00 | MO 10 | DAY 30 | YR 02 | DAY OF WEEK Wednesda | ALARM TIME 4 | ARRIVAL TIME 17:04:00 | IN SERVICE 17:09:00 | IN SERVICE 20:03:00 |
| B | TYPE OF SITUATION FOUND Vehicle Fire | | | | | | TYPE OF ACTION TAKEN Extinguishment | | MUTUAL AID 1 Race Green | | |
| C | FIXED PROPERTY USE Limited Access/Divid Hwy | | | | | | IGNITION FACTOR 001 | | 00 | | |
| D | CORRECT ADDRESS exit 18 off ramp Penacook, NH | | | | | | CO. 330 | TWN | ZIP CODE | CENSUS TRACT 0001.29 | |
| E | OCCUPANT NAME | | | | | | TELEPHONE | | ROOM/APT NO | | |
| F | OWNER NAME | | | | | | ADDRESS | | TELEPHONE | | |
| G | METHOD OF ALARM FROM PUBLIC Telephone Tls Line | | | | | | TYPE OF ALARM 7 | DISTRICT 701 | SHIFT 2 | STATION 6 | NO. ALARMS 1 |
| H | 911 USED E911 | | PERSONNEL RESPONDED 2 | | ENGINES RESPONDED 005 | | AERIAL APPARATUS 000 | | OTHER VEHICLES 001 | | |

| | | | | | | | | |
|---|---------------------------------------|--|-----------|--|--|--|-----------|--|
| I | NUMBER OF INJURED FIRE SERVICE 000 | | OTHER 000 | | NUMBER OF FATALITIES FIRE SERVICE 000 | | OTHER 000 | |
|---|---------------------------------------|--|-----------|--|--|--|-----------|--|

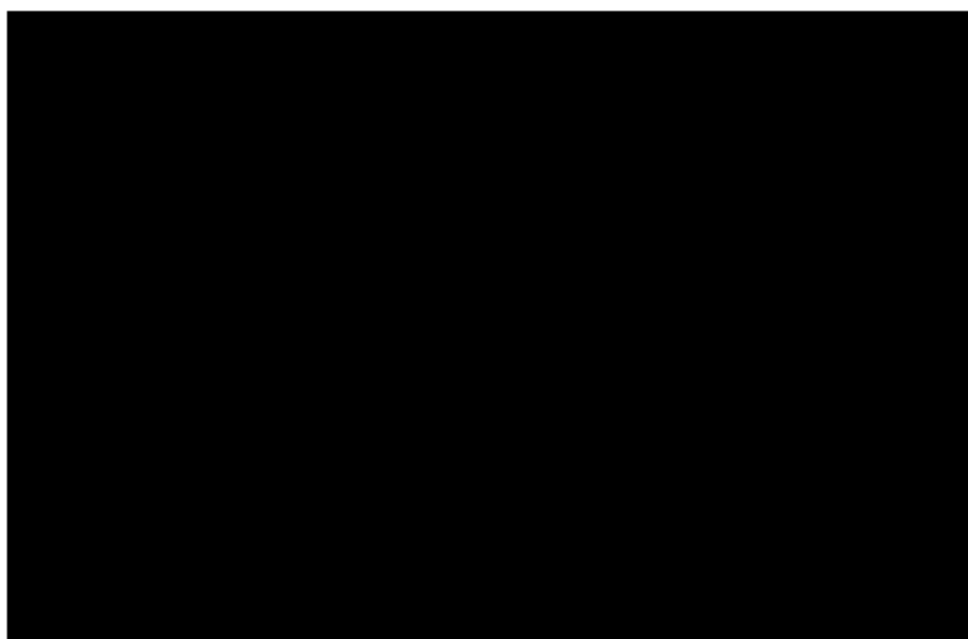
| | | | | |
|---|---|--|--|--|
| J | COMPLEX No Complex | | MOBILE PROPERTY TYPE Automobile | |
| K | AREA OF FIRE ORIGIN Engine Area, Running Gear | | EQUIPMENT INVOLVED IN IGNITION 00 | |
| L | FORM OF HEAT OF IGNITION Undetermined | | TYPE OF MATERIAL IGNITED Undetermined | |
| M | METHOD OF EXTINGUISHMENT Preconnect w/Tank Water | | LEVEL OF FIRE ORIGIN Grade to +0' | |

| | | | | |
|---|---|--|--|--|
| N | NUMBER OF STORES | | CONSTRUCTION TYPE | |
| O | EXTENT OF FLAME DAMAGE | | EXTENT OF SMOKE DAMAGE | |
| P | DETECTOR PERFORMANCE | | SPRINKLER PERFORMANCE | |
| Q | IF SMOKE SPREAD BEYOND ROOM OF ORIGIN | | TYPE OF MATERIAL GENERATING MOST SMOKE | |
| R | | | AVENUE OF SMOKE TRAVEL | |

| | | | | | | |
|---|--------------------------------------|------------|--------------|--------------------|------------|-------------------|
| S | IF MOBILE PROPERTY | YEAR 97 | MAKE Ford | MODEL F-150 4X2 | SERIAL NO. | LICENSE NO. NH |
| T | IF EQUIPMENT INVOLVED IN IGNITION | YEAR | MAKE | MODEL | SERIAL NO. | |

[X] CHECK IF COMMENTS

| | | |
|---|--|--------------------|
| U | OFFICER IN CHARGE (NAME, POSITION, ASSIGNMENT) Submarsh. Brian J. Leuterant | DATE 10/31/2002 |
| | MEMBER MAKING REPORT OF DIFFERENT FROM ABOVE) Submarsh. Brian J. Leuterant | DATE 10/31/2002 |





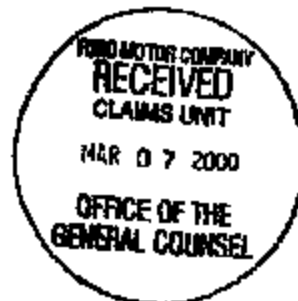
INTERINSURANCE EXCHANGE of the

Automobile Club of Southern California

PROCESSING CENTER: P.O. BOX 25024 * SANTA ANA, CALIFORNIA 92799-5024

February 4, 2000

FORD MOTOR COMPANY
OFFICE OF THE GENERAL COUNCIL
PARKLANE TOWERS WEST
#1 PARKLANE BLVD. #1513
DEARBORN, MI 48126



RE: OUR INSURED:
OUR FILE NO:
LOSS OF:

7-21-99

DEAR SIR/MADAM:

OUR INSURED AS CAPTIONED ABOVE PURCHASED A USED 1998 FORD F 150 PICK UP TRUCK, VIN # 1FTZX176XW1 [REDACTED] ON JULY 21, 1999. ON AUGUST 10, 1999 THE VEHICLE HAD AN ENGINE FIRE WHICH DESTROYED THE ENTIRE VEHICLE.

[REDACTED] WAS DRIVING THE VEHICLE AND ATTEMPTING TO ENTER LANES OF TRAVEL ON THE FREEWAY AT A SPEED OF 30-40 MPH HE HEARD A LOUD NOISE FROM THE ENGINE COMPARTMENT. HE IMMEDIATELY PULLED OVER AND THE VEHICLE WAS ON FIRE. THE VEHICLE WAS STILL UNDER THE NEW CAR WARRANTY AT THE TIME OF THE FIRE.

WE HAVE SETTLED THE TOTAL LOSS WITH OUR INSURED, AND ARE LOOKING TO THE FORD MOTOR COMPANY FOR REIMBURSEMENT OF OUR EXPENDITURES. WE WILL, OF COURSE, MAKE THE VEHICLE AVAILABLE TO A REPRESENTATIVE OF YOUR COMPANY. WE ALSO EMPLOYED THE SERVICES OF AN INDEPENDENT ENGINEER WHO HAS ADVISED US OF THE RECALL NOTICES FOR THIS VEHICLE.

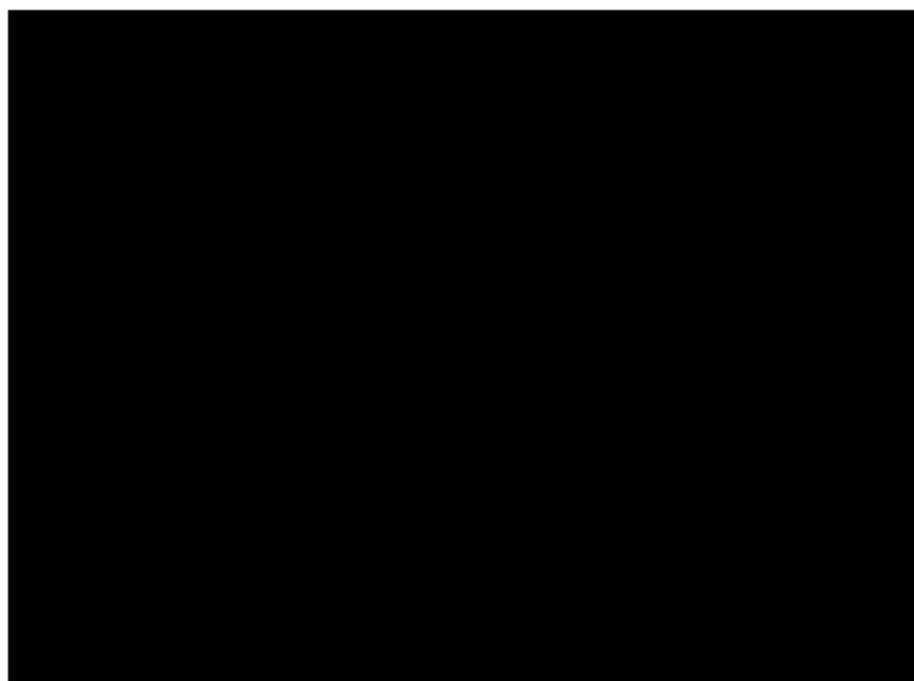
PLEASE ADVISE TO WHOM I SHOULD DIRECT MY SUBROGATION DEMAND TO. I LOOK FORWARD TO AN EARLY RESPONSE TO MY CORRESPONDENCE.

SINCERELY,


CLAUDIA BYINGTON
SUBROGATION DEPT
(714) 550-5481

CB:c

ERES-685-LC1-1783



CARROLL COUNTY RURAL VOLUNTEER FIRE DEPARTMENT INCIDENT REPORT

STATE FARM
INSURANCE COMPANIES

FEB 14 2002

Date 2-6-02

Station 8

Incident Response ☒ M ☐ M

JACKSON CLAIMS
OFFICE

| | | |
|---------------|---|----|
| Call Received | 2 | 02 |
| In-Service | 4 | 00 |
| Arrived Scene | 4 | 09 |
| AWA Request | | |
| Depart Scene | 4 | 35 |
| Available | 4 | 56 |

| |
|--|
| Write Service Unit: <u>Engine</u> |
| Appropriate Calling Unit: <u>200</u> |
| Incident Command(s): <u>R. McFarland</u> |
| Report Filed By: <u>R. McFarland</u> |

| |
|---|
| <input type="checkbox"/> Structure <input type="checkbox"/> AWA Standby <input checked="" type="checkbox"/> Engine(s) |
| <input type="checkbox"/> Vehicle <input type="checkbox"/> AWA Fire <input checked="" type="checkbox"/> Tanker(s) |
| <input type="checkbox"/> Truck <input type="checkbox"/> False Alarm <input type="checkbox"/> Other |
| <input type="checkbox"/> Haz-Mat <input type="checkbox"/> Disregard |
| <input type="checkbox"/> Other |

| | |
|---|-----------------------------------|
| To be filled out by Incident Command Only | |
| <input type="checkbox"/> Police | <input type="checkbox"/> R.M.B. |
| <input type="checkbox"/> Haz-Mat Team | <input type="checkbox"/> All Vets |
| <input type="checkbox"/> E.M.A. | <input type="checkbox"/> Forestry |
| CCFD Station | |

Incident Location: [Redacted] Incident Station: 8
Owner Name: [Redacted] Service Name: [Redacted]
Company Address: [Redacted] Contact Person: [Redacted]

| | |
|---|-----------------------------|
| Insured Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> | Vehicle Make <u>Ford</u> |
| Company Name | Vehicle Model <u>F-150</u> |
| Address | Vehicle Year <u>1997</u> |
| City/State/Zip | VIN Number <u>n/a</u> |
| Coverage | License # <u>[Redacted]</u> |
| Estimated Loss % | |
| Smoke Detectors | |
| Yes <input type="checkbox"/> No <input type="checkbox"/> | |
| Detector Performance | |
| Yes <input type="checkbox"/> No <input type="checkbox"/> | |

| | |
|--|---------------|
| Acces Involved | Action Taken: |
| Structure(s) Damaged | |
| Yes <input type="checkbox"/> No <input type="checkbox"/> | |

Personnel responded: P. Taylor, L. McFarland, C. Byrd, B. Smith, L. Smith
T. Taylor, B. McFarland
Comments:

Version 0001



ERG5-855-LC1-1785



EA95-885-LC1-1785



ERG5-005-LC1-1787



ERG5-005-LC1-1786

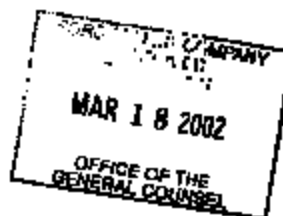


ER25-865-LC1-1788

State Farm Insurance Companies



May 16, 2001



Claim Office
P.O. Box 10008
Jackson, TN 38306-0101
Phone: 731-664-1200
FAX: 731-664-1295 (Fire Co.)
731-664-1295 (Auto Co.)

Ford Motor Company
Parklane Towers West
Suite 400
3 Parklane Blvd
Dearborn, MI 48126-2588

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Vehicle: 1997 Ford F150
VIN: 1FTDX08W7VK [REDACTED]
Owner: [REDACTED]
Date of Loss: February 8, 2002
Claim #: 42-1450-075

To Whom It May Concern:

Please be advised that I represent State Farm Insurance Company. The above vehicle was involved in a total fire loss, which came from the engine area. The fire occurred on 2-8-02 at [REDACTED] in Hollow Rock, TN.

In order to determine the cause of the fire, including a determination as to whether any defect in the vehicle was in existence at the time of the fire, Mr. R. J. Hill will conduct an inspection and testing of the vehicle. This inspection will take place at our storage lot in Jackson, TN at 9 a.m. on April 22, 2002.

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 me at 731-664-1277 or Mr. Hill at 615-223-7738. Should you have any questions pertaining to this matter, or wish to discuss the same in further detail, you may contact me.

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 American, Inc., 405 Mass 191 (1989).

Sincerely,

Christina Sumner
Claim Specialist

HOME OFFICE: BLOOMINGTON, ILLINOIS 61710-0001

ENR6-005-LC1-1798





Stuart Allan & Associates, Inc.

Les Howard
Senior Claims Handler

The Stuart Allan Building
5447 East 5th Street, Suite 170
Tucson, Arizona 85711-2345

520.851.5900 ext. 264
520.325.0102 Facsimile

www.stuartallan.com

March 21, 2002

Ford Motor Company
Attn: Claims
Parklane Towers West #300
3 Parklane Blvd.
Dearborn, MI 48126

RE: Subrogation Package

Your Claim Number [REDACTED]
Your Insured [REDACTED]
Date of Loss : November 27, 2000
Claimant : MetLife Auto & Home
Claimant's Insured : [REDACTED]
Our Claim Number : 815194-53
Amount of Claim : \$18260.18

Diane Douglas

To Whom It May Concern:

Enclosed please find a subrogation package for the above referenced loss. Stuart Allan & Associates, Inc. represents the interests of the above named claimant, and in the capacity as authorized agent, we formally request that full payment for this claim be paid to the claimant through our office at the address indicated above. When remitting payment, indicate our claim number on the remittance. Please acknowledge receipt of this package.

| | | | |
|----------------------|------------|---|------------------------|
| Total Loss Breakdown | \$18160.18 | - | Collision / Total Loss |
| | 100.00 | - | Deductible |
| | \$18260.18 | - | Property Damage Total |

The vehicle is currently in storage at Copart - phone 630-497-8343 - stock #7354390 - If you need to inspect it. There are also color photos available should you need them. Please review and contact me.

Thank you for your prompt attention to this matter.

Sincerely,

STUART ALLAN & ASSOCIATES, INC.

Les Howard
Les Howard
Senior Claims Handler

LH: cp

40,250M

This is an attempt to collect a claim. Any information obtained will be used for that purpose.
This communication is from a professional debt collector.

EA05-005-LC1-1701

Claim#

 LINCOLN STATE POLICE
INCIDENT REPORT

| | | | | |
|---|--|--|---|------------------------|
| 1. Type of Report 1. Initial Report 2. Change of Status of Report | 2. Date 11-00-13564 2. Date 11/27/00 Time 7:48 | 3. Incident Location Date 11/27/00 Time 7:48 | 4. Incident Description Date 11/27/00 Time 7:48 | 5. Number 21-000918 |
| 6. TYPE OF REPORT 1. Initial Report 2. Change of Status of Report | 7. Major MP Initially Notified 1. As Motorist 2. As Person 3. Other Agency 4. Telephone 5. U.S. Mail 6. E.M. Radio | 8. SYMBOL 1. Vehicle 2. Condition 3. Completion | 9. Driver OP. Driver D. Other | |
| 10. Brief Description CAR FIRE | | | | |
| 11. Location 1-57 N/A MP 296 City N/A County/Township IRONQUITS/GEORGETOWN | | | | |
| 12. Name - Last, First, Middle [REDACTED] | | | | |
| 13. Home Address 422-37 N. SICKONY, MASTERC. IL [REDACTED] | | | | |

VEHICLE OR BOAT INFORMATION

| | | | | | | |
|------------------------|---------------|----------------------------|-----------------------------|--------------------------|------------------|-----------------------|
| 1. Color WHITE | 2. Year 98 | 3. Mfg. Trade Name FORD | 4. Description Make FORD | 5. License No. 310FSE | 6. Year 02/1A | 7. VIN 1FT2W18A121 |
| 8. Other [REDACTED] | | | | | | |

NARRATIVE

THE PURPOSE OF THIS REPORT IS TO DOCUMENT A CAR FIRE ON I-57 N/A MP 296.

ON 11/27/00 AT 7:48 PM, DISTRICT 21 RADIO NOTIFIED ME OF A CAR FIRE ON I-57 N/A MP 296. UPON ARRIVING, I OBSERVED A WHITE FORD F150 PICKUP (1A-310FSE) PULLED OVER TO THE RIGHT SHOULDER OF THE INTERSTATE FULLY ENVELOPED IN FLAMES. AFTER FINDING THAT NO ONE WAS IN THE PICKUP, I SPoke WITH THE DRIVER, [REDACTED] (M. 10/05/61). [REDACTED] STATED THAT HE WAS TRAVELING N/A ON I-57 WHEN HE NOTICED A SMALL AMOUNT OF SMOKE COMING FROM THE TAPE DECK OF THE PICKUP. [REDACTED] STATED THAT HE PULLED OVER TO THE SHOULDER AND RELEASED THE HOOD TO INVESTIGATE. DODGLES SAID THE ENGINE WAS ON FIRE WHEN HE CHECKED UNDER THE HOOD. CHERANGE TOWNSHIP FIRE WAS CALLED AND ARRIVED TO PUT THE FIRE OUT. HOFF'S SERVICE CENTER ARRIVED TO REMOVE THE VEHICLE (21-00-945). I RESUMED ROUTINE PATROL.

| | | | | | |
|--|--|---|------------------------------|----------------------|------------------------------|
| 9. Reporting Officer (Last, First, Middle) TFR. BROWN, BOBBY D. | | 10. Date 11/27/00 | 11. Signatures [REDACTED] | 12. Date 11/27/00 | 13. Signatures [REDACTED] |
| 14. Signatures of Reporting Officer [REDACTED] | | 15. Signatures of Other Parties [REDACTED] | | | |

N. 003-0250

Distribution

Original to Clerk

Copy to District

IMP 2-178 (7-00)

1 217 453 2410

PAGE.03

NOV 28 '00 18:20



Engineering and Fire
Investigations

303 Quadrangle Drive
Suite 303
Bolingbrook, IL
60440
T: 630-679-1503
T: 800-693-2085
F: 630-679-1535

REPORT NUMBER ONE & FINAL

December 17, 2000

PREPARED FOR: MET LIFE FIRE & CASUALTY
P.O. BOX 45
REDDICK, ILLINOIS 60961

ATTENTION: MIKE GRAF

INSURED:

DATE OF LOSS: November 27, 2000

LOSS LOCATION: Buff's Service Center
Clifton, Illinois

POLICY NUMBER: N/A

CLAIM NUMBER:

EFI FILE NUMBER: 94508-00262

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

December 19, 2000

Insured: [REDACTED]

ASSIGNMENT:

The assignment was received on December 1, 2000 with instructions to conduct an origin and cause investigation on a 1998 Ford F 150 pick-up truck.

The assignment commenced on December 4, 2000.

ENCLOSURES

1. Vehicle Exam Worksheet
2. 29 Color photographs
3. Photographic Identification sheet
4. 1 Diagram
5. All photographic negatives
6. Additional Materials Envelope

Neither EFL nor I retain possession of any film photographs, negatives or videos.

VEHICLE DESCRIPTION - VEHICLE EXAMINATION

The vehicle examination was conducted on December 4, 2000 at Buff's Service Center, 205 Main St., Clifton, Illinois.

The vehicle was photographed and a field diagram was completed at that time.

Present during the scene investigation intermittently was Gary from Buff's Service Center

The vehicle was a White, 1998, Ford F 150 Pick-up truck, bearing Iowa License Plate number 310 FSX and a VIN number was confirmed as 1FTZF1868W [REDACTED]

The odometer was not readable due to damage from the fire.

Insured [REDACTED]

The inspection sticker was not discernible due to fire damage.

There were no alterations noted to the vehicle.

There were no adverse conditions affecting the examination.

The above conditions did not prevent an accurate determination of cause.

The security of the vehicle is not an issue since it was being operated by Adam Douglas at the time of the fire.

The evidence indicates the doors were not locked at the time of the fire.

The evidence indicates the windows were broken at the time of the fire.

The evidence indicates the doors and windows were not open at the time of the fire.

The engine compartment suffered the greatest fire damage.

The doors were closed for the majority of the time during the course of the fire.

The front tires were partially fire damaged while the rear tires were undamaged and serviceable. There were no indications the tires or wheels had been recently removed or exchange. The spare was in the normal location and was serviceable.

No pre-fire exterior trauma or accident damage was found.

The entire passenger compartment was gutted by the fire.

The keys were not found in the vehicle.

All the equipment and accessories were original factory installation and there was no evidence that any of the items had been removed.

The equipment remaining in the passenger compartment includes some books and other items normally found in the passenger compartment.

The seats and fabric were consumed by the fire.

Insured: [REDACTED]

All of the carpet was totally damaged by the fire.

The rubber pads were melted off the pedals.

The shift lever was totally consumed by the fire and its gear position could not be determined.

The emergency brake was set.

There were no personal items noted in the vehicle, except for the normal miscellaneous contents typically found in the glove compartment.

The hood was totally consumed by the fire.

The vehicle had an eight (8) cylinder normal mounted engine and had four (4) wheel drive.

The air filter was consumed by the fire.

The upper canister end of the air intake tube was burned away.

The rubber components of the supply and return fuel line including the in-line filter were consumed. The extent of damage of components to the fuel system prevented any determination of existing loose connections from either normal conditions or intentional tampering.

The engine compartment emission system components were damaged.

The radiator and fan was totally melted.

The upper and lower radiator hoses were consumed.

The shroud was not intact.

The inner fenders were in place and damaged. There was heavy fire and heat damage to both inner fenders. The heaviest of which was located at the driver's side.

The dipstick for the engine oil was burned and could not be withdrawn at the time of my investigation. No engine oil leak was noted.

Insured: [REDACTED]

The transmission fluid dipstick was also consumed by the fire and could not be read. The transmission coolant lines to the radiator were melted from the fire.

The power steering pump and reservoir were consumed.

The spark plugs and spark plug wires were not intact.

Examination of the motor mounts revealed they were intact on both sides of the engine.

There did not appear to be any parts missing.

There was evidence of electrical activity and/or involvement to the wiring harness along the dashboard and through the firewall into the engine compartment.

Examination revealed:

Evidence of arcing and/or shorting, an overload to the circuits associated with the wiring harness.

Examination of the fuse panel showed it to be totally consumed by the fire.

The battery was in place and was located on the passenger side at the front of the engine compartment.

The battery was consumed by the fire

The cables were no longer attached to the battery terminals and the connectors and cables exhibited evidence of extreme heat stress.

The alternator was intact and mounted and exhibited evidence of heat and fire damage.

The wiring to the alternator was attached and exhibited evidence of heat stress, heat and fire damage.

The starter exhibited evidence of heat stress and was mounted.

The wiring to the starter was attached and exhibited evidence of heat stress.

Insured: [REDACTED]

The wiring harness was examined and evidence of a failure and/or arcing was noted in the passenger compartment in the dashboard location.

The fuel tank, filler assembly and filler cap had no involvement in this fire.

The gas cap and filler assembly were intact.

The fuel lines were totally consumed.

The fuel injection assembly exhibited evidence of heat and fire damage.

The exhaust system and catalytic converter were in place and functional.

The fire originated in the engine compartment on the driver's side.

The fire spread from the engine compartment to the passenger compartment.

The heaviest heat damage was located in the engine compartment on the driver's side.

There was evidence of arcing on the wiring harness, which ran from the engine compartment through the firewall and into the passenger compartment.

A passerby driving behind the vehicle on the expressway first witnessed the fire.

Available heat/possible ignition sources located in the origin area include:

Vehicle primary electrical wiring,

The vehicle primary electrical wiring at the battery, starter, or alternator exhibited no evidence of electrical activity or malfunction.

No evidence of a fuel line leak was noted.

The integrity of the fuel tank was intact, with no evidence of a rupture, tear or split seam.

The patterns are not indicative of the release and subsequent ignition of atomized transmission or power steering fluid.

Insured: [REDACTED]

There was no evidence of an automatic transmission fluid leak that could be associated with the initiation or spread of this fire.

There was no evidence of a coolant leak. There were no burn patterns indicative of a fire initiated by a coolant leak.

The power steering hoses and fluid reservoir were intact and no evidence of a leak was noted.

The burn patterns were not indicative of a fire involving misuse of smoking material or misuse of open flame.

There was no evidence to indicate incendiary.

There were no ignitable liquids, other than those typically associated with this vehicle.

There was beading and/or arcing on the wiring harness that started in the engine compartment and went through the firewall and into the passenger compartment. This could not be eliminated as a cause of this fire and will need to be examined by an electrical engineer to determine the specific cause of this failure.

This vehicle has been serviced at Don McClain Ford, Inc. 222 Locust Street (Route 50), Manteno, Illinois, 60950, (815) 468-6566, since July 27, 2000. (Service forms available upon request).

INVESTIGATION

I spoke to [REDACTED] insured, and she informed me that her fiancé was driving the vehicle at the time of the fire. He was coming home from work and another vehicle informed Adam, her fiancé, that there has been smoke coming from under the engine for the past 5 miles. When Adam pulled off the road and stopped the vehicle he opened the hood, he saw fire on the drivers side of the engine near the firewall and then it totally engulfed the remaining engine compartment within a minute.

[REDACTED] stated that she has had problems with the vehicle since she bought the truck in 1999 in Omaha, Nebraska. She bought the truck from H.P. Smith Ford, and transferred service to Schrder Ford, in Omaha, Nebraska.

Insured: [REDACTED]

Just prior to being informed about the fire by the other vehicle, he noticed that the truck was losing power and then saw smoke coming from the tape deck and the vents.

On or about December 7, 1999 she was having problems with the engine smoking and dripping oil. "Derek Barnes" from Schrier Ford told her that she should "drive the car until it blows, then it will be covered by warranty". She was also having some problems with the electrical system and some of its components, as well as the truck being sluggish.

The truck had 26,000 miles on it at the time.

In July 2000 she took the truck in for service at Don McClain Ford, Mantino, Illinois for an oil change and an electrical problem. Repairs were made and the problem seemed corrected.

On September 20, 2000 she took the truck back to Don McClain Ford due to a number of problems. At that time, they replaced the fuel tank, and fixed electrical problems. (Invoices available upon request).

DETERMINATION OF CAUSE AND ORIGIN

This is an accidental fire.

The fire originated at the firewall in the engine compartment.

The available evidence indicates the fire was caused by an electrical malfunction in the engine compartment.

An examination by an electrical engineer of the electrical system and wiring harness would be needed to determine the specific cause of the malfunction/failure.

Evidence available to establish origin:

Burn patterns, location of heaviest damage, location of heaviest heat stress, location of arcing, witness testimony,