

84508-00262

Insured: [REDACTED]

December 19, 2000

Evidence available to establish cause:

Burn patterns,

Damage to components, elimination of other causes, witness testimony

All other mechanical and natural causes have been eliminated.

#### COMMENTS

Per your instructions at the conclusion of my verbal report this file will be placed in a closed status with the understanding it can be reopened at your request.

Keith W. Contant, C.F.I.  
Investigator  
Illinois/Missouri Service Center  
(630) 679-1505

KC/pk  
Encl.  
Closed

Reviewed by: *AT Rucci*

Date: *12.28.00*

94608-00262

December 19, 2000

Insured [REDACTED]

### PHOTO IDENTIFICATION SHEET

1. Front of truck
2. Passengers side of truck
3. Rear of truck
4. Drivers side of truck
5. Rear license plate
6. Drivers side front tire and wheel
7. Passengers side front tire and wheel
8. Fuel filler cap
9. Burnt VIN plate
10. Top view of the engine compartment
11. Battery on the passengers side of engine compartment
12. Battery terminal and connection
13. Passengers side of engine
14. Alternator and cable on the passengers side of engine
15. Drivers side of engine
16. Close-up of module on the front of engine on the drivers side
17. Power steering pump and drivers side of engine compartment
18. Power steering pump and wiring harness from the interior of truck
19. Close-up of frayed wires from the harness

ERM5-805-LC1-1882

94508-00282

December 19, 2000

Insured: [REDACTED]

20. Passenger compartment of the truck, dashboard area
21. Drivers floorboard
22. Passengers floorboard and shifter lever
23. Fuse panel under the dashboard
24. Close-up of the fuse panel
25. Wiring harness under the dashboard by the drivers side firewall
26. Beaded wiring at the end of the wiring harness
27. Close-up of the beaded wiring
28. Close-up of the beaded wiring

**EFI**

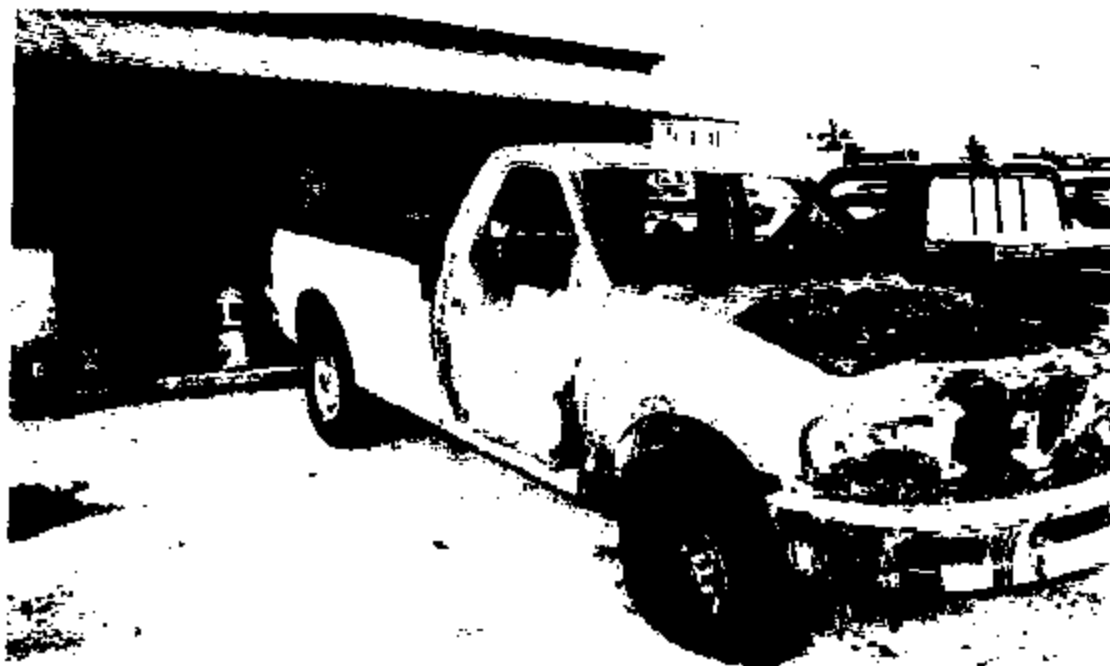
**PHOTO SHEET**

EFI No. 04502-00762

APPROX DATE 1/19/77



No. 1



No. 2

EFI

PHOTO SHEET

EFI No. 94508-00262

Insured. None



No. 3



No. 4

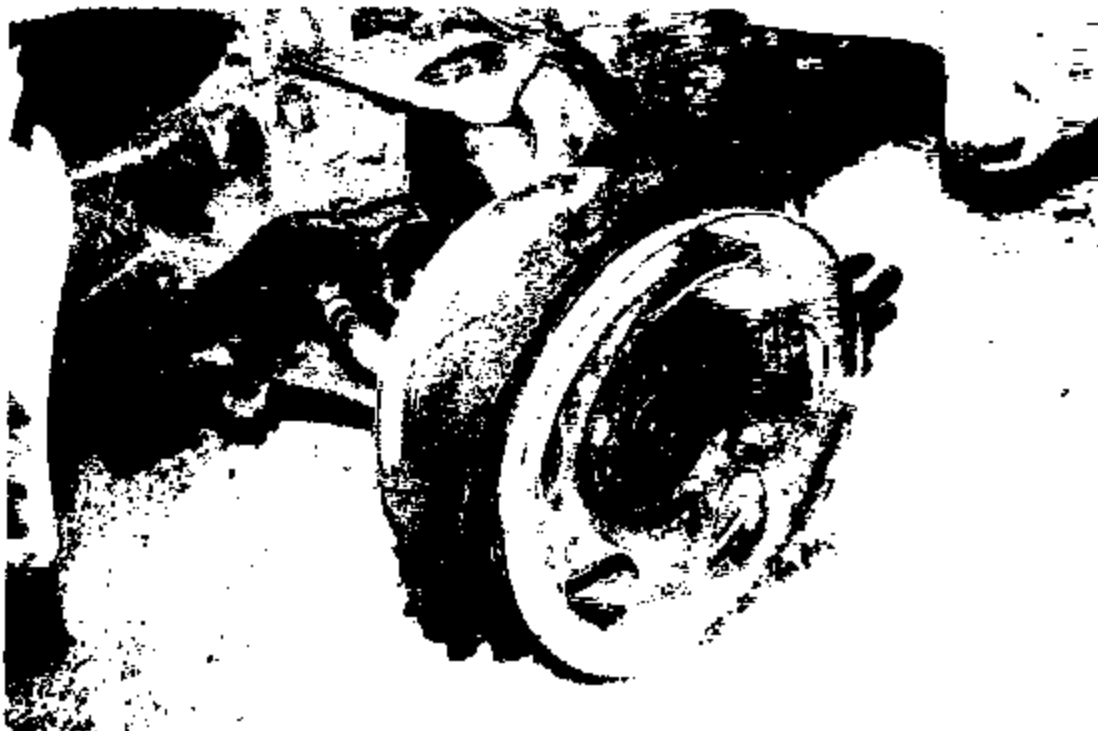
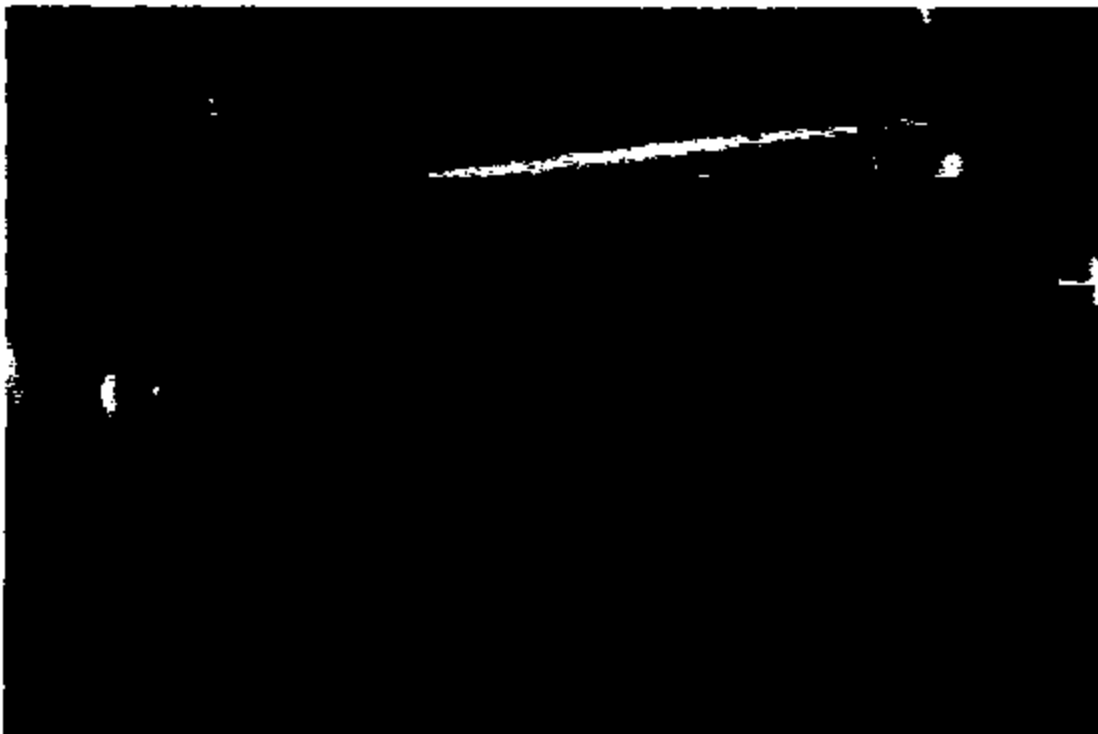
EA05-005-LC1-1003

CONFIDENTIAL

ALL INFORMATION CONTAINED HEREIN IS UNCLASSIFIED

DATE 10-10-2001 BY 60322 UCBAW/STP

EXEMPT FROM GDS



**EFI**

**PHOTO SHEET**

EFI No. 9d508-60262

Insured: Hopp



No. 7



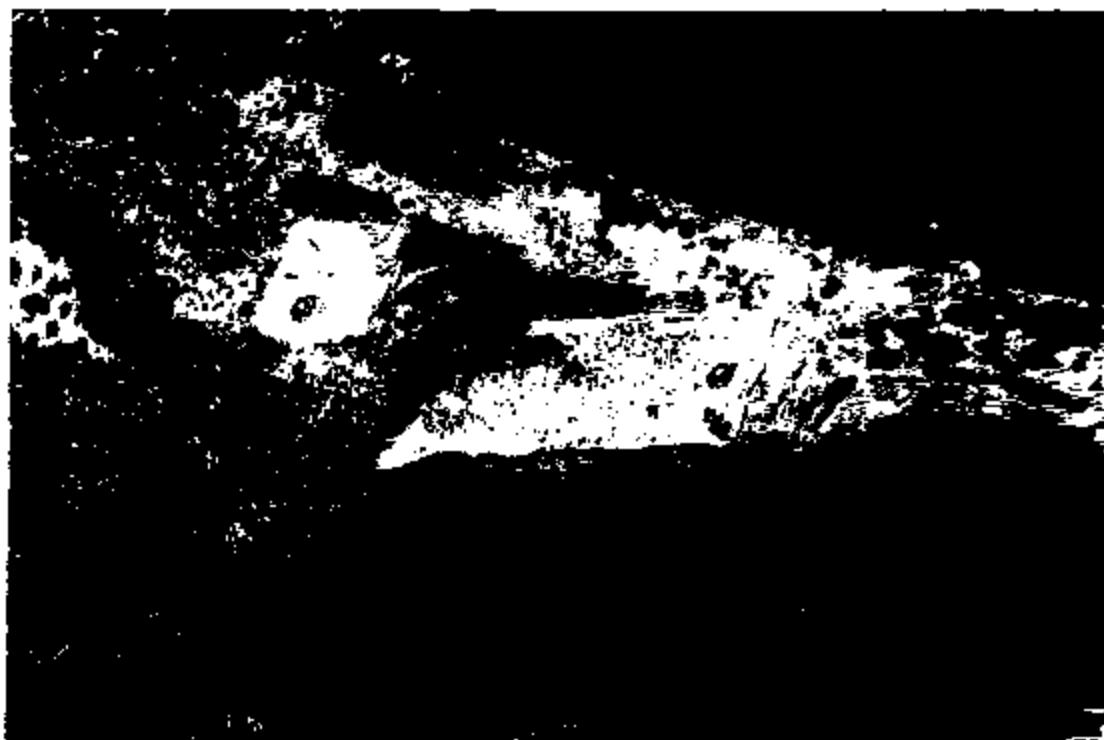
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**EFI**

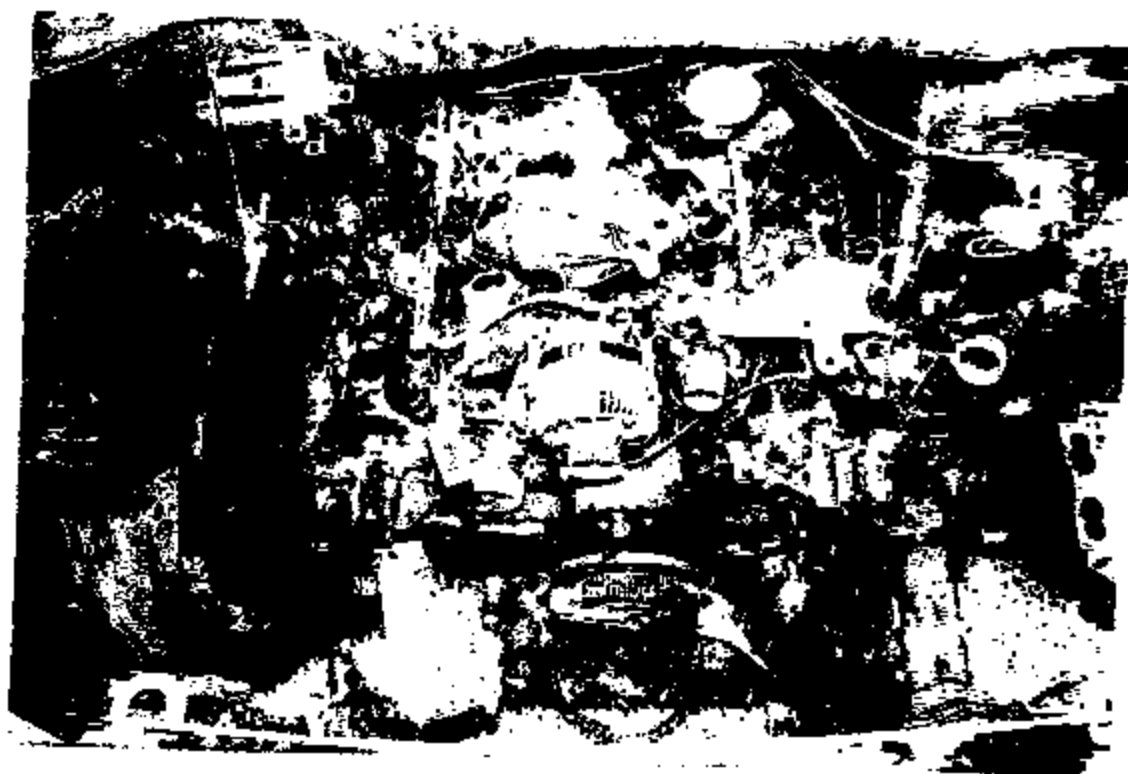
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EFI No. 94508-00201

Insured: Hopp



No. 9



No. 10

800-005-LC1-1800



**EFI**

**PHOTO SHEET**

EFI No. 94508-00262

Insured: Hopp



No. 11



No. 12

**EFI**

**PHOTO SHEET**

EFI No. 94508-00262

Insured: Hopp



No. 13



No. 14

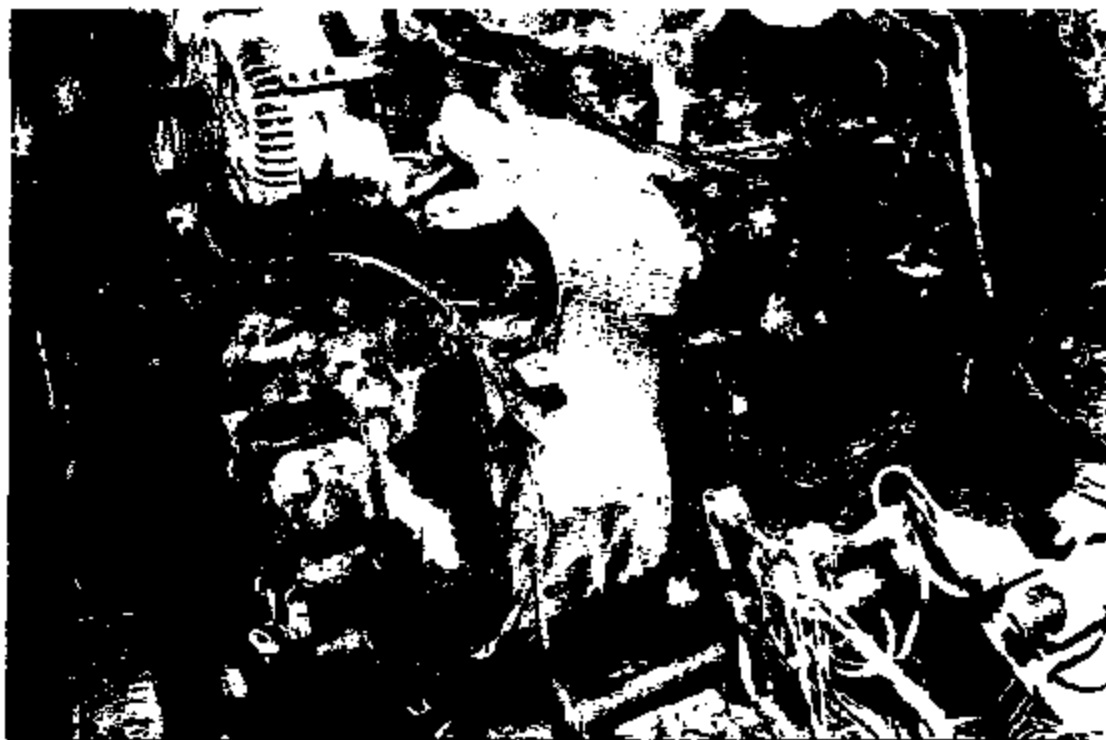
0025-025-LC1-1510

**EFI**

**PHOTO SHEET**

EFI No. 94508-00262

Injured: Hopp



No. 15



No. 16

**EFI**

**PHOTO SHEET**

EFI No. 94508-00262

Insured: Hopp



No. 17



No. 18

EQS-885-LC1-1812

**EFI**

**PHOTO SHEET**

EFI No. 94508-80267

Insured: Happ



No. 19



No. 20

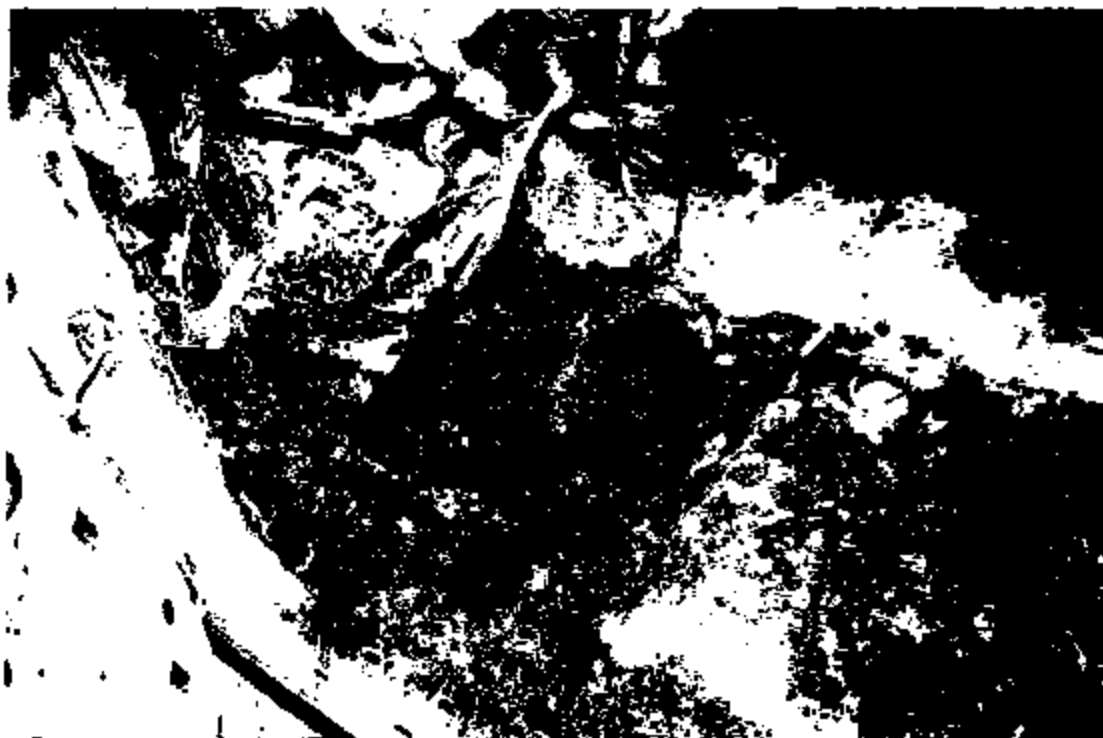
ER05-005-LG1-1813

**EFI**

**PHOTO SHEET**

EFI No. 94508-00262

Insured: Hopp



No. 21



No. 22

EP25-005-LC1-1814

**EFI**

**PHOTO SHEET**

EFI No. 94588-00262

Insured: Hopp



No. 23



No. 24

**EFI**

**PHOTO SHEET**

EFI No. 94508-00262

Insured: Hepp



No. 25



No. 26

EF05-005-LC1-1816



**EFI**

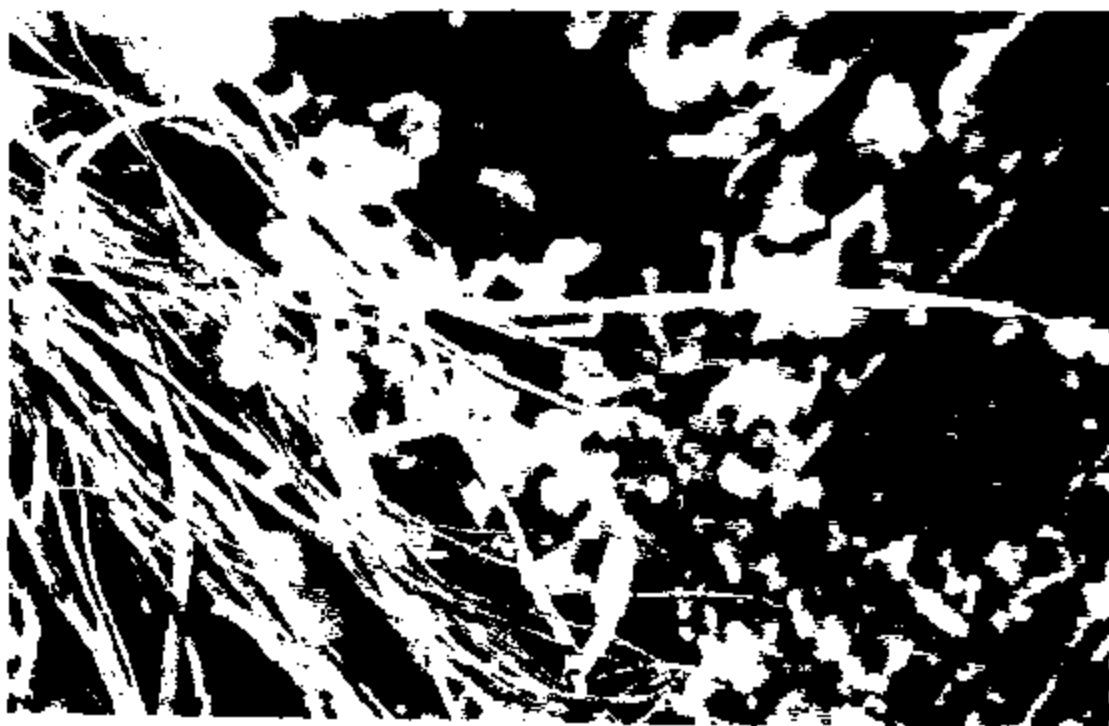
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EFI No. 94508-00262

Insured: Hopp

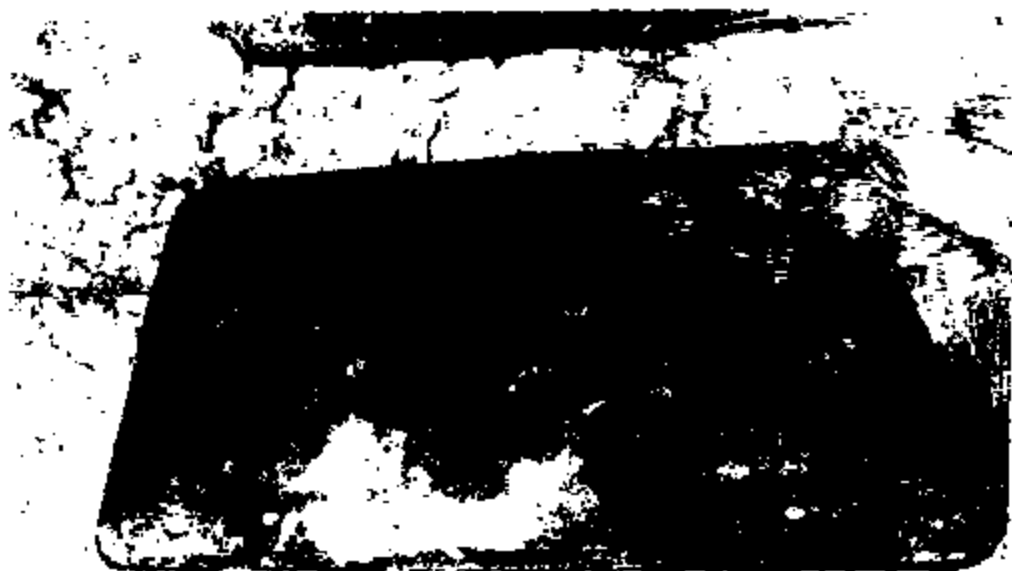


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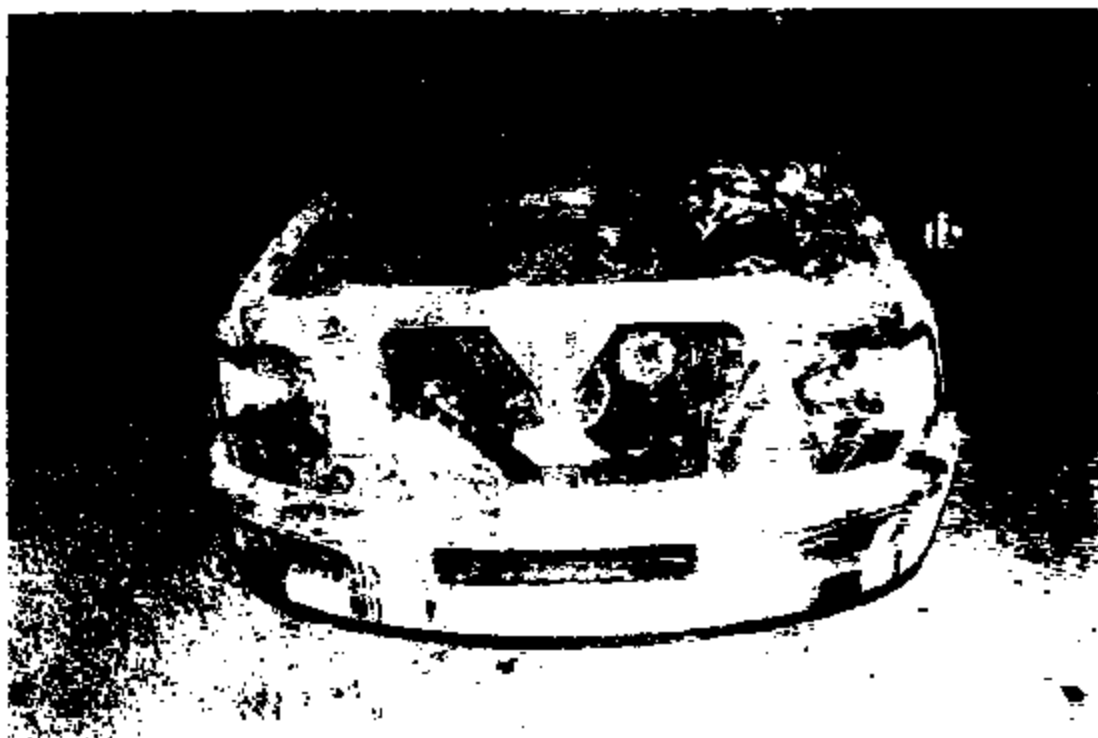


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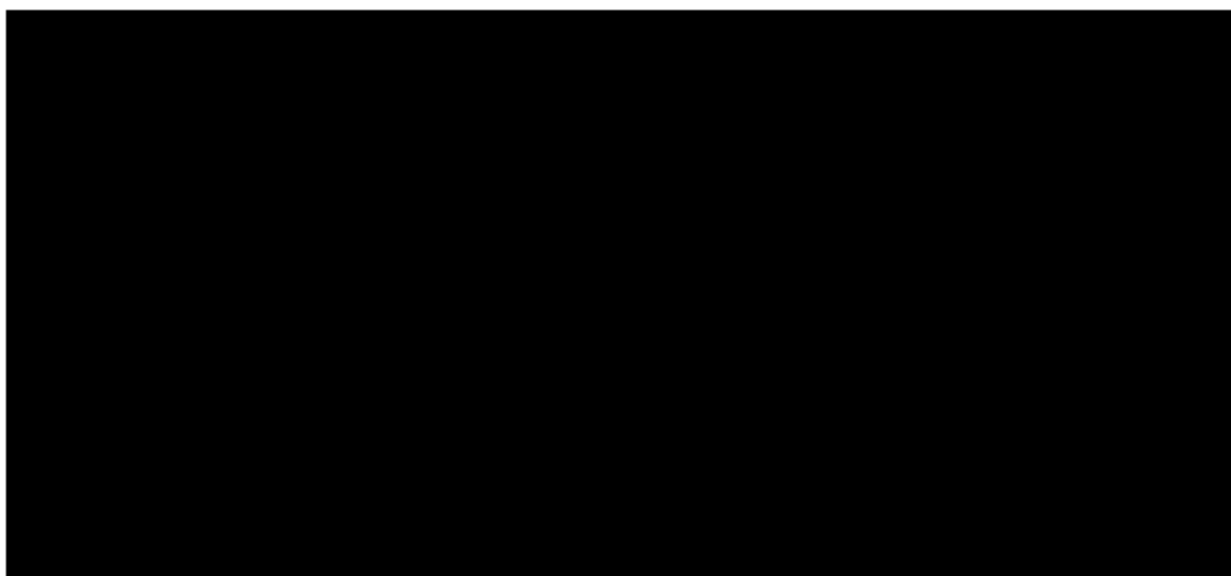








EA85-605-LC1-1621



# State Farm Insurance Companies

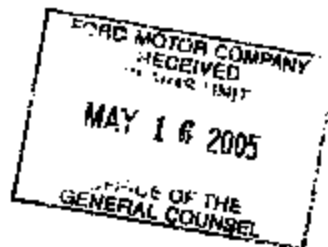


P.O. Box 798011  
Dallas, TX 75378-9011  
(866) 861-0327  
Fax - (866) 287-6078

May 3, 2005

Ford Motor Co.  
Attn: Shawn Norton  
3 Parklane Blvd Suite 300  
Dearborn, MI 48126

*New*



RE: Claim Number: [REDACTED]  
Date of Loss: April 7, 2005  
Our Insured: [REDACTED]  
Year/Make/Model: 2001 Ford Expedition  
VIN: 1FMRU15LX1 [REDACTED]

Dear Ms. Norton:


This vehicle was insured by State Farm and involved in a comprehensive loss. The claim settled for \$16,410.86, which includes our insured's deductible.

Our investigation establishes the cause of loss was due to a fire loss in the engine area ( see color photos ).

Enclosed is our documentation. We will retain the evidence until we conclude this matter with your company. You may contact me to arrange for inspection of the vehicle.

Please consider this notice as our demand for reimbursement.

Sincerely,

  
Pamela Davis - Team  
Claim Representative  
(866) 861-0327 Ext.

State Farm Mutual Automobile Insurance Company

Enclosures

ER05-005-LC1-1822





04/15/05 FRI 15:04 FAX 281 995 8020

STATE FARM INSURANCE.

ACC

0003

FROM :Community Vol. Fire Department FAX NO. :2815643258

Apr. 14 2005 10:35PM P3

**K1 Person/Entity Involved**

Local Option

Business name (if applicable)

Phone Number

Home Number

☐ Check this box if you address by incident involving this site the above information address issue.

Mr./Mrs./Ms. Print Name

NA

Last Name

Suffix

Number

Street Street or Highway

Vehicle Type

Suffix

Post Office Box

Apartment/Building

City

State

Zip Code

☐ Have people involved? Check this box and attach appropriate

**K2 Owner**

☐ Have an owner involved? Then check this box and enter the name of the owner.

Local Option

Business name (if applicable)

Phone Number

Home Number

☐ Check this box if you address by incident involving this site the above information address issue.

Mr./Mrs./Ms. Print Name

NA

Last Name

Suffix

Number

Street Street or Highway

Vehicle Type

Suffix

Post Office Box

Apartment/Building

City

State

Zip Code

**L Description**

Local Option

E-1 arrived and found a Ford Expedition burning mainly in the engine area and spreading to the passenger area, E-1 extinguished the fire using a pre-connected hand line and tank water. Cause of the fire was undetermined due to too much fire damage in the engine.

**M Authorization**

☐ No Staff ID  
Signature

No Staff ID

Signature

Position on staff

Assignment

Shift

Day

Year

☐ No Staff ID  
Signature

No Staff ID

Signature

Position on staff

Assignment

Shift

Day

Year

04/15/05 FRI 15:04 FAX 261 988 6920

STATE FARM INSURANCE. --- ACC. ---

0084

FROM :Community Vol. Fire Department FAX NO. :2815643268

Apr. 14 2005 19:35PM P4

EA502	EX	MM	DD	YYYY	01	05-0601254	000	WRITE - Involvement with fields
NAME	State	Location	Time	Wet/Up	Ins/Up/Ins	Ins/Up/Ins	Ins/Up/Ins	

Involvement

Involvement

Type:

Output:

Output:

X

END

END

04/17/2005

05-0601254

END-005-LC1-1825

04/18/06 FRI 14:04 FAX 281 995 6920

STATE FARM INSURANCE.

ACC

0008

FROM :Community Unit. Fire Department FAX NO. :2815543266

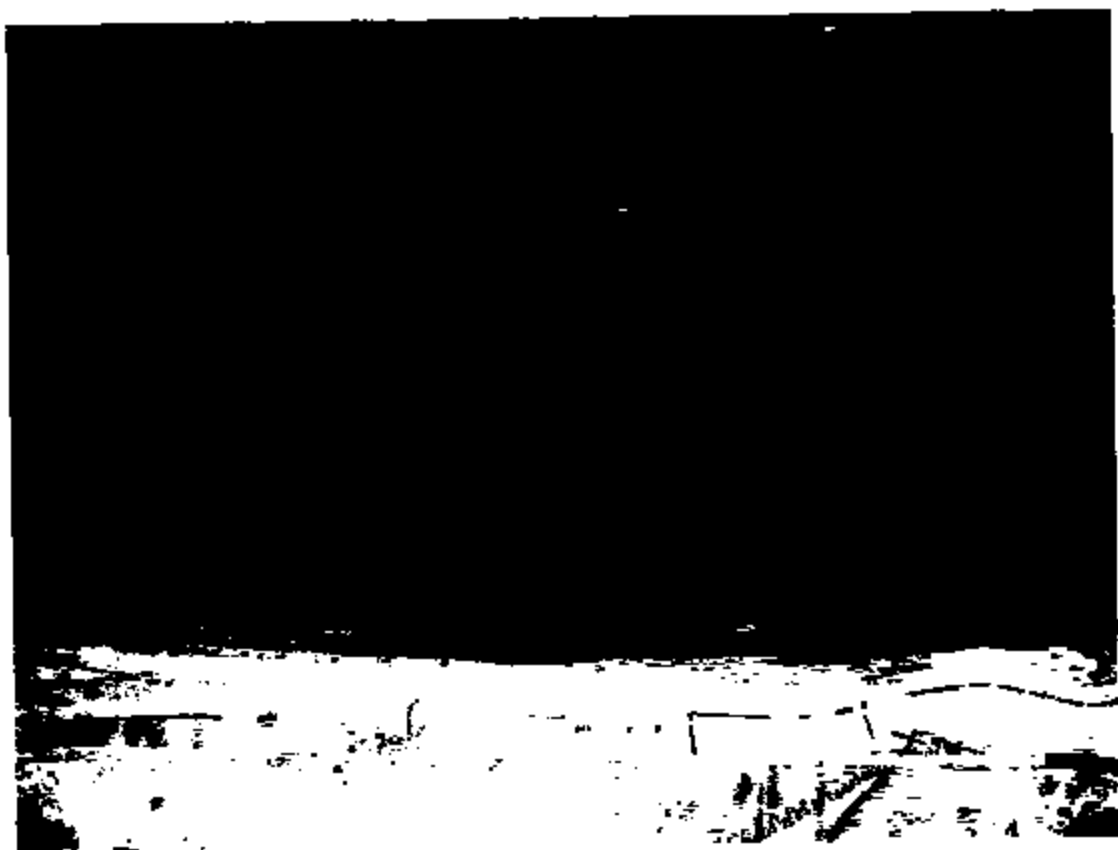
Apr. 14 2005 18:35PM P5

<b>A</b> <u>72802</u> <u>TX</u> <u>04</u> <u>07</u> <u>2005</u> <u>01</u> <u>05-0001258</u> <u>000</u>		<input type="checkbox"/> Damage <input type="checkbox"/> Change <input type="checkbox"/> No Activity	<b>WTRM</b> File #
<b>B Property Details</b> <b>B1</b> <u>Not Residential</u> Estimated Number of residential living units in building of origin whether or not all units were involved		<b>C On-site Materials or Products</b> Enter up to three codes. Check one or more boxes for each code entered. On site material (1) <u>                    </u> On site material (2) <u>                    </u> On site material (3) <u>                    </u>	
<b>B2</b> <u>Buildings not involved</u> Number of buildings involved		1 <input type="checkbox"/> Bulk storage or warehousing 2 <input type="checkbox"/> Processing or manufacturing 3 <input type="checkbox"/> Packaged goods for sale 4 <input type="checkbox"/> Repair or service	
<b>B3</b> <u>None</u> Approximate number of units <u>                    </u> (Include all units) <input type="checkbox"/> Less than one unit		1 <input type="checkbox"/> Bulk storage or warehousing 2 <input type="checkbox"/> Processing or manufacturing 3 <input type="checkbox"/> Packaged goods for sale 4 <input type="checkbox"/> Repair or service	
<b>D Ignition</b> <b>D1</b> <u>Engine area, running</u> Area of fire origin		<b>E1 Cause of Ignition</b> <input type="checkbox"/> Check box or this is an unknown cause. Only to Section 6 1 <input type="checkbox"/> Intentional 2 <input type="checkbox"/> Unintentional 3 <input type="checkbox"/> Failure of equipment or part failure 4 <input type="checkbox"/> Lack of safety 5 <input type="checkbox"/> Other under investigation 6 <input type="checkbox"/> Cause undetermined after investigation	
<b>D2</b> <u>Underpowered</u> Area of fire origin		<b>E2 Factors Contributing To Ignition</b> <u>None</u> <u>Mechanical</u> Factors Contributing To Ignition (1) <u>                    </u> <u>None</u> <u>Electrical</u> Factors Contributing To Ignition (2) <u>                    </u>	
<b>D3</b> <u>Multiple items first</u> Item first ignited <u>                    </u> 1 <input type="checkbox"/> was contained to within all origin		<b>E3 Factors Contributing To Ignition</b> 1 <input type="checkbox"/> Accidental <input checked="" type="checkbox"/> Intentional 2 <input type="checkbox"/> Faulty equipment or part failure 3 <input type="checkbox"/> Failure of equipment or part failure 4 <input type="checkbox"/> Faulty equipment or part failure 5 <input type="checkbox"/> Faulty equipment or part failure 6 <input type="checkbox"/> Faulty equipment or part failure	
<b>D4</b> <u>Multiple items first</u> Item first ignited <u>                    </u> 1 <input type="checkbox"/> was contained to within all origin		7 <input type="checkbox"/> Age was a factor Estimated age of person involved <u>                    </u> 1 <input type="checkbox"/> Male 2 <input type="checkbox"/> Female	
<b>F1 Equipment Involved In Ignition</b> <input type="checkbox"/> None Equipment involved <u>                    </u> Model <u>                    </u> Serial # <u>                    </u> Year <u>                    </u>		<b>F2 Equipment Factors</b> Equipment factor <u>                    </u> <b>F3 Equipment Portability</b> 1 <input type="checkbox"/> Portable 2 <input type="checkbox"/> Stationary Portable equipment actually was used by one person, is designed to be used in multiple locations, and requires no tools to install.	
<b>G1 Mobile Property Involved</b> <input type="checkbox"/> None 1 <input type="checkbox"/> Not involved in ignition, but burned 2 <input type="checkbox"/> Involved in ignition, but did not burn 3 <input type="checkbox"/> Involved in ignition and burned		<b>G2 Mobile Property Type &amp; Make</b> <u>10</u> <u>Passenger road vehicle</u> Mobile property type <u>                    </u> <u>None</u> <u>Food</u> Mobile property type <u>                    </u>	
<b>G3 Fire Suppression Factors</b> Enter up to three codes. <input type="checkbox"/> None <u>None</u> <u>None</u> Fire suppression factor (1) <u>                    </u> <u>                    </u> Fire suppression factor (2) <u>                    </u> <u>                    </u> Fire suppression factor (3) <u>                    </u> <u>                    </u>		<b>Local Use</b> <input type="checkbox"/> Fire-size sign available One of the following provided in the report may be found upon request from either agency <input type="checkbox"/> Area report attached <input type="checkbox"/> Police report attached <input type="checkbox"/> Fire report attached <input type="checkbox"/> Other report attached	
<b>Expenditure</b> <u>                    </u> <u>                    </u> <u>                    </u> <u>                    </u> <u>                    </u> <u>                    </u> <u>                    </u> <u>                    </u> <u>                    </u> <u>                    </u>		<b>0001</b> <u>                    </u> <u>                    </u> <u>                    </u> <u>                    </u> <u>                    </u> <u>                    </u> <u>                    </u> <u>                    </u> <u>                    </u> <u>                    </u>	



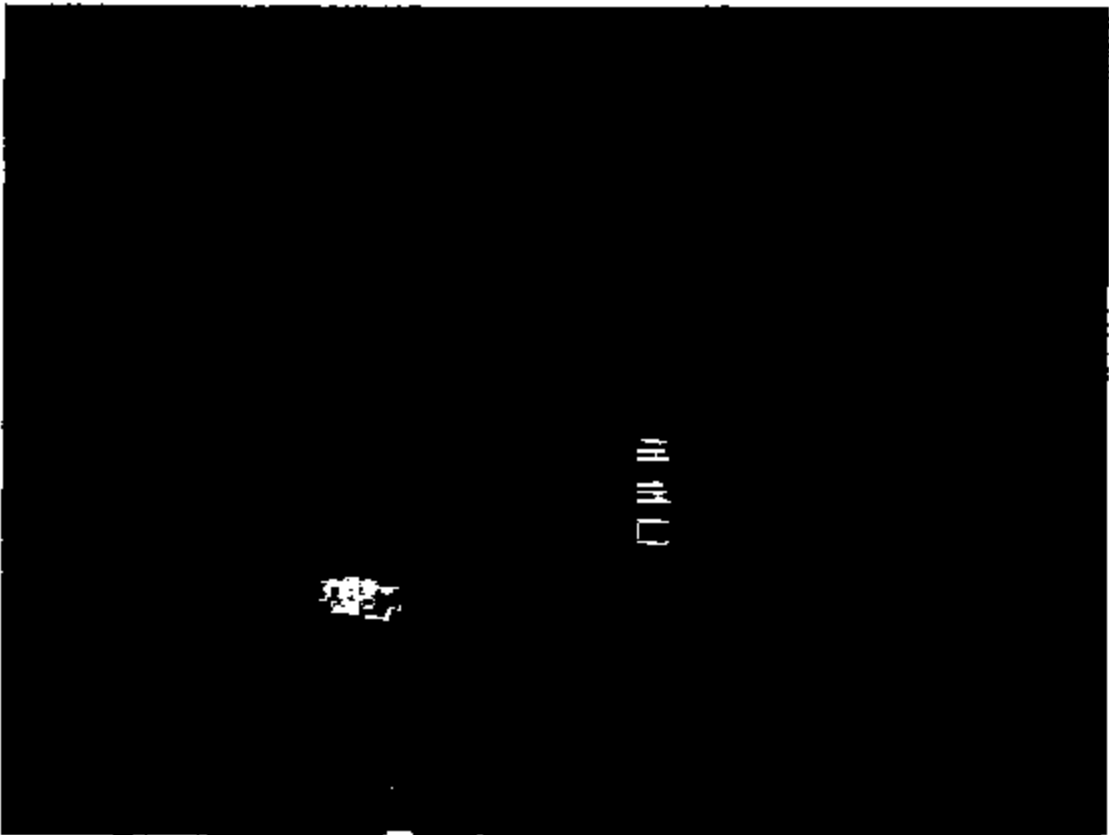
ER85-823-LC1-1827





1965-065-LC1-1529









Bruce Kerns

# INCIDENT REPORT

## Lake Alfred Fire Department

NFIRS-1

FOID 06062	INCIDENT NO 000037	EXP NO. 00	MO 1	DAY 16	YR 00	DAY OF WEEK Sunday	1	ALARM TIME 23:08	ARRIVAL TIME 23:21	IN SERVICE 08:22	
TYPE OF SITUATION FOUND Vehicle fire						TYPE OF ACTION TAKEN 13 Extinguishment			MUTUAL AID None		
FIXED PROPERTY USE Limited access/divided highway						IGNITION FACTOR 981 Other elec failure					
CORRECT ADDRESS COUNTY ROAD 5-17						ZIP CODE		CENSUS TRACT 0			
OCCUPANT NAME						TELEPHONE		ROOM OR APT.			
OWNER NAME						ADDRESS		TELEPHONE			
METHOD OF ALARM FROM PUBLIC Telephone tie-line to fire dept.						CO. INSPECTION DIST. 7		SHIFT A		NO. ADVIS 1	
NO. FIRE SERVICE PERSONNEL RESPONDING 7			NO. ENGINES RESPONDING 1			NO. AERIAL APPARATUS RESPONDING 0			NO OTHER VEHICLES RESPONDING 2		
NUMBER OF INJURED FIRE SERVICE 0				OTHER 0				NUMBER OF FATALITIES FIRE SERVICE 0			
OTHER 0											
COMPLEX Road						MOBILE PROPERTY TYPE 11 Automobile					
AREA OF FIRE ORIGIN Presumably area of interest sq.						EQUIPMENT INVOLVED IN IGNITION 51					
FORM OF HEAT IGNITION Unspecified area			24			TYPE OF MATERIAL IGNITED Polystyrene			48		
FORM OF MATERIAL IGNITED Fm nt classed obj			89			METHOD OF EXTINGUISHMENT Preconn hose/tank			5		
LEVEL OF FIRE ORIGIN Grade to 9 feet			1			ESTIMATED LOSS (DOLLARS ONLY)			38,000		
NUMBER OF STORES Undertnt rptd						0		CONSTRUCTION TYPE Type/Constr. undetermined			
EXTENT OF FLAME DAMAGE Confined to obj of origin						1		EXTENT OF SMOKE DAMAGE Confined to obj of origin			
DETECTOR PERFORMANCE No detectors present						0		SPRINKLER PERFORMANCE No equip present in rty/space			
IF SMOKE BEYOND ROOM OF ORIGIN						TYPE OF MATERIAL GENERATING MOST SMOKE Polystyrene			48		
AVENUE OF SMOKE TRAVEL Undetermined/not reported						0		FORM OF MATERIAL GENERATING MOST SMOKE Fm of Mat nt clst			
IF MOBILE PROPERTY						YEAR 88			MAKE LINC		
MODEL NAVIGATOR						SERIAL NO. SL0PUL381300			LICENSE NO.		
IF EQUIPMENT INVOLVED IN IGNITION						YEAR			MAKE		
MODEL						SERIAL NO.					
OFFICER IN CHARGE (NAME, POSITION, ASSIGNMENT) LT. MICHAEL ALLEN										DATE 1/17/00	
MEMBER MAKING REPORT (IF DIFFERENT FROM ABOVE) LT. MICHAEL ALLEN										DATE 1/17/00	

MAR 17 2000

MAR 09 2000

E005-005-1C1-1832

## NOTES

OWNER STATED THAT HE SMELLED SMOKE AND THE TRUCK STALLED OUT. HE PULLED OFF THE ROAD AND SAW THE FIRE. HE STATED THAT THE VEH. HAD BEEN IN THE SHOP WITH ELECTRICAL PROBLEMS. HE ALSO STATED THAT IT HAD A NEW ENGINE IN IT WITH ONLY THREE HUNDRED MILES ON IT.

JEFF ALLEN

BARILLO WILSON

Page 23

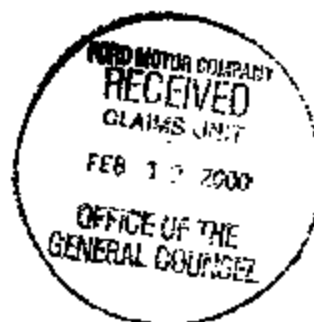
HOBERT M. HIND, JR.  
Tampa  
hhind@bbplaw.com

**B B P**  
**BUTLER BURNETTE PAPPAS**  
ATTORNEYS AT LAW

February 7, 2000

Via Certified Mail No. P 169 677 373  
and regular U.S. Mail

Ford Motor Company – Office of the General Counsel  
Parklane Towers West  
Suite 400; Three Parklane Blvd.  
Dearborn, MI 48126-2568



Re: Our Insured: [REDACTED]  
Claim No.: [REDACTED]  
Date of Loss: 1/16/00  
Our File No.: 0480- t/b/d

Dear Sir/Madam:

This law firm represents the subrogation interests of Nationwide Insurance Company relative to a fire which occurred while [REDACTED] was driving his 1998 Lincoln Navigator on January 16, 2000. The purpose of this letter is to place you on notice of a potential claim so that you can have an opportunity to conduct your own investigation.

On Sunday, January 16, 2000, a fire broke out in the vehicle while [REDACTED] was driving it. The fire caused damage in excess of \$30,000.

As the fire may relate to a defect in the vehicle manufactured by Ford Motor Company, we are notifying you of this loss so that you may conduct your own investigation. The vehicle is currently being maintained at High Tech Auto Body, 3850 Havendale Boulevard, Winter Haven, Florida. Telephone number 883/867-5463. Further, we suggest that you immediately notify your liability insurance carrier so it may take advantage of this opportunity. Your attention to forwarding this correspondence to your liability carrier would be appreciated. If you wish to conduct your own investigation, you merely need to contact the undersigned, and we will assist you in reviewing and examining the evidence.

[REDACTED]

**Miami** Alfred I. DuPont Building, 169 East Flagler Street, 13th Floor, Miami, Florida 33131  
**Tallahassee** SunTrust Bank Building, 3520 Thomasville Road, Suite 102, Tallahassee, Florida 32308  
**Tampa** Bayport Plaza, 6200 Courtney Campbell Causeway, Suite 1100, Tampa, Florida 33607

**Telephone:** (305) 415-2998 **Facsimile:** (305) 415-6848  
**Telephone:** (850) 894-4111 **Facsimile:** (850) 894-4999  
**Telephone:** (813) 281-1900 **Facsimile:** (813) 281-0900

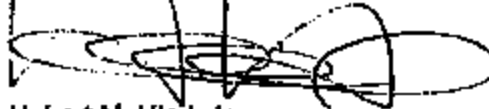
EP03-005-L01-1034

Ford Motor Company  
February 7, 2000  
Page 2

Thank you for your immediate attention and consideration of this matter. Should you have any questions, please do not hesitate to contact the undersigned.

Very truly yours,

BUTLER BURNETTE PAPPAS

A handwritten signature in black ink, appearing to read "Hobart M. Hind, Jr.", written over a rectangular box.

Hobart M. Hind, Jr.

cc: Judy Bates  
Nationwide Insurance Company  
P.O. Box 147081  
Gainesville, FL 32614  
(Via Fax)

Debbie Cunningham  
Nationwide Insurance Enterprise  
2901 West Busch Blvd., Suite 403  
Tampa, FL 33616  
(Via Fax)

052.1(1)

ATTORNEY OR FIRM'S BUSINESS ATTORNEY (Name, state bar number, and address) <b>KEVIN K. CHOLAKIAN (S.B. #103423)</b> <b>JAMES C. CHOO (S.B. #188119)</b> <b>CHOLAKIAN &amp; ASSOCIATES</b> <b>5 Thomas Mellon Circle, Suite 105</b> <b>San Francisco, CA 94134</b> TELEPHONE NO. (415) 467-8200 FAX NO. (415) 467-8206 E-MAIL ADDRESS (Optional):		FOR COURT USE ONLY  <b>FILED</b> SUPERIOR COURT OF CALIFORNIA COUNTY OF ORANGE CENTRAL JUSTICE CENTER  <b>APR 28 2003</b>  ALAN BLATER, Clerk of the Court <i>E. Thompson</i> BY E. THOMPSON
PLAINTIFF'S ADDRESS <b>Plaintiff, [REDACTED]</b> JUDICIAL DISTRICT: SUPERIOR COURT OF CALIFORNIA COUNTY OF ORANGE MAILING ADDRESS: 700 Civic Center Drive West, Room D-110 CITY AND ZIP CODE: Santa Ana, CA 92701-0838 PHONE/FAX:		
PLAINTIFF: State Farm Mutual Automobile Insurance Company  DEFENDANT: Ford Motor Company; Galpin Ford  <input checked="" type="checkbox"/> DOES 1 TO 20 <b>COMPLAINT — Personal Injury, Property Damage, Wrongful Death</b> <input type="checkbox"/> AMENDED (Number): Type (check all that apply): <input type="checkbox"/> MOTOR VEHICLE <input checked="" type="checkbox"/> OTHER (specify): Subrogation <input type="checkbox"/> Property Damage <input type="checkbox"/> Wrongful Death <input type="checkbox"/> Personal Injury <input type="checkbox"/> Other Damages (specify):		
Jurisdiction (check all that apply): <input type="checkbox"/> ACTION IS A LIMITED CIVIL CASE Amount demanded <input type="checkbox"/> does not exceed \$10,000 <input type="checkbox"/> exceeds \$10,000, but does not exceed \$25,000 <input checked="" type="checkbox"/> ACTION IS AN UNLIMITED CIVIL CASE (exceeds \$25,000) <input type="checkbox"/> ACTION IS RECLASSIFIED by this amended complaint <input type="checkbox"/> from limited to unlimited <input type="checkbox"/> from unlimited to limited		CASE NUMBER:  <b>03CC06114</b>

## 1. PLAINTIFF (name):

alleges cause of action against DEFENDANT (name: Ford Motor Company; Galpin Ford)

## 2. This pleading, including attachments and exhibits, consists of the following number of pages: 3

## 3. Each plaintiff named above is a competent adult

a. ☒ except plaintiff (name):(1) ☒ a corporation qualified to do business in California(2) ☐ an unincorporated entity (describe):(3) ☐ a public entity (describe):(4) ☐ a minor ☐ an adult(a) ☐ for whom a guardian or conservator of the estate or a guardian ad litem has been appointed(b) ☐ other (specify):(5) ☐ other (specify):b. ☐ except plaintiff (name):(1) ☐ a corporation qualified to do business in California(2) ☐ an unincorporated entity (describe):(3) ☐ a public entity (describe):(4) ☐ a minor ☐ an adult(a) ☐ for whom a guardian or conservator of the estate or a guardian ad litem has been appointed(b) ☐ other (specify):(5) ☐ other (specify):☐ Information about additional plaintiffs who are not competent adults is shown in Complaint — Attachment 3.
 Form Approved by Federal Bar  
 Judicial Council of California  
 002.1(1) (Rev. July 1, 2002)

012 1013

 COMPLAINT — Personal Injury, Property  
 Damage, Wrongful Death

 Legal  
 Services  
 14154678206

Date of Court Filing: 4/28/03

Page 1 of 2

E003 - 0001 - 01 - 1000

SHORT TITLE: [REDACTED] v. Ford et al	CASE NUMBER:
---------------------------------------	--------------

4. ☐ Plaintiff (name):  
is doing business under the fictitious name (specify):  
and has complied with the fictitious business name laws.

5. Each defendant named above is a natural person  
a. ☒ except defendant (name): Ford Motor Company

- (1) ☐ a business organization, form unknown  
(2) ☒ a corporation  
(3) ☐ an unincorporated entity (describe):  
(4) ☐ a public entity (describe):  
(5) ☐ other (specify):

- c. ☐ except defendant (name):

- (1) ☐ a business organization, form unknown  
(2) ☐ a corporation  
(3) ☐ an unincorporated entity (describe):  
(4) ☐ a public entity (describe):  
(5) ☐ other (specify):

- b. ☒ except defendant (name): Galpin Ford

- (1) ☒ a business organization, form unknown  
(2) ☐ a corporation  
(3) ☐ an unincorporated entity (describe):  
(4) ☐ a public entity (describe):  
(5) ☐ other (specify):

- d. ☐ except defendant (name):

- (1) ☐ a business organization, form unknown  
(2) ☐ a corporation  
(3) ☐ an unincorporated entity (describe):  
(4) ☐ a public entity (describe):  
(5) ☐ other (specify):

☐ Information about additional defendants who are not natural persons is contained in Complaint — Attachment 5.

6. The true names and capacities of defendants used as Does are unknown to plaintiff.

7. ☐ Defendants who are joined pursuant to Code of Civil Procedure section 382 are (name):

8. This court is the proper court because

- a. ☐ at least one defendant now resides in its jurisdictional area.  
b. ☐ the principal place of business of a defendant corporation or unincorporated association is in its jurisdictional area.  
c. ☒ injury to person or damage to personal property occurred in its jurisdictional area.  
d. ☐ other (specify):

9. ☐ Plaintiff is required to comply with a claims statute, and

- a. ☐ plaintiff has complied with applicable claims statute, or  
b. ☐ plaintiff is excused from complying because (specify):

ERIC-005-L01-1037

SHORT TITLE: <b>v. Ford et al</b>	CASE NUMBER:
-----------------------------------	--------------

10. The following causes of action are attached and the statements above apply to each (each complaint must have one or more causes of action attached):

- a. ☐ Motor Vehicle
- b. ☒ General Negligence
- c. ☐ Intentional Tort
- d. ☒ Products Liability
- e. ☐ Premises Liability
- f. ☐ Other (specify):

11. Plaintiff has suffered

- a. ☐ wage loss
- b. ☐ loss of use of property
- c. ☐ hospital and medical expenses
- d. ☐ general damage
- e. ☐ property damage
- f. ☐ loss of earning capacity

g. ☒ other damage (specify): Subrogation - As a result of a vehicle fire to Plaintiff's insured's 2001 Ford T-150 Harley Davidson Truck, Vin. 1FTRND7211K, the subject vehicle was deemed a total loss. Pursuant to an insurance policy between Plaintiff's insured and Plaintiff, Plaintiff incurred damages totaling at least \$34,172.04.

12. ☐ The damages claimed for wrongful death and the relationships of plaintiff to the deceased are

- a. ☐ listed in Complaint — Attachment 12.
- b. ☐ as follows:

13. The relief sought in this complaint is within the jurisdiction of this court.

14. PLAINTIFF PRAYS for judgment for costs of suit; for such relief as is fair, just, and equitable; and for

- a. (1) ☒ compensatory damages
- (2) ☐ punitive damages

b. The amount of damages is (you must check (1) in cases for personal injury or wrongful death):

- (1) ☒ according to facts
- (2) ☐ in the amount of \$

15. ☐ The paragraphs of this complaint alleged on information and belief are as follows (specify paragraph numbers):

Date: April 21, 2003

James C. Choo

TYPE OR PRINT NAME

SIGNATURE OF PLAINTIFF (OR ATTORNEY)

FILED (if filed, date)

COMPLAINT — Personal Injury, Property  
Damage, Wrongful Death

Page 2 of 3

EPH-000-LC1-2530



SHORT TITLE v. Ford et al	CASE NUMBER
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## CAUSE OF ACTION - General Negligence

Page 4

ATTACHMENT TO ☒ Complaint ☐ Cross-Complaint

(Use a separate cause of action form for each cause of action.)

CIVIL Plaintiff (name):

alleges that defendant (name): Ford Motor Company; Galpin Ford

☒ Does I \_\_\_\_\_ to 20 \_\_\_\_\_

was the legal (proximate) cause of damages to plaintiff. By the following acts or omissions to act, defendant negligently caused the damage to plaintiff

on (date): November 4, 2002

at (place): 8081 Holland Drive, Huntington Beach, CA 90808

(Description of reasons for liability):

Defendants had a duty to exercise reasonable care in the maintenance, assembly, inspection, testing, manufacturing, distribution and sale of plaintiff's insured's vehicle and parts used in plaintiff's insured's vehicle. Defendants also had a duty to exercise ordinary and reasonable care in hiring, contracting, subcontracting and supervising of employees, contractors and subcontractors in the performance of these services. As a direct and proximate cause of defendants' breach, plaintiff's insured's 2001 Ford T-150 Harley Davidson Truck, Vin. 1FTRW07E1XK caught fire, resulting in a total loss, and causing plaintiff to incur damages pursuant to an automobile insurance policy. The total amount of damages sought exceeds \$25,000.

Filed Pursuant to the  
Judicial Council of California  
Statutory Authority, § 9002  
July 2002-1/01  
Caption form

CAUSE OF ACTION - General Negligence

Legal  
Signature  
C.A. M.M.

CIVIL 02/11

SHORT TITLE [REDACTED] v. Ford et al

CASE NUMBER

## CAUSE OF ACTION - Products Liability

Page 5

ATTACHMENT TO ☒ Complaint ☐ Cross-Complaint

(Use a separate cause of action form for each cause of action.)

Plaintiff (name) [REDACTED]

Prod1.1. On or about (date) November 4, 2002 plaintiff was injured by the following product:  
2001 Ford T-150 Harley Davidson Truck, Vin. 1FTRW07E11K [REDACTED]

Prod1.2. Each of the defendants knew the product would be purchased and used without inspection for defects. The product was defective when it left the control of each defendant. The product at the time of injury was being

☒ used in the manner intended by the defendants.☐ used in a manner that was reasonably foreseeable by defendants as involving a substantial danger not readily apparent. Adequate warnings of the danger were not given.

Prod1.3. Plaintiff was a

☐ purchaser of the product.☐ user of the product.☐ bystander to the use of the product.☒ other (specify): Subrogee of user/purchaser of the product

PLAINTIFF'S INJURY WAS THE LEGAL (PROXIMATE) RESULT OF THE FOLLOWING:

Prod1.4. ☒ Grant One-Strict Liability of the following defendants whoa. ☒ manufactured or assembled the product (names):

Galpin Ford

☒ Does 1 to 20b. ☐ designed and manufactured component parts supplied to the manufacturer (names):  
Ford Motor Company; Galpin Ford☒ Does 1 to 20c. ☐ sold the product to the public (names):

Galpin Ford

☒ Does 1 to 20Prod1.5. ☒ Grant Two-Negligence of the following defendants who owed a duty to plaintiff (names):

Ford Motor Company; Galpin Ford

☒ Does 1 to 20Prod1.6. ☒ Grant Three-Breach of warranty by the following defendants (names): Ford Motor Company;  
Galpin Ford☒ Does 1 to 20a. ☐ who breached an implied warrantyb. ☐ who breached an express warranty which was☐ written ☐ oralProd1.7. ☐ The defendants who are liable to plaintiff for other reasons and the reasons for the liability are☐ listed in Attachment-Prod1.7 ☐ as follows:Form Approved by the  
Federal Council on  
Government Procurement  
January 1, 1982  
GSA GEN. REG.  
OPTIONAL FORM

CAUSE OF ACTION - Products Liability

Legal  
Scholarship  
Co., Inc.

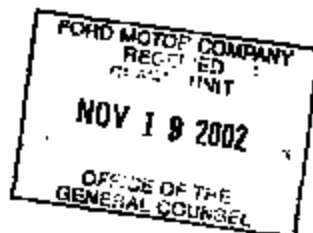
OCP 4513

# State Farm Insurance Companies



11/13/2002

Ford Motor Company  
Attn: Howard Keyes-Mgr-Claims Dept.  
Parklane Tower West Suite 300  
3 Parklane Blvd.  
Dearborn, MI 48126



Claim Office  
333 Civic Drive  
"Off-Taylor Boulevard"  
Pleasant Hill, California 94523-1965

Mail: P.O. Box 4011  
Concord, California 94524-4011

Phone: (925) 680-4100

**VIA CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

Claim Number: [REDACTED]

Date of Loss: 11-4-02

Insured: [REDACTED]

Vehicle: 2001 Ford F150 Harley Davidson Edition

Vin: 1FTRW07L11K [REDACTED]

Dear Mr. Keyes:

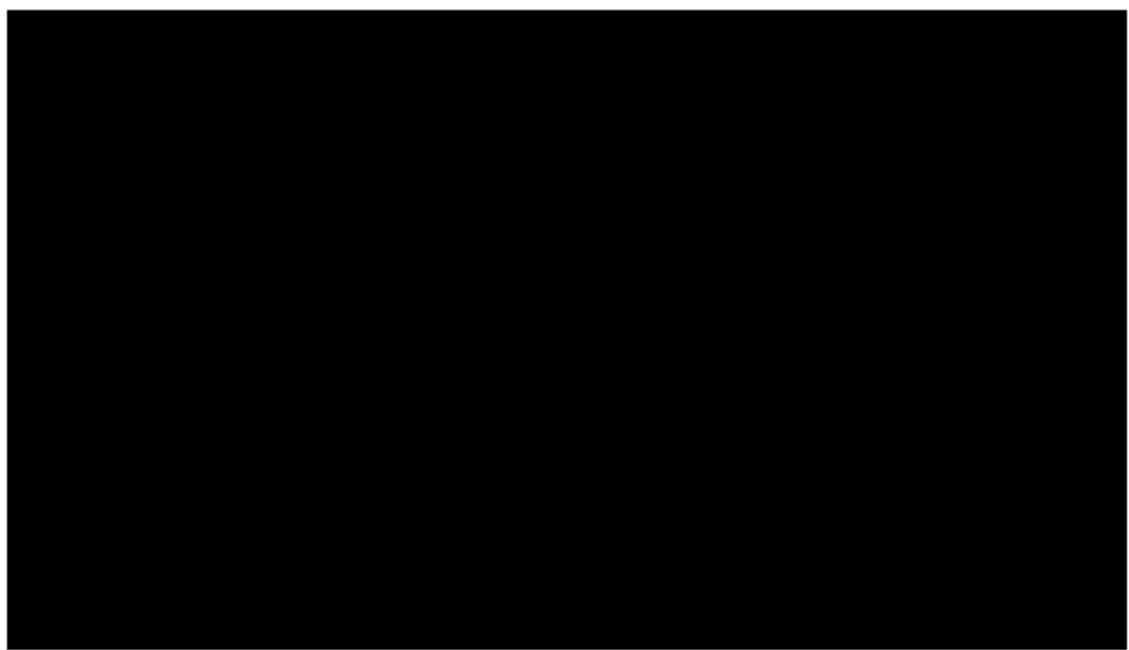
The identified vehicle is insured by State Farm Mutual Automobile Insurance Company. This vehicle was involved in an engine compartment fire loss. State Farm Insurance would like to give you an opportunity to inspect the damaged vehicle or parts. In addition, we would like to give you advanced notice of potential subrogation. Please contact me at 925-680-4155 to set up a time for your inspection. We request that the inspection occur within 15 days from the date of this letter so we may move forward with the resolution of this matter.

Sincerely,

Manuel Berto  
Vehicle Investigator  
State Farm Mutual Automobile Insurance Company  
333 Civic Dr.  
Pleasant Hill, CA 94523  
(925) 680-4155

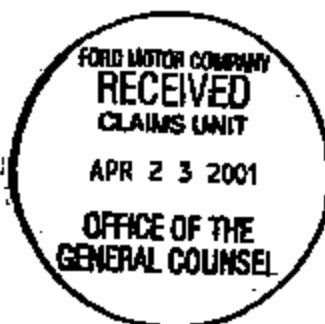
CC.

11/4/02  
- 101 F-150  
- VIN



April 6, 2001 CERTIFIED REQUESTED

Ford Motor Co  
Parklane Towers West Suite 300  
Three Parklane Blvd  
Dearborn, MI 48126-2568  
ATTN:



RE: INSURED : [REDACTED]  
CLAIM NUMBER : [REDACTED]  
YOUR CASE NUMBER : [REDACTED]  
YOUR INSURED : Ford Motor Co  
DATE OF LOSS : 7/1/00  
DAMAGES : \$28825.71

Dear Sir/Madam:

We are the recovery agents for American Home who has made payment to their policyholder for damages arising out of the above cited occurrence. Our investigation of this loss has determined that your insured is responsible for these damages.

Since our client is the equitable subrogee of its insured, on their behalf we request payment of above captioned damages.

Please note our claim number on your remittance and send your check, made payable to American Home in the enclosed self-addressed stamped envelope to:

American Home  
c/o American International Recovery, Inc.  
CLAIM [REDACTED]  
P. O. Box 105795  
Atlanta, GA 30346-9864

Very truly yours,

*C. Dominica*  
Cynthia Dominica  
Recovery Representative  
(800) 748-2069 ext. 3058

CD/kd

ENCLOSURE-101-1842

*\$28826.11*  
*- AM -*  
*- 7053 (M)*  
*- 198 Exped.*

Please Type

1-2-01

TO:

Magna, UT.

RE: Date of Loss - 7/1/00

Amt. of Loss - \$28,825.71

Adverse - Ford Motor Co.

Vehicle - 1998 Ford Expedition

Dear Mr. Steadman,

We have received a request from Ford Motor Company for additional details to evaluate this loss.

We need ~~the copies of~~ the paperwork involving any aftermarket installations. I understand a lift kit was installed. Please forward any details you have regarding this installation to me as soon as possible. I have searched the adjuster's file and cannot locate this information.

I will also need a copy of the sales contract, reflecting your initial purchase of this vehicle and any other <sup>paperwork</sup> information you received from the dealer at the time of the purchase.

If you have any questions, please feel  
free to contact me.

Very truly yours,

Cynthia Dominica  
Recovery Specialist

August 21, 2000

Ms. Kelly McGee, SIU Coordinator  
AIG Claim Services  
161 Wilmington - West Chester Pike  
Chadds Ford, PA 19317

Re: Car Fire Investigation:  
Insured: [REDACTED]  
Investigator: [REDACTED]  
Our File No.: 00-1927  
Your Case No: 00101398

**FINAL REPORT**

Dear Ms. McGee:

**SYNOPSIS**

A 1998 Ford Expedition with unknown Utah license plates caught on fire around 5:22 a.m. on 7/1/00 in the 1400 block of Camino Del Mar, Del Mar, CA.

The Del Mar Fire Department responded to the car fire call at 5:23 a.m. and arrived 4 minutes later at 5:27 a.m.

The listed probable cause of the fire was electrical and located in the vehicle's engine compartment.

The vehicle was towed from the fire scene by Rose Towing.

**ASSIGNMENT**

1. On 8/1/00, I was requested to interview the police officer that responded to the scene of the car fire.
2. Interview the fire crew that responded to the scene of the fire.
3. Request copies of the police and fire reports.

**INVESTIGATION**

On 8/8/00, I met Captain Jim Wood at the Del Mar Fire Department 2200 Jimmie Durante Blvd., Del Mar, CA. (Phone number 858-755-1521.) Capt Wood introduced me to his crew that had responded to the car fire, on 7/1/00, in the area of 1400 Camino Del Mar in Del Mar, CA. Present with Capt Wood was Jerry Adams the engineer, and



Car Fire Investigation  
AKG Case Number 00101398  
Insured: [REDACTED]  
Page 2

Mike Mejia firefighter. Dan Parras, an on call firefighter who had responded to the fire, was not available for the interview.

Captain Wood related that unit 2511 had responded to the fire call at 5:23 a.m. on 7/1/00. While enroute to the fire, Captain Wood noticed a large plume of dark smoke appearing over a hill. He thought that was unusual for a car fire. They arrived in the [REDACTED] to Del Mar at 5:27 a.m. He saw that a Ford Expedition was fully engulfed in flames. The vehicle was facing Northbound and parked near the East curb in front of a business at [REDACTED] (Also known as Pacific Coast Highway.) Captain Wood and his crew initiated the use of foam and water to control the fire, which was extinguished by 5:59 a.m. Captain Wood remarked that in 28 years of fire fighting, he had never seen a car fire that was so hot. The heat was so intense that it melted the hood of the Ford Expedition. Captain Wood went to say that he later contacted a Ford dealership to confirm what the vehicle's hood was made of. He was told that the hood was made of metal.

Captain Wood also talked with [REDACTED] the driver of the Expedition. The driver had stated that he had heard popping noises in the engine compartment. They had pulled over and checked the engine but didn't see anything. They continued on until the same noises started again. They pulled over and then noticed a fire in the engine compartment.

Engineer Jerry Adam related that he has been a fire fighter for 18 years. He said that he has never seen a car fire that was so hot. The heat was so intense that it caused heat damage to the shell of a newspaper vending machine that was approximately 4 feet away from the vehicle. He described the driver of the Expedition as a male in his 50's, around 6 feet tall, weighing around 200 pounds and wearing glasses. A younger male was with him. Mr. Adams also noticed that a Sheriff's unit arrived at the car fire after they did. The deputy performed traffic control duties at the scene. He described the deputy as a Caucasian male in his 30's or 40's, very thin, about 6 foot tall and wearing very thick glasses. Mr. Adams wasn't sure, but thought that the deputy gave a ride to the driver and his son.

Firefighter Mike Mejia has been a firefighter for around 8 years. He related that he removed some luggage from the rear of the Expedition after the fire had been extinguished. The luggage was heat and smoke damaged.

I attempted three times to contact firefighter Dan Parras by leaving my telephone number at the Fire Department switchboard. Mr. Parras never phoned me back.

On 8/10/00, I contacted the San Diego County Sheriff's station that is located at 175 N El Camino Real, Encinitas, CA. (Phone number 858-585-5200.) An attempt was made to locate a police report on the fire incident. The personnel on duty could not find any report. I phoned the same station again on 8/11/00 and received the same response. On 8/17/00, I contacted Sergeant Campbell, a traffic supervisor. Sgt. Campbell explained that a report was probably not taken because it wasn't a crime or injury case.

Car Fire Investigation  
AIG Case Nuber 00101396  
Insured: [REDACTED]  
Page 3

Under these circumstances, the deputy wouldn't be required to file a report. I requested that a check be made of the dispatch tapes for 7/1/00 and determine who the deputy was that had stopped at the fire scene. On 8/18/00, I received a phone call from Sgt. Campbell. She related that there weren't any dispatches found for the car fire on 7/1/00. Also, Sgt. Campbell was unable to locate any deputies based on the description that I had given her.

Per the Del Mar Fire Department, the disabled Ford Expedition was towed away from the fire scene by Rose Towing 2201 San Diego Dr. in Del Mar, CA. The phone number is 858-755-8426.

This report concludes the requested investigation of this matter. Please feel free to contact me should you have any questions or require any further assistance with this or Any other matter.

We appreciate your continued confidence in our services.

Sincerely,

  
Joseph L. Ostermann  
Rainbow Investigative Services  
PI 19091  
(858) 672-1664

JLO: rc  
Enclosure

DEL MAR FIRE DEPARTMENT  
INCIDENT REPORT - VEHICLE FIREREPORT NO: 08-0527  
CODE: 1-03DATE: 7/1/08 TIME: 0522 TYPE: VEHICLE FIRE DIST: DMR  
LOCATION: [REDACTED]

REP. PARTY: [REDACTED]

OWNER: [REDACTED]

UNITS DEPLOYED: 0523 ARRIVED: 0527 RESPON TIME: 04 MINUTES

UNIT #	RESPOND	ON SCENE	EXPORT	AVAIL	SIG
2511	0523	0527		0559	0605

RESPONDING PARTY INFORMATION

PERSONNEL: WOOD, ADAMS, MEJIA, PARRAS

VEHICLE FIRE INCIDENT SUMMARYVEH LIC: [REDACTED] STATE: UTAH YE: 06/01/08: 98 FORD EXPEDITION  
DRIVER: [REDACTED] ADDRESS: [REDACTED] UTAH  
OCCUPANTS:  
FIRE CAUSE: ELECTRICAL  
PT OF ORIGIN: ENGINE COMPARTMENT  
APPROX \$ LOSS: 20,000 CONTENT:  
AREA DAMAGED: ENGINE AND INTERIOR  
EXTING AGENT: FOAMINCIDENT SUMMARYDRIVER STATED HEARING POPPING NOISE RIGHT SIDE ENGINE COMPARTMENT.  
PULLED OVER, CHECKED ENGINE, NOTHING FOUND. STARTED DRIVING AGAIN,  
SAME SOUND STARTED, PULLED OVER 2ND TIME AT WHICH TIME FIRE HAD  
STARTED IN AREA WHERE NOISE HAD COME FROM. FIRE WAS EXTINGUISHED  
AND OVERHAUL PERFORMED. VEHICLE TOWED BY ROSE TOWING.

The foregoing is true and accurate to the best of my knowledge.

Reporting Officer: [Signature]

Date: 7-2-2008

RECORDED INTERVIEW

Today's Sunday the 13<sup>th</sup> of August, 2000. This is an interview between [REDACTED] Private Investigator. It's about 9 AM.

Q: [REDACTED] are you aware that I'm recording that

A: Yes.

Q: Interview? Thank you. When and for what reason did you borrow the vehicle of [REDACTED]

A: We borrowed the vehicle, I believe the day before our vacation. I can't remember when we went on vacation. It was in July. The end of June. So we went down to California for about a week. We borrowed the vehicle from him, the day before we left on vacation.

Q: Okay. And how long did you have the vehicle and where were you traveling?

A: We traveled from our home here to San Diego, California. Del Mar, which is a part of San Diego, is where we went. We were there for about 7 days I think and then the accident, or the vehicle started on fire, I think it was 2 days before we left California. So it was towards the end of our vacation.

Q: Was any money exchanged for the use of the vehicle?

A: No.

Q: Okay, what vehicles do you own and how many drivers reside in your household?

A: I have 3 vehicles. A 1994 Jeep Cherokee. A 1988 Ford XLT full size van. And a 19, let's see, 1998 Subaru Legacy Outback. And there are, let's see, 1, 2, 3, 4, 5 drivers who reside in our home. The reason why we borrowed their vehicle, do you want me to tell you that?

Q: Yes, go ahead.

A: Is because our van was broken, it wasn't running well. We have a huge family. We didn't have enough room in our vehicles to go to California. And the Steadmans had, their car had been in for electrical problems several times. And they wanted to see how it would go on a long trip, if it would go well and they knew we needed the bigger car, so they offered to let us take it.

- Q: Okay. Can you tell me the circumstances surrounding the fire? If you can start like 24 hours prior to the fire.
- A: Okay. Let's see, I can't remember exactly what we were doing 24 hours before the fire, but we had gone to bed the night before the fire. We were sleeping. Me and my son were going shell hunting on the beach, Del Mar, at 5 o'clock in the morning. So, we got up in the morning, got dressed, got in the vehicle and drove about 2 miles from my sister's home, down to Del Mar Village, which is where the beach is. And that's where the accident happened, so there was no cars on the road, nobody was there. And we were just shell hunting, going to go shell hunting just because it was low tide. So, as we drove downhill from her house and got onto the highway, I think it's Highway, oh I can't remember what the highway is, it's the coastal highway there. We, and as we got into the village of Del Mar, the car started making a clicking sound, kind of like a sound you would have if you had a frayed fan belt hitting plastic. So I pulled over and left the vehicle running. Tried to see if there was anything wrong. Checked the belts, see if, it's hard to see into those engines, but everything looked fine. I turned the engine off. I checked the coolant. I checked the oil. I checked all the fluids, just to make sure there was nothing wrong that would ruin the vehicle, you know, it was making the funny sound. So then, after I checked everything, I decided, well I'll just go a little bit further, park, go hunt shells and then decide what to do after that. So I drove probably another block or half a block and it was still making that clicking noise. And then I thought, no I better quite driving it and I'd need to call the dealer and make an appointment. But it was 5 o'clock in the morning, so, I pulled over. I tried to park in a place where I thought a tow truck could come and get the car because I figured we'd be towing it to have a dealer come and look at it. And as soon as I stopped the car, a fire broke out under the hood. And it looked like it broke out under the, on the right, let's see, the passenger side, up above, you know, higher, up on the engine, that's what it looked like to me. There was just a sound of kind of, whew, I don't know what you'd call it, not an explosion but you could hear the fire going. Smoke started coming out of the sides

on the hood. And so, we got out of the car and there was a bagel shop nearby and they weren't open yet, they were preparing for the day. So I went and banged on the door. And had them call 911, the fire department. And I got a fire extinguisher from them. I came back out, there was fire coming out of the hood and smoke and I got in the car, even though it seemed kind of dangerous, because I thought maybe the car would explode, if it, the flames got to the gas tank or something. I popped the hood and then I was going to, so the hood popped up just a little tiny bit but didn't go up. And then my son said, hey don't open the hood because they taught us in driver's ed if you open the hood, the flames will, the air will, the gust of air will make the fire worse, so I tried to, it was a pretty big fire extinguisher. I put the fire extinguisher up to the fire, the wheel wells, through the front in the crack, down from the windshield, just everywhere I could to try to put the fire out, emptied the fire extinguisher. It would not go out. Fire just kept getting bigger. Flames were maybe, I don't know, 8 feet off the hood. By that time, it was getting out of control. So I ran back to the bagel shop, said did you guys call 911 yet? And they said, yes we did. So, it seemed like it took about 10 or 12 minutes for the fire department to get there, but it could've been quicker. It seemed like a long time. And after we, there was nothing we could do about the fire. We just kept our distance because I thought the whole vehicle was going to blow up. So the fire department came and put out the fire. Called a tow truck. It, well, yes, they called a tow truck and took it to a wrecking yard. That was all between probably 5 o'clock and 6:30. Somewhere in there, in the morning.

Q: So, did you lose any items in the fire?

A: Yes, some small things, like there were some cassette tapes that were ruined because of the water damage from the fire department. A blanket, just, nothing really of any significant value.

Q: And did you make a homeowners claim for the lost items?

A: No. I didn't. I thought that would increase my premium, or what I lost was not worth (inaudible)

Q: So where did you go from the scene of the fire?  
A: The sheriff, there was a sheriff there, a law enforcement officer there and the fire engine crew. And after the fire, the sheriff's department, the sheriff took me and my son back to my sister's home.

Q: So did you rent  
A: On that morning.

Q: On that morning.  
A: And then the next day we rented a car, I think it was a National Car Rental chain in Sewana Beach and then we drove it home the next day after we rented it.

Q: Okay. Can I have your vehicle insurance company information and the phone number of your agent?  
A: Why?

Q: I don't know, it's right here, I'm just asking.  
A: Well who's asking you to do this?

Q: The insurance for Terry.  
A: For the Steadmans.

Q: Yes.  
A: Yes, my insurance is Farmer's Insurance.

Q: Okay.  
A: And my agent is Doug Arden, in Orton.

Q: O-R-T-O-N?  
A: Yes. What are they going to do, try and make my insurance pay for this?

Q: No.  
A: That's good. So the insurance company hired you

Q: Yes.  
A: Is that right?

Q: Yes. Okay, well that concludes the interview. Thank you.  
A: That's it?

Q: Yes.  
A: Wow.  
BS/mw

RECORDED INTERVIEW

This is an interview conducted by Bridget Stevenson, Private Investigator, between Bridget Stevenson and [REDACTED]. Today is Friday, August 18, 2000. It's about 2 PM.

Q: [REDACTED], are you aware that I'm recording this interview?

A: Yes.

Q: Okay. Here are the questions that I have for you. When and where did you purchase the vehicle from?

A: Auto Collection, West Valley. December 2<sup>nd</sup>, 1998.

Q: Okay. All the repairs and maintenance done on the vehicle since you owned it, where was the work done?

A: At Auto Collection, West Valley.

Q: Okay. Do you remember when?

A: I can't remember exact dates, but I have sent my insurance company, AIG, all the paperwork on it.

Q: Okay. So do you have any copies of the receipts for all these repairs ordered?

A: I sent them and I've got some, yes.

Q: But did you send them everything you had

A: Yes I did.

Q: Did you hear any of the squeaking noises that Mr. Berrett mentioned, before when you were driving the vehicle?

A: No. (Inaudible).

Q: Okay. Is there anything that you can remember that may have, that you may have heard or experienced while you were using that vehicle?

A: No, we just had trouble with the keyless entry. I've had it back about 4 times for that.

Q: Okay. What was the main use of your vehicle?

A: Everything. We've got some property up in Strawberry Pinnacles. We've used it for going back and forth there. Just, everything.



Q: Okay. What were the circumstances behind you lending the vehicle to your friend?  
A: They were thinking about buying an Expedition. This is where this all started.

Q: And they're not friends, they're  
A: They're family

Q: Oh I'm sorry  
A: It's not friends.

Q: Okay.  
A: And, so we were talking to them about it and asked them, they've got a large family, if they wanted to use it (inaudible). And they said, yes they would try it out and see. So we did. And we had their Outback. We did have their Outback.

Q: Okay.  
A: I don't know who makes Outback, but it is an Outback.

Q: So, do you remember when and where did you let him borrow the vehicle? When was it exactly?  
A: Okay, it was the 27<sup>th</sup> of June. They'd come out, at our home.

Q: And how long was he supposed to keep the vehicle?  
A: While they were on vacation. 2 weeks.

Q: And they were going where?  
A: To California.

Q: California?  
A: To stay with his sister. With [REDACTED] sister.

Q: Was any money exchanged for the use of the vehicle?  
A: No.

Q: So you just said that you used his Outback while he was using your vehicle, right?  
A: Yes.

Q: And how many vehicles do you own?  
A: I have, counting the Expedition?

Q: Yes.

A: 4.

Q: 4. And how many people are living here with you?

A: Just my wife and I.

Q: Well, that's all for today. And these complete the interview. Thank you.

BS/mw

TO:

AIG

RE:

TERRY STEADMAN  
1998 FORD EXPEDITION

## REPORT

### VEHICLE EXAMINED:

The vehicle was a 1998 Ford Expedition with VIN # 1FMPU1BLOWL and stock # 3746210. These two numbers were used to identify the vehicle to be examined.

### LOCATION:

The vehicle was located at Copart in San Diego CA. This was the same location at which the vehicle was to be examined.

### PRELIMINARY:

As per your request, on 8/3/00, I traveled to the above mentioned location and examined the above captioned vehicle. The vehicle was identified by its VIN, year, make and model.

The vehicle was being operated at the time of the fire. The operator heard a clicking noise then pulled over and the vehicle was discovered to have been on fire. There was a report of electrical work done by an auto collision center in West Valley CA.

### EXTERIOR EXAMINATION:

Examining the exterior, I found the fire damage to have been concentrated in the engine compartment area of the vehicle. The hood, windshield, grill and front fenders were the most directly affected components on the exterior of the vehicle.

The windshield was the only window glass that was directly affected by the fire. The other windows on the vehicle were smoke and soot stained to the inside surfaces but still in place.

The tires on the vehicle were next examined. The two front tires were affected by exposure to the fire. The passenger side front tire was affected the most. The rest of the tires were still inflated at the time of this examination.

### INTERIOR EXAMINATION:

Examining the interior, I found the fire to have been mainly in the center upper section of the dashboard. All of the indicators pointed to the fire spreading from the engine compartment into the passenger compartment by way of the windshield.

The majority of the interior of the vehicle was affected by varying degrees of heat and smoke damage. The closer to the upper dashboard area I examined the more intense the smoke and heat was.

The wiring in the dashboard area was examined. There were found no signs of shorting, heating or electrical over heating in the wiring or the components located under the dashboard. The top of the dashboard was the fire damaged area and this damage did not extend much into the interior of the dashboard of the vehicle. While the dashboard was being examined the odometer was checked. The mileage was found to have been 7053 and the trip meter read 311.7 miles.

The floor area of the vehicle was examined. There were found no indications of the fire burning through the carpeting. There was drop fire damage in the front seat area only. This drop fire damage appeared to have been from the fire entering the passenger compartment by way of the windshield.

#### **ENGINE COMPARTMENT EXAMINATION:**

The general burn patterns were examined and found to have pointed to the front passenger side of the engine as the area with the most intense fire related damage. The damage was from the lower passenger side front upwards and towards the rear.

The electrical wiring and components in the engine compartment were examined. There was fire damage found to the wiring and components. There were no signs of shorting, heating or electrical over heating that would be consistent with an electrically caused fire.

The fuel lines and system in this compartment were examined. The lines, the rail and the injectors were all fire damaged. There were, however, no indicators of these components being involved in the cause of this fire.

The lower passenger side of the engine compartment was next examined. There was found an oily residue that was along the bottom section of the compartment. There was also found a missing section of pressure hose. This hose would have connected the transmission cooling lines from the radiator to the transmission.

Leading from the lower passenger side front was a burn pattern that was more intense in the lower passenger front and less intense the further away from the lower front I examined. There was also a pattern on the radiator surface facing the interior of the engine compartment. That pattern pointed to the lower passenger side front.

The engine oil and transmission fluid levels were checked. The engine oil level was at or near the proper level and the transmission fluid level was recording on the dipstick. There appeared to be no components missing from the engine compartment that could not be accounted for in terms of fire damage.

#### **CHASSIS EXAMINATION:**

The under side of the vehicle was examined and found to have been intact. There was some fire-related damage in the front fender areas but this was due to the fire from burning from within the engine compartment. There was also an oily residue under the front section of the chassis.

#### **NOTE:**

The recalls for this vehicle were checked. None of the recalls were related to this fire. There was a recall for the transmission indicate lever. This recall concerns the selector cable coming loose and this would have made it impossible to shift the vehicle from park.

I would strongly suggest that a complete description of the repairs that were done should be obtained. There may be other work done that was not described. One of the major questions that this could address is whether there was any damage to the area of origin.

#### CONCLUSION:

#### ORIGIN:

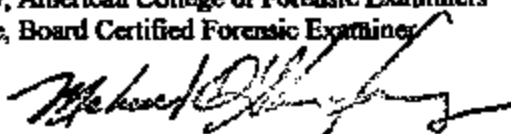
Based on the burn patterns observed during the examination, this fire was found to have started in the engine compartment of the vehicle. The area of origin was found to have been in the lower passenger side front of the engine. This was the same area as a number of transmission lines. This was the area of the vehicle that was bordered by the engine, the radiator and the lower front frame members. Just to the rear of this area was found the exhaust manifold on the passenger side of the engine.

#### CAUSE:

After all of the available information was reviewed the fire was determined to have been accidental in nature. The burn patterns and other indicators were found to have pointed to the fire being fueled by a combustible fluid. There was also a section of a flexible transmission line missing due to fire. There appeared to have been a pattern that would be consistent with a spray like pattern. All of the patterns pointed to the fire being caused by a leak in the transmission-cooling line. This leaking transmission fluid was then most likely ignited by a hot exhaust surface like the manifold or even the converter.

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.

Richard J. Pacheco, BCFE, CFEL, MFE, FL  
Master Forensic Examiner  
Fellow, American College of Forensic Examiners  
Diplomate, Board Certified Forensic Examiner



Member, \*Michael O'Shaughnessy, CFEL, CFI, ABFE  
MS, Forensic Science  
Senior Forensic Analyst  
American Board of Forensic Examiners  
Society of Automotive Forensic Examiners

Liberal Oliveira, FL, IL  
Senior Forensic Analyst  
ASE Certified Technician  
Certified RI Auto Inspector  
Oil Filter Technician

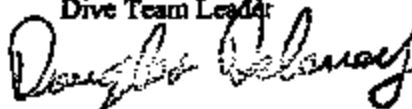
Member, Dennis Mignogno, IL  
Forensic Analyst  
ASE Certified Master Technician  
Society of Automotive Forensic Examiners

Elden DaSilva, FL, IL  
Forensic Analyst

Milton Piola, CFI  
AS, Fire Science  
Forensic Analyst

Antonio Monteiro, FL, IL  
Forensic Analyst

Manuel Ferreira  
Licensed Electrician  
Forensic Analyst  
Dive Team Leader



Douglas Delaney  
Forensic Analyst  
ASE Certified Master  
Mechanic

Leslie Caulfield, BS  
MT (ASCP)  
Clinical Laboratory  
Scientist

Robert Desmarais  
Forensic Analyst  
Heavy Equipment Specialist  
Marine Engine Mechanic



FBIS-005-LC1-1000



EA05-005-LC1-1881





EA05-095-LC1-1002



ERG-005-LC1-1863



E905-005-LC1-1864



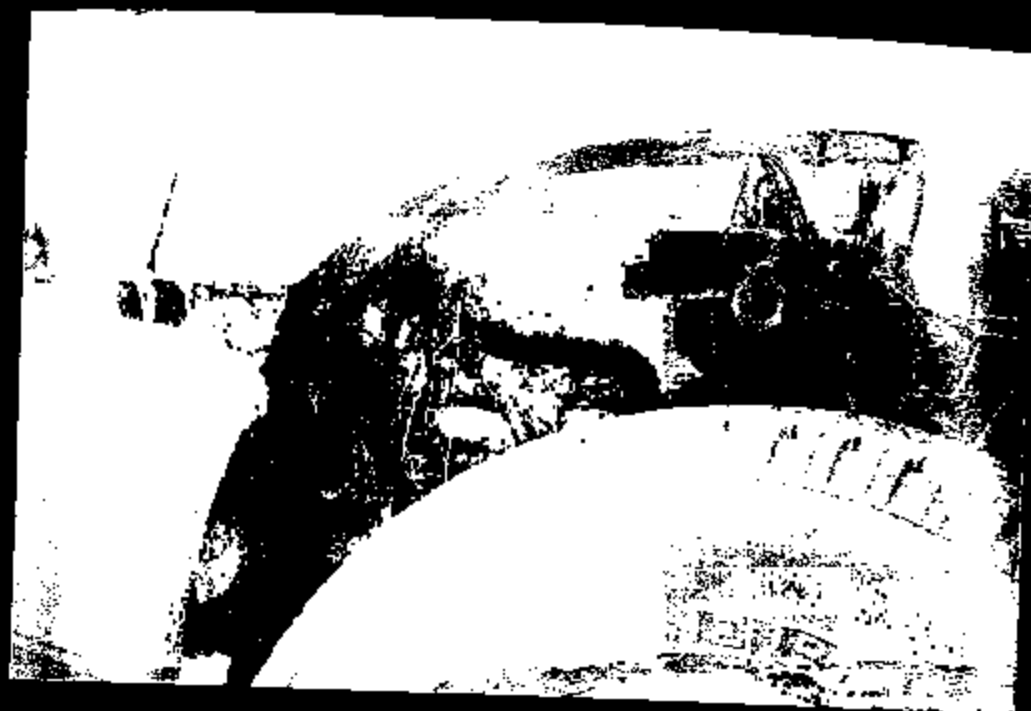
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ERG-885-LC1-1888



EROS-625-LC1-1857

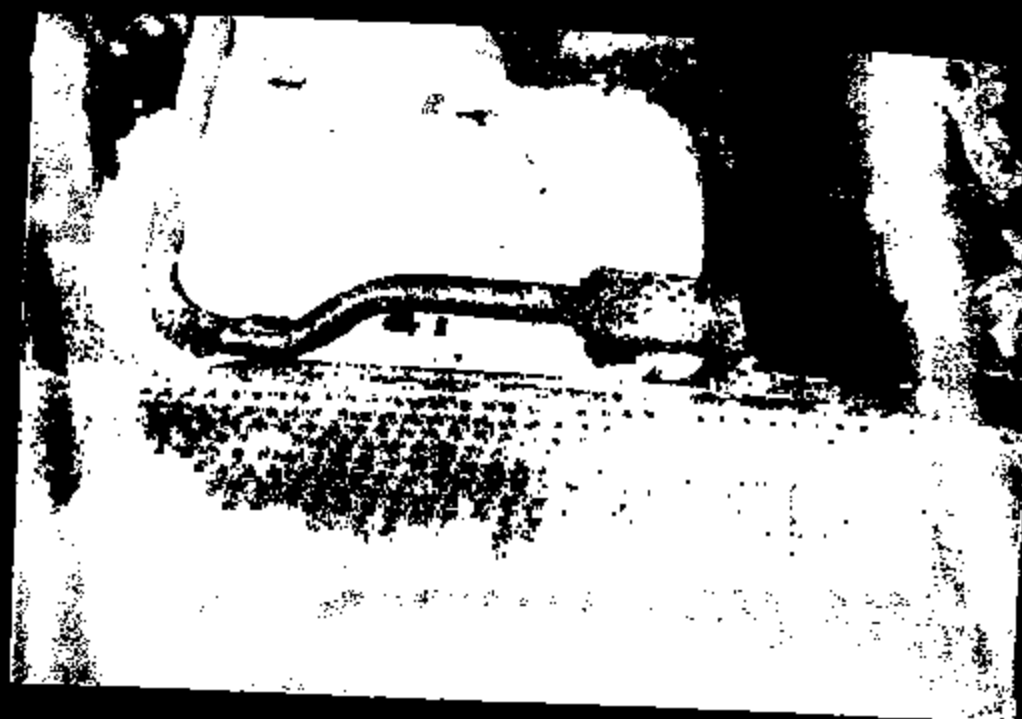


DA05-000-1C1-1808



1005-000-LC1-1000





EA05-003-LC1-1078



EDOS-885-LC1-1871



EA88-005-LC1-1872



EA05-005-LC1-1873



ER65-885-LC1-1874



ERG5-005-LC1-187B



ERBS-005-LC1-1876



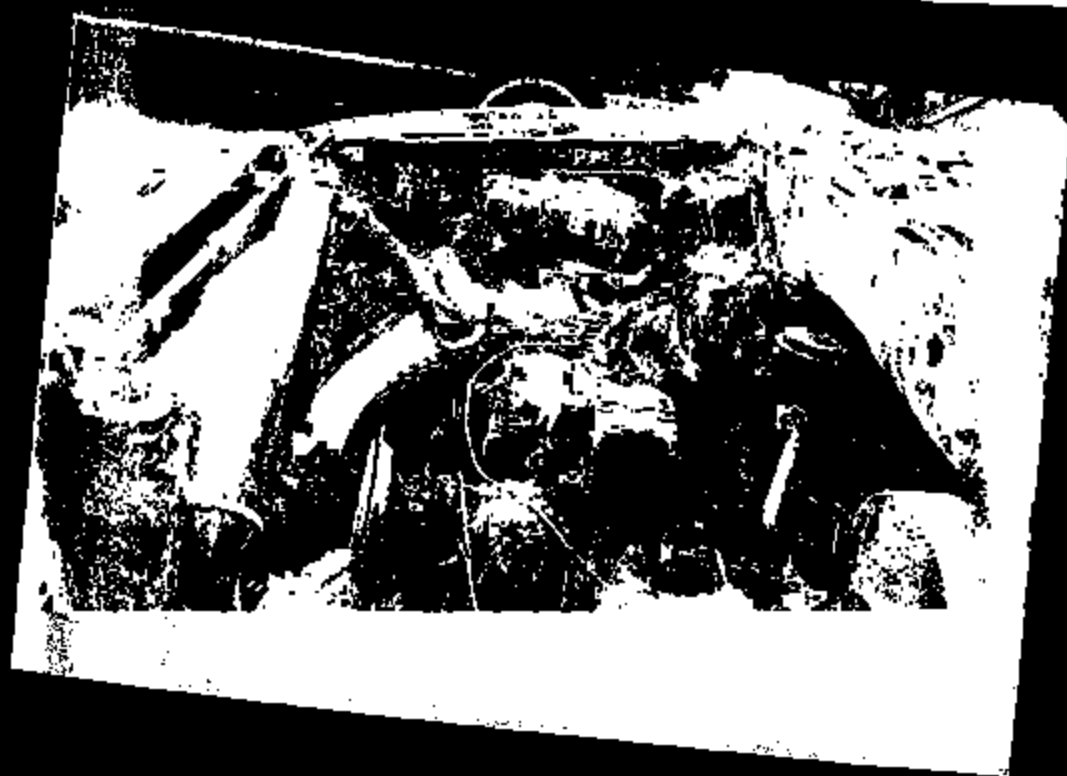
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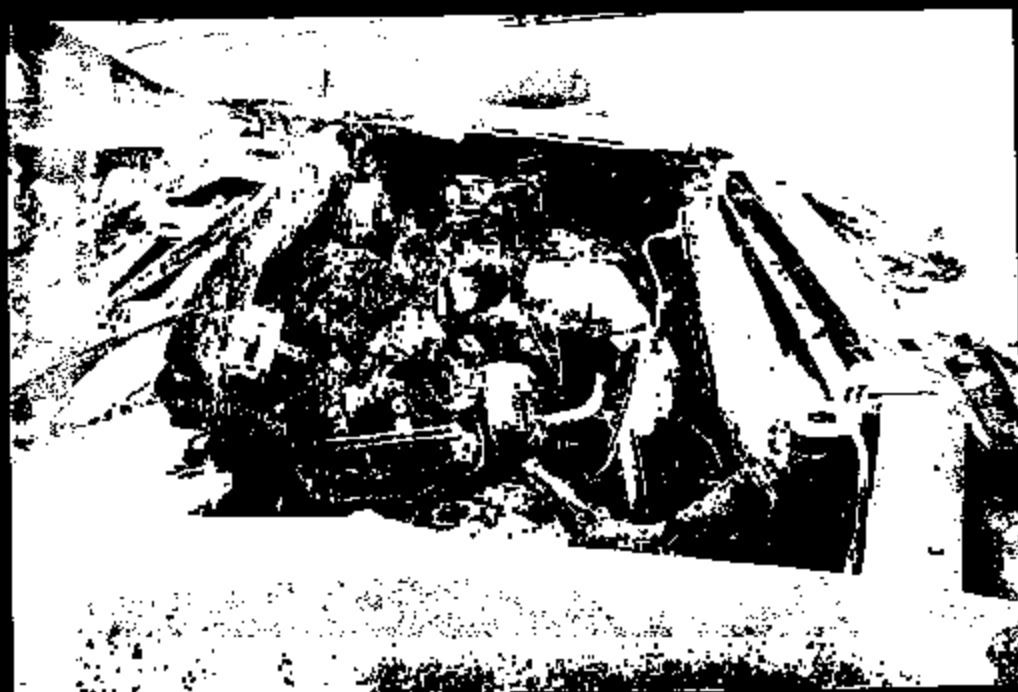


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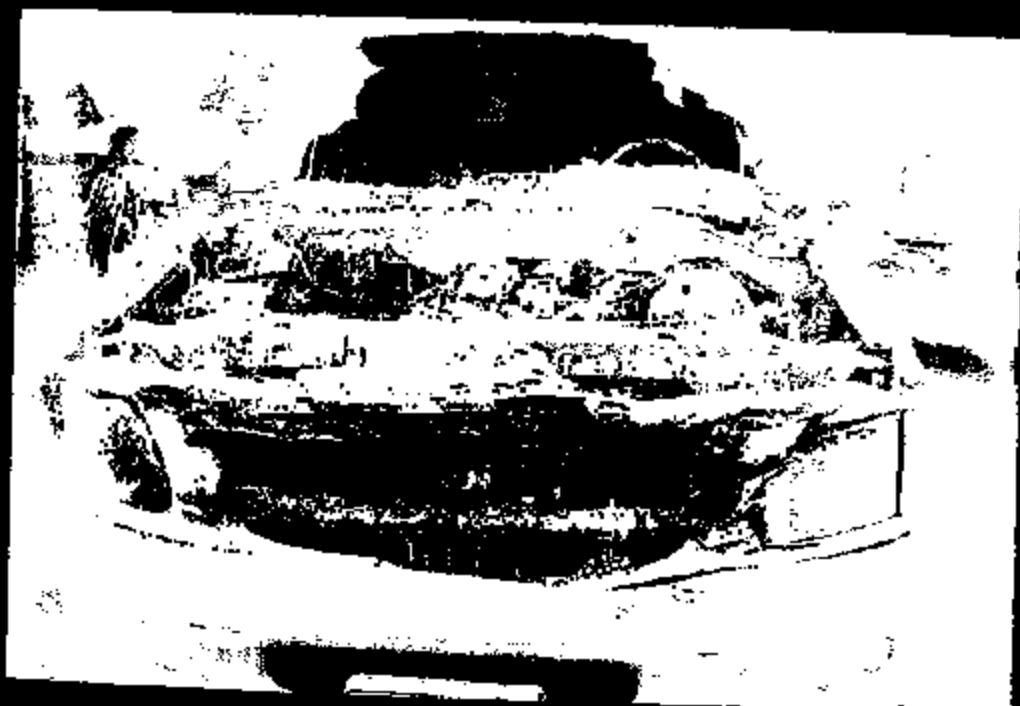
26,013.58  
657.88



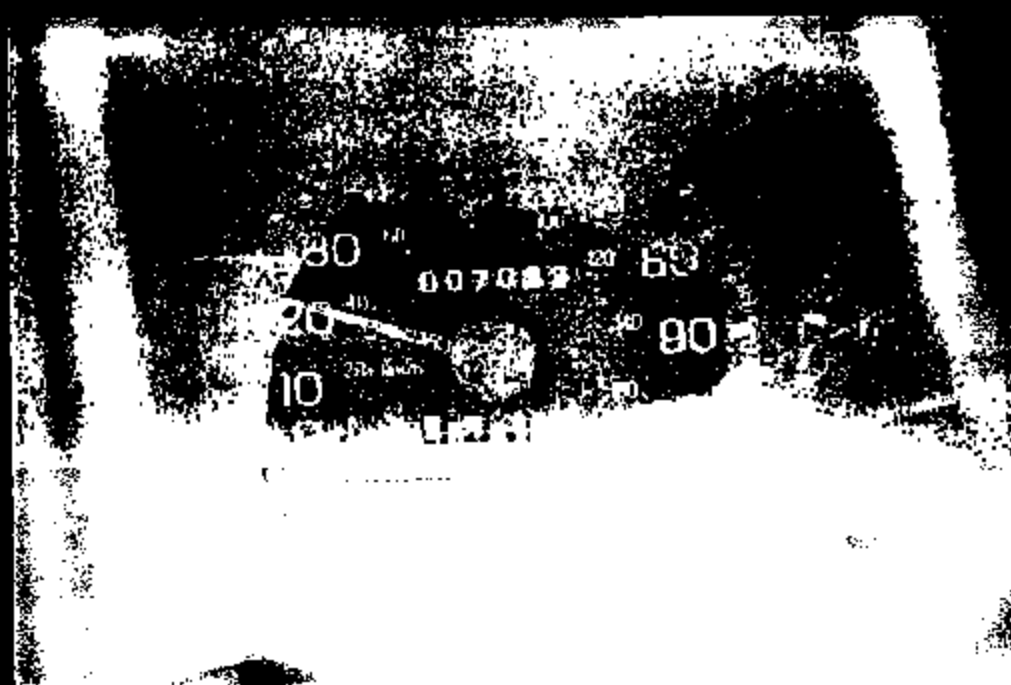
EP05-005-LC1-1800



E085-005-LC1-1881



EP05-006-LC1-1882



ER05-885-LC1-1682

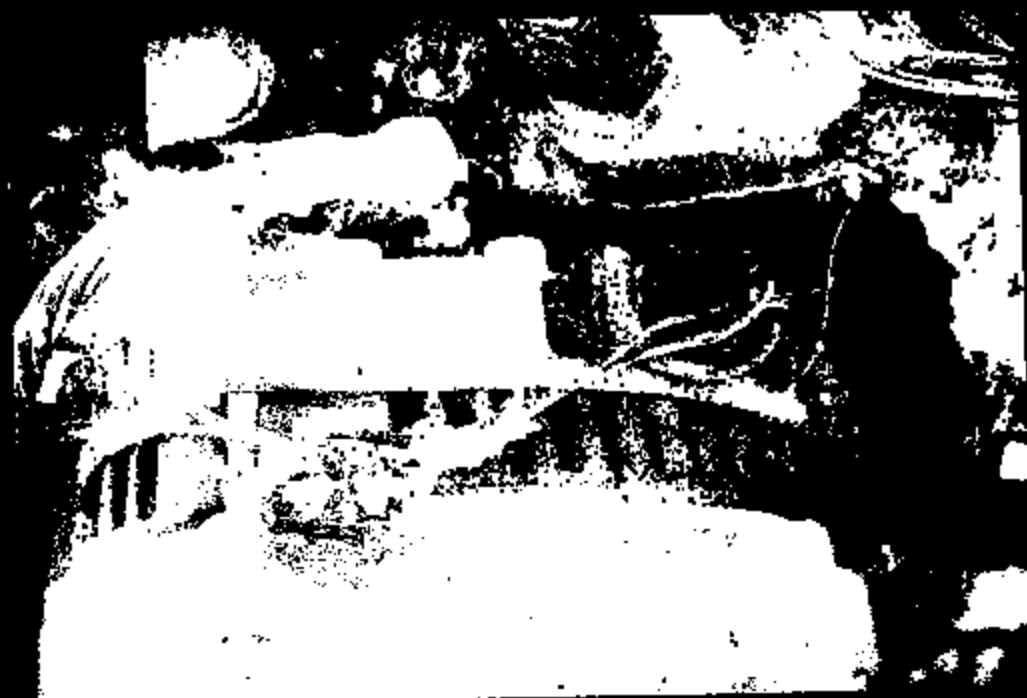
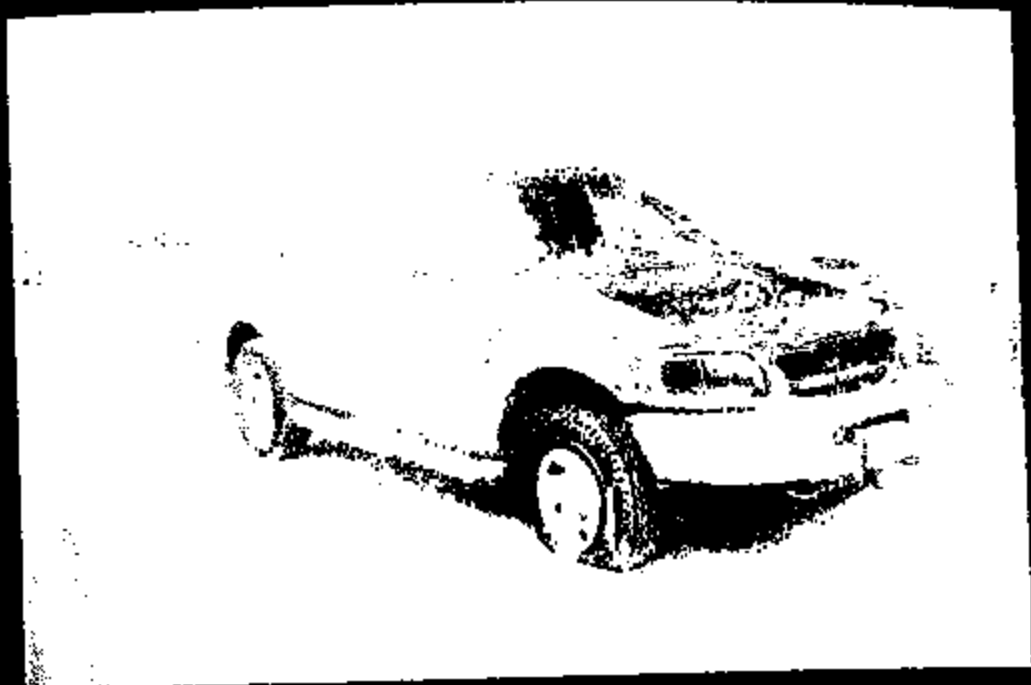


ERG-005-LC1-1234

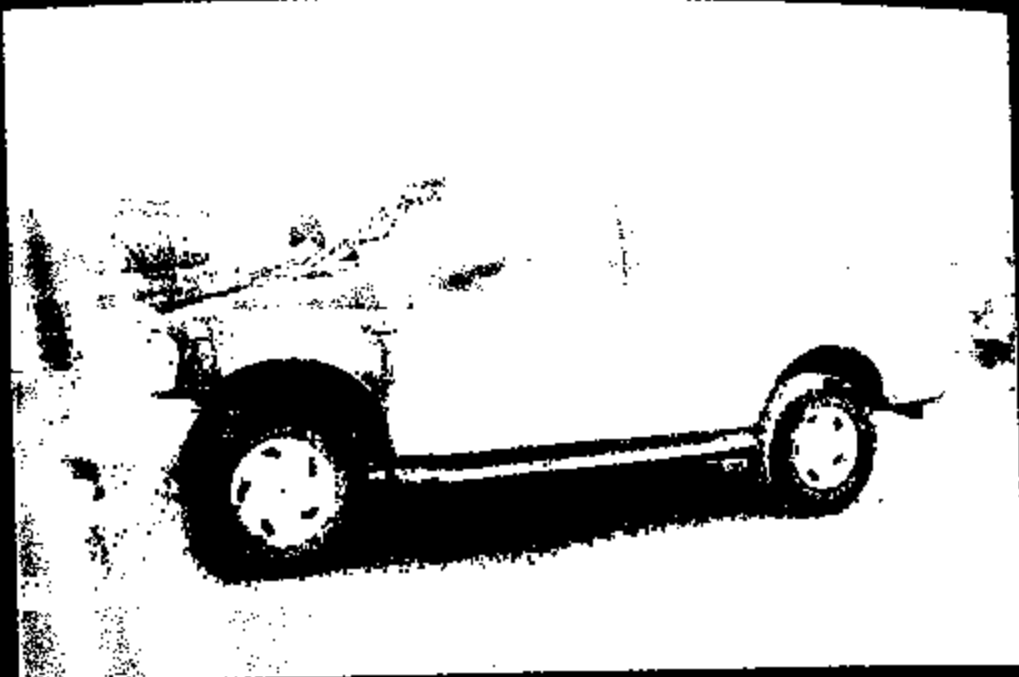


ERG-005-LC1-1000





ER05-003-LC1-1088



ENR6-825-LC1-1887



ER05-005-LC1-1888



MFD. BY FORD MOTOR CO. IN U.S.A.

DATE: 08/98

GWR: 7200LB / 3265KG

FRONT GAWR: 3450LB

REAR GAWR: 4120LB

1564KG

WITH

1872KG

WITH

P265/70R17SL

TIRES

P265/70R17SL

TIRES

17X7.5J

RIMS

17X7.5J

RIMS

AT 207 kPa/30

PSI COLD

AT 241 kPa/35

PSI COLD

THIS VEHICLE CONFORMS TO ALL APPLICABLE FEDERAL MOTOR  
VEHICLE SAFETY, BUMPER, AND THEFT PREVENTION STANDARDS  
IN EFFECT ON THE DATE OF MANUFACTURE SHOWN ABOVE.

VIN: 1FMPUJ7820V

TYPE: MPV

F0199

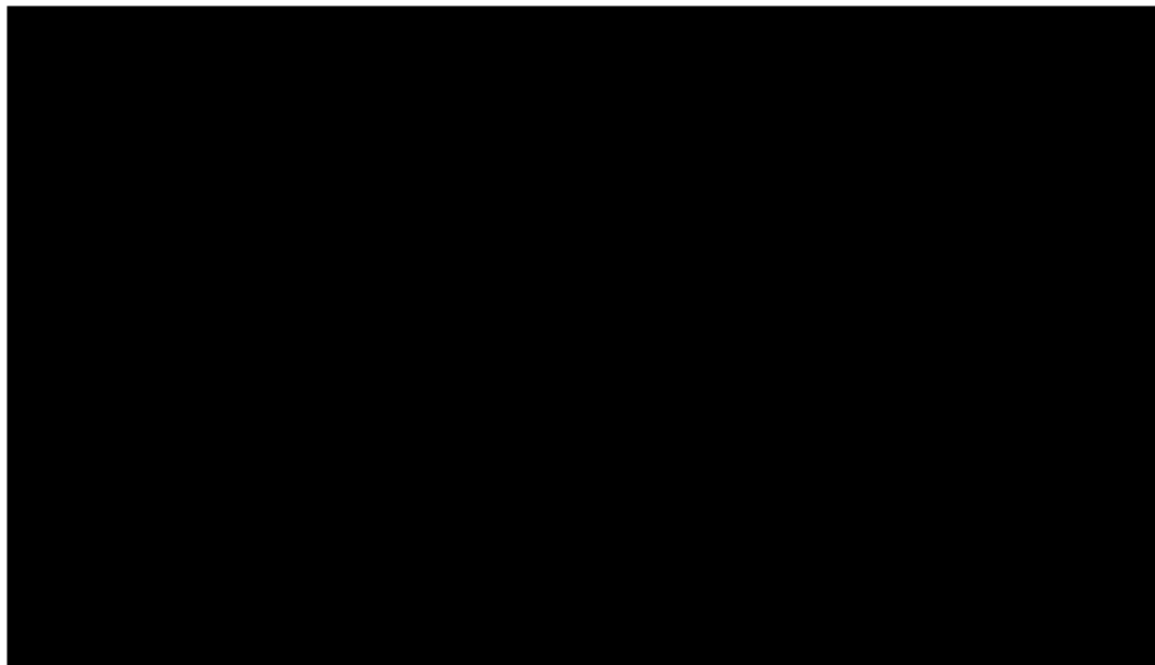
T0027



EXT. INT.	YN	1RC: 56	DSO
WB	DRK	INT	TR
1T9	4	AK2	TP/PS
		8	H6
		UTC	E 15

9 FMS0152047Z.M

2005-005-LC1-1889





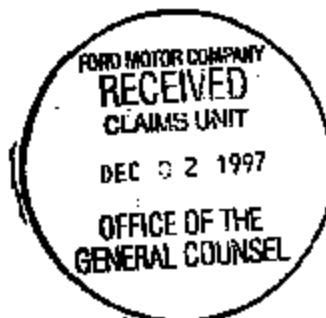
3378 WEST MARKET STREET \* AKRON OH 44333 \*

November 25, 1997

Ford Motor Company  
Parklane Towers West  
Suite 400  
Three Parklane Boulevard  
Dearborn, Michigan 48128-2588

OUR INSURED : [REDACTED]  
OUR CLAIM NUMBER : [REDACTED]  
YOUR INSURED : [REDACTED]  
YOUR INSURED'S ADDRESS : [REDACTED]  
[REDACTED] PARK LANE BLVD  
DEARBORN MI [REDACTED]

YOUR CLAIM NUMBER : unknown  
DATE OF ACCIDENT : 02-12-1997  
COMPANY LOSS : \$14,061.81  
LESS (SALVAGE) : \$730  
DEDUCTIBLE : \$0  
TOTAL AMOUNT DUE : \$13,331.81



Pursuant to your request, enclosed please find the following:

1. A complete description of the incident, including events which occurred prior to and subsequent to the loss.  
[REDACTED] had just returned from fishing and was ascending the hill at Northampton when the 1996 Ford F-150 he was operating sputtered. At the top of the hill, the driver smelled what seemed like wires burning and he pulled over to open the hood to check for the source of the smell. When the driver opened the hood there was fire on the far wall. [REDACTED] began throwing snow on the fire to put it out when something near the carburetor "blew" causing some type of flammable fluid to spew out. The entire engine and cab of the truck burned. Several passersby called the fire department. It took them 15-20 minutes to arrive on the scene. Peninsula Police Department and Valley Fire Department took reports. [REDACTED] states that he has never had any problem with the vehicle before and had planned to take it on a trip to the Indy 500 the following weekend.
2. A copy of the police and/or fire report.  
Ohio law requires the following: Any person who, with intent to defraud or knowing that he/she is facilitating a fraud against an insurer, submits an application or files a claim containing a false or deceptive statement is guilty of insurance fraud.

111-00000-07

ENOS-005-1-01-1000

PRODUCED BY FORD



See attached.

3. The vehicle year, model, and serial number.  
1996 Ford F150. VIN: 1FTEF15N2TN [REDACTED]
4. The mileage on the vehicle at the time of the accident.  
15,000 - non actual
5. Original photographs of the vehicle's collision/fire damage, from several different angles, or color laser copies.  
See attached.
6. What is the alleged defect?  
Defect unknown.
7. Documentation to substantiate your defect allegation, including a copy of your expert's report and the expert's original photographs.  
See attached documents supporting loss. Defect is unknown.
8. Has the alleged defective part been repaired or replaced?  
No, this was a total burn.
9. The present location of the alleged defective part and vehicle.  
Joe Horisk's Salvage Pool Systems, 286 E. Twinsburg Rd., Northfield OH 44067
10. The repair estimate, repair order, or your total loss worksheet for the vehicle's damage, and copies of draft payments.  
See attached.
11. A complete service history for the subject vehicle, including any tune ups or oil-changes.  
None available.
12. List any after market additions or modifications that were made to the vehicle.  
Not applicable or not known to be applicable.

We consider the total amount due listed above to be payment in full, but will promptly notify you if we incur any additional costs. No attorney is representing our subrogation interests at this time.

We appreciate your prompt attention to this matter.

Ohio law requires the following: Any person who, with intent to defraud or knowing that he/she is facilitating a fraud against an insurer, submits an application or files a claim containing a false or deceptive statement is guilty of insurance fraud.



NATIONWIDE MUTUAL INSURANCE COMPANY  
BEVERLY PROCTOR-DONALD  
Claims Department  
330-873-2113

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1 01 - 00000-02

5905-005-LC1-1092





4402-078 DRIVER UNIT ONE STATED HE WAS EAST BOUND ON NORTAMPTON RD WHEN HE SMELLED SOMETHING COMING FROM ENGINE COMPARTMENT. STOPPED VEHICLE AT RIGHT SIDE OF ROAD AND OPENED HOOD AND OBSERVED FIRE STARTING AT REAR OF ENGINE NEAR FIREWALL ON DRIVER'S SIDE. ENGINE, CAB, FRONT TIRES COMPLETELY CONSUME CUNAHOGA FALLS FIRE DEPT PUT FIRE OUT PRIOR TO ARRIVAL

WEATHER 1 NO ADVERSE 2 WEATHER 3 RAIN 4 SNOW 5 FOG 6 HIGH WIND 7 OTHER		1 FIRST HARMFUL EVENT 2 TWO MV IN TRANSPORT 3 PARKED MOTOR VEH 4 PEDESTRIAN 5 ANIMAL 6 TRAMP 7 OTHER CYCLE 8 OTHER MOTOR V 9 POOL OBJECT 10 OTHER OBJECT 11 NON-COLLISION 12 FALL FROM OR IN VEH 13 OVERTURNING 14 OTHER NON-COLLISION		17 OFF REPORTING OFFICER	
ROAD CONDITIONS 1 DRY 2 WET 3 SLUSH 4 ICE 5 SLUSH/SLAND 6 OTHER		ONE MV IN TRANSPORT (COLLISION) 7 PARKED MOTOR VEH 8 PEDESTRIAN 9 ANIMAL 10 TRAMP 11 OTHER CYCLE 12 OTHER MOTOR V 13 POOL OBJECT 14 OTHER OBJECT 15 NON-COLLISION 16 FALL FROM OR IN VEH 17 OVERTURNING 18 OTHER NON-COLLISION		NORTAMPTON RD RAILROAD	
LIGHT 1 DAYLIGHT 2 DAWN 3 DUSK 4 DARK NO LIGHTS 5 DARK-LIGHTED 6 OTHER		LOCATION 1 INTERSECTION 2 INTERSECTION-RELATED 3 DRIVEWAY ACCESS 4 RAILROAD CROSSING 5 BRIDGE-PASSING OVER 6 BRIDGE-PASSING UNDER 7 NON-INTERSECTION 8 PRIVATE PROPERTY			
ROAD CONTOUR 1 STRAIGHT LEVEL 2 STRAIGHT GRADE 3 CURVE LEVEL 4 CURVE GRADE		TYPE OF UNIT 1 CAR 2 BUS 3 TRUCK 4 SCHOOL BUS 5 EMERGENCY 6 TAXI 7 MOTOR HOME 8 TRAM 9 FARM VEHICLE 10 FARM EQUIPMENT 11 CONSTRUCTION EQUIP 12 ANIMAL WAGON 13 BICYCLE 14 ALL OTHERS 15 P - PEDESTRIAN		PRE-CRASH ACTIONS 1 DRIVER ACTIONS 2 PEDESTRIAN ACTIONS 3 DRIVER ERROR 4 NON-DRIVER FACTOR	
OCCURRENCE 1 ON ROADWAY 2 OFF RIGHT SIDE 3 OFF LEFT SIDE 4 ON OPPOSITE LANE 5 AT DIVIDED HIGHWAY		SPEED 1 UNIT 2 EST. 3 LEGAL 4 UNIT 5 DRIVER 6 PASS		VEHICLE DEFECTS 1 TURN SIGNALS 2 HEAD LAMP 3 TAIL LAMP 4 BRAKES 5 STEERING 6 TIRE WEAR/OUT 7 BORN OR BUCK TIRE 8 TRAILER EQUIPMENT 9 DEFECTIVE 10 MOTOR VEHICLE 11 DAMAGED FROM 12 PRIOR ACCIDENT 13 OTHER DEFECTS	
SPECIAL AREA 1 ROAD CONSTRUCTION 2 MAINTENANCE AREA 3 SCHOOL ZONE		MC HELMET USE 1 NO HELMET 2 FULL COVERAGE 3 FULL FACIAL COVER 4 OTHER TYPE HELMET		TRUCK LOAD 1 EMPTY 2 PERMISSIBLE LOADS 3 GENERAL FREIGHT 4 METALLIC 5 FLAMMABLE 6 HAZARDOUS GAS 7 HAZARDOUS LIQUID 8 HAZARDOUS SOLID 9 RADIOACTIVE 10 MATERIAL	
		TRAFFIC CONTROL 1 NO CONTROLS 2 STOP SIGN 3 YIELD SIGN 4 TRAFFIC SIGNAL 5 TRAFFIC FLASHERS 6 SCHOOL ZONE 7 RAILROAD CROSINGS 8 RAILROAD FLASHERS 9 RAILROAD GATES 10 CONCRETE BARRICADES 11 POLICE OFFICER 12 PARALLEL MARKINGS 13 OTHER		FIXED OBJECT STRUCK 1 NONE 2 UTILITY POLE 3 TRAFFIC SIGN 4 BROADCAST TOWER 5 CHAINS RAIL 6 FENCE 7 TREE 8 CHALMERS 9 CLIMB 10 DITCH 11 EMBANKMENT 12 BUILDING 13 MAIL BOX 14 CONSTRUCTION 15 BARRICADE 16 FIRE HYDRANT 17 OTHER OBJECT	

# VALLEY FIRE DISTRICT INCIDENT REPORT INFORMATION SHEET

☐ NIFIRS COMPLETED

REPORT NUMBER 136

DATE Oct. -12-97

DAY Wed.

ALARM TIME 21:55

ARRIVAL 22:04

IN SERVICE 22:25

SITUATION FOUND (BUILDING FIRE, ETC.) Car Fire Code 11

ACTION TAKEN (EXTINGUISHMENT, ETC.) Cuy. FLS Fire (WATER)

CODE 11 LOCATION (TWR) Northampton Rd

PROPERTY USE \_\_\_\_\_

ADDRESS 1/2 EAST of AK-Pen Rd.

OCCUPANT \_\_\_\_\_ PHONE \_\_\_\_\_

OWNER \_\_\_\_\_ PHONE \_\_\_\_\_

OWNER'S ADDRESS 2 Pennsylv. OH

METHOD OF ALARM Phone 911 NO. OF FIRE PERSONNEL 5

VEHICLES RESPONDING ENGINES 2914 TANKERS \_\_\_\_\_ OTHERS \_\_\_\_\_

NUMBER OF INJURIES (IF ANY) FIRE PERSONNEL \_\_\_\_\_ OTHERS \_\_\_\_\_ FATAL(?) \_\_\_\_\_

BUILDING DESCRIPTION \_\_\_\_\_

ORIGIN \_\_\_\_\_ CAUSE \_\_\_\_\_ DOLLAR LOSS \_\_\_\_\_

FIRE DESCRIPTION (MATERIAL IGNITED, ETC.) Vehicle Fire

METHOD OF EXTINGUISHMENT Cuyahoga Fall FD Extinguished Fire

SMOKE DETECTOR YES( ) NO( ) OPER( ) SPRINKLER YES( ) NO( ) OPER( )

INSURANCE Nationwide (first national) PHONE \_\_\_\_\_

MOBILE PROPERTY: YEAR 96 MAKE Ford MODEL F150

SERIAL NUMBER \_\_\_\_\_ LICENSE NUMBER \_\_\_\_\_

SUSPICIOUS FIRE YES( ) NO( ) ARSON INVESTIGATOR NOTIFIED YES( ) NO( )

WITNESS STATEMENT ATTACHED YES( ) NO( )

OFFICER IN CHARGE Henderson/Johnson PERSON MAKING REPORT W. H. Hickey

WEATHER CONDITIONS \_\_\_\_\_ TEMP. \_\_\_\_\_ WIND \_\_\_\_\_

USE BACK OF SHEET FOR ANY OTHER IMPORTANT INFORMATION

REVISED 1-16-92

FORM VFDHIS

See Enclosure



ENCLOSURE LC1-1888

201. 10/10/72



ER05-005-LC1-1887



3378 WEST MARKET STREET \* AKRON OH 44333 \*

March 13, 1997

FORD MOTOR COMPANY  
OFFICE OF GENERAL COUNSEL  
PARK LANE TOWER SW  
SUITE 300, 3 PARK LANE BLVD  
DEARBORN, MI 48126

✓  
AC



OUR INSURED : [REDACTED]  
OUR CLAIM NUMBER : [REDACTED]  
YOUR INSURED : FORD MOTOR COMPANY  
YOUR INSURED'S ADDRESS : [REDACTED]

DEARBORN MI [REDACTED]

YOUR CLAIM NUMBER :  
DATE OF ACCIDENT : 02-12-1997  
COMPANY LOSS : \$13,851.81  
LESS (SALVAGE) : \$0 - *unknown currently*  
DEDUCTIBLE : \$0  
TOTAL AMOUNT DUE : \$13,851.81

Here are the supporting papers and a request for payment of our subrogation claim. We consider the total amount due listed above to be payment in full, but will promptly notify you if we incur any additional costs. No attorney is representing our subrogation interests at this time.

We appreciate your prompt attention to this matter.

NATIONWIDE MUTUAL INSURANCE COMPANY  
BEVERLY PROCTOR-DONALD  
Claims Department  
330-873-2113

Ohio law requires the following: Any person who, with intent to defraud or knowing that he/she is facilitating a fraud against an insurer, submits an application or files a claim containing a false or deceptive statement is guilty of insurance fraud.

(11-80008-01

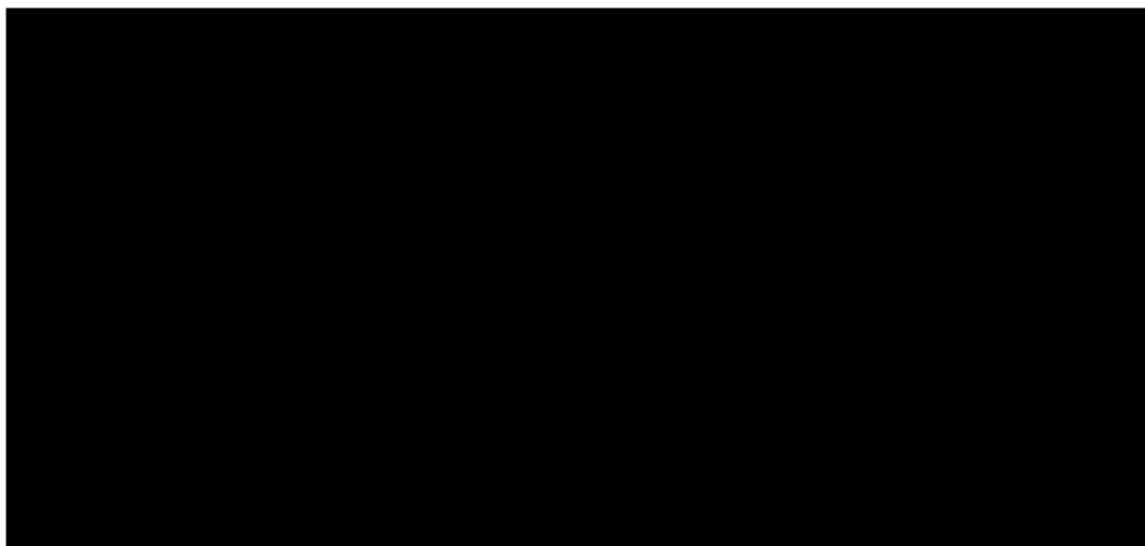
ENCLOSURE 1-11-1997

PRODUCED BY FORD

2-1-1962



WFO-005-LC1-1896





# State Farm Insurance Companies

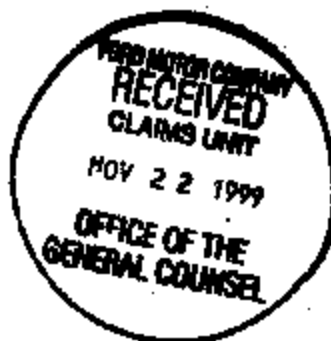


Florida Regional Office  
Fire Centralized Subrogation  
P.O. Box 9608  
Winter Haven, FL 33883-8608

## **CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

November 8, 1999

Ford Motor Company  
Attn: Howard Keyes, Claims Department Manager  
Parkland Tower West, Ste 400  
3 Parklane Boulevard  
Dearborn, MI 48126



Claim Number:

Our Insured:

Loss Address:

Date of Loss:

Make and Model of Vehicle:

VIN Number:

[REDACTED]  
Ft. Lauderdale, FL

April 30, 1999

1996 Ford F-150 Pick-Up Truck

1FTEF15YXT [REDACTED]

Dear Mr. Keyes:

This letter is in reference to fire damage to our insured's home as a result of a vehicle fire. We settled a claim with our insured in the amount of \$56,082.37, which includes our insured's \$500 deductible.

Our investigation revealed the fire originated in the engine compartment of the Ford Pick-Up truck.

Enclosed is the documentation of State Farm's claim. Please consider this letter as a demand to your company for reimbursement of \$56,082.37.

If you need any further information or wish to discuss this matter, please feel free to contact me at the number listed below.

Sincerely,

*Karen Dennis*

Karen Dennis  
Claim Specialist  
STATE FARM FIRE AND CASUALTY COMPANY  
(888) 756-4449, Ext. 3290

KD/056/1108063.160

Enclosures

09 05711

POLICY NO.

DATE LOSS

INSURED

CLAIMANT

PICURE NO.

DATE TIME TAKEN

BY

WEATHER

LOCATION AND VIEW

COMMENTS

ADDITIONAL

INFORMATION

PICTURE NO.

DATE TIME TAKEN

BY

WEATHER

LOCATION AND VIEW

COMMENTS

ADDITIONAL

INFORMATION

OUR FILE NO.

CO. CLM #

8005-805-LO1-1002

59 057718

POLICY NO. \_\_\_\_\_  
DATE/LOSS 4/30/74  
INSURED \_\_\_\_\_

CLAIMANT \_\_\_\_\_

PICTURE NO. \_\_\_\_\_  
DATE/TIME TAKEN 5/4

BY P  
WEATHER \_\_\_\_\_

LOCATION AND VIEW Attic in

COMMENTS gutter

ADDITIONAL  
INFORMATION 1775

PICTURE NO. \_\_\_\_\_  
DATE/TIME TAKEN \_\_\_\_\_

BY \_\_\_\_\_  
WEATHER \_\_\_\_\_  
LOCATION AND VIEW \_\_\_\_\_

COMMENTS \_\_\_\_\_

ADDITIONAL  
INFORMATION 170451

OUR FILE NO. \_\_\_\_\_  
CO. CLAIM # \_\_\_\_\_

ERG-805-LC1-1003



DIRECTIONS:  
PLACE PHOTO(S) IN  
POCKETS. PEEL TAB.  
PRESS PLASTIC PROTECTOR  
FIRMLY TO ADHESIVE.

PH 0577/18  
POLICY NO. \_\_\_\_\_  
DATE/TIME 4/30/99  
INSURED \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
CLAIMANT \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
PICTURE NO. \_\_\_\_\_  
DATE/TIME TAKEN 5/4  
BY *DR*  
WEATHER \_\_\_\_\_  
LOCATION AND VIEW \_\_\_\_\_  
*garage*  
COMMENTS \_\_\_\_\_  
*tools*  
\_\_\_\_\_  
ADDITIONAL  
INFORMATION \_\_\_\_\_  
\_\_\_\_\_  
PICTURE NO. \_\_\_\_\_  
DATE/TIME TAKEN \_\_\_\_\_  
\_\_\_\_\_  
BY \_\_\_\_\_  
WEATHER \_\_\_\_\_  
LOCATION AND VIEW \_\_\_\_\_  
\_\_\_\_\_  
COMMENTS \_\_\_\_\_  
\_\_\_\_\_  
ADDITIONAL  
INFORMATION \_\_\_\_\_  
OUR FILE NO. \_\_\_\_\_  
CO. CLAIM # \_\_\_\_\_

EPSS-005-LC1-1904



POLICY # [REDACTED]  
DATE/TIME [REDACTED]  
INSUREE [REDACTED]  
PICTURE NO. 1  
DATE/TIME TAKEN 5/4  
BY K. [REDACTED]  
WEATHER [REDACTED]  
LOCATION AND VIEW [REDACTED]  
COMMENTS [REDACTED]

ADDITIONAL  
INFORMATION [REDACTED]

PICTURE NO. 2  
DATE/TIME TAKEN 5/4  
BY K. [REDACTED]  
WEATHER [REDACTED]  
LOCATION AND VIEW [REDACTED]  
COMMENTS [REDACTED]  
[REDACTED]

ADDITIONAL  
INFORMATION [REDACTED]  
OUR FILE NO. [REDACTED]  
CO. FILE NO. [REDACTED]

EN65-865-LC1-1985



POLICY NO. [REDACTED]  
 DATE/LOSS 5/1/84  
 INSURED [REDACTED]

CLAIMANT [REDACTED]

PICTURE NO. 3

DATE/TIME TAKEN 5/4

BY K. Brown

WEATHER [REDACTED]

LOCATION AND VIEW LR

view of entry

COMMENTS [REDACTED]

DOCTORS  
 INFORMATION [REDACTED]

PICTURE NO. 4

DATE/TIME TAKEN 5/4

BY K. Brown

WEATHER [REDACTED]

LOCATION AND VIEW LR

view of MR on

COMMENTS [REDACTED]

ADDITIONAL  
 INFORMATION ☐ OVE

OUR FILE NO. [REDACTED]

CO. CLAIM [REDACTED]

EA85-885-LC1-1006





POLICY NO. [REDACTED]  
DATE/LOC [REDACTED]  
INSURED [REDACTED]

CLAIMANT [REDACTED]

PICTURE NO. 5

DATE/TIME TAKEN 5/4

BY K. L. Brown

WEATHER [REDACTED]

LOCATION AND VIEW LR

COMMENTS [REDACTED]

ADDITIONAL

INFORMATION ☐ GVN

PICTURE NO. 6

DATE/TIME TAKEN 5/4

BY K. L. Brown

WEATHER [REDACTED]

LOCATION AND VIEW LR

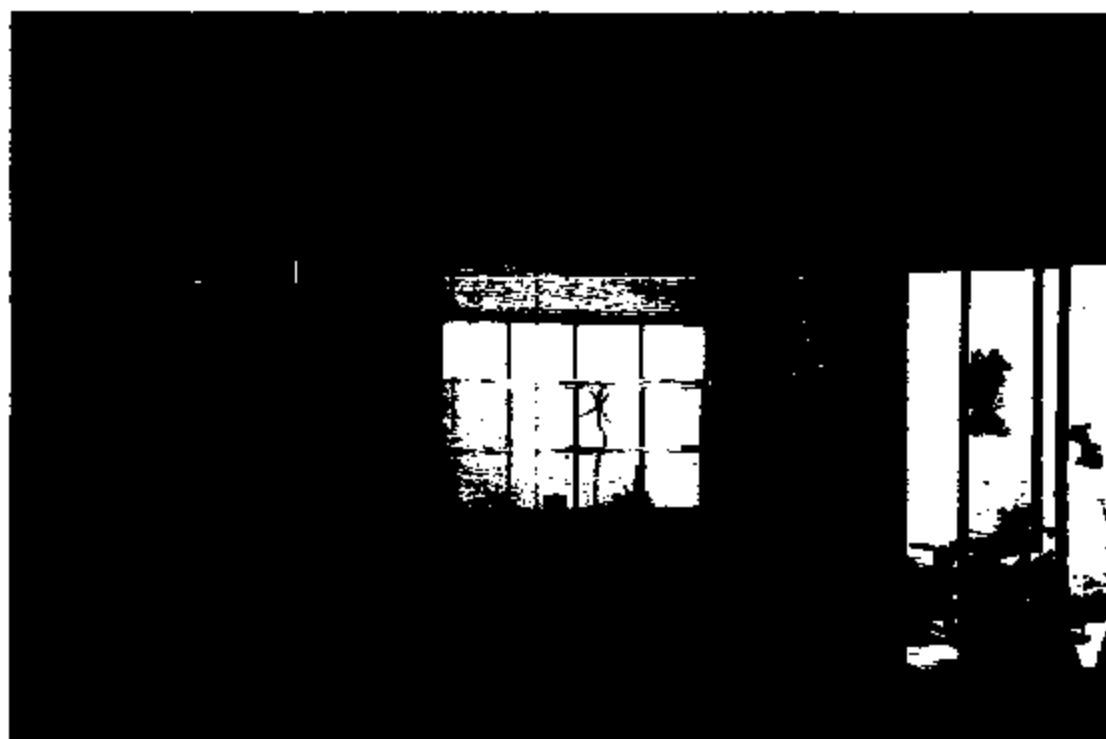
COMMENTS [REDACTED]

ADDITIONAL

INFORMATION ☐ UVER

OUR FILE NO. [REDACTED]

CO. GVN [REDACTED]



EA05-685-LC1-1997



POLICE NO. [REDACTED]  
DATE/LOSS 4/30  
INSURED [REDACTED]

CLAIM NO. [REDACTED]

PICTURE NO. 7  
DATE/TIME TAKEN 5/4

BY K. Brown

WEATHER [REDACTED]

LOCATION AND VIEW Door  
Room - Attached to

COMMENTS [REDACTED]

ADDITIONAL  
INFORMATION COVER

PICTURE NO. 8  
DATE/TIME TAKEN 5/4

BY K. C. Brown

WEATHER [REDACTED]

LOCATION AND VIEW 145A

125A  
COMMENTS [REDACTED]

ADDITIONAL  
INFORMATION COVER

OUR FILE NO. [REDACTED]

CO. CLAIM # [REDACTED]

EP05-205-101-1988



POLICY NO. [REDACTED]

DATE/LOSS 7/20

INSURE [REDACTED]

CLAIMANT

PICTURE NO. 9

DATE/TIME TAKEN 5/4

BY K. Brown

WEATHER

LOCATION AND VIEW BR

HALL

COMMENTS

ADDITIONAL

INFORMATION ☐ COVER

PICTURE NO. 10

DATE/TIME TAKEN 5/4

BY K. L. Brown

WEATHER

LOCATION AND VIEW Colo

BR near Lang

COMMENTS

ADDITIONAL

INFORMATION ☐ COVER

OUR FILE #

CO. GOW # [REDACTED]

EA95-885-LC1-1988



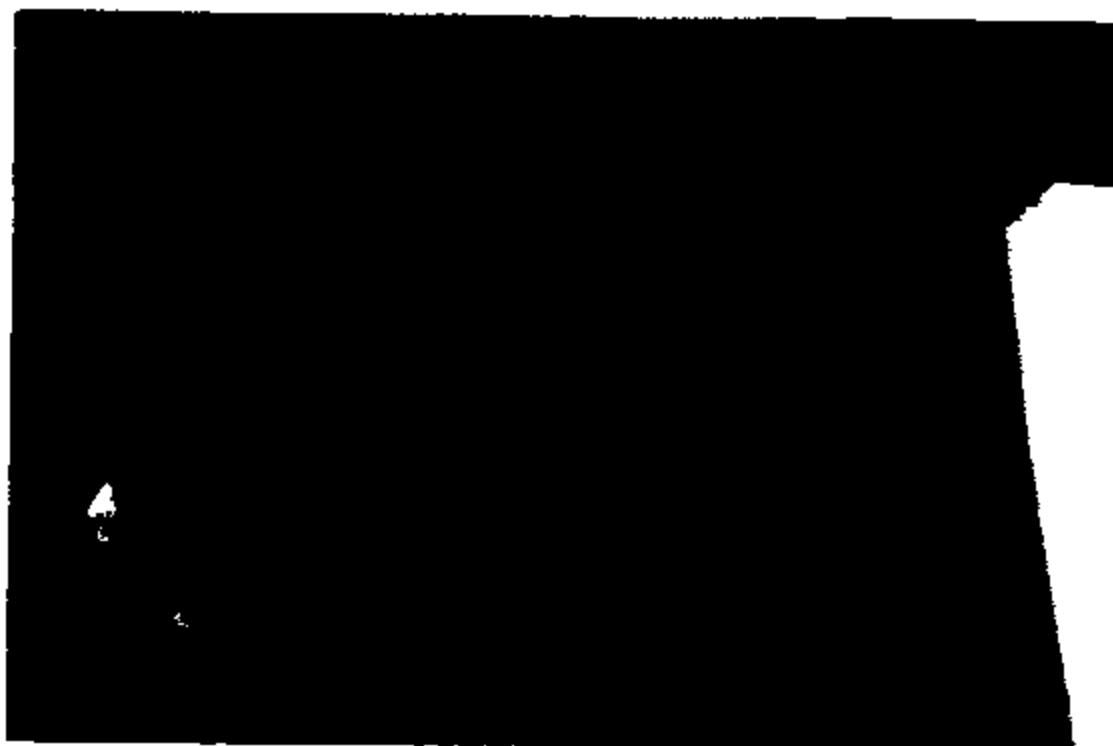
POLICY NO. [REDACTED]  
DATE LOSS 4/30  
INSURED [REDACTED]  
CLAIMANT [REDACTED]  
PICTURE NO. 11  
DATE/TIME TAKEN 5/4  
BY K. L. Parnell  
WEATHER [REDACTED]  
LOCATION AND VIEW Kit  
COMMENTS Upper Deck

ADDITIONAL  
INFORMATION ☒ COVER

PICTURE NO. 12  
DATE/TIME TAKEN 5/4  
BY K. L. Parnell  
WEATHER [REDACTED]  
LOCATION AND VIEW Kit  
Lower cabinet  
COMMENTS [REDACTED]

ADDITIONAL  
INFORMATION ☐ COVER  
OUR FILE NO. [REDACTED]  
CO. CLAIM [REDACTED]

ERG5-885-LC1-1918



FOUR 90  
DATE/LOS  
INSURED

CLAIMANT

PICTURE NO. 13  
DATE/TIME TAKEN 5/4

BY K. L. Brown

WEATHER

LOCATION AND VIEW

COMMENTS  
LR 3 Driving E

ADDITIONAL  
INFORMATION

PICTURE NO. 14  
DATE/TIME TAKEN 5/4

BY K. L. Brown

WEATHER

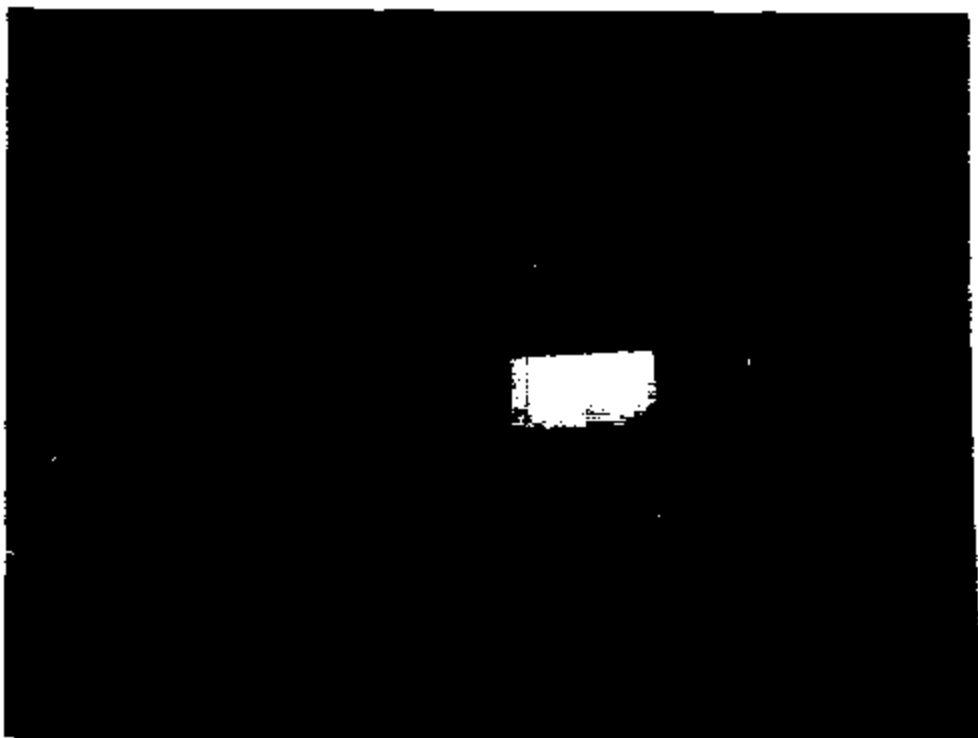
LOCATION AND VIEW

COMMENTS  
clear

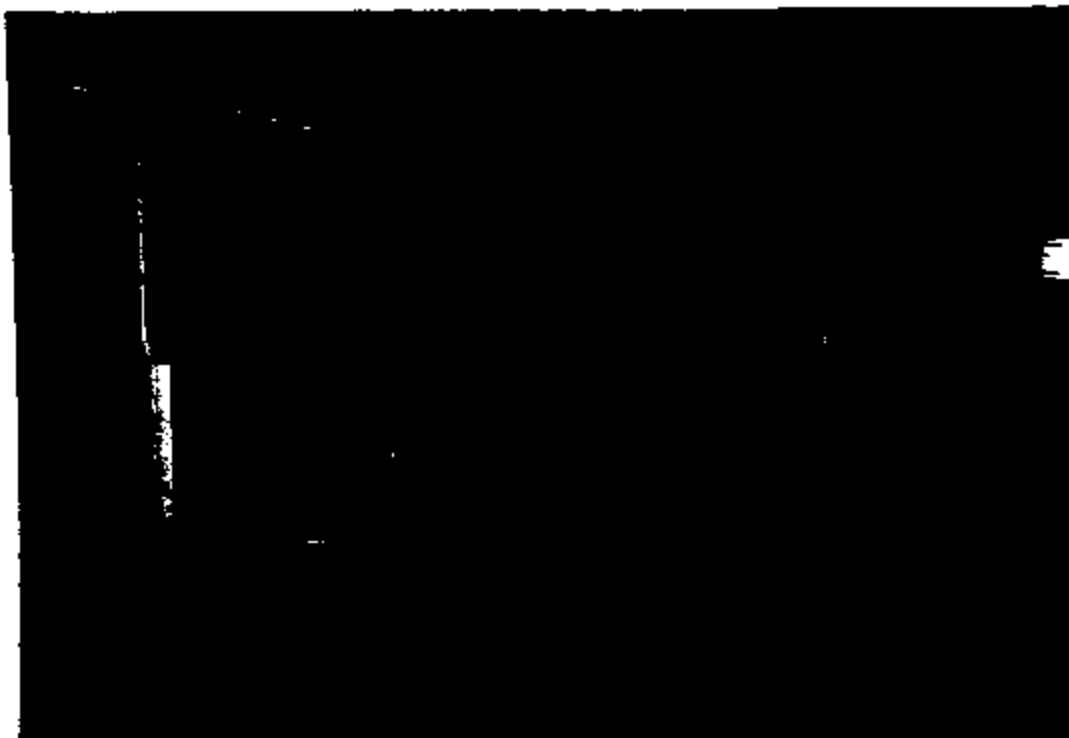
ADDITIONAL  
INFORMATION

OUR FILE NO.

CO. CL



EROS-805-LC1-1911



POLICY NO. [REDACTED]  
DATE/LOSS 6/16  
INSURED [REDACTED]

CLAIMANT \_\_\_\_\_

PICTURE NO. 15

DATE/TIME TAKEN 5/4

BY K. Brown

WEATHER \_\_\_\_\_

LOCATION AND VIEW NB

COMMENTS \_\_\_\_\_

ADDITIONAL  
INFORMATION COVER

PICTURE NO. 16

DATE/TIME TAKEN 5/4

BY K. L. Brown

WEATHER \_\_\_\_\_

LOCATION AND VIEW NB

Brown

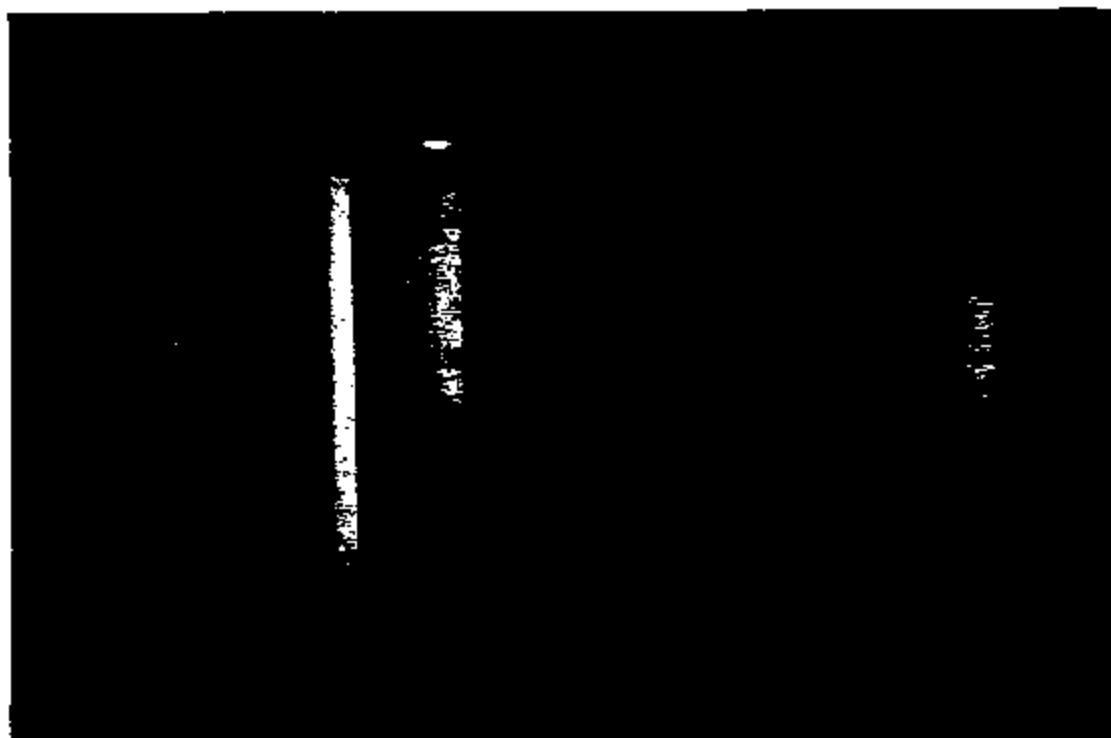
COMMENTS \_\_\_\_\_

ADDITIONAL  
INFORMATION COVER

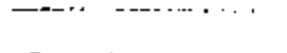
OUR FILE NO. \_\_\_\_\_

CO. CLAIM # [REDACTED]

E005-005-LC1-1012



DELIVERED   
DATE/LOSS 4/20  
INSURED 

CLAIMANT 

PICTURE NO. 17  
DATE/TIME TAKEN 5/4

BY K. Brown

WEATHER 

LOCATION AND VIEW MR  
Bathroom

COMMENTS 

ADDITIONAL  
INFORMATION COVER

PICTURE NO. 18  
DATE/TIME TAKEN 5/4

BY K. Brown

WEATHER 

LOCATION AND VIEW LR  
Carpet

COMMENTS Shower &  
Fire Dmg.

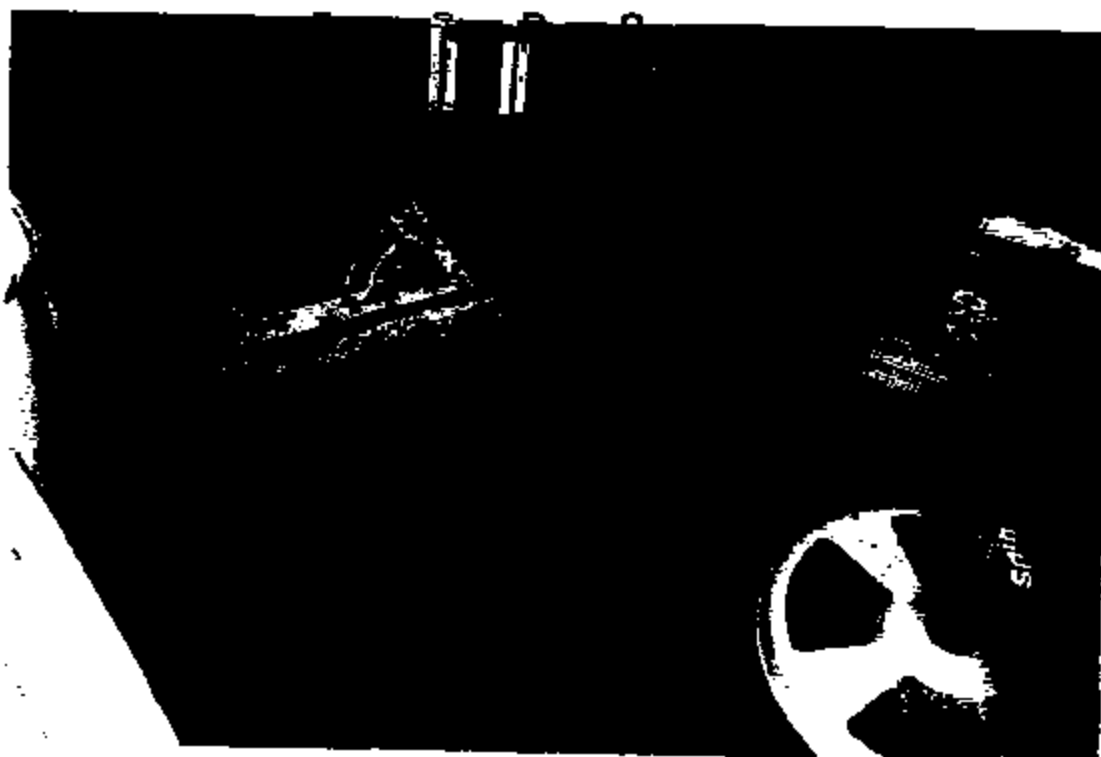
ADDITIONAL  
INFORMATION COVER

OUR FILE NO. 

CO. CLM # 

2000-005-LC1-1913





POLICY NO. [REDACTED]  
 DATE/LOSS 4/1/94  
 INSURED [REDACTED]

CLAIMANT [REDACTED]  
 [REDACTED]  
 [REDACTED]

PICTURE NO. 19  
 DATE/TIME TAKEN 5/4

BY K. Brown  
 WEATHER [REDACTED]  
 LOCATION AND VIEW LR  
carpet  
 COMMENTS Shredder

ADDITIONAL  
 INFORMATION Down

PICTURE NO. 20  
 DATE/TIME TAKEN 5/4

BY K. Brown  
 WEATHER [REDACTED]  
 LOCATION AND VIEW LR  
carpet  
 COMMENTS Light on  
damage

ADDITIONAL  
 INFORMATION Down  
 OUR FILE NO. [REDACTED]  
 CO. CLM # [REDACTED]



EN85-005-LC1-1914

POLICY NO. [REDACTED]

DATE/LOSS

4/30

INSURED

CLAIM NO.

PICTURE NO.

21

DATE/TIME TAKEN

5/4

BY

K. L. Bann

WEATHER

LOCATION AND VIEW

NE  
calm

COMMENTS

thunder

smoke

ADDITIONAL

INFORMATION

☐ YES

PICTURE NO.

22

DATE/TIME TAKEN

5/4

BY

K. L. Bann

WEATHER

LOCATION AND VIEW

NE  
calm

COMMENTS

thunder

ADDITIONAL

INFORMATION

☐ YES

OUR FILE NO.

CO. CLAIM

8885-008-LC1-1019

POLICY NO. [REDACTED]  
DATE/LOSS 7/30  
INSURED [REDACTED]

CLAIMANT \_\_\_\_\_

PICTURE NO. 23  
DATE/TIME TAKEN 5/4

BY R. BERNI

WEATHER \_\_\_\_\_

LOCATION AND VIEW NEB  
Coast

COMMENTS Shoreline  
by the Fire  
Dock

ADDITIONAL  
INFORMATION ☐ COVER

PICTURE NO. 24  
DATE/TIME TAKEN 5/4

BY R. BERNI

WEATHER \_\_\_\_\_

LOCATION AND VIEW NEB  
Coast

COMMENTS Shoreline  
by the Fire Dock

ADDITIONAL  
INFORMATION ☐ COVER

OUR FILE NO. \_\_\_\_\_  
CO. CLM [REDACTED]

ENG-886-LC1-1818





POLICY NO. [REDACTED]

DATE LOSS [REDACTED]

INSURED [REDACTED]

CLAIM NO. [REDACTED]

PICTURE NO. 25DATE/TIME TAKEN 5/4BY K. Brown

WEATHER [REDACTED]

LOCATION AND VIEW LRAt ventCOMMENTS Minor smokedamage to ceiling

ADDITIONAL

INFORMATION ☐ COVERPICTURE NO. 26DATE/TIME TAKEN 5/4BY K. Brown

WEATHER [REDACTED]

LOCATION AND VIEW FRof houseCOMMENTS Smoke insmall damage

ADDITIONAL

INFORMATION ☐ COVER

OUR FILE NO. [REDACTED]

CO. CLAIM #. [REDACTED]



E905-805-1C1-1817



POLICY NO. [REDACTED]  
 DATE/LOSS 4/30  
 INSURED [REDACTED]

CLAIMANT [REDACTED]

PICTURE NO. 27  
 DATE/TIME TAKEN 5/4

BY K. Brown

WEATHER [REDACTED]

LOCATION AND VIEW From Door

COMMENTS Heavy smoke coming in from way

ADDITIONAL INFORMATION [REDACTED]

PICTURE NO. 28  
 DATE/TIME TAKEN 5/4

BY K.L. Brown

WEATHER [REDACTED]

LOCATION AND VIEW From Door

COMMENTS [REDACTED]

ADDITIONAL INFORMATION [REDACTED]

OUR FILE NO. [REDACTED]

CO. CLM [REDACTED]

EA85-085-LC1-1916

POLICY NO. \_\_\_\_\_

DATE LOSS 4/30

INSURE \_\_\_\_\_

CLAIMANT \_\_\_\_\_

PICTURE NO. 27

DATE/TIME TAKEN 5/4

BY K. Brown

WEATHER \_\_\_\_\_

LOCATION AND VIEW Back

COMMENTS Front door is gone

ADDITIONAL

INFORMATION Clue

PICTURE NO. 30

DATE/TIME TAKEN 5/4

BY K. Brown

WEATHER \_\_\_\_\_

LOCATION AND VIEW Back

COMMENTS way to garage

ADDITIONAL

INFORMATION Clue

OUR FILE NO. \_\_\_\_\_

CO. CLM \_\_\_\_\_

EP85-685-LC1-1818



POLICY NO. [REDACTED]  
DATE LOSS 4/90  
INSUR. [REDACTED]

CLAIMANT [REDACTED]

PICTURE NO. 31  
DATE/TIME TAKEN 5/4

BY K. Brown

WEATHER [REDACTED]

LOCATION AND VIEW Good

door

COMMENTS Center by

Door

ADDITIONAL

INFORMATION ☐ OVER

PICTURE NO. 32

DATE/TIME TAKEN 5/4

BY K. Brown

WEATHER [REDACTED]

LOCATION AND VIEW Good

by garage door

COMMENTS [REDACTED]

ADDITIONAL

INFORMATION ☐ OVER

CUR FILE NO. [REDACTED]

CO. CLAIM [REDACTED]

EA05-005-LC1-1020



POLICY NO. [REDACTED]  
DATE/TIME 4/20  
INSURER [REDACTED]

CLAIMANT [REDACTED]

PICTURE NO. 33  
DATE/TIME TAKEN 3/4

BY K. L. Brown

WEATHER

LOCATION AND VIEW Clear

42nd St. garage

COMMENTS

DATE/TIME

INFORMATION

PICTURE NO. 34

DATE/TIME TAKEN 5/4

BY K. L. Brown

WEATHER

LOCATION AND VIEW Dark

42nd St. garage

COMMENTS

ADDITIONAL

INFORMATION

OUR FILE NO.

CO. CLERK [REDACTED]



EROS-885-LC1-1021



POLICY # [REDACTED]  
 DATE LOSS 4/30  
 INSURED [REDACTED]

CLAIMANT [REDACTED]

PICTURE NO. 37  
 DATE/TIME TAKEN 5/4

BY K. Brand

WEATHER [REDACTED]

LOCATION AND VIEW Store

Garage

COMMENTS Smoke from

Exhaust

ADDITIONAL

INFORMATION None

PICTURE NO. 38

DATE/TIME TAKEN 5/4

BY K. Brand

WEATHER [REDACTED]

LOCATION AND VIEW From

view of garage

COMMENTS [REDACTED]

ADDITIONAL

INFORMATION None

OUR FILE NO. [REDACTED]

CD. CERT. [REDACTED]

EP65-085-LC1-1822





POLICY NO. [REDACTED]  
 DATE/LOSS 4/30  
 INSURE [REDACTED]  
 CLAIM NO. \_\_\_\_\_  
 PICTURE NO. 35  
 DATE/TIME TAKEN 5/4  
 BY K. Bernal  
 WEATHER \_\_\_\_\_  
 LOCATION AND VIEW Side  
view of house  
 COMMENTS \_\_\_\_\_

ADDITIONAL  
 INFORMATION ☐ OVER

PICTURE NO. 36  
 DATE/TIME TAKEN 5/4

BY K. Bernal  
 WEATHER \_\_\_\_\_  
 LOCATION AND VIEW Back  
view of house  
 COMMENTS See 35  
is insured

ADDITIONAL  
 INFORMATION ☐ OVER

OUR FILE NO. \_\_\_\_\_  
 CO. FILE NO. [REDACTED]

EOSS-005-LC1-1923





POLICY NO. [REDACTED]

DATE LOSS 5/30

INSURED [REDACTED]

CLAIMANT [REDACTED]

PICTURE NO. 39DATE/TIME TAKEN 5/4BY K. Brown

WEATHER [REDACTED]

LOCATION AND VIEW GarageCOMMENTS Top of car  
w/ tools

ADDITIONAL

INFORMATION ☐ OVERPICTURE NO. 40DATE/TIME TAKEN 5/4BY K. Brown

WEATHER [REDACTED]

LOCATION AND VIEW GarageCOMMENTS Garage door  
open

ADDITIONAL

INFORMATION ☐ OVER

OUR FILE NO. [REDACTED]

CO. CODE [REDACTED]

E925-885-LC1-1924





POLICY NO. [REDACTED]  
DATE LOSS 4/30  
INSURED [REDACTED]

CLAIM NO. \_\_\_\_\_  
\_\_\_\_\_

PICTURE NO. 41  
DATE/TIME TAKEN 5/4

BY K. Beaul  
WEATHER \_\_\_\_\_  
LOCATION AND VIEW Car

COMMENTS Crushed  
Tools

ADDITIONAL  
INFORMATION CLVS

PICTURE NO. 42  
DATE/TIME TAKEN 5/4

BY K. Beaul  
WEATHER \_\_\_\_\_  
LOCATION AND VIEW Car

COMMENTS Wreck

ADDITIONAL  
INFORMATION CLVS

OUR FILE NO. \_\_\_\_\_  
CO. CLM # [REDACTED]



EA85-805-1C1-1925



POLICY NO. [REDACTED]  
 DATE LOSS 4/20  
 INSURED [REDACTED]

CLAIMANT \_\_\_\_\_

PICTURE NO. 43  
 DATE/TIME TAKEN 5/4

BY R. Brown

WEATHER \_\_\_\_\_

LOCATION AND VIEW Car

COMMENTS Rt side

ADDITIONAL  
 INFORMATION \_\_\_\_\_

PICTURE NO. 44  
 DATE/TIME TAKEN 5/4

BY R. Brown

WEATHER \_\_\_\_\_

LOCATION AND VIEW Car

COMMENTS Lt side

ADDITIONAL  
 INFORMATION \_\_\_\_\_

DATE FILED \_\_\_\_\_  
 CO. DIV. [REDACTED]



ERG5-005-LC1-1028



POLICY NO. [REDACTED]  
 DATE/LOSS 4/30  
 INSURED [REDACTED]

CLAIM NUMBER

PICTURE NO. 45  
 DATE/TIME TAKEN 5/4

BY K. Brown  
 WEATHER  
 LOCATION AND VIEW Car

COMMENTS Misc. 1A

ADDITIONAL  
 INFORMATION ☐ COVER

PICTURE NO. 46  
 DATE/TIME TAKEN 5/4

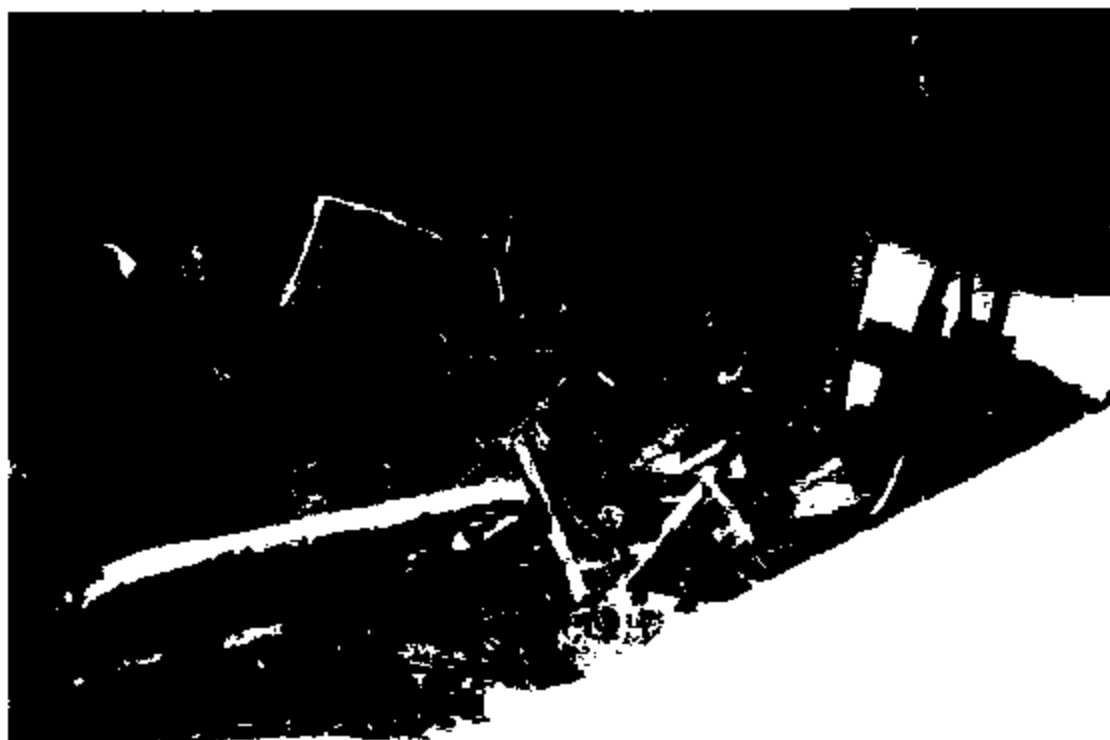
BY K. Brown  
 WEATHER  
 LOCATION AND VIEW Car

COMMENTS

ADDITIONAL  
 INFORMATION ☐ COVER  
 OUR FILE NO.  
 CO. CLAIM # [REDACTED]



EPSS-655-101-1027



POLICY NO. [REDACTED]  
DATE LOSS 4/28  
INSUR [REDACTED]

CLAIMANT \_\_\_\_\_

PICTURE NO. 47  
DATE/TIME TAKEN 5/4

BY K. Bennis  
WEATHER \_\_\_\_\_  
LOCATION AND VIEW from  
floor  
COMMENTS Bulbs

ADDITIONAL  
INFORMATION (CONT)

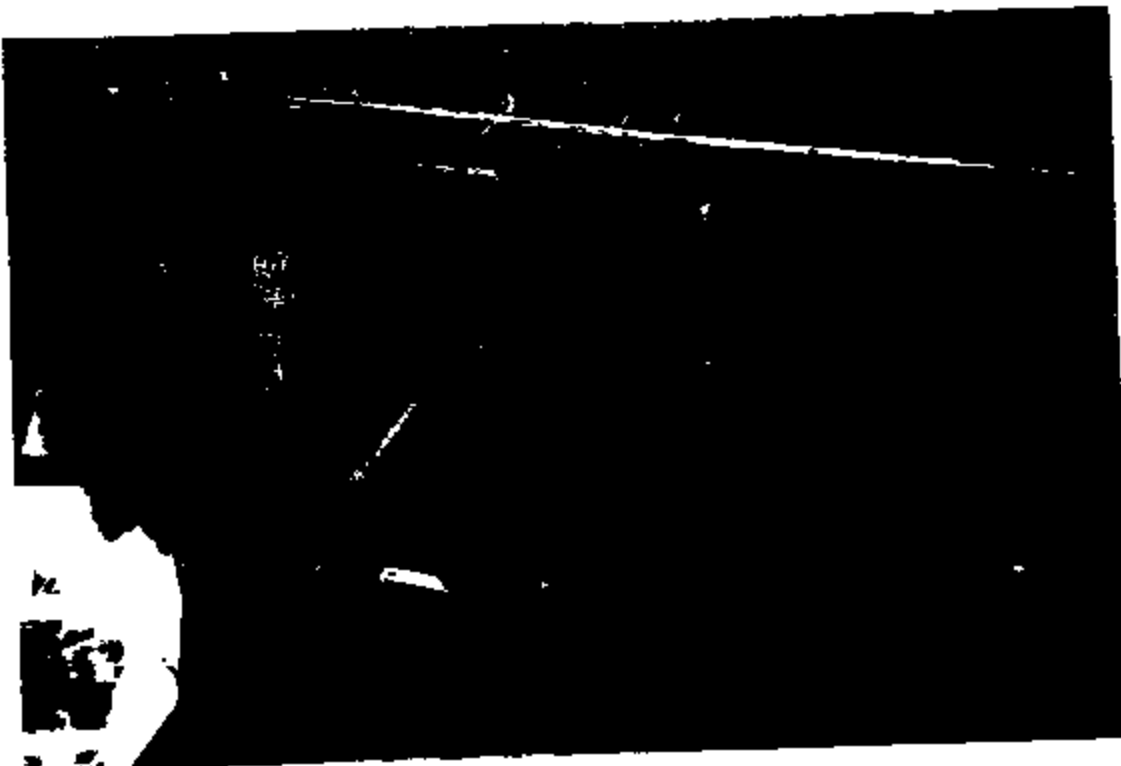
PICTURE NO. 48  
DATE/TIME TAKEN 5/4

BY K. Bennis  
WEATHER \_\_\_\_\_  
LOCATION AND VIEW from  
floor  
COMMENTS \_\_\_\_\_

ADDITIONAL  
INFORMATION (CONT)  
OUR FILE NO. \_\_\_\_\_  
CO. CLAIMS [REDACTED]

EA05-005-LC1-1925





POLICY NO. [REDACTED]  
 DATE LOSS 4/20  
 INSURED [REDACTED]

CLAIMANT \_\_\_\_\_

PICTURE NO. 49

DATE/TIME TAKEN 5/4

BY K. Brand

WEATHER \_\_\_\_\_

LOCATION AND VIEW Car

COMMENTS Side view of skull

ADDITIONAL INFORMATION ☐ COVER

PICTURE NO. 50

DATE/TIME TAKEN 5/4

BY K. Brand

WEATHER \_\_\_\_\_

LOCATION AND VIEW Car

COMMENTS \_\_\_\_\_

ADDITIONAL INFORMATION ☐ COVER

OUR FILE NO. \_\_\_\_\_

CO. CLM [REDACTED]

ENR-885-LC1-1829





POLICY [REDACTED]  
 DATE/LOSS 4/30  
 INSURE [REDACTED]

CLAIMANT [REDACTED]

PICTURE NO. 51

DATE/TIME TAKEN 5/4

BY K. Brown

WEATHER [REDACTED]

LOCATION AND VIEW Car

COMMENTS Shelf - m/s

Tools

ADDITIONAL  
 INFORMATION ☐ YES ☒ NO

PICTURE NO. 52

DATE/TIME TAKEN 5/4

BY K. Brown

WEATHER [REDACTED]

LOCATION AND VIEW Car

Box

COMMENTS Misc -

clothes

ADDITIONAL  
 INFORMATION ☐ YES ☒ NO

OUR FILE NO. [REDACTED]

CO. CLM [REDACTED]



SP05-005-LC1-1838



POLICY NO. [REDACTED]  
 DATE/TIME 4/30  
 INSURED [REDACTED]

CLAIMANT [REDACTED]

PICTURE NO. 53  
 DATE/TIME TAKEN 5/4

BY K. Brown

WEATHER [REDACTED]

LOCATION AND VIEW [REDACTED]  
 ATTIC

COMMENTS Misc. [REDACTED]  
 STAIRS

ADDITIONAL  
 INFORMATION [REDACTED]

PICTURE NO. 54  
 DATE/TIME TAKEN 5/4

BY K. Brown

WEATHER [REDACTED]

LOCATION AND VIEW [REDACTED]  
 ATTIC

COMMENTS Misc. [REDACTED]  
 STAIRS

ADDITIONAL  
 INFORMATION [REDACTED]

OUR FILE NO. [REDACTED]

CO. CLAIM [REDACTED]

ENR5-885-LC1-1831





POLICY NO. [REDACTED]  
 DATE/LOSS 4/50  
 INSURED [REDACTED]

CLAIMANT [REDACTED]

PICTURE NO. 55  
 DATE/TIME TAKEN 5/4

BY K. Baran

WEATHER

LOCATION AND VIEW Car  
 off

COMMENTS Misc. 16  
 shown

ADDITIONAL  
 INFORMATION ☐ OVER

PICTURE NO. 56  
 DATE/TIME TAKEN 5/4

BY K. Baran

WEATHER

LOCATION AND VIEW Car  
 off

COMMENTS Misc. 16  
 shown

ADDITIONAL  
 INFORMATION ☐ OVER

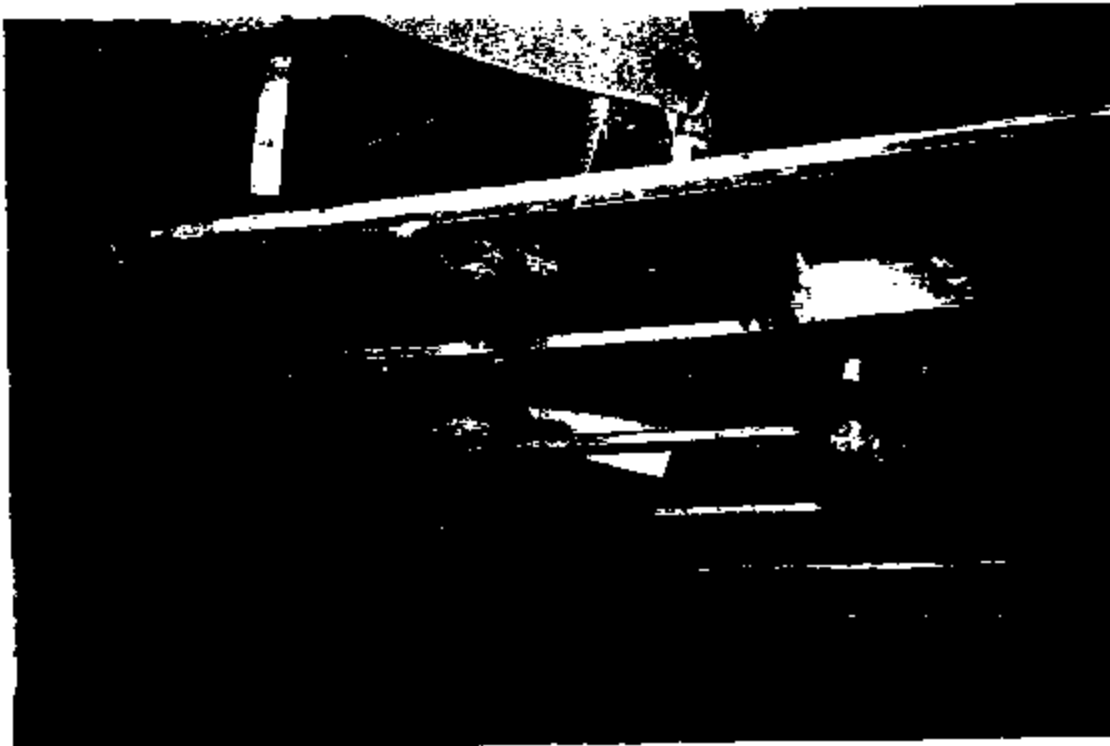
OUR FILE NO.

CO. CLAIM [REDACTED]

ENR-605-LC1-1932







POLICY NO. [REDACTED]  
DATE/LOSS 4/20  
INSURANCE [REDACTED]

CLAIMANT \_\_\_\_\_

PICTURE NO. 57  
DATE/TIME TAKEN 5/4

BY K. Brown

WEATHER \_\_\_\_\_

LOCATION AND VIEW Close  
At the

COMMENTS Also in  
storage

ADDITIONAL  
INFORMATION ☐ COVER

PICTURE NO. 58  
DATE/TIME TAKEN 5/4

BY K. Brown

WEATHER \_\_\_\_\_

LOCATION AND VIEW Close

COMMENTS Truss

ADDITIONAL  
INFORMATION ☐ COVER

OUR FILE NO. \_\_\_\_\_

CO. CLM # [REDACTED]

ENR-885-LC1-1933





DIRECTIONS:  
PLACE PHOTO(S) IN  
POCKETS. PEEL TAB.  
PRESS PLASTIC PROTECTOR  
FIRMLY TO ADHESIVE.

POLICY NO. [REDACTED]  
DATE/LOSS 4/90  
INSURED [REDACTED]

CLAIMANT \_\_\_\_\_

PICTURE NO. 57

DATE/TIME TAKEN 5/4

BY K. Brown

WEATHER \_\_\_\_\_

LOCATION AND VIEW Car

COMMENTS TRUCK

ADDITIONAL  
INFORMATION Car

PICTURE NO. \_\_\_\_\_

DATE/TIME TAKEN \_\_\_\_\_

BY \_\_\_\_\_

WEATHER \_\_\_\_\_

LOCATION AND VIEW \_\_\_\_\_

COMMENTS \_\_\_\_\_

ADDITIONAL  
INFORMATION ☐ OVER

OUR FILE NO. \_\_\_\_\_

CO. CLAIM # \_\_\_\_\_

EP85-885-LC1-1934



POLICY NO. \_\_\_\_\_  
 DATE/LOSS \_\_\_\_\_  
 INSURED \_\_\_\_\_  
 CLAIMANT \_\_\_\_\_  
 PICTURE NO. \_\_\_\_\_  
 DATE/TIME TAKEN \_\_\_\_\_  
 BY \_\_\_\_\_  
 WEATHER \_\_\_\_\_  
 LOCATION AND VIEW \_\_\_\_\_  
 COMMENTS *metal*  
*briefcase*  
*wood case*  
*by hand*  
 ADDITIONAL INFORMATION ☐ OVER  
 PICTURE NO. \_\_\_\_\_  
 DATE/TIME TAKEN \_\_\_\_\_  
 BY \_\_\_\_\_  
 WEATHER \_\_\_\_\_  
 LOCATION AND VIEW \_\_\_\_\_  
 COMMENTS *Cable*  
*dolls &*  
*baby doll*  
 ADDITIONAL INFORMATION ☐ OVER  
 OUR FILE NO. \_\_\_\_\_  
 CO. CLAIM # \_\_\_\_\_



EAG-605-1C1-1935



POLICY NO. \_\_\_\_\_  
 DATE/LOSS \_\_\_\_\_  
 INSURED \_\_\_\_\_  
 \_\_\_\_\_

CLAIMANT \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

PICTURE NO. \_\_\_\_\_

DATE/TIME TAKEN \_\_\_\_\_

BY \_\_\_\_\_

WEATHER \_\_\_\_\_

LOCATION AND VIEW \_\_\_\_\_

COMMENTS *toys*

ADDITIONAL  
 INFORMATION ☐ OVER

PICTURE NO. \_\_\_\_\_

DATE/TIME TAKEN \_\_\_\_\_

BY \_\_\_\_\_

WEATHER \_\_\_\_\_

LOCATION AND VIEW \_\_\_\_\_

*toys*

COMMENTS

ADDITIONAL  
 INFORMATION ☐ OVER

OUR FILE NO. \_\_\_\_\_

CO. CLM # \_\_\_\_\_

8005-805-LC1-1938





POLICY NO. \_\_\_\_\_  
 DATE/LOSS \_\_\_\_\_  
 INSURED \_\_\_\_\_  
 CLAIMANT \_\_\_\_\_  
 PICTURE NO. \_\_\_\_\_  
 DATE/TIME TAKEN \_\_\_\_\_  
 BY \_\_\_\_\_  
 WEATHER \_\_\_\_\_  
 LOCATION AND VIEW \_\_\_\_\_  
 COMMENTS *Conver*  
*road*  
*Living*  
 ADDITIONAL INFORMATION ☒ OVER  
 PICTURE NO. \_\_\_\_\_  
 DATE/TIME TAKEN \_\_\_\_\_  
 BY \_\_\_\_\_  
 WEATHER \_\_\_\_\_  
 LOCATION AND VIEW \_\_\_\_\_  
 COMMENTS *Garage*  
 ADDITIONAL INFORMATION ☐ OVER  
 OUR FILE NO. \_\_\_\_\_  
 CO. CLW # \_\_\_\_\_

EA05-005-LC1-1037

POLICY NO. \_\_\_\_\_  
DATE/LOSS \_\_\_\_\_  
INSURED \_\_\_\_\_  
\_\_\_\_\_

CLAIMANT \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

PICTURE NO. \_\_\_\_\_

DATE/TIME TAKEN \_\_\_\_\_

BY \_\_\_\_\_

WEATHER \_\_\_\_\_

LOCATION AND VIEW \_\_\_\_\_

COMMENTS \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

ADDITIONAL  
INFORMATION ☐ (OVER)

PICTURE NO. \_\_\_\_\_

DATE/TIME TAKEN \_\_\_\_\_

BY \_\_\_\_\_

WEATHER \_\_\_\_\_

LOCATION AND VIEW \_\_\_\_\_

COMMENTS *Trap*  
*box w*  
*tools*

ADDITIONAL  
INFORMATION ☐ (OVER)

OUR FILE NO. \_\_\_\_\_

CO. CLM # \_\_\_\_\_

ER65-885-LC1-1838



POLICY NO. \_\_\_\_\_  
 DATE/LOSS \_\_\_\_\_  
 INSURED \_\_\_\_\_  
 CLAIM NT \_\_\_\_\_  
 PICTURE NO. \_\_\_\_\_  
 DATE/TIME TAKEN \_\_\_\_\_  
 BY \_\_\_\_\_  
 WEATHER \_\_\_\_\_  
 LOCATION AND VIEW \_\_\_\_\_  
 COMMENTS *Craft fair*

ADDITIONAL  
 INFORMATION ☐ OVER



PICTURE NO. \_\_\_\_\_  
 DATE/TIME TAKEN \_\_\_\_\_  
 BY \_\_\_\_\_  
 WEATHER \_\_\_\_\_  
 LOCATION AND VIEW \_\_\_\_\_  
 COMMENTS *Lowee  
Costume*

ADDITIONAL  
 INFORMATION ☐ OVER  
 OUR FILE NO. \_\_\_\_\_  
 CO. CLM # \_\_\_\_\_

ENR5-885-LC1-1939



POLICY NO. \_\_\_\_\_  
DATE/LOSS \_\_\_\_\_  
INSURED \_\_\_\_\_

CLAIMANT \_\_\_\_\_

PICTURE NO. \_\_\_\_\_

DATE/TIME TAKEN \_\_\_\_\_

BY \_\_\_\_\_

WEATHER \_\_\_\_\_

LOCATION AND VIEW \_\_\_\_\_

COMMENTS *train*

*photo*

ADDITIONAL  
INFORMATION ☐ COVER

PICTURE NO. \_\_\_\_\_

DATE/TIME TAKEN \_\_\_\_\_

BY \_\_\_\_\_

WEATHER \_\_\_\_\_

LOCATION AND VIEW \_\_\_\_\_

COMMENTS *by*

*Chalm*

ADDITIONAL  
INFORMATION ☐ COVER

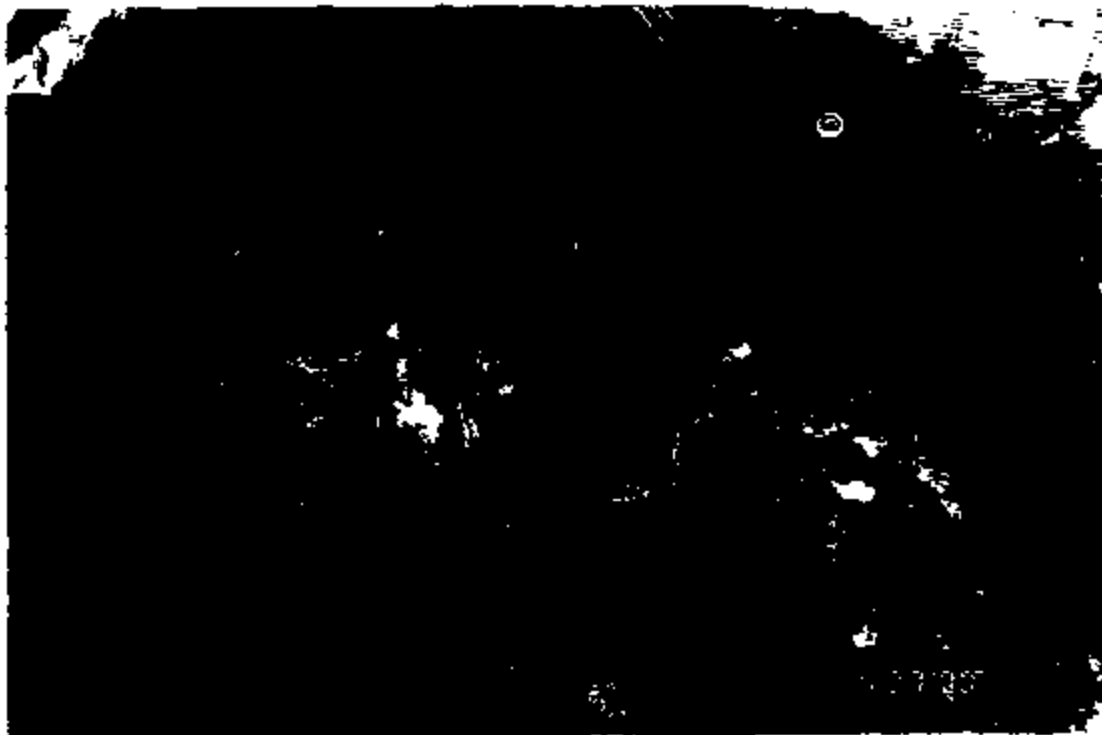
OUR FILE NO. \_\_\_\_\_

CO. CLERK \_\_\_\_\_

FD-302 (Rev. 1-19-60)







POLICY NO. \_\_\_\_\_  
 DATE/LOSS \_\_\_\_\_  
 INSURED State

CLAIMANT \_\_\_\_\_

PICTURE NO. \_\_\_\_\_

DATE/TIME TAKEN \_\_\_\_\_

BY State

WEATHER \_\_\_\_\_

LOCATION AND VIEW \_\_\_\_\_

COMMENTS State  
clothes

ADDITIONAL  
 INFORMATION ☐ OVER

PICTURE NO. \_\_\_\_\_

DATE/TIME TAKEN \_\_\_\_\_

BY \_\_\_\_\_

WEATHER \_\_\_\_\_

LOCATION AND VIEW \_\_\_\_\_

COMMENTS State  
clothes

ADDITIONAL  
 INFORMATION ☐ OVER

OUR FILE NO. \_\_\_\_\_

CO. CLAIM # \_\_\_\_\_

EP85-085-LC1-1841





**THE  
PEPPER  
ENGINEERING  
GROUP, INC.**

RECEIVED  
JUN 14 1999  
SO BROWARD - CSO

Ms. Ileana San Juan  
State Farm Insurance  
Pembroke Pines

RE: Manning residence, State Farm Claim # 59-C577-142

Dear Ms. San Juan:

At your request, I inspected the above noted home, which was located at [REDACTED] Weston, FL [REDACTED]. The purpose of my inspection was to determine the degree of structural damages caused by a recent fire and to make general repair recommendations.

I found a one story, single family home of unknown age, but of modern construction. The walls were masonry and the roof framing system was of wood trusses with plywood sheathing. The home had a concrete tile roof system.

For purposes of this report, it will be assumed that the garage door is in the West to illustrate directions.

The first truss in the North over the garage is not damaged and can be used as is, but the other trusses and jacks South of this truss should be replaced along with all of the plywood over the garage. This repair will necessitate removal and replacement of the roofing system over the garage, but not to include that over the roof that joins the main home and the garage.

It was raining heavily during our visit, and we were unable to access the roof other than to look at it from a ladder. The roof was nail set and no loose tiles existed for us to lift within reach and therefore to determine the tile type. The valleys and ridges were mortar set and matched the field tiles in color. The tile was a reddish brown concrete "S" tile with some texture to the color.

Visual observation clearly illustrated that under 25% of the roof would need to be replaced due to fire, so the 25% rule does not apply and repair is allowed by the South Florida Building Code, Broward County Edition. No other State, County or Local ordinance would require roof replacement, rather than repair of the roof.

The roof tile appears to be one that is currently made, likely a Monier brand, but we could not be

sure without taking a sample or looking at the underside, which we could not do in the rain.

The Public adjuster reported that he had been informed that the color of the tile was not made any more and that in order to repair the roof, that he would have to replace the entire roof. He further reported that the homeowners association rules would not allow a repair of the garage only with tiles of a different color. We observed other homes in the area that had been re-roofed with similar tile, but they had been entirely re-roofed entirely different color.

Based on our experience, it is very likely that the type of tile used, without regard to color or finish, is still manufactured.

We do not have any information on whether the color can be matched as color matching is not a question we have often addressed. If you wish us to make this determination, we would remove a tile and determine if it can be matched. This may cause damage to the tile removed and adjacent tiles and to due to this, we would request that permission of State Farm and the Insured be granted before proceeding. As an alternative to this, if the Insured or the PA could make a tile available to us, it would be easier.

The masonry wall to the North, for approximately 4 feet East of the entry door was damaged to the point that it should be replaced. This repair will require bracing of the roof that joins the garage with the main home.

All other garage walls showed some minor hairline cracks caused by the fire but these cracks are repairable and replacement is not required. The tie beam was not damaged and does not require replacement or repair. Matching the stucco in repair of the walls may be a problem and it may be necessary to completely re-stucco the garage to prevent the repair from showing.

The condition of the concrete slab on grade floor is unknown to us as it was still covered with debris. It is our experience that in automobile fires, which we are informed that this was, that floor damage beneath the car can usually be expected. If damage exists here, it is likely cosmetic only.

If we may be of any further service to you in this matter, please call.

Sincerely,

  
THE PEPPER ENGINEERING GROUP, INC.

John Pepper, P.E.

3 Jun 99

4 Jun 99

P99-206

Subsequent to our fire scene examination, VCI conducted research into the database of the National Highway Traffic Safety Administration, Office of Defects Investigation, regarding the vehicle involved in this fire loss. That data is enclosed with this report, and includes information regarding recalls and complaints concerning this vehicle. It should be noted that no recalls of this vehicle were found in the data that would indicate a fire causal factor within this area of the subject vehicle. However, on page 25 (of 26) of the Complaints section, it should be noted that Complaint #ODI ID: 982878 lists a complaint regarding the electrical system wiring harness under the dash, stating that "harness started coming from underneath the dash, uncertain of where it originated from". Because of the damage of the subject involved vehicle, VCI could not discern whether a wiring harness problem existed. However, the specific problem listed appears to have occurred while the vehicle was being operated, which was not the case with the involved vehicle in this fire loss.

Aftermarket parts installed on this vehicle included an alarm system, which worked with the keyless door lock mechanism. As stated earlier, Mr. Harvey stated that after the fuse for the ABS system was replaced, he had noted that his alarm system was not working properly. Because of fire damage to the vehicle, VCI was unable to reconstruct the alarm system and its associated wiring components. However, it should be noted that the alarm system would have been "hot" (energized) at the time of the fire.

Based upon the foregoing, it is the professional opinion of Vikra Consultants, Inc. (VCI) that the fire which occurred on April 30, 1999, at 1245 Seagrape Circle, in Fort Lauderdale, Florida, had a single point of origin within the 1996 Ford F150 pickup truck that was parked within the garage of the subject residence.

It is further the professional opinion of VCI that this fire had a point of origin within the passenger side of the vehicle, specifically in the area of the engine compartment at the passenger side-dash area. The exact point of fire origin could not be determined because of the degree of fire damage to the vehicle.

It is further the professional opinion of VCI that the exact cause of this fire remains undetermined at this time.

It is further the professional opinion of VCI that this fire was accidental, in that it was not intentionally set. No evidence of a fire of incendiary nature was noted.

Thank you for allowing VCI to be of service to you in this matter. If you have any further questions, please contact us.

Respectfully submitted,

VIKRA CONSULTANTS, INC.

*Robert E. Lemons*

Robert E. Lemons, C.F.E.I.  
President

REU/cg



THE  
PETER  
ENGINEERING  
GROUP, INC.

10.30.2004 10:00 AM

PROJECT

SUBJECT

PROJECT #

P99-206

Photo No.

1



View:

Photo No.

2



View:

ER05-005-LC1-1945



THE  
PEPPER  
ENGINEERING  
GROUP, INC.

101 N. 10th St., Ft. Worth, TX 76102

PROJECT



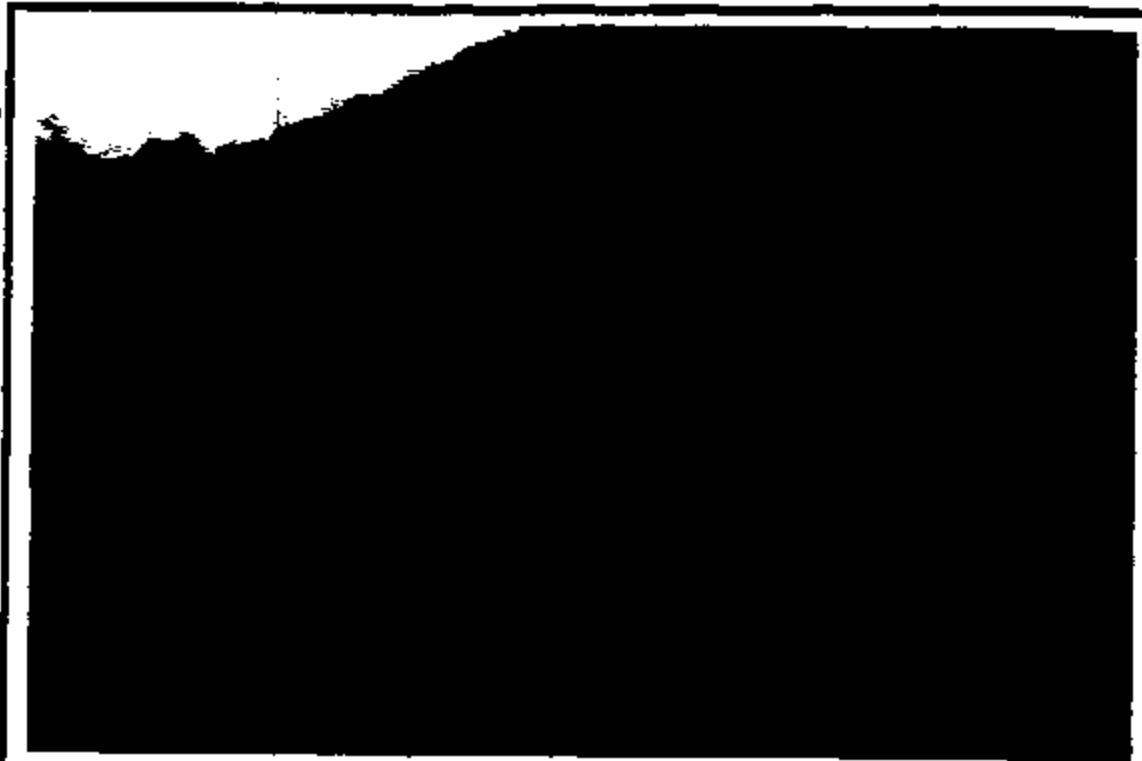
CLIENT

PROJECT #

P99-206

Photo No.

5



View:

Photo No.

6



View:

**PE**  
GROUP

THE  
PEPPER  
ENGINEERING  
GROUP, INC.

101 N. 20th St., Suite 101, Ft. Lauderdale, FL 33304

PROJECT:

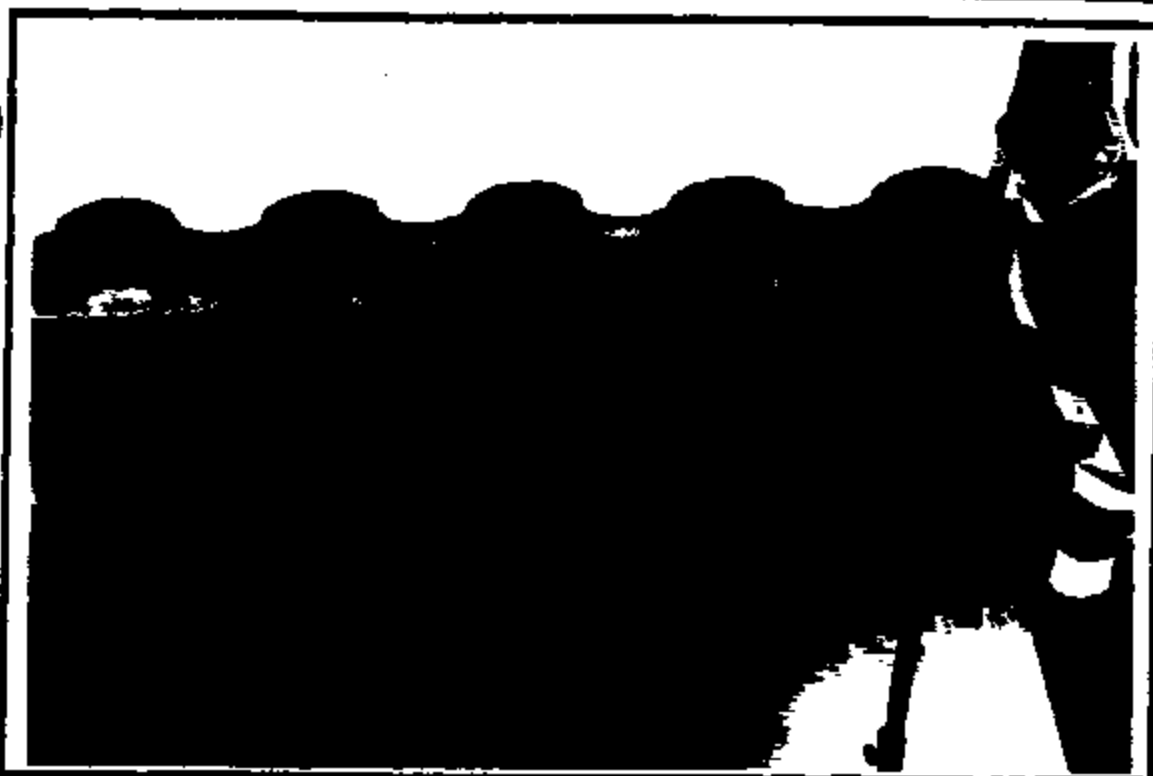
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PROJECT #:

**P99-206**

Photo No.

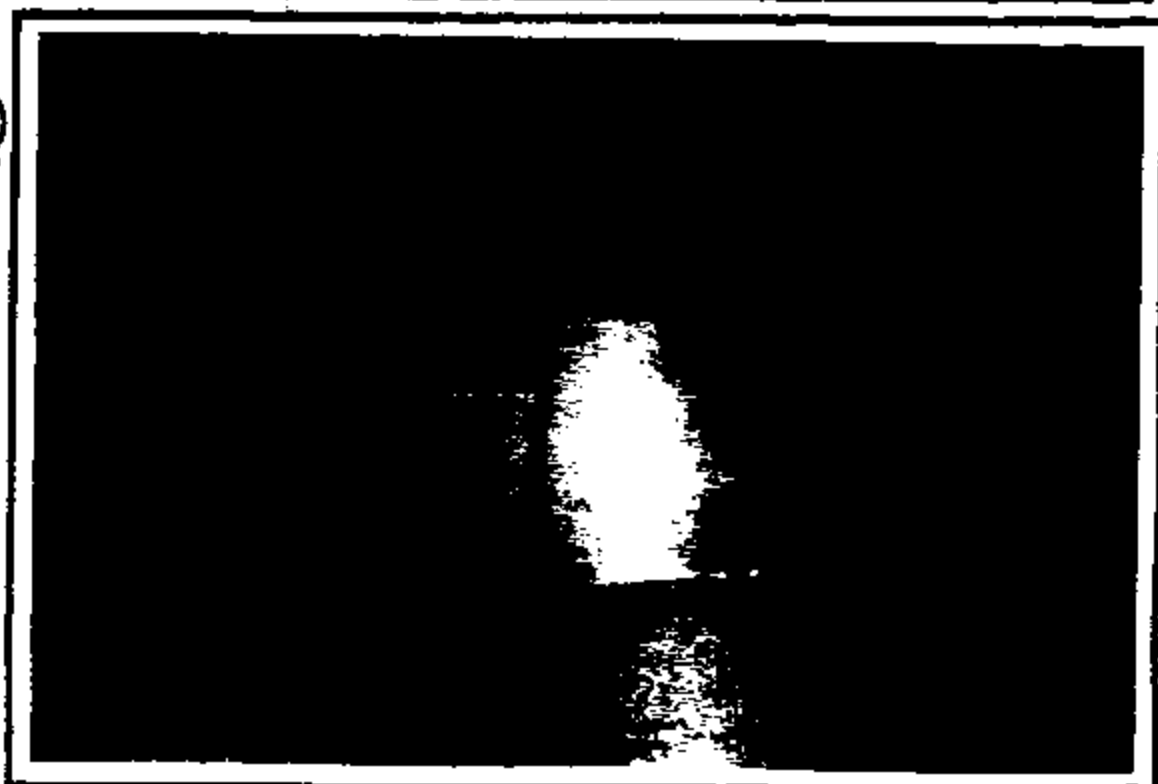
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View:

Photo No.

4



View:

**PE**  
GROUP

THE  
PEPPER  
ENGINEERING  
GROUP, INC.

101 N. 20th St., Suite 11, Miami, FL 33136

PROJECT

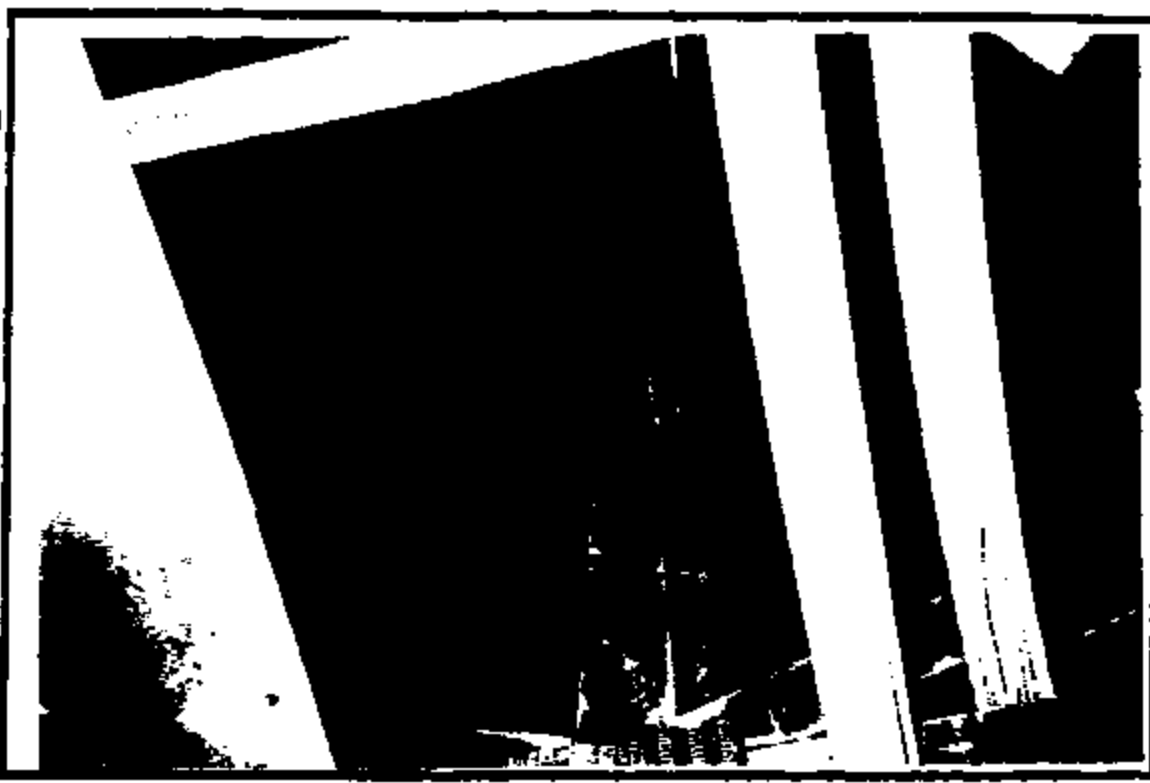
SUBJECT

PROJECT #1

P99-206

Photo No.

7



View:

Photo No.

8



View:





THE  
PEPPER  
ENGINEERING  
GROUP, INC.

10, E. 20th, Suite 11, Miami

PROJECT:

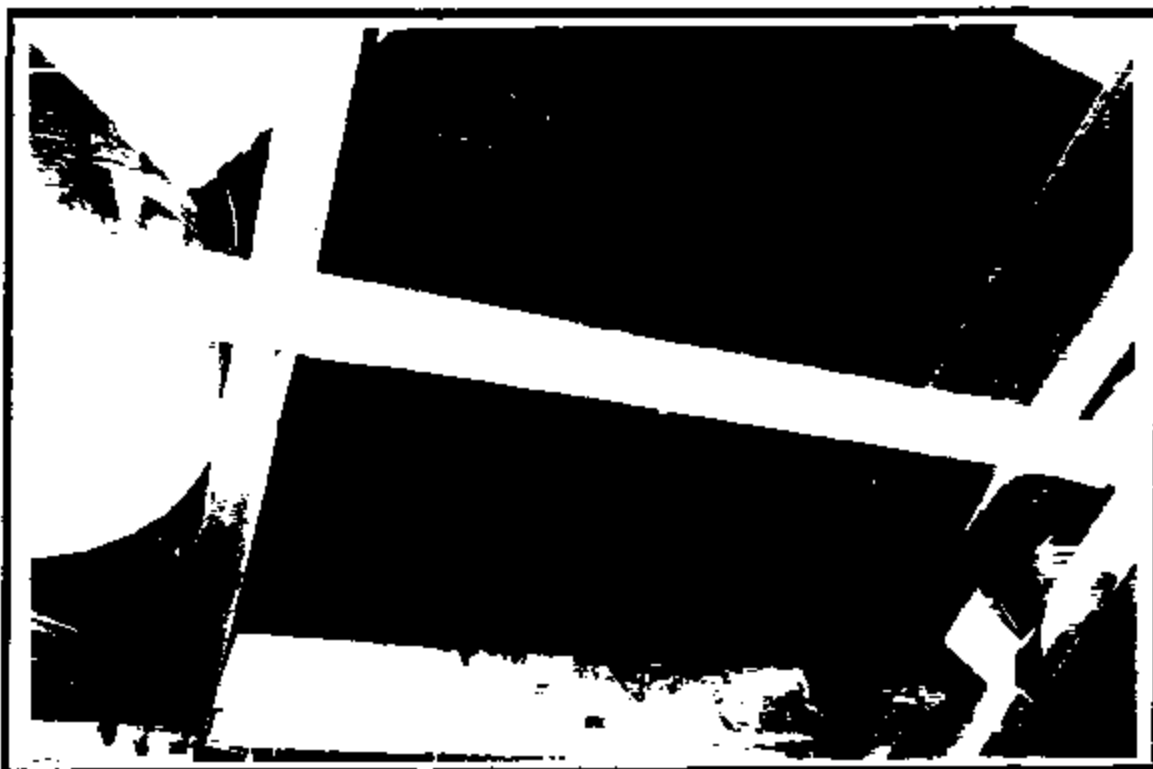
PROJECT #:

P99-206

CLIENT:

Photo No.

9



View:

Photo No.

10



View:

ERG-805-LC1-1948



THE  
PEPPER  
ENGINEERING  
GROUP, INC.

P.O. Box 20044, Houston, TX 77226

PROJECT



PROJECT #

P99-206

SUBJECT

Photo No.

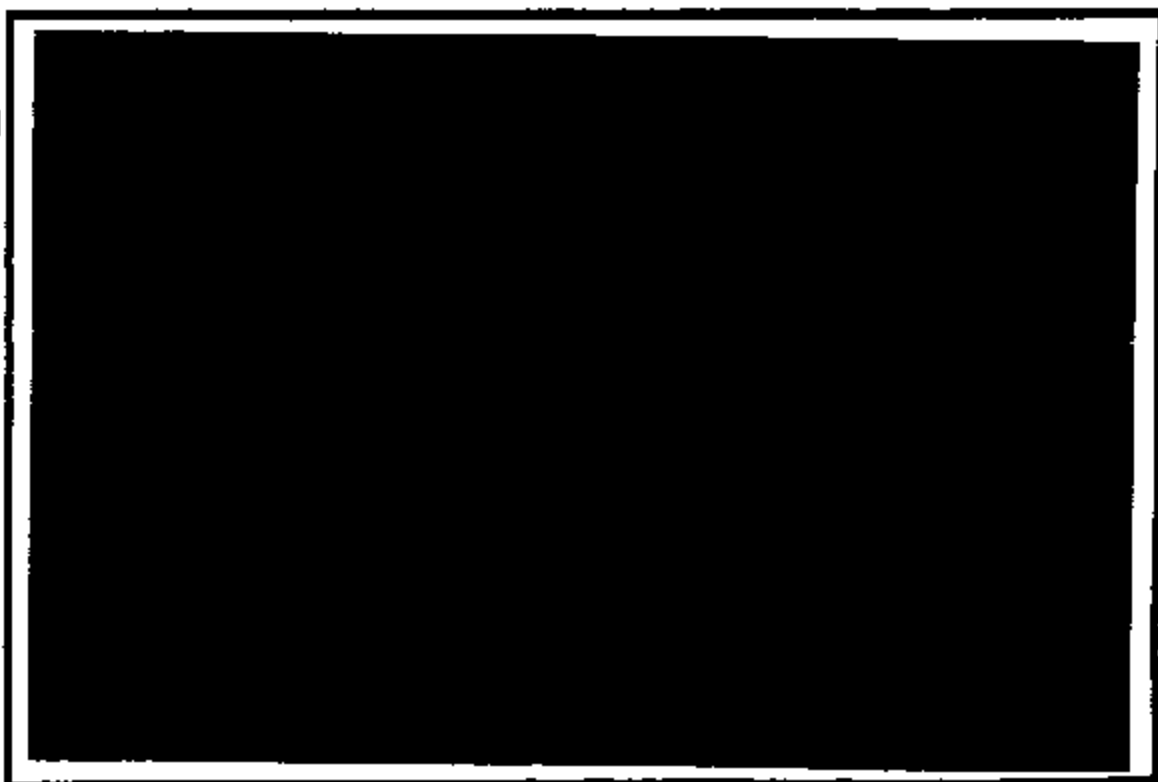
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View:

Photo No.

12



View:



THE  
PETER  
ENGINEERING  
GROUP, INC.

10. For 2004, Year 1, 2005

PROJECT

SUBJECT

PROJECT #

P99-206

Photo No.

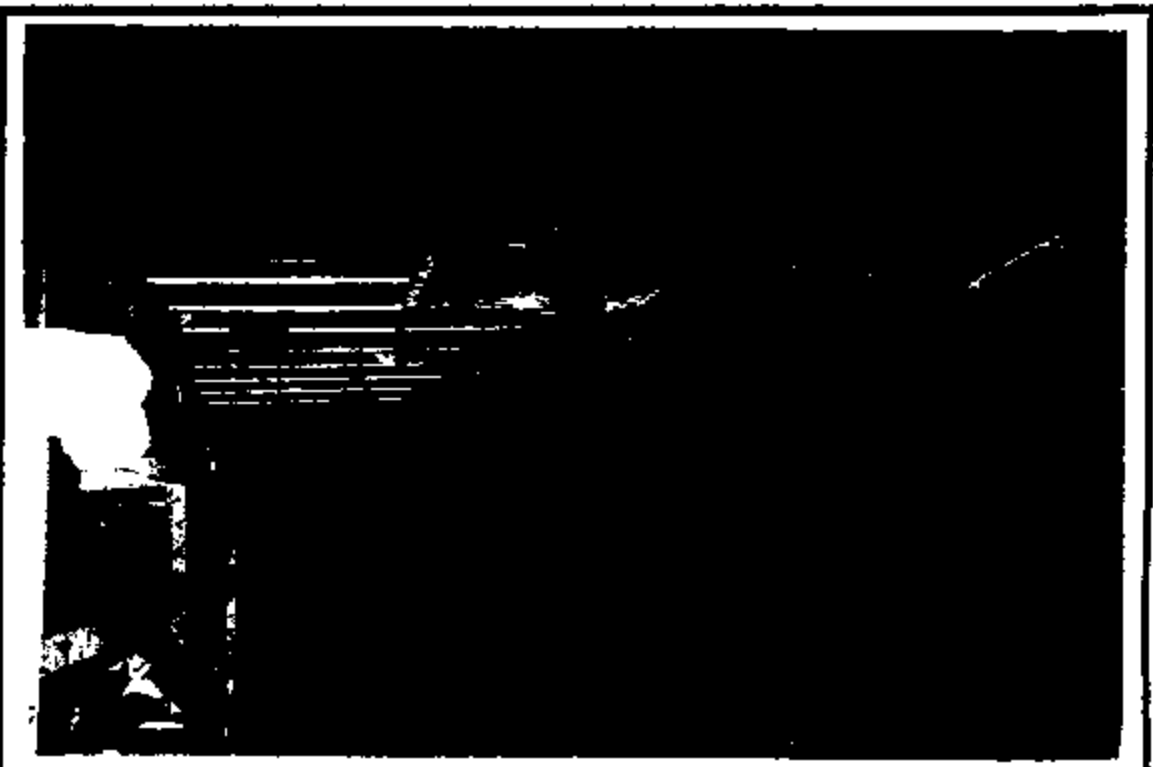
13



View:

Photo No.

14



View:

**PE**  
GROUP

THE  
PEPPER  
ENGINEERING  
GROUP, INC.

1111 E. 10th St., Suite 100, Tulsa, OK 74103

PROJECT

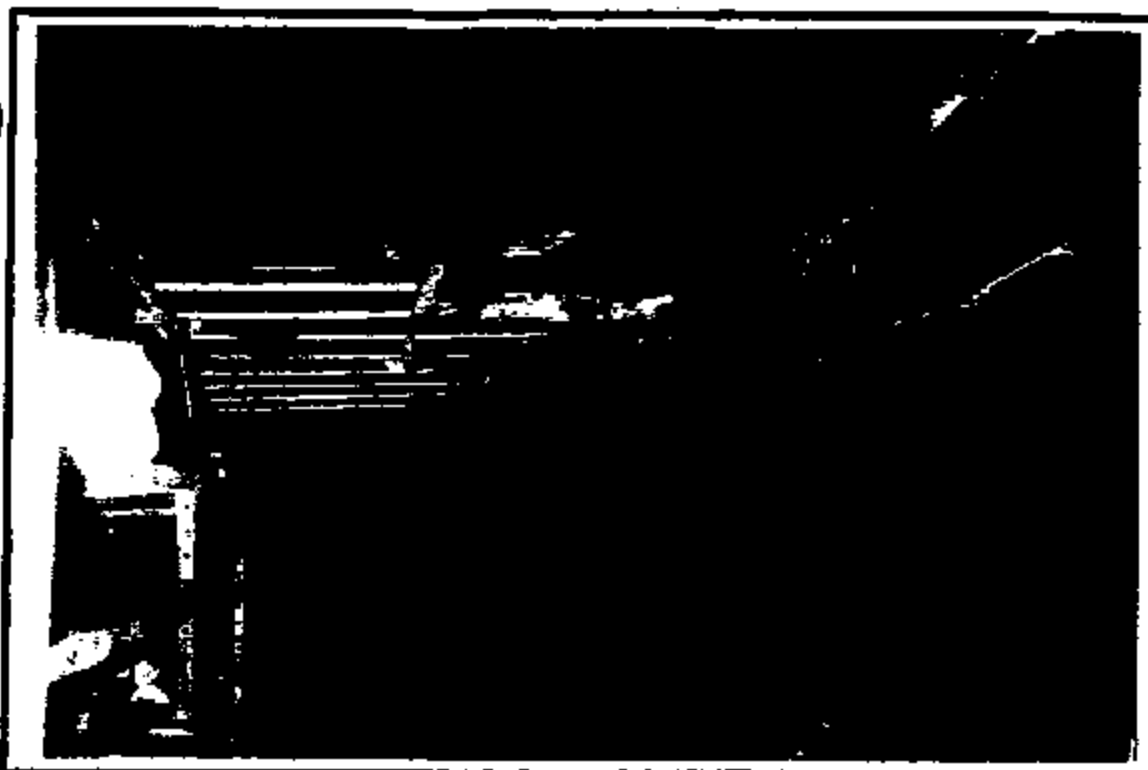
REVISION

PROJECT #

P99-206

Photo No.

15



View:

Photo No.

16



View:

EOSS-005-LC1-1852



THE  
PEPPER  
ENGINEERING  
GROUP, INC.

10 N. 20th Ave., Ft. Lauderdale, FL 33304

PROJECT



SUBJECT

PROJECT #

P99-206

Photo No.

17



View:

Photo No.

18



View:



THE  
PEPPER  
ENGINEERING  
GROUP, INC.

P.O. Box 2004, Winter, FL 32784

PROJECT



REVISION

PROPERTY #

P99-206

Photo No.

19



View:

Photo No.

20



View:

**PE**  
GROUP

THE  
PEPPER  
ENGINEERING  
GROUP, INC.

P.O. Box 2004, Weston, FL 33391

PROJECT

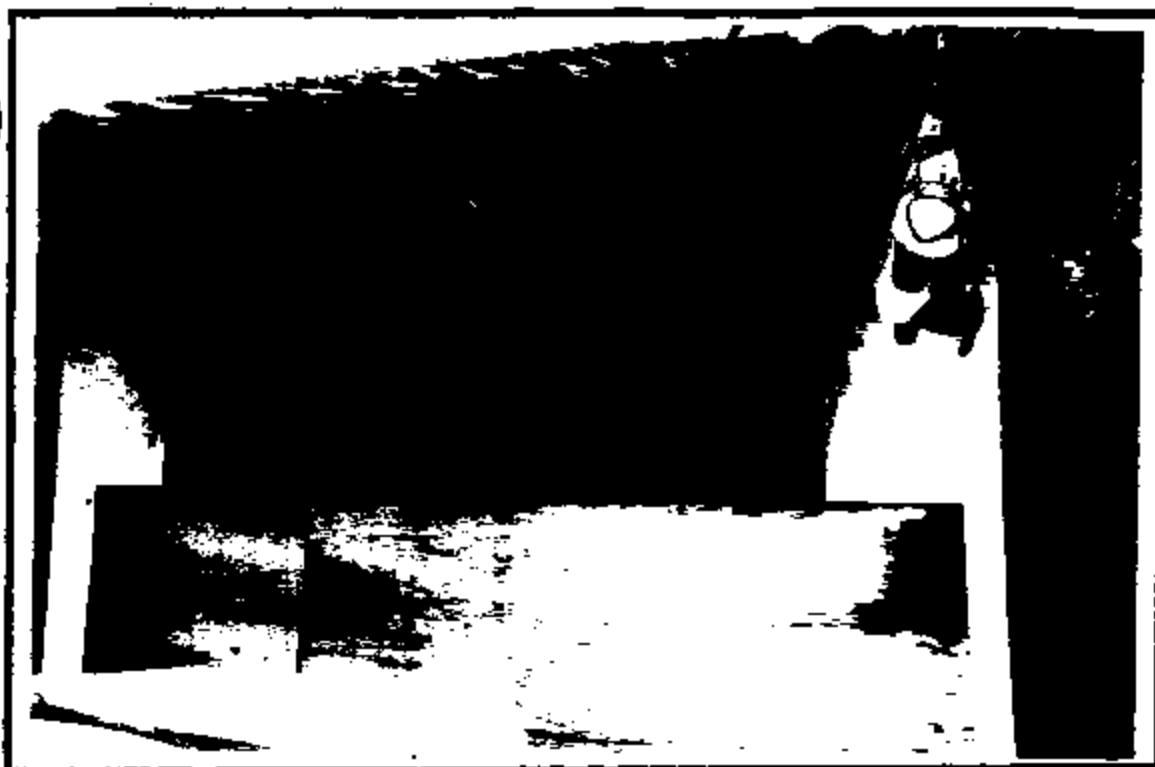
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**P99-206**

SUBJECT

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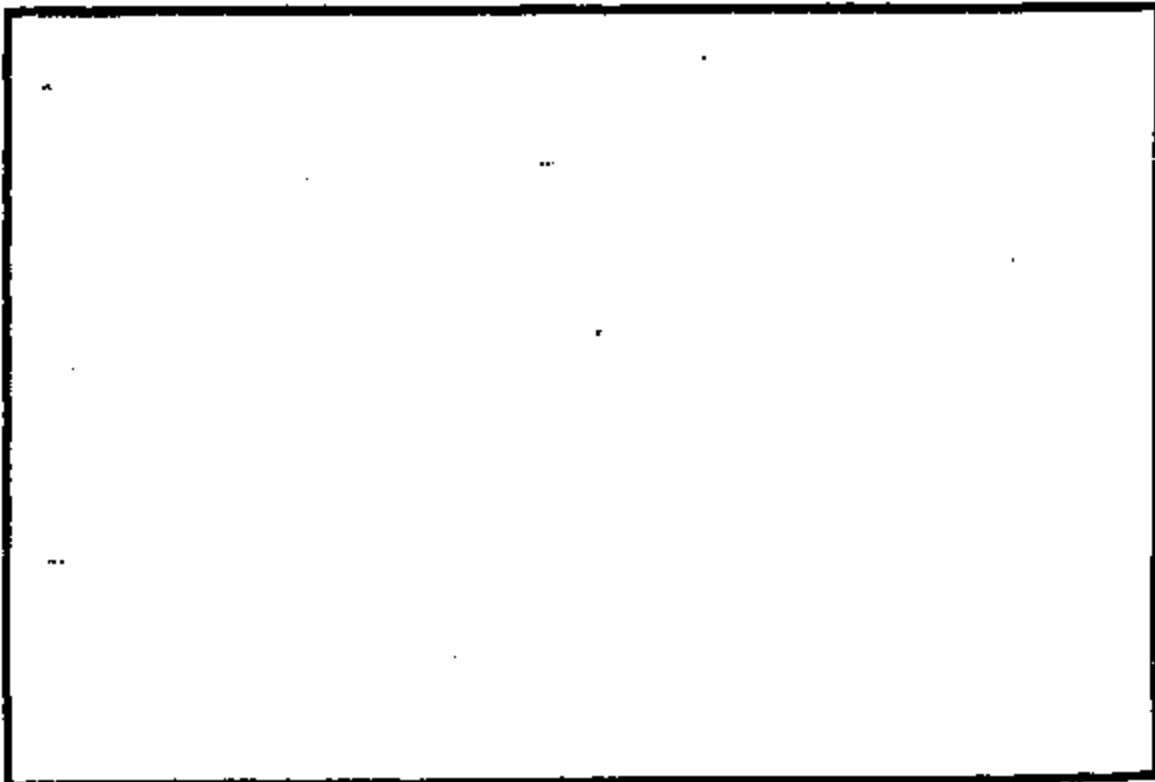
21



View:

Photo No.

22



View:



FIRE AND LOSS INVESTIGATION  
FORENSIC ENGINEERING

8730 Pinton Drive • Lake Worth, Florida 33467 • (561) 433-9232 • Fax (561) 433-9464

June 8, 1999

Ms. Ileana San Juan  
State Farm Insurance Company  
1710 N. University Drive  
Pembroke Pines, Florida 33024

RE: Insured : [REDACTED]  
Loss Address : [REDACTED]  
Fort Lauderdale, Florida  
Date of Loss : April 30, 1999  
Claim Number : [REDACTED]  
VCI File Number : 99-BR-26LR

Dear Ms. San Juan,

Vikra Consultants, Inc. (VCI) has completed its investigation into the above-captioned dwelling fire loss.

A fire scene examination was conducted on May 24, 1999, at which time the scene was completely photo-documented and examined for possible causes of the fire. On that same date, a 1996 Ford F150 pickup truck, which had been parked in the garage of the residence at the time of the fire, was examined and photo-documented at Sadisco salvage yard in West Palm Beach, Florida. Subsequent contact was made with Mr. William Harvey, the former husband of the named insured, and the driver of the subject vehicle. The report of the Broward County Fire Department was ordered and will be sent to you when it is received in this office. Research was conducted into the National Highway Traffic Safety Administration database regarding the subject vehicle. A copy of that data is enclosed as addenda to this report.

The loss structure is a one story, single family home, of CBS construction, with a barrel tiled roof, and a detached one car garage. The main axis of the house runs north and south; and the main axis of the garage runs east and west, with the garage roll up door facing west. A side door entering the garage is located off a common "breezeway" structure that connects the house to the garage via a walkway on the north side of the garage. The garage was provided with electrical service only. No evidence of failure of the electrical service (branch circuit wiring and outlets) to the garage was noted. Persons who live in the house are [REDACTED] (maiden name); [REDACTED] (estranged husband); [REDACTED], daughter of [REDACTED] and at least two other children in the home, presumably children of [REDACTED].

The loss vehicle is identified as a 1996 Ford pickup truck, model F150. The vehicle was examined at Sadisco of West Palm Beach, reference their control number WP177784. The vehicle was found in row 56 and was the vehicle numbered 49 in that row. VCI examined and photographed the vehicle at Sadisco. Because the vehicle is insured by



Allstate Insurance Company, no destructive disassembly/examination was conducted on the vehicle. Allstate Insurance Company has a tag on the rear tailgate of the vehicle with the Allstate claim number [REDACTED]. The vehicle is listed as champagne in color.

Physical examination reveals that the vehicle is a full sized pickup truck. There were "aftermarket" wheel rims in place. The tires exhibit similar tread wear on all four tires. The Vehicle Identification Number for this vehicle, which was found on the inside driver door of the vehicle, is 1FTEF15YXT[REDACTED] with a date of manufacture of October, 1995. This vehicle has two separate gas tanks. Both gas caps were found to be in place. The oil was checked and found to be at the "full" mark, with no evidence of water in it. VCI was unable to check the transmission fluid level because of fire damage to that area of the vehicle. VCI found no impact damage to the vehicle to indicate that it had been in any accident prior to the fire.

According to [REDACTED] the vehicle was parked as it usually is within the garage at the residence. [REDACTED] stated that on the day of the fire, at 9:45 PM, he drove his truck to pick up Chinese food at a take out restaurant nearby. He stated that he exited the vehicle at the restaurant. He stated that the alarm on the vehicle automatically sets when the doors are locked. He stated that he returned to the vehicle several minutes later after picking up the food. He entered the vehicle, deactivated the alarm system (placed in "valet" mode via a toggle switch hidden under the dash in the area of the steering column), and started the vehicle. [REDACTED] stated that when he started the vehicle, he noted that the ABS (anti lock brake system) light was on, and he was unable to get the car out of "park". He then put his foot on the brake and attempted to put the car in "reverse", but the transmission was locked and would not allow him to move the shift lever out of the "park" position. [REDACTED] called a friend [REDACTED], at M&M Automotive, and explained the problem with his truck. He then spoke with another friend [REDACTED] who was also at M&M Automotive. Neither of these men were able to be of help to [REDACTED] then spoke to a third man identified as [REDACTED] told [REDACTED] that the problem was most likely the fuse for the safety lockout feature.

[REDACTED] stated that at about that time, another friend of his, identified as "Jason", arrived. [REDACTED] stated that Jason is a firefighter. [REDACTED] stated that he and Jason found the fuse the [REDACTED] described as blue in color. He stated that a similar blue fuse was replaced into the location, and then the ABS light went out. [REDACTED] was then able to put the vehicle into "reverse", and then drive it. [REDACTED] then turned the vehicle off, reset the alarm, then restarted the vehicle to make sure it was going to work properly. He stated that he noted that the alarm would not reset. He stated that he then turned the vehicle off, and this time, the alarm did reset. He then drove the vehicle to the subject residence. He stated that he noted no odors of anything electrical burning or any odor of gasoline, or any odor of smoke at that time. [REDACTED] drove the vehicle into the garage and parked it there, closed the garage door, and went into the house.

[REDACTED] stated that about ten minutes after he arrived home and had parked the truck in the garage (about 10:30 to 10:45 PM), he went back into the garage and retrieved his glasses or wallet from the vehicle. He stated that he noted nothing unusual at that time. He stated that around that same time, his daughter [REDACTED], arrived home with a friend. [REDACTED] stated that his daughter and her friend noticed a slight odor of something burning as they parked outside the garage. He stated that they

did not pay any attention to this, thinking that the odor was probably from the burning wildfires in the Everglades at that time. [redacted] stated that about 11:00 to 11:15 PM, [redacted] walked her friend [redacted] out to [redacted]'s car in the driveway, as it was time for her to leave to go home. He stated that when the girls walked past the garage door, they noted thick black smoke coming from the door. He stated that the girls immediately ran back inside and alerted him to the smoke.

[redacted] stated that he exited the house at that time, opened the side door leading into the detached garage, and saw fire on the passenger side of the subject vehicle, both within the passenger compartment and in the engine compartment (passenger side). [redacted] stated that he was unable to do anything at that point except to call the Fire Department. He stated that he had gone around to the rollup door of the garage, pushed the code for the automatic garage door, and it went up about four feet, and then stopped. [redacted] had considered tying a rope onto his wife's car and trying to drag the burning truck out of the garage to get it away from the house, but the garage door wouldn't open far enough to do that. [redacted] stated that at about that time, various aerosol cans containing various household products that were normally stored in the garage began to explode, and the right front tire of the burning vehicle also exploded. [redacted] stated that a neighbor (an unidentified black man) had attempted to spray a garden hose onto the fire. However, when the vehicle fire exploded, all persons left the immediate fire scene.

Figure 1 is an exterior view of the house and garage. The arrow points to the rollup door to the garage. Smoke and soot staining along this wall and eave indicates that this garage door was open for a period of time during the fire.

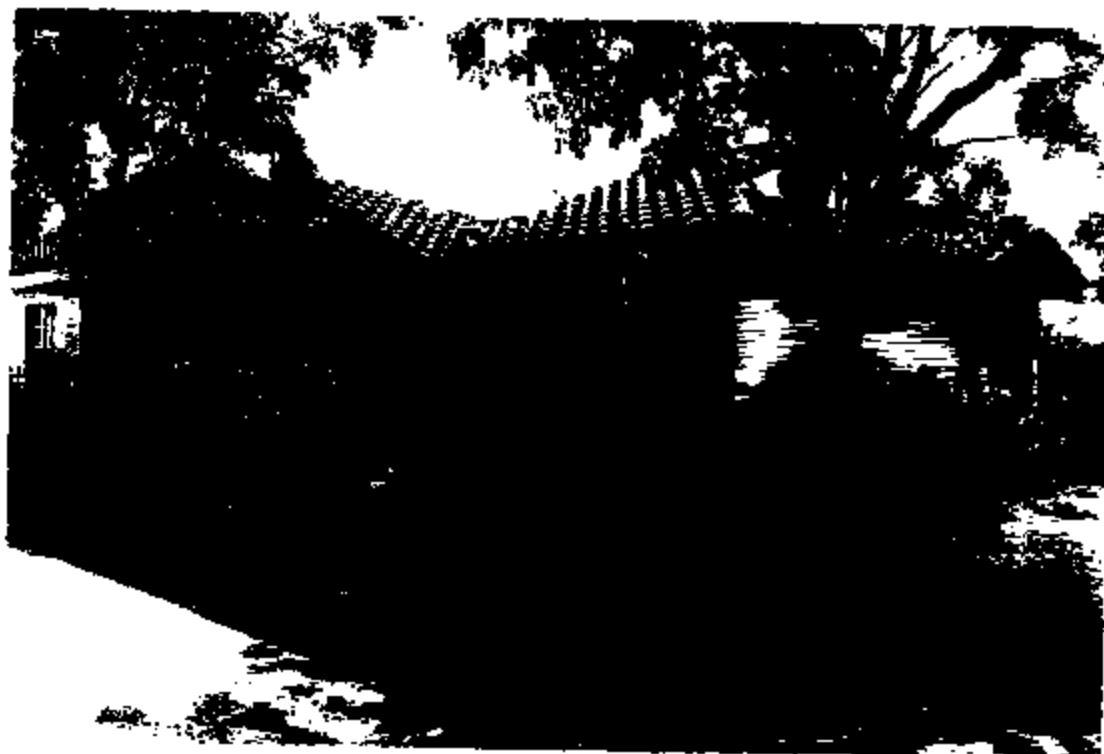


Figure 1  
EXTERIOR VIEW OF HOUSE AND GARAGE

Figure 2 is a view looking into the garage. Debris noted on the floor are items that were stored in the attic space of the garage and were pulled down during the fire. This is the area where the subject truck was parked. A prominent "V" burn pattern was seen on the south side of the garage (at arrow). The heat patterns are consistent with statement of the location where he first saw fire when he opened the side door to the garage.



Figure 2  
VIEW INSIDE GARAGE

Figure 3 is an exterior view of the side entry door to the garage. This is the door that Mr. [REDACTED] opened as he was investigating the source of the smoke his daughter and her friend had reported to him. Burn patterns on this door, as well as smoke staining above the door, indicate that this door was open during the course of this fire.



**Figure 3**  
**SIDE DOOR TO GARAGE**

Figure 4 is a view of the loss vehicle as it was found by VCI at the Sadisco salvage yard in West Palm Beach. The arrow points to the Allstate Insurance Company claim sticker on the tailgate.

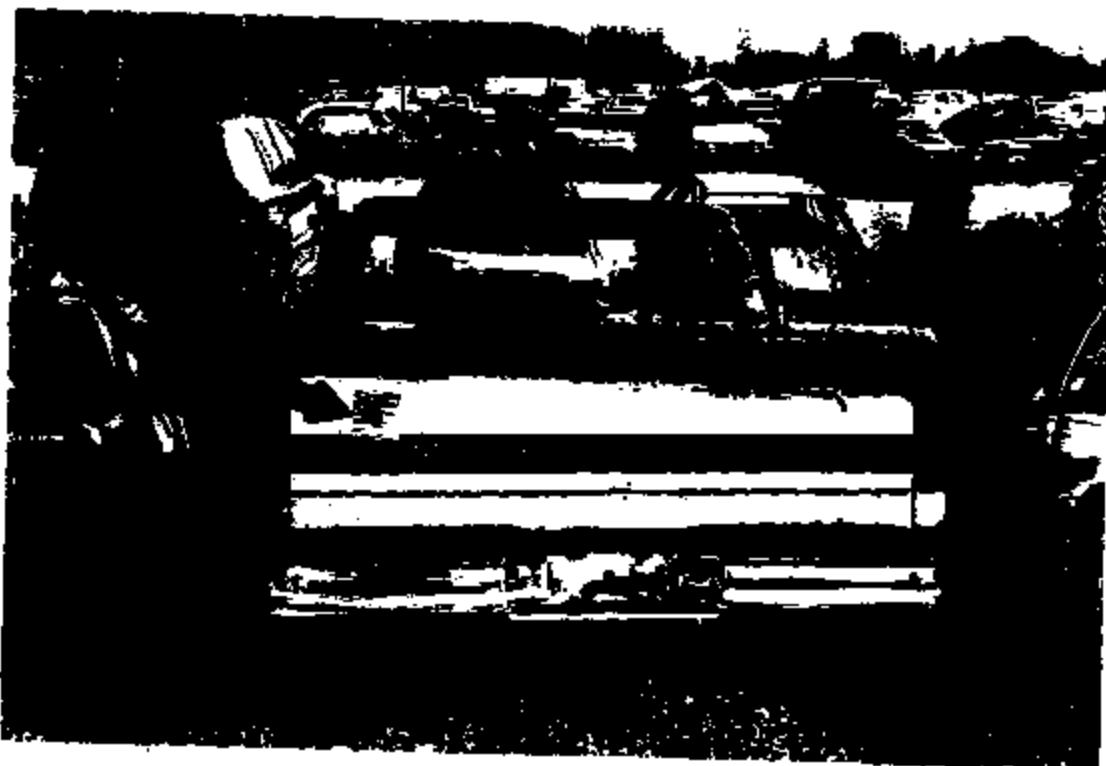


Figure 4  
REAR OF VEHICLE AT SADISCO SALVAGE YARD

Figure 5 is a view of the front of the loss vehicle. Burn patterns existing on the hood, as well as framework and body panels, reveal the highest amount of heat occurring on the passenger side of the vehicle, in the area of the engine compartment (at arrow).



Figure 5  
FRONT OF VEHICLE

Figure 6 is a view from the bed (rear) of the truck looking forward into the passenger compartment. Again, the greatest amount of fire damage is on the passenger side (at arrow), moving toward the driver side of the vehicle.



Figure 6  
PASSENGER COMPARTMENT, FROM BED OF VEHICLE



Figure 7 is a view of the engine compartment of the subject vehicle. Items located on the passenger side of the engine compartment include the battery and the alternator (shown at arrow resting atop the battery). The wiring harness in the area of the alternator connection was found to be supple, with no evidence of arcing or shorting noted. It should be noted that Ford Motor Company has had a history of problems with the connection leading to the alternator. This has been eliminated as a causal factor in this fire loss, however. VCI also examined the battery and found that the battery terminals had been burned away, and the associated battery cables were also badly fire damaged to the point where no failure determination could be made. Also, only a small amount of the engine compartment's original wiring harness remains in this area. It is unknown where the remainder of the wiring harness is. It does not appear to have been removed subsequent to the fire; but there is evidence of tearing of the wires that may have been the result of firefighters pulling debris apart within the engine compartment to ensure that the fire was extinguished.



**Figure 7**  
**ENGINE COMPARTMENT OF VEHICLE**

Fire Dept.

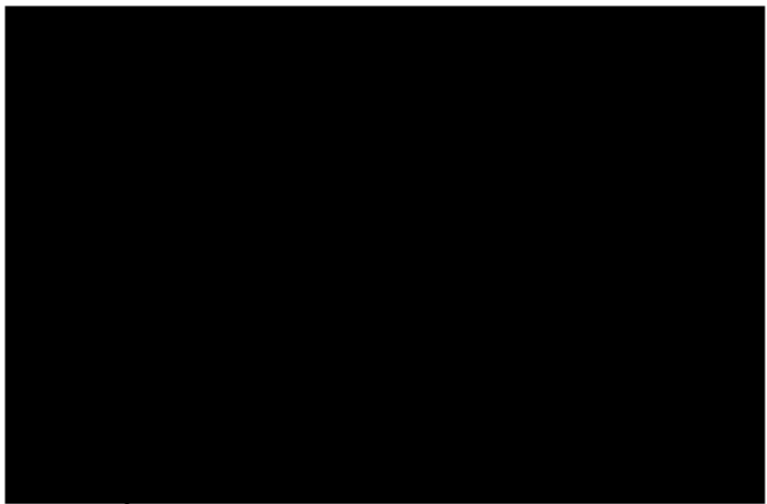


SUMMARY OF COMPANY OPERATIONS AND STORY OF FIRE/INCIDENT

INCIDENT # WS-1143	ADDRESS: [REDACTED]	PS# 21
DATE OF INCIDENT: 4/30/99	SHIFT: B	PAGE 1 OF 1
TYPE OF SITUATION FOUND: GARAGE FIRE		
<p>Write below a narrative account of the fire/incident, describing progress fire had made on arrival or situation found; how pumps, ladders, and other equipment were placed; on what floor or part of building each company worked and what they did; how the fire/incident was finally controlled, etc... If loss was large, give reasons. Make a sketch, where appropriate. Be sure to include disposition of incident (eg. scene turned over to Fire Investigator, determination of fire cause...)</p> <p>E-81-E-67 E-91 E-68 R-81 BC 35 BC 20 RESPONDED TO STRUCTURE FIRE AT [REDACTED] FIRE #1 E-67 ARRIVED REPORTED GAMES ON FIRE. E-67 SET UP COMMAND. E-67 LATER SUPPLY LINE TO A HYDRANT IN FRONT OF THE STRUCTURE. E-81 ARRIVED E-67 SUPPLIED E-81. E-67 + 81 USED AN 1 3/4" HAND LINE (CAME FROM EACH UNIT) BC 35 ARRIVED TOOK COMMAND. FIRE EXTINGUISHED. BC 20 ARRIVED. PREVENTION 520 FPM 500 + 1733 RESPONDED. ONCE INVESTIGATION ARRIVED SCENE TURNED OVER TO EMB. NO INJURIES</p>		
BSO CASE#	FIRE INVESTIGATOR FPM 500 + 1733	
REFERRED TO FOR FURTHER INVESTIGATION:		
DATE: 5/1/99	OFFICER: LT TANG	REVIEWED BY:

ESDNR 16/90

TOTAL P.02



**LISKA, EXNICIOS & NUNGESSER**

ATTORNEYS AT LAW

C. B. D. Office  
Pan American Life Center Suite 2655  
601 Poydras Street  
New Orleans, Louisiana 70130  
Phone:  
(504) 522-3473  
(504) 522-3493  
FAX: (504) 522-2308

N. O. East Office  
9701 Lakes Forest Blvd.  
Suite 101  
New Orleans, LA 70127  
Phone:  
(504) 245-1617  
(504) 245-1618  
FAX: (504) 245-1616

PLEASE REPLY TO: C.B.D. OFFICE

VAL PATRICK EXNICIOS

March 24, 2003

Shawn Norton  
Claim Analyst  
Ford Motor Company  
Parklane Towers West  
Suite 303  
3 Parklane Blvd.  
Deerborn, Michigan 48126

RE: Ford Truck Fire of July 19, 2002  
in Kenner, Louisiana

Dear Ms. Norton:

Please note that I have been retained to represent the interests of [REDACTED] and of their son [REDACTED] relative to their claims arising out of the above referenced fire. Mr. Gus Bazin, claims adjuster for [REDACTED] Insurance carrier has advised that you have been asked to handle the claims arising out of this matter.

Please advise as to what documentation you would like to receive regarding my clients' claims. Thank you.

With best personal and professional regards, I remain

Very truly yours,

  
VAL P. EXNICIOS

VPE/mb

cc: [REDACTED]

ER05-005-LC1-1968

LISKA, EXNICIOS & NUNGESSER  
ATTORNEYS AT LAW

C. B. D. Office  
Pan American Life Center Suite 2655  
601 Poydras Street  
New Orleans, Louisiana 70130  
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(504) 322-3475  
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N. O. East Office  
9701 Lake Forest Blvd.  
Suite 101  
New Orleans, LA 70127  
Phone:  
(504) 243-1612  
(504) 243-1618  
FAX: (504) 243-1816

PLEASE REPLY TO: C.B.D. OFFICE

VAL PATRICK BARRON

April 2, 2003

Shawn Norton  
Claims Analyst  
Ford Motor Company  
Parklane Towers West  
Suite 300  
Three Parklane Blvd.  
Dearborn, Michigan 48126-2568

RE: Date of Loss : July 19, 2002  
My Clients : [REDACTED]  
Additional Claimants: [REDACTED] and Lafayette Insurance Co.  
Lafayette Ins. Co. Claim No. [REDACTED]

Dear Mr. Norton:

In response to your queries of March 31, 2003, please be advised as follows:

1. my clients occupied the premises that was destroyed in the fire;
2. my clients were sleeping in their apartment above the area where [REDACTED] Ford vehicle was parked, smelled smoke and immediately fled the premises;
3. the police and/or fire reports have previously been forwarded to you by A. T. "Gus" Bazin, Adjuster for Lafayette Insurance Co.

4a. [REDACTED]  
date of birth: June 18, 1948  
address: [REDACTED]  
Kenner, LA [REDACTED]

Status: [REDACTED]

SSN: [REDACTED]

Occupation: business owner

4b. [REDACTED]

date of birth: [REDACTED]

address: [REDACTED]

Kenner, LA [REDACTED]

Status: [REDACTED]

SSN: [REDACTED]

Occupation: Homemaker

5. already in your possession;

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Shawn Norton  
Ford Motor Company  
April 1, 2003  
Page No. 2

- 6. unknown;
- 7. already in your possession;
- 11. None at this time except experts retained by Lafayette Insurance Co. that are already in your possession;
- 14. Currently being compiled and will be forwarded;
- 15. unknown;
- 16. unknown

Thank you.

With best personal and professional regards, I remain

Very truly yours,



VAL P. EXNICISS

VPE/rb  
cc:

