

Uhlinger and Keis

Attorneys at Law

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Cleveland, Ohio 44113-2079

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(216) 241-4100

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cwiseman@uhlingkeis.com
September 18, 2000

* also advised by letter

Ford Motor Company
c/o Statutory Agent: C.T. Corporation Systems
1300 E. 9th Street
Cleveland, Ohio 44114

RE: [REDACTED] vs. Ford Motor Company

Date of Loss: May 21, 2000

Location of Loss: The residence of [REDACTED] in Burton, Ohio

Our File No.: 28659

Dear Sir/Madam:

Please be advised that this office represents the subrogated interest of [REDACTED] with regard to the above-referenced loss. [REDACTED] vehicle caught on fire as the result of an electrical component failure in his 1996 Ford F-150 pick-up truck. The vehicle is currently being held at a salvage yard. My client plans to further inspect the electrical components in the area of the vehicle engine compartment to determine the exact point of fire origin if possible. This type of testing may of a nature which would cause the product to be altered or changed, and we would invite a representative of Ford be present at said inspection.

Please contact our office immediately upon receipt of this letter if you are interested in making inspection arrangements. If we do not hear from you within 21 days of the date of this letter, we will presume that you are not interested and will proceed with any testing necessary.

Sincerely,

Cassi M. Wiseman

Cassi M. Wiseman
Paralegal

cc: Motorists Mutual Insurance Co.
Attn: Dorothy Spencer
Claim No.: 3 498961 CL
Insured: Thomas Lockhart

ER25-003-LC1-2185





EP85-885-LC1-2187

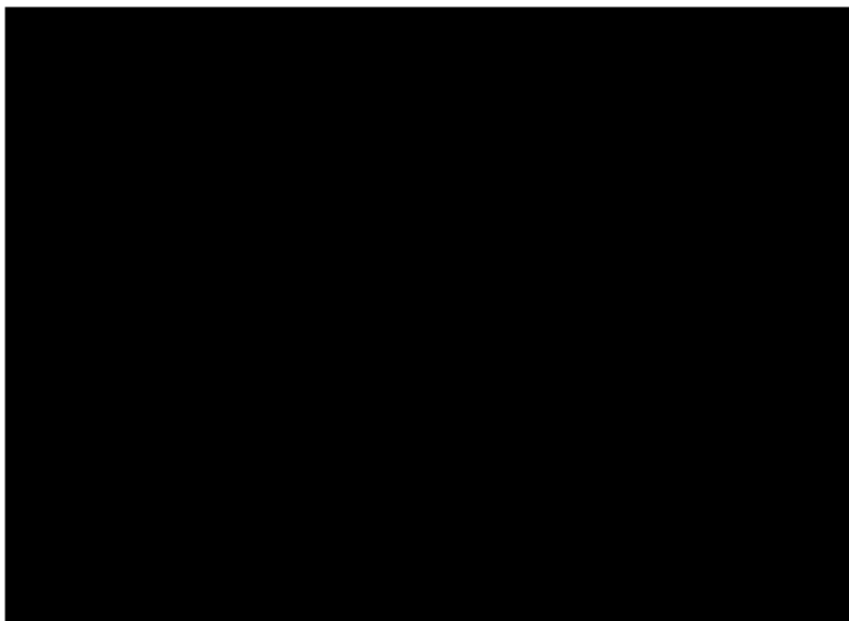


ENDS-005-LC1-2188



ER05-005-LC1-2169





BEGINNING OF CONTACT

11/28/2001

MASTER OWNER RELATIONS SYSTEM III

09.54.26

INQUIRY ISSUE CASE NO: 0430823311
 REGION: 47 CINCINNATI ZONE: D1 OPENED: 11/27/2001
 VIN: 1FHEU1867XL ENGINE: 6 VEH TYPE: T CLOSED: 11/27/2001

LAST NAME: [REDACTED] STATUS: CLOSED
 TITLE: MR FIRST NAME: [REDACTED] MI: [REDACTED]
 ADDRESS: [REDACTED]
 CITY: [REDACTED] STATE: KY ZIP: [REDACTED]
 HOME PHONE: [REDACTED]
 MODEL YEAR: 1999 MODEL: EXPEDITION 4X4 4-DOOR
 MILEAGE: 38000
 DEALER NAME: HUDSON FORD, INC. SALES CODE: F47069 P & A: 05608
 REASON CODE: 0703 LEGAL - ALLEGED SERIOUS INJURY
 SYMPTOMS: 704104 FIRE/SMOKE VISIBLE PLANS COLL. RELATED

ORIGIN: CAC138 - US CONCERN CASE BASE COMMUNICATION: PHONE
 ACTION: 717 - ADVISE CUST INFORMATION IS FORWARDED TO OUR PRODUCT CLAIMS GROUP
 DOCUMENT: ANALYST: SHAMERJE GAUMITA SHAMERJE
 ACTION DATA/COMMENTS:

2001/11/27

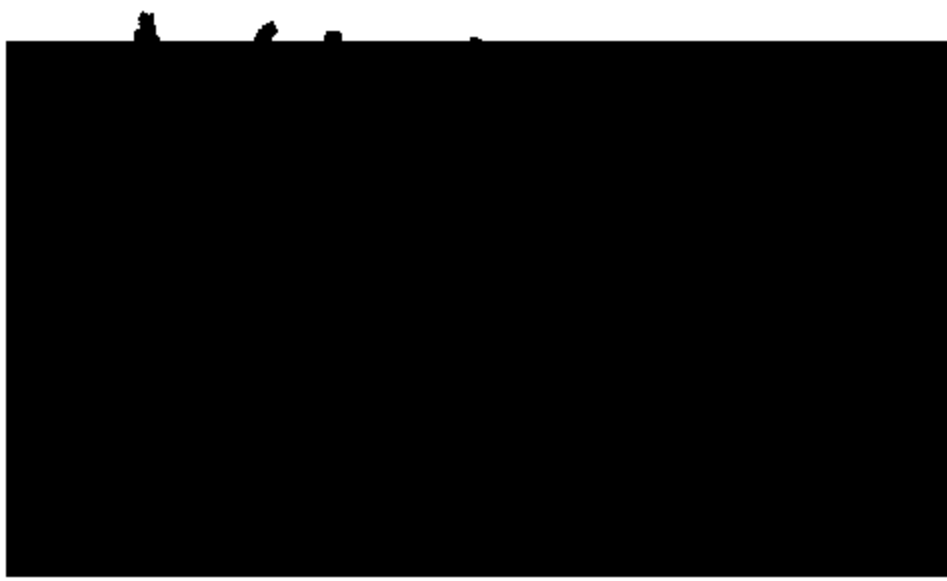
11.58.29

CUSTOMER SAYS: -INSURANCE COMPANY CALLING ON BEHALF OF CUS
 T, NAME [REDACTED] -FIRE CAUSED FOR WEIRING HARNESS -I
 T HAPPENED OCT 19 2001 -CUST THINKS THAT IT IS FORD PRODUCT
 DEFECT -CUST WAS IN PARKWAY WHEN THE FIRE OCCURED. -VENI
 IS WITH VINCENTS SALVAGE YARD AND THEY ARE GOING OUT OF BUSI
 NESS THEIR PH. NO IS [REDACTED] WANT TO MOVE THE VEH
 [REDACTED] IN SADRICO SALVAGE YARD. - FILED REPORT TO FIRE D
 EPT. REPORT NO. 17073 -REPORT SAYS UNDETERMINED CAUSE -RE
 PORT FILED ON PRINCETON KENTUCKY -CUST FILED A POLICE REPOR
 T ALSO THEY SAID SMOKE FINE UNDER THE HOOD -CUST CONTACTED
 WITH INSURANCE COMPANY -INSURANCE COMPANY SETTLED THE PAYM
 ENT - VEH IS NOT REPAIRABLE -INSURANCE CALIN NO [REDACTED]
 [REDACTED] -CALLER PH NO. [REDACTED] - PER CUSTOMER, DEAL
 ER SAYS: CAC ADVISED: - I WILL FORWARD THIS INFORMATION
 TO OUR PRODUCT CLAIMS GROUP. SOMEBODY WILL CONTACT YOU IN
 7- 10 BUSINESS DAYS. INFERENCE CASE ID: 5340



CONSUMER AFFAIRS

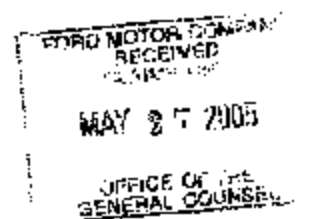
11/28/2001 NMFAXPRG



MAY 27 2005

Friday, May 06, 2005

FORD MOTOR COMPANY
PARKLANE TOWERS WEST #300
3 PARKLANE BLVD.
DEARBORN, MI 48126



Re: PRODUCT DEFECT CAUSED VEHICLE FIRE AND RESULTING DAMAGES.

VIN: 1FMRU17L8W[REDACTED]
Year: 1998
Make: FORD
Model: EXPEDITION
Our Insured: [REDACTED]
Address: [REDACTED] MATHIS, TX 78368
Phone No.: [REDACTED]
Our Claim No: [REDACTED]
Date of Loss: 4-18-05
Damages: \$ 9,986.99

NOTICE OF SUBROGATION CLAIM

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

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

Please acknowledge receipt of my subrogation demand and forward your payment of \$9,986.99 to my attention, payable to [REDACTED] as subrogee of [REDACTED] and mail to my attention at [REDACTED] Richmond Hts., OH [REDACTED]

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

Thank you for your anticipated cooperation.

[REDACTED]
William P. Kienzl
Subrogation Representative
(440) 603-7967

FMS-005-LC1-2102

ISSUE LIST					
Last Handling Date/ Issue Status	Name/ Reason Desc	Vin/ Case No.	Model Year and Vehicle Line	Issue Type	
5/15/2000 CLOSED	[REDACTED] OAC - OTHER CONCERN/INQUIRY	1FMRU17L8W [REDACTED] 1731171710	1998 EXPEDITION	02	
7/7/2000 CLOSED	[REDACTED] WARRANTY - MULTIPLE REPAIR	1FMRU17L8W [REDACTED] 1731171710	998 EXPEDITION	03	

E005-005-LC1-2103

6/3/2005

All Action Details for Issue

Print

VIN: 1FMPU17L8W [REDACTED] Year: 1998 Model: EXPEDITION Case: 1731171710
Name: [REDACTED] Owner Status: Original WSD: 1998-04-20
Symptom Desc: WIPER/WASHER BACKGLASS INOPERATIVE Primary Phone: [REDACTED]
Reason Desc: OAC - OTHER CONCERN/INQUIRY Secondary Phone: [REDACTED]
Issue Type: 02 INFORMATION Issue Status: CLOSED

Action: OPEN ISSUE FOR OWNER APPRECIATION CERTIFICATE TO DEALER
Dealer: 02549 SILSBEE FORD LINCOLN MERCURY, INC. Origin Desc: MARKETING ASSOCIATES
Odometer: 31854 MI Comm Type: MAIL
Analyst Name: PATRICIA TREMONTI Analyst: 7723PT
Action Date: 08/07/2000 Action Time: 13.49.00.732 Action Data: Yes

Comments: ALAN FASS CSM SOUTHWEST ATTN EP WILLIAMS

Data Element Name	Data Value
CERTIFICATE AMOUNT	2000

Action: ADD ADDITIONAL SYMPTOM CODE
Dealer: 02549 SILSBEE FORD LINCOLN MERCURY, INC. Origin Desc: MARKETING ASSOCIATES
Odometer: 31854 MI Comm Type: MAIL
Analyst Name: PATRICIA TREMONTI Analyst: 7723PT
Action Date: 08/07/2000 Action Time: 13.49.14.320 Action Data: Yes

Comments: NO COMMENTS AVAILABLE

Data Element Name	Data Value
SYMPTOM CODE	112133

Action: CLOSE ISSUE FOR OWNER APPRECIATION CERTIFICATE - REDEEMED
Dealer: 02549 SILSBEE FORD LINCOLN MERCURY, INC. Origin Desc: MARKETING ASSOCIATES
Odometer: 31854 MI Comm Type: MAIL
Analyst Name: VENESSA WAY Analyst: VWAY
Action Date: 08/15/2000 Action Time: 16.21.50.027 Action Data: Yes

Comments: NO COMMENTS AVAILABLE

Data Element Name	Data Value
REDEEMED DATE	07-28-2000
REPLACEMENT VIN	YEE3584800

E905-005-LC1-2194

6/3/2005

All Action Details for Issue

Print

VIN: 1FMRU17LW1 [REDACTED] Year: 1998 Model: EXPEDITION Case: 1731171710
Name: [REDACTED] Owner Status: Original WSD: 1998-04-20
Symptom Desc: LIGHTING SYSTEM INTERIOR LIGHTING Primary Phone: [REDACTED]
Reason Desc: WARRANTY - MULTIPLE REPAIR Secondary Phone: [REDACTED]
Issue Type: 03 CONCERN Issue Status: CLOSED
Initial Customer Contact:

Action: ADVISE CUST INFO WILL BE SENT TO DLR; CONTACT CRM
Dealer: 02549 SILSBEE FORD LINCOLN MERCURY, INC. Origin Desc: US CONCERN CASE BASE
Odometer: 30000 MI Comm Type: MAIL
Analyst Name: BRENDA JONES Analyst: BJONES
Action Date: 08/18/2000 Action Time: 20.16.29.868 Action Date: No

Comments CUSTOMER SAYS: VP SURVEY HAVING INTERMITTANT ELECTRICAL PROBLEMS SINCE PURCHASE-BLOWING FUSES AND POWER DOOR LOCKS NOT WORKING, INTERIOR LIGHTS AS WELL DLR UNABLE TO FIND THE SHORT IN 4 VISITS IT IS INCONVENIENT AND THE DLR HAS NO LOANER VEH PER CUSTOMER, DEALER SAYS: SILSBEE FORD CAC ADVISED: - VEHICLE UNDER BUMPER-TO-BUMPER WARRANTY - WILL FORWARD INFORMATION TO THE DEALERSHIP, WITH A COPY TO THE REGIONAL OFFICE ESPECIALLY BECAUSE THERE IS AN EXPIRED ONP 99B02 FOR MULTI SWITCH THAT COULD HAVE CAUSED THE ELECTRICAL PROBLEMS - WILL REQUEST CRM/SERVICE MANAGER CONTACT CUSTOMER WITHIN 2 BUSINESS DAYS ADVISED CUST TO CONTACT DLR FOR ASSISTANCE INFERENCE CASE ID: 4589

Action: NO REPAIR PROCEDURE AVAILABLE AT THIS TIME PER - "OTHER"
Dealer: 02549 SILSBEE FORD LINCOLN MERCURY, INC. Origin Desc: DEALER
Odometer: 30000 MI Comm Type: MAIL
Analyst Name: SILSBEE FORD LIN Analyst: F52088
Action Date: 07/07/2000 Action Time: 11.48.00.943 Action Date: No

Comments CUSTOMER VEHICLE IN DLR 8/27/00 FOR REPAIR-HOTLINE CONTACTED- DLR COULD NOT DUPLICATE CONCERN-CUSTOMER TOOK VEHICLE HAVE NOT HAD PROBLEM SINCE

END-005-LC1-2195

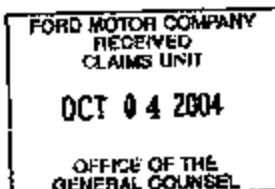
6/3/2005

AIG *World Investigative Resources*

Special Investigation Unit
318 Indian Trace Box 641
Weston, FL 33326-2996
(954) 384-5875
Fax (954) 389-9453
E-mail larry.cosoiff@aig.com

9/27/04

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



Re : Vehicle Engine Fire Vehicle : 1998 Ford Expedition
Vin: 1FMRU17L4WL [REDACTED]
Owner/Insured: [REDACTED]
Driver: Insured
Date of Loss: 8/23/04 @ 8 AM
Claim# [REDACTED]
NETS Case # 05-0299

To Whom It May Concern:

Please be advised, that I represent AIG insurance Company Personal Lines. The above vehicle was involved in a fire, which resulted from an alleged wire problem in the engine area. The incident occurred on 8/23/04, in a parking lot located on [REDACTED] Avenue, Miami, FL.

In order to determine the cause of the fire, including a determination as to any defect in the vehicle was in existence at the time of the incident, an inspection and testing of the vehicle will be conducted by North Eastern Technical Services, Inc., an authorized representative of the above. This inspection will take place at Co Part, located at 12850 NW 27th Avenue, Miami, FL.

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

To coordinate the inspection date and time, please contact North Eastern Technical Services Inc. at 508-675-0999. Should you have any questions pertaining to this matter, or wish to discuss the same in further detail, you may contact the undersigned at 954-384-5875. Failure to respond to this notification within 10 business days from the date of this letter will be construed as forfeiture of your right to be present at this examination.

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

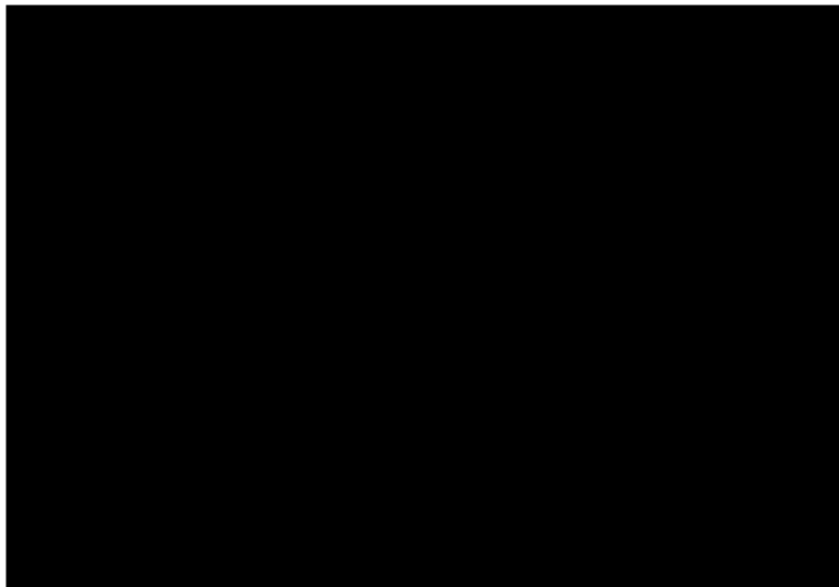
Sincerely,

LRS for
Larry Rosoff

AIGWIR

CC:

North Eastern Technical Services, Inc.
P.O. Box 5150
Fall River MA 02723





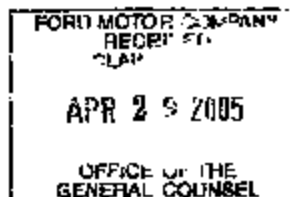
FARMERS

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

APR 29 2005

04/22/2005

Ford Motor Company
Consumer Affairs
Attn: Shawn Norton
P O Box 6248/Mail Code Md-3ne-B
Dearborn, MI 48126



Re: Our Insured: [REDACTED]
Loss Date: 02/10/2005
Claim Number: [REDACTED]
Total Amount Owed: \$6,815.63

Dear Ms. Norton,

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

You will find this correspondence and its enclosures contain substantive information and support adequate for your firm to make a decision concerning your liability. *The vehicle will be available for your inspection during the next 60 days. Afterwards, we will be required to attempt to sell the salvage.*

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

Your product did not meet the expectations of my insured, the consumer. Your product failed and caused the loss resulting in damages of 6,815.63. Attached are documents substantiating payment.

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

ER05-005-LC1-2198

Sincerely,
Mid-Century Insurance Company of Texas

Scott Sheffield

Scott Sheffield
Auto Subrogation Representative
512-238-5739

ENCLOSURES



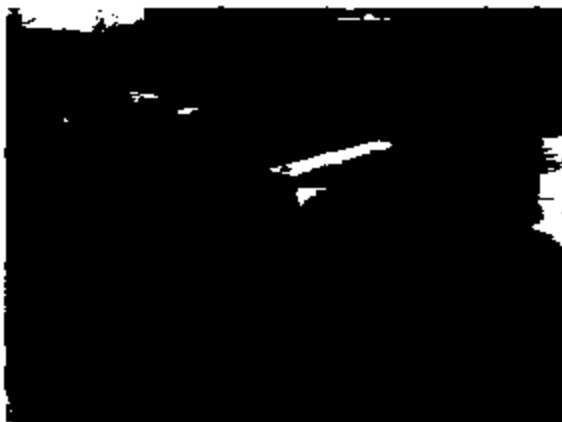
front



rt front



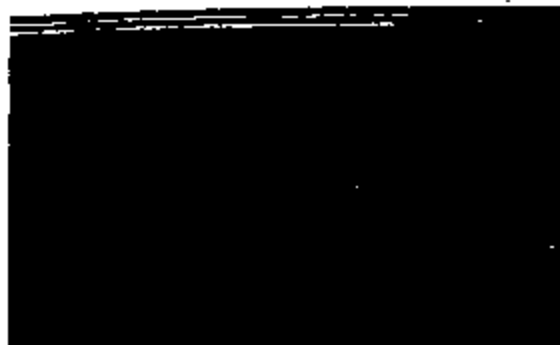
rt side



rt rear

2/15/2005

EP05-B05-LC1-2200



ltc plate



ltc rear



ltc side



ltc front

15/2005



engine completely burned



hood burned



headlamps burned



dash burned and windshield busted

[REDACTED]

2/15/2005

EA85-085-LC1-2282



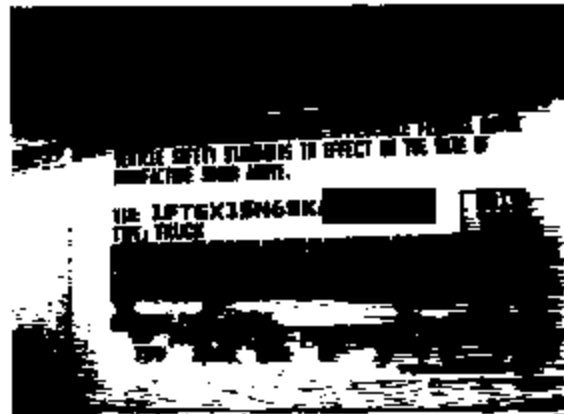
lt fender burned



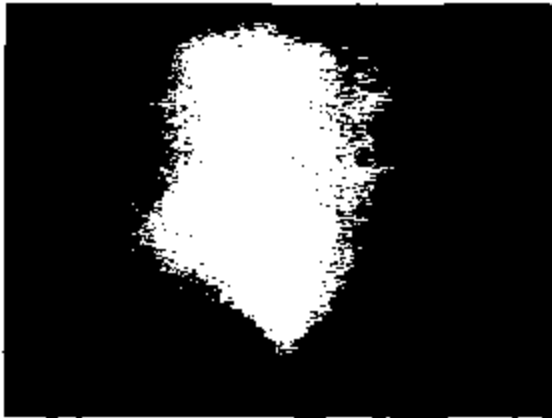
cowl burned



lt door glass busted



VIN



mileage - 141140



power windows, locks and mirrors



am/fm radio



trunk box



grill burned



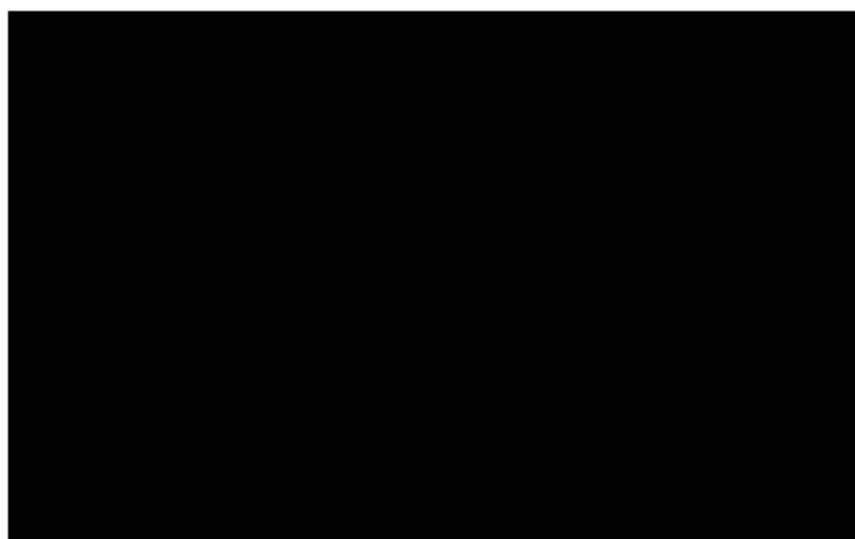
rt fender burned



[REDACTED]

2/15/2005

EW05-005-LC1-2205

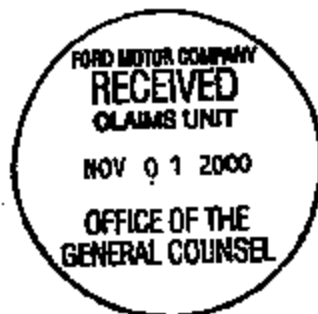


PROGRESSIVE

P.O. Box 43298
Richmond Heights, OH 44143
progressive.com

October 20, 2000

Ford Motor Company
300 Renaissance Center
PO Box 43360
Detroit, MI 48243



Re: VIN: 1FTDX1762VN [REDACTED]
Year: 1997
Make: Ford
Model: F150
Our Insured: [REDACTED]
Our Claim No: [REDACTED]
Date of Loss: 304000
Damages: \$18,448.73

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

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

Please acknowledge receipt of my subrogation demand and forward your payment of \$18,448.73 to my attention, payable to [REDACTED] as subrogee of [REDACTED] and mail to my attention at [REDACTED] Richmond Hts., OH [REDACTED]

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

Thank you for your anticipated cooperation.

PROGRESSIVE INSURANCE COMPANY

William P. Kierulff
Subrogation Representative
(440) 446-6742

Enclosures

90:60 26 100 07 32 19:06
- \$18,448.73
- F150
- VIN
- EXP. Apt.
CONSUMER AFFAIRS SECTION

NA NorthAmerican

Technical & Forensic Services, Inc.

P.O. Box 1845, Frederick MD 21702
800.481.1002

EXAMINATION REPORT

PROGRESSIVE INSURANCE

Eric Feick

Claim Number

[REDACTED]

NorthAmerican File Number

4327-02

Insured

[REDACTED]

Date of Examination

03-24-00

Date of Report

04-17-00

Purpose of Examination

Vehicle Fire Examination & Analysis
Photographic Report

NA NorthAmerican_{sm}

Technical & Forensic Services, Inc.

To: Eric Feick
Progressive

Re: [REDACTED]

Examination Report

Vehicle Examined:

This vehicle is a 1997 Ford F150, 3 door, tan/burned. Insured reported the vehicle had sustained fire damage possibly due to mechanical reasons. VIN is [REDACTED]

Location:

The vehicle was located at the insured's residence, Santa Ana, CA.

Purpose of Examination:

To conduct a mechanical examination of the vehicle and components to determine the cause of the fire that severely and extensively damaged this vehicle.

Preliminary:

On 03-24-00, the undersigned proceeded to Santa Ana, CA, to examine the above identified vehicle. I was directed to the vehicle by facility employees. Positive identification was confirmed by the vehicle description and VIN.

Note: Industry standard is the driver side is the left side from any angle.

Exterior Examination:

Procedure: *The exterior of the vehicle is examined to determine the extent of total damage and identify the area(s) of the most intense or severe damage. This examination includes the vehicle underside.*

Results: The exterior of the vehicle sustained severe fire damage to all areas forward of, and including, the 'A' pillars. There was moderate fire damage to the left door leading edge. From the 'A' pillars rearward there was no damage.

The vehicle underside was examined. The examination results revealed some left side wiring harnesses were fire-damaged near the frame rail. This was a result of the fire and not the cause. There was insufficient damage to the vehicle underside to indicate the fire originated in this area.

Burn patterns on the exterior indicated the fire was most intense and concentrated in the engine compartment area. There was no apparent impact/collision damage. All four wheels and tires were present on the vehicle at the time of the fire.

Interior Examination:

Procedure: *The interior electrical wiring and electrical components are examined as a possible cause of the fire. Debris may be removed for further analysis. The degree of interior damage is assessed.*

Results: The interior sustained moderate to severe fire and thermal damage to the dash, headliner, front seats and door panels. The rear area of the interior sustained moderate damage. There was diminishing damage from the top dashboard toward the rear of the interior.

Interior burn patterns and components damage indicated the fire was most intense and concentrated at the top (upper) dash area along the firewall. This would indicate the fire progressed from the engine compartment into the interior.

The interior electrical wiring and components were examined as a possible cause to this fire. No evidence of pre-fire electrical shorting was found. There are no fuel/fluid lines in the interior. The remains of the audio system were present in the vehicle. The odometer mileage was 67,325.

Engine Compartment Examination:

Procedure: All of the mechanical, electrical, fuel and fluid components in the engine compartment and on the engine block are examined for evidence of electrical shorting, fuel/fluid leaks, physical defects or pre-fire damage.

Results: The engine compartment sustained severe fire and thermal damage to all components. Engine compartment component damage and burn patterns indicate the fire was concentrated and most intense along the left front inner fender area where the power distribution block is located, with diminishing damage outward from that area.

The engine compartment electrical wiring and components were examined for evidence of pre-fire shorting. Evidence of pre-fire electrical shorting was found at the power distribution box wiring and wiring to the power distribution block with brittle, discolored wiring and fusing of the wires. This damage is consistent with heavy electrical shorting.

The engine compartment fuel lines and components were examined for any indication of fuel leaks. No evidence of a fuel leak was found at the fuel lines or fuel system components.

Fluid/oil lines, reservoirs, components/pumps and the engine block (brake, powersteering, transmission, motor oil) in the compartment were inspected for any indication of pre-fire leaks that would be a cause to this fire. No evidence of fluid/oil leaks was found.

Origin of the Fire:

This fire originated in the vehicle engine compartment at the power distribution block.

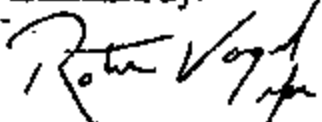
Cause of the Fire:

It is the opinion of this examiner, based upon the above information, that this fire was caused by heavy electrical shorting within the power distribution block. There was evidence of wire fusing. The overheated wiring/components caused ignition of the wire insulation and adjacent combustible materials. The fire spread to, and consumed, the brake master cylinder, power steering fluid reservoir and eventually both cylinder banks and pressurized fuel rails. These fluids contributed to the severity of the fire and thermal damage.

Note: The evidence field and burned debris had been disturbed prior to this examination by at least, but not limited to, the insured.

If I may be of further assistance please advise.

Examined By:



Robert Vogel

Reviewed By:



Robert Mangine

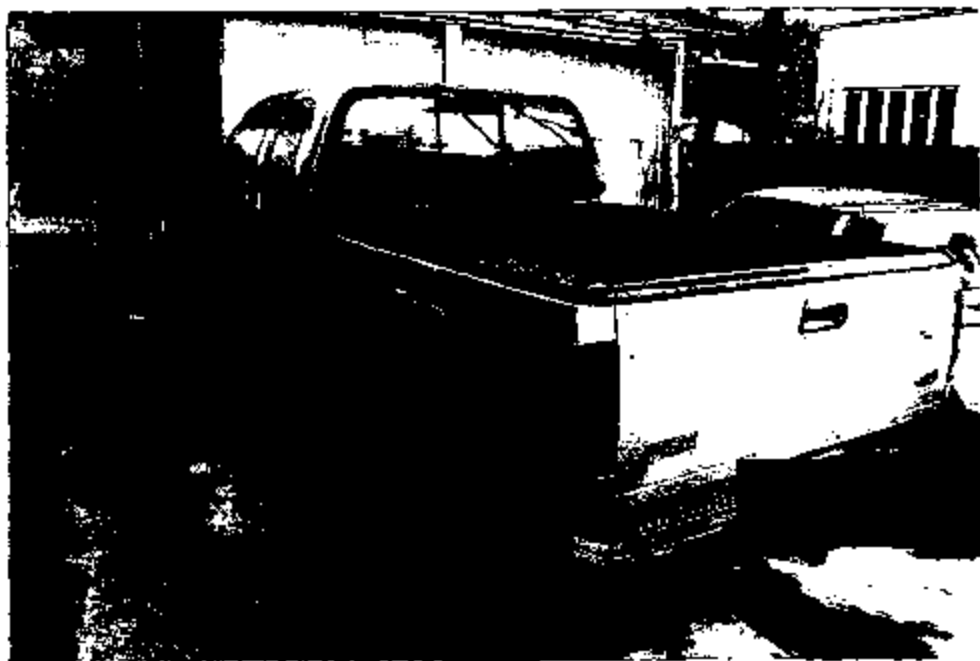
Attached: Photographic Report



1 - Front left of vehicle



2 - Front right of vehicle



3 - Rear right of vehicle



4 - Rear right of vehicle

2005-005-1C1-2215



5 - Truck bed contents

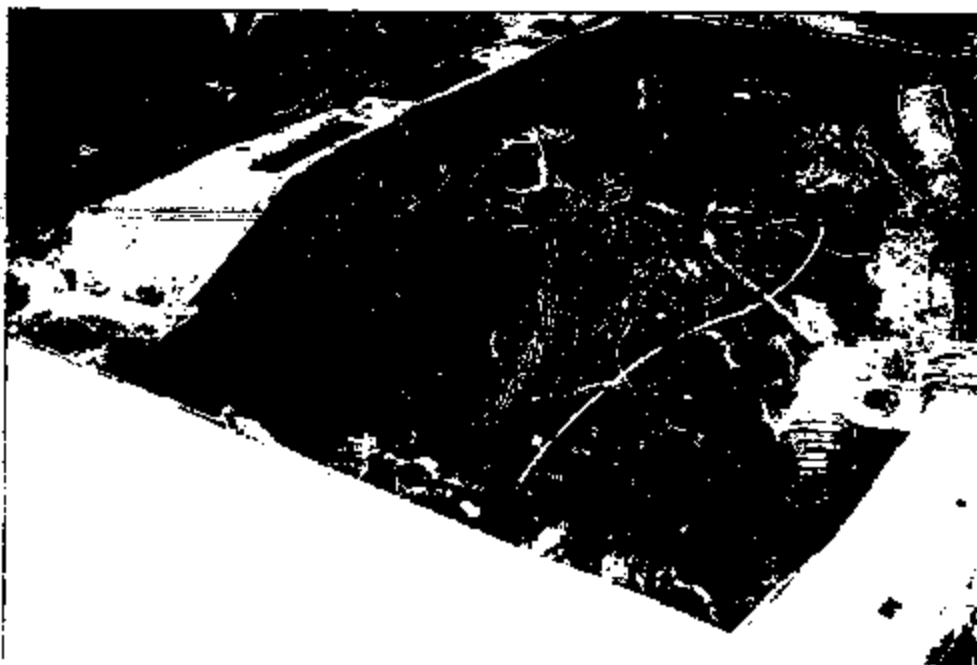


6 - Engine compartment



7 - Engine compartment from left

5085-805-LC1-2216



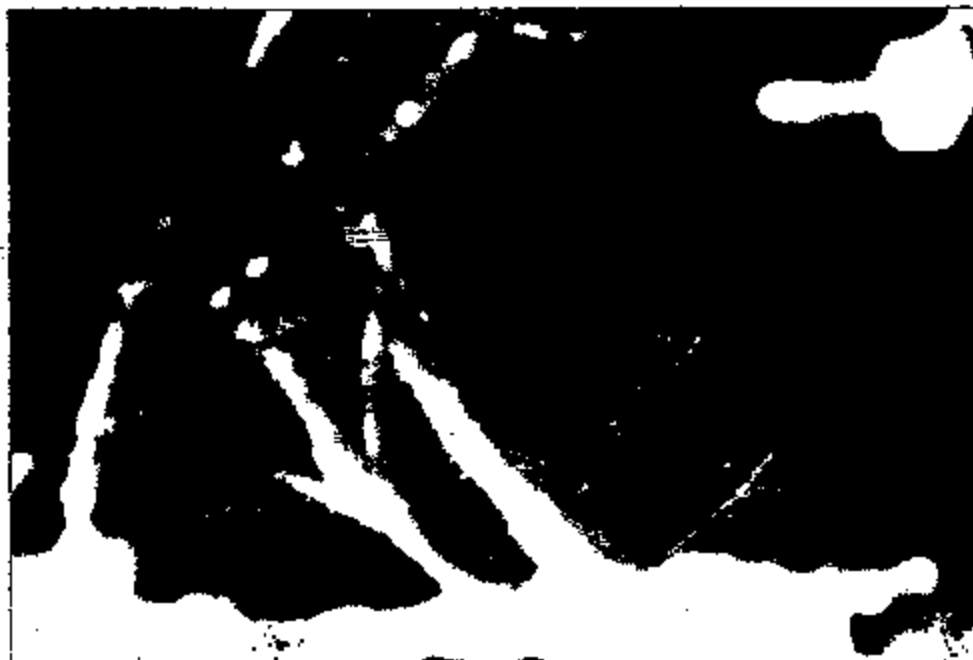
8 - Engine compartment from right



9 - Bulkhead connector at the left corner of the firewall



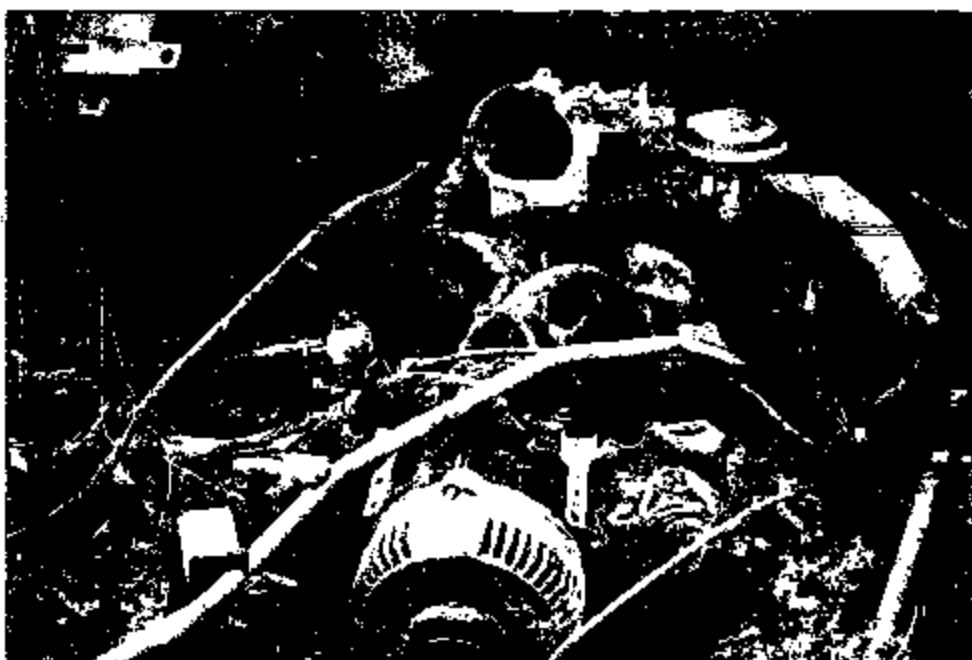
10 - Mounting location for the power distribution block



11 - Wiring to the power distribution block



12 - Top of brake ABS booster and left cylinder
ignition module/coil



13 - Damage to air plenum. Note condition of alternator



14 - Left front interior



15 - Right front interior



16 - Rear interior

6985-882-1C1-2227



17 - Lower left dash. Note brake pedal.



18 - Top of dash from left



21 - Odometer



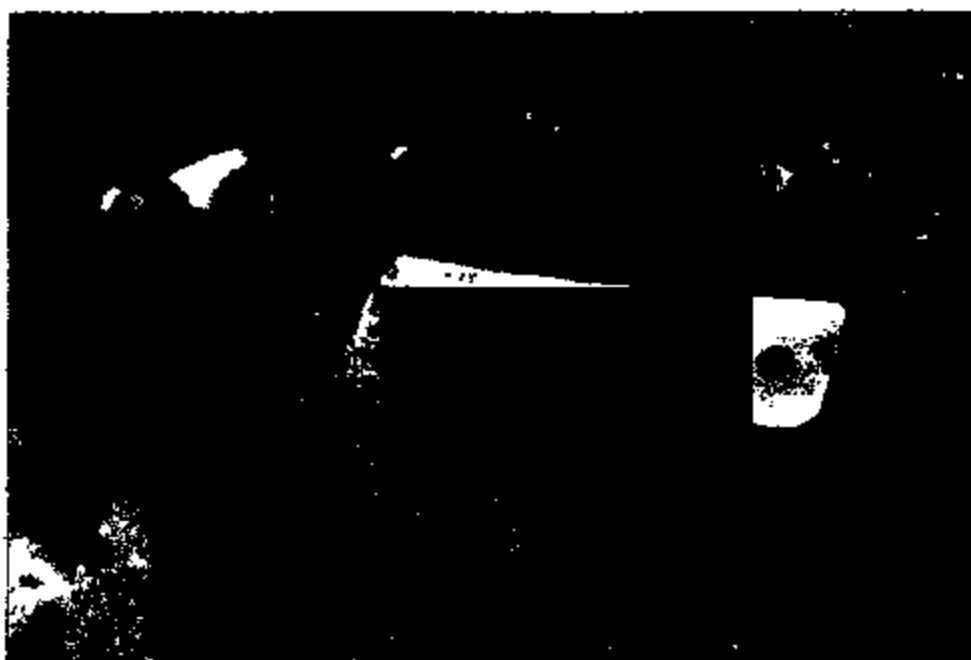
20 - Underdash firewall/bulkhead. Note brake pedal.



19 - Furthest left corner of floor area at firewall



21 - Odometer



22 - VIN

CDD
IN THE STATE COURT OF ~~SHERIDAN~~ COUNTY
STATE OF GEORGIA

[REDACTED]
PLAINTIFF

2002A

V.

CIVIL ACTION NO:

FORD MOTOR CORPORATION,

DEFENDANT.

COMPLAINT FOR DAMAGES

2002 JUN 21 AM 11:05
[Signature]
STATE COURT CLERK

Comes now the Plaintiffs and shows this Honorable Court the following:

1.

Defendant Ford Motor Corporation is subject to the jurisdiction and venue of this court and can be served through their registered agent Corporation Process Company at 180 Cherokee Street Marietta, GA 30060 pursuant to O.C.G.A. §19-11-4(d)(1).

2.

On or before May 30, 2000 Defendant manufactured a defective 1999 Ford Expedition, which contained a faulty electrical wiring in the engine compartment. The defendant's defective product proximately caused property damage by way of fire in the amount of \$27062.97 to the Plaintiff's insured's property.

3.

The Defendant is strictly liable to Plaintiff Allstate Insurance Co. in the amount of \$27062.97.

4.

This paragraph constitutes written notice that Plaintiffs shall be entitled to receive interest on the claimed sum from Defendants if Defendants fail to pay the claimed sum within thirty (30) days from receipt of this notice unless, upon the trial of this case, the judgment is for an amount less than the sum claimed. This notice is being given pursuant to O.C.G.A. 51-12-14, Unliquidated Damages Interest Act.

The interest shall be at the rate of 12% per annum and shall begin to run from the thirtieth day following the date of service of this notice until the date of judgment.

5.

Plaintiffs are entitled to recover one third (1/3) attorney's fees pursuant to O.C.G.A. 13-6-11 on the grounds that Defendants has been stubbornly litigious and has caused Plaintiffs unnecessary trouble and expense by forcing Plaintiffs into the courts when no "bona fide controversy" exists.

WHEREFORE, Plaintiffs respectfully demands judgment against Defendants for the principal amount set forth above, prejudgment interest and attorney fees and that a writ of Fieri Facias issue.

REQUESTS FOR ADMISSION

1. On or about May 30, 2000 Defendant Ford Motor Corporation manufactured a defective 1999 Ford Expedition, which contained a faulty electrical wiring in the engine compartment. The defendant's defective product proximately caused property damage in the amount of \$27062.97 to the Plaintiff's insured's property.
2. The Defendant is strictly liable to Plaintiff Allstate Insurance Co. in the amount of \$27062.97.

Mary A. Miller & Associates LLC

Mary A. Miller, GA Bar No. 215450

Candace M. Fair, GA Bar No. 254154

Mike O. Crawford IV, GA Bar No. 194165

Attorneys for Plaintiff

5555 Oakbrook Pkwy Suite 670
Norcross GA 30093
(678) 966-9792

02-6581-

Cobb
IN THE STATE COURT OF ~~SHERIDAN~~ COUNTY
STATE OF GEORGIA


PLAINTIFF
V.
FORD MOTOR CORPORATION,
DEFENDANT.

CIVIL ACTION NO. 2002A

Notice of Leave of Absence

COMES NOW Mary A. Miller, Candace M. Fair, and Mike O. Crawford IV attorneys for Plaintiff, and hereby notify the Court pursuant to Uniform Superior/State Court Rule 16.1 as follows:

1. Plaintiff's counsel will be out of town and/or on vacation and will be absent from all proceedings including trials, hearings, and depositions in the above-matter during the following dates:

May 28-31, 2002
July 1-5 and 7-8, 2002.

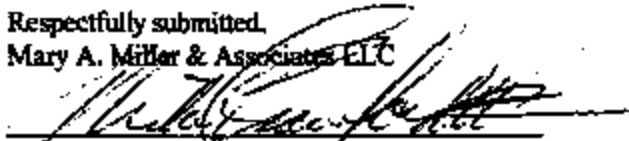
June 3, 4, 21 and 24-28, 2002

2. The Defendant has been notified of Plaintiff's Counsel's Leave of Absence by copy of this Notice.

CERTIFICATE OF SERVICE

Plaintiff's attorneys certify that they served a copy of this Leave of Absence to the Defendant by attaching a copy to the complaint.

Respectfully submitted,
Mary A. Miller & Associates LLC


Mary A. Miller, GA Bar No. 215450
Candace M. Fair, GA Bar No. 254154
Mike O. Crawford IV, GA Bar No. 194165
Attorneys for Plaintiff

5555 Oakbrook Pkwy Suite 670
Norcross, GA 30093
(678) 966-9792 Fax: (678) 966-9795

JAMES L. GIBSON
STATE COURT CLERK
2002 JUN 21 AM 11:05
FORD MOTOR CO. GA
CIVIL ACTION NO. 2002A

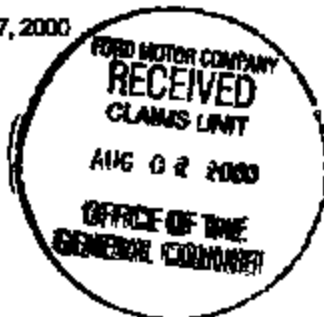
Allstate Insurance Co.

P.O. Box 108827
Atlanta, GA 30348
(770) 816-8107
(FAX) 926-8114
a22nd@allstate.com

Allstate
You're in good hands.

July 27, 2000

Ford Motor Corp
OGC Product Claims
Suite 400
Parklane Towers West
3 Parklane Blvd
Dearborn, MI 48126



RE: Claim Number: [REDACTED]
Our Insured: [REDACTED]
Date of Loss: 5/30/00
Vehicle: 1998 Ford Expedition
VIN #: 1FMRU17B4JG [REDACTED]
Mileage: 28,008

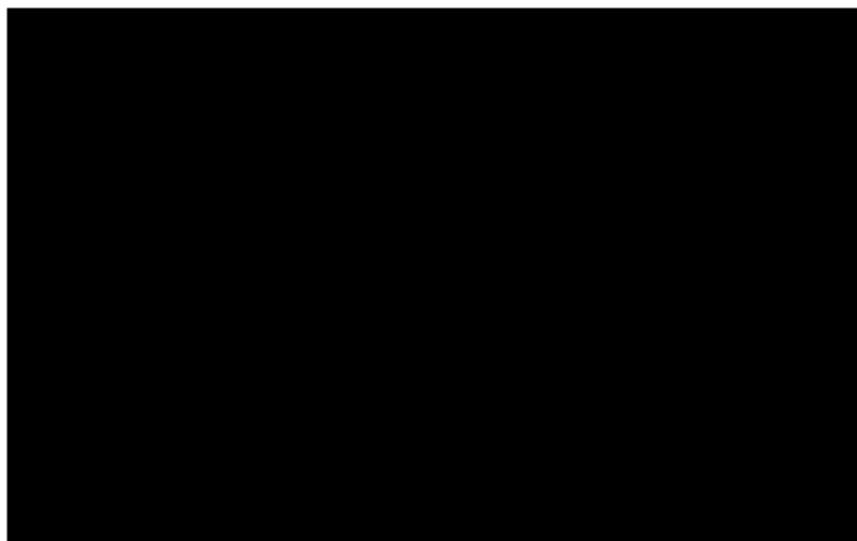
Gentlemen:

Please be advised that this letter is our subrogation notice for amounts paid under our insured's policy of insurance with Allstate. We paid out \$27,062.97 for the above captioned vehicle for a claim for fire damage that was determined to be caused by an electrical fault. The vehicle will be available for 45 days for your inspection and is located at: Sedeco of Atlanta, [REDACTED] Lake City GA [REDACTED]
[REDACTED] Stock Number 1009021.

Sincerely

A handwritten signature in cursive script that appears to read "Jay Daniel".

Jay Daniel
Allstate Auto Specialty Investigator



FIRE LOSS ANALYSIS, INC.

P.O. BOX 188317

SAN ANTONIO, TEXAS 78281

TELEPHONE
(214) 344-2781TELECOPIER
(214) 344-8785

September 8, 2004

Invoice #004-7672

FLA #A09-004-4931

Claim # [REDACTED]
[REDACTED]Mr. John Gonzalez
Allstate Insurance
4717 S. Loop 289
Lubbock, Texas 79424

Attn: Mr. Gonzalez

		Vehicle Set Rate	=	\$1,000.00
Mileage (split)	: 300 miles	@ .34 per mile	=	\$102.00
Secretarial	: 3.00 hours	@ \$13.00 per hour	=	\$39.00
		Subtotal	=	\$1,141.00
		Sales Tax 7.75%	=	\$88.43
		TOTAL AMOUNT DUE	=	\$1,229.43

EIN #74-2892330

PLEASE RETURN COPY OF FIRST PAGE WITH REMITTANCE**PAST DUE BALANCES THIRTY (30) DAYS AND OVER SHALL BEAR INTEREST
AT THE RATE OF 18% PER ANNUM.**

<p>CLAIM NUMBER</p> <p>13</p> <p>11/29</p>	
<p>CLAIM SERVICES RENDERED</p> <p>ONE THOUSAND TWO HUNDRED TWENTY NINE DOLLARS AND</p> <p>AS LENT *****</p>	
<p>015V</p>	<p>09 14 04</p>
<p>74208760 2</p>	
<p>ALLSTATE INSURANCE COMPANY OR ONE OF ITS AFFILIATES</p>	
<p>COMPANY NAME</p> <p>ALLSTATE COUNTY MUTUAL</p> <p>INSURANCE COMPANY</p>	
<p>FILE COPY NON-NEGOTIABLE</p>	

TO THE ORDER OF FIRE LOSS ANALYSIS, INC.
P.O. BOX 100317
SAN ANTONIO TX 78261

ALLSTATE
Always in good hands.

YOU MUST PRESENT THIS CHECK WITHIN THE SPECIFIED TIME OF THE DATE OF LOSS

8005-005-101-2248

DESK: SIR INVOLVED PERSON STATEMENT
159 523281 8 DOL - 08 - 08 - 2024 INSD: SANDRA
ID: 01

PAGE: 1 OF 1
ANGELL

OWNER

HOME PHONE:

BUS PHONE:

HRS:

DATE: 09 - 18 - 2024

STMT EMPL NAME: SYSTEM

EFFECT ON INSD LIAB AND/OR CLMT DAMAGES: 0 (0=NONE 1=FAV 2=UNFAV)

NOTIFY:

ANALYSIS:

FIELD CLAIM PAYMENT, ALLSTATE COUNTY MUTUAL INSURANCE COMPANY, CHECK ID
[REDACTED] WAS ISSUED TO FISHER-VINCENT FORD, INC. ON 09/18/2024 FOR \$400.46,
FOR HH01 (COVERAGE CLOSED) FOR \$400.46 WITH TR001, PAYMENT FOR COMPREHENSIVE
COVERAGE FOR LOSS OF 08/30/2024, BY ADJUSTER KZPV.

PF5-SCHED F/U PF7-BACKWD PF8-FRWD PF9-PRINT PF11-PREV STMT PF12-NEXT STMT
*** THIS IS A SYSTEM GENERATED STATEMENT THAT CANNOT BE UPDATED ***

ALLSTATE INSURANCE COMPANY
"WEST TEXAS MCO"
4717 S. LOOP 289
LUBBOCK, TEXAS 79424

BLC

CD LOG NO 3435 -1

09-03-04 4:26 PM
09-16-04 1:24 PM

CLAIM INFORMATION

CLAIM # [REDACTED]
COMPANY ALLSTATE CTRY MUTL
INSURED [REDACTED]
CLAIMANT [REDACTED]
FILE HNDLR BLC

POLICY # [REDACTED]
CLAIM REF DESK/HEC/1598-W-TX
LOSS DATE 08-30-04
LOSS TYPE COMP/FIRE
FILE #

INSPECTION

TYPE FIELD
PRIMARY POI NON-COLLISION
APPRAISER NAME DAVID WILLIAMS
WORK PHONE (800) 669-7599
ADDRESS 451-D E. CEN.TX. EXPWY.
CITY STATE HARKER HEIGHTS TX
ZIP 76548-

SECOND POI

FAX (254) 699-8644
INSP DATE 09-03-04
LOCATION FISHER VICENT FORD
CITY STATE BELTON TX

OWNER

MOODY TX

WORK# [REDACTED]
HOME# [REDACTED]

REPAIR

FISCHER VINCENT FORD
2501 S IH 35
BELTON TX
SHOP PHONE (254) 939-3541

CAR IN
CAR OUT
REPAIR 4 DAYS
FAX

VEHICLE

1995 FORD F-150 XLT 2 DR EXT CAB
8CYL GASOLINE 5.0

OPTIONS

TWO-STAGE - EXTERIOR SURFACES
POWER DOOR LOCKS
AUXILIARY FUEL TANK
TILT STEERING WHEEL
AUTOMATIC TRANS
DRIVER SIDE AIR BAG

BUMPER STRIPS
POWER WINDOWS
REAR BUMPER
AIR CONDITIONING
CRUISE CONTROL

BODY COLOR BLUE/WHITE
CONDITION GOOD
LICENSE # 9JBP09
LICENSE STATE TX

MILEAGE 163,000
VIN 1FTEX15N0SK [REDACTED]
CODE P814
VEH INSP #

RD F-150 XLT 2 EXT CAB
1595232818H01

LOG 3435 -1

03-04 4:26 PM
S1 09-16-04 1:24 PM

***** FCP ISSUED CHECK TO SHOP FOR SUPPLEMENT *****

MENT WITHOUT PRIOR APPROVAL AND INSPECTION NO EXCEPTIONS.
T HOTLINE FOR REPAIR SHOPS TO CALL 1-877-599-7759, 8AM-4:30 PM.
D CHECK TO OWNER

R-ENTERED VALUE	E = REPLACE OEM	NG = REPLACE NAGS
PETITIVE PART	UC = RECONDITIONED PRT	UM = REMAN/REBUILT PRT
YCLED PART	EP = COMPETITIVE PART	PC = PXN RECONDITIONED
REMAN/REBUILT	TE = PARTL REPL PRICE	ET = PARTL REPL LABOR
TIAL REPAIR	I = REPAIR	L = REFINISH
ND REFINISH	TT = TWO-TONE	CG = CHIPGUARD
LET	N = ADDITIONAL LABOR	RI = R&I ASSEMBLY
ICK	AA = APPEAR ALLOWANCE	RE = RELATED PRIOR
ELATED PRIOR		

IC DESCRIPTION	MFR. PART NO.	PRICE	AJ%	B%	HOURS	R
SKIRT, INNER FENDER	LT COMPETITIVE PART	41.00			1.2	1
STEAM CLEAN ENGINE	SUBLET	35.00*				1
RESET ELECTRICAL COMPO	ADDITIONAL LABOR				0.5*2	
BLEED BRAKES	ADDITIONAL LABOR				0.5*1*	
STERRING SHAFT SLEAVE	RECYCLED PART	25.00* +25			0.5*2*	
MASTER CLY. AND BRAKE	RECYCLED PART	75.00* +25			1.0*2*	
DER SALVAGE (254) 657-2747 OR 800-460-8025.	EDDIE, PAUL OR GREG.					
SIE REQ# 63047. BOOSTER MAY NEED OEM (NOT WARRENTIED)						
THROTEL BODY CABLES	RECYCLED PART	150.00* +25			0.5*2*	
DER SALVAGE (254) 657-2747 OR 800-460-8025.	EDDIE, PAUL OR GREG.					
SIE REQ# 63047.						
WIRE HARNESS	RECYCLED PART	625.00* +25		S1	5.5*2*	
DER SALVAGE (254) 657-2747 OR 800-460-8025.	EDDIE, PAUL OR GREG.					
SIE REQ# 63047. OEM MAY BE NEEDED DUE TO ELE. PARTS.						
CAUSE OF FIRE	CHECK	INC*		S1		2
.82 CRUISE DEACTIVATION SWITCH WAS CAUSE OF FIRE.						

S

LCULATIONS & ENTRIES

PARTS
PARTS
MATERIAL

\$ 916.00

NTS
TEMS
TOTAL

DISCOUNT

MARKUP

\$ 218.75

\$ 1,134.75

1995 FORD F-150 XLT 2.3 EXT CAB

09-03-04 4:26 PM

CLAIM #

LOG 3435 -1

S1 09-16-04 1:24 PM

TAX ON PARTS & MATERIAL @ 8.250%

\$ 93.62

LABOR	RATE	REPLACE HRS	REPAIR HRS	
1-SHEET METAL	\$ 38.00	1.2	0.5	\$ 64.60
2-MECH/ELEC	\$ 65.00	7.5	0.5	\$ 520.00
3-FRAME	\$ 40.00			
4-REFINISH	\$ 38.00			
5-PAINT	\$ 24.00			

LABOR TOTAL \$ 584.60

TAX ON LABOR @

SUBLET REPAIRS \$ 35.00

TOWING

STORAGE

GROSS TOTAL \$ 1,847.97

LESS: DEDUCTIBLE \$ 500.00-

NET TOTAL \$ 1,347.97

LESS: PREVIOUS NET TOTAL \$ 848.51-

NET SUPPLEMENT TOTAL \$ 499.46

PXN Y/00/00/00/00/00 CUM 01/01/00/00/00 Geocode: 78701 AUSTIN

SPPL Yes Geocode: 78701 AUSTIN

ADP PENPRO W0405 S1 LOG3435 -1 09-16-04 13:43:48 REL 4.05 SW07/04 DT07/04

(C) 1993 - 2003 ADP CLAIMS SOLUTIONS GROUP, INC.

IMPORTANT INFORMATION ABOUT ALLSTATE'S CHOICE OF PARTS POLICY

THIS ESTIMATE MAY LIST PARTS FOR USE IN THE REPAIR OF YOUR VEHICLE THAT ARE MANUFACTURED BY A COMPANY OTHER THAN THE ORIGINAL MANUFACTURER OF YOUR VEHICLE. THESE PARTS ARE COMMONLY REFERRED TO AS AFTERMARKET PARTS OR COMPETITIVE PARTS, AND MAY INCLUDE COSMETIC OUTER BODY CRASH PARTS SUCH AS HOODS, FENDERS, BUMPER COVERS, ETC. ALLSTATE GUARANTEES THE FIT AND CORROSION RESISTANCE OF ANY AFTERMARKET/COMPETITIVE OUTER BODY CRASH PARTS THAT ARE LISTED ON THIS ESTIMATE AND ACTUALLY USED IN THE REPAIR OF YOUR VEHICLE FOR AS LONG AS YOU OWN IT. IF A PROBLEM DEVELOPS WITH THE FIT OR CORROSION RESISTANCE OF THESE PARTS, THEY WILL BE REPAIRED OR REPLACED AT ALLSTATE'S EXPENSE. THIS GUARANTEE IS LIMITED TO THE REPAIR OR REPLACEMENT OF THE PART.

HOWEVER, IF YOU CHOOSE NOT TO USE ONE OR MORE OF THE AFTERMARKET/COMPETITIVE OUTER BODY CRASH PARTS THAT MAY BE LISTED ON THIS ESTIMATE IN THE REPAIR OF YOUR VEHICLE, ALLSTATE WILL SPECIFY THE USE OF ORIGINAL EQUIPMENT MANUFACTURER PARTS, EITHER NEW OR RECYCLED AT ALLSTATE'S OPTION, AT NO ADDITIONAL COST TO YOU. ALLSTATE DOES NOT SEPARATELY GUARANTEE THE PERFORMANCE OF ORIGINAL EQUIPMENT MANUFACTURER PARTS, AND MAKES NO REPRESENTATION ABOUT THE AVAILABILITY OF ANY MANUFACTURER'S GUARANTEE.

1995 FORD F-150 XLT 2 EXT CAB

CLAIM #

LOG 3435 -1

09-03-04 4:26 PM

S1 09-16-04 1:24 PM

THIS ESTIMATE MAY HAVE BEEN PREPARED BASED ON THE USE OF CRASH PARTS SUPPLIED BY A SOURCE OTHER THAN THE MANUFACTURER OF YOUR MOTOR VEHICLE. THERE ARE WARRANTIES APPLICABLE TO THESE REPLACEMENT PARTS. THESE WARRANTIES ARE PROVIDED BY THE MANUFACTURER AND/OR DISTRIBUTOR OF THE PARTS, RATHER THAN BY THE ORIGINAL MANUFACTURER OF YOUR VEHICLE. ALL SHEET METAL COMPONENTS SHOULD ALSO BE CERTIFIED BY THE CERTIFIED AUTOMOBILE PARTS ASSOCIATION. THIS STATEMENT IS APPLICABLE TO PARTS IDENTIFIED WITHIN THE ESTIMATE AS A COMPETITIVE ECONOMY OR PXN REPLACEMENT PART.

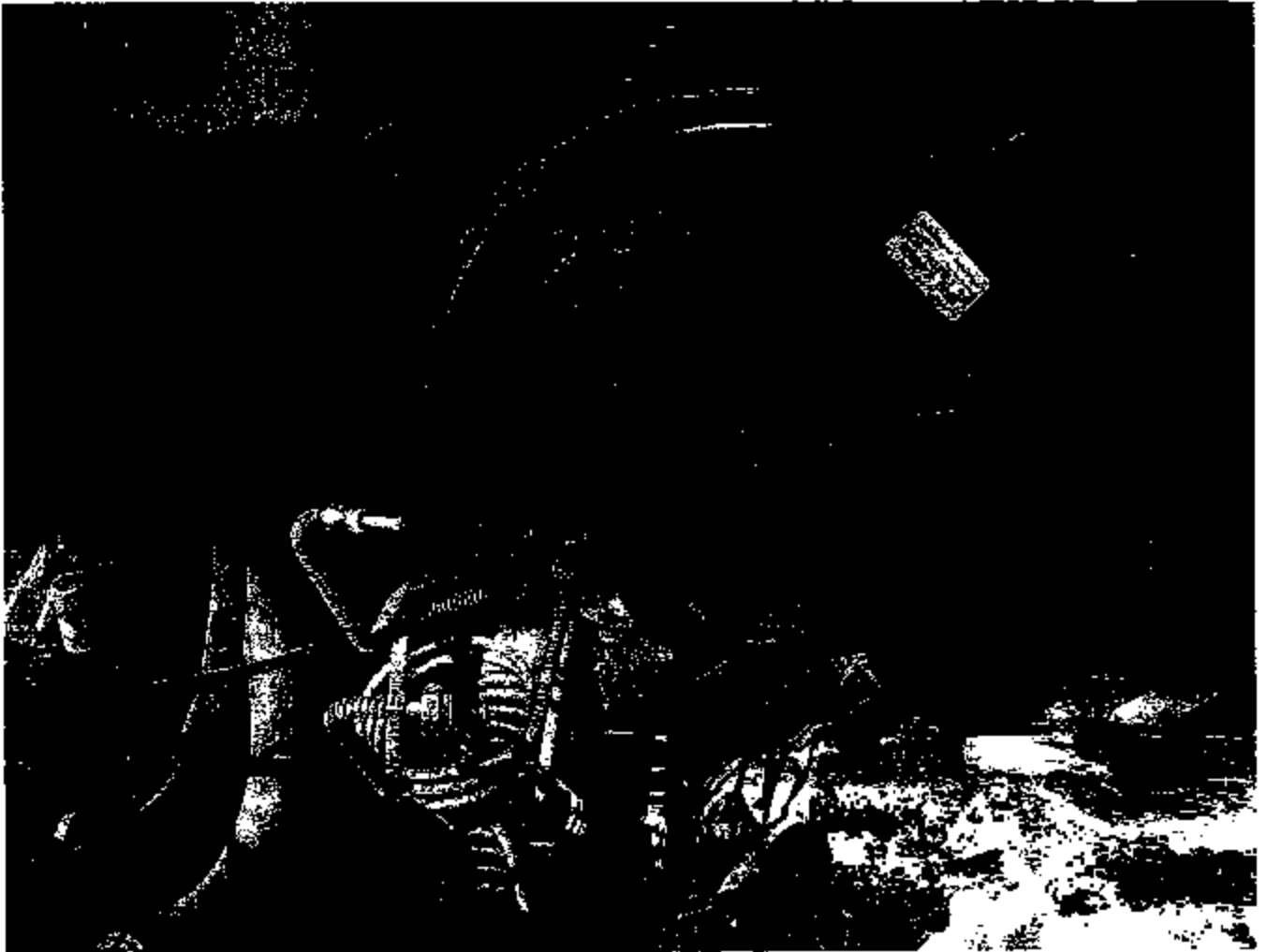
ESTIMATE REVIEWED WITH SHOP. YES _____ NO _____
APPROXIMATE NUMBER OF REPAIR DAYS _____

SIGNATURE _____ DATE _____

IF YOUR VEHICLE IS OF UNITIZED CONSTRUCTION, IN SOME CASES THE REPAIR SHOP MAY NEED SPECIAL EQUIPMENT TO PROPERLY REPAIR THE CAR. YOU SHOULD DETERMINE IF THE SHOP YOU SELECT TO COMPLETE THE REPAIRS IS PROPERLY EQUIPPED.

THIS ESTIMATE HAS BEEN EXPLAINED TO ME. I UNDERSTAND HOW MY CAR WILL BE REPAIRED. REPAIRS WILL BE DONE AT THE SHOP OF MY CHOICE.

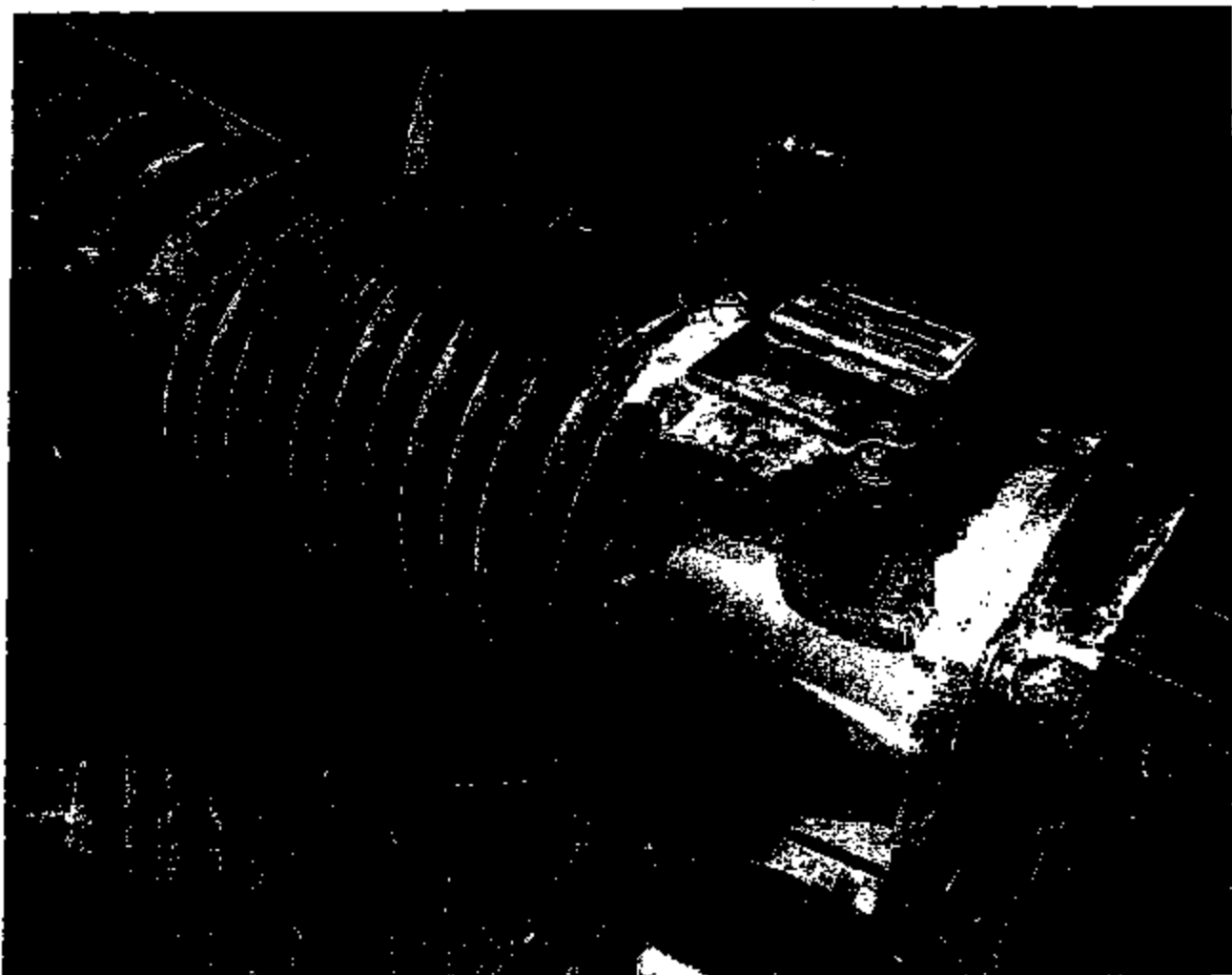
SIGNATURE _____ DATE _____
100% SATISFACTION IS OUR GOAL. YOUR COMMENTS ARE VALUED AND APPRECIATED.



EP25-825-LC1-2248



EROS-885-LC1-2247



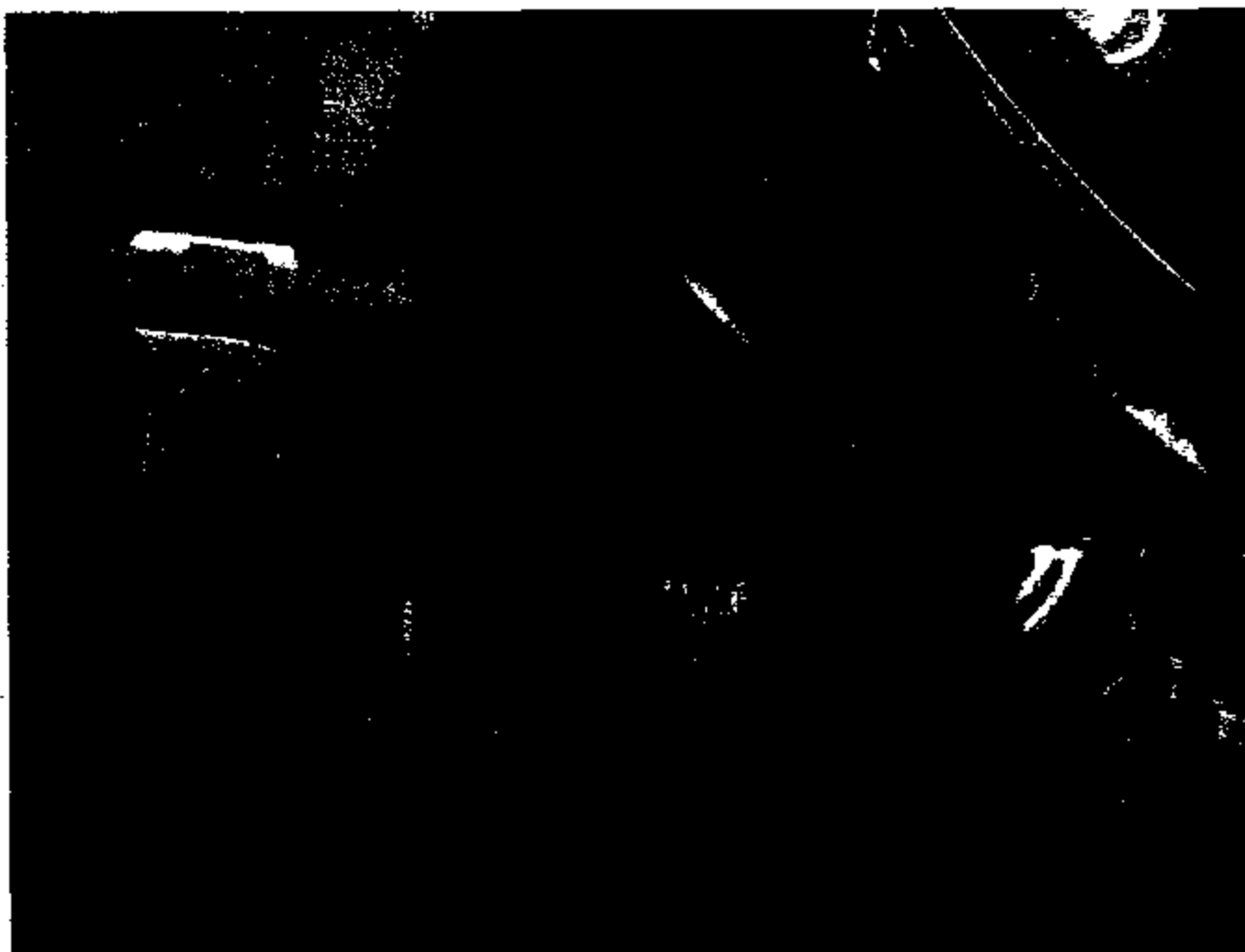
EP85-685-LC1-2248



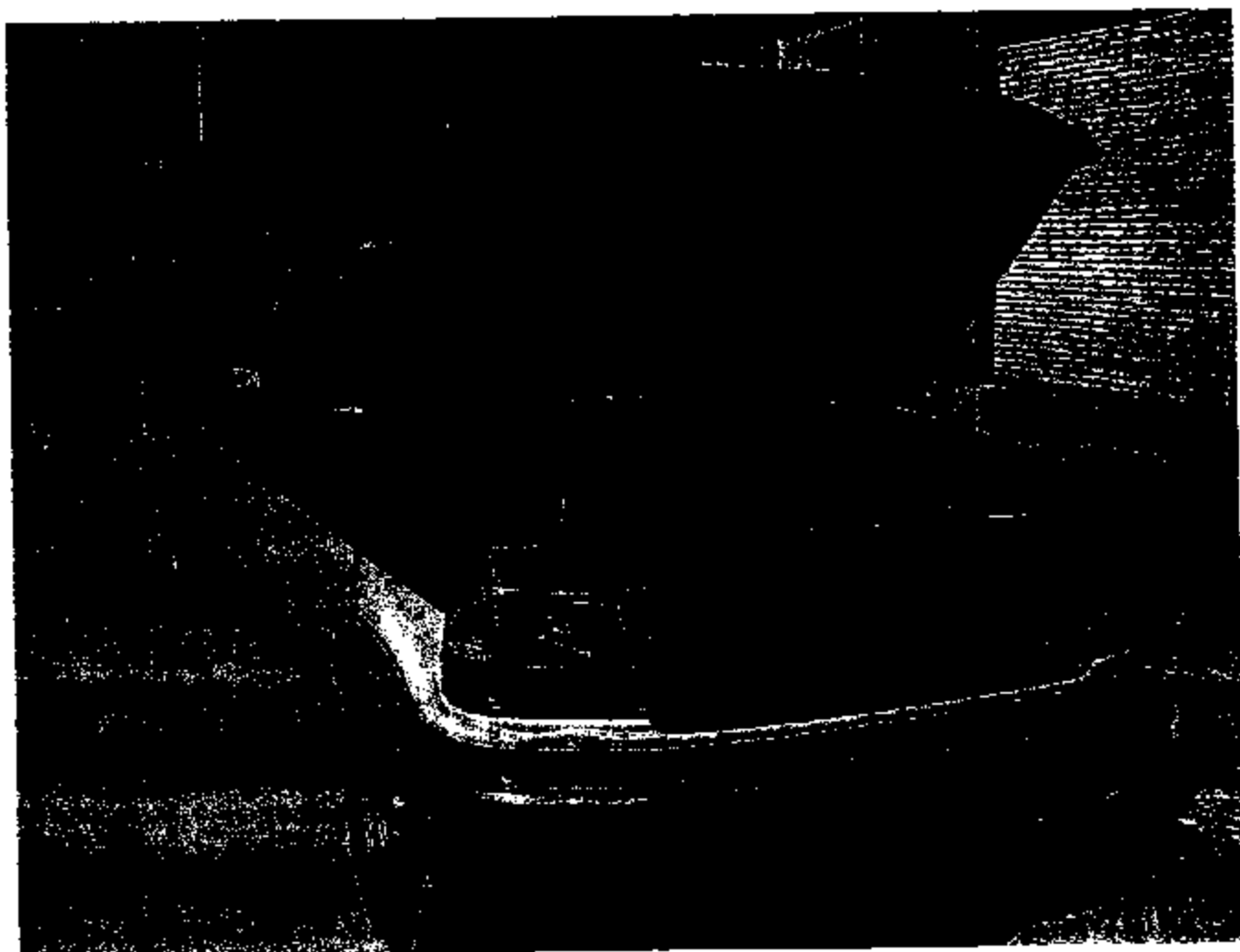
EA05-008-LC1-2249



ENG-005-LC1-2250



ERG-005-LC1-2251



ERG-005-LC1-2252

Allstate®

RECEIVED

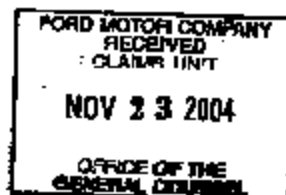
ALLSTATE COUNTY MUTUAL INSURANCE COMPANY
P. O. BOX 168208
IRVING TX 75016

(800) 374-4246

NOV 22 2004 11/15/04



FORD MOTOR CO
3 PARK LANE BLVD
DEARBORN MI 481262568



OUR INVESTIGATION INDICATES THAT YOUR INSURED WAS RESPONSIBLE FOR THIS LOSS.

SINCE WE HAVE ALREADY MADE A SETTLEMENT WITH OUR POLICYHOLDER, THE CLAIM HAS BEEN ASSIGNED TO US. COPIES OF THE FINAL PAPERS RELATING TO THE LOSS ARE ENCLOSED.

PLEASE ACCEPT THIS LETTER AS NOTICE OF OUR SUBROGATION CLAIM. PLEASE FORWARD YOUR PAYMENT WITH OUR CLAIM NUMBER TO:

ALLSTATE PAYMENT PROCESSING CENTER
P.O. BOX 227257
DALLAS, TX, 75222-7257

DIRECT ANY OTHER CORRESPONDENCE TO THE ADDRESS AT THE TOP OF THIS LETTER.

SINCERELY,

SUBROGATION CLAIM REP

ALLSTATE COUNTY MUTUAL INSURANCE COMPANY

YOUR FILE NO. : SELF INSURED
YOUR INSURED : [REDACTED]
ADDRESS : [REDACTED]

OUR CLAIM NO. : [REDACTED]
OUR INSURED : [REDACTED]
LOSS DATE : 08/30/04

LOCATION : [REDACTED]

AMOUNT OF LOSS: \$2,358.23

TROY

2005-005-LC1-2253

PRODUCED BY FORD

WSD 9/29/05

*7/24/04
UCB-yes
EUD-yes*

*8/30/04
TRM/TX
-2,358.23
-45 F-150
-1630000
-VIN*

CBP:G



CUSTOMER
RELATIONSHIP
CENTER

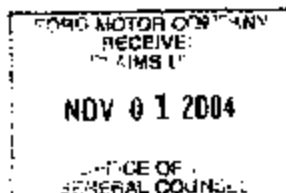


FARMERS OCT 29 A 11:08

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

10/25/2004

Ford Motor Company
Attn: Shawn Norton
P O Box 6248 McJ-3me-B
Dearborn, MI 48126



Re: Our Insured: [REDACTED]
Loss Date: 07/15/2004
Claim Number: [REDACTED]
Total Amount Owed: \$14,164.25

Dear Ms. Norton:

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

You will find this correspondence and its enclosures contain substantive information and support adequate for your firm to make a decision concerning your liability. *The vehicle will be available for your inspection within the next 60 days. Afterwards, we will be required to attempt to sell the salvage.*

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

Your product did not meet the expectations of my insured, the consumer. Your product failed and caused the loss resulting in damages of \$14,164.25. Attached are documents substantiating payment.

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

Sincerely,
Farmers Texas County Mutual Insurance Company

Santa Smith

BRB-005-LC1-2254

Scott Sheffield
Auto Subrogation Representative
512-234-5739

ENCLOSURES

ERG5-005-LC1-2295

RECEIVED DEC 1 6 2004

CONSUMER AFFAIRS
SECTION

563209



FARMERS

DEC 14 P4:00

National Document Center

P.O. Box 268992

Oklahoma City, OK 73126-8992

claimsdocument@farmersinsurance.com

Fax: 877-217-1389

12/08/2004

Shawn Norton
Ford Motor Company
P O Box 6248 Mid-Joe-B
Dearborn, MI 48126

DEC 13 2004

Re: Our Insured: [REDACTED]
Loss Date: 07/15/2004
Claim Number: [REDACTED]

Dear Ms. Norton:

We previously advised you of our subrogation rights in regards to the above-noted claim. Pursuant to your request enclosed herewith is our Cause & Origin report with color photographs.

Sincerely,
Farmers Texas County Mutual Insurance Company

Scott Sheffield
Auto Subrogation Representative
512-238-5739

?

~ 60,000 (M)
- ETP

Forensic Analysts, Inc.

**PRELIMINARY
REPORT OF FINDINGS**

CLAIM NO: [REDACTED]

INSURED: [REDACTED]

Prepared for:

**TEXAS COUNTY MUTUAL INSURANCE COMPANY
P.O. BOX 268994
OKLAHOMA CITY, OKLAHOMA 73126-8994**

ATTN: MR. GREG DANNA

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

August 25, 2004

FAI File No. 3385

0000-000-L01-2257

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- FORD VEHICLE INSPECTION	
- INTERVIEW WITH THE INSURED	
- RECOMMENDATION	
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I. INTRODUCTION

Reportedly, on July 15, 2004, a vehicle fire occurred involving a 2001 Ford F-150 vehicle. On August 6, 2004, Forensic Analysts, Inc. was retained by Mr. Greg Donna of Texas County Mutual Insurance Company to inspect the vehicle, and determine the origin and cause of the vehicle fire.

On August 6, 2004, Mr. Jeffrey Abrams, CFI, CFE, ASE, CVFI, of Forensic Analysts, Inc., inspected and photographed the Ford F-150 vehicle, located at Insurance Auto Auction, 2535 West Mount Houston Road, Houston, Texas, 77038.

A sample of automatic transmission fluid was taken, should an oil analysis be desired to help determine pre-fire condition of the transmission. This sample will be stored at the office of Forensic Analysts, pending further instructions from Texas County Mutual Insurance Company.

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

II. CONCLUSION

Forensic Analysts, Inc., inspected and photographed the 2001 Ford F-150 vehicle, and interviewed the insured.

In conclusion, based on our observations and the findings as noted in this report, it is our opinion that this 2001 Ford F-150 vehicle fire was primarily contained within the engine compartment, prior to mildly compromising the vehicle interior, by traveling through the firewall access holes and HVAC (Heating, Ventilation, and Air Conditioning) ductwork. The fire did not appreciably spread into the interior of the vehicle, other than compromising only the upper levels within the vehicle interior.

The area of lowest and most intense burn within the engine compartment area of this Ford F-150 vehicle was that in the left-rear corner. However, the intensity of burn, which was very widespread in this left-rear corner of the engine compartment, generated consumption of the brake master cylinder, separation of all electrical components relating to the brake master cylinder, and near-total consumption of all combustible materials in the left third of the engine compartment. A definitive determination, therefore, as to the exact cause of the vehicle fire cannot be determined.

Even though there is widespread documentation of fires that have a similar type of burn pattern, it must be noted that it is a requirement to label the cause of this engine compartment fire as undetermined, due to the lack of observation of separated components that could have contributed to the onset of this fire.

We attempted to take both engine oil and automatic transmission fluid samples on this vehicle. Due to the valve covers having been primarily consumed, all engine oil had been displaced by rainwater. Additionally, the automatic transmission fluid sample taken was proper for this year, make, and model

vehicle. It was dark red in color, heavily oxidized, potentially in need of service, but inconsistent with any transmission problems, inconsistent with any type of contaminants within the automatic transmission fluid, and inconsistent with any problems that could have contributed to the onset of this engine compartment fire. A sample of automatic transmission fluid will be stored at the office of Forensic Analysts pending further instruction from Texas County Mutual Insurance Company.

III. DISCUSSION

According to the information know to us at this time, this Ford F-150 vehicle was brought to the dealership by the insured, to find a short. However, on the occasions that the vehicle was brought into a Ford dealership, the Ford dealership did not have time to affect repairs. Reportedly, however, related to the facts of loss to this claim, the vehicle had been sitting in a parking lot, and was unattended, and was not in operation, when the vehicle fire occurred.

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

FORD VEHICLE IDENTIFICATION

The vehicle was identified as a black four-door, 2001 Ford F-150 vehicle, bearing Texas license plate number [REDACTED] and vehicle identification number 1F1X17271K[REDACTED]. The vehicle was manufactured in December of 2000. The vehicle registration and inspection stickers were consumed. At the time of our inspection, the odometer was consumed.

FORD F-150 VEHICLE INSPECTION

Our inspection of the vehicle exterior, which relates to pre-existing body damage, revealed that there was indeed a sideswipe-type of a scrape and scuff mark, extending from the rear portion of the left-rear door panel, all the way to the rear portion of the left truck pickup bed side. The markings were consistent with a sideswipe-type of a motion from the front to the rear, consistent with pre-existing body damage that may not have been repaired.

This body damage contained a crush from the left to the right, between one and two inches (1" and 2"). Again, this is consistent with a sideswipe-type of an impact, traversing at least the rear half of the Ford F-150 vehicle.

The remainder of the vehicle, however, contained no evidence of any significant body damage. And not only was there no evidence of any significant body damage, all of the film thickness surrounding the vehicle exterior was proper for this year, make, and model vehicle. There was no evidence of any significant repairs that had been performed to the vehicle either. This, of course, needs to be confirmed with conversations with the insured.

The same statement relating to the body damage on the exterior left truck bed side was observed on the exterior right truck bed side, continuing from the rear portion of the right-rear door panel, to the very rear portion of the right truck bed side. Obviously, both left side and right truck bed sides had experienced a sideswipe-type of a motion, and there was no evidence of any repairs having been performed. Both of the areas of damage could be consistent with pre-existing body damage.

Our inspection of the vehicle exterior, which relates to vandalism, theft, or violation of the vehicle exterior, revealed no substantial evidence of any problem at all. All components were intact and attached during the course of the fire. This included even the separated left-side and right-side exterior mirrors. There was no evidence of forced compromise into a locked vehicle door panel without utilizing the proper door key. More specifically, there was no evidence of violations surrounding the left-side or right-side door lock/handle assemblies to indicate forced entry into a locked vehicle without the use of the proper door key. Please note, however, that forced entry is a moot point, due to the fact that all exterior window glass was shattered as a result of the fire.

Additionally, the tailgate and all wheels and tires were still intact and attached as well. There was no evidence of any keying or aggravated scrape marks on the exterior painted surface. All evidence is purely consistent with there not having been an aggravation, vandalism, or violation of the vehicle exterior that would relate to vandalism or vehicle theft.

Our inspection of the vehicle exterior, which relates to a vehicle fire, revealed that the fire was primarily contained to the engine compartment area, specifically:

1. There was no burn of consequence surrounding the rear chromed steel bumper, or plastic composite bumper step ledge.
2. The tailgate on this vehicle was intact and attached, obviously not taking as part of a vehicle theft, and also completely unburned.
3. Both right-rear and left-rear OEM (Original Equipment Manufacturer) aluminum alloy mag wheels and tires were intact and attached, and still fully inflated at the time of our inspection, unrelated to any vehicle theft.
4. As we continue to move forward, it must be noted that both the right and left trunk bed sides were unaffected by this fire. Obviously, as previously stated, they were both scraped and scuffed consistent with a sideswipe-type of a motion, but they showed no compromise as a result of exposure to a vehicle fire.
5. As we continue to move forward, it must be noted that the rear windshield was primarily shattered, but still contained a significant amount of windshield glass that was intact surrounding the entire

rear windshield frame. Simply stated, this is the first evidence of compromise as a result of exposure to heat, and consistent with a fire that traveled to, and did not originate around, the rear portion of the vehicle interior.

6. As we continue to move forward, it must be noted that both right-rear and left-rear door panels were intact and attached, and still fully intact and uncompromised as a result of exposure to any heat, smoke, or fire.
7. As we continue to move forward, it must be noted that the right-front door panel was nearly ninety-percent (90%) intact. The paint was unburned, with the exception of the top half of the front twelve inches (12") of the right-front door panel. The remaining ninety-percent (90%) of the paint was unaffected by this fire. Additionally, it must be noted that the right-side exterior mirror was only mildly melted and deformed as a result of exposure to heat; it was still attached to the vehicle at the time of our inspection.
8. Comparing the right-side front door panel to the left-side front door panel, it must be noted that the left-side exterior mirror had separated from the vehicle as a result of the fire. And the front eighteen inches (18") of the left-front door panel was severely burned, consuming fifty-percent (50%) of this section of the paint. Nearly eighty-percent (80%) of the paint was intact and attached and unaffected by this vehicle fire on the left-front door panel, but all indicators point to a fire that was much more intense on the left side than the right side front door panel.
9. Both right-side and left-side front door panel glass was shattered as a result of the fire.

10. The front windshield was shattered as a result of the fire. In fact, there was no evidence of any glass adhering to the front windshield frame at the time of our inspection.
11. As we continue to move forward, it must be noted that ninety-percent (90%) of the paint was consumed surrounding the left-front fender. The only section of unconsumed paint was that immediately in front of the left-front door panel. The identical observation was made on the right-front fender, consistent with a very intense burn within the engine compartment.
12. The entire vehicle hood was consumed in this very intense engine compartment fire. All that was remaining were some deposits of molten, resolidified aluminum on the rear-situated hood hinges.
13. All components on the front of the vehicle were primarily consumed or separated during transport, including the front headlamp assemblies, vehicle front grille, and rubber and plastic composite components surrounding the front-chromed steel bumper.
14. The right-front tire and wheel assembly was severely burned to the point of deflating the right front tire. The right-front wheel was still, however, fully intact at the time of our inspection. The left-front tire and wheel assembly was burned to the point of consuming virtually the entire tire, and nearly fifty-percent (50%) of the wheel. Obviously, the burn intensification was significantly greater on the left side than the right side of the engine compartment.

In summary of our inspection of the burn patterns on the vehicle exterior, all evidence is purely consistent with a fire that was nearly contained within the engine compartment, that traveled from primarily the left side of the engine

compartment, toward the interior, and not vice versa. The intensification of burn on the left half of the engine compartment was amplified by the near consumption of the left-front tire and wheel assembly.

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

1. The severely burned remains of the interior rear bench seat. Please note, however, that we observed a significant amount of unconsumed combustible materials and foam material on the rear bench seat.
2. We observed the severely burned front two-bucket seats. Again, please note that the majority of the front two-bucket seats were intact and attached, and only consumed on the top half in the seat back. This is consistent with a relatively upper level, but relatively mild interior fire.
3. All interior door panels were only severely burned on the top half, and only partially consumed immediately neighboring the shattered windows, again, consistent with a relatively upper-level fire.
4. All flooring material throughout the vehicle interior was intact and attached, and experienced negligible burn, again, consistent with a very interior upper-level burn.
5. The vehicle dash was severely burned, but only on the top half, and was only consumed in the relatively open-air environment in the center third.

6. The steering column was severely burned, and the steering wheel, which was an aluminum alloy material, was only consumed on the top third. This, again, is purely consistent with an interior burn that was very upper level.
7. Both passenger side and drive side airbag assemblies were intact and attached, and not deployed as a result of the fire.
8. There was a significant amount of unconsumed combustible materials surrounding both the right-side airbag assembly, as well as above the bracketry, relating to the steering column.
9. Only the rear portion of the air-conditioning evaporator core housing was consumed, consistent with a fire that was traveling from the engine compartment through the HVAC (Heating, Ventilation, and Air Conditioning) ductwork, and firewall access holes into the interior, and not vice versa. The evaporator core and heater core were primarily intact at the time of our inspection, purely consistent, again, with a fire that did not originate anywhere around the vehicle interior.
10. There were burned, molten, and resolidified plastic deposit remains surrounding the left-side interior fuse box. Therefore, an assessment of the fuses could not be made at the time of our inspection.

In summary of our inspection of the burn patterns observed within the vehicle interior, all evidence is purely consistent with a fire that was traveling from the engine compartment through the HVAC (Heating, Ventilation, and Air Conditioning) ductwork and firewall access holes into the vehicle interior, and not vice versa.

Our inspection of the engine compartment revealed this vehicle was equipped with a V6 multi-port fuel injected engine, and automatic transmission. Specifically:

1. The burn within the engine compartment was very widespread, but distinctively less intense in the right-rear corner of the engine compartment. This was identified by the still intact, rear half of the aluminum alloy right-side engine valve cover.
2. Even though there was evidence of an unconsumed portion of an aluminum alloy valve cover, please note that virtually all combustible materials on the right third of the engine compartment were consumed. This included the materials that traversed the entire height of the engine compartment.
3. As we move from the right third of the engine compartment across the front of the engine, it must be noted that there was no aluminum alloy air-conditioning condenser or radiator in the engine compartment at the time of our inspection. Likely, these components were consumed, or may have partially separated during transport. All that can be stated, however, is that the fire did indeed intensify within the relatively open-air environment in the front of the engine compartment.
4. This fire intensification was noted, as well, by the observation of the consumed radiator cooling fan clutch, which was an aluminum alloy composition material, also in the open-air environment in the front of the engine compartment. This fire was indeed intense throughout the entire height of the open-air environment in the front of the engine compartment, and a flow pattern of the fire in this open-air environment could not be established at this point in

time.

5. The alternator was still attached to the right-front top corner of the engine at the time of our inspection. And its aluminum alloy housing is primarily intact, although distorted immediately above the consumed portion of the right-side engine valve cover.
6. The remaining of the accessories on the engine, however, including the power steering pump and air-conditioning compressor had separated. This separation was noteworthy on the left-side front portion, consistent with potentially the left side of the engine having been experiencing a greater amount of heat and fire intensification.
7. Consistent with our observation of greater fire intensification on the left side than the right side of the engine compartment, it must be noted that ninety-five-percent (95%) of the aluminum alloy left-side engine valve cover was consumed. Obviously, the fire was much more intense on the left side than the right side of the engine compartment.
8. Consistent with there having been no combustible materials remaining within the right third of the engine compartment, virtually all combustible materials were consumed in the left third of engine compartment as well.
9. The left-rear aluminum alloy brake master cylinder was consumed, and it separated from the vehicle prior to our inspection. The separation of this brake master cylinder also included a separation of all electronics surrounding the brake master cylinder. This included the brake pedal deactivation switch.

10. Immediately to the left of the primarily consumed brake master cylinder, it must be noted that we observed the primarily consumed power distribution center in the left-rear corner of the engine compartment. This power distribution center contained insulation-void wiring, and near total consumption of the plastic composite combustible materials. This is consistent with a relatively long-lived engine compartment fire that may have originated in the left-rear corner, due to the intensification of the fire as observed.
11. All wiring in the left-rear corner of the engine compartment was insulation-void, as was ninety-percent (90%) of the wiring throughout the engine compartment.
12. Consistent with the observation of a very widespread elevation of burn throughout the engine compartment, the burn throughout the left third of the engine compartment also traversed the entire height of the engine compartment.
13. Please note that the fuel injection fuel supply and return lines were connected and properly secured at the time of our inspection, inconsistent with a hose failure. As this vehicle reportedly had ignited while it was sitting in the parking lot, unattended, and not in operation, there would be no indication of ignition of gasoline fumes that may have leaked out.

FORD BRAKE PRESSURE SWITCH

Fires of this type in the left rear corner of the engine compartment on these Ford vehicles generate fire burn patterns that are consistent with fire burn patterns

that originate surrounding failed electronics of the brake master cylinder. More specifically, the brake pedal deactivation switch for the cruise control is secured to a boss in the front portion of the brake master cylinder. This fire burn pattern as observed is purely consistent with fire burn patterns that had been identified as originating from failed electronics surrounding the brake master cylinder. However, at the time of our inspection, there was no indication of remains of the pressure switch surrounding the brake master cylinder.

Even though this engine compartment contained no evidence of the separated remains of the brake master cylinder, or associated electronics, the numerous fires that are documented relating to these vehicles contain very similar burn patterns. However, the lack of observation of components that likely had separated prior to this inspection renders a definitive determination as to the exact cause of the fire as impossible. Therefore, the cause of this vehicle fire, that was most intense in the left-rear corner of the engine compartment, is labeled as undetermined.

INTERVIEW WITH THE INSURED

An interview with the insured, [REDACTED] who shall be further referred to as "he" in the body of the report), helped construct an order of events immediately preceding the onset of this vehicle fire:

1. He stated that he purchased the vehicle used from Bill Heard Chevrolet. He thought that he purchased the vehicle with approximately 41,000 miles on it.
2. He said that he thought the vehicle had approximately 60,000 miles on it at the time of the fire.

3. He said that he had been involved in an accident, and the accident that occurred while he was driving the vehicle was that of damage on the right truck bedside around the right rear wheel well. He said this damage had not been repaired prior to the onset of the fire.
4. He said that he had been experiencing problems with a fuse blowing on the vehicle. He was unaware that it was a blown fuse problem, until he took it into the dealership and the person that conceivably could perform the repairs was not going to be available for a few days. The insured therefore took it upon himself to replace the fuse a few times when problems persisted.
5. The problem that occurred, in which the insured literally took a fuse and replaced it, was that of the vehicle starting, but he was not able to shift it out of gear until he had a proper fuse in the fuse box. He was unable to tell me, however, which fuse number it was or what the amperage of the fuse was that he was installing. All that he stated, however, is that he was unable to drive the vehicle unless he replaced the fuse.
6. He said that on the date of the loss, he did notice that, obviously, the vehicle started and he was able to drive it. Therefore, this fuse was operating. He said that he was having some problems with the turn signal, but it seems to be unrelated to the fuse that he was replacing.
7. He said that on the date of the loss, he drove the vehicle to work, but he says he only lives about one-and-a-half (1½) miles from where he works.

E905-805-101-2273

8. After he parked the vehicle in the parking lot, the vehicle sat in the parking lot between six o'clock in the evening (6:00 p.m.) and two o'clock in the morning (2:00 a.m.). He said that at two o'clock in the morning (2:00 a.m.), he ended up moving the vehicle to a place where it is a little easier for him to exit the parking lot.
9. He said that he went back into work after he moved his vehicle, and about thirty (30) minutes later, a security guard called him and said that his vehicle was on fire.
10. He said that the security guard actually pulled the fire alarm, and the fire department came and extinguished the fire, but he said that the vehicle burned for nearly thirty (30) minutes prior to being extinguished.
11. He said that he had been experiencing problems for about two (2) weeks prior to the onset of the fire, in which he was replacing a fuse.
12. He said that he had not had any significant problems with the vehicle during the time that he has owned it, and the only repairs that have been done have been those associated with oil changes, which he does himself, and a brake job, in which an independent repair facility replaced his brakes.

The conversation with the insured is indeed consistent with symptoms relating to the ignition of combustible materials surrounding the electronics associated with the brake master cylinder electronics. Even though insufficient evidence of the remaining components associated with the brake master cylinder and surrounding electronics was observed, the burn patterns are still consistent with

that which was a result of ignition of combustible materials in the left-rear corner of the engine compartment.

RECOMMENDATIONS

We recommend that the 2001 Ford F-150 vehicle be retained, secured, and protected, regarding any further testing or inspection by other interested parties. We also reserve the right to be present, and observe any and all inspections or testing, of this Ford F-150 vehicle by any other concerned parties.

IV. BASIS OF REPORT

This report is based upon the following:

1. Inspection of the 2001 Ford F-150 vehicle.
2. Interview with the Insured.
3. Information and observations as noted in this report.

FD-302 (Rev. 11-27-70)

V. ATTACHMENTS

PHOTOGRAPHS

2005-005-LC1-2277

1. Front view of the Ford vehicle.
2. Left-side view of the Ford vehicle.
3. Right-side view of the Ford vehicle.
4. Rear view of the Ford vehicle.
5. View of the vehicle identification tag.
6. Overview of the unburned truck bed interior.
7. Overview of the limited shattering of the rear windshield.
8. Overview of the lack of compromise surrounding the left-side door lock/handle assembly area.
9. Overview of the lack of compromise surrounding the right-side door lock/handle assembly area.
10. Overview of the burned remains of the interior rear bench seat.
11. Overview of the burned remains of the front two bucket seats.
12. Overview of the burned remains of the vehicle dash, as viewed from the right.
13. Overview of the fallen, burned remains of what appears to be an OEM (Original Equipment Manufacturer) center third dash-mounted stereo.
14. Overview of the burned remains of the steering column.
15. Overview of the engine compartment.
16. View of the engine compartment, as viewed from the left.
17. View of the engine compartment, as viewed from the right.
18. Closer view of the right-side mounted aluminum alloy valve cover. Please note the partial consumption on the front.
19. Overview of the primary consumed left-side engine valve cover.
20. Overview of the intense burn in the left half of the engine compartment, as viewed from the front.
21. Overview of the intense burn and primary consumption of the left-rear engine compartment situated power distribution center, as viewed from the left.
22. Closer view of the area previously occupied by the consumed brake master cylinder.

2005-005-L01-ZZ70

1. Front view of the Ford vehicle.



2. Left-side view of the Ford vehicle.



August 25, 2004

Page 22

FBI File No. 005

BA05-005-LC1-2279

3. Right-side view of the Ford vehicle



4. Rear view of the Ford vehicle



5. View of the vehicle identification tag



6. Overview of the unburned truck bed interior.



7. Overview of the limited shattering of the rear windshield.



8. Overview of the lack of compromise surrounding the left side door lock handle assembly area.



EMD-803-LC1-2382

9. Overview of the lack of compromise surrounding the right-side door lock/handle assembly on a



10. Overview of the burned remains of the interior rear bench seat.



EP05-085-1C1-2263

11. Overview of the burned remains of the front two bucket seats



12. Overview of the burned remains of the vehicle at 20 ft. as viewed from the right



EQS-005-LC1-2284

13. Overview of the fallen, burned remains of what appears to be an 1984 (or so) Ford Taurus (or Manufactured center third dash-mounted stereo.

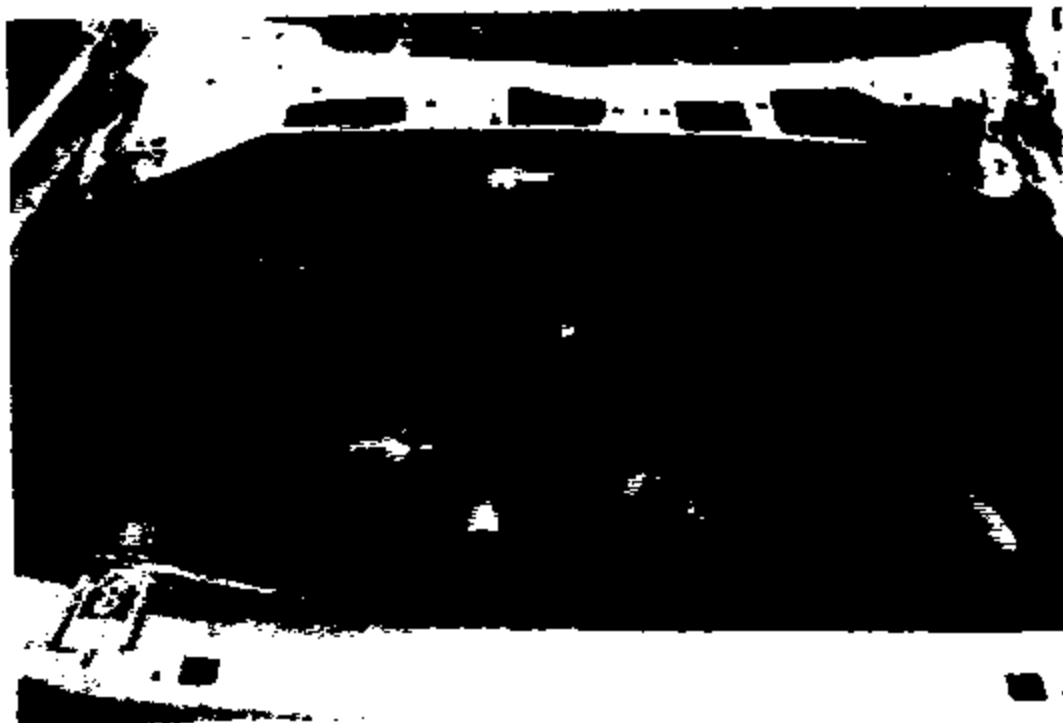


14. Overview of the burned remains of the steering column

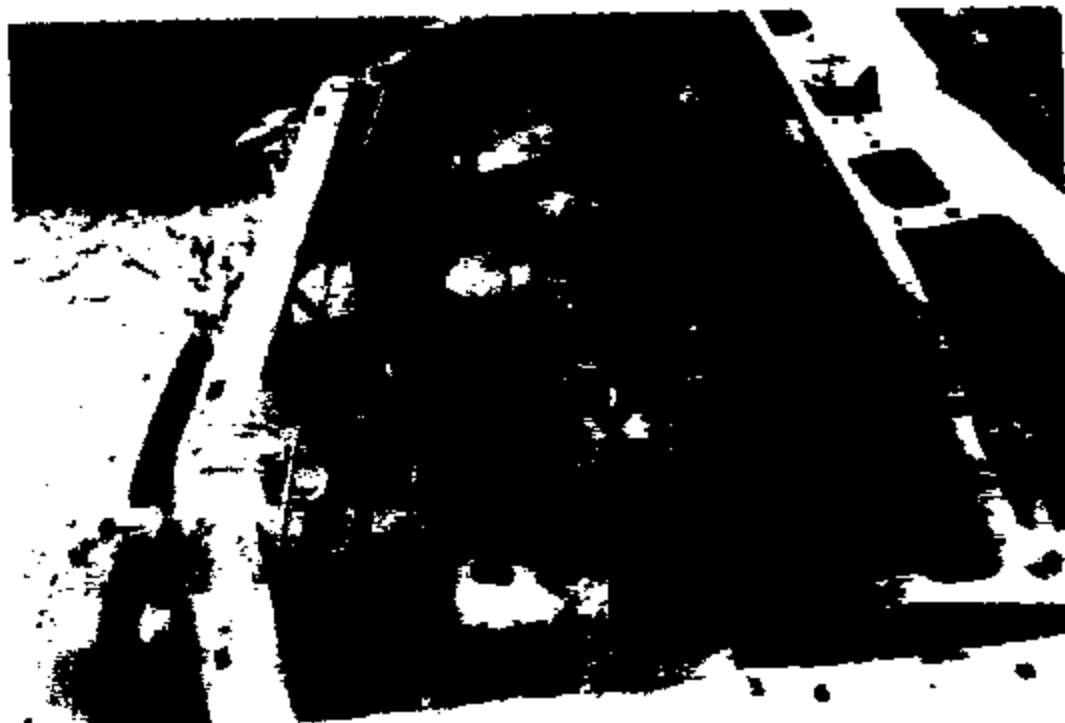


EN05-006-L01-2285

15. Overview of the engine compartment.



16. View of the engine compartment (2) viewed from the left

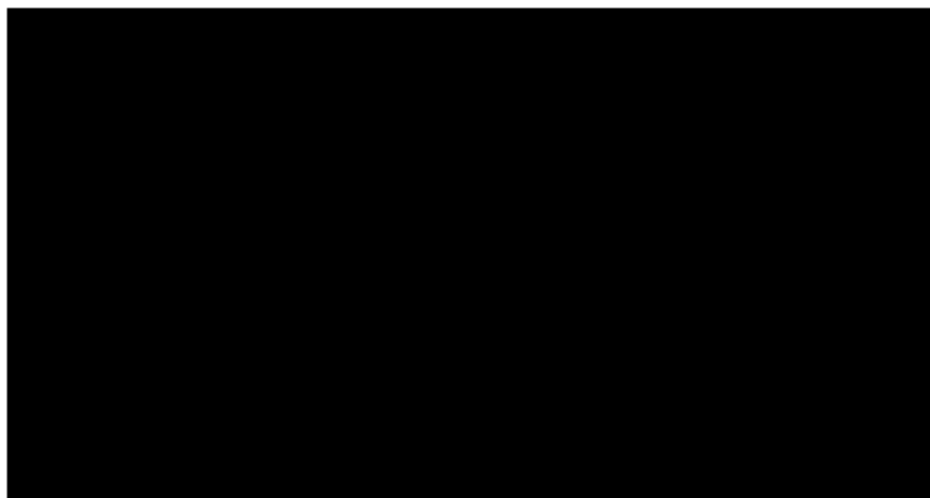


17. View of the engine compartment, as viewed from the right



18. Closer view of the right-side mounted aluminum alloy valve cover. Please note the pitting consumption on the front.





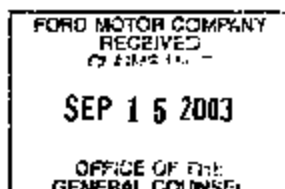
RECEIVED
SEP 15 2003



Certified - Return Receipt Requested and
Regular Mail

September 5, 2003

Ford Motor Company
Office of General Counsel
Parkland Towers West, Suite 300
Three Parkland Boulevard
Dearborn, MI 48126-2568



RE: Our Insured: [REDACTED]
Policy Number: [REDACTED]
Date of Loss: 07/27/2003

Dear Sir or Madame,

This letter is to advise you that our above Insured suffered a fire loss to their 2001 Ford Expedition. Our Insured advised Nationwide he was travelling down a roadway when the vehicle caught on fire in the engine compartment. Our initial investigation has indicated the fire originated in the engine compartment. Our Insured has further advised the vehicle was purchased new and is still under warranty by Ford Motor Company. This letter will serve to place you on notice that Nationwide may pursue a subrogation claim against Ford Motor Company should the cause be determined to be the responsibility of Ford Motor Company.

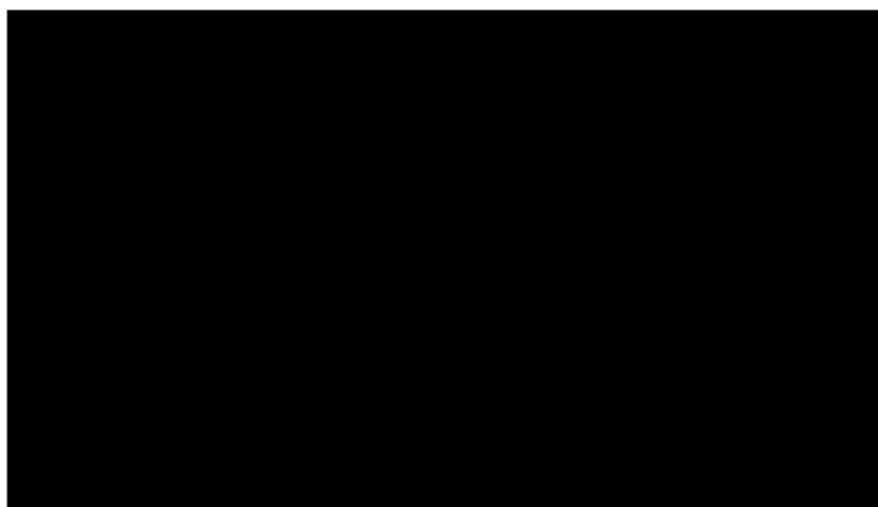
This letter will confirm Nationwide's intent to conduct a full Cause and Origin investigation on the subject vehicle. While we do not intend to cause any damage to the vehicle during our investigation, there is potential for damage. I would like to extend the opportunity for Ford Motor Company to have a representative present to participate in the examination.

A date and time for the examination have not been set. The vehicle is currently located at a secure salvage facility called Verastar which is located in Winder, GA. Please have your representative contact me and we will set a date and time mutually convenient for all parties to be present for the examination.

If you have any questions, please call me at 478-987-8153.

Sincerely,

Michael Smith
Special Investigator
Nationwide Insurance Company



PHILADELPHIA
ATLANTA
CHARLOTTE
CHERRY HILL
CHICAGO
DALLAS
DENVER
LAS VEGAS
LONDON
LOS ANGELES



NEW YORK
NEWARK
SAN DIEGO
SAN FRANCISCO
SEATTLE
TENTON
WASHINGTON, DC
WEST CONSHOHOCKEN
WICHITA
WILMINGTON

CONSUMER AFFAIRS
SECTION

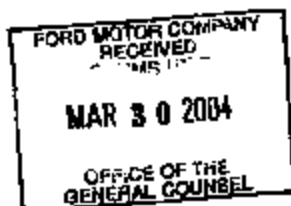
SUITE 1610 501 WEST BROADWAY SAN DIEGO, CA 92101-3357
619.234.1700 800.782.3366 619.234.7831 FAX www.cozen.com

4 MAR 30 10:34

BLANCA QUINTERO
BQUINTERO@COZEN.COM

March 26, 2004

Ford Motor Company
Customer Relationship Center
P.O. Box 6248
Dearborn, MI 48126



VIA EXPRESS MAIL

Re: Insured : [REDACTED]
Claim No. : [REDACTED]
Date of Loss : March 13, 2004
Loss Location : 571 N. Soho Lane, Chandler, Arizona 85225
File No. : 149831

Dear Customer Relationship Center:

We have been retained by Farmers Group of Insurance Company regarding subrogation recovery in this matter. Please direct all future correspondence in this matter to my attention.

This loss arises from a fire that occurred on March 13, 2004 and is believed to have originated within the engine compartment of a 1995 Ford F-150 pick-up truck. Our evidence indicates that Ford Motor Company manufactured this vehicle and may be responsible for this loss. As such, this correspondence serves as a notice of a potential claim against Ford Motor Company arising from this fire loss.

Upon your receipt of this correspondence, please contact our cause and origin investigator, Mr. James Hall at (602) 315-9688 or (480) 860-1853, to arrange for an opportunity for Ford Motor Company to conduct a fire scene origin and cause examination in this matter. In order to avoid further damage to the fire scene, we must conduct the scene examination as soon as possible. Unless we hear from you on or before April 5, 2004, we will proceed with the fire scene examination and proceed with the demolition of the fire scene. If we do not hear from you on or before April 5, 2004, we will reasonably presume that Ford Motor Company does not wish to be involved in the examination of the fire scene, and we will go forward with our investigation into the cause of this loss.

Ford Motor Company
March 26, 2004
Page 2

Upon your receipt of this correspondence, please contact me to discuss the foregoing.
We look forward to hearing from you soon. Thank you.

Sincerely,

COZEN O'CONNOR

Blanca Quintero

By: Blanca Quintero

BQ:wb

cc: Shawn L. Norton (Via Overnight Mail)
Claim Analyst/Corporation Legal Assistant
Ford Motor Company
Parklane Towers West, Suite 300
Three Parklane Boulevard
Dearborn, MI 48126-2568

SDNEGO12349891 149831.000

EN05-003-1.C1-2200



State Farm Insurance Companies

October 12, 2000

*State Farm
will not
prove subrogation
basis on their
Investigation
11/16/00
Close file*

Ford Motor Company
Suite 400
Parklane Towers West
Three Park Lane Boulevard
Dearborn, MI 48126-2568



Spartanburg Claim Office
200 Westgate Mall Drive
P. O. Box 2647 (29304-2547)
Spartanburg, SC 29304-1305
(803) 583-1800



CERTIFIED MAIL--RETURN RECEIPT REQUESTED

Re: Claim Number: [REDACTED]
Our Insured: [REDACTED]
Date of Loss: June 10, 2000
Make/Model/Year of Vehicle: 1995 Ford F150 Pickup
Serial Number: 1FTEX15N6S [REDACTED]

Dear Sir/Madam:

On July 26, 2000, we sent a letter to you advising that the above-referenced vehicle was involved in a fire loss on July 10, 2000. We settled the claim with our insured in the amount of \$12,875.00, which includes our insured's deductible of \$500.00. Our investigation reveals the cause of this loss was due to an engine compartment fire.

In that letter, we advised you the evidence was being held for your inspection. To date, we have not heard from you. The vehicle is located at SADISCO. Their phone number is [REDACTED]. Their file number is [REDACTED]. Please contact them as soon as possible for inspection of this vehicle. If you do not send someone to inspect the vehicle, we will proceed with getting an independent to inspect the vehicle and forward a copy of the report to you at your expense.

5905-005-1-01-2781

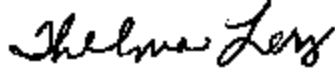
HOME OFFICE: BLOOMINGTON, ILLINOIS 61710-8001

PRODUCED BY FORD

Ford Motor Company
Page 2
October 12, 2000

Please consider this letter as our demand to forward Company for reimbursement of \$12,875.00.

Sincerely,



Thelma Long
Claim Specialist
State Farm Mutual Automobile Insurance Company
(864) 587-4631

TL/042/1012006

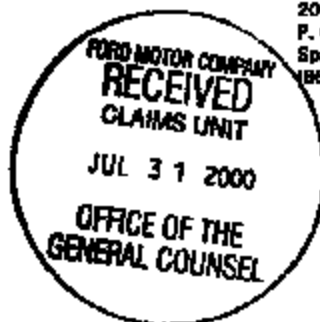
State Farm Insurance Companies

July 26, 2000



Spartanburg Claim Office
200 Westgate Mall Drive
P. O. Box 2647 (29304-2647)
Spartanburg, SC 29301-1305
(864) 587-4800

Ford Motor Company
Parklane Towers West, Suite 400
3 Parklane Boulevard
Dearborn, MI 48126-2568



Re: Claim Number: [REDACTED]
Our Insured: [REDACTED]
Date of Loss: July 10, 2000
Make, Model &: 1995 Ford F150 pickup
Year of Vehicle
Serial Number: 1FTEX15N6SK [REDACTED]

Dear Sir/Madam:

This State Farm insured's 1995 Ford F150 pickup was involved in a fire loss on July 10, 2000. We settled a claim with our insured in the amount of \$12,875.00, which includes our insured's deductible of \$500.00. Our investigation revealed the cause of this loss was due to an engine compartment fire.

Enclosed is the documentation of State Farm's claim. The evidence is being held for your inspection. You may contact me at (864) 587-4631 to make arrangements to inspect the vehicle.

Please consider this letter as our demand to Ford Motor Company for reimbursement of \$12,875.00.

Sincerely,

A handwritten signature in cursive script that reads "Thelma Long".

Thelma Long
Claim Specialist
State Farm Mutual Automobile Insurance Company
(864) 587-4631

TL/025/0726007

Preliminary Valuation Report

State Farm Insurance

109 Interstate Blvd., Anderson SC 29622

Date: 7/18/00	Valuation ID: 40-2408-58901
Claim: [REDACTED]	Type of Loss: M
Policy: [REDACTED]	Classification: Total Loss
Customer: [REDACTED]	Assessor: TAUNYA MCCOMBS
Loss Date: 7/10/00	Assessor ID: 51637
Deductible: \$500	Profile: ANDERSON
Payer Code:	State:

Vehicle: 1995 Ford Pickup F150 XL 2D PkUpXCh 7' Bed 139" WB 5.0L Inj 8 Cyl	Type: Truck
VIN: 1FTEK15N6S	License: 856 GEH SC
Mileage: [REDACTED]	Color: SILVER/PURPLE MET
Condition:	

N.A.D.A.® SOUTHEASTERN VALUES

F150 PICKUP-V8 STYLE SPRCAS XL 63/4'

Base Value	\$11,800
Mileage Adjustment	Unspecified
Air Conditioning	Standard
Power Brakes	Standard
Power Windows	Standard
Power Door Locks	Standard
Tilt Steering Wheel	Standard
Cruise Control	Standard
Without Electric Defogger	No Adjust
AM-FM Stereo	Standard
Without Leather Seats	No Adjust
Automatic Transmission	Standard
Running Boards	\$100
Bed Liner	\$75
XLT Trim	\$500

Total Retail Value	\$12,375
--------------------	----------

Mitchell International, a Division of Thomson Publishing Corporation warrants that this valuation is an accurate representation of the N.A.D.A.® value guide.

AVERAGE VEHICLE VALUE	\$12,375.00
Taxable Adjustments	
Taxable Adjustments Total	\$0.00
Pre-Tax Subtotal	\$12,375.00
Post-Tax Subtotal	\$12,375.00
Non-Taxable Adjustments	
Deductible	<\$500.00>
Non-Taxable Adjustments Total	<\$500.00>
NET TOTAL	\$12,075.00

Customer: [REDACTED]	Inspection Site: RESIDENTS
: [REDACTED]	: 111 RAMSEY DR
: [REDACTED] SC	: GREENWOOD, SC 29646

Impact Points: Non-Collision

Copyright © 1994-2000, Mitchell International. All Rights Reserved.

Photo for: 40-2408-559



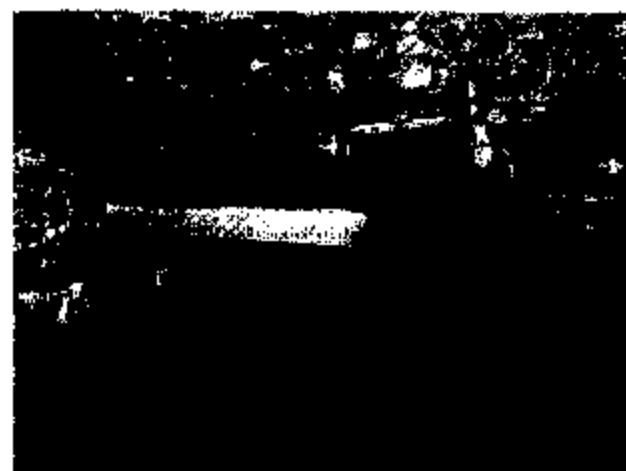
INTERIOR



LT FRT



RT FRT



RT REAR

40-2408-101-2205



INTERIOR - DASH AREA



ENGINE COMP AT DASH AREA



ENGINE COMP



INTERIOR

Photo for: 40-2406-569



LT REAR & ID

EROS-000-101-2287

SFCHMCMA

Action Detail

09/13/00 15:47:45

-->

VIN: 1F35015768K Year: 1995 Model: F-SERIES
Name: [REDACTED]
Trmt: [REDACTED] Contact: 105391787
Symptom: 301000
Reason: 02
Dealer: F21212 TOWN & COUNTRY FORD INC
Issue Type: 6 INFO Issue Status: 2 CLOSED
Comm Type: P PHONE Odometer Reading: 007600 MI
Analyst: 7649NC COOK Document Number:
Action Date: 04/10/95 Action Data: N
Action Time: 11:33:44 EST
Origin Desc: GO
Action Desc:

Comments:

CUSTOMER SAYS:

-WHEN APPLYING THE BRAKES THE FRONT END VIBRATES.

DEALER SAYS, PER CUSTOMER:

-THE DEALER HAS BEEN HELPFUL.

- A TSB HAS BEEN ISSUED YET, FORD WILL NOT REPAIR UNDER TH

E TSB AS THIS

F1=Help F2=ActionData F4=PrevAction F5=NextAction F9=PrevComments
F10=NextComments F11=Menu F12=Return F13=PrevContact F14=NextContact
MORE COMMENTS AVAILABLE OGDB079

E900-000-151-2290

SFCHMCMA

Action Detail

09/13/00 15:47:52

-->

VIN: 1F07715M56 Year: 1995 Model: F-SERIES

Name:

Trmt:

Contact: 105391787

Symptom: 301000

Reason: 02

Dealer: F21212 TOWN & COUNTRY FORD INC

Issue Type: 6

INFO

Issue Status: 2 CLOSED

Comm Type: P

PHONE

Odometer Reading: 007600 MI

Analyst: 7649NC

COOK

Document Number:

Action Date: 04/10/95

Action Data: N

Action Time: 11:33:44 EST

Origin Desc: GO

Action Desc:

Comments:

E TSB AS THIS

-ONLY WORSENS THE CONCERN.

CUSTOMER SEEKS:

-TO KNOW IF ANY ADDITIONAL INFORMATION HAS BEEN PROVIDED.

CAC ADVISED:

-NO UPDATES HAVE BEEN PROVIDED.

F1=Help

F2=ActionData F4=PrevAction F5=NextAction F9=PrevComments

F10=NextComments F11=Menu

F12=Return

F13=PrevContact F14=NextContact

MORE COMMENTS AVAILABLE

OGDB079

E985-005-101-2289

SFCHMCMA

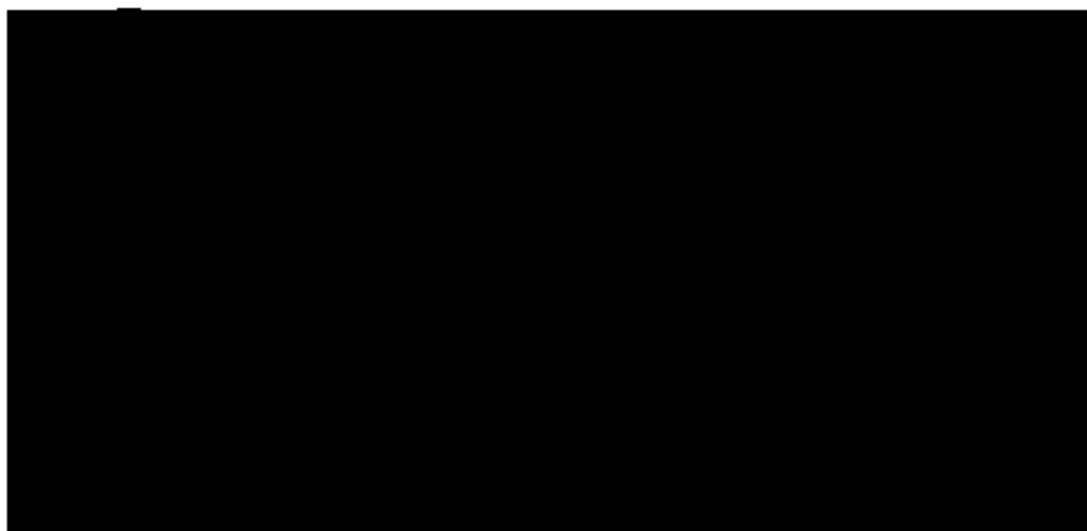
Action Detail

09/13/00 15:47:56

→
VIN: 1F8015K55E Year: 1995 Model: F-SERIES
Name: [REDACTED]
Trmt: [REDACTED] Contact: 105391787
Symptom: 301000
Reason: 02
Dealer: F21212 TOWN & COUNTRY FORD INC
Issue Type: 6 INFO Issue Status: 2 CLOSED
Comm Type: P PHONE Odometer Reading: 007600 MI
Analyst: 7649NC COOK Document Number:
Action Date: 04/10/95 Action Data: N
Action Time: 11:33:44 EST
Origin Desc: GO
Action Desc:
Comments: -NO UPDATES HAVE BEEN PROVIDED.
-CONTACT THE SM, MR ARMSTRONG FOR ANY UPDATES AS THEY BECO
ME AVAILABLE.

F1=Help F2=ActionData F4=PrevAction F5=NextAction F9=PrevComments
F10=NextComments F11=Menu F12=Return F13=PrevContact F14=NextContact
NO MORE COMMENTS AVAILABLE OGDB079

F001-000-1C1-2200



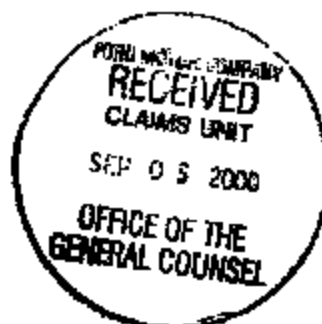
State Farm Insurance Companies



August 30, 2000

Claim Office
5930 Shingle Creek Parkway
Brooklyn Center, MN 55430-2387
Phone: (763) 688-4900

Ford Motor Company
Parklane Towers West, Ste. 400
3 Parklane Blvd.
Dearborn, MI 48126-2568



RE: Claim Number: [REDACTED]
Our Insured: [REDACTED]
Date of Loss: 8/23/00
Vehicle: 1996 Ford F-150 Pickup
VIN: 1FTEX14N8T [REDACTED]

Dear Ford Motor Company:

The identified 1996 Ford F-150 is insured by State Farm Mutual Automobile Insurance Company. This vehicle experienced an engine compartment fire.

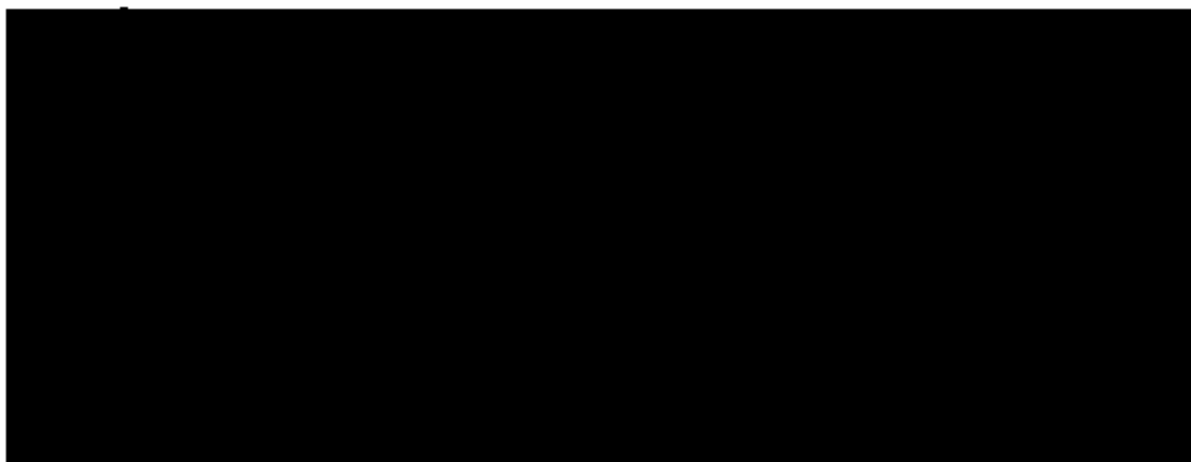
State Farm would like to give you an opportunity to inspect the 1996 Ford F-150 pickup and give you advanced notice of our potential subrogation claim.

Please contact me at 612-569-4937 to set up a time for your inspection.

Sincerely,


Steven L. Meyer
Claim Specialist
State Farm Mutual Automobile Insurance Company
(763) 569-4937

SM/013/0830013



State Farm Insurance Companies



P.O. Box 9813
Winter Haven, FL 33883-9813
(800) 301-7350

April 9, 2003

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



RE: Claim Number : [REDACTED]
Date of Loss : December 26, 2002
Our Insured : Felix Laquidara
Your Reference: 1998 Lincoln Navigator

Dear Sir or Madam:

The identified vehicle, 1998 Lincoln Navigator, vin. no. 5LMPU28L2WL [REDACTED] is insured by State Farm Mutual Insurance Company. This vehicle experienced an engine compartment fire which resulted in a total loss.

State Farm would like to give you an opportunity to inspect the vehicle and give you advance notice of our potential subrogation claim.

Please contact me to set up a time for your inspection.

Sincerely,

Bob McLane

Bob McLane X8553
Claim Representative
(800) 301-7350

State Farm Mutual Automobile Insurance Company

12/26/02
198 NAV
VIN

HOME OFFICES: BLOOMINGTON, ILLINOIS 61710-0001

ENR-005-101-2382

PRODUCED BY FORD

IN THE COUNTY COURT IN AND FOR COLLIER COUNTY, FLORIDA

CIVIL DIVISION

CASE NO. 04-1284-5P



Plaintiff,

vs.

COMPLAINT

FORD MOTOR COMPANY,

Florida Bar No. 221260

Defendant.

Plaintiff sues the Defendant, and alleges:

1. This is an action for damages within the jurisdictional limits of this Court.
2. On or about December 26, 2002, at or near [REDACTED] Bonita Springs, Collier County, Florida, Plaintiff's subrogor owned a 1998 Lincoln Navigator and a 1987 Chevrolet.
3. At the above time and place, Plaintiff's subrogor's Lincoln Navigator caught fire due to the improper and or negligent design and or engineering by Defendant, FORD MOTOR COMPANY, so as to allow Plaintiff's subrogor's Chevrolet to become damaged.
4. As a result of the negligence of said Defendant, Plaintiff's subrogor's 1987 Chevrolet, parked next to the Lincoln Navigator was damaged and depreciated in value and the value of its use was lost.
5. By reason of the incident alleged, STATE FARM MUTUAL AUTO INS. CO. became liable under a policy of comprehensive insurance issued to its subrogor to pay and at diverse times did pay to or for the benefit of its insured, the losses resulting in a total sum as claimed below. Plaintiff's insured has an uncompensated deductible in the amount of \$500.00, which STATE FARM MUTUAL AUTO INS. CO. claims as trustee of its insured.
6. By reason of the above payments and the above trust, Plaintiff, STATE FARM MUTUAL AUTO INS. CO., became subrogated to the rights of its insured against the Defendant.

WHEREFORE, Plaintiff demands Judgment in the sum of \$3,435.34, together with Court costs, pre-judgment interest if applicable, appropriate loss of use and diminution in value, and any further costs the Court may assess.

STEPHEN C. SHENKMAN & ASSOC., P.A.
Attorneys for Plaintiff
10121 S.W. 40th Street
Miami, FL 33165
Telephone: (305) 559-2700
Outside Dade: (305) 1-800-755-5485

BY: 
STEPHEN C. SHENKMAN

K1 Person/Entity Involved

Local Option

☐ Check this box if
this person is
involved in the
incident. Then check the appropriate
category below.

Mr., Mrs., Miss, Other

Name

Address

City

State

Zip Code

Phone

Other

☐ More people involved? Check this box and attach Supplemental Report (Form-18) as necessary

K2 Owner

☐ Same as person involved? Then check this box and state the year on this device.

Local Option

Vehicle Year (if applicable)

Year Code

Make

Model

☐ Check this box if
this person is
involved in the
incident. Then check the appropriate
category below.

Mr., Mrs., Miss, Other

Name

Address

City

State

Zip Code

Phone

Other

Equidura

2

Felix

27111

Flossmoor

DR

Seneca Springs

FL

34135

L Remarks

Local Option

B-226 & 5 responded to a vehicle fire on Flossmoor Dr. Arrived on scene and found a 1998 Lincoln Navigator fully involved. There was a 1987 Chevrolet Suburban parked in the driveway in front of the Lincoln. The fire was extinguished with a 1.5" hose line. The Lincoln was destroyed, the Chevrolet was moderately damaged by radiant heat. The fire was determined accidental. The owner advised that he went to the store at approx. 11 a.m. and returned with no problems. The owner also stated that he had no mechanical problems with the vehicle prior to the fire.

RECEIVED

SEP 03 2003

FIRE SUB UNIT

L Authorization

Signature

Signature

11

Signature

Signature

12

26

2002

Check box if
this person is
involved in the
incident. Then check the appropriate
category below.

Signature

Signature

09

Signature

Signature

12

26

2002

Seneca Springs Fire Control & Service Division

CAO

LEAD EMT VILCOG

1501 206 603 342 32-AT 2002/02/00

2005-005-101-2305

REF-2 Rev 1.1 01/20/99

18042		12 26 2002		02-0004133		000		NFIRS - 3 Apparatus or Resources	
Apparatus or Resource		Date and Time				Sent		Use	
		Month Day Year Hour Min				[X]		Check all that apply and append to indicate the unit was at the incident.	
1	ID 226 Type 11	Dispatch	12	26	2002	13:58	[X]	[X]	Suppression [X] Rescue [X] Other [X]
2	ID 355 Type 82	Dispatch	12	26	2002	13:58	[X]	[X]	Suppression [X] Rescue [X] Other [X]
3	ID Type	Dispatch							Suppression [X] Rescue [X] Other [X]
4	ID Type	Dispatch							Suppression [X] Rescue [X] Other [X]
5	ID Type	Dispatch							Suppression [X] Rescue [X] Other [X]
6	ID Type	Dispatch							Suppression [X] Rescue [X] Other [X]
7	ID Type	Dispatch							Suppression [X] Rescue [X] Other [X]
8	ID Type	Dispatch							Suppression [X] Rescue [X] Other [X]
9	ID Type	Dispatch							Suppression [X] Rescue [X] Other [X]

Type of Apparatus or Resources

Ground Fire Suppression

11 Engine

12 Truck or aerial

13 Quilt

14 Tanker & pump combination

15 Tank truck

17 AWP (Aircraft Water and Firefighting)

18 Ground fire suppression, other

Heavy Ground equipment

21 Dumper or plow

22 Tractor

24 Tanker or tender

28 Heavy equipment, other

Aircraft

41 Aircraft: fixed wing tanker

42 Helicopter

43 Helicopter

44 Aircraft: other

Marine Equipment

51 Fire boat with pump

52 Boat, no pump

58 Marine apparatus, other

Support Equipment

61 Breathing apparatus support

62 Light and air unit

68 Support apparatus, other

Medical & Rescue

71 Rescue unit

72 Urban search & rescue unit

73 High angle rescue unit

75 H&M unit

76 H&M unit

78 Medical and rescue unit, other

Other Apparatus

Use Additional Sheets

Other

91 Mobile command post

92 Chief officer car

93 Exhaust unit

94 Type 1 hand saw

95 Type 2 hand saw

99 Privately owned vehicle

99 Other apparatus/resources

99 None

99 Undetermined

NFIRS-3 Revision 11/17/98

North Springs Fire Control & Alarm Division

0000

NOV 14 2002

18042 12/26/2002 02-0004133

02/14/2003 10:22 FAX 226 002 1802

0005-005-1C1-2387

State Farm Insurance Companies



PO Box 9609
Winter Haven, FL 33883-9609

November 6, 2003

Ford Motors
3 Parklane Blvd
Parklane Towers W Ste 300
Dearborn, MI 48126-2568

RE: Claim Number: [REDACTED]
Date of Loss: December 26, 2002
Our Insured: [REDACTED]
Total Amount of Loss: \$3,435.34
Our Payment: \$2,935.34
Insured's Payment: \$500.00

Your File Number:
Your Insured: [REDACTED]
P.O. BOX 3111
Tampa, FL 33631-3111

SUBROGATION CLAIM

We have been informed that you are the insurance carrier for the party designated as your insured in the caption of this letter.

Our investigation establishes that your insured was responsible for the damage to our policyholder's property as a result of the accident on the date indicated.

Please accept this letter as a notice of our subrogation rights and communicate with us in regard to your position on the matter.

Sincerely,

Team 32
FL Central Subrogation
(800) 627-4028

State Farm Mutual Automobile Insurance Company

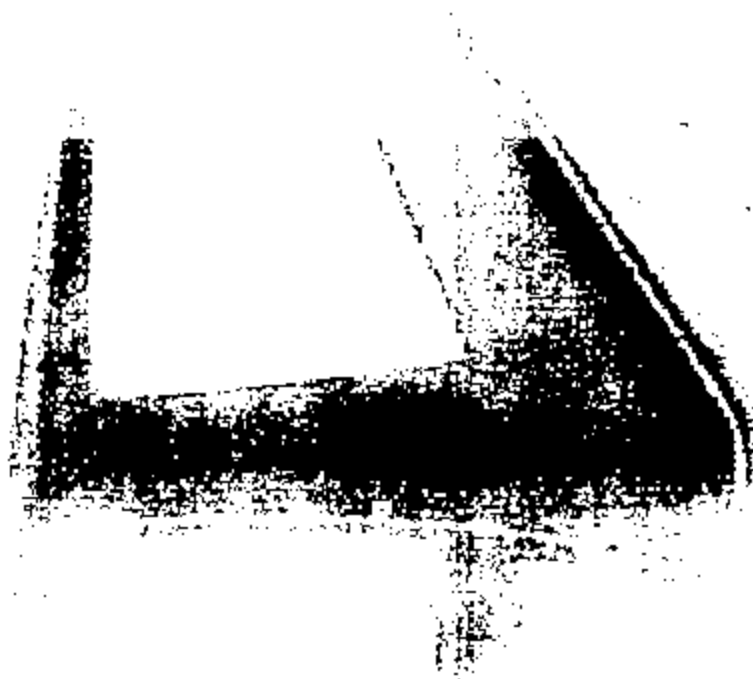
kmc
2604

HOME OFFICE: BLOOMINGTON, ILLINOIS 61710-0001

ERG-605-LC1-2389



2005-005-LC1-2308



BP00-000-L01-2011

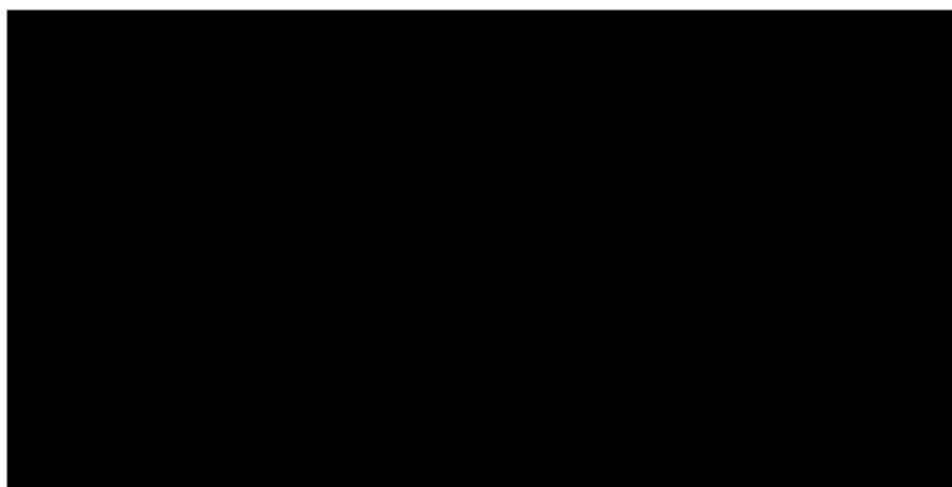
12.30.2002



2005-08-10-101-2312

FMNS-000-LC1-2313

7-30



UNITRIN

SPECIALTY LINES INSURANCE

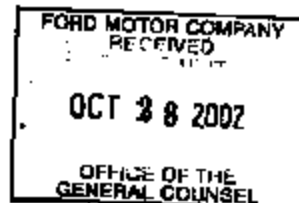
October 23, 2002

CONSUMER AFFAIRS
SECTION

Ford Motor Company
P.O. Box 6248
Dearborn, MI 48126
Attention: Claim Dept.

2 OCT 29 AM 11:51

RE: Your Insured : Ford Motor Company
Your Claim Number : Unknown
Our Insured :
Our Claim Number :
Date of Loss : 03-01-2002
Damages : \$19,374.19
Salvage : Pending
Deductible : \$ 489.00
Total Demand : Pending



To Whom It May Concern:

We have been notified that you are the liability carrier for the person who is responsible for this accident. The damages paid in the accident are shown above. We have also attached documentation to support our claim.

Since your insured was the proximate cause of this accident, we are hereby requesting reimbursement of the damages. Our investigation shows the fire damage to our insured vehicle was caused by a resistive type electric short that occurred within the multi-wire electrical wiring connectors. Please make your check or draft payable to: Charter County Mutual Insurance as Subrogee for Rosaura Coronado. The payment should be for the "Total Demand" amount referenced above.

If you would like to discuss this claim contact our office at 1-800-456-1919 ext. 2428.

We appreciate your consideration of this subrogation claim

Respectfully,

Rachelle Bowers
Rachelle Bowers
Subrogation Representative
Charter County Mutual Insurance Co.

3/1/02
\$ 19,873.19

ENR-905-101-2314

NO. 811589

[REDACTED]

Plaintiffs,

VS.

FORD MOTOR COMPANY,

Defendant,

§
§
§
§
§
§
§
§
§

IN THE COUNTY COURT

C.C.C.L. #2

AT LAW NUMBER 4-462

HARRIS COUNTY, TEXAS

PLAINTIFFS' ORIGINAL PETITION

TO THE HONORABLE JUDGE OF SAID COURT:

Come now [REDACTED] Plaintiffs in the above entitled and numbered cause, and file this their Original Petition complaining of FORD MOTOR COMPANY, Defendant herein, and for such cause of action would respectfully show the Court as follows:

I.

Discovery Control Plan

Discovery is intended to be conducted under Level 2 of Rule 190, Texas Rules of Civil Procedure.

II.

Parties

Plaintiffs are residents of Harris County, Texas.

Plaintiffs' Original Petition - Page 1

Defendant FORD MOTOR COMPANY ("Ford") is a corporation authorized to transact business in the State of Texas, and may be served with process by serving its registered agent, CT Corporation, at 350 North St. Paul, Dallas, Texas 75201.

III.

Jurisdiction; Venue

The Court has jurisdiction over the parties and the subject matter of this suit; venue is proper in Harris County, Texas, the county in which the incident occurred and the county in which the Plaintiffs reside.

IV.

Background Facts

This action arises out of a fire which occurred on March 1, 2002, in Harris County, Texas. Plaintiffs were at all material times involved herein, the owners of a 2001 Ford F-150 XLT extended cab pickup truck, bearing VIN #1FTZX17211N [REDACTED] which truck is the subject matter of this lawsuit ("the vehicle"). The vehicle which is the subject matter of this lawsuit was manufactured and sold by Defendant Ford Motor Company. Heretofore prior to March of 2002, the Plaintiffs, as consumers, purchased the 2001 pickup truck. The vehicle was in the same condition at the time of the fire as it was when it was originally manufactured and at the time it was purchased by the Plaintiff. On or about March 1, 2002,

an electrical fault occurred in the multi-wiring engine wiring harness connectors, causing the vehicle to catch on fire. The fire completely destroyed the vehicle, all to the Plaintiffs' damage as more particularly set out hereinafter.

V.

Negligence and Breach of Warranties

Plaintiff incorporates all of the allegations contained in paragraphs I through IV as fully as though set out herein.

Plaintiff would show that the Defendant Ford was negligent in designing the cruise control deactivation switch in that the switch was defective and would cause an electrical fault causing a fire, which negligence was the proximate cause of the occurrence and Plaintiff's damages. Defendant was negligent in manufacturing the cruise control deactivation switch as well.

Plaintiff would further show that Ford impliedly warranted that the cruise control switch was of merchantable quality, reasonably fit for the purposes intended, when, in fact said cruise control switch was not as warranted in that it malfunctioned, which breaches of warranty were proximate causes of the occurrence and Plaintiff's damages.

Plaintiff relied on these express and implied warranties and suffered the damages that occurred as a proximate result of the Defendant's breach of these warranties.

VI.

Strict Liability of Ford Motor Company

Plaintiffs would show that at all material times involved herein, the engine wiring was unreasonably dangerous in that its design permitted the electrical malfunction, which condition was a producing cause of the fire and Plaintiffs' damages.

Plaintiffs would show that the product in question, namely the 2001 Ford F-150 pickup truck was defective and unsafe for its intended purposes at the time it left the control of the Defendant manufacturer. In this connection, the automobile was defectively designed, defectively manufactured and unreasonably dangerous to Plaintiffs in that its design and manufacture permitted the electric short, such condition being a producing cause of the fire and of the resulting damages to the Plaintiffs. Accordingly, the Defendant is strictly liable pursuant to §402A, *Restatement of the Law of Torts 2nd*, and as adopted by the Supreme Court of Texas.

VII.

Damages

Plaintiffs would show that as a direct and proximate result of Defendant's negligence, breach of warranties and strict liability, their 2001 Ford F-150 pickup truck sustained damages in an amount exceeding the minimum jurisdictional limits of the Court. Such amount represents the difference in fair market value of Plaintiffs' truck immediately

before and immediately after the fire in Harris County, Texas, and the surrounding area. Such amount is also the reasonable and necessary, usual and customary cost of repair to restore Plaintiffs' vehicle to the condition it was in immediately before the fire in Harris County, Texas, and the surrounding area at the time.

VIII.

Attorney's Fees

Plaintiffs would further show that it has become necessary to employ the undersigned attorney to file this suit and prosecute this claim, and Plaintiffs are entitled to recover, in addition to their actual damages, reasonable and necessary attorney's fees in the amount of at least \$10,000.00 for one trial or hearing hereof, and an additional sum of \$5,000.00 if appealed to the Court of Appeals and the further sum of \$7,500.00 if an appeal or writ of certiorari is filed with the Supreme Court of Texas, all to Plaintiff's damage in such further amounts.

IX.

(Not to be Read to the Jury)

Plaintiffs would show that Charter County Mutual Insurance Company ("Charter") is entitled to this recovery against Defendant, and is the real party in interest, and is authorized to pursue this claim in the name of the Plaintiffs, and the Plaintiffs have subrogated their rights in this cause of action to Charter, to the extent of payment thereof.

WHEREFORE, PREMISES CONSIDERED Plaintiffs pray that Defendant FORD MOTOR COMPANY be cited to appear and answer herein, and that upon final hearing hereof, Plaintiffs have and recover judgment against the Defendant for all of their damages, pre-judgment interest as allowed by law, interest on the judgment at the highest lawful rate, reasonable attorney's fees with conditional awards as alleged, all court costs, and for such other and further relief, general or special, at law or in equity, to which they may be justly entitled.

Respectfully submitted,

LAW OFFICE OF RICHARD ELLIOTT



Richard H. Elliott
P.O. Box 1515
Fredericksburg, Texas 78624
Telephone: (830) 997-7715
Facsimile: (830) 997-7013
Bar Card No. 06549500
ATTORNEY FOR PLAINTIFFS

SFCHADMA

Action Detail

04/02/02 08:17:34

==>
VIN: 1FTZX17211K Year: 2001 Model: F-SERIES
Owner Status: ORIGINAL WSD: 07/17/01
Name: Hm Ph: [REDACTED]
Trmt: VLC Case: 1663930912 Day Ph: [REDACTED]
Symptom Desc: FIRE/SMOKE VISIBLE FLAME PASSENGER AREA
Reason Desc: LEGAL - ACCIDENT / FIRE
Dealer: LONE STAR FORD
Issue Type: 07 LEGAL Issue Status: O OPEN
Comm Type: PH PHONE Odometer Reading: 8000 MI
Analyst: RPAUL REHANA PAUL Document Number:
Action Date: 04/01/02 Action Data: Y Action Time: 18:21:45 EST
Origin Desc: US CONCERN CASE BASE
Action Desc: ADVISE CUST INFORMATION WILL BE SENT TO CONSUMER AFFAIRS
Comments: CUSTOMER SAYS: - VEH CAUGHT ON FIRE * DATE OF FIRE, MARCH
01,2002 * FIRE ORIGINATED UNDER THE DASHBOARD ON THE PASSE
NGER SIDE OF THE VEH * CURRENT LOCATION OF VEH IS STORAGE
* FIRE REPORT WAS FILED W/ FIRE DEPARTMENT * FINDINGS BY FI
RE MARSHALL WAS FIRE WAS ELECTRICAL * NOT SURE OF FIRE REPO
RT #, REPORT WAS FILED IN HOUSTON TEXAS * CLAIM WAS FILED W

F1=Help F2=AddAction F4=PrevAction F5=NextAction F6=ActionData
F9=PrevComments F10=NextComments F11=Menu F12=Return F13=ESP
MORE COMMENTS AVAILABLE

LPREL331

4/2
injuries?



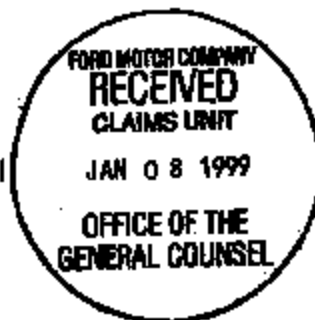
TravelersPropertyCasualty
A Member of TravelersGroup



Keep Close
P.O. Box 3022
Fall River, MA 02722-3022
800 925-7693
Fax: 508 324-8359

December 15, 1998

ATTN: CLAIM DEPARTMENT
FORD MOTOR COMPANY
POB 1904
DEARBORN, MI 481211904



CUSTOMER RELATIONS CENTER
1999 JAN -9 A 8 40

Re: Subrogation Claim
Our Insured: [REDACTED]
Our File No: [REDACTED]
Date of Loss: 10/20/98
Your Insured: Ford Motor Company
Your File No.: Unknown

Dear Sir/Madam,

We represent the insurance company for [REDACTED] who sustained a loss on 10/20/98. Our investigation of the incident shows that Ford Motor Company is allegedly responsible for our insured's loss.

We have paid our insured \$14,304.00 for this loss. We are requesting reimbursement for that amount and our insured's deductible of \$50.00 for a total of \$14,354.00.

Enclosed is proof of the damages. We expect repayment within 30 days. We will forward the deductible amount to our insured.

We appreciate your prompt attention.

Sincerely,

95-7150

Barbara R. Greene
508 324-8324

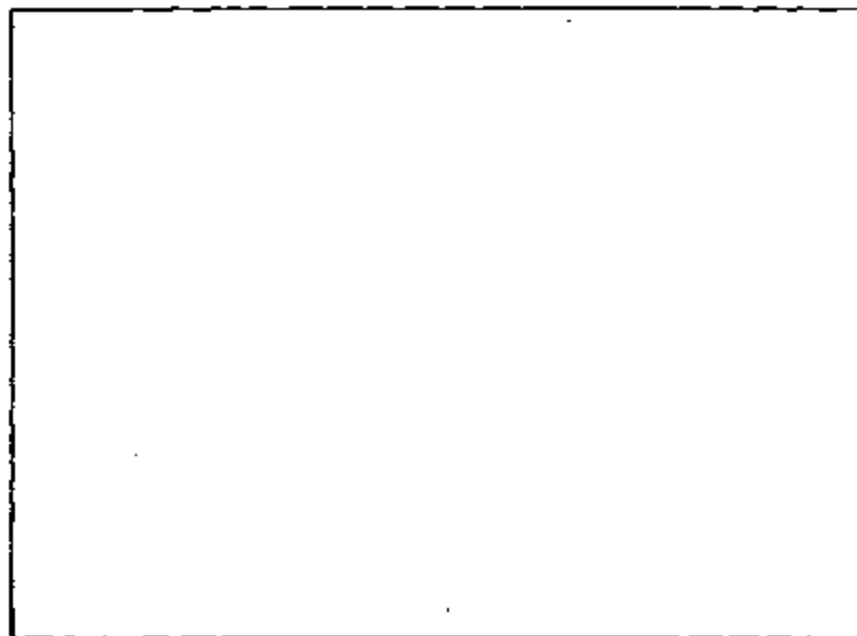
ER95-065-LC1-2322

PRODUCED BY FORD

DATE OF PHOTO: _____ DATE OF LOSS: _____
APPRaiser: _____ CLAIM NO: _____
INSURED: _____
CLIENT: _____ CLAIMANT: _____



COMME



COMMENTS (if required)

Photo Sheet

Claim #: S4W3831001



Scene 10



Scene 11

Photos Taken By:

Time Taken:

Date Taken:

Owner Name: MICHAEL COLLINS

Desc: 1995 FORD F-150

Location Photos Taken:

Insured Vehicle

Claimant Vehicle