

## All Action Details for Issue

Print

VIN: 1FTZX17251	Year: 2001	Model: F-SERIES	Case: 1702290755
Name:	Owner Status: Subsequent	WSD: 2001-05-11	
Symptom Desc: FIRE/SMOKE VISIBLE FLAME		Primary Phone:	
Reason Desc: LEGAL - ACCIDENT / FIRE		Secondary Phone:	
Issue Type: 10 OGC	Issue Status: CLOSED		

Action: CONTACT ADVANCED TO OGC

Dealer: 04822 GREENWAY FORD, INC.

Origin Desc: US CONCERN CASE BASE

Odometer: 72000 MI

Comm Type: PHONE

Analyst Name: BRAVEBOY PITTLIN

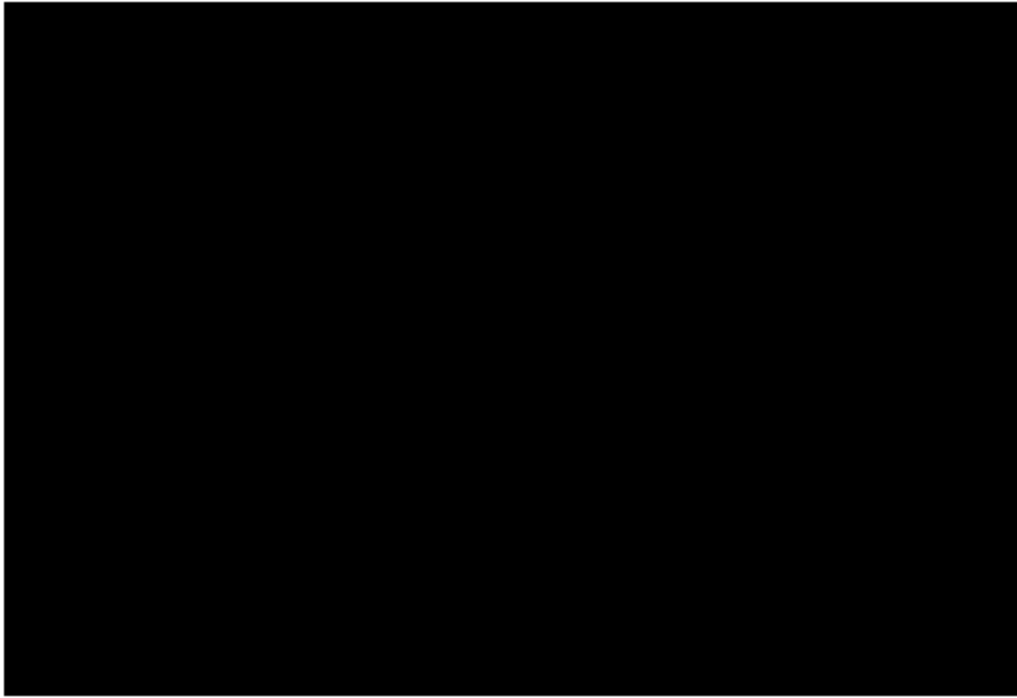
Analyst: PBRAVEB1

Action Date: 03/18/2005

Action Time: 19.30.28.223

Action Data: No

Comments CUSTOMER SAID: -CUST SAYS THAT HIS VEH CAUGHT ON FIRE ON SAT. MAR. 12TH, 2005 AND THERE WAS SOME DAMAGE DONE TO THE PARKING LOT WHERE THE VEH WAS-CUST IS CALLING TO BRING THIS TO FORD'S ATTENTION-CUST SAYS THAT HE IS AWARE THAT HIS VEH IS NOT PART OF THE RECALL-CUST SAYS THAT A REPORT WAS FILED WITH THE FIRE DEPT-NO OTHER CONCERNS-DEALER SAID: GREENWAY FORD INC 8001 EAST COLONIAL DRIVE ORLANDO, FL 32817-DISTANCE: 13.23 MILES TEL: (407) 275-3200-CRC ADVISED: I WILL FORWARD THIS INFORMATION TO THE FORD OGC DEPARTMENT. YOU WILL BE CONTACTED WITHIN 3-5 BUSINESS DAYS.



# State Farm Insurance Companies



February 16, 2005

State Farm Insurance  
Fire Centralized Subrogation  
P.O. Box 9606  
Winter Haven, FL 33883-0606

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

RECEIVED

FEB 23 2005

FEB 29 2005

RE: Claim Number: [REDACTED]  
Date of Loss: August 3, 2004  
Our Insured: [REDACTED]

Dear Sir:

This letter is to provide you with initial notice of a claim involving damage caused by a potentially defective product. The pertinent information is as follows:

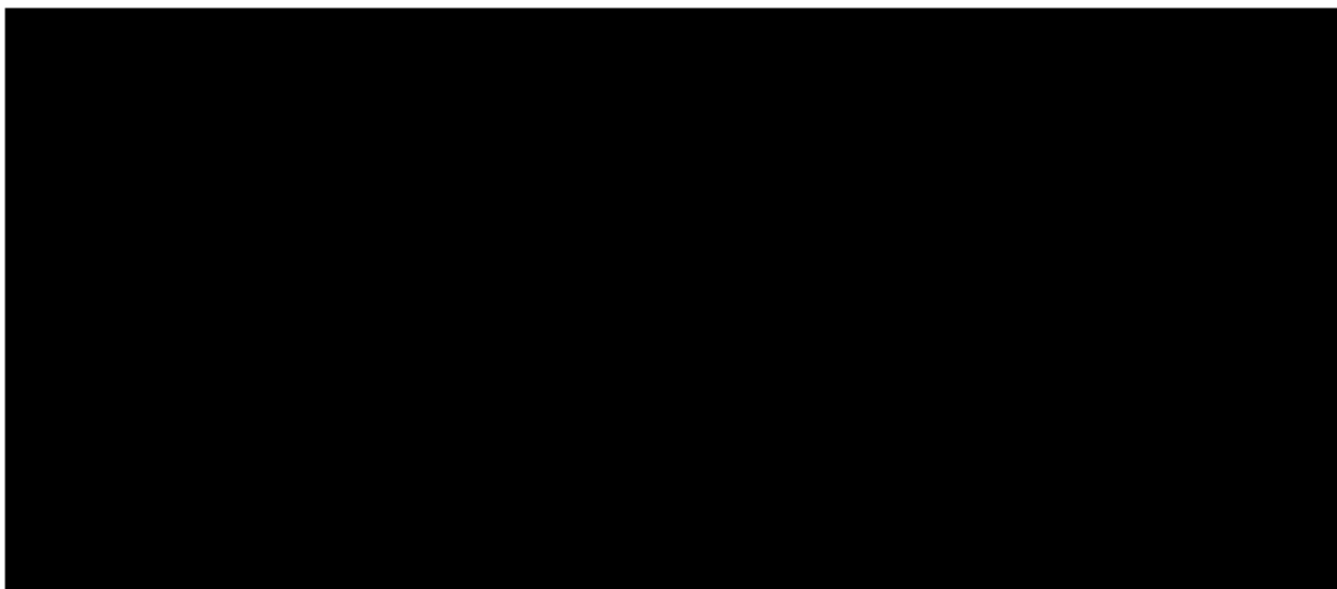
NATURE OF LOSS: Fire to dwelling from fire in vehicle  
DAMAGES ESTIMATED: \$3184.01  
PRODUCT TYPE: Ford F-150 truck 1997  
MODEL NUMBER: VIN 1FTDX1767V [REDACTED]  
SERIAL NUMBER:  
DATE OF PURCHASE: Unknown  
PRODUCT LOCATION: State Farm Insurance

Should you have any questions, please contact me at the number below, Monday through Friday 8:00 a.m. to 5:00 p.m.

Sincerely,

Cre Banks  
Claim Representative  
(888) 756-4449  
(888) 756-4449

State Farm Florida Insurance Company





FORD MOTOR COMPANY  
3 PARKLANE BLVD  
DEARBORN MI 48126-2506

March 10, 2005

OUR INSURED  
ADDRESS  
SENOIA, GA



CLAIM NUMBER  
LOSS DATE: November 06, 2004  
AMOUNT OF LOSS: \$9710.4

Please accept this letter as notice of our intent to pursue our subrogation rights. Subrogation is an insurance carrier's right to recover payment from a party, other than the named insured, that is responsible for causing the loss.

Our investigation has determined that on the above date our insured's property sustained damage as result of a defective product manufactured and/or sold by your company. Please review the information below and report this claim to your insurance carrier, unless you are self-insured.

**PRODUCT FAILURE/ LOSS DESCRIPTION:** 1997 Ford F150 caught on fire damaging our insured's driveway and property

To assist you in processing your claim, we have included the information as indicated.

- Damage Estimate Checks

Upon review of the attached information, please forward payment for the above loss amount to: Allstate Payment Processing Center, P.O. Box 227257, Dallas, TX 75222. Please include our claim number on your payment.

Thank you for your cooperation and immediate attention to this request.

Sincerely,

*Penny Divers*

Penny Divers  
800-776-2615 Ext.835  
Allstate Property and Casualty Insurance Company

EQ05-005-101-2724

SUBP005

1484701089 F2U



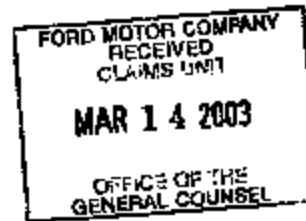
# State Farm Insurance Companies



P.O. BOX 9815  
WINTER HAVEN, FLORIDA 33883  
(866) 713-2335

March 11, 2003

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



RE: Claim Number : [REDACTED]  
Date of Loss : March 7, 2003  
Our Insured : [REDACTED]  
Your Reference: VIN: 5LMRU27L1WL [REDACTED]

Dear Sir/Madam:

The identified vehicle is insured by State Farm Mutual Automobile Insurance Company. This vehicle experienced a fire.

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 the undersigned to set up a time for your inspection.

Sincerely,

*Kathy Camps/nc/kl*  
Kathy Camps X466  
Claim Representative  
(866) 713-2335

State Farm Mutual Automobile Insurance Company





**COZEN AND O'CONNOR**

A PROFESSIONAL CORPORATION

THE ATRIUM

1800 MARKET STREET

PHILADELPHIA, PA 19103

(215) 565-2000

(800) 523-1800

FACSIMILE

(215) 565-2013

WWW.COZEN.COM

ATLANTA, GA  
CHARLOTTE, NC  
DALLAS, TX  
LONDON, UK  
LOS ANGELES, CA  
NEW YORK, NY

NEWARK, NJ  
SAN DIEGO, CA  
SEATTLE, WA  
WEST CONSHOHOCKEN, PA  
WESTMONT, NJ  
WILMINGTON, DE

DOUGLAS S. FOX  
DIRECT DIAL (215) 565-2017  
DIRECT FAX (215) 701-2017  
E-MAIL: DFOX@COZEN.COM

December 22, 1999

**VIA FACSIMILE AND FIRST CLASS MAIL**

Ford Motor Company  
300 Renaissance Center  
Detroit, MI 48243

Attn: Legal Department

Re: Our Insured: [REDACTED]  
Our Client: [REDACTED]  
Date of Loss: 12/11/99  
Our File No: Not Yet Assigned

Dear Sir or Madam:

We represent [REDACTED] the property insurer of [REDACTED]  
[REDACTED] who reside at [REDACTED] Orland Park, Illinois [REDACTED]

The home and property of [REDACTED] sustained substantial damage during a fire on December 11, 1999. Although the investigation is continuing, it appears that 1999 Lincoln Navigator may have caused the fire. A 2000 Cadillac DeVille was also in the garage. Both automobiles were removed from the insured's garage by the fire department during fire fighting operations, but are still in the insured's driveway.

If you wish to inspect these automobiles at their current location or the damage sustained during the fire, you must contact the undersigned by telecopy at the above number no later than 12:00 noon on December 24. If we do not hear from you by that time, we will assume that you have no interest in inspecting the automobiles at their current location, and we will have the

2005-005-LC1-2720

PRODUCED BY FORD

December 22, 1999

Page 2

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automobiles towed to a secure location (where they will be maintained for future examination), and the insured will be granted permission to begin clean-up in the area of fire origin.

Very truly yours,

COZEN AND O'CONNOR



BY: DOUGLAS B. FOX

DBF/k

cc: Ms. Sally Anderson - via facsimile and first class mail (Met Life Auto and Home)

EP03-005-LC1-2727



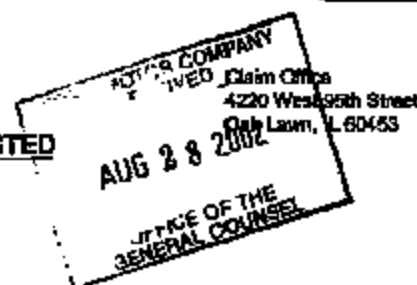
# State Farm Insurance Companies®



August 21, 2002

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

Ford Motor Companies  
Parklane Towers West  
Suite 403  
Parklane Boulevard  
Dearborn, MI 48126-2568



RE: Claim Number: [REDACTED]  
Our Insured: [REDACTED]  
Date of Loss: August 11, 2002  
Make, Model & Year of Product: Lincoln Navigator, 1998  
VIN: 5LMPU28L1W [REDACTED]

Dear Sir or Madam:

The identified Lincoln Navigator Sport Wagon is insured by State Farm Fire and Casualty Company. This 1998 Lincoln Navigator Sport Wagon experienced a fire.

State Farm® would like to give you an opportunity to inspect the 1998 Lincoln Navigator Sport Wagon and give you advance notice of our potential subrogation claim.

Please contact me at (708) 499-9322 to set up a time for your inspection.

Sincerely,

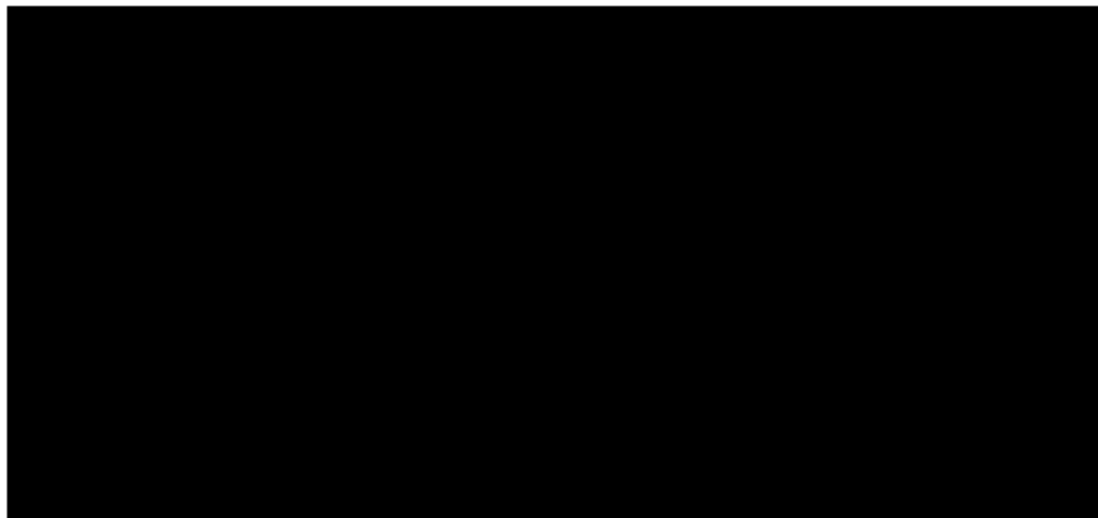
  
Kimberly Barney  
Claim Specialist  
(708) 499-9322

State Farm Mutual Automobile Insurance Company

KB/050/0821004

- 8/11/02  
- 198 Nav  
- VIN

ENR-005-L01-2728





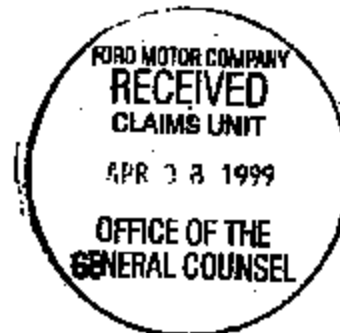
- Government Employees Insurance Company
- GEICO General Insurance Company
- GEICO Indemnity Company
- GEICO Casualty Company

Regional Office:  
750 Woodbury Road ■ Woodbury, NY 11797-2589

April 06, 1999

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

FORD MOTOR CORP  
OFFICE OF THE GENERAL COUNSEL  
PARKLANE TOWERS WEST #400  
30 PARKLANE BLVD  
DEARBORN MI 48126



RE: 1998 Lincoln Navigator  
VIN: [REDACTED]  
CLIAM: [REDACTED]  
INSURED: [REDACTED]  
LOSS DATE: February 27, 1999

To Whom It May Concern:

I represent Government Employees Insurance Company's Total Loss Unit. The above vehicle was involved in a fire of alleged unknown origin. The loss occurred in New York on February 27, 1999.

In order to determine the cause of the fire, including a determination as to whether any defect in the vehicle was in existence at the time of the loss, a representative of North Eastern Technical Services, Inc. will conduct an inspection and testing of the vehicle. The inspection will take place at Insurance Auto Auction, at 107 Peconic Avenue, Medford, NY 11763.

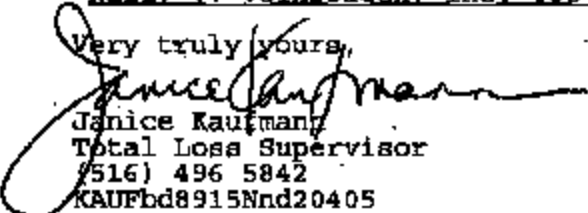
As the Ford Motor Corporation has an interest in the matter, from both a safety precaution standpoint and as a potential defendant in litigation, you are invited to have an expert attend and participate in the inspection and testing procedures.

To coordinate the inspection date and time, please contact North Eastern Technical Services, Inc. at (508) 675 0999 and refer to their reference number of 99-2230.

If you have any questions pertaining to this matter, you may contact the undersigned at 1 800 645 7550, Ext. 5842.

Please note that if you choose not to participate in the inspection, you will forfeit any right to subsequently claim prejudice under "Nally v. Volkswagen, Inc. 405 Mass 191 (1989)."

Very truly yours,

  
Janice Kaufman  
Total Loss Supervisor  
(516) 496 5842  
KAUFbd8915Nnd20405

EA05-025-LC1-2729

Shareholder Owned Companies Not Affiliated With The U.S. Government

PRODUCED BY FORD





Allstate Insurance Company  
1500 City West Suite 800  
Houston, TX 77042



Phone Number: 713-435-2600  
Office Hours: Monday-Friday 8:00-4:30

October 20, 2004

Ford Motor Company - General Counsel's Office  
3 Parklane Blvd, Ste PTW300  
Dearborn, MI 48126  
Attn: Shawn Norton

RECEIVED OCT 21 2004

RE: Our Claim Number: [REDACTED]  
Our Insured: [REDACTED]  
Date of Loss: 10/18/04  
Loss Site: 3 mile line & ¼ mile N. Moorfield, Mission TX 78572  
Loss Type: vehicle fire, damaged structure of home  
Vehicle Type: 2001 Ford Expedition, VIN 1FMRU17W811 [REDACTED]

Dear Ms. Norton:

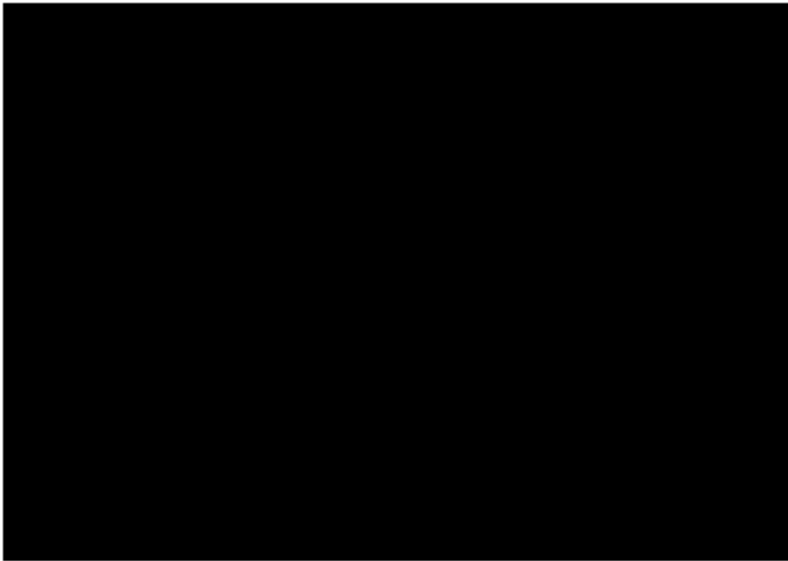
Please accept this letter as notice to your company of a claim for subrogation. Our policyholder sustained significant fire damage to his home that has been linked to the vehicle indicated above.

Currently, the vehicle is located at the loss site, which is in a rural area of southern Texas. We would like to have you arrange inspection in the immediate future so that the vehicle can be moved in order to facilitate repairs to the structure of the home. Dave Reiter of Verite Forensic Engineering will be inspecting the vehicle on our behalf.

Please contact me at 713-435-2751 to discuss this further. Thank you.

Sincerely,

Lisa W. Susman  
Senior Staff Claim Service Adjuster, Subrogation  
Allstate Property-Casualty Claim Service Organization



# Kemper

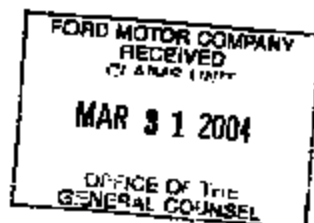
## Auto and Home

A UNITRIN Company

March 25, 2004

Ford Motor Company  
P.O. Box 1758 CA56  
Dearborn, MI 48126

OFFICE OF THE SECRETARY  
PETER J. ...



Re: Claim No.: [REDACTED]  
Insured: [REDACTED]  
Date of Loss: 1/3/04  
Loss Location: 2246 Vintage Place  
Hanford, CA 93230

### To Whom It May Concern:

We are the insurance carrier for the above named insured. Based upon our investigation and the conclusions of our cause and origin experts, it has been established that our insured suffered fire damage to their home and personal property when their 2001 Ford F-150 truck caught fire while the vehicle was parked in the garage at their residence.

By virtue of our subrogation rights, we seek reimbursement in the amount of \$53,445.23 which includes our insured's \$500.00 deductible. We have enclosed documentation to support our request for reimbursement for your review.

We have settled this claim with our insured and request payment be made directly to Kemper Independence Insurance Company.

Please contact Marcia Turner in our Subrogation Department at 1-800-822-8426, ext. 2556 between the hours of 7:30am and 4:00pm Monday through Friday.

Respectfully,

Kemper Independence Insurance Co.

*Lisa Klepen*  
Lisa Klepen  
Senior Claim Representative

### Enclosure

(916) 294-2600  
(800) 822-8426  
(916) 294-2600 Fax

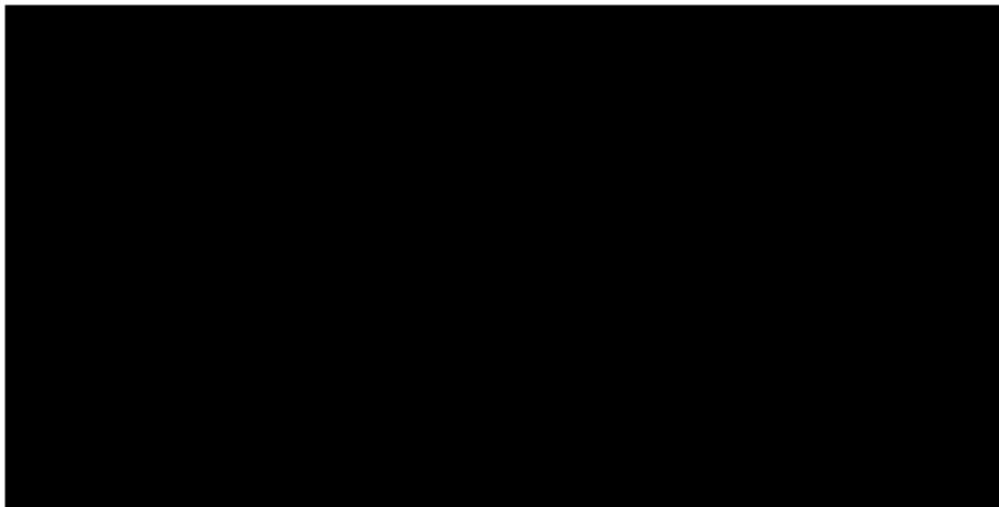
P.O. Box 6680  
Folsom, CA 95763-6680

[www.kemperautoandhome.com](http://www.kemperautoandhome.com)

- 101 F-150  
- 1/3/04  
- Hanford, CA  
- \$53,445.23

EA86-885-LC1-2731

CAH



# State Farm Insurance Companies®



February 18, 2005

State Farm Automobile Insurance Co.  
P.O. Box 6402  
Robert Park, CA 94827-6402

Ford Motor Co.  
Attn: Shawn Norton  
Parklane Tower West #300  
3 Parklane Blvd.  
Dearborn, Michigan 48126

FEB 25 2005

## CERTIFIED MAIL

Re: Claim Number: [REDACTED]  
Date of Loss: 08-19-04  
Our Insured: [REDACTED]  
Vehicle: 2001 Ford Expedition  
VIN #: 1FMEU17W811 [REDACTED]

Dear Sirs,

This State Farm insured vehicle was involved in an engine compartment fire. We settled a claim with our insured in the amount of \$734.15, which includes the insured's deductible.

Our investigation reveals the cause of the loss was due to a poor seal in the windshield that allowed water to come in contact with electrical components.

Enclosed is the documentation of State Farm's claim. We are holding the vehicle for 45 days in an attempt to conclude our claim with your company. You may contact me at (707) 588-6480 to make arrangements to inspect the vehicle.

Sincerely,

  
George Townsend  
Claims Representative  
(707) 588-6480  
State Farm Mutual Automobile Insurance Company

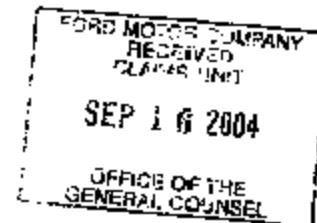
# State Farm Mutual Automobile Insurance Company



1919 South Bascom Avenue  
Suite 600  
Campbell, CA 95008

September 8, 2004

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



**VIA CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

Claim Number: 75-A866-452

Date of Loss: August 19, 2004

Insured: [REDACTED]


Vehicle: 2001 Ford Expedition

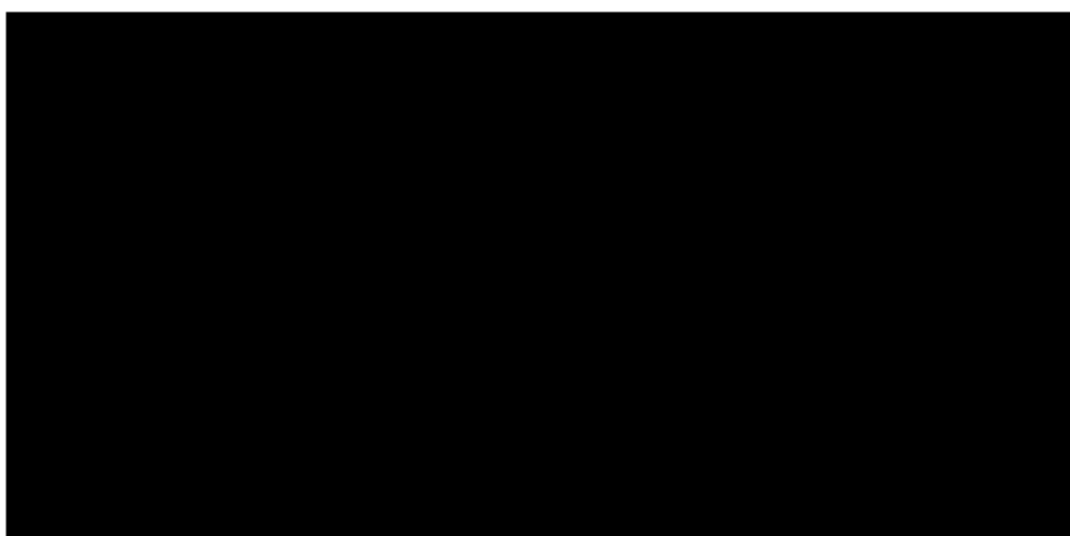
VIN #: 1FHEU17M81 [REDACTED]

Dear Gentle Person:

The identified vehicle is insured by State Farm Mutual Automobile Insurance Company. This vehicle was involved in a comprehensive loss. State Farm Insurance would like to give you an opportunity to inspect the vehicle or the damaged parts. In addition, we would like to give you advanced notice of potential subrogation. Please contact me at 650-224-9883 to set up a time for your inspection. We request that the inspection occur within 15 days from the date of this letter so we may move forward with the resolution of this matter.

Sincerely,

  
Ron Ritz  
Vehicle Investigation Program  
California Zone  
650-224-9883  
408-558-2919(fax)





**PRIVILEGED & CONFIDENTIAL**

Office of the General Counsel

Ford Motor Company  
Parklane Towers West  
Suite 300  
Three Parklane Boulevard  
Dearborn, Michigan 48124-2600

November 5, 2004

Travelers Insurance  
PO BOX 2954  
Milwaukee, WI 53201-2954  
ATTENTION: JON YESEY ✓

NOV 12 2004

Re: Claimant: [REDACTED]  
D/O/E: 10-13-2004  
Your Claim #: [REDACTED]

Dear Mr. Yeseey:

We acknowledge your recently submitted subrogation claim. In order to assist us in evaluating your claim, we request that you provide us with the following information: (Please note that the information requested is in regard to the Ford manufactured vehicle.)

- 1. Attach statement with a complete description of the incident, including events that occurred prior to and subsequent to the loss.
- 2. A copy of the police and/or fire report.
- 3. Original color photographs of the vehicle's collision/fire damage & the alleged defective parts, from several different angles.
- 4. Original color photographs of the inside of the vehicle showing the steering wheel, dash and roof areas.
- 5. Original color photographs of the accident / fire scene from several different angles.
- 6. Attach a copy of your expert's report and the expert's original photographs.
- 7. Attach the repair estimate, repair order, or your total loss worksheet for the vehicle's damage and any losses associated with this incident, and copies of draft payments.
- 8. Attach the complete service history for the subject vehicle, including any tune-ups or oil changes.

Please answer the following in the space provided. If you need additional space, please use the back of the form;

- 9. What was the city and state of occurrence: Monroe, LA
- 10. The 17 digit vehicle identification number: \_\_\_\_\_
- 11. What was the mileage at time of occurrence: \_\_\_\_\_
- 12. What is the alleged defect: \_\_\_\_\_



13. Has the alleged defective part been repaired or replaced? (circle one) Yes or No

14. What is the current location of the vehicle and the alleged defective part(s)?

[Redacted] out [Redacted] Mo is [Redacted]

15. List all after market additions or modifications that were made to the vehicle:

Auto in [Redacted] has Vehicle

16. Was the engine running? (circle one) Yes or No

17. Were the keys in the ignition? (circle one) Yes or No

18. Was this vehicle purchased new or used: \_\_\_\_\_

If purchased used, provide the date of purchase, mileage at the time of purchase, and from whom the vehicle was purchased: \_\_\_\_\_

Once we are in receipt of the requested information, it will be reviewed and you will be notified of our decision concerning your claim. Should you not send all of the requested information and materials, we will assume that you are not interested in pursuing a claim and we will close our file. Please note that your vehicle will not be inspected until all the above information has been submitted and a determination has been made as to whether an inspection is warranted.

Please be advised that all necessary steps should be taken to ensure that the subject vehicle and all of its component parts are maintained and preserved for trial. Ford Motor Company has the right to inspect the vehicle and remove and test any component part that you claim to be defective, and to be presented with the vehicle and the subject component part(s) at the time of trial, should litigation ensue from this informal claim.

Please Note: If you propose to repair the vehicle for continued usage, such repairs may not be performed until after Ford Motor Company has inspected the vehicle and removed and tested any component part you claim to be defective or advised you in writing that it does not intend to perform such inspection and/or testing at this time. But even in that event, Ford Motor Company will insist that all components claimed to be defective are maintained and preserved for trial.

Sincerely,

Shawn L. Norton  
Claims Analyst /  
Litigation Assistant

# TRAVELERS

TRAVELERS PROPERTY CASUALTY INSURANCE COMPANY  
JON VESEY  
PO BOX 7854  
MILWAUKEE WI 53201-2954  
(309) 854-4007 X 4781  
(262) 787-4781

CONSUMER AFFAIRS  
SECTION

RECEIVED NOV 1 9 2004

4 NOV -9 P2:43  
November 1, 2004

FORD MOTOR COMPANY  
CONSUMER AFFAIRES/LEGAL DEPARTMENT/CLAIMSDEPARTMENT  
16800 EXECUTIVE PLAZA DRIVE 3NE-B  
DEARBORN MI 48126-4207

NOV 09 2004



FORD MOTOR COMPANY  
RECEIVED  
CLAIMS DEPT  
NOV 11 2004  
OFFICE OF THE  
GENERAL COUNSEL

Our Client: [REDACTED]  
Claim/File #: [REDACTED]  
Date of Loss: 10/13/2004  
Reference: Subrogation Claim

Dear Ford Motor Company:

We are investigating a claim for [REDACTED] who sustained a loss on 10/13/2004.

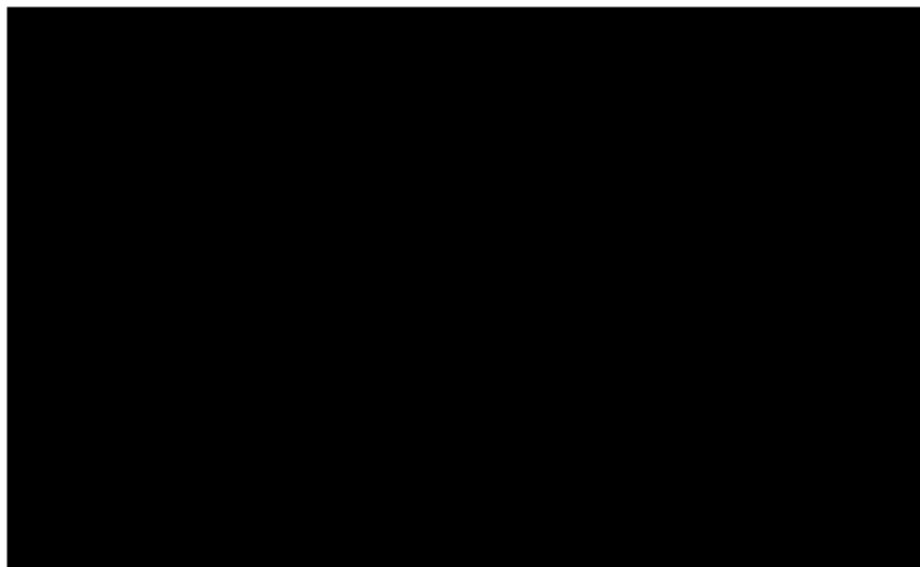
Our investigation reveals that you may be responsible for this loss. If you have insurance, please complete the attached form and return it to me. Please refer this letter to your insurance carrier immediately, requesting that they contact our office. Should you not have insurance, please contact me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

Please call me with any questions.

Sincerely,  
JON VESEY  
Claim Representative  
(262) 787-4781  
Fax: (866)280-7367  
Email:

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

Enclosure: Insurance Questionnaire



RECEIVED FEB 15 2005

Law Offices  
**GROTEFELD & DENENBERG, LLC**

8181 W. Broward Boulevard  
Suite 380  
Plantation, Florida 33324

Bingham Farms, Michigan  
Chicago, Illinois  
Plantation, Florida  
San Francisco, California

Donna Waters Romero  
Admitted in FL  
[dwr@gd-llc.com](mailto:dwr@gd-llc.com)

Telephone: (954) 916-4780  
Facsimile: (954) 916-4785

February 7, 2005

Via Facsimile 313/390-2107, U.S. Mail and Certified Mail RRR

Ms. Shawn L. Norton  
Corporate Legal Assistant  
Ford Motor Company  
Parklane Towers West, Ste. 300  
Three Parklane Blvd.  
Dearborn, MI 48126-2568

Re: *Allstate Insured:* [REDACTED]  
*Claim No.:* [REDACTED]  
*Date of Loss:* 12/08/2004  
*Our File No.:* 9.008112

Dear Ms. Norton:


Please be advised that our law firm has been retained to represent Allstate Insurance Company in connection with a fire that occurred at the home of its insured [REDACTED]. Our preliminary investigation reveals that the fire started as a result of a defect within a 2002 Ford F150.

If your company is insured for this loss please put your carrier on notice of this loss and have them contact us. If you are not insured, or are self-insured, please contact us to discuss this matter. If you or your insurer are interested in viewing the available remains, please contact us immediately to make those arrangements. If we do not hear from you or your agents within 48 hours after receipt of this letter, it will be presumed that you and your agents are not interested in viewing the remains and later objections that may arise will be waived.

Thank you for your immediate attention to this matter.

Very truly yours,

**GROTEFELD & DENENBERG, LLC.**

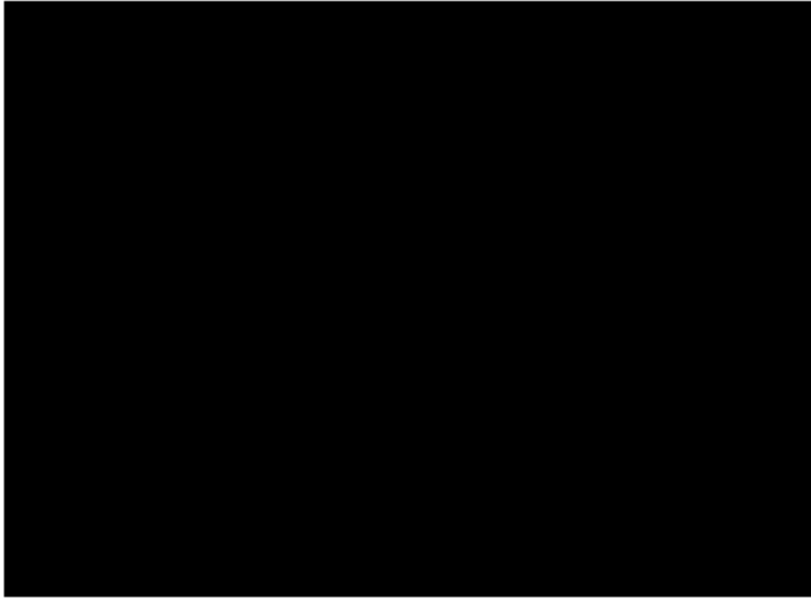
  
DONNA WATERS ROMERO  
For the Firm

DWR/jsh

cc: Cindy Haley DeGeorge (via email)  
Jim Phillips (via email)

#21493

ER05-005-LC1-2737



2005

LAW OFFICES OF

*DeCarlis & Sawyer*

(A Partnership of Professional Associations)

ATTORNEYS AT LAW

5000 NW 27<sup>TH</sup> COURT, SUITE G  
GAINESVILLE, FLORIDA 32606  
(352) 371-3638; (352) 373-7777; FAX (352) 378-3442

WILLIAM N. DeCARLIS  
J. MICHAEL SAWYER  
GILBERT J. ALBA  
CHRISTIAN A. STRAILE

SUNNY SHUPING, PLS  
OFFICE MANAGER

OCALA OFFICE:  
101 NW 3<sup>RD</sup> STREET  
OCALA, FL 34475  
(352) 366-2485

REPLY TO: GAINESVILLE OFFICE

February 11, 2005

**Via Facsimile (313-390-2107) & U.S. Mail**

Mrs. Shawn Norton  
Claims Analyst/Litigation Assistant  
Ford Motor Company  
Parklane Towers West  
Suite 300  
3 Parklane Blvd.  
Deerborne, MI 48126-2568

**Re: Property Damage and Personal Injury Claim for:  
Our Client/Claimant: [REDACTED]  
Date of Loss: 12-9-04**

Dear Mrs. Norton:

Please be advised that our office has been retained to represent [REDACTED] regarding the above-referenced loss. All future correspondence and communications regarding this matter should be directed to me at the above Gainesville address and telephone number. You will have the full cooperation of this office and will be supplied with information as it develops.

This letter serves as a revocation of any prior authorizations.

Pursuant to Florida Statute §627.4137, this letter is also a request for a statement under oath to be provided to this office within the next thirty days setting forth the following information with regard to each known policy of insurance, including excessive or umbrella insurance:

- (a) the name of the insurer;
- (b) the name of each insured;
- (c) the limits of the liability coverage;

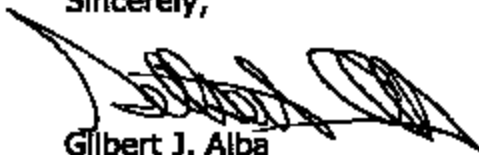
Mrs. Shawn Norton  
Ford Motor Company  
February 11, 2005  
Page 2 of 2

---

- (d) a statement of any policy or coverage defense which such Insurer reasonably believes is available to such Insurer at the time of filing such statement; and
- (e) a copy of the policy.

Thank you for your attention to this matter. Please feel free to contact me regarding any questions you may have.

Sincerely,



Gilbert J. Alba





IN THE CIRCUIT COURT OF THE 20th JUDICIAL  
CIRCUIT IN AND FOR COLLIER COUNTY, FLORIDA

GENERAL JURISDICTION DIVISION

CASE NO. 04-2874-CA

[REDACTED]  
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.
3. At the above time and place, the vehicle of Plaintiff's subrogor caught fire due to the improper and or negligent design and or engineering by Defendant, FORD MOTOR COMPANY.
4. As a result of the negligence of said Defendant, the vehicle of Plaintiff's subrogor 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 assignee of its insured.
6. By reason of the above payments and the above assignment, 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 \$25,648.35, 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. 40<sup>th</sup> Street  
Miami, FL 33165  
Telephone: (305) 559-2209  
Outside Dade: (305) 1-800-255-5485

BY: \_\_\_\_\_

STEPHEN C. SHENKMAN



IN THE CIRCUIT COURT OF THE STATE OF WEST VIRGINIA  
COUNTY OF GRANT

[REDACTED] CIVIL DIVISION

Plaintiff, NO.

vs.

FORD MOTOR COMPANY,

Defendant.

COMPLAINT

AND NOW comes the Plaintiff, [REDACTED] by and through his attorneys, DIBELLA & GEER, P.C., and JASON A. MITCHELL, ESQUIRE, and files the following Complaint, the following of which is a statement:

1. The Plaintiff [REDACTED] is an individual residing at [REDACTED], Oakland, Maryland [REDACTED].
2. At all times relevant and material hereto, the Plaintiff was the sole owner of a 2002 Ford F150 Pickup Truck with VIN 1FTRX18W22N [REDACTED].
3. The Defendant, FORD MOTOR COMPANY, is a corporation with its principal place of business at Parklane Towers West, Suite 400, Three Parklane Boulevard, Dearborn, Michigan, [REDACTED].
4. At all times relevant and material hereto, the Defendant, FORD MOTOR COMPANY, (hereinafter referred to as "FORD"), was in the business of designing, manufacturing, servicing and repairing vehicles such as the one Ford designed and manufactured and which was purchased by the Plaintiff, a 2002 Ford F150 Pickup Truck with VIN 1FTRX18W22N [REDACTED] (hereinafter referred to as the "vehicle.").

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

6. On or about May 12, 2002, while the Plaintiff was driving his vehicle in Bayard, West Virginia, the vehicle caught fire. At the time of the fire, the vehicle has approximately 3,000 miles on it. The fire caused substantial damage to the Plaintiff's vehicle totaling \$24,020.50.

**COUNT I**  
**BREACH OF IMPLIED WARRANTY**  
**OF FITNESS AND MERCHANTABILITY**

7. Paragraphs 1 through 6, inclusive, of this Complaint are incorporated herein by reference as though set forth at length herein.

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

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

WHEREFORE, Plaintiff, [REDACTED] requests damages against the Defendant, FORD, in the amount of \$24,320.50.

**COUNT II**  
**NEGIGENCE**

10. Paragraphs 1 through 9, inclusive, of this Complaint are incorporated herein by reference as though set forth at length herein.

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

- a. In negligently and/or improperly designing, manufacturing, supplying, distributing or selling the vehicle which was purchased by the Plaintiffs;
- b. In failing to properly inspect the vehicle and certify it as safe for its intended use;
- c. In failing to warn the Plaintiffs of the deficiencies and inadequacies of the vehicle;
- d. In failing to provide the vehicle with the proper mechanisms and/or safe guards necessary for the prevention of the incident that occurred;
- e. In manufacturing the vehicle with malfunctioning or defective parts which created a hazardous and dangerous condition to the Plaintiff's property; and,
- f. In creating a hazardous and dangerous condition with the vehicle's electrical or mechanical systems which caused the incident that occurred on May 12, 2002.

12. As a result of the negligence of the Defendant, FORD, the Plaintiff's property was damaged in the amount of \$24,020.50.

WHEREFORE, Plaintiff, [REDACTED], requests damages against the Defendant, FORD, in the amount of \$24,020.50.

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

13. Paragraphs 1 through 12, inclusive, of this Complaint are incorporated herein by reference as though set forth at length herein.

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


15. The unreasonably dangerous and defective condition as set forth above caused the vehicle to malfunction and caused the damage that occurred on May 12, 2002.

16. The aforesaid unreasonably dangerous and defective vehicle was the direct and proximate cause of the real and personal property of the Plaintiff in the amount of \$24,020.50.

WHEREFORE, Plaintiff, [REDACTED] requests damages against the Defendant, FORD, in the amount of \$24,020.50.

Respectfully submitted,  
DIBELLA & GEER, P.C.

BY:

  
\_\_\_\_\_  
JASON W. MITCHELL, ESQUIRE  
Attorney for Plaintiff,  
ROGER D. PANNELL  
W.VA ID NO. 2101

DIBELLA & GEER, P.C.  
312 Boulevard of the Allies  
Pittsburgh, PA 15222

(412) 261-2900  
FAX: (412) 261-3222

IN THE CIRCUIT COURT OF THE STATE OF WEST VIRGINIA  
COUNTY OF GRANT

[REDACTED]

CIVIL DIVISION

Plaintiff,

NO.

vs.

FORD MOTOR COMPANY,

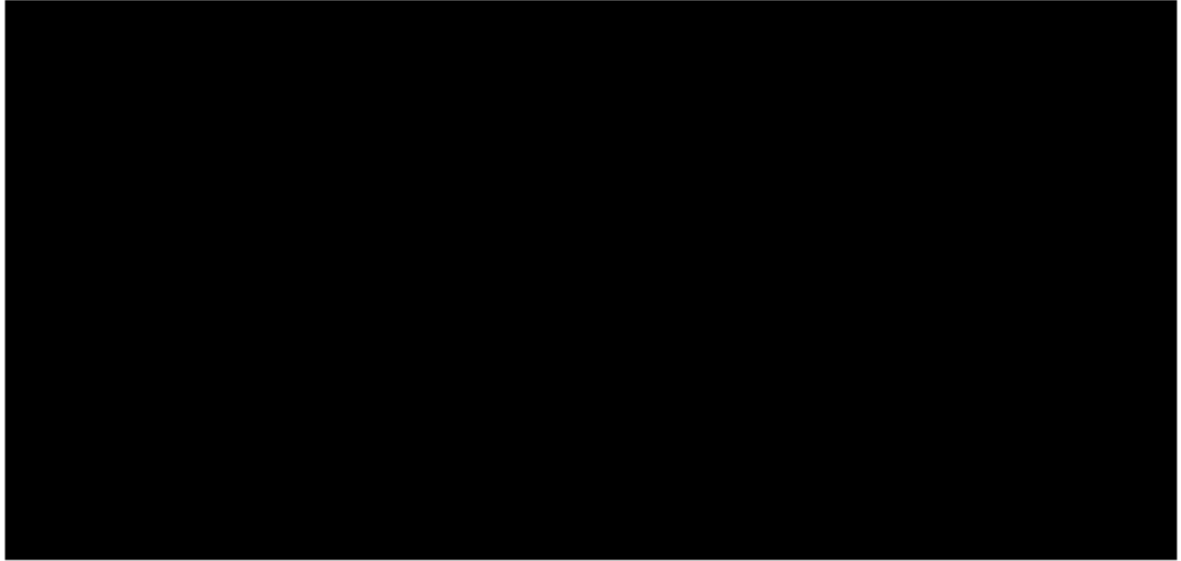
Defendant.

VERIFICATION

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

B [REDACTED]

DATE: 7/19 003





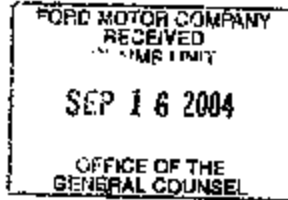
**MICHAEL B. JOLLY**  
ATTORNEY AT LAW

1018 PRESTON, 4th FLOOR  
HOUSTON, TEXAS 77008  
REGISTERED PATENT ATTORNEY

OFFICE (713) 237-8383  
FAX (713) 237-8385  
mjolly@aol.com

*SA New (For Shawn)*

September 15, 2004



Eric Mayer  
Brian Melton

Via Fax: 713-654-6666

Andrew Schirmer  
Dana S. Speer

Via Fax: 713-228-3510

Alison Kemmerer

Via Fax: 956-541-2170

Kathleen Horstler

Via Fax: 248-203-0763

RE: Humberto and Griselda Olvera  
FM 495 South Moore Field  
Mission, Texas

*Called  
9/16/04  
"preserve the  
scene  
we're  
sending  
Newell's  
office."*

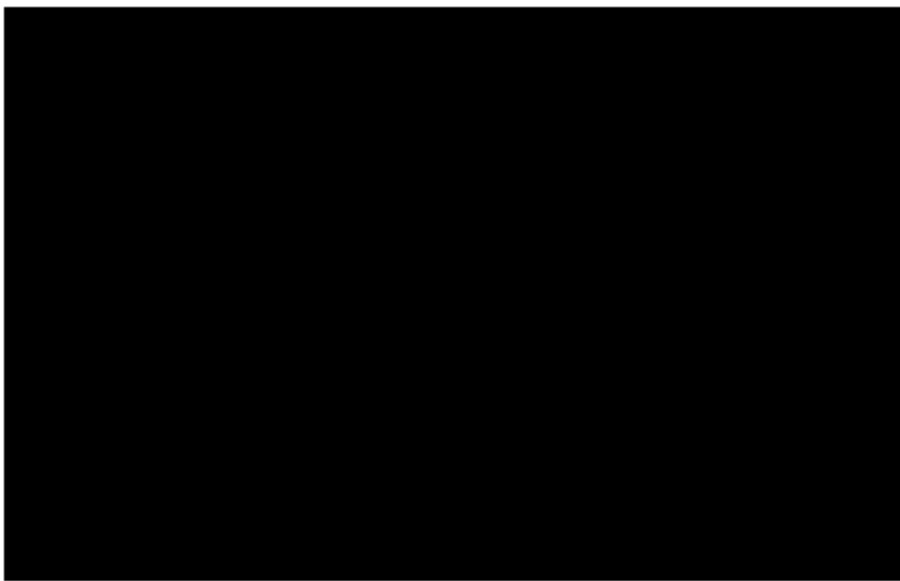
Dear Counsel:

                     house partially burned down due to a fire which originated from their 2001 Ford F150. The fire occurred on June 20, 2004. You are welcomed to inspect the house and the vehicle within the next few days. Please inform me of the date and time you wish to inspect my client's house and vehicle along with the identity of those who will attend.

Sincerely,

*Michael Jolly*  
Michael Jolly

MJH



# KEMP LYDICK

Attorneys and Counselors

Campbell Centre II, Suite 875  
8150 North Central Expressway  
Dallas, Texas 75206

Telephone 214.967.0000  
Fax 214.967.0182

[www.kemplydick.com](http://www.kemplydick.com)  
[www.kemplydick.com](http://www.kemplydick.com)

*New RECEIVED MAR 11 2005  
(for Shawn)*

David O. Kemp  
David O. Kemp, J.D., LL.M.

[dkemp@kemplydick.com](mailto:dkemp@kemplydick.com)

March 10, 2005

FORD MOTOR COMPANY  
RECEIVED  
CLAIMS UNIT  
MAR 23 2005  
OFFICE OF THE  
GENERAL COUNSEL

**FAX 313.845.4089**

Ford Motor Company  
c/o Shawn L. Norton, Claims Analyst  
Parklane Towers West, Suite 1500  
Dearborn, Michigan 48126-2568

Re:	Company	:	Shelter Mutual Insurance Company
	Our Claim Number	:	[REDACTED]
	Our Insured	:	[REDACTED]
	Date of Loss	:	02/27/2005
	Amount of Loss	:	\$45,000.00
	Our File Number	:	70000.004.Clay

*1997 Expedition*

Dear Ms. Norton:

Please be advised that this firm has been retained to protect the interests of Shelter Insurance Company (Shelter), subrogee of [REDACTED] Clay (the insureds), in the above referenced matter. All future contact with Shelter or the insureds should be directed through me.

My understanding of the facts to date are as follows: On or about February 27, 2005, [REDACTED] returned home and parked the subject vehicle in the garage. At approx 12:30 p.m. he stated that a neighbor discovered the fire/smoke and came to his house and notified him that the garage was on fire. An investigation into the cause of the fire was conducted and it was discovered that the fire originated in the subject vehicle. The fire burned the subject vehicle as well as other property located in the insureds' garage including another vehicle. This is the purpose of this letter to you, as well as to put Ford on notice of our claim.

There is a general consensus on the part of all who have made an inspection of the fire scene that the area of origin of the fire is the subject vehicle. Your product, the subject vehicle, in our view, is responsible for the fire. We are certainly open to any arguments and supporting data to the contrary. We are not producing an expert report at this time. I will

ENR-005-1C1-2747

pass along relevant information regarding the forensics investigation to date, as I have already done in this letter.

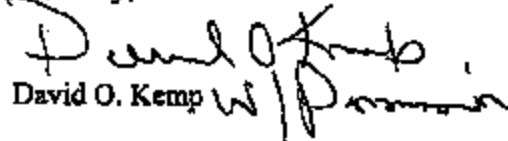
If you have insurance which you believe may cover all or any part of this claim, you are requested to notify your insurance company immediately so that they can take whatever action they may deem necessary to protect your interests.

Shelter has preserved the area of origin in the subject residence in its post fire condition, as well as the subject vehicle which allegedly caused this fire loss so that you or your insurer can inspect it, if you or your carrier so desire. This is done in a spirit of fairness, so you and your insurer can evaluate our position and/or prepare any defenses which you may think you have in this case. The homeowner is eager to begin repairs to his residence as soon as possible. Time is certainly of the essence to this homeowner in getting back into the residence as soon as possible. Consequently, neither Shelter nor the insured's will commence repairs in the area of origin, nor disturb the fire scene, until March 17, 2005, and will make the premises and vehicle available for you or your insurer's non-destructive inspection up to and including March 17, 2005. Please call me at 214.987.0003 ext. 1 to arrange such inspection. One of our representatives will want to be available. After March 17, 2005, such repairs will commence.

If you dispute that you are responsible for this claim, as my client alleges, or if you are aware of any facts or circumstances which indicate you are not at fault in this matter, please notify this office in writing that the claim is disputed and state your reasons therefore.

We look forward to your prompt response.

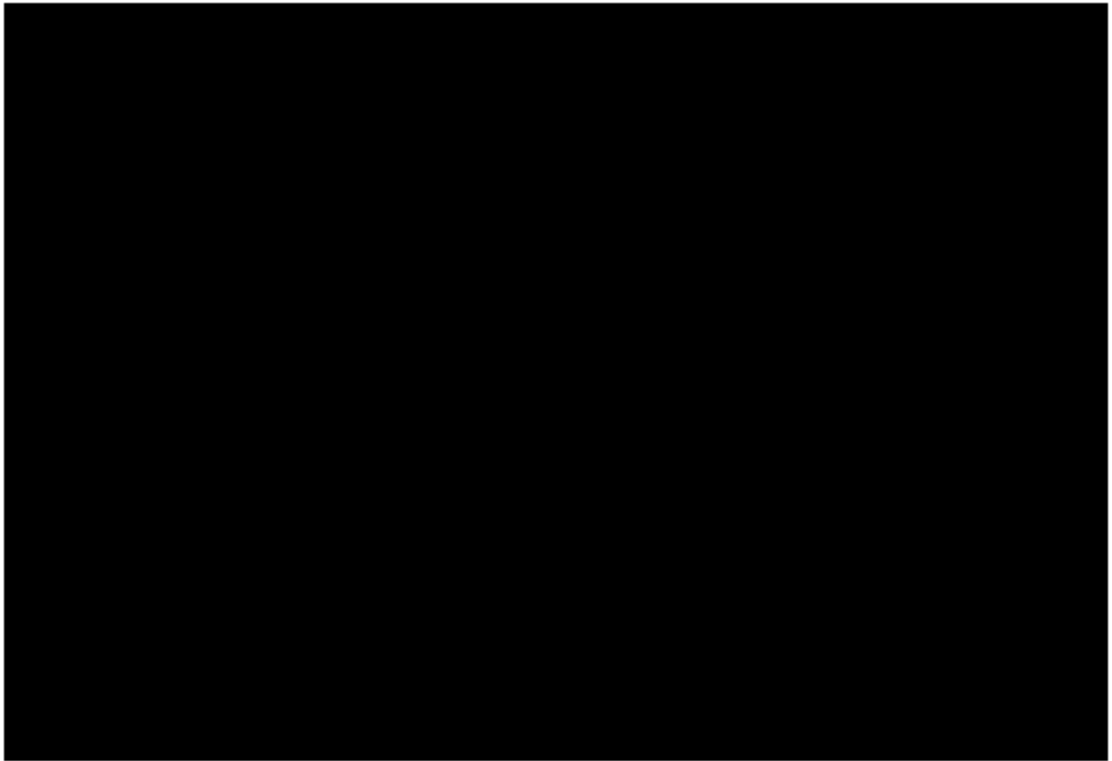
Sincerely,

  
David O. Kemp

DOK:wet

cc: Mr. Les Bryant, Via Fax: 479.751.6112

EN05-005-LC1-2748



CSOR0016

MORE II Legal Contact

01/22/1997 15:13:50

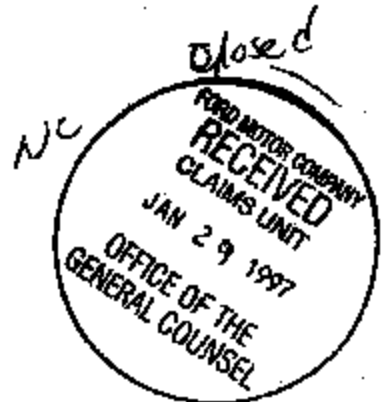
KANSAS CITY 53 Zn/Tr: C1 M/A: CONTACT NBR: 107354655 Opened: 08/12/1996  
 VIN: 1FTEX15N0T [REDACTED] Closed: 10/23/1996  
 Last Name: [REDACTED] First Name: [REDACTED] Status: CLOSED  
 Title: [REDACTED] MI: [REDACTED]  
 Address: [REDACTED]  
 City: PITTSBURG ST/PV: MO Zip/PC: [REDACTED] CC: USA  
 Home Phone: [REDACTED] Business Phone: [REDACTED] Ext: [REDACTED]  
 Year: 96 Model: F-SERIES  
 Mileage/Km: 16800 WSD: 11/10/1995

Dealer Name: ROY HURD FORD INC Sales Code: 153485 P&A: 05153  
 Causal Code: 0709 0704 Symptoms: 698200 704145  
 Serv Sales: 1 (1 or 2) Origin: GO Trans Date:  
 Veh Repl:  
 Case Type: 4B FIRES - EXHAUST-CAT. Means Code: B LGL INVEST-WTY-ATTY LETTE  
 Atty Name: JAMES W. STARNES Atty Memo: 417-883-7411/417-883-6795(F  
 Claimed Amt: Award Amt:  
 CANADA ONLY:  
 Court Code: Award Code:

F1=HELP F3=EXIT F4=COMMENT F5=ADD F6=UPD F9=CLOSE F12=CANC  
 1053 REQUESTED CONTACT DISPLAYED

LPORA041

*Subrogation*



*1/30/97  
 tel rec'd  
 money  
 40  
 from [unclear]  
 [unclear]  
 took  
 Vehicle  
 - Buy back -  
 Book -*

ER05-005-LC1-2749

PRODUCED BY FORD

CSOR0016

MORS II Legal Contact

01/30/1997 11:22:10

KANSAS CITY 53 Zn/Tr: C1 M/A: CONTACT NBR: 107354655 Opened: 08/12/1996  
 VIN: 1E7E7X15N0T7 Closed: 10/23/1996  
 Last Name: [REDACTED] First Name: [REDACTED] Status: CLOSED  
 Title: [REDACTED] MI:  
 Address: [REDACTED]  
 City: PITTSBURG ST/PV: MO Zip/PC: [REDACTED] CC: USA  
 Home Phone: [REDACTED] Business Phone: [REDACTED] Ext:  
 Year: 96 Model: F-SERIES  
 Mileage/Km: 16800 WSD: 11/10/1995

Dealer Name: ROY HURD FORD INC Sales Code: 153485 P&A: 05153  
 Causal Code: 0709 0704 Symptoms: 698200 704145  
 Serv Sales: 1 (1 or 2) Origin: GO Trans Date:  
 Veh Repl:  
 Case Type: 4B FIRES - EXHAUST-CAT. Means Code: B LGL INVEST-WTY-ATTY LETTE  
 Atty Name: JAMES W. STARNES Atty Memo: 417-883-7411/417-883-6795(F  
 Claimed Amt: Award Amt:  
 CANADA ONLY:  
 Court Code: Award Code:

F1=HELP F3=EXIT F4=COMMENT F5=ADD F6=UPD F9=CLOSE F12=CANC  
 I053 REQUESTED CONTACT DISPLAYED

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MORS II Contact Comments

01/30/1997 11:22:19

Last Name: [REDACTED] VIN: 1FTEX15N0TR [REDACTED]  
Home Phone: [REDACTED] Bus. Phone: [REDACTED] Ext:  
Dealer: ROY HURD FORD INC Dist/Reg: 53

CONTACT NBR: 107354655 Date: 08/12/1996 Analyst Code: 5157MW  
File Type: LEGAL Time: 15:01:59 Analyst Name: WOLF  
Comm Type: M MAIL Micro: Letter Code:

Comments:

More?: Y

ATTORNEY DEMAND LETTER DATED 8/7/96, RECEIVED 8/9/96 \*

\*\* REFERENCE CONTACT #S 107113063,107216084,107236,107236848 & 107244346 \*\*

ATTORNEY SAYS:

- THE VEHICLE HAS BEEN OUT OF SERVICE FOR 140 DAYS AND HAS HAD 4 REPAIR ATTEMPTS FOR A CONCERN WITH A CHECK ENGINE LIGHT
  - THE VEHICLE HAD A FIRE AFTER THE LAST REPAIR ATTEMPT
  - THE LEMON LAW REQUIRES FORD TO REPLACE THE VEHICLE WITH ONE THAT HIS ACCEPTABLE TO THE CUSTOMER; THEY DO NOT LIKE THE '87[SIC] BUT WOULD PREFER TO HAVE AN '86[SIC] (PRESUMABLY THIS IS A TYPO AND THE ATTORNEY MEANS '97 AND '96 RESPECTIVELY
  - THE CUSTOMER IS WITHHOLDING PAYMENTS UNDER THE MISSOURI MERCHANDISING
- F1=HELP F3=EXIT F5=ADD F7=PREV F8=NEXT F11=CANC L/TR F12=BASIC INFO  
E196 FIRST COMMENTS FOR CONTACT

OGDB330



CSOR0010

MORS II Contact Comments

01/30/1997 11:22:26

Last Name: [REDACTED] VIN: 1FTEX15N0T [REDACTED]  
Home Phone: [REDACTED] Bus. Phone: [REDACTED] Ext:  
Dealer: ROY HURD FORD INC Dist/Reg: 53

CONTACT NBR: 107354655 Date: 08/12/1996 Analyst Code: 5157MW  
File Type: LEGAL Time: 15:05:19 Analyst Name: WOLF  
Comm Type: 0 OUT CALL Micro: Letter Code:

Comments: More?: Y

PRACTICES ACT AGAINST ROY HURD FORD; THE MONEY IS IN ESCROW

\*

LEGAL CONTACTED THE S/M, BILL SPRAGUE, AND REQUESTED A COMPLETE COPY OF THE SERVICE AND SALES FILE. LPA CONTACTED OFFICE MANAGER, SUSIE GRAHAM, WHO SAYS:

-THE CUSTOMER RECEIVED A COMMERCIAL REBATE ON THE VEHICLE OF \$300  
-THE TITLE IS LISTED AS RONALD AND SANDRA BRANNON, DBA R&S ENTERPRISES

\*

LETTER FAXED TO ATTORNEY ACKNOWLEDGING RECEIPT OF HIS LETTER AND ADVISING THAT HE WILL BE RECONTACTED WHEN WE HAVE HAD AN OPPORTUNITY TO REVIEW THE PERTINENT INFORMATION

F1=HELP F3=EXIT F5=ADD F7=PREV F8=NEXT F11=CANC LTR F12=BASIC INFO  
1002 REQUESTED INFORMATION DISPLAYED OGDB330

CSOR0010

MORS II Contact Comments

01/30/1997 11:22:30

Last Name: [REDACTED] VIN: 1FTEK15N0TK [REDACTED]  
Home Phone: [REDACTED] Bus. Phone: [REDACTED] Ext:  
Dealer: ROY HORD FORD INC Dist/Reg: 53

CONTACT NBR: 107354655 Date: 09/06/1996 Analyst Code: 5157MW  
File Type: LEGAL Time: 14:26:38 Analyst Name: WOLF  
Comm Type: M MAIL Micro: Letter Code:

Comments:

More?: Y

\*\* ATTORNEY LETTER DATED 8/28/96, RECEIVED 8/30/96 \*\*

ATTORNEY SAYS:

-HE HAS BEEN WAITING FOR TWO WEEKS AND WANTS TO KNOW THE STATUS OF THE VEHICLE

\*  
LPA ATTEMPTED TO CONTACT THE ATTORNEY WHO WAS NOT AVAILABLE. LEFT MESSAGE  
REQUESTING CALLBACK.

F1=HELP F3=EXIT F5=ADD F7=PREV F8=NEXT F11=CANC LTR F12=BASIC INFO

I002 REQUESTED INFORMATION DISPLAYED

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CSOR0010

MORS II Contact Comments

01/30/1997 11:22:36

Last Name: [REDACTED] VIN: 1FTEX15N0TR [REDACTED]  
Home Phone: [REDACTED] Bus. Phone: [REDACTED] Ext:  
Dealer: ROY HURD FORD INC Dist/Reg: 53

CONTACT NBR: 107354655 Date: 09/06/1996 Analyst Code: 5157MW  
File Type: LEGAL Time: 17:25:20 Analyst Name: WOLF  
Comm Type: U UPDATE Micro: Letter Code:

Comments: More?: Y  
ATTORNEY RECONTACTED LPA. LPA ADVISED:  
-THE VEHICLE WAS PURCHASED AS A COMMERCIAL VEHICLE (\$300 COMMERCIAL ACCOUNT  
REBATE GIVEN AT TIME OF SALE)  
-IT IS NOT ELIGIBLE FOR LEMON LAW  
-FORD IS WILLING TO PROVIDE GOODWILL ASSISTANCE IN THE FORM OF AN OAC  
-REQUESTED THAT HE CONTACT HIS CLIENTS TO DISCUSS

F1=HELP F3=EXIT F5=ADD F7=PREV F8=NEXT F11=CANC LTR F12=BASIC INFO  
I002 REQUESTED INFORMATION DISPLAYED OGDR330

CSOR0010

MORS II Contact Comments

01/30/1997 11:22:39

Last Name: [REDACTED] VIN: 1FTEK15N0TR [REDACTED]  
Home Phone: [REDACTED] Bus. Phone: [REDACTED] Ext: [REDACTED]  
Dealer: ROY HURD FORD INC Dist/Reg: 53

CONTACT NBR: 107354655 Date: 09/09/1996 Analyst Code: 5157MW  
File Type: LEGAL Time: 10:59:20 Analyst Name: WOLF  
Comm Type: U UPDATE Micro: Letter Code:

Comments: More?: Y

LEA CONTACTED BILL SPRUGE, S/M WHO SAYS:

- THE VEHICLE IS STILL AT THE DEALER
- THE INSURANCE COMPANY SENT INSPECTORS SEVERAL WEEKS AGO AND REMOVED BURNED COMPONENTS FOR TESTING
- NO REPAIRS HAVE BEEN AUTHORIZED AND THE CUSTOMER HAS BEEN WITHOUT A VEHICLE FOR A MONTH
- THE FSE, JIM DEITZ, IS AWARE OF THE VEHICLE'S ONGOING CONCERNS, BUT WAS UNABLE TO INSPECT THE VEHICLE BEFORE THE FIRE
- THE INSURANCE COMPANY IS AMERICAN STATES INSURANCE, THE INSPECTOR'S NAME WAS WILLIAM REINHART (314) 445-1039

F1=HELP F3=EXIT F5=ADD F7=PREV F8=NEXT F11=CANC LTR F12=BASIC INFO  
I002 REQUESTED INFORMATION DISPLAYED OGDB330

CSOR0010

MORS II Contact Comments

01/30/1997 11:22:45

Last Name: [REDACTED] VIN: 1FTEK15N0TK [REDACTED]  
Home Phone: [REDACTED] Bus. Phone: [REDACTED] Ext:  
Dealer: ROY HURD FORD INC Dist/Reg: 53

CONTACT NBR: 107354655 Date: 09/09/1996 Analyst Code: 5157MW  
File Type: LEGAL Time: 11:01:37 Analyst Name: WOLF  
Comm Type: 0 OUT CALL Micro: Letter Code:

Comments:

More?: Y

LPA CONTACTED ATTORNEY AND ADVISED:

-THE VEHICLE NEEDS TO BE REPAIRED BEFORE IT CAN BE SUBMITTED FOR TRADE-IN  
-PROVIDED THE INSURANCE INFORMATION GIVEN TO THE DEALER; SUGGESTED HE CONTACT  
THEM TO COMPLETE REPAIRS

-HIS CLIENTS MAY BE WILLING TO KEEP THE TRUCK IF THEY CAN BE ASSURED THAT THE  
ELECTRICAL CONCERNS HAVE BEEN RESOVLED AND THE OTHER REPAIRS COMPLETED

\*

ATTORNEY SAYS HE WILL CONTACT THE INSURANCE COMPANY TO SEE IF HE CAN EXPEDITE  
REPAIRS

F1=HELP F3=EXIT F5=ADD F7=PREV F8=NEXT F11=CANC LTR F12=BASIC INFO

I002 REQUESTED INFORMATION DISPLAYED

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CSOR0010

MORE II Contact Comments

01/30/1997 11:22:49

Last Name: [REDACTED] VIN: 1FTEX15N0TK [REDACTED]  
Home Phone: [REDACTED] Bus. Phone: [REDACTED] Ext:  
Dealer: ROY HURD FORD INC Dist/Reg: 53

CONTACT NBR: 107354655 Date: 09/23/1996 Analyst Code: 5157MW  
File Type: LEGAL Time: 10:35:59 Analyst Name: WOLF  
Comm Type: 0 OUT CALL Micro: Letter Code:

Comments: More?: Y  
NO RESPONSE FROM ATTORNEY. LPA SENT FAX REQUESTING UPDATE ON STATUS OF  
REPAIRS.

F1=HELP F3=EXIT F5=ADD F7=PREV F8=NEXT F11=CANC LTR F12=BASIC INFO  
I002 REQUESTED INFORMATION DISPLAYED OGDB330

CSOR0010

MORS II Contact Comments

01/30/1997 11:22:53

Last Name: [REDACTED] VIN: 1FTFX15N0T [REDACTED]  
Home Phone: [REDACTED] Bus. Phone: [REDACTED] Ext:  
Dealer: ROY HURD FORD INC Dist/Reg: 53

CONTACT NBR: 107354655 Date: 09/26/1996 Analyst Code: 5157MW  
File Type: LEGAL Time: 09:31:46 Analyst Name: WOLF  
Comm Type: U UPDATE Micro: Letter Code:

Comments:

More?: Y

WILLIAM SPRAGUE, S/M CONTACTED LPA AND ADVISED:  
-THEY ORDERED PARTS FOR REPAIR OF THE VEHICLE AND ARE READY TO COMMENCE  
REPAIRS  
-THE CUSTOMER INDICATED TO HIM THAT THE INSURANCE COMPANY HAS AUTHORIZED  
REPAIRS  
-HE WILL CONTACT US WHEN THEY ARE COMPLETE

F1=HELP F3=EXIT F5=ADD F7=PREV F8=NEXT F11=CANC LTR F12=BASIC INFO  
1002 REQUESTED INFORMATION DISPLAYED

OGDB330

CSOR0010

MDRS II Contact Comments

01/30/1997 11:22:57

Last Name: [REDACTED] VIN: 1FTEX15N0T [REDACTED]  
Home Phone: [REDACTED] Bus. Phone: [REDACTED] Ext:  
Dealer: ROY HURD FORD INC Dist/Reg: 53

CONTACT NBR: 107354655 Date: 09/27/1996 Analyst Code: 5157MW  
File Type: LEGAL Time: 10:47:27 Analyst Name: WOLF  
Comm Type: U UPDATE Micro: Letter Code:

Comments: More?: Y

LPA CONTACTED PSE JIM DIETZ WHO ADVISED:  
-THE CONCERN WITH THE VEHICLE WAS INTERMITTENT  
-THE IN FLIGHT RECORDER WAS INSTALLED FOR TWO WEEKS PREVIOUSLY AND THE CONCERN  
DID NOT OCCUR; AFTER THE RECORDER WAS REMOVED THE CHECK ENGINE LIGHT CAME ON  
-ALTHOUGH THE CONCERN SEEMS TO BE IN THE SPEED SENSOR, THE SPEEDOMETER DOES  
NOT APPEAR TO BE MALFUNCTIONING  
-HE IS WILLING TO WORK WITH THE DEALER AFTER REPAIRS ARE COMPLETE TO INSPECT,  
AND IF POSSIBLE REPAIR THE VEHICLE

F1=HELP F3=EXIT F5=ADD F7=PREV F8=NEXT F11=CANC LTR F12=BASIC INFO  
I002 REQUESTED INFORMATION DISPLAYED OGDB330



CSOR0010

MORS II Contact Comments

01/30/1997 11:23:02

Last Name: [REDACTED] VIN: 1FTEK15N0TR [REDACTED]  
Home Phone: [REDACTED] Bus. Phone: [REDACTED] Ext: [REDACTED]  
Dealer: ROY HURD FORD INC Dist/Reg: 53

CONTACT NBR: 107354655 Date: 09/27/1996 Analyst Code: 5157MW  
File Type: LEGAL Time: 11:07:53 Analyst Name: WOLF  
Comm Type: 0 OUT CALL Micro: Letter Code:

Comments: More?: Y

LPA CONTACTED ATTORNEY AND ADVISED:

-THE FSE WILL GO TO THE DEALERSHIP IN AN EFFORT TO ISOLATE AND REPAIR THE  
VEHICLE AFTER THE FIRE REPAIRS ARE COMPLETE  
-THE CONCERN HAS BEEN INTERMITTENT AND THEREFORE HARD TO DIAGNOSE CORRECTLY  
-ALTHOUGH THE CUSTOMER'S VEHICLE IS NOT ELIGIBLE FOR REMEDY UNDER LEMON LAW,  
FORD WILL MAKE EVERY ATTEMPT TO REPAIR THE VEHICLE WHILE UNDER WARRANTY  
IF THE CONCERN CAN BE VERIFIED

\*

ATTORNEY STATES:

-HIS CLIENTS HAVE LOST USE OF THE VEHICLE FOR OVER 200 DAYS AND HAVE SUFFERED  
LOSS OF INCOME AND INCONVENIENCE WHICH THEY CAN SEEK REMEDY FOR UNDER THE  
F1=HELP F3=EXIT F5=ADD F7=PREV F8=NEXT F11=CANC LTR F12=BASIC INFO  
1002 REQUESTED INFORMATION DISPLAYED OGDB330

CSOR0010

MORS II Contact Comments

01/30/1997 11:23:07

Last Name: [REDACTED] VIN: 1FTEX15N0T [REDACTED]  
Home Phone: [REDACTED] Bus. Phone: [REDACTED] Ext:  
Dealer: ROY HURD FORD INC Dist/Reg: 53

CONTACT NBR: 107354655 Date: 09/27/1996 Analyst Code: 5157MW  
File Type: LEGAL Time: 11:09:28 Analyst Name: WOLF  
Comm Type: U UPDATE Micro: Letter Code:

Comments: More?: Y

UNIFORM COMMERCIAL CODE

-HE UNDERSTANDS THAT FORD WANTS TO VERIFY THAT A NON-CONFORMING CONDITION  
EXISTS AND HIS CLIENTS WILL COOPERATE WITH AN FSE INSPECTION

\*  
FAX SENT TO DEALER REQUESTING THAT THEY NOTIFY LPA WHEN FIRE REPAIRS ARE  
COMPLETE SO THE FSE INSPECTION CAN BE SCHEDULED

F1=HELP F3=EXIT F5=ADD F7=PREV F8=NEXT F11=CANC LTR F12=BASIC INFO  
I002 REQUESTED INFORMATION DISPLAYED OGDB330

CSOR0010

MORS II Contact Comments

01/30/1997 11:23:10

Last Name: [REDACTED] VIN: 1FTEX15N0TK [REDACTED]  
Home Phone: [REDACTED] Bus. Phone: [REDACTED] Ext:  
Dealer: ROY HURD FORD INC Dist/Reg: 53

CONTACT NBR: 107354655 Date: 10/23/1996 Analyst Code: 5157MW  
File Type: LEGAL Time: 12:28:28 Analyst Name: WOLF  
Comm Type: 0 OUT CALL Micro: Letter Code:

Comments: More?: Y

LPA CONTACTED JIM DIETZ, FSE WHO ADVISED:

-HE IS NOT AVAILABLE TO DO AN INSPECTION FOR SEVERAL WEEKS AND IS NOT SURE HE CAN RESOLVE THE CONCERN

-THE DEALER REPORTS THAT THE CUSTOMER WANTS TO GET OUT OF THE VEHICLE AND IS NO LONGER INTERESTED IN A REPAIR

\*

LPA CONTACTED THE ATTORNEY AND ADVISED:

-THE DEALER ADVISES US THAT THE CUSTOMER NO LONGER WANTS THE FSE TO ATTEMPT A REPAIR; THEY WANT OUT OF THE VEHICLE

-WE ARE WILLING TO OFFER A REPLACEMENT IF THE CUSTOMER PAYS FOR MILEAGE AND UPGRADE CHARGES

F1=HELP F3=EXIT F5=ADD F7=PREV F8=NEXT F11=CANC LTR F12=BASIC INFO

1002 REQUESTED INFORMATION DISPLAYED

OGDB330

CSOR0010

MORS II Contact Comments

01/30/1997 11:23:14

Last Name: [REDACTED] VIN: 1FTEX15N0T [REDACTED]  
Home Phone: [REDACTED] Bus. Phone: [REDACTED] Ext:  
Dealer: ROY HURD FORD INC Dist/Reg: 53

CONTACT NBR: 107354655 Date: 10/23/1996 Analyst Code: 5157MW  
File Type: LEGAL Time: 12:30:18 Analyst Name: WOLF  
Comm Type: U UPDATE Micro: Letter Code:

Comments:

Mora?: Y

-THE CUSTOMER MAY WANT TO START LOOKING FOR A VEHICLE SO THEY WE CAN DETERMINE  
COST OF THE TRANSACTION  
-WE DO NOT HANDLE THE FINANCING; HE MAY WANT TO APPROACH THE LENDER ABOUT  
SUBSTITUTION OF COLLATERAL

\*

SENT OFFER LETTER VIA FAX

F1=HELP F3=EXIT F5=ADD F7=PREV F8=NEXT F11=CANC LTR F12=BASIC INFO  
1002 REQUESTED INFORMATION DISPLAYED OGDH330

CSOR0010

MSRS II Contact Comments

01/30/1997 11:23:17

Last Name: [REDACTED] VIN: 1FTEX15NDTE [REDACTED]  
Home Phone: [REDACTED] Bus. Phone: [REDACTED] Ext:  
Dealer: ROY HURD FORD INC Dist/Reg: 53

CONTACT NBR: 107354655 Date: 10/23/1996 Analyst Code: 5157MW  
File Type: LEGAL Time: 15:21:35 Analyst Name: WOLF  
Comm Type: U UPDATE Micro: Letter Code:

Comments: More?: Y  
###THIS IS THE CLOSING COMMENT  
WILL FINALIZE OFFER WHEN CUSTOMER PROVIDES MSRP OF REPLACEMENT VEHICLE.

F1=HELP F3=EXIT F5=ADD F7=PREV F8=NEXT F11=CANC LTR F12=BASIC INFO  
I002 REQUESTED INFORMATION DISPLAYED OGDB330

CSOR0010

MORS II Contact Comments

01/30/1997 11:23:25

Last Name: [REDACTED] VIN: 1FTEX15N0T8 [REDACTED]  
Home Phone: [REDACTED] Bus. Phone: [REDACTED] Ext:  
Dealer: ROY HURD FORD INC Dist/Reg: 53

CONTACT NBR: 107354655 Date: 10/29/1996 Analyst Code: 5157MW  
File Type: LEGAL Time: 08:58:24 Analyst Name: WOLF  
Comm Type: C CALL BACK Micro: Letter Code:

Comments: More?: Y  
ATTORNEY LEFT A VOICE MAIL MESSAGE REQUESTING CALLBACK. LPA ATTEMPTED TO  
CONTACT THE ATTORNEY, WHO WAS NOT IN. LEFT MESSAGE WITH SECRETARY PROVIDING  
LPA NAME/PHONE NO.

F1=HELP F3=EXIT F5=ADD F7=PREV F8=NEXT F11=CANC LTR F12=BASIC INFO  
I002 REQUESTED INFORMATION DISPLAYED OGDB330

CSOR0010

**MORS II Contact Comments**

01/30/1997 11:23:29

Last Name: [REDACTED] VIN: 1FTEK15N0T [REDACTED]  
Home Phone: [REDACTED] Bus. Phone: [REDACTED] Ext:  
Dealer: ROY HURD FORD INC Dist/Reg: 53

CONTACT NBR: 107354655 Date: 10/30/1996 Analyst Code: 5157MW  
File Type: LEGAL Time: 17:38:33 Analyst Name: WOLF  
Comm Type: U UPDATE Micro: Letter Code:

Comments:

More?: Y

\*\* COMMENTS ADDED LATER DUE TO SYSTEMS MALFUNCTION \*\*  
10/29/96

ATTORNEY RECONTACTED LPA AND ADVISED:

- THE CUSTOMER HAS NOT BEEN ABLE TO LOCATE A 1996 VEHICLE
- THEY WOULD LIKE FORD TO FIND ONE FOR THEM (HE HAS FAKED A COPY OF THE STICKER
- HIS CLIENT WOULD PREFER TO GET INTO ANOTHER VEHICLE, PREFERABLY A 1996, BUT PERHAPS A 1997 IF THE UPGRADE CHARGES CAN BE MINIMIZED

\*

LPA ADVISED:

- WE CANNOT DO A VEHICLE SEARCH FROM HERE, BUT WE WILL ASK THE DEALER TO ASSIST AND WILL GET BACK WITH HIM WHEN INFORMATION IS AVAILABLE

F1=HELP F3=EXIT F5=ADD F7=PREV F8=NEXT F11=CANC LTR F12=BASIC INFO

**I002 REQUESTED INFORMATION DISPLAYED**

OGDB330

CSOR0010

MORE II Contact Comments

01/30/1997 11:23:33

Last Name: [REDACTED] VIN: 1FTEX15N0TK [REDACTED]  
Home Phone: [REDACTED] Bus. Phone: [REDACTED] Ext:  
Dealer: ROY HURD FORD INC Dist/Reg: 53

CONTACT NBR: 107354655 Date: 10/30/1996 Analyst Code: 5157MW  
File Type: LEGAL Time: 17:47:48 Analyst Name: WOLF  
Comm Type: U UPDATE Micro: Letter Code:

Comments: More?: Y  
LPA RECEIVED CALL FROM DOM RAY BEETON, WHO WAS AT THE DEALERSHIP. HE ADVISED:  
-THE CUSTOMER IS IRATE AND IS RAISING HIS VOICE AT DEALERSHIP PERSONNEL AS  
WELL AS HIMSELF AND IS DEMANDING A RESOLUTION  
-IS SEEKING AN UPDATE ON THE STATUS OF CURRENT NEGOTIATIONS  
\*

LPA ADVISED:  
-WE HAVE BEEN WORKING WITH THE CUSTOMER'S ATTORNEY TO RESOLVE THE CONCERN AND  
HAVE OFFERED TO REPLACE THE VEHICLE  
-THE ATTORNEY HAS REQUESTED US TO RESEARCH THE POSSIBLE AVAILABILITY OF A  
1996 F-SERIES; WE WOULD APPRECIATE HIS ASSISTANCE IN SEEING THIS IS DONE  
AS WELL AS PROCURING INFORMATION ON A COMPARABLY EQUIPPED 1997 F-SERIES  
F1=HELP F3=EXIT F5=ADD F7=PREV F8=NEXT F11=CANC LTR F12=BASIC INFO  
1002 REQUESTED INFORMATION DISPLAYED OGDB330



CSOR0010

MORS II Contact Comments

01/30/1997 11:23:37

Last Name: [REDACTED] VIN: 1FTEX15N0TR [REDACTED]  
Home Phone: [REDACTED] Bus. Phone: [REDACTED] Ext:  
Dealer: ROY HURD FORD INC Dist/Reg: 53

CONTACT NBR: 107354655 Date: 10/30/1996 Analyst Code: 5157MW  
File Type: LEGAL Time: 17:51:58 Analyst Name: WOLF  
Comm Type: U UPDATE Micro: Letter Code:

Comments: More?: Y  
-THE CUSTOMER NEEDS TO SPEAK WITH HIS ATTORNEY TO BE UPDATED ON CURRENT INFORMATION; ONCE HE HAS RETAINED AN ATTORNEY WE CANNOT SPEAK WITH HIM DIRECTLY

\*  
DOM RECONTACTED LPA AND ADVISED:  
-NO 1996 F-SERIES ARE AVAILABLE  
-HE IS FAXING INFORMATION ON 4 1997 F-SERIES, 2 OF WHICH ARE AT A DEALER ABOUT 100 MILES AWAY, AND THE OTHER 2 WHICH WILL BE DELIVERED AT THE DEALER AROUND 11/11/96  
-IT IS STILL POSSIBLE TO CHANGE THE EXTERIOR COLOR OF THE ORDERED VEHICLES IF WE ACT QUICKLY  
F1=HELP F3=EXIT F5=ADD F7=PREV F8=NEXT F11=CANC LTR F12=BASIC INFO  
1002 REQUESTED INFORMATION DISPLAYED OGDB330

Last Name: [REDACTED] VIN: 1FTEK15N0T [REDACTED]  
Home Phone: [REDACTED] Bus. Phone: [REDACTED] Ext:  
Dealer: ROY HURD FORD INC Dist/Reg: 53

CONTACT NBR: 107354655 Date: 10/30/1996 Analyst Code: 5157MW  
File Type: LEGAL Time: 17:55:14 Analyst Name: WOLF  
Comm Type: U UPDATE Micro: Letter Code:

Comments: More?: Y  
LPA ATTEMPTED TO CONTACT THE ATTORNEY, WHO WAS NOT AVAILABLE. LPA SPOKE WITH HIS SECRETARY, CINDY, AND ADVISED:  
-THE CUSTOMER IS CAUSING A DISTURBANCE AT THE DEALERSHIP  
-THEY NEED TO LET HIM KNOW WE ARE WORKING TOWARD A RESOLUTION, SINCE WE CANNOT CALL HIM OURSELVES  
-WE WILL FAX A COPY OF THE 1997 INFORMATION FOR HIS REVIEW  
-AS AS GOODWILL GESTURE, WE WILL WAIVE MILEAGE AND UPGRADE CHARGES FOR A COMPARABLE VEHICLE, BUT THE CUSTOMER MUST PAY THE DEALER FOR THE FIRE REPAIRS HE HIRED THEM TO DO; THE DEALER WILL NOT RELEASE THE VEHICLE FOR TRADE IN UNTIL THIS IS RESOLVED  
-FORD HAS CONSISTENTLY SHOW A GOOD-FAITH EFFORT; WE EXPECT THEM TO DO THE SAME  
F1=HELP F3=EXIT F5=ADD F7=PREV F8=NEXT F11=CANC LTR F12=BASIC INFO  
I002 REQUESTED INFORMATION DISPLAYED OGDB330

CSOR0010

MORS II Contact Comments

01/30/1997 11:23:44

Last Name: [REDACTED] VIN: 1FTEX15N0T[REDACTED]  
Home Phone: [REDACTED] Bus. Phone: [REDACTED] Ext:  
Dealer: ROY HURD FORD INC Dist/Reg: 53

CONTACT NBR: 107354655 Date: 10/31/1996 Analyst Code: 5157MW  
File Type: LEGAL Time: 13:41:08 Analyst Name: WOLF  
Comm Type: O OUT CALL Micro: Letter Code:

Comments: More?: Y

LPA CONTACTED SALES MANAGER, GORDON JACKSON, AT SOUTHERN FORD (HARDY, AR).  
WHO SAYS:

- THE TWO VEHICLES LISTED AS BEING AT THEIR DEALERSHIP ARE NOT AVAILABLE  
(ONE IS A DEMO AND THE OTHER HAS BEEN SOLD)
- THEY HAVE JUST GOTTEN ANOTHER F-150 SUPERCAB WITH A 507A PEP PKG, BUT IT  
HAS WHITE, TWO-TONED PAINT AND A BIGGER (5.4) ENGINE
- HE IS WILLING TO LET THE CUSTOMER COME AND LOOK AT THE TRUCK

\*

LPA CONTACTED ATTORNEY AND ADVISED HIM ABOUT THE STATUS OF THE TRUCKS AT  
SOUTHERN FORD AND PROVIDED HIM WITH THE NAME AND PHONE NUMBER OF THE SALES  
MANAGER. ATTORNEY WILL INFORM CUSTOMER.

F1=HELP F3=EXIT F5=ADD F7=PREV F8=NEXT F11=CANC LTR F12=BASIC INFO

I002 REQUESTED INFORMATION DISPLAYED

OGDB330

Last Name: [REDACTED] VIN: 1FTEX15N0TK [REDACTED]  
Home Phone: [REDACTED] Bus. Phone: [REDACTED] Ext:  
Dealer: ROY HURD FORD INC Dist/Reg: 53

CONTACT NBR: 107354655 Date: 11/05/1996 Analyst Code: 5157MW  
File Type: LEGAL Time: 11:29:34 Analyst Name: WOLF  
Comm Type: U UPDATE Micro: Letter Code:

## Comments:

More?: Y

ATTORNEY CONTACTED LPA AND ADVISED:

- THE CUSTOMER LOOKED AT THE VEHICLE AT THE ARKANSAS DEALER AND DID NOT LIKE THE COLOR
- HE WENT TO BILL GRANT FORD (P&A 05057) AND WAS TOLD A BLUE F-150 SUPERCAB WAS DUE IN BY 11/7 OR 11/8 AND HE IS INTERESTED
- DOES NOT HAVE THE VIN OR THE EQUIPMENT LISTING
- IS NOT SURE IF THE CUSTOMER IS INTERESTED IN THE RED F-SERIES WHICH ARE ARRIVING AT ROY HURD FORD THE WEEK OF 11/11/96

\*

LPA CONTACTED KELLY GRANT, SALES MANAGER AT BILL GRANT FORD, WHO ADVISED:

-HE WILL FAX A COPY OF THE DEALER INVOICE

F1=HELP F3=EXIT F5=ADD F7=PREV F8=NEXT F11=CANC LTR F12=BASIC INFO

I002 REQUESTED INFORMATION DISPLAYED

OGDB330

CSOR0010

MORE II Contact Comments

01/30/1997 11:23:51

Last Name: [REDACTED] VIN: 1FTEX15N0TR [REDACTED]  
Home Phone: [REDACTED] Bus. Phone: [REDACTED] Ext:  
Dealer: ROY HURD FORD INC Dist/Reg: 53

CONTACT NBR: 107354655 Date: 11/05/1996 Analyst Code: 5157MW  
File Type: LEGAL Time: 11:31:03 Analyst Name: WOLF  
Comm Type: U UPDATE Micro: Letter Code:

Comments: More?: Y

-THE VEHICLE IS AT HIS DEALERSHIP  
-HE IS NOT SURE IF THEY WOULD BE WILLING TO DO A DEALER TRADE WITH ROY HURD  
FORD UNLESS THEY CAN OBTAIN ANOTHER DIFFICULT TO OBTAIN VEHICLE (SUCH AS  
AN EXPLORER)

\*

F1=HELP F3=EXIT F5=ADD F7=PREV F8=NEXT F11=CANC LTR F12=BASIC INFO  
1002 REQUESTED INFORMATION DISPLAYED OGDB330

CSOR0010

NORS II Contact Comments

01/30/1997 11:23:53

Last Name: [REDACTED] VIN: 1FTEX15N0TK [REDACTED]  
Home Phone: [REDACTED] Bus. Phone: [REDACTED] Ext:  
Dealer: ROY HURD FORD INC Dist/Reg: 53

CONTACT NBR: 107354655 Date: 11/12/1996 Analyst Code: 5157MW  
File Type: LEGAL Time: 11:22:17 Analyst Name: WOLF  
Comm Type: U UPDATE Micro: Letter Code:

Comments: More?: Y  
KELLY GRANT, SALES MANAGER AT BILL GRANT FORD, CONTACTED LPA AND ADVISED  
THAT THEY ARE UNWILLING TO DO A DEALER TRADE WITH ROY HURD FORD UNLESS FORD  
GIVES THEM AN EXPEDITION IN EXCHANGE.

\*  
LPA CONTACTED DOM AND ADVISED:  
-BILL GRANT FORD IS BEING UNCOOPERATIVE AND FORD WILL NOT AGREE TO THEIR  
DEMANDS  
\*

F1=HELP F3=EXIT F5=ADD F7=PREV F8=NEXT F11=CANC LTR F12=BASIC INFO  
1002 REQUESTED INFORMATION DISPLAYED OGDB1.0

CSOR0010

MORS II Contact Comments

01/30/1997 11:23:56

Last Name: [REDACTED] VIN: 1FTEK15N0TK [REDACTED]  
Home Phone: [REDACTED] Bus. Phone: [REDACTED] Ext: [REDACTED]  
Dealer: ROY HURD FORD INC Dist/Reg: 53

CONTACT NBR: 107354655 Date: 11/19/1996 Analyst Code: 5157MW  
File Type: LEGAL Time: 15:04:44 Analyst Name: WOLF  
Comm Type: U UPDATE Micro: Letter Code:

Comments: More?: Y

\*\* COMMENTS ENTERED LATER DUE TO SYSTEMS MALFUNCTION \*\*  
11/14/96

ATTEMPTED TO CONTACT SALES MANAGER, J.R. RENTRO, WHO WAS NOT IN. SPOKE WITH  
"CAMON" IN SALES AT JIMMY MICHEL MOTORS, WHO SAYS:

-THEY HAVE SEVERAL '96 F-SERIES, BUT ANY OF THE DIESELS WILL BE HEAVY DUTY  
TRUCKS (F-250 OR F-350). ALL OF THEM ARE TWO-TONED.  
-HE WILL SEND DEALER INVOICE INFORMATION AND DISCUSS WITH HIS SALES MANAGER  
THE POSSIBILITY OF PARTICIPATING IN A DEALER TRADE

F1=HELP F3=EXIT F5=ADD F7=PREV F8=NEXT F11=CANC LTR F12=BASIC INFO  
1002 REQUESTED INFORMATION DISPLAYED OGDB330

CSOR0010

NORS II Contact Comments

01/30/1997 11:23:59

Last Name: [REDACTED] VIN: 1PTEK15N0TK [REDACTED]  
Home Phone: [REDACTED] Bus. Phone: [REDACTED] Ext:  
Dealer: ROY HURD FORD INC Dist/Reg: 53

CONTACT NBR: 107354655 Date: 11/19/1996 Analyst Code: 5157MW  
File Type: LEGAL Time: 15:07:49 Analyst Name: WOLF  
Comm Type: 0 OUT CALL Micro: Letter Code:

Comments: More?: Y  
SPOKE WITH KEN COATNEY (SP7), TRUCK SALES AT JIMMY MICHEL MOTORS, WHO SAYS:  
-THEY ARE WILLING TO DO A DEALER TRADE WITH ROY HURD FORD  
-THERE ARE SIX F-250 DIESELS, ALL TWO-TONED SO HE IS NOT SURE WHICH INVOICE  
TO FAX US

\*  
SPOKE WITH ATTORNEY AND ASKED HIM TO CONTACT HIS CLIENT TO PINPOINT WHICH OF  
THE 1996 VEHICLES HE WAS LOOKING AT; ATTORNEY WILL RECONTACT LPA

\*  
CONTACTED RAY BEETON, DOM, PER HIS REQUEST TO REVIEW STATUS IF THIS CASE

\*  
F1=HELP F3=EXIT F5=ADD F7=PREV F8=NEXT F11=CANC LTR F12=BASIC INFO  
1002 REQUESTED INFORMATION DISPLAYED OGDB330



CSOR0010

MORS II Contact Comments

01/30/1997 11:24:02

Last Name: [REDACTED] VIN: 1FTEX15N0TK [REDACTED]  
 Home Phone: [REDACTED] Bus. Phone: [REDACTED] Ext:  
 Dealer: ROY HURD FORD INC Dist/Reg: 53

CONTACT NBR: 107354655 Date: 11/19/1996 Analyst Code: 5157MW  
 File Type: LEGAL Time: 15:10:56 Analyst Name: WOLF  
 Comm Type: U UPDATE Micro: Letter Code:

Comments: More?: Y  
 RECEIVED FAX FROM JIMMY MICHEL FORD FOR A RED/WHITE F-250 DIESEL(PEP PKG 613A)  
 AND REVIEWED RAV FIGURES. THIS VEHICLE WOULD COST THE CUSTOMER AN ADDITIONAL  
 \$5000 ON TOP OF WHAT FORD HAS ALREADY OFFERED.  
 \*

CONTACTED ATTORNEY AND ADVISED:  
 -FORD WILL NOT PAY FOR THE ADDITIONAL UPGRADE  
 -IF THE CUSTOMER CAN PAY FOR THE DIFFERENCE, JIMMY MICHEL MOTORS IS WILLING  
 TO TRADE WITH ROY HURD FORD  
 -THE CLIENT MUST EITHER ACCEPT THE BLACK TRUCK COMING INTO THE DEALERSHIP OR  
 WAIT FOR ONE TO BE ORDERED FOR HIM

F1=HELP F3=EXIT F5=ADD F7=PREV F8=NEXT F11=CANC LTR F12=BASIC INFO  
 I002 REQUESTED INFORMATION DISPLAYED OGDB330

CSOR0010

MOHS II Contact Comments

01/30/1997 11:24:05

Last Name: [REDACTED] VIN: 1FTEX15N0TR [REDACTED]  
Home Phone: [REDACTED] Bus. Phone: [REDACTED] Ext:  
Dealer: ROY HURD FORD INC Dist/Reg: 53

CONTACT NBR: 107354655 Date: 11/26/1996 Analyst Code: 5157MW  
File Type: LEGAL Time: 11:46:08 Analyst Name: WOLF  
Comm Type: U UPDATE Micro: Letter Code:

Comments:

More?: Y

ATTORNEY CONTACTED LPA AND ADVISED:

- HIS CLIENT IS UNWILLING TO PAY FOR THE ADDITIONAL UPGRADE AND DOES NOT WANT TO WAIT FOR A VEHICLE TO BE BUILT
- HE WILL ONLY ACCEPT A REFUND
- HE UNDERSTANDS THAT FORD ATTEMPTED A GOODWILL SETTLEMENT
- HE WILL HAVE THE FINANCE COMPANY SEND INFORMATION TO FACILITATE THE RAV CALCULATIONS

\*

LPA ADVISED:

- WE WILL SEND A REFUND OFFER LETTER, WHICH THE ATTORNEY MUST RESPOND TO IN WRITING BEFORE WE WILL PROCEED

F1=HELP F3=EXIT F5=ADD F7=PREV F8=NEXT F11=CANC LTR F12=BASIC INFO

1002 REQUESTED INFORMATION DISPLAYED

OGDB330

CSOR0010

MORS II Contact Comments

01/30/1997 11:24:08

Last Name: [REDACTED] VIN: 1FTEX15N0T [REDACTED]  
Home Phone: [REDACTED] Bus. Phone: [REDACTED] Ext:  
Dealer: ROY HURD FORD INC Dist/Reg: 53

CONTACT NBR: 107354655 Date: 11/26/1996 Analyst Code: 5157MW  
File Type: LEGAL Time: 11:46:40 Analyst Name: WOLF  
Comm Type: U UPDATE Micro: Letter Code:

Comments: Mora7: Y  
LETTER FAXED TO ATTORNEY  
\*  
FAX OF FINANCIAL INFORMATION SENT TO LPA FROM ARCADIA FINANCE CO.  
\*

F1=HELP F3=EXIT F5=ADD F7=PREV F8=NEXT F11=CANC LTR F12=BASIC INFO  
1002 REQUESTED INFORMATION DISPLAYED OGDB330

Last Name: [REDACTED] VIN: 1FTEX15N0T[REDACTED]  
Home Phone: [REDACTED] Bus. Phone: [REDACTED] Ext:  
Dealer: ROY HURD FORD INC Dist/Reg: 53

CONTACT NBR: 107354655 Date: 11/29/1996 Analyst Code: 5157MW  
File Type: LEGAL Time: 11:51:26 Analyst Name: WOLF  
Comm Type: F FAX Micro: Letter Code:

## Comments:

More?: Y

ATTORNEY FAXED ACCEPTANCE OF LPA'S REFUND OFFER. ATTORNEY ADDS:  
-THEY HAVE MADE APPLICATION FOR REFUND OF THEIR NON-FORD SERVICE CONTRACT  
AND EXPECT THAT ARCADIA WILL REIMBURSE THEM IF THE FUNDS COME IN AFTER  
THE TRANSACTION HAS BEEN COMPLETED  
-THE CLIENT IS STILL WITHHOLDING THE INSURANCE PAYMENT TO THE DEALER UNTIL  
THE TIME OF THE "CLOSING", OR WE CAN HANDLE IT AS A "CREDIT"

\*  
LPA FAXED LETTER TO ATTORNEY ADVISING:

-THE DEALER AND THE FINANCE COMPANY ARE SEPARATE BUSINESS ENTITIES FROM FORD  
AND HE WILL HAVE TO CONTACT THEM TO NEGOTIATE AGREEMENTS; HIS CLIENT MUST  
BE IN A POSITION TO DELIVER THE VEHICLE LEIN FREE TO FORD FOR THE OFFER TO  
F1=HELP F3=EXIT F5=ADD F7=PREV F8=NEXT F11=CANC LTR F12=BASIC INFO  
1002 REQUESTED INFORMATION DISPLAYED

OGDB330

CSOR0010

**MORS II Contact Comments**

01/30/1997 11:24:13

Last Name: [REDACTED]  
Home Phone: [REDACTED]  
Dealer:

ROY HURD FORD INC

Bus. Phone: [REDACTED]

VIN: 1FTEX15N0TR [REDACTED]  
Ext: [REDACTED]  
Dist/Reg: 53

CONTACT NBR: 107354655  
File Type: LEGAL  
Comm Type: U UPDATE

Date: 01/07/1997  
Time: 18:01:52  
Micro: 4872451

Analyst Code: 5157MW  
Analyst Name: WOLF  
Letter Code:

Comments:

\*\* MICRO NUMBER ADDED \*\*

More?: N

F1=HELP F3=EXIT F5=ADD F7=PREV F8=NEXT F11=CANC LTR F12=BASIC INFO  
1002 REQUESTED INFORMATION DISPLAYED

OGDB330

**AMERICAN STATES**  
**INSURANCE**  
A part of LINCOLN NATIONAL CORPORATION  
SPRINGFIELD (MO) BRANCH

777 EAST BATTLEFIELD ROAD, SUITE 104-C  
P.O. BOX 4103  
SPRINGFIELD, MISSOURI 65808-4103  
(417) 861-2373

September 24, 1996

Ford Motor Company  
Attn: Risk Management Department  
P.O. Box 43360  
Detroit, MI 48243

NC  
mhr

Re: Our Insured : [REDACTED]  
Economy Saving Co.  
Claim No. : [REDACTED]  
Loss Date : 7-12-96  
Vehicle : 1996 Ford F-150 1/2 ton  
VIN : 1FTEX15NOT[REDACTED]  
Ford Dealer : Roy Hurd Ford, Buffalo, Missouri  
Loss Amount : \$3,901.88- Includes insured's deductible

Dear Sir/Madam:

We have handled a claim for fire damage to our insured's vehicle. According to the terms of their policy with our company, we are now subrogated to their right of recovery to the extent of our payment.

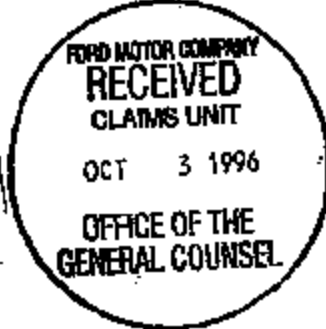
Investigation indicates that you are responsible for the damages. We are, therefore, placing you on notice of our subrogation claim.

Please contact the undersigned at the address or telephone number listed above to discuss settlement of this matter.

Thank you very much.

Respectfully:  
AMERICAN STATES INSURANCE COMPANY

  
David M. Rice, A.I.C.  
Claims Representative



cc: Jim Starnes  
Yates, Mauck, et al  
3333 E. Battlefield  
Springfield, MO 65807

96 OCT -1 P12 50  
OWNER RELATIONS OPS/CAC  
ENG-905-LC1-2781

AMERICAN STATES INSURANCE COMPANIES  
AMERICAN STATES INSURANCE COMPANY • AMERICAN ECONOMY INSURANCE COMPANY • AMERICAN STATES LIFE INSURANCE COMPANY  
AMERICAN STATES INSURANCE COMPANY OF TEXAS • AMERICAN STATES PREFERRED INSURANCE COMPANY  
AMERICAN STATES LLOYDS INSURANCE COMPANY





*Tennessee Farmers Mutual Insurance Companies*

Suite A - 3930 Western Ave. Knoxville, Tennessee 37921  
Phone 423-525-4187  
Fax 423-525-7995

September 26, 1996

Ford Motor Credit, Office of General Counsel  
3 Park Lane Place  
Park Lake Towers, West, Suite 300  
Deerborne, Michigan 48126



RE: Policy #: [REDACTED]  
Insured: [REDACTED]  
D/A: 8-21-96  
County: Knox

Dear Sirs:

I am writing in regards to the above captioned accident where our insured's vehicle caught fire for no explained reason. The vehicle was still under warranty and we are turning to you for reimbursement for we have made settlement with our insured.

I have enclosed the photograph and copy of the title on our insured's vehicle along with supporting documentation showing what we have paid for conclusion of the claim.

I appreciate you reviewing the attached material and forwarding a check in the amount of \$12,345.00 for settlement of this claim.

Very truly yours,

TENNESSEE FARMERS MUTUAL INSURANCE COMPANY

  
Scott McClain, AIC  
Senior Claims Representative

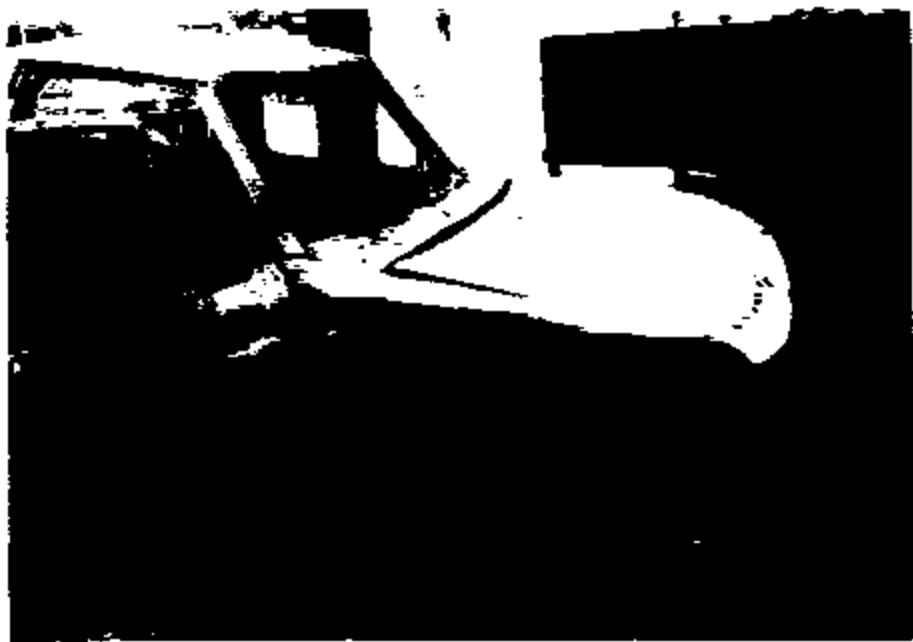
SM:jj

Enclosure

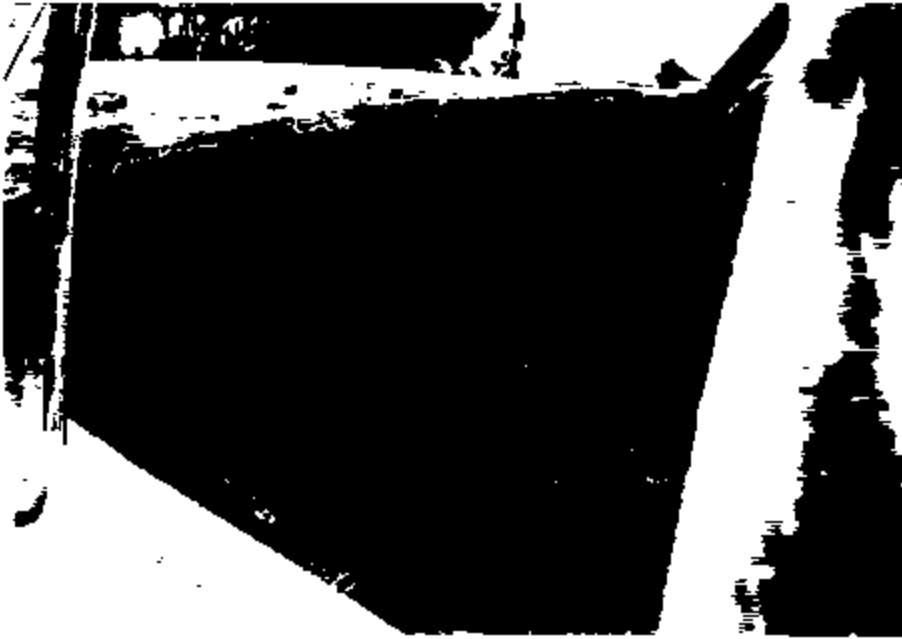
ERS-885-LC1-2762

PRODUCED BY FORD





ER05-005-LC1-2783



8025-005-LC1-2784



ER05-009-L01-2785



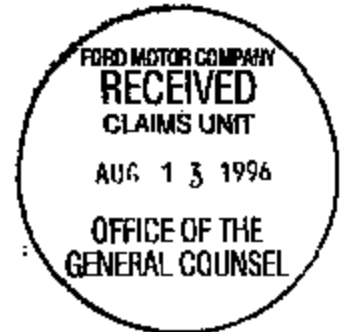
# Allstate

ALLSTATE INSURANCE COMPANY  
P.O. BOX 4254  
ATLANTA GA 30302

08/05/96

(800) 726-1211

FORD MOTOR CO  
3 PARKLANE BLVD  
DEARLORN MI 48126



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. YOUR PROMPT PAYMENT WILL BE APPRECIATED. THANK YOU.

SINCERELY,  
SUBROGATION DEPARTMENT  
ALLSTATE INSURANCE COMPANY

CSP:G

YOUR FILE NO.  
YOUR INSURED  
ADDRESS

DEARLORN MI

OUR CLAIM NO.  
OUR INSURED  
LOSS DATE

: 03/14/96

LOCATION

RICHIE RD OFF OF HWY 293

FAIRPLAY

SC

AMOUNT OF LOSS: \$16,143.00

CLAIM PHOTOGRAPH  
RECORD

Claim No. [REDACTED]

Insured [REDACTED]



PHOTO # \_\_\_\_\_ TAKEN 3/12/86  
DATE

Negative available?  Yes  No

← \_\_\_\_\_  
DESCRIPTION \_\_\_\_\_



PHOTO # \_\_\_\_\_

Negative avail. \_\_\_\_\_

DESCRIPTION \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_



COMMENTS: 1

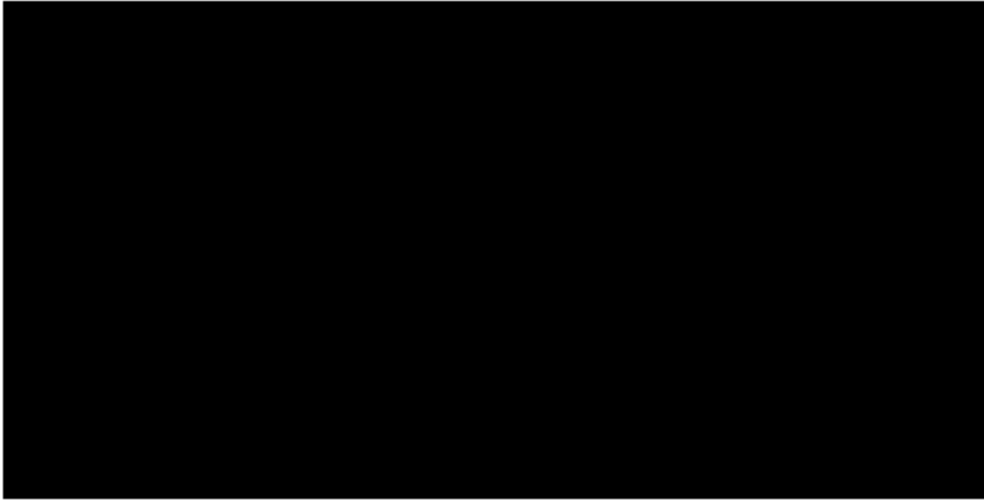
SUBMITTED BY: \_\_\_\_\_

NAME

DATE

3/12/86

C814-2





FARMERS

To: Jody Banciu  
OGC

DFW SPECIALTY BRANCH CLAIMS OFFICE  
P.O. Box 150988  
Arlington, Texas 76015  
Metro (817) 487-8892  
(817) 487-8882  
FAX (817) 487-9810

September 7th, 1999  
Ford Customer Service  
352 Turnpike Rd  
Southboro, MA 01772

RE: Our Insured : [REDACTED]  
Loss Date : 12/27/1998  
Our Policy# : [REDACTED]  
Claim # : [REDACTED]  
Your Insured: [REDACTED]  
Address: : [REDACTED]  
: Bedford, TX [REDACTED]  
Your File # :  
Total Claim : \$7,714.00

Our investigation has established that the above loss was caused by the negligence of your insured. If you have already made a settlement with our insured, please advise us immediately.

We have made payment to our insured for the damage. By virtue of our subrogation rights, this is to advise you that we shall seek reimbursement from you for the amount of the damage.

We have a medical payment subrogation interest on any payments you may make to settle injury claims, arising out of this accident. Please acknowledge our rights and protect us on any payments you make.

Our insured's vehicle was rendered a total loss. We will forward support for disposition of salvage when sold.

Please be advised that if you are contacted by an attorney representing our insured, they do not represent our interest. We will expect a separate payment for our damages unless we notify you otherwise.

Your prompt consideration of our claim will be appreciated.

Sincerely  
Farmers Insurance Company of Arizona  
*Maria Fernandez*  
Maria Fernandez  
Subrogation Analyst



11/20/1999 10:29 AM

FARMERS INSURANCE GROUP OF COM. ES  
Farmers. Gets You Back Where You Belong.  
P.O. Box 7774  
Ft Worth, TX 76111  
(817)831-6201 FAX: (817)838-8342

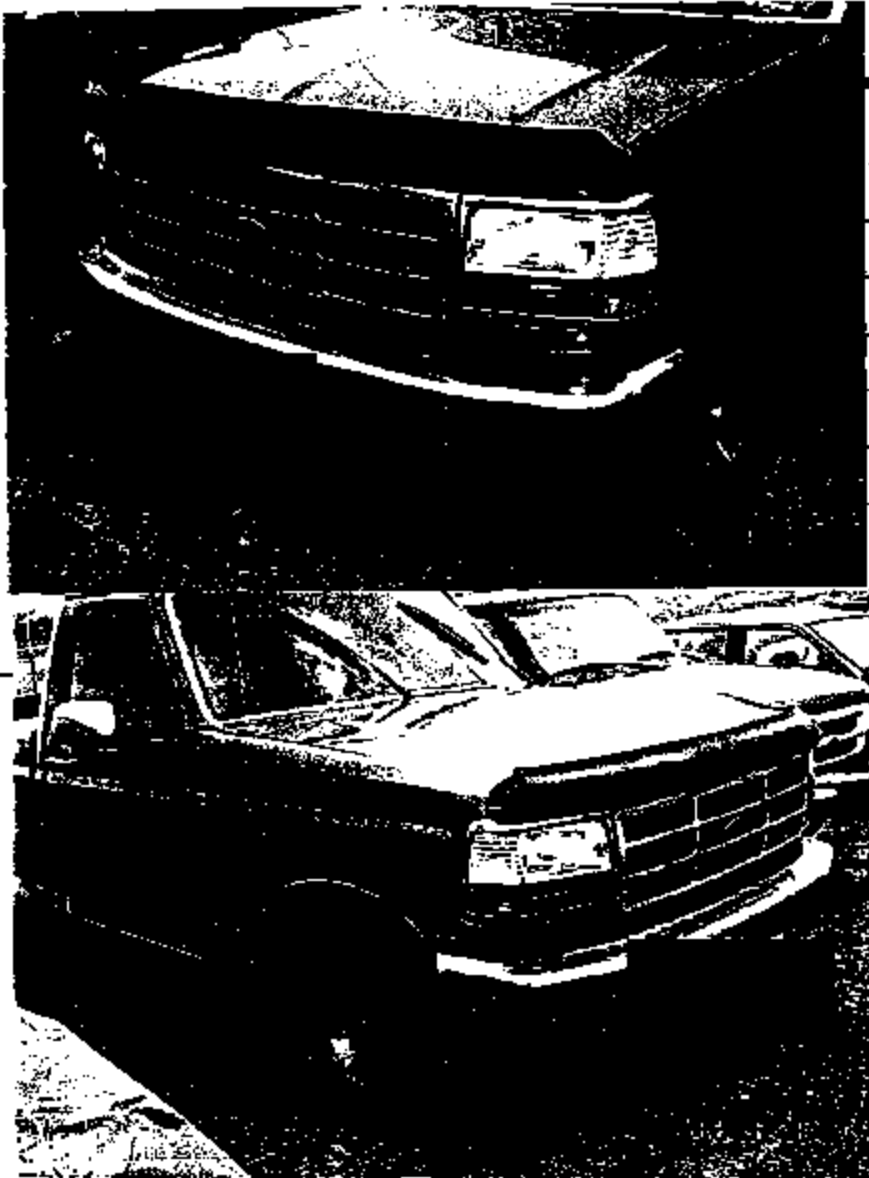
PHOTOS

Insured: [REDACTED]  
Vehicle Owner: [REDACTED]

Claim #: [REDACTED]  
Policy #: [REDACTED]

Vehicle: 1996 FORD 2WT  
Primary Impact:

Secondary Impact:

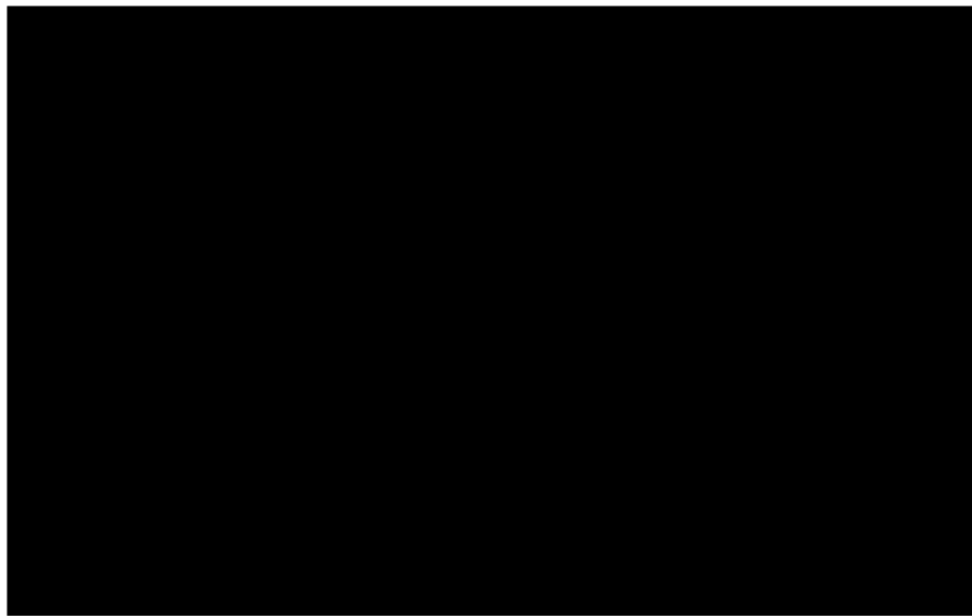


ARMERS INSURANCE GROUP OF COM

ARMERS INSURANCE GROUP OF COM YES  
Farmers. Gets You Back Where You Belo.  
P.O. Box 7774  
Ft Worth, TX 76111  
(817)931-6201 FAX: (817)838-8342

PHOTOS







# FARMERS INSURANCE GROUP

OF COMPANIES

February 11, 1998

CARLSBAD BRANCH CLAIMS OFFICE  
2351 Faraday Drive  
P. O. Box 9049  
Carlsbad, CA 92018-9049  
780-431-2616  
FAX 780-431-5933

FORD MOTOR CORPORATION  
3 PARKLANE TOWERSWEST#400  
DEARBORN, MI 48126

FORD MOTOR COMPANY  
RECEIVED  
CLAIMS UNIT  
FEB 17 1998  
OFFICE OF THE  
GENERAL COUNSEL

RE: Our Insured : [REDACTED]  
Loss Date : 11/18/1997  
Our Policy# : [REDACTED]  
Claim # : [REDACTED]  
Your Insured: [REDACTED]  
Address: [REDACTED]  
: DEARBORN, MI [REDACTED]  
Your File # : N/A  
Claims Rep : MARY SKEVINGTON  
Total Claim : \$1,293.73 (PROPERTY DAMAGES AS A RESULT OF VEHICLE FIRE CAUSED  
BY FACTORY DEFECT)

Our investigation has established that the above loss was caused by the negligence of your insured.

We have made payment to our insured for the damage. By virtue of our subrogation rights this is to advise you that we shall seek reimbursement from you for the amount of the damage.

Our insured's vehicle was rendered a total loss. We will forward support for disposition of salvage when sold.

Our name should appear on any check made payable to our insured in settlement of his or her damage. If you have already made a settlement with our insured, please advise us immediately.

Your prompt consideration of our claim will be appreciated.

Sincerely  
FARMERS INSURANCE EXCHANGE

  
SUZANNE B. HAUSER  
Subrogation Analyst

ER85-825-LC1-2781

PRODUCED BY FORD





**PAUL M. LUCKETT.**  
*Attorney & Counselor-at-Law*

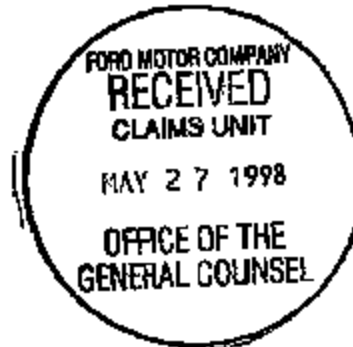
1121-B DELAWARE AVENUE  
MOBILE, MISSISSIPPI 39648

TELEPHONE (601) 250-1144  
FACSIMILE (601) 684-3875

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

May 20, 1998

Ford Motor Company  
Office Of The General Counsel  
Parklane Towers West  
Suite 400  
3 Parklane Blvd.  
Dearborn, MI. 48126.



**RE: NOTICE OF CLAIM**  
**NOTICE OF REPRESENTATION**

To The General Counsel:

This letter will provide you with notice that Paul M. Lockett, Esq., has been retained by [REDACTED] to pursue a products liability/defective product claim against Ford Motor Company. Our cause of action stems from the total loss of [REDACTED] 1995 Ford F-150 (Eddie Hauer Edition) truck.

On or about January 24, 1998, while paying for the fuel just pumped in his truck, [REDACTED] heard screams of "fire." [REDACTED] turned to see his truck burning. Without warning, the pick-up had suddenly exploded through no fault of [REDACTED]. The truck was damaged beyond repair.

We respectfully request that upon receipt of this letter that you turn this matter over to your insurance carrier or other responsible party immediately. In an effort to avoid the filing of a lawsuit, we welcome the opportunity to discuss this claim with you.

Should you have any questions, please do not hesitate to call on me.

With kindest regards, I remain,

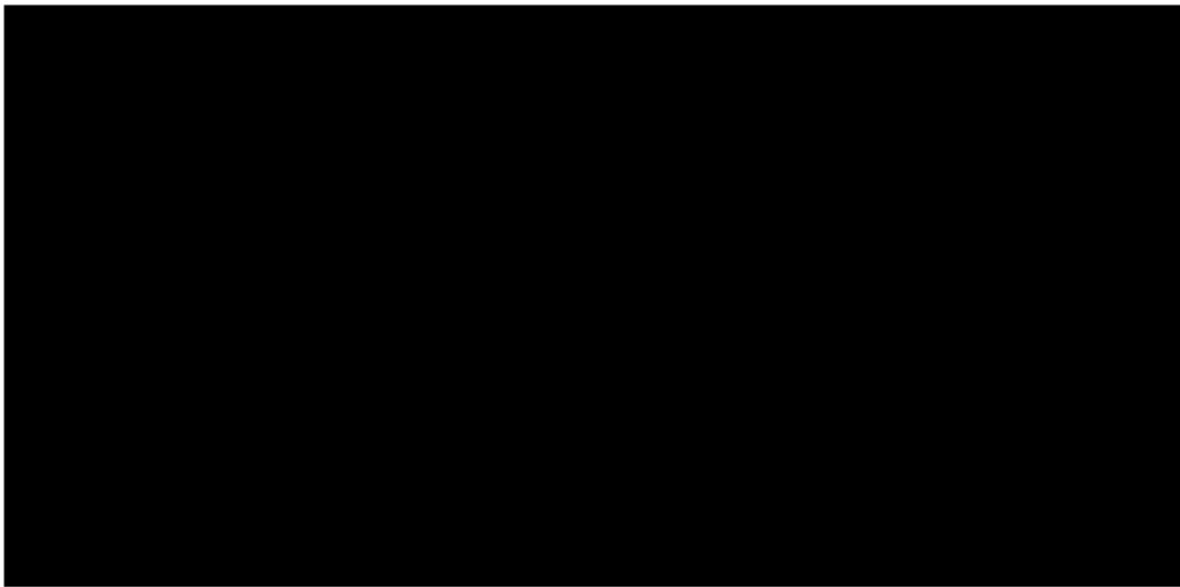
*Paul M. Lockett*

Paul M. Lockett

xc [REDACTED]

ER05-005-LC1-2782

PRODUCED BY FORD





4512-438

Ford Owner Relations Operations  
Ford Motor Company

300 Renaissance Center  
P.O. Box 43368  
Detroit, Michigan 48243

June 6, 1996

Mr. Jack Wright  
RR 1 Box 44  
Fombell, PA 16123

Dear Mr. Wright

You recently contacted us regarding your 1997 F-Series.

Customer satisfaction is one of the primary objectives of Ford Motor Company and we try to make every attempt to ensure that our owners are satisfied. We recognize the importance of retaining customer confidence in us after the purchase.

This type of situation is normally handled by your insurance carrier. If your insurance company feels there could be a manufacturer liability due to a product defect, they would file a subrogation claim against us.

Thank you for contacting Ford. We appreciate the opportunity to consider your request.

Sincerely,

Andrew E. Powers  
Consumer Affairs

BRIGHTON CSO  
JUN 13 1996





FRANKLIN TOWNSHIP VOLUNTEER FIRE DEPARTMENT  
FIRE / INCIDENT RESPONSE FORM

INCIDENT NUMBER 96056 DATE 5/7/96

STRUCTURE  VEHICLE  TYPE OF INCIDENT:  
BRUSH  ACCIDENT  ASSIST  SERVICE

TIMES OF INCIDENT:  
RECEIVED 2428 ENROUTE 260 ON SCENE 288 BACK IN SERVICE 3057

WEATHER \_\_\_\_\_ ROAD COND. \_\_\_\_\_ TEMP. \_\_\_\_\_ WIND DIR. \_\_\_\_\_ WIND MPH \_\_\_\_\_

LOCATION OF INCIDENT Franklin Twp

OWNER [REDACTED] OCCUPANT \_\_\_\_\_

ADDRESS [REDACTED] ADDRESS \_\_\_\_\_

CITY/STATE/ZIP Fembell Pa 16823 CITY/STATE/ZIP \_\_\_\_\_

PHONE [REDACTED] PHONE \_\_\_\_\_

TYPE OF STRUCTURE 1997 Ford Pick EXPOSURES \_\_\_\_\_

AREA OF ORIGIN DASH POSSIBLE CAUSE Electrical

HYDRANT(S) USED \_\_\_\_\_ LADDER(S) USED \_\_\_\_\_ WATER / CHEM USED \_\_\_\_\_

ATTACK LINES USED : 1 1/2 \_\_\_\_\_ 2 1/2 \_\_\_\_\_ DELUGE GUN \_\_\_\_\_ LDH \_\_\_\_\_

APPARATUS RESPONDED: (E6) (E2) (E4) (E7) (C101) (C102) (C103)

MUTUAL AID CO RESPONDED: ELLWOOD PERRY WAYNE OTHER N/A

EST DAMAGE: STRUCTURE \_\_\_\_\_ CONTENTS \_\_\_\_\_ TOTAL \_\_\_\_\_

INSURANCE EST.: STRUCTURE \_\_\_\_\_ CONTENTS \_\_\_\_\_ TOTAL \_\_\_\_\_

OIC Bailey OFFICERS ATTENDED ZILKA Home, MARTINO, HUGHES, DUNFEL

FIRE FIGHTERS ATTENDED \_\_\_\_\_ ENGINEERS DENOTED BY TRUCK NUMBER \_\_\_\_\_

- |                            |                          |                                |
|----------------------------|--------------------------|--------------------------------|
| 1. <u>J. DAVENPORT 046</u> | 11. <u>K. WILEY 026</u>  | 21. <u>V. LAURIE JACOBS FR</u> |
| 2. <u>B. FAIR 060</u>      | 12. <u>B. HUGHES 035</u> | 22. _____                      |
| 3. <u>R. RICHARDS 013</u>  | 13. <u>B. DUNFEL 013</u> | 23. _____                      |
| 4. <u>B. ZILKA 045</u>     | 14. <u>A. HUGHES 017</u> | 24. _____                      |
| 5. <u>Flouie 102</u>       | 15. <u>G. WENNER 037</u> | 25. _____                      |
| 6. <u>D. Campbell 025</u>  | 16. <u>M. DUNFEL</u>     | 26. _____                      |
| 7. <u>W. Jacobs 045</u>    | 17. _____                | 27. _____                      |
| 8. <u>R. JACKSON 013</u>   | 18. _____                | 28. _____                      |
| 9. <u>M. GARDNER 01219</u> | 19. _____                | 29. _____                      |
| 10. <u>MARTINO 015 206</u> | 20. _____                | 30. _____                      |

REPORT FILED BY: Steve Bailey TITLE: Chief

752-9264

Jon. Hauschalter Asst Chief

752-2875

BRIGHTON C90  
JUN 06 1996

Vehicle was sitting driveway behind the house. Mr. Weight exited the vehicle approximately 2 hrs before the fire. When he returned to the vehicle and opened the drivers side door he was met by sparks. He then returned to his house and dialed 911.

Fire was confined to dash and interior of truck. Fire started in area a base of steering column. Interior of truck had heavy soot. Drivers side seat was melted down from top to bottom. The drivers side window was cracked open very slightly. No extinguishing agent was needed as fire was out due to lack of O<sub>2</sub> and flammable materials. The dash was melted to mid dash.

Insurance Agent: Dan Fenechi

Policy # [REDACTED]

1997 Ford Pickup  
with approx 2000 miles

RECORDED



**Travelers Property Casualty**  
A Member of Travelers Group



Subrogation

P.O. Box 12647  
Reading, PA 19612-2647  
610 371-7858  
FAX: 610 371-7468



04/03/97

Shawn Norton  
Ford Motor Co  
3 Parklane Blvd Ste 400  
Dearborn, MI 48126-2568

Re: Subrogation Claim  
Our Insured: [REDACTED]  
Our File No.: [REDACTED]  
Date of Loss: 01/16/97  
Your Insured: [REDACTED] (Ford Inc.)  
Your File No.: 1995 F-Series

Dear Shawn,

We represent the insurance company for [REDACTED] who sustained a loss on 01/16/97. Our investigation of the incident shows that your insured is liable for our insured's loss.

We have paid our insured \$905.60 for this loss. We are requesting reimbursement of that amount and our insured's deductible of \$500.00 for a total of \$1,405.60.

In response to your letter dated March 25, 1997, please find enclosed a copy of my pertinent file documentation. It is my understanding, and the understanding of our insured's attorney that this vehicle is being "bought back" by Ford under the Lemon Law.

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

We appreciate your prompt attention.

Sincerely,

Lisa M. Gibble  
Claim Representative  
610-371-7428

ENG-885-LC1-2796



# State Farm Insurance Companies

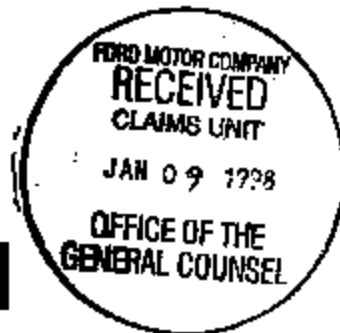


December 23, 1997

Pittsburgh Airport Service Center  
650 Cherrington Parkway  
Crescent, PA 15108-2983

ATTN MR HOWARD E KEYS MGR  
PRODUCT CLAIMS DEPT  
FORD MOTOR CO  
PARK LANE TOWER W  
3 PARKLANE BLVD STE 400  
DEARBORN MI 48126

✓  
NT



RE: Our Claim #: [REDACTED]  
Our Insured: [REDACTED]  
Date of Loss: December 3, 1997  
Vehicle Involved: 1995 Ford F150 Pickup  
VIN: 1FTBF14N4SL [REDACTED]

Dear Mr. Keys:

The 1995 Ford F150 Pickup Truck owned by [REDACTED] Sr. is insured by State Farm Mutual Automobile Insurance Company.

This vehicle experienced a fire on December 3, 1997.

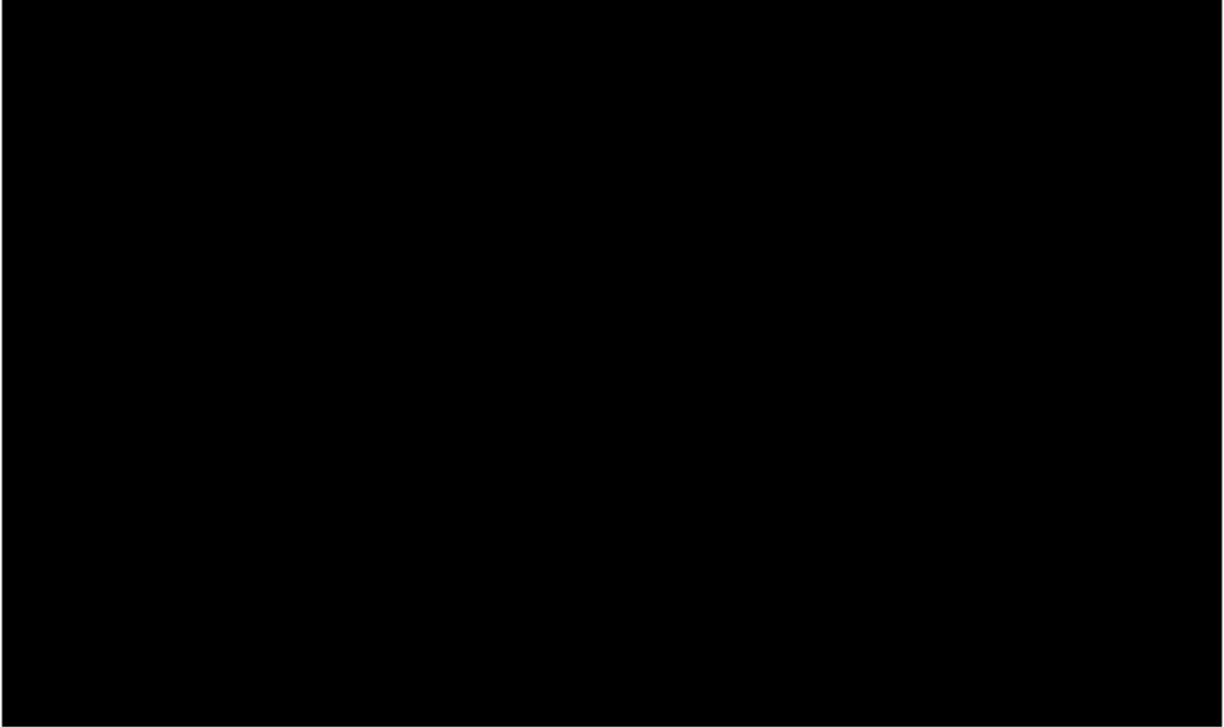
State Farm would like to give you an opportunity to inspect the 1995 Ford F150 Pickup Truck and give you advance notice of our potential subrogation claim. Please contact me at (412) 262-7533 to set up a time for your inspection.

Sincerely,

A handwritten signature in cursive that reads "Darrell E. Knight".

Darrell E. Knight  
Claim Specialist  
Special Investigation Unit  
(412) 262-7533

DEX/d/pas/027/1223063



# SULLIVAN, STOLIER & RESOR

A PROFESSIONAL LAW CORPORATION  
209 POYDRAS STREET, SUITE 2600  
NEW ORLEANS, LOUISIANA 70112-4000

JACK MARK BYOLIER\*  
STEPHEN M. SULLIVAN  
STEPHEN C. RESOR  
CHRISTOPHER C. JOHNSTON  
VINSON J. KNIGHT  
MICHAEL M. NEUNIER  
JAMES PETER KOVATA  
JOHN G. PIERSEN, JR.  
GORDON E. ROUNTREE, JR.  
MATTHEW K. BROWN  
GREGORY W. RONIGER  
GLORIA T. LASTRA  
ANTVA FISHER ROSENBERG\*\*

\*ALSO ADMITTED IN DISTRICT OF COLUMBIA  
\*\*ALSO ADMITTED IN CALIFORNIA

OF COUNSEL  
CHARLES ROSEN, II  
TELEPHONE (504) 581-1044  
FACSIMILE (504) 581-8808  
EMAIL:  
sbs@ssrslaw.com  
www.sullivanstolierresor.com

April 4, 2003

RECEIVED APR 6 2003

Shawn R. Norton  
Claims Handler/Product Liability  
Ford Motor Company  
Parklane Towers West  
Suite 303  
Parklane Blvd.  
Dearborn, Michigan 48126-3566

Re: United Fire Group Claim No. 203 17 01055961  
Our File: 2759-01

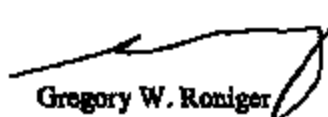
Dear Ms. Norton:

This office represents Joseph A. Harper, Gary A. Harper and Steve Sanderson in connection with property damages sustained in a fire at [REDACTED], Kenner, LA [REDACTED]

It is our understanding that the fire originated in a defective Ford vehicle owned by [REDACTED], Kenner, LA [REDACTED] and that your office has already been notified of this claim by his insurer.

We would appreciate hearing from you concerning an amicable disposition of this matter at your next opportunity.

With kindest personal regards,

  
Gregory W. Roniger

GWR/mkk  
Enclosures  
cc: Mr. Joe Harper

ER05-005-LC1-2798





RUDOLPH

# State Farm Insurance Companies®



May 12, 2003

VIA FACSIMILE 313-845-4089

FORD MOTOR CO  
PARKLANE TWRS WEST  
300 PARKLANE BLVD STE 3000  
DEARBORN MI 48126-2568

Tulsa Operations Center  
12222 State Farm Boulevard  
P.O. Box 22127  
Tulsa, OK 74121-2127  
1-800-320-8829  
641-7500 (Local Only)  
1-918-641-7585 (Fax)

RECEIVED  
MAY 16 2003

RE: Our Claim Number: [REDACTED]  
Our Insureds: [REDACTED]  
Date of Loss: May 8, 2003  
Location of Loss: [REDACTED] Broken Arrow, OK [REDACTED]  
Amount of Loss: Unknown at this time

Dear Sir/Madam:

We are writing to you regarding a loss sustained by our insureds. Our investigation indicates Ford Motor Company may be responsible for this loss. By virtue of our payment, we are entitled to recover from the responsible party. Please contact me at 1-800-320-8829, Ext. 7582, within 24 hours of the date of this letter if you wish to inspect the fire scene.

If you have liability insurance, please refer this letter to your insurance company and inform us of your insurer's name, their address, and your policy number. If you do not have insurance, please respond to us regarding your position on this matter.

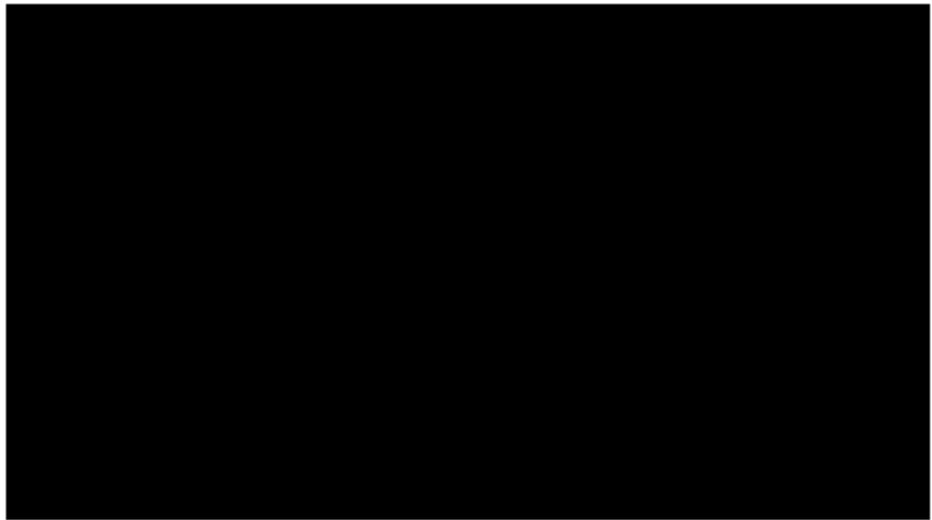
In order to assist you in evaluating and processing the subrogation claim we are asserting, we may provide nonpublic personal information about our customer. We are sharing this information to effect, administer, or enforce a transaction authorized by the consumer. However, you are neither authorized nor permitted to: (1) use the customer information we provide for any purpose other than to evaluate and process the subrogation claim, or (2) disclose or share the customer information we provide for any purpose other than to evaluate and process the subrogation claim.

Your cooperation is appreciated.

Sincerely,

*Debra Garrels*  
Debra Garrels  
Claim Representative  
800-320-8829, Ext. 7582  
641-7500, Ext. 7582 (Tulsa Only)  
State Farm Fire and Casualty Company

113/0512005



# SULLIVAN, STOLIER & RESOR

A PROFESSIONAL LAW CORPORATION  
508 Poydras Street, Suite 2800  
New Orleans, Louisiana 70112-4000

JACK MARK STOLIER\*  
STEPHEN M. SULLIVAN  
STEPHEN G. RESOR  
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GREGORY W. RONIGER  
GLORIA T. LASTRA  
AYNA FISHER ROSENBERG\*\*

\*ALSO ADMITTED IN DISTRICT OF COLUMBIA  
\*\*ALSO ADMITTED IN ALABAMA

OF COUNSEL:  
CHARLES ROSEN, II  
TELEPHONE (504) 581-1044  
FACSIMILE (504) 581-8808  
EMAIL:  
srosmey@slrslawfirm.com  
www.thehealthlawcenter.com

April 4, 2003

RECEIVED APR 8 2003

Shawn R. Norton  
Claims Handler/Product Liability  
Ford Motor Company  
Parklane Towers West  
Suite 303  
Parklane Blvd.  
Deerborn, Michigan 48126-3566

Re: United Fire Group Claim No. [REDACTED]  
Our File: 2759-01

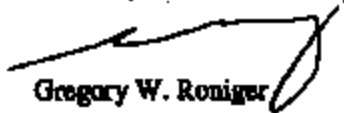
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This office represents Joseph A. Harper, Gary A. Harper and Steve Sanderson in connection with property damages sustained in a fire at [REDACTED] Kenner, LA [REDACTED]

It is our understanding that the fire originated in a defective Ford vehicle owned by [REDACTED], Kenner, LA [REDACTED], and that your office has already been notified of this claim by his insurer.

We would appreciate hearing from you concerning an amicable disposition of this matter at your next opportunity.

With kindest personal regards,

  
Gregory W. Roniger

GWR/mkk  
Enclosures  
cc: Mr. Joe Harper



# SULLIVAN, STOLIER & RESOR

A PROFESSIONAL LAW CORPORATION  
208 POYDRAS STREET, SUITE 2600  
NEW ORLEANS, LOUISIANA 70112-4000

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STEPHEN C. RESOR  
CHRISTOPHER C. JOHNSON  
VINSON J. KNIGHT  
MICHAEL M. NEUNIER  
JAMES PETER KOVATA  
JOHN D. FISKEEN, JR.  
GORDON E. MOUNTREE, JR.  
MATTHEW K. BROWN  
GREGORY W. RONIGER  
GLORIA T. LASTRA  
ANVA FISHER ROSENBERG\*\*

\*ALSO ADMITTED IN DISTRICT OF COLUMBIA  
\*\*ALSO ADMITTED IN ILLINOIS

OF COUNSEL  
CHARLES ROSEN, II  
TELEPHONE (504) 581-1044  
FACSIMILE (504) 581-8608  
EMAIL:  
attorney@sullivanfirm.com  
www.sullivanfirm.com

April 4, 2003

RECEIVED APR 8 2003

Shawn R. Norton  
Claims Handler/Product Liability  
Ford Motor Company  
Parklane Towers West  
Suite 303  
Parklane Blvd.  
Deerborn, Michigan 48126-3566

Re: United Fire Group Claim No. 203 [REDACTED]  
Our File: 2759-01

Dear Ms. Norton:

This office represents Joseph A. Harper, Gary A. Harper and Steve Sanderson in connection with property damages sustained in a fire at [REDACTED] Kenner, LA [REDACTED]

It is our understanding that the fire originated in a defective Ford vehicle owned by [REDACTED] [REDACTED] street, Kenner, LA [REDACTED] and that your office has already been notified of this claim by his insurer.

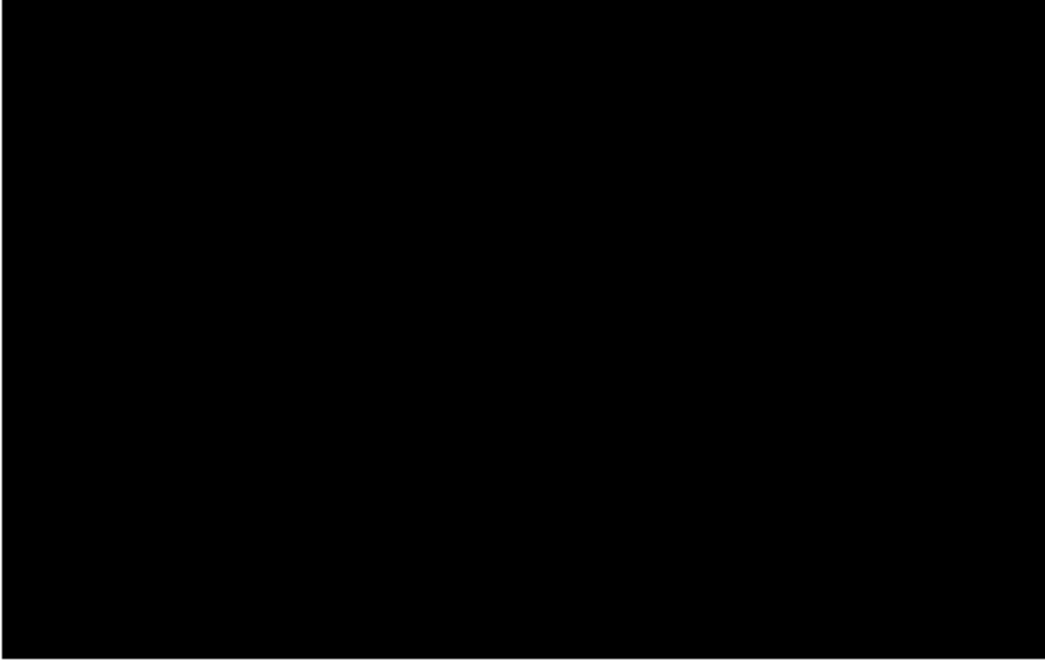
We would appreciate hearing from you concerning an amicable disposition of this matter at your next opportunity.

With kindest personal regards,

  
Gregory W. Roniger

GWR/mkk  
Enclosures  
cc: Mr. Joe Harper

ER25-005-LC1-2861



MAR 30 2005

BEGINNING OF CONTACT  
03/30/2005

VOICE OF THE CUSTOMER TRACKING SYSTEM

08.00.04

REGION: 21 ATLANTA	OGC ISSUE	CASE NBR: 1468270685
VIN: 5LMPU28LXWL	ZONE: B1	OPENED: 03/29/2005
	ENGINE: L VEH TYPE: T	CLOSED: 03/29/2005

LAST NAME: [REDACTED]	FIRST NAME: [REDACTED]	STATUS: CLOSED
TITLE: [REDACTED]	MI: [REDACTED]	
ADDRESS: [REDACTED]		
CITY: GREER	STATE: SC	ZIP: [REDACTED]
HOME PHONE: [REDACTED]		
MODEL YEAR: 1999	MODEL: NAVIGATOR WAGON 4X4	
MILEAGE: 1		
DEALER NAME: D & D MOTORS, INC.	SALES CODE: F21795	P & A: 00976
REASON CODE: 0792 LEGAL - ACCIDENT / FIRE		
SYMPTOMS: 704146 FIRE/SMOKE VISIBLE FLAME UNDERHOOD		

ORIGIN: CAC138 - US CONCERN CASE BASE COMMUNICATION: PHONE  
 ACTION: 706 - CONTACT ADVANCED TO OGC  
 DOCUMENT: ANALYST: CDSOUZA1 CAROL DSOUZA

DATE: 03/29/2005 TIME: 13.00.26:  
 ACTION DATA/COMMENTS:

CUSTOMER SAID: -THE VEHICLE CAUGHT ON FIRE -THIS WAS IN JUNE OF 2004-THE FIRE DEPARTMENT WAS CALLED AND THE PRIVATE INVESTIGATOR WAS CALLED IN TOO -THIS CAUSED EXTENSIVE DAMAGE TO HOME AND TO PROPERTY-THE VEH WAS PARKED FOR THREE HOURS WHEN THIS HAPPENED-CUST HAS MADE NUMEROUS PHONE CALLS AND HAS NOT GOT A CALL BACK FROM ANYONE IN FORD -CUST HAS NOW RELOCATED  
 DEALER SAID: -NONECRC ADVISED: I WILL FORWARD THIS INFORMATION TO THE FORD OGC DEPARTMENT. YOU WILL BE CONTACTED WITHIN 3-5 BUSINESS DAYS.-CUST PHONE NUMBERS ARE - OFFICE - 884 234 0871 - H  
 OME - 864 567 5734

FORD MOTOR COMPANY  
 RECEIVED  
 CLAIMS UNIT  
 MAR 30 2005  
 OFFICE OF THE  
 GENERAL COUNSEL

CONSUMER AFFAIRS

03/30/2005 FAXIGIN

ER05-005-LC1-2882





LAW OFFICES  
**BILLINGS, CUNNINGHAM, MORGAN & BOATWRIGHT**

PROFESSIONAL ASSOCIATION  
330 E. CENTRAL BOULEVARD  
AT LAKE EOLA

ORLANDO, FLORIDA 32801

TELEPHONE (407) 425-2000 FAX (407) 843-8274  
E-MAIL: info@cmb.com



N. BREVARD (321) 258-4668  
TOLL FREE 1-888-425-2004

JAMES D. CUNNINGHAM\*  
MARY ANN MORGAN  
JOSEPH E. BOATWRIGHT\*

OF COUNSEL  
JARED M. BILLINGS  
TRACY TROUTMAN CHEEK

\*BOARD CERTIFIED  
CIVIL TRIAL LAWYER

February 21, 2005

RECEIVED  
FEB 25 2005

Office of the General Counsel  
Ford Motor Company  
Parklane Towers West, Ste. 300  
Three Parklane Blvd.  
Dearborn, Michigan 48126-2568

VIA FACSIMILE - 313/248-7727

RE: Claim Number : Unknown  
Our Client : [REDACTED]  
Date/Accident : 08/21/04  
Type of Loss : Property Damage Claim

Dear Sir/Madam

This firm has been retained to represent Imagine Tour, Inc., d/b/a Imagine Cars, located at [REDACTED], Orlando, Florida in a claim for losses sustained as a result of a spontaneous fire from a defective 2001 Ford Expedition available at their dealership for sale. The incident in question occurred on August 21, 2004 at the above-stated address. Upon receipt of this letter, we ask that you assign this claim to an adjuster for handling.

Please consider this letter as our request pursuant to Florida Statute 627.4137, that within thirty (30) days, you provide us with a statement, under oath, of the following information with regard to each known policy of liability insurance, including excess or umbrella insurance:

- A. The name of the insurer;
- B. The name of each insured;
- C. The limits of liability coverage;
- D. A statement of any policy or coverage defense which said insurer reasonably believes is available to such insurer at the time of filing such statement.
- E. A copy of the insurance policy.

It is our understanding that you will have an investigator in the Central Florida area this week to investigate other fire losses. Please contact us if your investigator could examine this vehicle as well.

- 8/21/04  
- 01 Exped

February 21, 2005  
Page 2

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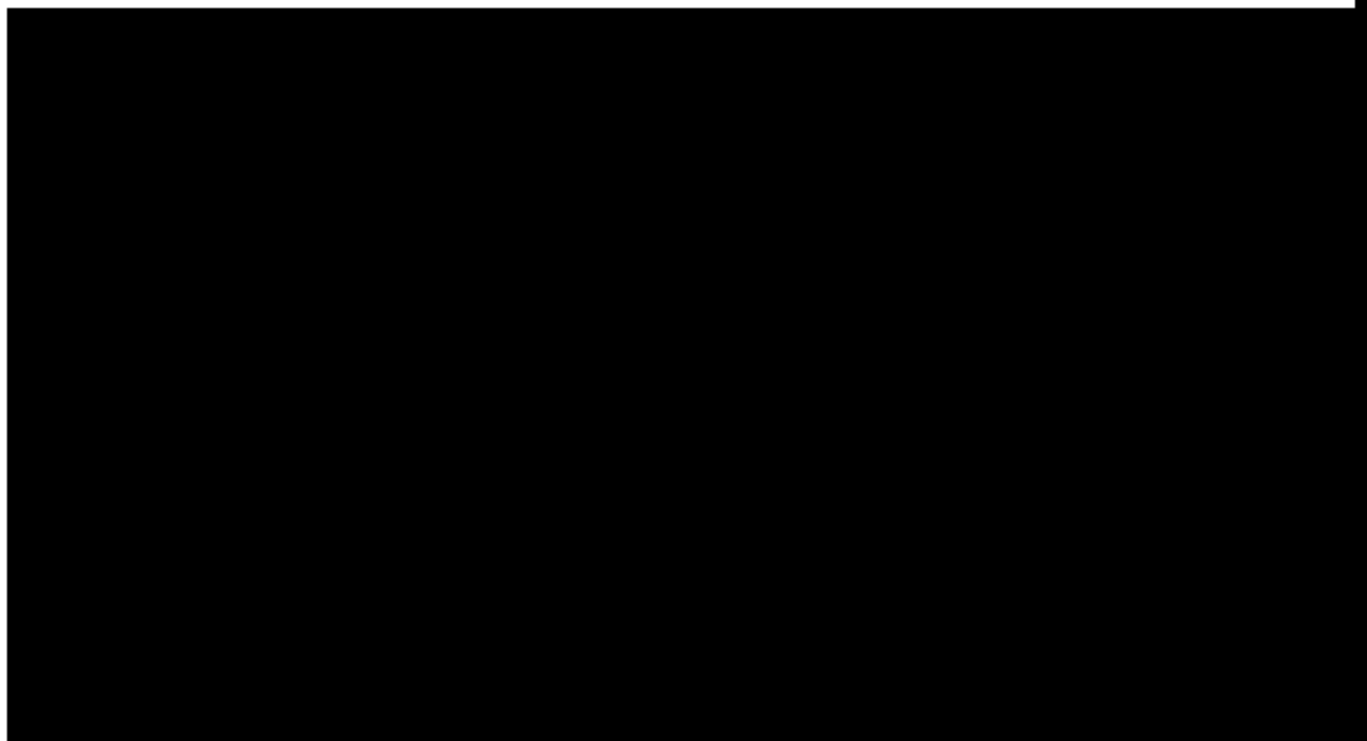
Thank you for your anticipated cooperation and assistance in regard to the above.

Sincerely,



Darylaine Hernandez

DH/sp  
cc: Kaan Orer



RECEIVED JAN 12 2005 OFFICE OF  
**ROBERT F. TACHER**  
3230 WEST COMMERCIAL BOULEVARD, SUITE 250  
FORT LAUDERDALE, FLORIDA 33309  
STAFF COUNSEL FOR ST. PAUL FIRE & MARINE INSURANCE COMPANY  
AND THE TRAVELERS INDEMNITY COMPANY AND THEIR PROPERTY  
CASUALTY AFFILIATES

TELEPHONE (954) 677-3700

ANTHONY J. ALONZETTI  
ASHY J. GOLDMAN  
HENRY L. KOSLER  
MEREDITH WIGLEARY KNOLL  
CARLOS M. LLORENTE  
MARIA A. MUDANO  
MARK A. PEDRICH

January 7, 2005

TELEFAX (954) 677-3710

RONALD L. RAFFOBY  
ADAM I. ROSS  
JOEL L. ROTH  
JEFFREY S. SANDLER  
TERRY M. SCHNEIDER  
ROBERT F. TACHER

CERTIFIED MAIL, RETURN RECEIPT

Ford Motor Company  
3 Parkland Blvd.  
Suite PTW 300  
Dearborn, MI 48126  
Attn: Shawn Norton

Re: THE PHOENIX INSURANCE COMPANY a/s/c [REDACTED] vs.

UNKNOWN

Car Fire located at: [REDACTED] Florida [REDACTED]

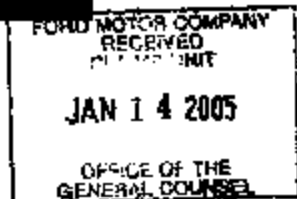
Date of Loss 11/23/04

Our File No. : 05-000-01

Our Claim # : [REDACTED]

Vehicle Involved in the fire: 2001 Ford Expedition

Vin # : 1SMRU15W81 [REDACTED]



Dear Ms. Norton:

The Phoenix Insurance Company has retained this office to assist in the investigation of the cause of a car fire located at the above address on the above date. In addition, we have scheduled a joint inspection with all interested parties for Tuesday, January 11, 2005 at 10 A.M. at the above location. We may be pursuing recovery of any losses sustained by and/or our Insured, JRT Investments, Inc., because of this loss.

You are hereby placed on formal written notice of this loss, and the fact that, if this matter cannot be amicably resolved, we may be instructed to pursue a subrogation action against any and all responsible parties.

**SHOULD UNKNOWN AND/OR UNKNOWN'S REPRESENTATIVE, EMPLOYEES, AGENTS, OR CARRIER HAVE POSSESSION OF ANY EVIDENCE RELEVANT TO THIS MATTER, WE INSTRUCT YOU NOT TO DISPOSE OF IT OR IN ANYWAY ALTER IT UNTIL WE HAVE HAD AN OPPORTUNITY TO INSPECT IT.**

**IF AT ANY TIME UNKNOWN AND/OR UNKNOWN'S REPRESENTATIVE, EMPLOYEES, AGENTS, OR CARRIER HAS ANY EVIDENCE THAT MAY RELATE TO A POSSIBLE CAUSE OF THIS FIRE, TO THE INVESTIGATION, OR TO THE VEHICLES OR PROPERTY INVOLVED IN THE FIRE, WE INSTRUCT YOU NOT TO**

Unknown  
January 6, 2005

**ALTER, DISPOSE OF, OR CHANGE THAT PROPERTY UNTIL WE HAVE HAD AN OPPORTUNITY TO INSPECT IT.**

With respect to the inspection of our insured's property, including the vehicle(s) involved, anyone interested will be allowed access to the property to photograph, and/or conduct a preliminary non-destructive investigation as to the cause of this fire.

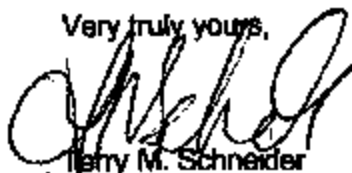
*Please forward a copy of this letter to your insurance carrier. Your carrier, or you if you do not have any insurance for this loss should contact us immediately. If you have insurance, please mail or fax us a copy of all insurance policy declaration sheets showing your coverage and the name of your carrier.*

As you may know, numerous vehicles were in the property in issue at the time of the fire. While we understand everyone's desire to retrieve their vehicles and any personal property that may be in those vehicles, the integrity of the fire scene is paramount. Therefore, we would prefer not to allow access to the property prior to our joint inspection. If you have some specific concerns or interests in getting into the property prior to that time, please contact at the above telephone number so that we may discuss this matter further.

**We have scheduled a joint inspection for Tuesday, January 11, 2005 at 10 A.M.** Please contact me upon receipt of this letter to verify your receipt of the letter and to verify we know whether you intend to participate in this inspection. As indicated above, if you have an insurance company involved in this matter, please immediately forward this letter to your insurance carrier. If you and/or your carrier intend to participate in the inspection, we will need the complete name, address, telephone number and job title of each person who intends to participate.

Thank you in advance for your cooperation. If you have questions, please feel free to contact me at the above telephone number.

Very truly yours,

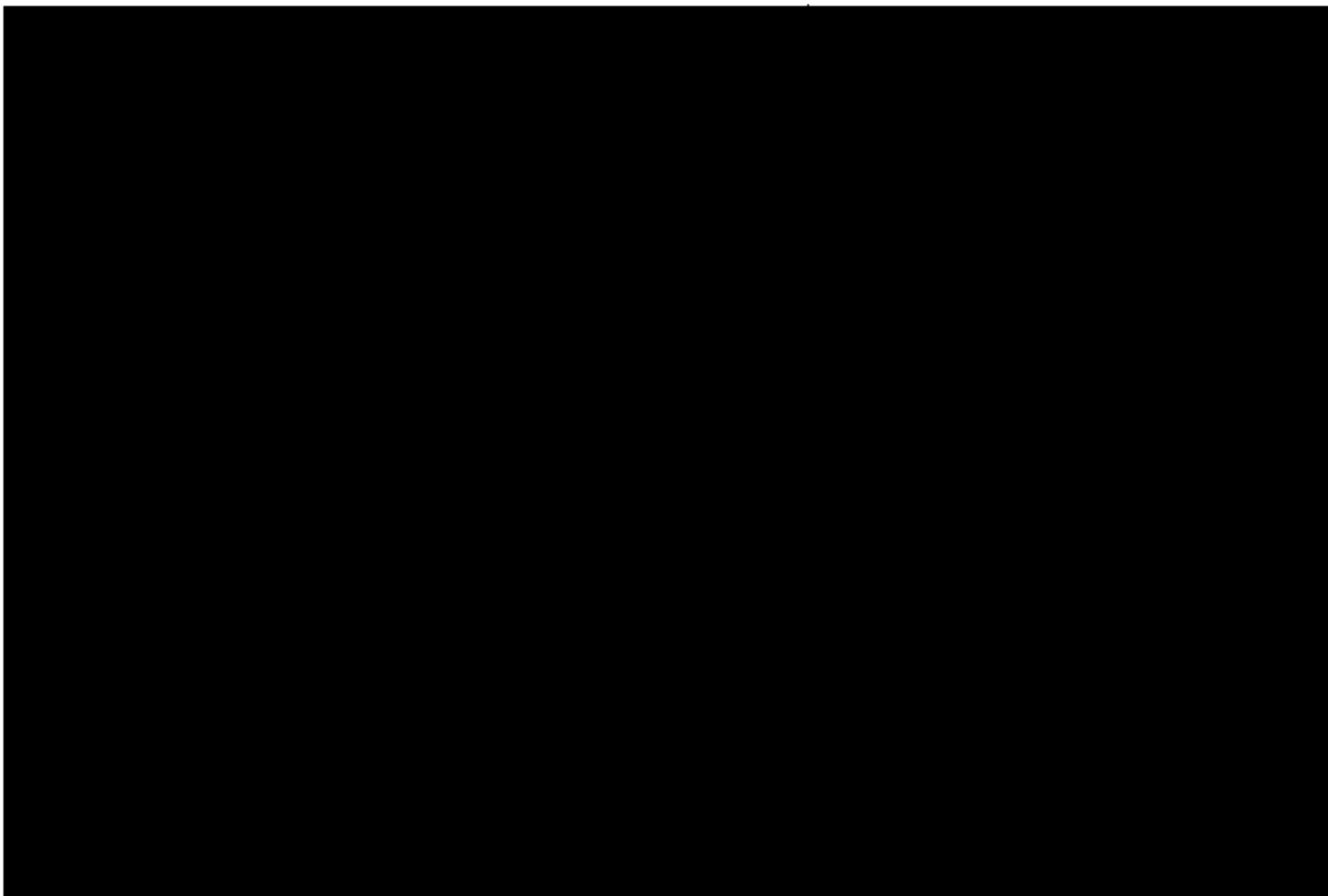


Terry M. Schneider

TMS/dtt

cc: Newell and Associates  
Cory Kopischke, Claim Representative

[Redacted header text]





RECEIVED

DEC 30 2004

Cory Kopischke  
PO BOX 2954  
MILWAUKEE, WI 53201-2954  
Phone: (800)624-6007 Ext 4742  
Fax: (866)280-7367

December 23, 2004

Attention: Legal Department  
Ford Motor Company  
Parkland Towers West #300  
Dearborn, MI 48126

*Called  
1/4/05*



Our Client: [REDACTED]  
Date of Loss: 11/23/2004  
Our File No.: ACF7255  
Estimated Damages: \$110,000.00

Dear Ford Motor Company,

The purpose of this letter is to place you on notice of this fire loss at the above location.

We are the insurance carrier for [REDACTED] Inc. and are in the process of investigating the cause of this fire. It has been alleged that the area of origin of the fire was a 2001 Ford Expedition. We have yet to determine the specific ignition source for this fire but anticipate sending an engineer to the scene in early January to examine in further detail.

We would like to offer you the opportunity to be present at this exam and suggest that you place your insurance carrier on notice of this as well as they may want to have a representative present as well.

Please call me immediately if you have any questions.

Sincerely,

Cory Kopischke  
Technical Specialist







- Government Employees Insurance Company
- GEICO General Insurance Company
- GEICO Indemnity Company
- GEICO Casualty Company
- Criterion Insurance Agency, Inc.  
(Colonial County Mutual Ins.)

1-800-841-3000

4301 Spring Valley Road, Dallas TX 75244-3694

CUSTOMER  
RELATIONSHIP  
CENTER

2005 FEB 22 1A 11:04

February 14, 2005

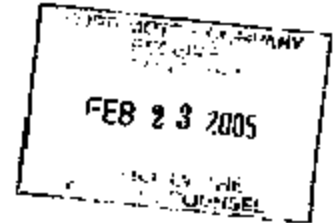
Ford Motor Credit  
Consumer Affairs Department  
AAMD - 3NE-B  
P.O. Box 6248  
Dearborn, MI 48126

RECEIVED

FEB 22 2005

Our Claim Number: [REDACTED]  
Our Insured: [REDACTED]  
Date of Loss: 08/18/2004  
VIN: 1FTRW07L51K [REDACTED]  
Year/Make/Model: 2001 FORD F150  
Damage: Fire - Total Loss

GEICO Amount	\$19,242.38
Less Salvage Recovery	- 3,667.00
Rental	None
Insured Deductible	500.00
Total Subrogation Amount	\$16,075.38



To Whom It May Concern:

We believe this claim was caused by the electrical problem in Ford vehicles detailed in your recall. This loss occurred because mechanical/manufacture failure.

This letter will serve as our notice of our payment recovery claim and constitutes a sincere effort to settle this claim as required by conditions precedent to arbitration as stated by the Automobile and Property Subrogation Arbitration Agreement.

If you have any further questions, please contact me at the number listed below.

Sincerely,

*R. Campbell*  
Ruby Campbell  
Payment Recovery Examiner  
800-841-5432 ext. 1642

- 3/18/04  
- 101 F150  
- VIN  
- \$ 17,792.38  
- WSP - 2/25/00  
- ESP - 9/24/04 84126



## All Action Details for Issue

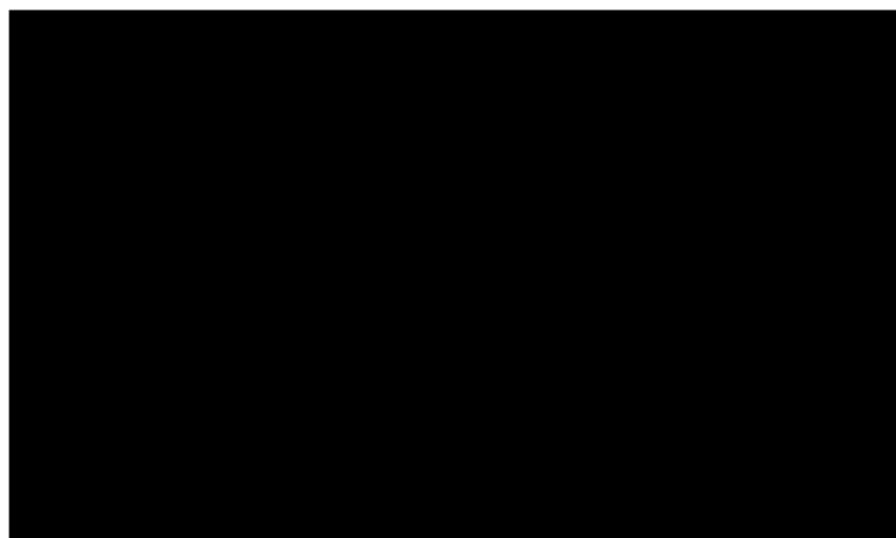
Print

VIN: 1FTZX17271N [REDACTED] Year: 2001 Model: F-SERIES Case: 588080845  
 Name: [REDACTED] Owner Status: Subsequent WSD: 2001-02-24  
 Symptom Desc: FIRE/SMOKE VISIBLE FLAME Primary Phone: [REDACTED]  
 Reason Desc: LEGAL - ACCIDENT / FIRE Secondary Phone: [REDACTED]  
 Issue Type: 10 OGC Issue Status: CLOSED

Action: CONTACT ADVANCED TO OGC  
 Dealer: 04544 RED MCCOMBS FORD Origin Desc: US CONCERN CASE BASE  
 Odometer: 117000 MI Comm Type: PHONE  
 Analyst Name: VOGRINCKO-MARTINEZ PAULA Analyst: FVOGRINC  
 Action Date: 04/04/2005 Action Time: 16:33:27.902 Action Data: No

Comments CUSTOMER SAID: VEH CAUGHT IN FIRE ON SATURDAY APRIL 2/05 DO NOT KNOW WHERE THE FIRE INITIATED  
 VEH IS AT THE PARKING LOT OF MY BUILDING POLICE REPORT INDICATES THAT FIRE ORIGINATED DUE A  
 DEFECT ARSON GAVE ME REPORT # 05-214813-01 DO NOT HAVE INSURANCE IN MY CAR CALLING FORD TO ASSUME  
 RESPONSABILITY FOR THE DAMAGES 2 OTHER VEHICLES WERE DAMAGED ON THE SIDE -2 APARTMENT WINDOWS  
 BROKE -ALSO THE PAINT OF THE BUILDING WAS DAMAGED SUPERINTENDENT ASKED ME TO SIGN A LETTER CLAIMING  
 RESPONSABILITY FOR THE DAMAGES IN THE BUILDING DEALER SAID: NONE CRC ADVISED: I WILL FORWARD THIS  
 INFORMATION TO THE FORD OGC DEPARTMENT. YOU WILL BE CONTACTED WITHIN 3-5 BUSINESS DAYS.

[REDACTED] 4/8/2005



FARM  
BUREAU

RECEIVED JAN 10 2005

**Georgia Farm Bureau Mutual Insurance Company**  
**Georgia Farm Bureau Casualty Insurance Company**

Paul McCahon, C.F.I.  
Senior Special Investigator  
P. O. Box 1345- Tifton, Georgia 31793  
Office 229-388-0500  
Fax: 229-388-0500

*New  
(for Shawn)*

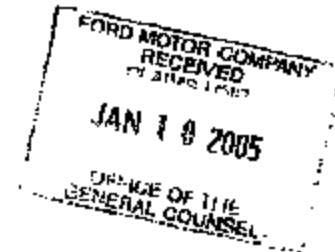
**Certified Mail - Return Receipt Requested**  
**Article Number: 7003 1010 0003 3168 0995**

January 7, 2005

Ms Shawn L. Norton  
Claims Analyst / Litigation Assistant  
Ford Motor Company  
300 Parklane Towers West  
Three Parklane Boulevard  
Dearborn, MI 48126

Fax: 313-845-4089

RE: Insured: [REDACTED]  
Policy No. [REDACTED]  
APV-0919375  
Date of Loss: 1/04/05



Dear Ms Norton:

This loss involves a 2001 F-150 truck VIN 1FTRX18L71[REDACTED] with 28,000 miles. The insured had last driven the vehicle around 4:30 p.m. At approximately 8:50 pm, he and his wife both heard a "pop" in the garage and their dog charged the garage door. They thought something was in the garage and went to investigate. When [REDACTED] opened the door, he discovered that his Ford truck was on fire. The fire was coming out of the left front fender well and between the hood and the windshield on the driver's side of the vehicle. He immediately used two fire extinguishers to no avail. He called 911 and then moved his wife's Chevrolet Tahoe out of the garage and tried to put the fire out with a garden hose, also to no avail. The fire quickly spread to the attic and subsequently destroyed his home. We have \$371,500 coverage on the house and \$185,750 on the contents.

I have taken a statement from [REDACTED] and I will forward it to you once it is transcribed along with a fire report. We have scheduled a detailed fire scene examination to take place on January 20<sup>th</sup> at the loss location which was also the insured's residence located at [REDACTED] Court in Valdosta, Georgia. The examination will begin at 9:00 a.m. This examination will involve debris removal, possible destructive testing and the subsequent removal of the vehicle from the scene to be stored at a salvage yard.

Ford Motor Company  
Page 2  
January 7, 2005

This letter is to give you notice of our intent to pursue subrogation against your company should we feel it is warranted and to give you an opportunity to be present during the examination of the fire scene and the vehicle

If you have any questions, please feel free to give me a call.

Sincerely



Paul McGahee, CFI  
Senior Special Investigator

PM/pm

cc: File





**PROGRESSIVE**

12700 Black Forest Lane, Suite 300  
Woodbridge, VA 22192  
Telephone: 703 730-4500  
Facsimile: 703 878-7107  
progressive.com

**RETURN RECEIPT REQUESTED CERTIFIED AND REGULAR MAIL**

**Ford Motor Company-Consumer Affairs**  
P.O. Box 6248  
MD-3NE-B  
Dearborn, MI 48126

RECEIVED  
FEB 08 2005

5  
FEB -7 3:50  
CONSUMER AFFAIRS  
SECTION

January 31, 2005

**RE: VEHICLE: 2001 Ford F150 Pickup**  
**VIN #: 2FTRX18W11C [REDACTED]**  
**OWNER: [REDACTED]**  
**OPERATOR: [REDACTED]**  
**DATE OF LOSS: January 15, 2005**  
**CLAIM #: 055219540**

FORD MOTOR COMPANY  
RECEIVED  
CLAIM UNIT  
FEB 9 9 2005  
OFFICE OF THE  
GENERAL COUNSEL

To whom it may concern:

I represent Progressive Insurance Company's Auto Fire / Auto Theft Unit. The above vehicle was involved in a fire of alleged unknown origin. The loss occurred in Arlington, Va.

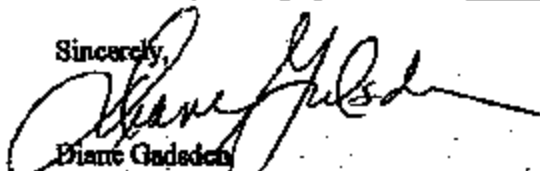
In order to determine the cause of fire, including a determination as to whether any defect in the vehicle was in existence at the time of the loss, a representative of ARC Investigators will conduct an inspection and testing of the vehicle. This inspection will take place at Springfield Towing 7901 Cinder Bed Rd, Lorton, Va 22079.

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

To coordinate the inspection date and time, please contact the undersigned at (703)730-4535.

Please note that if you choose not to participate in the inspection, you will forfeit any right to subsequently claim prejudice under Nally v. Volkswagen, Inc. 405 Mass 191 (1989).

Sincerely,

  
Diane Gadsden  
Fire/Theft Investigator



Friday, February 18, 2005

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

RECEIVED  
FEB 25 2005

Re: **PRODUCT DEFECT CAUSED VEHICLE FIRE AND RESULTING DAMAGES.**  
VIN: 1FTDX18W4V1 [REDACTED]  
Year: 1997  
Make: FORD  
Model: F150  
Our Insured: [REDACTED]  
Address: 4 [REDACTED] DRETFELD, PA [REDACTED]  
Phone No.: [REDACTED]  
Our Claim No.: [REDACTED]  
Date of Loss: 1-7-05  
Damages: \$ 9,795.66

RECEIVED  
FEB 25 2005

**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 \$9,795.66 to my attention, payable to "Progressive Casualty Insurance Company, as subrogee of [REDACTED]", and mail to my attention at [REDACTED] Richmond Hts., OH [REDACTED].

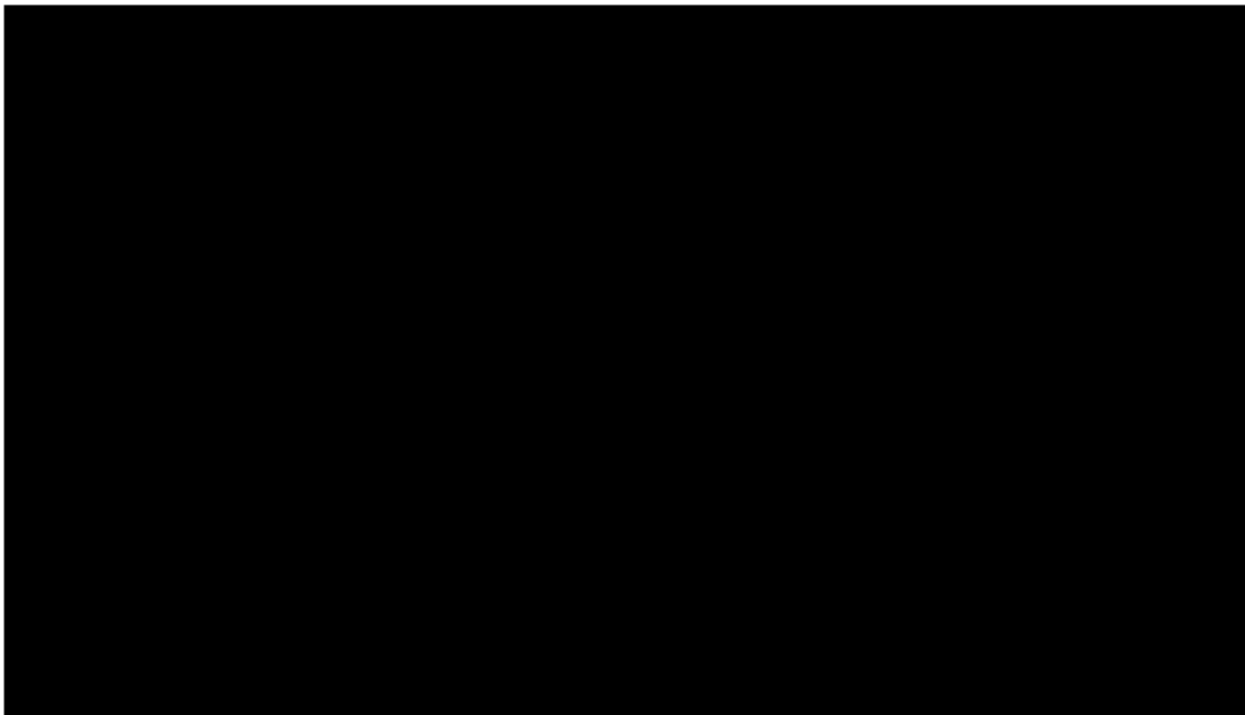
You can contact me at the number listed below should you need additional documentation or care to discuss this claim.

Thank you for your anticipated cooperation.

Progressive Casualty Insurance Company

William P. Kienz  
Subrogation Representative  
(440) 603-7967

- 1/7/05  
- 197 F150  
- VIN  
- \$9,795.66  
- WSD 3/11/07  
- ESP - NO



Date of Fire: 3-24-05  
Automobile: 1997 F-150 pick-up owned by Feliciano  
Location: Houston, Texas  
My Client: Farmers Insurance Group

Reyes

RECEIVED MAR 29 2005

Dear Sirs:

I represent Farmers Insurance Group. They insured [redacted] home in Houston, Texas. On March 24, 2005, we suspect [redacted] Ford pick-up ignited in the garage destroying itself [redacted] home, and his neighbor's home. We believe the damages will be over \$100,000.00. The home and pick-up is in Houston, Texas and we are doing our very best to preserve the premises for your inspection. However, time is of the essence. If it is your interest to inspect the scene and the evidence prior to removal of the remnants of the Ford pick-up, you must contact me immediately. I will then make arrangements for your inspection in Houston, Texas.

Sincerely,

Sarah Thompson, Secretary to  
Russell G. Little

*New  
(For Shawn)*

FORD MOTOR COMPANY  
MAR 30 2005  
OFFICE OF THE  
GENERAL COUNSEL

3/30/2005

ER05-005-LC1-2814



RECEIVED

FEB 17 2005

BEGINNING OF CONTACT  
02/16/2005

VOICE OF THE CUSTOMER TRACKING SYSTEM

19.15.03

REGION: 52 SOUTHWEST	OGC ISSUE	CASE NBR:	0436960395	
VIN: 1FTZF1760W	ZONE: A3	OPENED:	02/08/2005	
	ENGINE: 6	VEH TYPE: T	CLOSED:	02/08/2005

LAST NAME:		FIRST NAME:		STATUS:	CLOSED
TITLE:				MI:	
ADDRESS:		STATE:	TX	ZIP:	
CITY:		MODEL:	F150 4X2 STYLE/IDE PICKUP		
HOME PHONE:		MILEAGE:	100000		
MODEL YEAR:	1998	DEALER NAME:	NORTH CENTRAL FORD	SALES CODE:	F52017
REASON CODE:	0782 LEGAL - ACCIDENT / FIRE	P & A:	04212		
SYMPTOMS:	704145 FIRE/SMOKE VISIBLE FLAME UNDERHOOD				

ORIGIN: CAG138 - US CONCERN CASE BASE COMMUNICATION: PHONE  
 ACTION: 705 - CONTACT ADVANCED TO OGC  
 DOCUMENT: ANALYST: DCHONG2 CHONG DAMIEN

DATE: 02/08/2005 TIME: 12.08.18:  
 ACTION DATA/COMMENTS:

CUSTOMER SAID: -I AM NOT SURE OF THE MILEAGE, BUT IT WAS IN THE HIGH 100000 MILES.-I HAD JUST PUT NEW TIRES ON IT.-ON FEBRUARY 2, 10:45 PM LAST WEDNESDAY THE VEH CAUGHT ON FIRE, IT BURNED, IT IS TOTALLY DESTROYED.-THE FIRE STARTED UNDER THE HOOD.-THE CRUISE CONTROL WAS OFF.-I DO NOT KNOW WHAT CAUSED THE FIRE.-THE VEH WAS AT AN APARTMENT COMPLEX PARKING LOT, THE FIRE ALSO DAMAGED THE 2 CARS BESIDE MY VEH.-IT ALSO DESTROYED THE AWNING IS WAS UNDER.-WE HAVE PICTURES OF THE FLAMES.-NO POLICE REPORT WAS FILED.-A FIRE REPORT WAS FILED, NUMBER IS 05-1334.-I HAVE INFORMED MY INSURANCE COMPANY, THEY HAVE THE VEH.-THERE WAS NO INJURIES.-I AM WILLING TO BUY ANOTHER FORD, DEPENDING ON WHAT FORD DOES ABOUT THIS ISSUE. DEALER SAID: -NONECRC ADVISED: I WILL FORWARD THIS INFORMATION TO THE FORD OGC DEPARTMENT. YOU WILL BE CONTACTED WITHIN 3-5 BUSINESS DAYS.

FORD MOTOR COMPANY  
 RECEIVED  
 CLARENCE UNIT  
 FEB 17 2005  
 OFFICE OF THE  
 GENERAL COUNSEL

CONSUMER AFFAIRS

02/16/2006 FAXIGIN





**PROGRESSIVE**

**CONSUMER AFFAIRS  
SECTION**

3421 Concord Road  
York, PA 17402  
Telephone: 717 840-3800  
Facsimile: 717 751-0811  
progressive.com

February 04, 2005

5 FEB -8 P3:41

**Ford Motor Company  
Customer Relations Department  
PO Box 6248  
Dearborn, MI 48126**

RECEIVED  
FEB 10 2005

Our Claim Number: [REDACTED]  
Date of Loss: January 31, 2005  
Location of Loss: Narvon, PA  
Vehicle: 2001 Ford F150 VIN: 1FTRX18L61N [REDACTED]

Our investigation indicates that the above listed fire loss to the insured vehicle was a result of a recall issue and therefore you are responsible for this loss. We have been called upon to make payment under our insured's policy. We are placing you on notice of our subrogation interests.

The subrogation on this file will be handled by our Subrogation Unit. They can be contacted by calling 1-800-260-3540. All correspondence regarding this subrogation claim should be addressed to:

**Progressive Companies  
Attn: Subrogation  
6055 Parkland Blvd. Box EM 3  
Mayfield Heights, OH 44124**

**Progressive Insurance**

**Shawn P. Malloy  
Fire/Theft Investigator**

FORD MOTOR COMPANY  
RECEIVED  
CLAIMS UNIT  
FEB 11 2005  
OFFICE OF THE  
GENERAL COUNSEL

- 4/31/05  
- 101 F-150  
- van  
- WSD - 5/21/01  
- 60060/15000





## All Action Details for Issue

Print

VIN: 1FTZF17261 [REDACTED] Year: 2001 Model: F-SERIES Case: 1470270175  
 Name: [REDACTED] Owner Status: Subsequent WSD: 2001-04-28  
 Symptom Desc: FIRE/SMOKE VISIBLE FLAME UNDERHOOD Primary Phone: [REDACTED]  
 Reason Desc: LEGAL - ACCIDENT / FIRE Secondary Phone: [REDACTED]  
 Issue Type: 10 OGC Issue Status: CLOSED

Action: CONTACT ADVANCED TO OGC  
 Dealer: 04993 BRANDON FORD Origin Desc: US CONCERN CASE BASE  
 Odometer: 43000 MI Comm Type: PHONE  
 Analyst Name: MARIANA ANESETTI Analyst: MANESETT  
 Action Date: 01/17/2005 Action Time: 13.03.46.646 Action Data: No

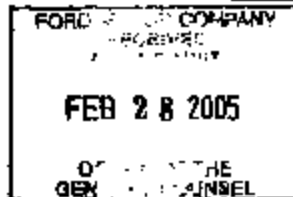
Comments VLG078UCUSTOMER SAID: DATE OF FIRE :FRIDAY JAN 7 05.LOCATION : IN CUST DRIVEWAY NO INJURIESVEH WAS TOTALED FIRE DEPT WAS CONTACTED AND THEY CAME OUT TO PUT OUT FIRE.CUST HAS A FIRE REPORT # 05-01248THERE WAS STRUCTURAL DAME TO HIS HOME ABOUT \$8000 WORTH CUST WANTS TO KNOW WHAT FORD WILL DO.DEALER SAID: -NONE-CRC ADVISED: I WILL FORWARD THIS INFORMATION TO THE FORD OGC DEPARTMENT. YOU WILL BE CONTACTED WITHIN 3-5 BUSINESS DAYS.

1/27/2005



Thursday, February 24, 2005

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



RECEIVED  
FEB 28 2005

Re: PRODUCT DEFECT CAUSED VEHICLE FIRE AND RESULTING DAMAGES.

VIN: 1FTRW07W01K [REDACTED]  
Year: 2001  
Make: FORD  
Model: F-150  
Our Insured: [REDACTED]  
Address: [REDACTED] HUDSON, FL [REDACTED]  
Phone No.: [REDACTED]  
Our Claim No.: [REDACTED]  
Date of Loss: 1-8-05  
Damages: \$ 14,169.63

*Shawn*

**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 \$14,169.63 to my attention, payable to "Progressive Auto Pro Insurance Company, as subrogee of [REDACTED] and mail to my attention at PO Box 43258, Richmond Hts., OH 44143.

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 Auto Pro Insurance Company

William P. Kierul  
Subrogation Representative  
(440) 603-7967

- 1/8/05  
- \$ 14,169.63  
- 01 F-150  
- WSD 3/22/01  
- ESP-ND