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A PROFESSIONAL CORPORATION

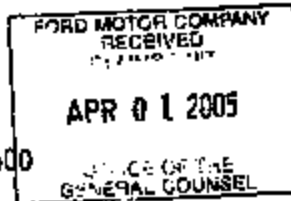
SUITE 2200 SUNTRUST PLAZA 303 PEACHTREE STREET, NE ATLANTA, GA 30309-3284
404.572.2000 800.690.1393 404.572.2199 FAX www.cozen.com

Kareg D. Foltz
kfoltz@cozen.com

March 31, 2005

VIA FACSIMILE (313) 390-2107
& FEDERAL EXPRESS

Ms. Jessie Hollingsworth
Claims Analyst
Ford Motor Company
Parklane Towers West Suite 400
Three Parklane Blvd.
Dearborn, MI 48126-2567



RE: Insured : [REDACTED]
Date of Loss : 3/26/05
Loss Location : [REDACTED]
 : Powder Springs, GA
Claim No. : [REDACTED]
Our File No. : Pending

Dear Jessie:

This letter is to advise you that an investigation into a fire which substantially destroyed [REDACTED] home in Powder Springs, Georgia on March 26, 2005, indicates that a defect in a 1995 Ford F-150 parked in the drive-way of the home caused the fire. Damages have been estimated to exceed \$100,000.00.

The truck has been identified as 2FTDF15Y7SC [REDACTED] and was owned by Antonio Chico. The truck is currently located at the fire scene. This letter is to further advise you that the truck and the scene is being preserved for the next ten (10) days. Within that period of time, we intend to conduct an inspection of the vehicle and remove it from the premises. Please contact me if you intend to send a representative to investigate the vehicle and be present for the inspection. You may also want to advise your insurance carrier of this loss.

ATLANTA(157484)

Ms. Jessie Hollingsworth
Claims Analyst
Ford Motor Company
March 31, 2005
Page 2

Please note that to protect the interest of our clients, we may need to file suit in this matter before the end of April 2005. Please have your representative coordinate the investigation of the vehicle with my office as soon as possible.

Sincerely,

COZEN AND O'CONNOR


BY: KAREN D. FULTZ

KDF/tr

ATLANTA1074801



State Farm Insurance Companies®



August 19, 2004

4229 Hwy. 52 N.
Rochester, MN 55901-4188
Phone: (507) 280-2100

ATTN SHAWN NORTON
FORD MOTOR COMPANY
OFFICE OF THE GENERAL COUNSEL
THREE PARKLANE BOULEVARD - STE 300
DEARBORN MI 48126-2588

RE: Your File Reference [REDACTED] (Insured by Met Life)
Our Insured: [REDACTED]
Our Claim Number: 23-L218-345
Date of Loss: December 7, 2003
Amount of Loss: \$2,880.44

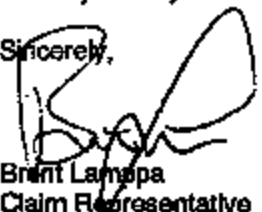
RECEIVED AUG 24 2004

Dear Mr. Norton:

Please be advised [REDACTED] suffered damages to their home and property in the amount of \$2,880.44, as a result of a fire on December 7, 2003. We have the understanding the fire started inside Richard Barth's 2001 Ford F150 pickup truck. We understand you are handling the file for Ford Motor Company at this time. We are writing to you to put you on notice of our subrogation claim. Once you receive this letter and have had a chance to review, please contact me.

Thank you for your cooperation.

Sincerely,


Brent Lamopa
Claim Representative
(507) 280-2153
State Farm Fire and Casualty Company

BL/511/0819001.27

related to Barth





UNIVERSAL UNDERWRITERS GROUP

REGIONAL OFFICE—1900 Summit Tower Boulevard, Suite 220 • Orlando, Florida 32810

MEMBER COMPANIES

UNIVERSAL UNDERWRITERS INSURANCE COMPANY
UNIVERSAL UNDERWRITERS SERVICE CORPORATION
UNIVERSAL UNDERWRITERS ACCEPTANCE CORPORATION
UNIVERSAL UNDERWRITERS INSURANCE SERVICES OF TEXAS, INC.

UNIVERSAL UNDERWRITERS LIFE INSURANCE COMPANY
UNIVERSAL UNDERWRITERS OF TEXAS INSURANCE COMPANY
UNIVERSAL UNDERWRITERS INSURANCE SERVICES, INC.
UNIVERSAL UNDERWRITERS INSURANCE SERVICES OF ALABAMA, INC.

February 10, 2005

Ford Motor Company
Attn: General Counsel
P.O. Box 6248
Dearborn, MI 48126

RECEIVED
FEB 15 2005

SECTION
FEB 14 P2:30
CLAIMS AFFAIRS

CERTIFIED MAIL: 7002 1000 0004 9924 5924

FORD MOTOR COMPANY
RECEIVED
FEB 16 2005
GENERAL COUNSEL

Re: Our Insured [REDACTED]
Claim Number [REDACTED]
Claimant [REDACTED]
Date/loss : 1-12-05

Dear Sir or Madam:

This letter is to put you on notice of our intention to tender or to seek contribution from Ford Motor Company on the above captioned claim. On January 12, 2005 a 2001 Ford Expedition VIN1FMR417W91 [REDACTED] caught fire in the middle of the night while parked in the garage of [REDACTED]. The resulting fire destroyed the vehicle and the house of [REDACTED]. In addition two of the residents of the house suffered injuries in the fire.

We have been contacted by an attorney, Ms Darylaine Hernandez of the firm Billings Cunningham, Morgan and Boatwright who represent the injured parties. We have learned that the claimant, [REDACTED], age [REDACTED] has sustained burns to her legs from the fire. [REDACTED] suffers from smoke inhalation. Their house which was a total loss was uninsured.

Pursuant of Florida Statute 627.4137 this office hereby requests that within thirty (30) days you provide us with a statement under oath of a corporate officer superintendent of your claims manager, setting forth the following information with regard to each known policy of insurance, including excess or umbrella insurance.

- a. The name of the insurer.
- b. The name of each insured.
- c. The limits of coverage.
- d. A statement on any policy or coverage defense which such insurer reasonably believes is available to such insurer at the time of filing such statement.
- e. A copy of the policy(s).

Upon receipt of this letter please call this office to discuss this matter. Thank you in advance to your prompt attention to this request. I can be reached at 407-667-3339 from 8:00 am to 3:30 pm, Monday through Friday.

Sincerely,

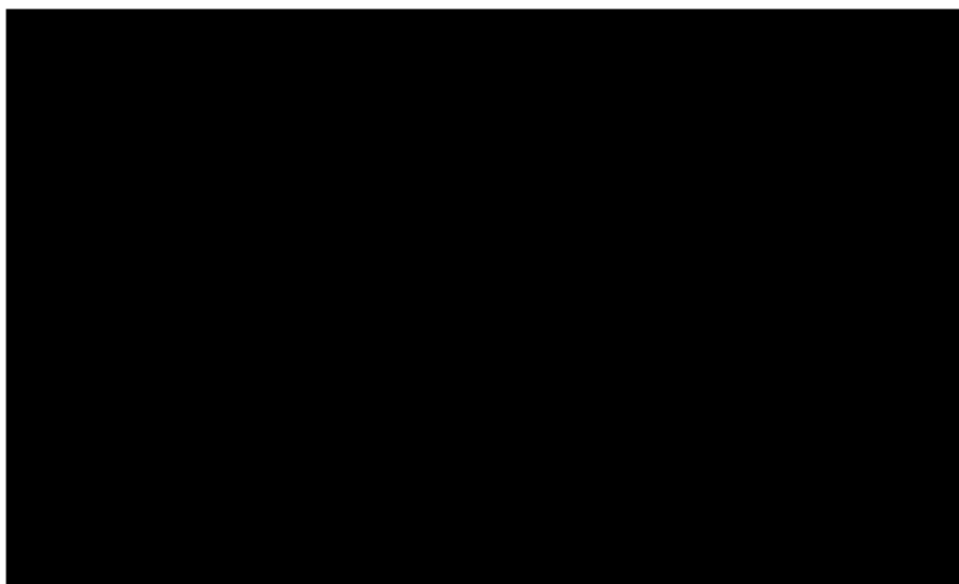


Ed Gillem

Claims Specialist

Direct Line (407) 667-3322

3339



Abraham & Agnoli

Attorneys at Law

A partnership of professional associations

Amy Agnoli
Lane Abraham
Joseph P. Frederick, III
of counsel

Tel: 305-285-8822
Fax: 305-285-1662
Toll Free: 877-623-6585

March 17, 2005

Francis M. McDonald, Jr., Esq.
Scott A. Richman, Esq.
Carlton, Fields, PA
250 South Orange Avenue, Ste. 500
Orlando, FL 32801

VIA FACSIMILE
407-849-0300

Re: Your client: Ford Motor Company
Our Client: [REDACTED]
Date of loss: 11/24/04
Location of incident: Permat Body Shop & Repair
[REDACTED]
Hialeah Gardens, FL [REDACTED]

To whom it may concern:

Please be advised that we represent [REDACTED] in a claim for property damage which was sustained as a result of a fire incident at Permat Body Shop & Repair in Miami-Dade County, Florida.

Kindly contact our office to discuss our client's property damage claim.

Respectfully,


LANE ABRAHAM, ESQ.
For the Firm

2701 South Bayshore Drive, Suite 403 - Coconut Grove, Florida 33133



RECEIVED APR - 7 2005

New

Law Offices
GROTEFELD & DENENBERG, LLC

8181 W. Broward Boulevard
Suite 300
Plantation, Florida 33324

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

Donna Waters Romero
Attorney at Law
dwr@gd-dl.com

Telephone: (954) 916-4780
Facsimile: (954) 916-4783

April 6, 2005

Called 4/7/05

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]
Address of Loss: [Redacted] *Niceville, FL*
Claim No.: [Redacted]
Date of Loss: *03/31/2005*

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 1999 Ford Expedition, Vin # 1FMRU1762X [Redacted].

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.

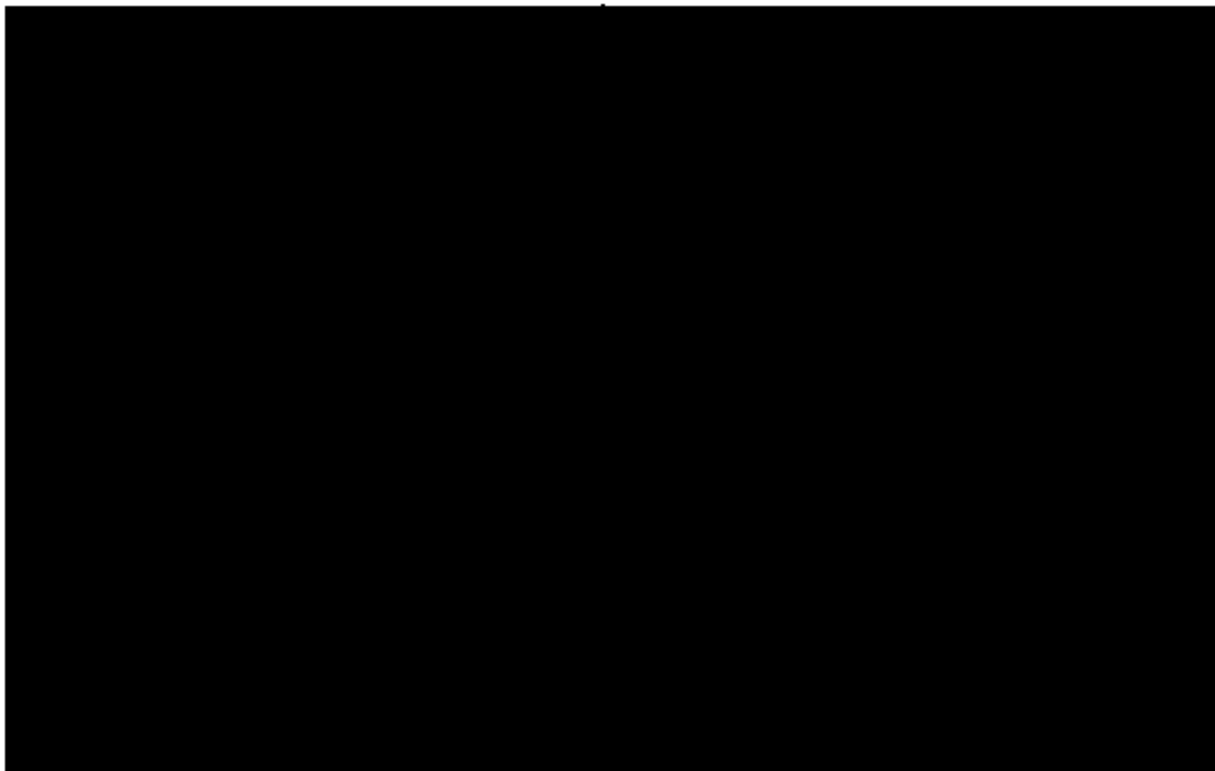
Very truly yours,

GROTEFELD & DENENBERG, LLC
[Signature]
DONNA WATERS ROMERO
For the Firm

*0781 #

DWR/jah
cc: Cindy Haley DeGeorge (via email)
Jim Phillips (via email)
Mary Callihan (via email)

42208



KEMP LYDICK

Attorneys and Counselors

Campbell Centre II, Suite 600
8150 North Central Expressway
Dallas, Texas 75206

Telephone 214.987.0003
Fax 214.987.0182

www.kemplydick.com
www.kemplydick.com

RECEIVED JAN - 4 2005

*New
(for Shawn)*

Called 1/4/05

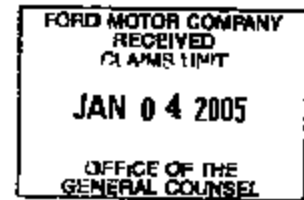
David O. Kemp
David O. Kemp, J.D., LL.M.

dkemp@kemplydick.com

January 3, 2005

Via Facsimile 313.843.4089

Ms. Shawn Norton, Claims Analyst
Ford Motor Company
Parklane Towers West, Suite 1500
Dearborn, Michigan 48126-2568



Re: Company :	Shelter Mutual Insurance Company
Our Claim Number :	[REDACTED]
Our Insured :	[REDACTED]
	Executor
Loss Location :	[REDACTED]
	Conway, AR [REDACTED]
Date of Loss :	09/01/2004
Vehicle I.D. :	1997 Ford F 150 Truck
Our File Number :	70000.001 Andrew Isaacs Estate

Dear Ms. Norton:

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

My understanding of the facts to date are as follows The subject Ford F 150 Pickup Truck was parked in the garage at the loss location on September 1, 2004 when it caught fire and damaged the subject residence. A cause and origin investigation was performed and the cause of the fire was determined to be the subject Ford F 150 pick-up.

The damages in this case are currently \$76,500.00. We reserve the right to assert a claim for the full damages our clients have and will suffer as a result of the defects and failure of the subject vehicle, asserted herein, and your acts of omission and/or commission

against our clients. Accordingly, the purpose of this letter is to provide you with formal notice of our client's claim against you and to provide you with opportunity to resolve the claim in a fair and equitable manner without need for further legal action.

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. As you well know, the homeowner is eager to begin repairs to the residence as soon as possible so it will be necessary for Ford to examine the vehicle and fire scene within the next two weeks. 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 January 19, 2005 and will make the premises and vehicle available for you or your insurer's non-destructive inspection up to and including July 19, 2005. Please call me at 214.987.0403 ext. 1 to arrange such inspection. One of our representatives will want to be available. After January 19, 2005 such repairs will commence. If you or your insurance company need additional time to inspect the residence in its present condition, beyond January 19, 2005, then notify me in writing as soon as possible.

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. If I do not hear from you within twenty (20) days from your inspection or within thirty days from the receipt of this notice, if you elect not to inspect the fire scene and evidence, I will assume the claim to be valid and will proceed in accordance with that assumption. Your failure to so respond will necessitate our filing suit in this matter.

We look forward to your prompt response.

Sincerely,

David O. Kemp

David O. Kemp
w/Perini
WET

DOK:wet



All Action Details for Issue

Print

VIN: 1FTEX17L4V[REDACTED] Year: 1997 Model: F-SERIES Case: 558280355
 Name: [REDACTED] Owner Status: Subsequent WSD: 1997-01-15
 Symptom Desc: Primary Phone: [REDACTED]
 Reason Desc: CORRESPONDENCE - WORK IN PROGRESS Secondary Phone:
 Issue Type: 02 INFORMATION Issue Status: CLOSED

Action: EMAIL - WIP - SCHEDULED CALL BACK
 Dealer: Origin Desc: MANUAL - EMAIL
 Odometer: Comm Type: PHONE
 Analyst Name: NATASHA MARCELL Analyst: NMARCEL2
 Action Date: 02/04/2005 Action Time: 15:27:05.870 Action Date: No

Comments: CUSTOMER SAYS: EMAIL-2/03/2005 1:35:27 PM-1324307 -IS THERE A PROBLEM WITH OTHER F-150'S CATCHING ON FIRE-MY VEHICLE CAUGHT ON FIRE FOR NO REASON BACK IN 2002--WE HAD EXTENSIVE DAMAGE TO OUR GARAGE AND BOAT- PER CUSTOMER, DEALER SAYS:

Action: EMAIL - MADE CONTACT - FOLLOW UP REQUIRED
 Dealer: 06744 HASTINGS FORD, INC. Origin Desc: MANUAL - EMAIL
 Odometer: Comm Type: EMAIL
 Analyst Name: SPILLANE YENNA Analyst: YSPILLAN
 Action Date: 02/19/2005 Action Time: 14:04:06.980 Action Date: No

Comments: CUSTOMER SAYS: PER CUSTOMER, DEALER SAYS: CAC ADVISED: ADDED MAC AS PER REP DOING OBC'S

All Action Details for Issue

Print

VIN: 1FTEX17L4VN	Year: 1997	Model: F-SERIES	Case: 556260355
Name: MR	Owner Status: Subsequent	WSD: 1997-01-15	
Symptom Desc: FIRE/SMOKE VISIBLE FLAME		Primary Phone:	
Reason Desc: LEGAL - ACCIDENT / FIRE		Secondary Phone:	
Issue Type: 30 OGC	Issue Status: CLOSED		

Action: CONTACT ADVANCED TO OGC

Dealer: 06744 HASTINGS FORD, INC.

Origin Desc: US CONCERN CASE BASE

Odometer: 1 MI

Come Type: PHONE

Analyst Name: BAINES ASHA

Analyst: ABAINES2

Action Date: 02/09/2005

Action Time: 11.53.12.856

Action Data: No

Comments: CUSTOMER SAID - CUST STATES THAT THE VEH CAUGHT FIRE FOR NO APPARENT REASON SEPT 02- STATES THAT THE FIRE STARTED IN HER YARD AND BURNED UP PART OF THERE GARGE AND BART OF THERE BOAT WHICH WAS FIXED SINCE- STATES THAT THE INSURANCE CO. ASSIGNED BALM TO THE VEH'S TOWING PACKAGE AS BEING THE CAUSE OF THE FIRE... THEY SAY THERE WAS A SHORT- STATES THAT THE VEH WAS WRITTEN OFF- STATES THAT SHE HAS PICTURES THAT CAN BE FORWARDED IF REQUIRED- THERE WAS NO POLICE REPORT BUT THERE WAS A FIRE MARSHAL REPORT THAT SHE HAS PAPERWORK FOR IS REQUIRED- STATES THAT THAT THEY DID FILE A INSURANCE CLAIM- CUST STATES THAT SHE REALLY ISNT LOOKING FOR ANYTHING OTHER THEN EXPLANATION AND IF FORD IS AWARE OF MIGHT HAVE HAPPENED CAUSE THEY HAVE HAD OTHER REPORTS OF THIS IYPE OF ISSUE THEYD LIKE TO BE MADE AWARE- STATES THAT HER HOUSEHOLD OWNS A CARPET CLEANING BUSINESS SO THERE EQUIPMENT AND THE VEH WERE ALL LOST IN THE FIRE DEALER SAID: HASTINGS FORD INC 3013 E 10TH ST GREENVILLE, NC 27858 DISTANCE: 17.74 MILESTEL: (252) 758-0114 CRC ADVISED: I WILL FORWARD THIS INFORMATION TO THE FORD OGC DEPARTMENT, YOU WILL BE CONTACTED WITHIN 3-5 BUSINESS DAYS. **ADV3 CUST THAT THERE WERE NO RECALLS AND OR FSAs ON THE VEH THAT I CAN SEE HAD THE SAME ISSUES/SYMP TOMS INWHCIH SHE HAD ..FIRE SMOKE ECT.

?Action=ActionList... 2/24/2005



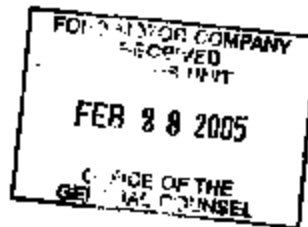
State Farm Insurance Companies®



February 17, 2005

PO Box 8613
Winter Haven, FL 33883-8613
800 301 7350

FORD MOTOR COMPANY
PARKLANE TOWERS W STE 400
3 PARKLANE BLVD
DEARBORN MI 48126-2568



RECEIVED
FEB 28 2005

RE: Claim Number [REDACTED]
Our Insureds: [REDACTED]
Vehicle: 1998 Ford Pickup
VIN Number: 1FTZX17W3WH [REDACTED]
Date of Loss: February 5, 2005

Dear Ford Motor Company:

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 me at 1 (800) 301-7350, Extension 8565 within 10 days to set up a time for your inspection. Should we not hear from you within this time, we will assume that you do not wish to inspect the vehicle.

Sincerely,

A handwritten signature in black ink, appearing to read "Mattie Butler-Link".

Mattie Butler-Link
Claim Representative
800 01 7350 Ext. 8565
State Farm Mutual Automobile Insurance Company

255/0217028FL

HOME OFFICES: BLOOMINGTON, ILLINOIS 61710-0001

ER05-005-LC1-2834

Date	Origin	Description	Action List
02/18/05	CAC138	CB-ADVISE CUST WE WILL NOTIFY THE DEPT SOMEBODY WILL BE IN TOUCH	

EP05-005-1-C1-2638



Action Detail

VIN: 1ETZU7W3W	Year: 1998	Model: F-SERIES	Case: 763142518
Name: [REDACTED]	Owner Status: Original	WSD: 1998-06-27	
Symptom Desc: FIRE/SMOKE VISIBLE FLAME UNDERHOOD		Primary Phone: [REDACTED]	
Reason Desc: LEGAL - CUSTOMER WAITING FOR ACKNOW		Secondary Phone: [REDACTED]	
Issue Type: 02 INFORMATION	Issue Status: CLOSED	Dealer: FORD OF OCALA INC	
Origin Desc: LIS CONCERN CASE BASE		P & A Code: 02885	
Action Desc: CB-ADVISE CUST WE WILL NOTIFY THE DEPT SOMEBODY WILL BE IN TOUCH			
Odometer: 8000 MI	Comm Type: PHONE		
Action Date: 02/18/2005	Action Time: 10:19:07:750	Action Date: No	
Analyst Name: GUERRERO JOSELITO	Analyst: JGUERR24		

COMMENTS: CUSTOMER SAID: = HE CALLED SATURDAY, VEH CAUGHT ON FIRE= HE WAS TOLD SOMEONE WILL CALL HIM BACK= UNTIL NOW HE HAVE NOT HEARD FROM FORDDEALER SAID: NONECRG ADVISED: THANK YOU FOR PROVIDING US WITH THIS INFORMATION IN RELATION TO YOUR CASE. I WILL FORWARD THIS TO OUR CONSUMER AFFAIRS DEPARTMENT, AND I HAVE REQUESTED THAT THEY CONTACT YOU WITHIN TWO BUSINESS DAYS.

E985-005-LC1-2836

Action List

Date	Origin	Description
02/05/05	CAGI38	ADVISE CUST INFORMATION WILL BE SENT TO CONSUMER AFFAIRS - FIRE
02/06/05	CALGL	SEND ACKNOWLEDGEMENT LETTER TO CUSTOMER
02/06/05	CALGL	CLOSING COMMENTS - DENIAL - BASED ON LITIGATION PREVENTION REVIEW

ENR05-005-LC1-2837

Action Detail

VIN: 1FTZX17W3WN	Year: 1998	Model: F-SERIES	Case: 783142518
Name:	Owner Status: Original	WSD: 1998-08-27	
Symptom Desc: FIRE/SMOKE VISIBLE FLAME UNDERHOOD		Primary Phone:	
Reason Desc: LEGAL - ACCIDENT / FIRE		Secondary Phone:	
Issue Type: 07 LEGAL	Issue Status: CLOSED	Dealer: FORD OF OCALA INC	
Origin Desc: US CONCERN CASE BASE		P & A Code: 02985	
Action Desc: ADVISE CUST INFORMATION WILL BE SENT TO CONSUMER AFFAIRS - FIRE			
Odometer: 90000 MI	Comm Type: PHONE		
Action Date: 02/05/2005	Action Time: 16:16:05:883	Action Date: No	
Analyst Name: KAREN DENNEY	Analyst: K DENNEY		

COMMENTS: CUSTOMER SAID: - THE VEH CAUGHT ON FIRE- VEH WAS PARKED IN CUST'S DRIVEWAY- THE FIRE WAS UNDER THE HOOD- NO DAMAGE TO DWELLING- THE FIRE OCCURRED TODAY- FIRE DEPARTMENT CAME TO THE SCENE- THEY FILLED OUT A REPORT- CUST IS NOT SURE WHAT THE FINDINGS ARE- CUST HAS SPOKE WITH INS. CO BUT HAS NOT YET FILED A COMPLAINT DEALER SAID: FORD OF OCALA INC 34475 TEL: (352) 732-4800- CUST SPOKE WITH SOMEONE AT THE DLRSHP WHO ADVISED CUST TO CONTACT CRC AND LODGE COMPLAINT ABOUT THE FIRE CRC ADVISED: - I WILL FORWARD THIS INFORMATION TO OUR CONSUMER AFFAIRS GROUP. SOMEBODY FROM CONSUMER AFFAIRS WILL CONTACT YOU IN 2 BUSINESS DAYS. PLEASE NOTIFY YOUR INSURANCE CARRIER AND REPORT THIS INCIDENT.

ER05-088-LC1-2838

Action Detail

VIN: 1ETZK1ZM3W	Year: 1998	Model: F-SERIES	Case: 783142518
Name: [REDACTED]	Owner Status: Original	WSD: 1998-08-27	
Symptom Desc: FIRE/SMOKE VISIBLE FLAME UNDERHOOD		Primary Phone: [REDACTED]	
Reason Desc: LEGAL - ACCIDENT / FIRE		Secondary Phone: [REDACTED]	
Issue Type: 07 LEGAL	Issue Status: CLOSED	Dealer: FORD OF OCALA INC	
Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION		P & A Code: 02865	
Action Desc: SEND ACKNOWLEDGEMENT LETTER TO CUSTOMER			
Odometer: 90000 MI	Comm Type: OTHER		
Action Date: 02/08/2005	Action Time: 18:53:19:820	Action Date: No	
Analyst Name: CASSANDRA JONES	Analyst: CJONES		

COMMENTS: THERE ARE NO OPEN RECALLS RELATED TO CUST CONCERN. LETTER SENT TO CUSTOMER

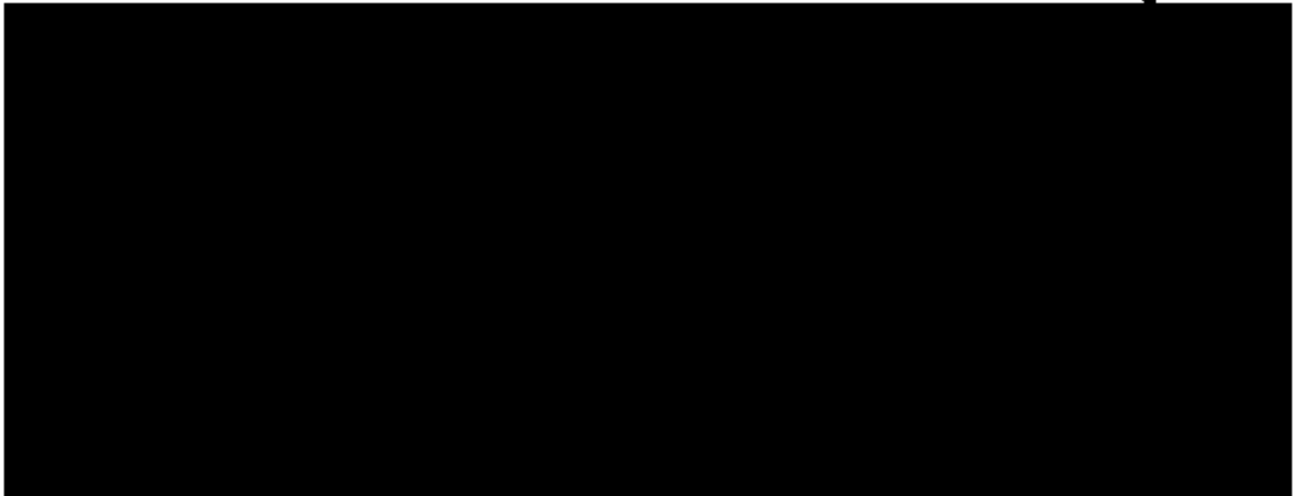
EAHS-005-1C1-2838

Action Detail

VIN: 1FTZX17W3WN [REDACTED]	Year: 1998	Model: F-SERIES	Case: 763142518
Name: [REDACTED]	Owner Status: Original	WSD: 1998-08-27	
Symptom Desc: FIRE/SMOKE VISIBLE FLAME UNDERHOOD		Primary Phone: [REDACTED]	
Reason Desc: LEGAL - ACCIDENT / FIRE		Secondary Phone: [REDACTED]	
Issue Type: 07 LEGAL	Issue Status: CLOSED	Dealer: FORD OF OCALA INC	
Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION		P & A Code: 02805	
Action Desc: CLOSING COMMENTS - DENIAL - BASED ON LITIGATION PREVENTION REVIEW			
Odometer: 90000 MI	Comm Type: OTHER		
Action Date: 02/08/2005	Action Time: 16:53:43:183	Action Date: No	
Analyst Name: CASSANDRA JONES	Analyst: CJONES		

COMMENTS: LETTER SENT TO CUSTOMER

EPH-005-1-C1-2049





- 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

4281 Spring Valley Road, Dallas TX 75244-3694

CUSTOMER
RELATIONSHIP
CENTER

2005 FEB 22 1A 11:04

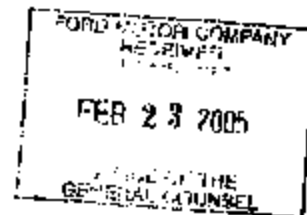
February 14, 2005

RECEIVED

FEB 22 2005

Ford Motor Credit
Consumer Affairs Department
A@MD - 3NE-B
P.O. Box 8248
Dearborn, MI 48126

Our Claim Number: [REDACTED]
Our Insured: [REDACTED]
Date of Loss: 10/29/2004
VIN: 1FMEU1L9 [REDACTED]
Year/Make/Model: 1997 Ford Expedition
Damage: Fire - Total Loss



GEICO Amount	\$8,876.71
Less Salvage Recovery	Pending
Rental	None
Insured Deductible	500.00
Total Subrogation Amount	\$9,176.71

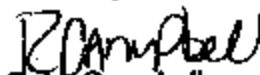
To Whom It May Concern:

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


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





Liberty Insurance Corporation

5050 W Tilghman St Suite 200
Allentown PA 18104
Tel: (610) 398-9800 / (800) 521-0986

February 04, 2005

RECEIVED
FEB 15 2005

FORD MOTOR CORP - CONSUMER AFFAIRS
P O BOX 6248 - MD 3NEB
DEARBORN MI 48126

OUR INSURED: [REDACTED]
OUR CLAIM NUMBER: [REDACTED]
YOUR INSURED:
YOUR CLAIM NUMBER:
DATE OF LOSS: 11/30/2004
PLACE OF LOSS: [REDACTED]
LOSS: MOUNT HOLLY SPRINGS, PA

FORD MOTOR COMPANY
CLAIMS
FEB 15 2005
OFFICE OF THE
GENERAL COUNSEL

Dear Claims Department:

Based on our investigation of this accident, we believe your Insured to be responsible for the damage to our Insured's vehicle. I have enclosed documentation to support the following subrogation claim:

Amount we have paid	\$	19637.20
Salvage (if applicable)	\$	0.00
Our Insured's deductible	\$	100.00
Total amount of damages	\$	19737.20

Please include our claim number on your check for the total amount of damages shown above and send your payment to my attention. If you have any questions, please contact me at the number listed above, extension 689.

Sincerely,

LINDA OWENS/BBB
Subrogation Department

Enclosure

- 11/30/04
- Mount Holly Springs, PA
- \$ 19,737. -
- '01 F-150
- VIN
~ 89,000 (M)
- WSO 10/12/00
- ESP 60/80,711 (M)



ER08-001-LC1-2843



[Handwritten scribble]

La Homa Doors

RECEIVED MAR 14 2005

March 10, 2005

Re: DOL: January 30,2005
Vehicle: 1997 F-150
VIN# 1FTDF17W3VL [REDACTED]

To Whom It May Concern:

On January 30,2005 my vehicle started on fire inside my business fire dept. found no signs of it being arson. Yes I would like to make a claim with Ford Motor Company the truck was parked all weekend in warehouse before it started on fire by itself we, only use truck for door installations

And it also, made some damage to warehouse and some doors the vehicle has not been moved or touch by anyone. Please notify me when will some one from your office will be coming in to take a look at vehicle.

Thank you,

Javier Ramirez
Owner

1/8 MILE W. OF BENTSEN PALM DR. ON 3 MILE LINE
P.O. BOX 1032
MISSION, TEXAS 78572
(956)585-1123 (Voice)
(956)585-2733 (Fax)

All Action Details for Issue

Print

VIN: 1FTDE1ZK3V [REDACTED] Year: 1997 Model: F-SERIES Case: 1547990315
 Name: [REDACTED] Owner Status: Subsequent WSD: 1996-10-18
 Symptom Desc: FIRE/SMOKE SCORCHED/BURNT Primary Phone: [REDACTED]
 Reason Desc: LEGAL - CUSTOMER WAITING FOR OGC LETTER Secondary Phone:
 Issue Type: 02 INFORMATION Issue Status: CLOSED

Action: CB-IT TAKES ABOUT 5 BUSINESS DAYS TO RECEIVE THE LETTER
 Dealer: 04513 SPIKES MOTOR COMPANY, INC. Origin Desc: US CONCERN CASE BASE
 Odometer: 1 MI Contact Type: PHONE
 Analyst Name: Analyst: WCRU/Z5
 Action Date: 02/08/2005 Action Time: 16:37:40.273 Action Data: No

Caller Information if Different From Vehicle Owner:

First Name	Middle Initial	Last Name	Day Phone	Relationship
DALIA		OLIVAREZ	9565853634	OTHER

Comments: CUSTOMER SAID: THE CUST HASNT RECEIVED A PHONE CALL FROM CONSUMER AFFAIRS THE INSURANCE COMPANY IS GOING TO INSPECT THE VEH THE VEH IS CURRENTLY IN THE WAREHOUSE WERE THE FIRE STARTED FIRE REPORT NUMBER 05-03148THE FIRE WAS JANUARY 30TH THE VEH IS COMPELTELTY BURNT THE CRC SERVICE REP STATED NOT TO MOVE THE VEH THE CUST DOESN'T HAVE THE INSURANCE COMPANY CLAIM REPORTDEALER SAID: SPIKES MOTOR CO, 805 E. EXPRESSWAY 83MISSION, TX 78672DISTANCE: 1.15 MILES TEL: (866) 685-1601CRC ADVISED: THANK YOU FOR CONTACTING FORD MOTOR COMPANY IN RELATION TO THIS ISSUE. IT TAKES APPROXIMATELY 10 BUSINESS DAYS TO RECEIVE THE LETTER TO TAKE IN ACCOUNT FOR ANY POSTAL OFFICE DELAYS. IF YOU DO NOT RECEIVE YOUR LETTER IN 10 DAYS, PLEASE CALL US BACK AND WE WILL REQUEST FOR A SECOND LETTER TO BE MAILED ADVISED 10 BUSINESS DAYS

ENC01-805-101-2645

AE Action Details for Issue

Print

VIN: 1ETDE1ZWSM [REDACTED] Year: 1997 Model: F-SERIES Case: 1547990315
 Name: [REDACTED] Owner Status: Subsequent WSD: 1996-10-18
 Symptom Desc: FIRE/SMOKE SCORCHED/BURNT Primary Phone: [REDACTED]
 Reason Desc: CAC RELATED - FM CSR FOLLOWING CONTACT Secondary Phone:
 Issue Type: 02 INFORMATION Issue Status: CLOSED

Actions: CALLBACK ADD ADDITIONAL COMMENTS
 Dealer: 04513 SPIKES MOTOR COMPANY, INC. Origin Desc: US CONCERN CASE BASE
 Odometer: 158006 MI Comm Type: PHONE
 Analyst Name: PHENGPHET DARAPHONE Analyst: DPHENGPH
 Action Date: 02/02/2005 Action Time: 16:20:46.118 Action Data: No

Caller Information if Different From Vehicle Owner:

First Name	Middle Initial	Last Name	Day Phone	Relationship
DALLA		OLIVAREZ		OTHER

Comments CUSTOMER SAID: JAN.30TH VEH CAUGHT ON FIRE AND IS COMPLETELY BURNT. CALLING ON SAME ISSUE. VEH IS PARKED IN OUR WAREHOUSE WHERE THE FIRE WAS. NO INJURIES.WANT TO KNOW WHAT IS GOING ON WITH MY CLAIM. NEED TO MOVE THE VEH BECAUSE IT'S IN THE WAY - WANT TO START CLEANING THINGS UP. WHEN WILL LEGAL START COMING IN TO CHECK THIS VEH?DEALER SAID: SPIKES MOTOR CO.805 E. EXPRESSWAY 83MISSION, TX 78572TEL: (956) 585-1601CRC ADVISED: PLEASE ALLOW THE REQUESTED TIME FOR THE FOLLOW UP TO OCCUR SO THAT YOUR ISSUE MAY BE PROPERLY ADDRESSED.

EP02-003-101-2846

All Action Details for Issue

Print

VIN: 1EDF1Z3V [REDACTED] Year: 1997 Model: F-SERIES Case: 1547990315
 Name: [REDACTED] Owner Status: Subsequent WBD: 1998-10-18
 Symptom Desc: FIRE/SMOKE SCORCHED/BURNT Primary Phone: [REDACTED]
 Reason Desc: RECALL/ONP - VEHICLE INVOLVEMENT Secondary Phone:
 Issue Type: 02 INFORMATION Issue Status: CLOSED

Action: ADVISE CUST NO FSA'S AT THIS TIME
 Dealer: 04513 SPIKES MOTOR COMPANY, INC. Origin Desc: US INQUIRY CASE BASE
 Odometer: 158006 MI Comm Type: PHONE
 Analyst Name: PEREZ DANIELA Analyst: DPerez27
 Action Date: 01/31/2005 Action Time: 15:18:38.473 Action Data: No

Caller Information if Different From Vehicle Owner:

First Name	Middle Initial	Last Name	Day Phone	Relationship
DALIA		OLIVAREZ	8565851123	OTHER

Comments: CUSTOMER SAID: -CUST ALSO WANTED TO KNOW IF THE VEH WAS INVOLVED IN RECALL 05S28 AS SHE HEARD THAT SOME VEH MAY CATCH FIRE. DEALER SAID: -NONE. SPIKES MOTOR CO. 806 E. EXPRESSWAY 834MISSION, TX 78572 TEL: (856) 685-1801 FAX: (856) 619-8718. CRC ADVISED: VEHICLE IS NOT INVOLVED IN ANY RECALL. CSP AT THIS TIME. ADVISED CUST THAT VEH IS NOT INVOLVED IN RECALL 05S28. ADVISED AS TO WHICH VEH ARE INVOLVED AND WHAT THE CONCERN WAS. SPEED CONTROL.

EM05-085-LC1-2847

All Action Details for Issues

Print

VIN: 1FTDE17W3M [REDACTED] Year: 1997 Model: F-SERIES Case#: 1547990315
 Name: [REDACTED] Owner Status: Subsequent WSD: 1998-10-18
 Symptom Desc: FIRE/SMOKE SCORCHED/BURNT Primary Phone: [REDACTED]
 Reason Desc: LEGAL - ACCIDENT / FIRE Secondary Phone:
 Issue Type: 10 OGC Issue Status: CLOSED

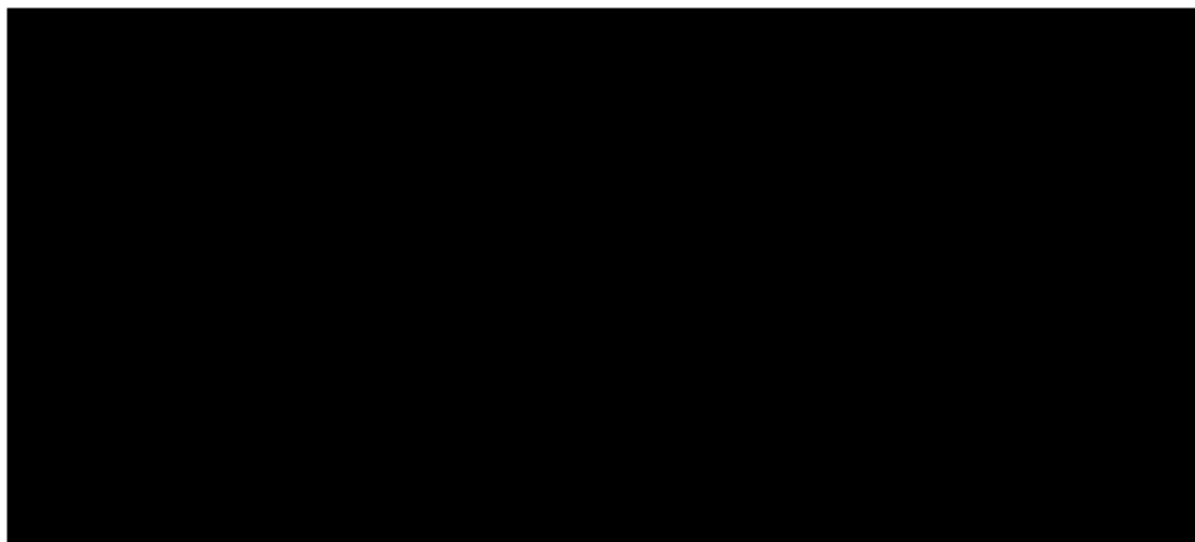
Action: CONTACT ADVANCED TO OGC
 Dealer: 04513 SPKES MOTOR COMPANY, INC. Origin Desc: US CONCERN CASE BASE
 Odometer: 158006 MI Coman Type: PHONE
 Analyst Name: PEREZ DANIELA Analyst: DPEREZ27
 Action Date: 01/31/2005 Action Time: 15.13.18.124 Action Date: No

Caller Information if Different From Vehicle Owner:

First Name	Middle Initial	Last Name	Day Phone	Relationship
DALIA		OLIVAREZ	8585851123	OTHER

Comments: CUSTOMER SAID: -REASON CALLING YESTERDAY THE TRUCK IT CAUGHT ON FIRE-JAN 30TH VEH CAUGHT ON FIRE-DONT KNOW WHERE THE FIRE STARTED AS THE VEH IS COMPLETELY BURNT-STILL AT THEIR PREMISES- WAREHOUSE-YES FIRE REPORT DONE WITH FIRE DEPT, DONT KNOW AS THEY WILL SEND IT IN TO THEM ON TUESDAY- DOES NOT HAVE THE REPORT NUMBER-DID FILE A CLAIM WITH INSURANCE COMPANY THIS MORNING JAN 31-VEH IS NOT REPARABLE, TOTALLY BURNED-WAS NOT RUNNING-VEH WAS PARKED-BURNED ALL THE TOOLS IN THE TRUCK AND SOME OF THE MACHINES AROUND THE VEH IN THEIR BUILDING-MELTED THE LIGHT BULBS AND AND SWITCHES FOR THE MACHINES-DEALER SAID: -NONECRC ADVISED: I WILL FORWARD THIS INFORMATION TO THE FORD OGC DEPARTMENT. YOU WILL BE CONTACTED WITHIN 3-5 BUSINESS DAYS.-SPOKE TO DALIA OLIVAREZ-CUST SECRETARY- BEST NUMBER TO CALL WOULD BE (858) 585-1123

ERP5-005-101-2049



HANNAH, COLVIN & PIPES, L.L.P.

ATTORNEYS AT LAW
2051 SILVERSIDE DRIVE, SUITE 200
BATON ROUGE, LOUISIANA 70808
TELEPHONE: (225) 766-8240
FACSIMILE: (225) 766-5546

MICHAEL F. COLVIN
W. RANSOM PIPES
JANICE M. REEVES
JUDSON C. BANKS
DORIE M. ABADIE

*Also admitted in TX

HANK S. HANNAH
(1951 - 1993)

October 18, 2004

Via Fax: (313) 845-4089 and
Certified Mail, Return-Receipt Requested

Ms. Shawn L. Norton
Ford Motor Company
Parklane Tower West, Suite 300
Three Parklane Boulevard
Dearborne, Michigan 48126-2568

RECEIVED OCT 22

Re: State Farm Claim #: [REDACTED]
Insureds: [REDACTED]
Location: [REDACTED]
Port Barre, LA [REDACTED]
Date of Loss: October 12, 2004
Our File No.: 821-2154

- 10/12/04
- Port Barre, LA
- '95-F150

Dear Ms. Norton:

Please be advised that I have been retained by State Farm Fire & Casualty Company in connection with damages sustained as a result of a fire which occurred on October 12, 2004, at the residence of its insured [REDACTED] in Port Barre, Louisiana. According to State Farm's investigation, the fire originated in a 1995 Ford F150, that was parked under the carport of the above mentioned residential dwelling. As a result of the fire, the residential dwelling and the vehicle sustained substantial property damage.

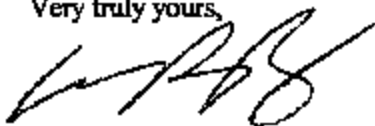
The remains of the vehicle have not yet been removed from the fire scene, which is located at the above-referenced address. However, I do expect that the vehicle will be removed from the fire scene by the early part of next week, and safe-guarded at a storage facility. If you wish to schedule an inspection of either the fire scene or the vehicle, please call me upon your immediate receipt of this correspondence, so that we may make the necessary arrangements.

By way of this correspondence, State Farm Fire & Casualty Company is placing Ford Motor Company on immediate notice of this claim as they are seeking full reimbursement of payments made or to be made to or on behalf of its insured, Lenus and Carol Duplechain.

Ms. Shawn L. Norton
October 18, 2004
Page 2

If you have any questions or wish to discuss this matter further, please call.

Very truly yours,

A handwritten signature in black ink, appearing to read 'W. Ransom Pipes', written in a cursive style.

W. Ransom Pipes

WRP/th



Mr. Norton,

February 10, 2005

My name is [REDACTED] This letter is concerning a 1996 Ford F150 4x4 pick-up truck. On Friday the 4th day of February 2005 my truck caught fire while sitting halfway under the carport of a house I'm renting. The fire started under the hood and caught the siding to the house. Thankfully one of our neighbors pulled the truck from the house with his tractor before the house burned down. Although the house was saved and my wife and 2 of our boys were waken up with no harm done, we do not know what caused the fire to start.

I have been a faithful Ford owner, owning a 79 Ford pick-up, 82 Thunderbird, 93 Mercury Villager Minivan and a 96 Ford F150. In 1995 December 2, the 79 Ford Pick-up exploded the transmission which caused me 2nd and 3rd degree burns on my face and hands, and neck, and leg, and arms, leaving my body full of scars, not to mention having to amputate my right leg below the knee. After the 29 day stay in the burn unit of St. Johns hospital which brought me back to life 2^{ce}, I still bought the 96 Ford truck and now have nothing to show for it, but my fake leg.

I don't have a lot of money to pay for a lawyer, so I thought I would write this letter and just see what kind of a company Ford Motor is.

Enclosed are 3 pictures of my truck. After you've had a chance to see them, please send them back.

RECEIVED FEB - 7 2005

New

BEGINNING OF CONTACT
02/05/2005

VOICE OF THE CUSTOMER TRACKING SYSTEM

08.60.07

REGION: 63 KANSAS CITY	OGC ISSUE	CASE NBR: 1439890355
VIN: 1FTEF14Y3T	ZONE: C2	OPENED: 02/04/2005
	ENGINE: Y	VEH TYPE: T
		CLOSED: 02/04/2005

LAST NAME:		FIRST NAME:		STATUS:	CLOSED
TITLE:				MI:	
ADDRESS:		STATE:	MO	ZIP:	
CITY:		MODEL:	F160 4X4 STYLESIDE PICKUP		
HOME PHONE:		SALES CODE:	F53490	P & A:	05099
MODEL YEAR:	1996				
MILEAGE:	140000				
DEALER NAME:	DON VANCE FORD, INC				
REASON CODE:	0782 LEGAL - ACCIDENT / FIRE				
SYMPTOMS:	704145 FIRE/SMOKE VISIBLE FLAME UNDERHOOD				

ORIGIN: CAC138 - US CONCERN CASE BASE COMMUNICATION: PHONE
 ACTION: 705 - CONTACT ADVANCED TO OGC
 DOCUMENT: ANALYST: RBENIMAD RAJESHWAREE BENIMADHU

DATE: 02/04/2005 TIME: 12.13.13:
 ACTION DATA/COMMENTS:

CUSTOMER SAID: -VEH WAS SITTING AT HOME UNDER THE CAR PORT W
 HEN IT CAUGHT ON FIRE -THE SIDES OF CUST HOME CAUGHT ON FIRE
 ASWELL -WAS TOLD TO CALL THE BBB AND FORD -FIRE DEPT. CAME
 OUT ALSO THE POLICE CAME BUT DID NOT DO A REPORT DEALER SAID:
 -NONE CRC ADVISED: I WILL FORWARD THIS INFORMATION TO THE FO
 RD OGC DEPARTMENT. YOU WILL BE CONTACTED WITHIN 3-5 BUSINESS
 DAYS.

FORD MOTOR COMPANY
 RECEIVED
 CLAIMS UNIT
 FEB 7 2005
 OFFICE OF THE
 GENERAL COUNSEL

CONSUMER AFFAIRS

02/05/2005 FAXOGIN

ERR5-005-LC1-2853





State Farm Insurance Companies®



RECEIVED
FEB 15 2005

February 8, 2005

State Farm Insurance Company
P O Box 100060
Duluth, GA 30096

Ford Motor Company
Attention: Consumer Affairs
P. O. Box 6248
MD-3NE-B
Dearborn, MI 48128-2568

FORD MOTOR COMPANY
RECEIVED
FEB 15 2005
OFFICE OF THE
GENERAL COUNSEL

RE
FEB 14 12:30

CONSUMER AFFAIRS
SECTION

RE: Our Claim Number: [REDACTED]
Our Insured: [REDACTED]
Date of Loss: January 22, 2005
Make/Model: 1995 Ford F150
Vehicle Identification Number: 1FTEX15H1S [REDACTED]

Dear Sir/Madam:

The identified 1995 Ford F150 is insured by State Farm Mutual Automobile Insurance Company. This vehicle experienced a fire loss on January 22, 2005.

State farm would like to give you an opportunity to inspect the 1995 Ford F150 and give you advance notice of our potential subrogation claim.

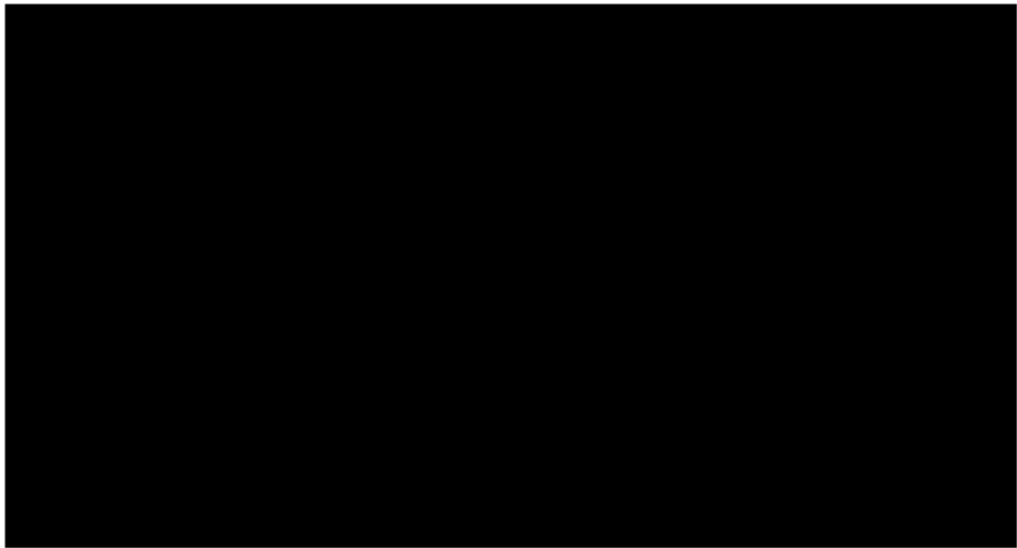
Please contact me at 770-418-3154 to set up a time for your inspection.

Sincerely,

Sheldon Allen
Claim Representative
State Farm Mutual Automobile Insurance Company
(770) 418-3154

- 1/22/05
- 195 F-150
- VIN
- WSO 2/11/05
- ESP 32/63,166

cc: State Farm Fire & Casualty
Attention: Stan Rawl
P O Box 100060
Duluth, GA 30096



Esurance
A member of the Allstate Insurance Group

APR 11 2005

April 01, 2005

-no
enclosures

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

(PS)

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

Insured : [REDACTED]
Date of Loss : 3/25/2005 1:45:00 PM
Claim Number : [REDACTED]

To Whom It May Concern:

Please be advise our insured has had a loss to his 1997 Ford Expedition due to a part failure. It is the same part failure that the 2001-2002 year models have. Enclosed you will find the public notice made the law firm - Loeff Cabraver, Heisann & Bernstein, LLP.

Our insured is not be represented by this law firm but the article states this vehicle was noted by the National Highway Traffic Safety Administration.

We are placing you on notice at this time. Per the findings of both the shop representative for Halfan Ford and per our own appraiser this fire was a result of the same failed part as the 2001-2002 vehicles of the same type.

The estimates, photographs, supplements and this article are included for your review. Our subrogation department will be in touch with you for recovery.

If you have any additional questions, please contact the undersigned by either method noted below.

Thank you in advance for your cooperation in this matter.

Sincerely,

Kimberley Wilson

Kimberley Wilson
Claims Representative
On behalf of: Home State County Mutual Insurance Company
Phone #: (800) 631-0089 5426
E-mail address: kwilson@central.Esurance.com

- 3/25/05
- 197 Exped



Joanne
Sroeton

APR 06 2005



FARMERS

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

03/29/2005

Ford Motor Company
P.O. Box 6248 MD-3NE-B
Dearborn, Michigan 48126

Re: Our Insured: [REDACTED]
Our Claim #: [REDACTED]
Date of Loss: 12/30/2004
Your Insured: Ford Motor Company
Your Claim #: [REDACTED] vehicle owner
Deductible Amount: \$120.00
Loss of Use Amount: \$0
Total Amount Owed: \$13,448.20

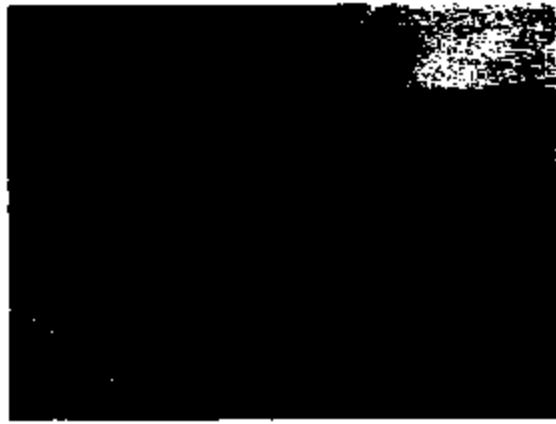
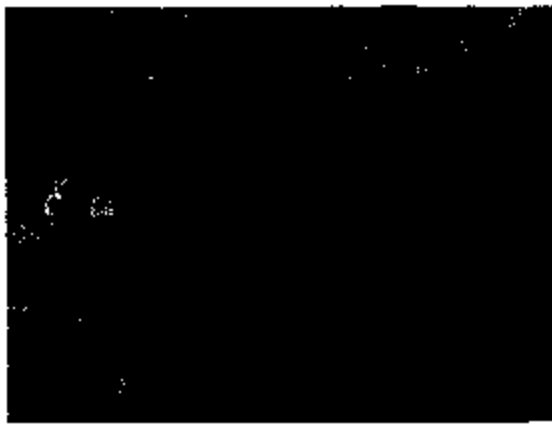
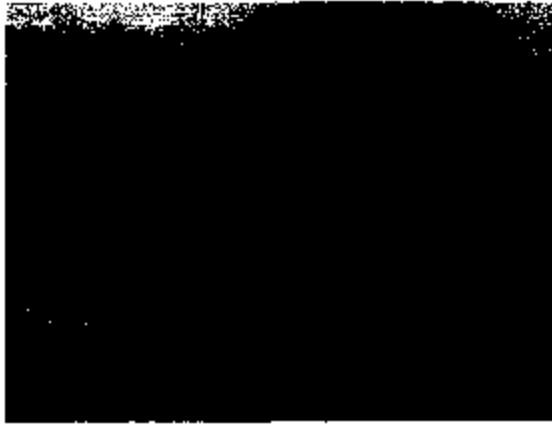
Our insured's vehicle was rendered a total loss and salvage has now sold for \$1,129.00. We have deducted this recovery from the original amount making the amount owed us \$13,448.20.

Sincerely,
Farmers Insurance Exchange

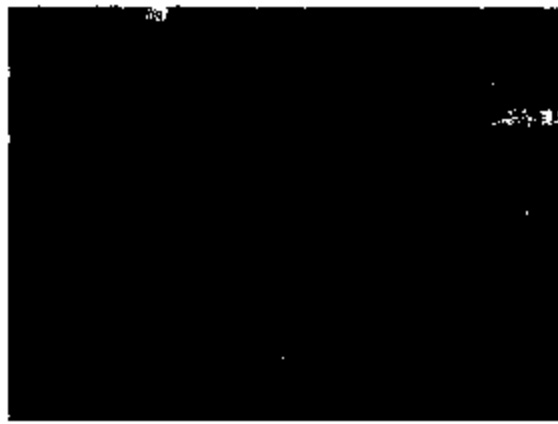
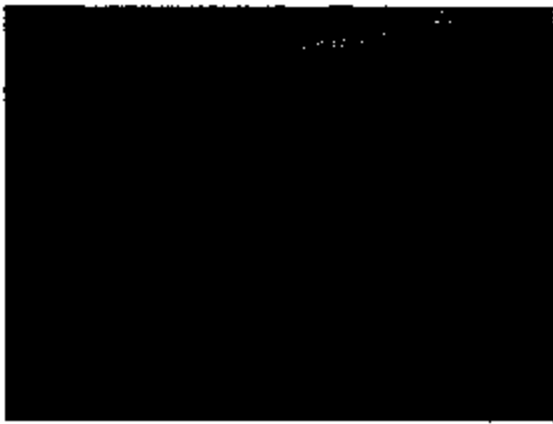
Grace E. Ege-Moody
Grace Ege-Moody
Auto Subrogation Representative
888-991-1179 731
grace.moody@farmersinsurance.com

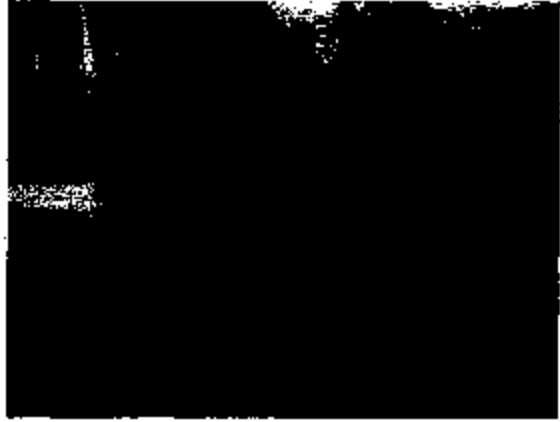
- NO EXP
- NO Photos
- NO VERM
- NO POL/Free Ret.

EN25-005-LC1-2857



E883-883-LC1-2858





EA05-085-LC1-2860



TELEPHONE
(716) 866-1300

TOLL FREE
(888) 200-8877

BARTH, SULLIVAN & BEHR, LLP
ATTORNEYS AND COUNSELORS AT LAW
600 CONVENTION TOWER
43 COURT STREET • SUITE 600
BUFFALO, NEW YORK 14202-3196

FACSIMILE
(716) 866-1494
(FACSIMILE SERVICE NOT ACCEPTED)
WEB SITE
www.bsandblaw.com

February 9, 2005

**Via Certified Mail -
Return Receipt Requested**

Ford Motor Company
Attn: Legal Department
One American Road
Dearborn, MI 48126-2798

Ford Motor Company
Attn: Claims Department
One American Road
Dearborn, MI 48126-2798

OFFICE OF THE GENERAL COUNSEL
RECEIVED
CM
US FEB 11 11:01

FORD MOTOR COMPANY
RECEIVED
CLAIMS UNIT
FEB 14 2005
OFFICE OF THE
GENERAL COUNSEL

Re: [REDACTED], also

v. Ford Motor Company and Coon
Date of Incident : 2/2/05
Our File No. : Unassigned

Dear Sirs/Madams:

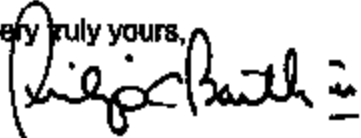
Our office represents Preferred Mutual Insurance Company for the damage to the premises owned [REDACTED] Falls, New York, which occurred on February 2, 2005 at approximately 7:00 a.m. Preliminary investigation indicates that this fire may have been caused by a 1997 Ford F-150 pickup truck that was parked in the garage at the time of the fire. We have secured the pickup truck and the garage area.

We are placing you on notice of a potential claim on behalf of Preferred Mutual Insurance Company as subrogee of [REDACTED] for the damaged caused by the fire. We are offering you the opportunity to participate in the further investigation of this fire, including damage, cause, and origin.

Please contact the undersigned within 7 days from the date of this letter to advise us whether you would like to participate. If we do not hear from you within that time, we will continue with our investigation.

Thank you very much.

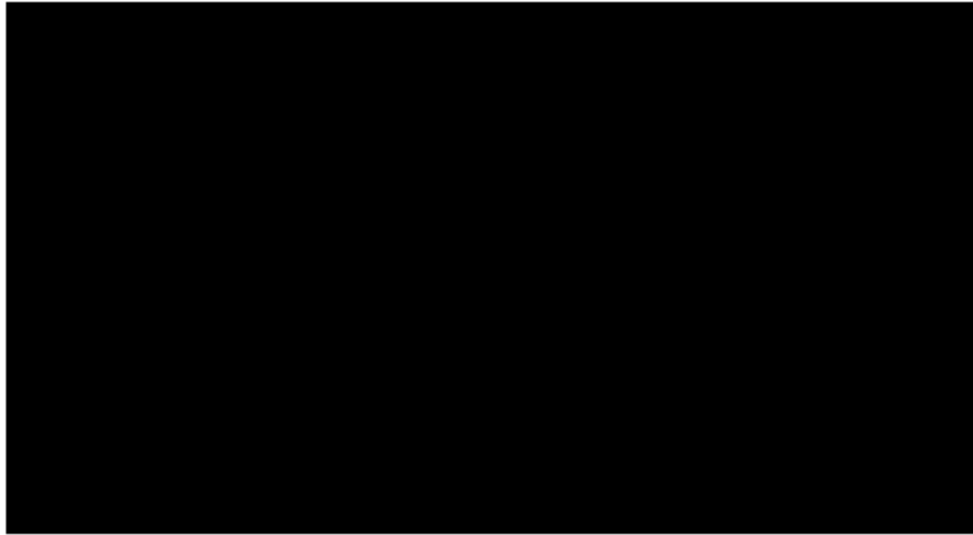
Very truly yours,


Philip C. Barth III

PCBIII/dd

Preferred Mutual; and Coon v. Ford/Coon/Ford Motor Co. 02.09.05

EQ85-025-LC1-2861



All Action Details for Issue

Print

VIN: 1EMP118102 [REDACTED] Year: 1999 Model: EXPEDITION Case: 466720522
 Name: [REDACTED] Owner Status: Original WSD: 1999-08-22
 Symptom Desc: GENERAL INQUIRIES REQUEST/NON-VEHICLE RELATED Primary Phone: [REDACTED]
 Reason Desc: LEGAL - CUSTOMER WAITING FOR OGC LETTER Secondary Phone: [REDACTED]
 Issue Type: 02 INFORMATION Issue Status: CLOSED

Action: CB-IT TAKES ABOUT 5 BUSINESS DAYS TO RECEIVE THE LETTER
 Dealer: 01928 BERT WOLFORD INC Origin Desc: US CONCERN CASE BASE
 Odometer: 100000 MI Conn Type: PHONE
 Analyst Name: STEPHEN YOUNG Analyst: SYOUNG80
 Action Date: 02/25/2005 Action Time: 13.08.46.206 Action Date: No

Caller Information if Different From Vehicle Owner:

First Name	Middle Initial	Last Name	Day Phone	Relationship
NORMA		BROGAN		SPOUSE

Comments CUSTOMER SAID: - THE CUST IS CALLING BACK RE A RESPONSE FROM OGC- SHE CALLED YESTERDAY AND WAS ADVISED THAT THAT WAS THE 5 TH DAY AND TO WAIT TO HEAR FROM THEM- SHE IS CALLING BACK BECAUSE SHE HAS NOT HEARD FROM THEM- SHE IS IN A HURRY TO GET THE THIS ISSUE RESOLVED BECAUSE SHE NEEDS A NEW VEHICLE DEALER SAID: - NONE CRC ADVISED: THANK YOU FOR CONTACTING FORD MOTOR COMPANY IN RELATION TO THIS ISSUE. IT TAKES APPROXIMATELY 10 BUSINESS DAYS TO RECEIVE THE LETTER TO TAKE IN ACCOUNT FOR ANY POSTAL OFFICE DELAYS. IF YOU DO NOT RECEIVE YOUR LETTER IN 10 DAYS, PLEASE CALL US BACK AND WE WILL REQUEST FOR A SECOND LETTER TO BE MAILED. SUP CALL LIVE TL LYNN ADVISED FOLLOW UP TIME HAS NOT PASSED 10 DAYS WHICH WOULD BE MARCH 306.

[REDACTED] ?Action=ActionList... 2/28/2005

All Action Details for Issue

Print

VIN: 1FMPU16L0X1 [REDACTED] Year: 1999 Model: EXPEDITION Case: 488720522
 Name: [REDACTED] Owner Status: Original WSD: 1999-06-22
 Symptoms Desc: FIRE/SMOKE SCORCHED/BURNT UNDERHOOD Primary Phone: [REDACTED]
 Reason Desc: CAC RELATED - FM CSR FOLLOWING CONTACT Secondary Phone: [REDACTED]
 Issue Type: 02 INFORMATION Issue Status: CLOSED

Action: CALLBACK ADD ADDITIONAL COMMENTS
 Dealer: 01828 BERT WOLFORD INC Origin Desc: US CONCERN CASE BASE
 Odometer: 100000 MI Comm Type: PHONE
 Analyst Name: MCKENZIE NORMA Analyst: NMCKENZ4
 Action Date: 02/24/2005 Action Time: 12.53.13.774 Action Data: No

Caller Information If Different From Vehicle Owner:

First Name	Middle Initial	Last Name	Day Phone	Relationship
NORMA		BROGAN		SPOUSE

Comments: CUSTOMER SAID: TODAY IS 5 DAYS SINCE SHE WAS TOLD THE LEGAL DEPT WIL BE CONTACTING HER. SHE NEED TO HERE FROM FORD BECAUSE SHE NEED TO PURCHASE A VEH SHE HAS OTHER THINGS THAT NEED TO BE DONE SHE STILL HASNT HEARD FROM ANY ONE DEALER SAID: NONE CRC ADVISED: PLEASE ALLOW THE REQUESTED TIME FOR THE FOLLOW UP TO OCCUR SO THAT YOUR ISSUE MAY BE PROPERLY ADDRESSED. ADVISE CSUT THAT TODAY IS THE 5 DAYS PLEASE ALLOW THE LEGAL DEPT TO REVIEW THE ISSUE THEY WILL CALL HER.

All Action Details for Issue

Print

VIN: 1FMPU18L02 [REDACTED] Year: 1999 Model: EXPEDITION Case: 408720522
 Name: [REDACTED] Owner Status: Original WSD: 1999-06-22
 Symptom Desc: FIRE/SMOKE VISIBLE FLAME UNDERHOOD Primary Phone: [REDACTED]
 Reason Desc: CAC RELATED - FM CSR FOLLOWING CONTACT Secondary Phone: [REDACTED]
 Issue Type: 02 INFORMATION Issue Status: CLOSED

Action: CALLBACK ADD ADDITIONAL COMMENTS
 Dealer: 01928 BERT WOLFEFORD INC Origin Desc: US CONCERN CASE BASE
 Odometer: 100000 MI Comm Type: PHONE
 Analyst Name: PEPPI DIMITROPOULOS Analyst: PDIMITRO
 Action Date: 02/21/2005 Action Time: 13:57:33.290 Action Date: No

Caller Information if Different From Vehicle Owner:

First Name	Middle Initial	Last Name	Day Phone	Relationship
NORMA	J	BROGAN	3043519720	SPOUSE

Comments CUSTOMER SAID: =VEH CAUGHT ON FIRE IN HER DRIVEWAY A WEEK AGO =CUST CALLED AND SPOKE TO KRISTINA AND WOULD LIKE TO KNOW IF SHE CAN SPEAK TO HER AGAIN =CUST WOULD LIKE TO KNOW WHEN SOMEONE WILL COME OUT AND INSPECT HER VEHICLE=CUST HAS NOT BEEN CONTACTED BY CONSUMERS AFFAIRS AS OF YET =CUST THOUGHT SOMEONE IS COMING OUT TO INSPECT HER VEHICLE DEALER SAID: BERT WOLFE FORD INC 1900 PATRICK STREET PLAZA CHARLESTON, WV 25312 TEL: (304) 344-1601 CRC ADVISED: PLEASE ALLOW THE REQUESTED TIME FOR THE FOLLOW UP TO OCCUR SO THAT YOUR ISSUE MAY BE PROPERLY ADDRESSED.=NO RECALLS OR FSA ON THE VEH

All Action Details for Issue

Print

VIN: 1FMPU18L0X [REDACTED] Year: 1999 Model: EXPEDITION Case: 466720522
 Name: [REDACTED] Owner Status: Original WSD: 1999-08-22
 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: 01828 BERT WOLFORD INC Origin Desc: US CONCERN CASE BASE
 Odometer: 100000 MI Comm Type: PHONE
 Analyst Name: FERRARO KRISTINA Analyst: KFERRARO
 Action Date: 02/17/2005 Action Time: 11.06.43.442 Action Date: No

Caller Information If Different From Vehicle Owner:

First Name	Middle Initial	Last Name	Day Phone	Relationship
NCFMA		BROGAN		SPOUSE

Comments CUSTOMER SAID: =DATE: 2/15/2005 BETWEEN 8-8:15 PM=VEH CAUGHT FIRE IN THE DRIVEWAY=CUST GOT HOME ABOUT 10 MINUTES BEFORE VEH CAUGHT FIRE. SHE COULD SMELL SOMETHING BURNING WHEN SHE GOT OUT BUT DIDNT THINK ANYTHING OF IT.=A NEIGHBOR NOTIFIED CUST THAT HER VEH WAS ON FIRE AND CALLED FIRE DEPT. FOR CUST=ALUN CREEK AND JEFFERSON VOLUNTEER FIRE DEPTS. CAME TO PUT OUT FIRE =FIRE REPORT FILED BUT CUST DOESNT HAVE A COPY=CUST HAS NOTIFIED INSURANCE COMPANY: STATE FARM - CLAIM [REDACTED] (X2)=THE FIRE DAMAGED THEIR 1995 F-150 AND DAUGHTER'S 1996 CHRYSLER 300M=THERE IS ALSO SOME DAMAGE TO HER GARAGE=CUST ISNT SURE IF THE VEH IS INVOLVED IN THE SPEED CONTROL RECALL BECAUSE IT DOESNT MENTION 1999 =CUST WOULD LIKE TO KNOW WHAT HER NEXT STEPS SHOULD BE=-----BEST # TO REACH CUST: 304-340-2525 (PAGER) OR 304-351-8720 (WORK)DEALER SAID: BERT WOLFE FORD INC 1800 PATRICK STREET PLAZACHARLESTON, WV 26312CFC ADVISED: I WILL FORWARD THIS INFORMATION TO THE FORD OGC DEPARTMENT. YOU WILL BE CONTACTED WITHIN 3-5 BUSINESS DAYS.

All Action Details for Issue

Print

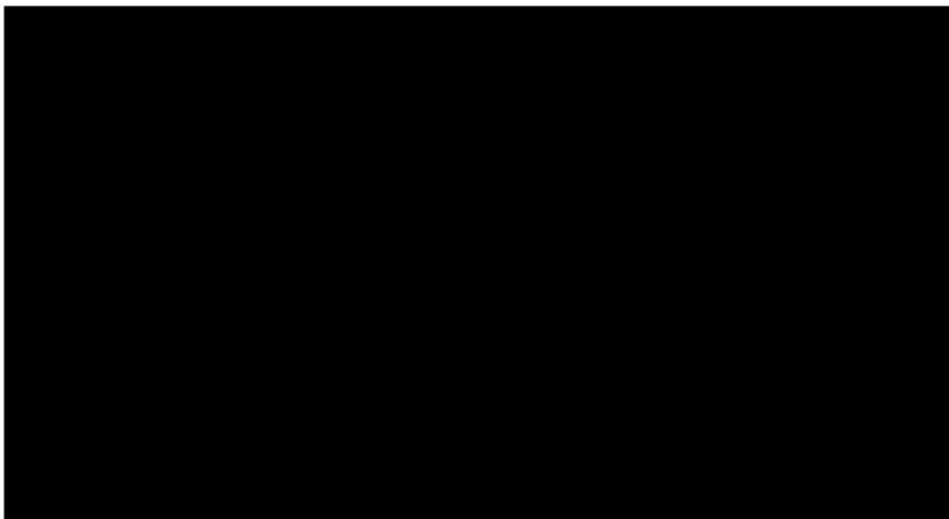
VIN: 1FMPU18L0	Year: 1998	Model: EXPEDITION	Case: 466720622
Name: [REDACTED]	Owner Status: Original	WSD: 1998-06-22	
Symptom Desc: NOISE ACCESSORY DRIVE		Primary Phone: [REDACTED]	
Reason Desc: PROD/COMP DUR/PERF - VEHICLE CHARACTERISTIC		Secondary Phone: [REDACTED]	
Issue Type: 02 INFORMATION	Issue Status: CLOSED		

Action: ADVISE CUST CRC WILL FOLLOW UP		
Dealer: 01828 BERT WOLFORD INC		Origin Desc: US CONCERN CASE BASE
Odometer: 42000 MI	Comm Type: EMAIL	
Analyst Name: PATRICK PINNOCK	Analyst: PPINNOCK	
Action Date: 02/21/2002	Action Time: 12:57:03.602	Action Data: No

Comments CUSTOMER SAYS: I OWN A 98 FORD EXPEDITION AND HAVE HAD NUMEROUS PROBLEMS. I NOTICED A LOUD ROARING/GROWLING NOISE. WE HAVE HAD THE TRANSFER CASE, THE DRIVE SHAFTS AND THE SENSORS REPLACED WITH NO RESULTS. THE NOISE IS STILL THERE. WE HAVE SINCE HAD THE VEHICLE BACK TO THE DEALERSHIP APPROXIMATELY FOUR OR FIVE TIMES. EVERYONE FROM THE DEALERSHIP HAS HEARD THE NOISE WHILE ON A TEST DRIVE. THE NOISE IS NOT THERE WHEN THE WIRING FROM THE TRANSFER CASE IS DISCONNECTED. YOUR ENGINEER IS TELLING US THAT IT IS NORMAL. HE CAME TO BERT WOLF FORD TODAY AND ADVISED THE MECHANIC AND GENERAL MANAGER OF THE SERVICE DEPARTMENT THAT THE NOISE IS SUPPOSED TO BE THERE. I HAVE A DIFFICULT TIME UNDERSTANDING THIS STATEMENT BECAUSE THE NOISE WAS NOT IN THE CAR WHEN WE BOUGHT IT. IF THE NOISE IS SUPPOSED TO BE NORMAL, WHY WOULD ANYTHING NEED TO BE REPLACED IN THE BEGINNING. I PAID OVER 40,000 FOR THIS VEHICLE AND FEEL THAT I HAVE BEEN GIVEN THE RUNAROUND. BERT WOLF FORD WAS TRYING TO HELP US FIND THE PROBLEM, BUT AFTER YOUR ENGINEER CLAIMS THAT THE NOISE IS "NORMAL" WE WERE TOLD NOTHING ELSE CAN BE DONE. I FEEL THAT THIS IS NOT FAIR DUE TO THE FACT THAT I HAVE PAID OVER \$40,000. THE MECHANIC AT BERT WOLF DOES NOT HAVE ANOTHER VEHICLE TO COMPARE OURS TO SINCE THIS TYPE OF TRANSMISSION IS NO LONGER USED. PLEASE ADVISE ME ON WHAT I CAN DO TO CORRECT MY PROBLEM. I HAVE BEEN A FAITHFUL FORD CUSTOMER FOR AS LONG AS I HAVE HAD MY LICENSE. PER CUSTOMER, DEALER SAYS: NONE CAC ADVISED: - CRC UNABLE TO REACH DEALER - CRC WILL RE-CONTACT DEALER NEXT BUSINESS DAY TO DISCUSS YOUR SITUATION - FOLLOW UP WITH CUSTOMER INFERENCE CASE ID: 5400

Action: FORD COVERED REPAIR MADE - WARRANTY		
Dealer: 01828 BERT WOLFORD INC		Origin Desc: DEALER
Odometer: 42000 MI	Comm Type: VISIT	
Analyst Name: KRIS SKEENS	Analyst: K-SKEENS	
Action Date: 03/07/2002	Action Time: 14:18:22.429	Action Data: No

Comments NO COMMENTS AVAILABLE



State Farm Fire and Casualty Company



Maryville Centre
PO Box 418059
St. Louis, Missouri 63141-8990

CERTIFIED MAIL

March 11, 2008

*Called
3/19/08*

Ford Motor Company
Office of the General Counsel
Parklane Towers West, Suite 300
Three Parklane Boulevard
Dearborn, Michigan 48126-2588

2008

RECEIVED MAR 14 2008

ATTN: SHAWN NORTON

RE:	Claim Number:	[REDACTED]	(Homeowner's claim) (Vehicle #1 - 997 Lincoln Towncar) (Vehicle #2 - 997 Ford F-150)
	Our Insured:	[REDACTED]	
	Loss Location:	Kansas City, Missouri 64110	
	Date of Loss:	03-02-05	

(over)

- 3/2/08
- '97 F-150
- VIN
- \$275,000.
- Kansas City, MO
- USD 9/21/96
- CSA - 4/14/08

Dear Ms. Norton:

Please allow this letter to serve as initial notice to you of a fire claim we are handling for the above referenced insured. Our insured and her family have experienced a fire loss to their home, personal property and two vehicles in the metro Kansas City area.

Our investigation, to date, indicates the origin of the fire is within the 1997 Ford F-150 pick-up truck.

This is a substantial loss, and I want to provide you the opportunity to inspect the scene prior to demolition, clean up, and rebuilding of the home. I am happy to hold the scene for a reasonable length of time to allow you the opportunity to have a representative of your company inspect it. However, I am unable to hold the scene indefinitely. You may also have the opportunity to examine the evidence, as well, although only nondestructive testing will be allowed at this time. It is anticipated this loss will exceed \$275,000.00. We anticipate repairs will begin soon. Our insured is anxious to start rebuilding her home.

As referenced above, in addition to the homeowner's claim, State Farm Insurance also insures two vehicles involved in this loss. I am your contact person for these two claims, as well.

Please contact me as soon as possible to arrange for an inspection, if you so desire. Arrangements can be made to inspect the scene and examine the evidence while accompanied by a representative of State Farm Insurance. Please do not contact our insured directly regarding this loss or inspect the scene and evidence without our permission, attendance, or involvement.

If no response is received within 7 days from the date of this letter, I will assume your representative is not interested in inspecting the scene or evidence.

IFTEF17L5V [REDACTED]

HOME OFFICE: BLOOMINGTON, ILLINOIS - 710-1801

MAR 11 2008 13:59

PAGE 02

ERR-885-LC1-2867

You may contact me at 314-439-3655 to discuss this loss in more detail or if you would like to make arrangements to inspect the scene and evidence. My office hours are Monday through Friday, 8:00 a.m. until 4:30 p.m., CST. This letter is being sent by fax with the original to follow in the mail.

Sincerely,



Angela King
Product Investigator
State Farm Insurance Companies
PO Box 419059
St. Louis MO 63141-9999
Tele- 314-439-3655
800-298-8082 ext. 855
Fax- 314-439-3650



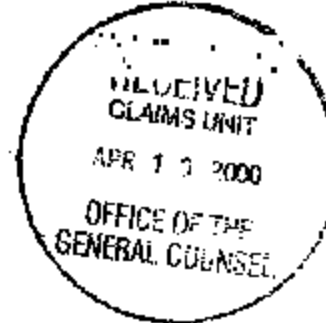
MARKET CLAIM OFFICE
P. O. BOX 13240
TYLER TX 75713-1040
PHONE NUMBER: 903-535-4000
OFFICE HOURS: MONDAY-FRIDAY 8:30-4:30

OK
Allstate
You're in good hands.

March 29, 2000

FORD MOTOR COMPANY
P O BOX 1904
DEARBORN MI 48121-1904

Allstate County Mutual Insurance Company
Claim Number: [REDACTED]
Our Insured: [REDACTED]
Date of Loss: [REDACTED] 2000
VIN: 1FTDF1767V [REDACTED]



CUSTOMER SUPPORT CENTER
2000 APR 10 A 7 52

This letter serves to give notice of the subrogation rights of Allstate Insurance Company regarding damages to a 1997 Ford F150 due to a vehicle fire. Further documentation will be transmitted seperately.

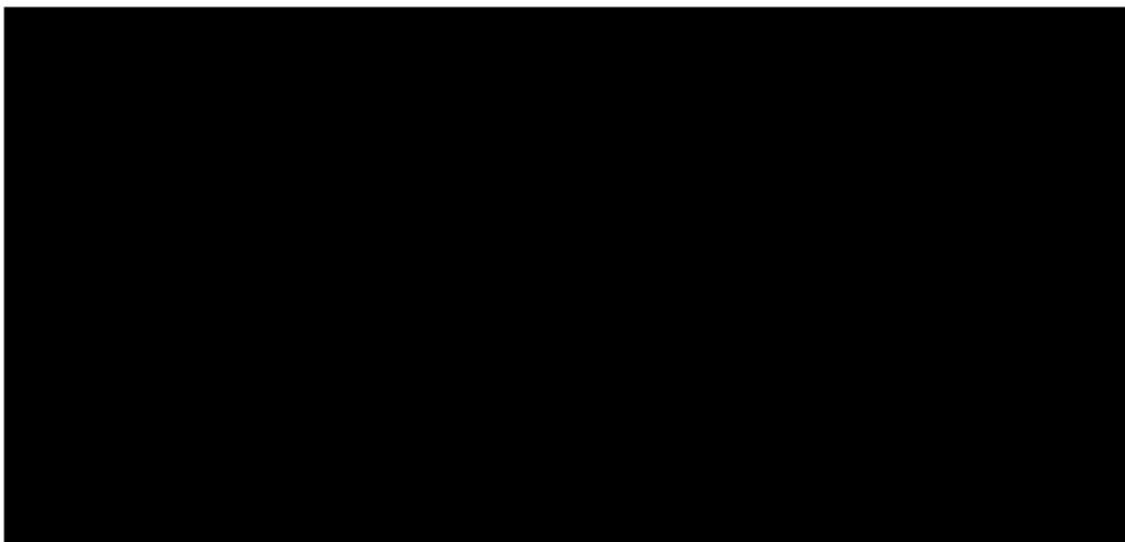
Evidence has been retained regarding this fire and is in the custody of Fire Cause Investigations in Tyler, Texas. If you wish to inspect this evidence, you will need to contact this office to make the appropriate arrangements. This evidence will be available for inspection for 90 days from the date of this letter.

Sincerely,

[Handwritten Signature]
JOHN ABRAMS
Allstate Property-Casualty Claim Service Organization

D

SN06/0/01/1



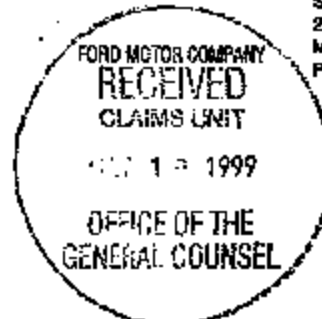
State Farm Insurance Companies



May 10, 1999

FORD MOTOR COMPANY
Attn: Howard Keyes-Mgr-Claims Dept.
Parklane Tower West Suite 400
3 Parklane Blvd.
Dearborn, MI 48126

State Farm Insurance Claim Office
2330 N. Causeway Boulevard
Mandeville, Louisiana 70471
Phone: 504-624-2300



RE: Claim Number: [REDACTED]
Data of Loss: April 17, 1999 VIN# 1FTRX1718W [REDACTED]
Our Insured: [REDACTED] Veh: 1998 Ford F-150

Dear Claims Manager:

The identified F-150 Pickup is insured by State Farm Mutual Automobile Insurance Company. This vehicle experienced a fire on April 4, 1999. At this time we are continuing our investigation of this incident and would like to give you advance notice of our potential subrogation claim. Thank you.

Sincerely,

A handwritten signature in cursive script that reads "Shepeta O'Conner".

Shepeta O'Conner
Claim Representative
(504) 624-2307

State Farm Mutual Automobile Insurance Company





Claims Service

P.O. BOX 809480
CLEVELAND, OHIO 44108
PHONE 216/886-3000
FAX 216/886-3053



January 10, 2002

Ford Motor Company
Office of General Counsel
Park Lane Towers West
Sta. 400
3 Park Lane Blvd.
Dearborn, MI 48126

RE: Our Insured: [REDACTED]
Claim # [REDACTED]
Date of loss: 12/2/01
Vehicle Involved: 1997 Ford F150 Pickup

Dear Sir/Madam:

Please accept this correspondence as confirmation of the following. During the course of our investigation, it has come to our attention that there was a recall in effect on this vehicle at the time of this loss. This vehicle caught on fire on December 2, 2001. We have had a cause & origin completed on this vehicle, and note that the recall # is 00V231000. While the claim is still pending, and the total amount of the damages have not been determined, we do anticipate that a subrogation action will be forthcoming. Therefore, we are requesting that you forward this letter to the appropriate parties for subrogation handling.

Should you wish to speak with me directly, you may reach me at (800) 829-2933 ext. 3341.

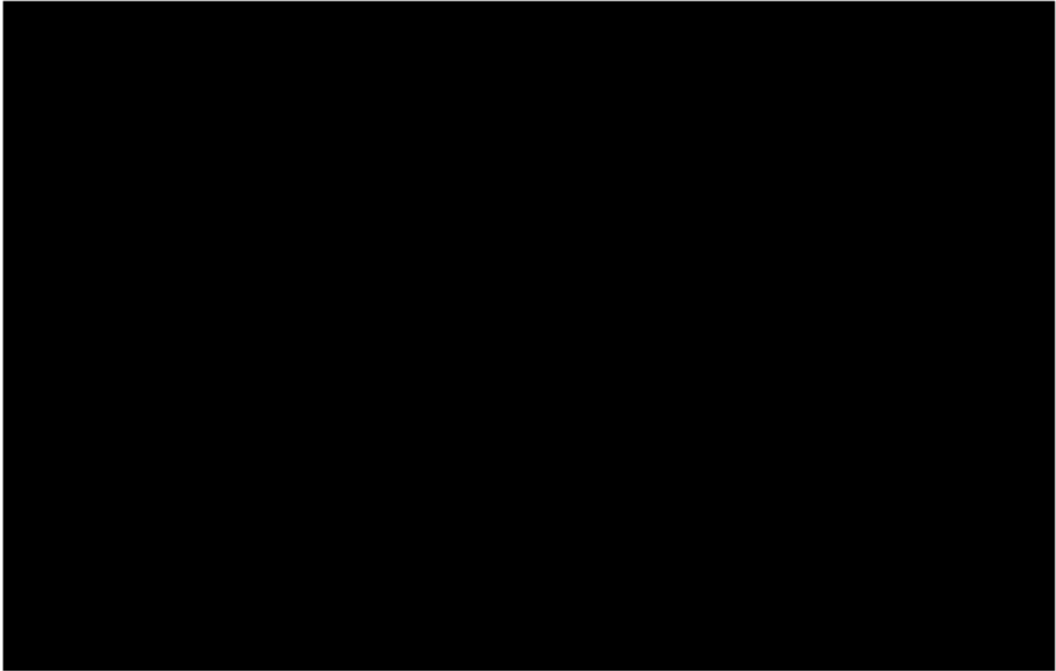
Sincerely,

Angi Mycoskie
SIU Adjuster
ABM/amm

CC: Subrogation

- 12/2/01
197 F-150

IFTDF-1728 VNB 40487



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



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

A PROFESSIONAL CORPORATION

SUITE 2100 301 SOUTH COLLEGE STREET CHARLOTTE, NC 28202-6037
704.376.3400 800.762.3579 704.334.3351 FAX www.cozen.com

MICHAEL A. DURR
DIRECT DIAL: (704) 348-3412
E-MAIL: MDURR@COZEN.COM

Friday, November 07, 2003

Shawn L. Norton,
Ford Motor Company
Office of the General Counsel, Suite 400
Parklane Towers West,
Dearborn, MI 48126

*via facsimile (313) 390-2107
and regular mail*

RECEIVED NOV 18 2003

Re: Insured: [REDACTED]
Loss Location: Birmingham, AL
Loss Amount: ~\$50K
Date of Loss: November 3, 2003
Claim No. 1003
Our File No.: 145457

Dear Ms. Norton,

Farmers Insurance Company has retained this law firm to protect its subrogation interest arising out of a recent fire loss at the home of [REDACTED] home is located at [REDACTED] in Birmingham, Alabama. The fire occurred on or about November 3, 2003 and originated in a 1998 Ford F150 before spreading to the rest of the home.

The loss site is still available for inspection; but demolition and reconstruction effects must begin shortly to minimize the interruption to [REDACTED]. A joint and final inspection of the premises has been scheduled for Monday, November 17, 2003 at 11:00 a.m. If you choose not to attend that inspection, you will lose the opportunity to inspect certain evidence.

You should know that Farmers may ultimately determine that Ford is legally responsible for the damage caused by the fire. Therefore, you should forward this letter to your liability carrier immediately to preserve your rights with that carrier.

Finally, please note that the [REDACTED] home is not an open loss site. Therefore, for evidentiary purposes, all investigations of the loss site must be coordinated and supervised by this office. Anyone inspecting the loss site without this firm's express written permission would be committing trespass. Removing evidence from the site without this firm's express written permission would be an act of theft.

CHARLOTTE/145457/74343.1

EA05-005-LC1-2072

Shawn L. Norton,
Ford Motor Company
Friday, November 07, 2003
Page 2

Please call if any of this is unclear. Thank you for your attention to this matter.

Sincerely,

COZEN O'CONNOR



By: Michael A. Durr



CHARLOTTE/149457/4543.1

EQMS-085-LC1-2673



MORRISON, MAHONEY & MILLER, LLP

COUNSELLORS AT LAW

230 SUMMER STREET
BOSTON, MASSACHUSETTS 02210-1181
617-439-7500
FACSIMILE: 617-439-7590

Lawrence A. Dugan
Phone: 617-439-7572
Fax: 617-342-4904
ldugan@mail.com-ml.com

MASSACHUSETTS	CONNECTICUT
BOSTON	Hartford
FALL RIVER	NEW YORK
SPRINGFIELD	New York
WORCESTER	
RHODE ISLAND	ENGLAND
PROVIDENCE	LONDON

February 24, 2003

**BY FACSIMILE AND
CERTIFIED MAIL/RETURN RECEIPT REQUESTED**

Office of General Counsel
Ford Motor Company
Three Parklane Boulevard
Parklane Towers West
Suite 400
Dearborn, MI 48126-2568



Re: Insured: [REDACTED]
Insurer: [REDACTED]
Date of Loss: February 17, 2003
Location of Loss: [REDACTED] Northford, CT [REDACTED]
Type of Loss: Fire
Type of Vehicle: 1998 Ford Expedition
VIN #: 1FMPU18L6W [REDACTED]
Our File No: 10007867

Dear Sir/Madam:

Please be advised that this office has been retained to represent that subrogation interests of the Hanover Insurance Company with respect to a fire that occurred at Holly Mar Hill Road, Northford, CT on February 17, 2003. Preliminary information developed by the Hanover Insurance Company indicates that the subject fire originated within a 1998 Ford Expedition owned by Hanover's insured [REDACTED]. The ensuing fire totally destroyed the subject Expedition, another vehicle and caused substantial damage to the single family residential structure and contents located therein.

The purpose of this correspondence is to place the Ford Motor Company on notice that if it is determined by the Hanover Insurance Company that liability for the loss rests with Ford, the Hanover Insurance Company will pursue all legal rights available to it to protect its subrogation interests, as well as the interests of its insured.

896916v1

ERRS-085-LC1-2874

MORRISON, MAHONEY & MILLER, LLP

Office of General Counsel

February 24, 2003

Page 2

The subject Ford Expedition has been secured by the Hanover Insurance Company. Should the Ford Motor Company wish to inspect the subject vehicle, kindly contact this office in order that appropriate arrangements may be made. If you have any questions, please feel free to telephone.

Nothing herein contained, nor any continued investigation by the Hanover Insurance Company or its representatives in this matter is intended to be, nor shall it be construed as, a waiver by the Hanover Insurance Company of any of its rights.

Very truly yours,

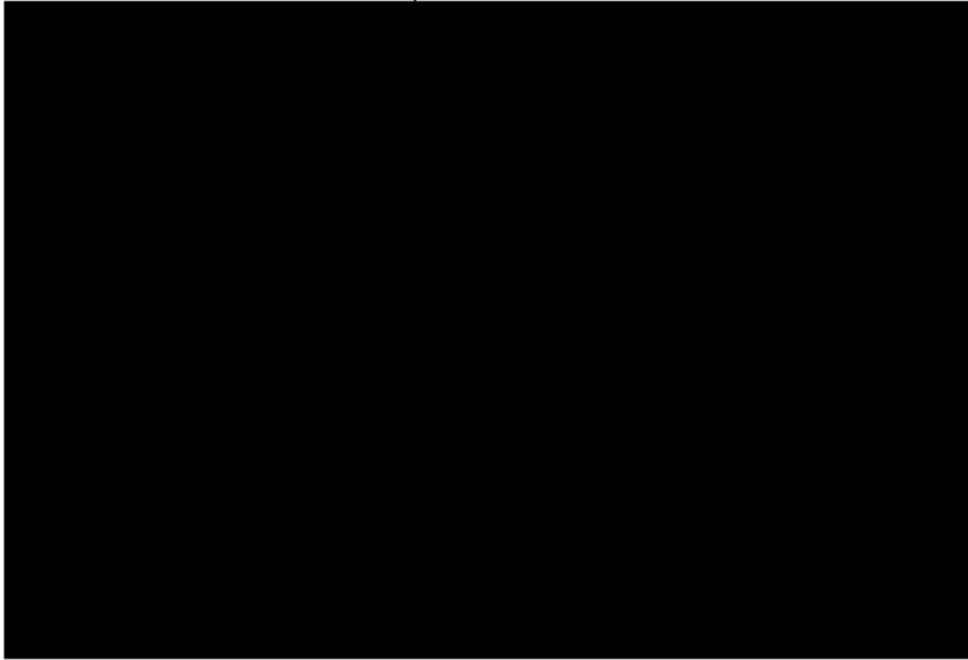
Morrison, Mahoney & Miller, LLP


Lawrence A. Dugan

LAD/jo

89016e1

EN85-005-LC1-2075



CULP & LITTLE
Attorneys at Law
11211 Katy Freeway, Suite 610
Houston, Texas 77079

- NEW -
(For Shawn)

Lloyd J. Culp
Russell G. Little

Telephone: 713/599-1000
Facsimile: 713/599-1007

September 7, 2004

RECEIVED SEP - 8 2004 SM

Via Facsimile

Ms. Shawn Norton
FORD MOTOR COMPANY
The Office of the General Counsel
Parklane Towers West, Suite 300
Three Parklane Blvd.
Dearborn, MI 48126-2568
FAX: 313.390.2107

Re: Claimant: Farmers Insurance as Subrogee of Scott Howard
Vehicle VIN No.: 1FMBU1761V[REDACTED]
Vehicle: 1997 Ford Expedition
Date of Fire: August 29, 2004
Location: Divise, Texas

Dear Ms Norton:

Please find the 17 digit vehicle identification number above. The vehicle is currently at the scene of the fire and it is being maintained and preserved for your inspection. However, because it is at the fire scene, it cannot be maintained indefinitely. Therefore, if you do want to see the vehicle on the scene, you must do so this week. I received your fax on Friday and called you twice that day and three times Tuesday, however, I have not received a return phone call yet. Please insure that you contact me today so that we can arrange the inspection if you are interested.

Sincerely,


Russell G. Little

RGL/srt

SEP 07 2004 15:01

713/599-1007

PAGE 02

EA05-005-LC1-2876



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



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

A PROFESSIONAL CORPORATION

2300 BANKONE CENTER 1717 MAIN STREET DALLAS, TX 75201-7315
214.462.3000 800.448.1207 214.462.3299 FAX www.cozen.com

April 27, 2004

Paul A. Grinke
Direct Phone 214.462.3885
Direct Fax 866.297.8473
pgrinke@cozen.com

VIA FACSIMILE (313) 398-2107, E-MAIL: SNORTON1@FORD.COM
AND CERTIFIED MAIL. RETURN RECEIPT REQUESTED
NO. 7803 0500 0002 8803 3869

Mr. Shawn L. Norton
Office of the General Counsel
Ford Motor Company, Suite 300
Three Parklane Boulevard
Dearborn, Michigan 48126-2568

Re: Liberty Mutual Insured: [REDACTED]
Claim No.: [REDACTED]
Date of Loss: 04-08-04
Location: [REDACTED], Broken Arrow, OK, [REDACTED]
Our File: TBD

Dear Mr. Norton:

Cozen O'Connor has been retained by Liberty Mutual Insurance Company in connection with a fire loss sustained by its insureds, [REDACTED] on April 8, 2004, at [REDACTED], Broken Arrow, Oklahoma. As a result of payments made and/or to be made pursuant to the insurance contract between the Warrens and Liberty Mutual, Liberty Mutual is entitled to assert claims against any third parties that may be responsible for the damages.

Our investigation revealed that the fire originated in the Warrens' 1997 Ford Expedition, which was parked in the insureds' garage on the evening of the fire. The fire spread from the Expedition to the home, causing substantial damages. As a result of this fire damage loss, Liberty Mutual will be called upon to pay in excess of \$250,000.00.

This letter is to place you on notice of Liberty Mutual's potential subrogation claim against Ford Motor Company for any and all damages that Liberty Mutual is called upon to pay, plus any deductible or uninsured losses sustained by the Warrens.

Please forward this notice letter to your insurance agent, your liability insurance carrier, and any other carrier with whom you may have insurance.

ER05-005-LC1-2877

Mr. Shawn L. Norton
Office of the General Counsel
Ford Motor Company
April 27, 2004
Page 2

We would like to provide you, your representative and/or insurance carrier an opportunity to inspect the fire scene and relevant evidence. At this time, the fire scene is still intact. However, as you may understand, the fire scene, as it now stands, creates a safety hazard, and Liberty Mutual has an obligation to mitigate the Warrens' damages by proceeding with demolition and reconstruction of the house. As such, time is of the essence.

Please contact me within ten (10) days of receipt of this letter to discuss this matter and how you plan to proceed.

If I do not hear from you by 5:00 p.m. Central Standard Time on May 10, 2004, we will assume that you are not opposed to us removing the evidence and releasing the fire scene.

Finally, please contact me if you believe additional parties should be notified of this loss. If you have any questions, please do not hesitate to contact me.

Thank you for your prompt attention to this matter.

Sincerely,

COZEN O'CONNOR


By: Paul A. Grinke

JDD/pq

DALLAS\1133662\1 99994.008

EA05-005-LC1-2878



MEMORANDUM

*New
(For Shawn)*

TO: Shawn Norton
FROM: Sue Flowers, Claim Representative
State Farm Insurance Companies®
DATE: July 2, 2004
SUBJECT: Ford Motors

RECEIVED JUL - 6 2004

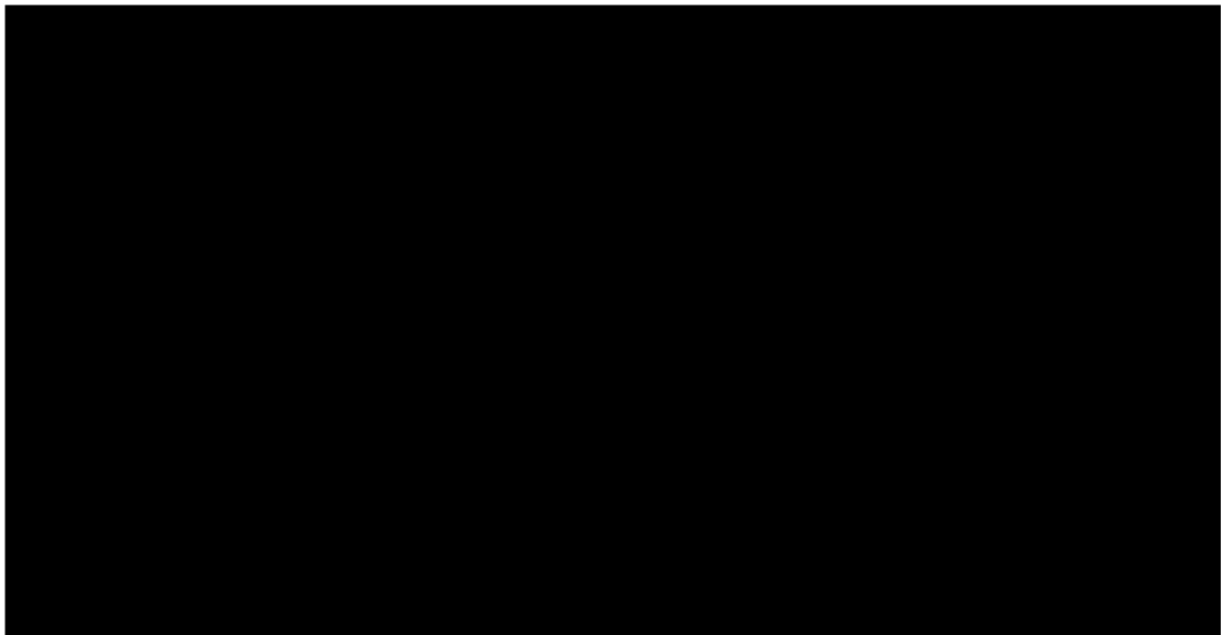
[Redacted]
Auburndale, Florida
Claim Number [Redacted] Homeowners claim
Auto claim

FORD MOTOR COMPANY
RECEIVED
CLAIMS UNIT
JUL 07 2004
OFFICE OF THE
GENERAL COUNSEL

On June 28, 2004, our insureds, [Redacted] had a fire occur in their home. It was determined by our fire investigator, Ward and Whitmore, the fire started in the insureds' 1997 Ford F-150. The VIN is 1FTDX176XVK [Redacted]. At this time, State Farm Insurance Companies® is putting Ford on notification of a subrogation claim. The vehicle is still located in the insureds' garage, untouched, awaiting your inspection. Please contact me at (863) 318-4152 to arrange an inspection with our fire investigator, John Haight, with Ward and Whitmore.

SF/020/0702014.124

duddy
- 197 F150
- 6/29/04
- WSD 4/26/97
- NO ESP
- V 1A



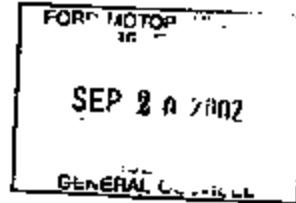
Freeport Field Claims Office
500 Economy Court
P.O. Box 444-0221
Freeport, IL 61032
(800) 854-8011

MetLife Auto & Home

September 18, 2002

Certified Mail

Ford Motor
PO BOX 6248
DEARBORN, MI 48126



Notice of Claim

Warning! Your access to evidence may be limited unless you respond immediately!

Your Product: 1998 FORD F150
Location of Loss: Northlake, IL
Peril: Fire

Date of Loss: August 27, 2002
Our Insured: [REDACTED]
Our Claim#: [REDACTED] MH

Attention Product Manufacturer:

This will sever as formal notice that the above-identified insurance carrier, on its own behalf and that of its insured, may bring a claim against your company for property damage arising out of a Fire that occurred the above listed location.

Our preliminary investigation indicates that you, either alone or in conjunction with others, may be responsible for the loss inasmuch as the available evidence and preliminary investigation points to the electrical malfunction as the origin of this loss.

You are hereby given the opportunity to examine the evidence before restoration is begun or the scene is otherwise substantially altered. Due to health and safety concerns involved in leaving the scene in its present state, as well as our insured's need to restore the property, there is only a very limited period of time that the evidence can be left undisturbed for your examination.

In addition to service by the US Postal Service, this Notice is also being sent by facsimile and/or e-mail to provide digital proof of service. You are strongly encouraged to acknowledge receipt of the Notice by return phone call as soon as possible if you wish to preserve your access to the evidence. However, your failure to acknowledge receipt of this Notice will not delay the time scheduled for restoration, cleanup or any other material changes to the evidence.

MetLife Auto & Home is a brand of Metropolitan Property and Casualty Insurance Company and its Affiliates, Warwick, RI

MPL MANUFACTNOTE

Page 1 of 2

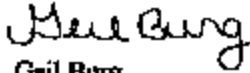
08/27/02
Northlake, IL
198 F150
Printed in U.S.A. 0908

FRA24202 MH

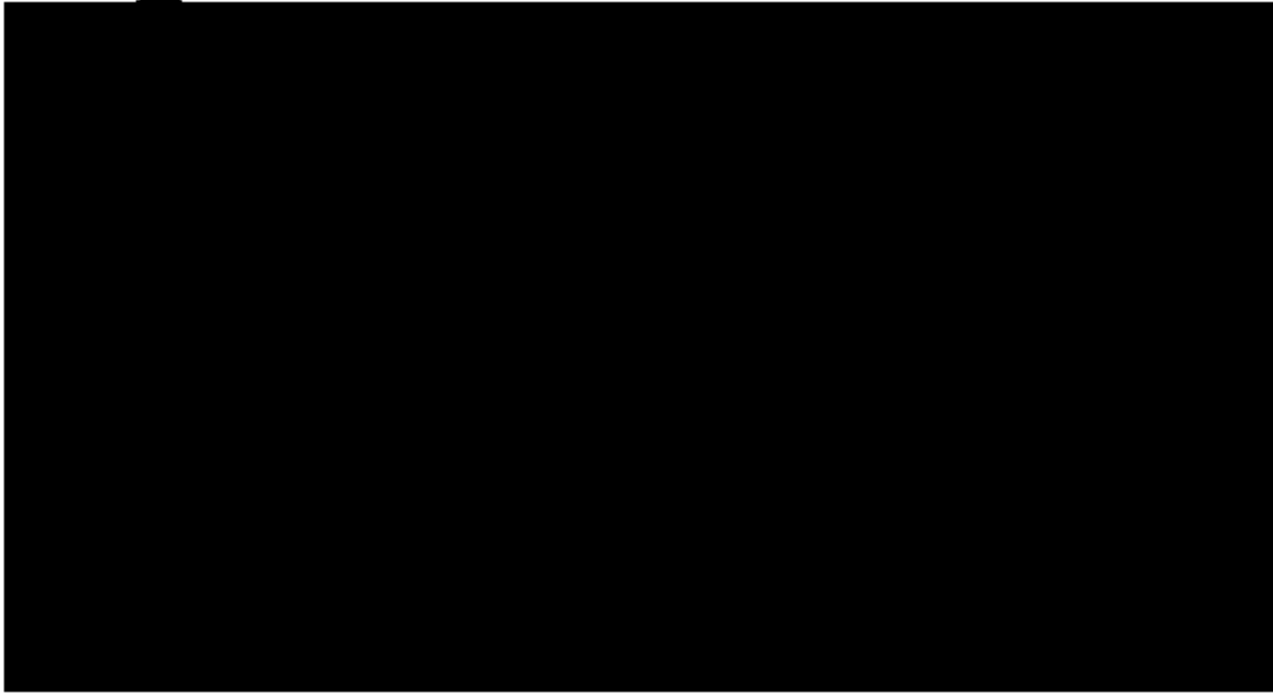
Questions regarding this notice, the claim or directions to the loss location should be directed to the undersigned.

Vehicle has been move to Insurance Auto Auctions in Aurora 630-896-5300 lot no 2027059

Sincerely,



Geil Burg
Metropolitan Casualty Insurance Company
Claim Adjuster
Ext. 7244





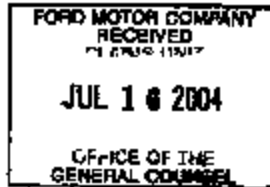
UNIVERSAL UNDERWRITERS GROUP
 Subrogation Processing Center - PO Box 29195
 Shawnee Mission, KS 66201-9195

JUL 15 2004

MEMBER COMPANIES

UNIVERSAL UNDERWRITERS INSURANCE COMPANY
 UNIVERSAL UNDERWRITERS SERVICE CORPORATION
 UNIVERSAL UNDERWRITERS ACCEPTANCE CORPORATION
 UNIVERSAL UNDERWRITERS INSURANCE SERVICES OF TEXAS, INC.

UNIVERSAL UNDERWRITERS LIFE INSURANCE COMPANY
 UNIVERSAL UNDERWRITERS OF TEXAS INSURANCE COMPANY
 UNIVERSAL UNDERWRITERS INSURANCE SERVICES, INC.
 UNIVERSAL UNDERWRITERS INSURANCE SERVICES OF ALABAMA, INC.



Ford Motor Company
 Parklane Towers West
 Suite 300
 Three Parklane Boulevard
 Dearborn, MI 48126-2588

July 14, 2004

By Next Day Delivery

RE: First Notice of Fire Loss of 7-10-04
 Place of Fire: Atlanta, GA
 Our Insured: [REDACTED]
 Policy Number: [REDACTED]

*- 7/10/04
 - Atlanta, GA
 - 197 F-150*

Dear General Counsel:

This letter is to advise you of a fire loss that occurred on July 10, 2004 at approximately 5:30am, at the business owned and occupied by [REDACTED] Inc. located at [REDACTED] Road, Atlanta, GA, [REDACTED] that involved a 1997 Ford F-150 pick up truck owned by a [REDACTED] of [REDACTED], Roswell, GA [REDACTED]

Preliminary investigation indicates that the cause and origin of this fire was within the Ford F-150. This vehicle suffered significant damage and we are unable to obtain the VIN # without destructive examination. The fire consumed the truck as well as part of the building and contents owned by our insured, [REDACTED]

The Ford truck has not been moved and has been taped off to preserve the evidence in the same setting and state when first viewed by our experts. In order for us to do a more comprehensive examination of this vehicle, it is important that a representative from Ford Motor Company be present as it may involve disturbing the integrity of the vehicle. Do

Please be advised that due to the fact that the remains of the Ford F-150 are located inside the burned building, we invite Ford Motor Company to have your expert be present at [REDACTED] Mill Road in Atlanta to examine and inspect along with cause and origin experts from Universal Underwriters Insurance Company as well as any other interested parties.

Larry Fuller

I request that you contact our cause and origin expert, Mark Whatley of Unified Investigations & Sciences, Inc. of 1555 Oakbrook Drive, Suite 135 Norcross, GA 30093, Phone number 1-770-246-0026 within the next 7 work days of this letter as to your intent to have someone at the site for a joint examination of the Ford F-150 in order to make the necessary arrangements. I personally will out of the office until Monday, July 26, 2004. Please make your arrangements for inspection through Mr. Whatley.

HO Subro ltr. IL.doc

A member of the Zurich Financial Services Group
 © Copyright 2002 Universal Underwriters Insurance Company

ER05-005-LC1-2882

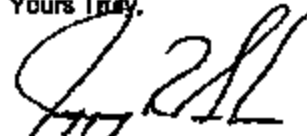
Ford Motor Company
Office of General Counsel
July 14, 2004
p.2

Due to the need to begin repairs to our insured's building and to assist in regaining productive business, I appreciate your prompt response to this notice of fire loss that involved a Ford Motor Company product.

I will be in the office through Thursday, July 15, to leave July 16 and be gone until Monday, July 26, 2004.

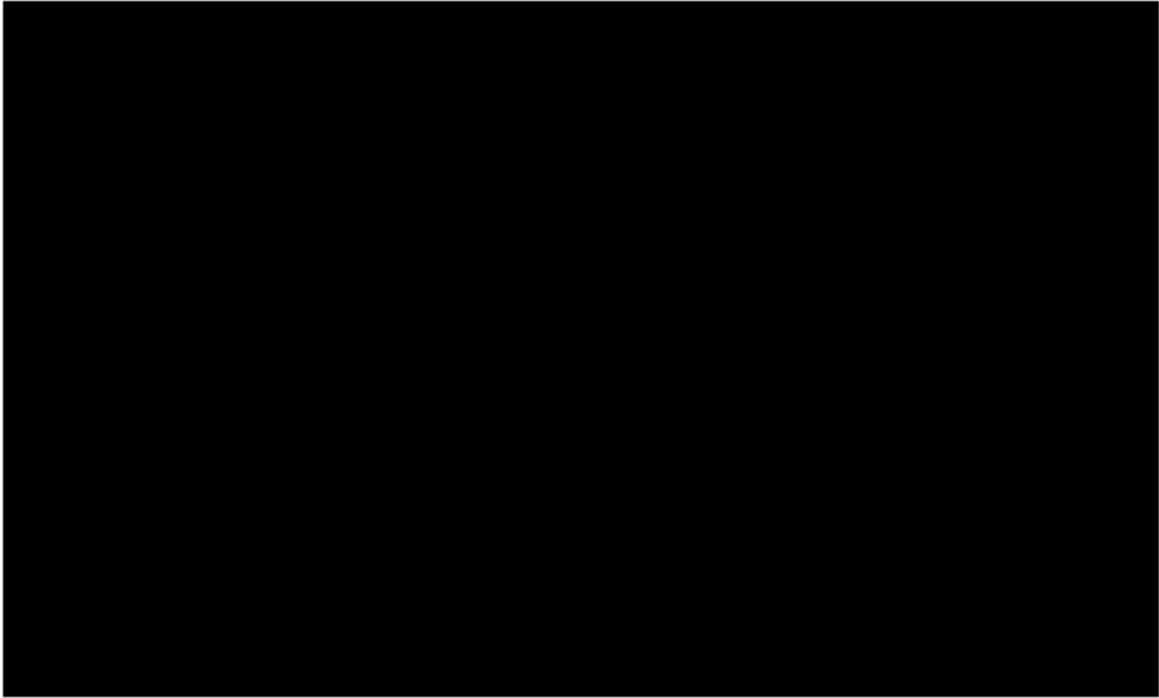
Your consideration of this notice and request is appreciated.

Yours Truly,



Jeffrey R. Brooks, JD
Subrogation-Litigation Analyst
PHONE: 1-913-864-4263
FAX: 1-913-906-1777

Cc: Mark Whatley
Fax 1-770-248-9438





EROS-005-LC1-2884



EA95-689-LC1-2885









Debt Recovery Consultants

Susie Davis

Sr. SUBROGATION SPECIALIST

PHONE: (909) 526-6846
FAX: (909) 879-4378
ds@dtccollect.com
www.dtccollect.com

4225 VALLEY FARM DR.
SECOND FLOOR, SUITE 205
SHE VALLEY, CALIFORNIA 91761

800-871-2183 x 265

DEBT RECOVERY CONSULTANTS
4225 VALLEY FAIR STREET, SUITE 205
SIMI VALLEY, CALIFORNIA 93063
(805) 526-0646

11/27/01

FORD MOTOR COMPANY
SHAWN NORTON
3 PARKLANE BL#300 W.TOWER
DEARBORN

MI. 48126-2568

P

452648
Cl

Re: Our File No. : [REDACTED]
Claim No./Insured : [REDACTED]
Date of Loss : 03/29/01
Accident Location :
Your Insured : FORD
Your Claim No. : [REDACTED]
Demand Amount : 17,132.28

*- own
- ext's opinions
- photos

To whom it may concern:

Our office represents FARMERS COE
with its subrogation claim against your insured.

, in connection

To assist you in the evaluation of this demand for payment, copies
of the items marked below are enclosed herein:

- Property Damage Estimates and/or Estimates of Repairs.
- Photographs. *only*
- Payment Drafts.
- Police Report and/or Incident Report.
- Witness Statement.
- Medical Specials.
- Additional Supporting Documentation.

Demand is hereby made in the amount of 17,132.28 for damages
paid. Please forward your draft made payable to DRC -or- DEBT RECOVERY
CONSULTANTS as Subrogee agent for FARMERS COE. If you
have any questions regarding this matter, feel free to contact the
undersigned toll free, 1-800-871-2183.

Sincerely,
DEBT RECOVERY CONSULTANTS



Susie Davis
Subrogation Collections Department

THIS COMMUNICATION IS BEING SENT TO YOU BY A COLLECTION AGENCY.
ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.

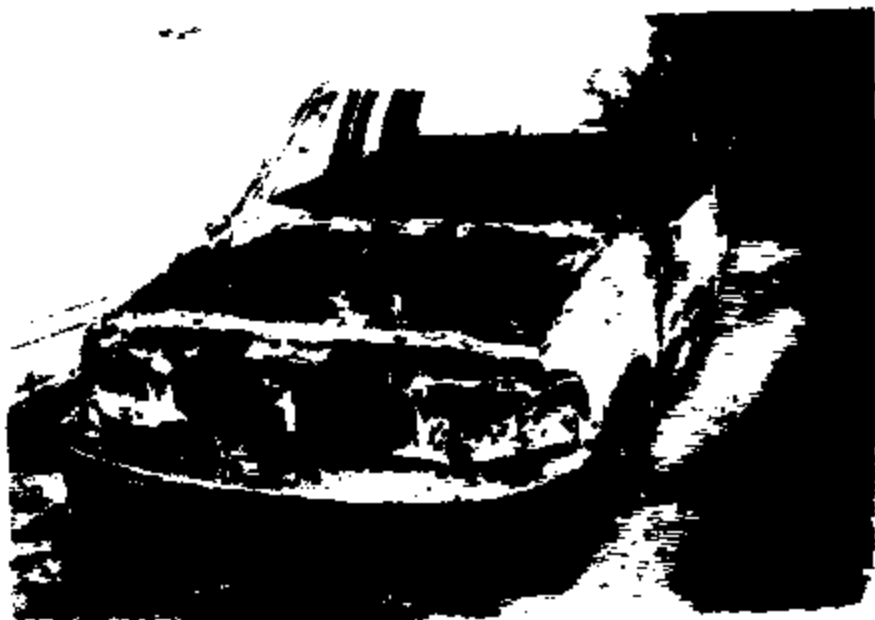
P.S. I will mail you the color's picture.



EROS-695-LC1-2898



EA05-005-LC1-2891



EP85-088-1.C1-2892

1. TYPE 13000		CALIFORNIA FIRE INCIDENT REPORTING SYSTEM INCIDENT REPORT COVER SHEET Imperial County Fire Department				2. INCIDENT NUMBER 01200101-000	
3. OCCURRENCE DATE 01/21/2001		4. REPORTING AGENCY 1111-00	5. INCIDENT TYPE 1300-00	6. LOSS TYPE 1300-00	7. LOSS AMOUNT 1300-00	8. CITY OR COUNTY 2001	9. INCIDENT STATUS REL
10. INCIDENT TYPE AND LOSS TYPE TYPE 13 1300 LOSS TYPE 1300							
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Fri Jun 0 12:02:15 2001

RECEIVED

PAGE 1 of 3

ST-18(1/91) DEPARTMENT OF FORESTRY AND FIRE PROTECTION FIRE REPORT

900 K6

State: CA Year: 2001 Incident #: RRU-021280 File #: 12089 Exposure #: 000

Fire Name : LOCAL ANGST

FDID : 13090, HIVERSIDE COUNTY FIRE DEPARTMENT

State: CA, CALIFORNIA

Year: 2001

Order Agency #: RRU-021280

Protect Resp: 9.0, MISCELLANEOUS/OTHER

Auto-Mutual-Aid : 4, MUTUAL AID PROVIDED TO ANOTHER FIRE DEPT

Situation Found #1: 14.0, FIRE IN MOBILE PROPERTY WHILE OUTSIDE A STRUCTURE

Situation Found #2:

Situation Found #3:

Situation Found #4:

Incident Address Location:

Rm/Apt: Zip Code:

Contax:

Temp:

Weather:

Dispatch Level:

Code:

Name (Last, First MI):

Rm/Apt: City:

Telephone Number:

Addr:

State: Zipcode:

Code:

Name (Last, First MI):

Rm/Apt: City:

Telephone Number:

Addr:

State: Zipcode:

1/4 Section: Sec. 1

Township:

N/S:

Range:

E/W:

Base/Meridian:

Response Area:

Battalion:

PHSX:

Prop Mgmt:

General Property Use:

Specific Property Use:

Building Code:

Structure Status:

Occupied:

Mobile Property:

Yr Make

Model

License # St

IF

MOBILE

PROPERTY

INVOLVED

Vehicle Identification Number Permit # Drivers License # St

Record ID : Yx-2001 IncR-28U-0212ND Fire#-12089 Expl-000

2 of 3

SECTION B Date and Time

Estimated Start :
 First Report : 03/29/2001 17:02:00
 Method of Alarm : 4 ,RADIO
 Lockout :
 Second Report :
 Method of Alarm :
 Lockout :
 First Enroute : 03/29/2001 17:02:00
 First On Scene : 03/29/2001 17:26:00
 Contained : 03/29/2001 17:26:00
 Controlled : 03/29/2001 17:26:00
 End Time : 03/29/2001 17:26:00

SECTION C Casualty

Fire Service	Injuries:	0	Fatalities:	0
Non-Fire Service	Injuries:	0	Fatalities:	0

SECTION D Completed for all fires

Billable Fire : No

SECTION E Total Resources

Schedule A Engines:	1	Federal Engines	:	0
Schedule A Truck :	0	Emergency Fire Fighters	:	0
Schedule A Squad :	0	Other Local Agency	:	0
Schedule B Engines:	0	Overhead	:	0
Schedule B Drivers :	0	Call when needed Helicopter:	:	0
CDF Fire Crews :	0	Helicopter	:	0
Air Attack :	0	Private Equipment	:	0
Air Tanker :	0	Paid Persons	:	2
Fire Crews :	0	Volunteers	:	1

Record ID : Yr-2001.Inch-RRJ-021285 Fire#-12089 Rpt#-000

3 of 3

SECTION K Comments

THIS WAS A REPORTED VEHICLE FIRE IN PALO VERDE FIRE DEPARTMENT'S RESPONSE AREA. WE WERE CANCELLED ENROUTE BY P.V. FIRE. WE NEVER ARRIVED ON SCENE.

Type Of Action Taken #1 : 98 ,NO ACTION TAKEN

#2 :

#3 :

#4 :

Special Studies:

SECTION L Reporting Officer

Name : KLIMAS, TOM J.
Title : FE, FIRE APPARATUS ENGINEER
Date : 03/30/2001

THE UNDERSIGNED HEREBY CERTIFIES THIS REPORT IS A TRUE COPY OF THE RECORD ON FILE

Signature : *James M. Chapman*
Title : *Assistant of Records*
Date : *6-8-01*

but did not give him a number or a copy. He said that the sheriff also came out, which he believed to be the Imperial County Sheriff's Department. He said that a CHP officer also stopped, but neither one filed a report since it was not an accident. Although the insured's English is limited, he answered all of my questions sincerely and without hesitation. He would make a good witness on his own behalf.

Mark Barth - Mr. Barth is the service writer from Blythe Ford Center, who replaced the transmission in the insured's truck. He did not know about the fire initially, but as soon as I told him what I was calling about, he became somewhat hesitant in his responses, as he was no doubt worried about our subrogation possibilities. The insured's wife had faxed me a copy of the repair order for the transmission and that is the only work he showed on the computer. The insured had told me that they had also replaced the spark plug wires, but he said that whoever he talked to at Ford, said that this was on the QT.

WITNESS STATEMENT:

Witness Identification and Evaluation

I obtained the statement of [REDACTED] through an interpreter on May 14, 2001. He works with the insured as a painter's helper. He has known the insured for about 2 years and considers him a good friend. [REDACTED] Blythe, CA. His phone number is [REDACTED]. [REDACTED] answered the questions without hesitating and his version of the facts was very similar to what the insured told me. He would make a good witness on his own behalf.

Version of Loss

[REDACTED] said that the insured had been having problems with his truck jerking. He said that he had asked him to go to the Ford dealer in Calexico on the date of loss. They had left work about 5:00 PM and were traveling on Highway 78. They had gone up one hill and when they were going up the second hill, which was steeper, the insured told him that the truck was jerking. He could feel it himself and the insured pulled over to the side of the road. He said it smelled like smoke. The insured pulled the hood release and smoke began pouring out of the side of the hood. They got away from the truck and it began burning. He said that a farmer stopped by and had a cell phone. He called 911. He said that it took about an hour for the fire department to arrive. He believes that they came from Palo Verde. He said that the sheriff showed up later and then finally a CHP officer showed up. He did not know if any of them filed a report. He said that the insured did not have any flammable liquids in the truck. He also stated that as far as he knew, the insured had nothing to do with the cause of the fire.

DISCREPANCIES AND CONCERNS

I did not find any discrepancies with the insured's story, the witness's story or what the service writer told me. The one exception would be the replacement of the spark plug wires, but that was apparently done on the side without an invoice being written up.

Confidential. For company use only.

FOLLOW-UP INVESTIGATION

The adjuster may wish to see if the Palo Verde Fire Department wrote up report on the fire. If any additional investigation is warranted, please contact me at (800) 527-3907, extension 8794. I am closing my file at this time.

Best Regards,

Thomas B. Niblack
Senior Special Investigator

cc: Tom Newell, FCLS
Special Investigations Manager, SCSC

Confidential. For company use only.

BARNETT AUTOMOTIVE ENGINEERING



RECEIVED

3055 Hayes Ave. • 92506 Mesa, California, 92527
Phone (714) 444-3224 • Fax (714) 444-3054

APR 24 2001

BCO K6

April 19, 2001

Mr. John Grimes
Farmers Insurance Group
PO Box 1326
Rancho Mirage, Ca.
92270

File Name: [REDACTED]
Claim Number: [REDACTED]

VEHICLE INSPECTION

Vehicle Make: Ford
Model: F150
Year: 1998
VIN: last six---B81187
Miles: Not Available

Gregory J. Barnett, Consultant, was retained to inspect the subject vehicle specifically to ascertain the cause and origin of the fire which occurred on the date of loss.

On 4/16/01 this expert proceeded to Insurance Auto Auctions located at 2800 S. Trade Ave., Riverside, Ca. where the subject vehicle was produced for inspection.

The fire had consumed the entire vehicle. There was evidence of a 1000+ degree fire from bumper to bumper. Although every flammable fluid equipped on the subject vehicle had ruptured and burned, this expert finds this burn pattern and burn temperature suspicious.

It should also be noted that the subject vehicle is equipped with SMC composite bed-side panels. This material does burn well once up to burn temperature. It contributes both to an unusual burn pattern on the bed and causes the fuel tank to ignite.

Mr. John Grimes

Claim Number: [REDACTED]

Page Number 2

One of the most unusual features of this burn pattern is the extreme consumption of aluminum throughout. All of the steering column, cooling system, and entire contents of HVAC system are completely consumed. This indicates that the fire characteristics were capable of generating and maintaining temperatures of 1000+ degrees Fahrenheit around and under the cooling system and throughout the cabin. Normally, there is some portion of the A/C condenser and/or radiator left in the rubble. The residual coolant in the radiator will tend to maintain the radiator's structure until the system ruptures and leaks the coolant out. These were completely obliterated. Even the heavy castings on the engine such as the water pump, intake manifold, cylinder heads and accessories were either obliterated or badly melted. The aluminum hood was completely destroyed except for a small 6" piece by the right hinge. Typically, there is some larger pieces of the hood remaining in Ford fires even when a major engine fire had taken place.

Another observation this expert makes on the burn pattern is the lack of a single square inch of paint being left anywhere on the vehicle. The vehicle burned on top, on the underside, and from bumper to bumper. Typically, there is some paint left somewhere on the body even when the fuel tank ruptures. The vehicle is usually parked by the time the fuel tank ignites. The liquid gasoline will flow away from the vehicle in the direction of road drainage (if any). This causes a burning of one side more than the other. Paint does not make good fuel. It must be burned by some outside force of a 650+ degree nature. Hence, it tends to resist burning at the colder points in a vehicle fire.

The construction of the subject vehicle is such that dashboard penetration is nearly impossible. Except for one small union plug located on the right side, the firewall is virtually solid. The HVAC system does not sit on both sides of the firewall as it does on other Ford products. It does not have a large penetration site whereby fire can enter the cabin area easily. The firewall is constructed such that it takes the fresh air from a large duct on the cowl area. Basically, the firewall is a solid sheet of steel with a square air duct laying across it's top. If the fire started in the engine area, it would have melted the aluminum hood and stopped spreading before it could penetrate the cabin area and begin working rearward. Essentially, what the subject fire does not show is a typical radiant spread of the fire working from one end of the vehicle to the other. Fire wants to burn upwards not laterally. It must be forced by fuel path to do anything but burn upward. This is both an anomaly and a red flag.

It should be noted that the composites equipped in the subject vehicle are FMVSS #302 compliant. Essentially, this safety standard states that the materials which make up the vehicle cannot support a flame front of greater than 102 mm per minute. The fire cannot penetrate deeper than 13mm per minute. The materials which make up a modern vehicle resist ignition and do not burn well.

After inspecting the subject vehicle this expert formed the opinion that this vehicle fire is suspicious in nature. Although there are accelerants normally present in the form of gasoline,

Mr. John Grimes

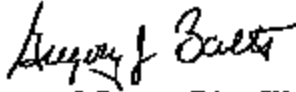
Claim Number: [REDACTED]

Page Number 3

transmission fluid, power steering fluid, and brake fluid, this expert finds that the burn temperature and burn patterns extreme. The consumption of composites, paint, and aluminum were also extreme. Even if allowance is made for the subject vehicle having a nearly full tank of gasoline, the consumption of composites and non-ferrous metals indicates that a fire occurred which was of greater magnitude than the flammable materials present are capable of supporting. *

The opinions expressed in this report are based upon direct observation, personal measurements taken, testing, and a review of the available evidence. This expert reserves the right to add to, subtract from, or modify any existing opinion in the event that additional evidence becomes available.

Respectfully Submitted,



Gregory J. Barnett, BS, ASE
Automotive and Heavy Truck Consultant

SUMMARY OF THE EXAMINATION UNDER OATH OF
██████████

The examination under oath of ██████████ took place on June 13, 2001 in Blythe. ██████████ was not represented by counsel. The proceedings were reported by Egglé Court Reporters. *BLD/KE*

Impression Of The Witness

██████████ makes a good impression as a witness. He understands some English and seemed very relaxed and friendly. He was well prepared and brought with him all of the paperwork which had been requested, as well as other documents.

Background

██████████ lives with his mother and father, brother and sister, wife and child in Blythe. He and his family used to live in Mexicali and, in fact, still have a house there. He states that his mother teaches school part of the week in Mexicali and stays in the Mexicali house. ██████████ testified that his mother usually leaves from Mexicali on Wednesday and returns to Blythe Saturday or Sunday. ██████████ drives the Astro van as transportation.

██████████ brother, ██████████, was the first to come from Mexicali. He was then followed by ██████████ and the rest of the family came a few weeks later. ██████████ testified that he attended technical school in Mexicali, where he studied welding and electricity. He claims that neither he, his father or ██████████ have ever been arrested.

Purchase Of The Truck

██████████ testified that the truck was purchased July 25, 1998. He had been looking for a car, but decided to buy the truck when he saw it. He claims that the Toyota he had before the truck was insured with your company. He claims to have had no claims with your company while he had the insurance.

██████████ freely admitted that he had a credit problem at the time the truck was purchased. He claims that someone used his identity and caused him many problems. At the time of the truck purchase, he was working at Kennedy Tire in Brawley, and had been there for two years.

The purchase price of the truck was \$21,200, and the monthly payment was \$487. ██████████ did not think that that payment was particularly high. He testified that his income at that time was between \$1,200 and \$1,300 per month and he was married at the time. He said that his wife sold cakes out of the house and made \$1,000 a month selling the cakes. Currently, his wife is a student, but does some clerical work at Palo Verde College. He states that his income currently is \$1,800 per month, and his wife's is \$480 per month. His bills include \$100 for his share of utilities, \$142 for his share of the mortgage, \$160 for food, \$80 for gasoline and \$120 - \$130 for child care. He has other

Summary Of The Examination Under Oath Of

Page 2

miscellaneous expenses, but does not have any credit cards. [REDACTED] states that he does not know anyone who has had a car repossessed or whose car has caught fire.

[REDACTED] testified that his dad may have driven the car between 10 and 20 times. He states that no one else drove the car, not even his wife. When asked what he had replaced or repaired, [REDACTED] testified that he had replaced the tires, and had added plastic floor mats in the back of the cab. He also added a hitch. There were no seat covers on the seats at the time of the fire. The seats in the truck were covered in fabric and had a vinyl bottom. The bed liner was made of plastic. He states that at the time of the fire, there was nothing at all in the bed of the truck. All that was in the interior of the truck were some papers in the glove compartment. Neither he nor [REDACTED] smoked and there was no lighter in the truck. There was no extra gasoline or anything of a flammable nature kept in the cab. He did not know how many gallons the gas tank held, but stated that his usual fill up amount in March was \$40. He did not know when he last purchased gas, but estimated there was about 3/4 of a tank of gas in the car.

Problems With The Truck

The truck was purchased at Calixico Robinson Ford. He had some service done there and also at the dealership in Blythe. He claims that he never had it serviced elsewhere. He claims that the problems with the truck started at the end of February, although when later shown some receipts from a tune up place, he admitted that the problems may have started earlier that month. [REDACTED] testified that the problems consisted of the truck jerking and pulling back and forth. It started when he was driving up hills and then began to occur anytime. At first, he thought the problem was related to the air conditioner. A few days after first noticing the problem, he took the vehicle to the Blythe dealership to be checked. When he returned, he was told there as nothing wrong with the truck. He took the service person out for a ride to show him what was wrong. They then replaced the oil to see if that was the problem, but the problem remained. He returned and was then told that he may need to have the transmission replaced. The transmission was still under the extended warranty that he had purchased. Oddly, [REDACTED] never had the car serviced on regular intervals. After the transmission was replaced, there was still a problem. Someone at the dealership then replaced the spark plugs, but the problem remained. He believes he was at the dealership between four and five times. On two occasions, he was given loaner cars and he paid a total of \$50 for the rental cars. The last time he was at the Blythe dealership, he was told that the problem might be the electrical wires so he paid to replace the electrical harness. When there was still a problem, the Blythe dealership told him there was nothing more they could do and to perhaps drive the truck and the problem might go away. He testified that he didn't like that solution, so he called the Calixico dealership, who then told him that it had to be solved in Blythe. Finally, they relented, and told him to bring the vehicle there. He claims that he asked the salesman if he could have it towed, but they told him to drive it anyway. He states that he spoke with the salesman "Manny" and that he was promised a loaner vehicle and expected to pay the \$50 charge.

Summary Of The Examination Under Oath Of

Page 3

testified that he had worked at Morgan for a year and four months. His shift matched that of his father and brother and which was 6 a.m. to 2:20 p.m. He stated, similarly to his father, that he usually went to work in his brother's vehicle. He states that he met through his brother. was laid-off June 4 and is currently not working, although he has a job prospect. seemed very embarrassed that he had been the one who was laid-off and not his father, brother or friend.

Circumstances Surrounding The Loss

testified that he left between 3:30 and 3:40 on March 29, 2001 to go to Calixico. He first went by to pick up . He testified that the engine was missing and it seemed that it was happening every five minutes or less, and that the jerking was getting worse. He and took the 78 and were on that road about 25 minutes before the fire. He thought that the last exit was Palo Verde and the next one may have been Glamis. He said that the problem happened when they were in the first set of hills. testified that he smelled something burning, but couldn't get off the road. He states that the windows were down and he was not using the air conditioner at the time. He states that he saw no smoke and the temperature gauge was okay. When he reached a shoulder area a few minutes later, he pulled to the side, but did not turn off the engine. He states that the surface was flat but may have been inclined slightly. He then pulled the hood latch and saw smoke coming from the sides of the hood. He described the smoke as being dark black in color. At the same time, he saw yellowish-orange flames shoot out about 6-8 inches from each side of the hood. He claims that he did not try to open the hood and he and his friend ran to a safe distance behind the truck.

testified that they waited about 20 minutes for someone to come by. A passer-by stopped and used their cellphone to call his father. He stated that there was a bad connection and he had to walk around to get the cellphone to work. He states that the fire burned for between 30 and 40 minutes before the fire department arrived and when they arrived, there were just some small flames by the tires. He states that he and did not try to put out the fire.

testified that the fire burned slowly from the hood to the back. He heard several explosions while the fire burned. He testified that it took 40 minutes for the fire to completely consume the truck. He denied that he and his friend did anything to help the fire along.

testified that his father arrived before dark to take them back home. He denied that the vehicle had ever been for sale. He says that he did not have any accidents in the truck and has never made a previous claim. He states that the truck was in good condition, although there was a dent at the end and a scratch on the top. He claims to have no idea of the truck's value, as he was not looking around for a new truck at the time. He claims to have no idea how the fire started. He states that he was

Summary Of The Examination Under Oath Of
[REDACTED]

Page 4

never behind in his car payments. He did not know if the problem would have been covered under the extended warranty.

[REDACTED] testified that he purchased a used car at the beginning of April. He purchased a 1990 Mitsubishi Mirage from a relative who buys and sells cars. He paid \$1,800 cash for the vehicle. He obtained the money from his bank and from his tax return. [REDACTED] produced a bank statement which shows his automatic deposit from his paycheck. He does not have a savings account. [REDACTED] made the car payment on the 24th before the fire and also paid for the month of April. He states that the salesman at the dealership encouraged him not to pay thereafter. He explained that the reason his payments were made in person was that his mother went by the dealership on her way to Mexicali and she would drop off the payment. His dad made the last payment as he accompanied the mother at that time.

[REDACTED]

CLIENTS COPY
DICTATED BUT NOT READ

SUMMARY OF THE STATEMENT UNDER OATH OF

RECEIVED

The examination under oath of [REDACTED] took place on June 13, 2011 in Blythe. [REDACTED] was not represented by counsel. The proceedings were reported by Eggli Court Reporters.

BOOK 6

Impression Of The Witness

[REDACTED] did not appear nervous for his statement. He made a good impression as a witness and came across as open and forthright.

Background

[REDACTED] lives in [REDACTED] Way in Blythe. His telephone number is [REDACTED]. His date of birth is [REDACTED] and his driver's license No. is [REDACTED].

[REDACTED] lives with his parents. He claims he has never given sworn testimony before and has never been arrested. He has known [REDACTED] for two years and met him through [REDACTED]'s brother. [REDACTED] currently works at Morgan, he has been there four years and he works the same shift as [REDACTED] father.

[REDACTED] testified that he was only in the truck once or twice and never drove it. He describes his relationship with [REDACTED] as being good friends.

[REDACTED] testified that [REDACTED] asked him to accompany him to Calixico. [REDACTED] had told him about the problems with the truck. [REDACTED] told him that the truck was jumping and pulling. [REDACTED] personal theory was that the problem was the fuel injection. He states that [REDACTED] had been told that the problem might be the electrical system.

[REDACTED] testified that when [REDACTED] picked him up, he did not hear any unusual sounds and did not notice any problems until they were about 30-45 minutes out on their trip. At that time, the problem started when they were on the 78 going uphill. [REDACTED] could feel the truck jerking and pulling and the problems worsened as they went up more hills. He then smelled something that smelled like burning rubber. There was no place to pull over, so [REDACTED] drove with the problem continuing for about 2-3 minutes. When the shoulder appeared, [REDACTED] pulled over. [REDACTED] testified that before [REDACTED] pulled the hood latch, and while the vehicle was still rolling, [REDACTED] saw black smoke coming from under the hood. He testified that he saw just a little smoke but could see it nonetheless. [REDACTED] then left the engine on, but pulled the hood latch. When the hood was opened slightly, smoke poured out from all sides. [REDACTED] only saw smoke and did not see any flames. He testified that it was about 5-10 minutes until he later saw flames. He indicated that [REDACTED] tried to open the hood, but there was too much smoke to do so. He and [REDACTED] then ran behind the truck for safety and did not try to put out the fire. Here he states it was about 20 minutes until someone came by. He first saw flames between the front of the car and the windshield. He next saw flames inside the cab and then in the back. He thought it was about 1 1/2 hours until the fire

Summary Of The Examination Under Oath Of
[REDACTED]

Page 2

department arrived. By then, the fire was already out, although he believes the fire department put water on the truck.

[REDACTED] testified that a farmer came by and loaned [REDACTED] a cellphone. Either [REDACTED] or the farmer called the sheriff. [REDACTED] called his father and asked for a ride home. They waited about an hour for the father to arrive.

[REDACTED] testified that there was nothing in the bed of the truck. He could not recall anything in the cab of the truck, except a few cassettes. Some cassettes were on the seat and others were on the dash. He testified that when the truck was parked, it was on a slight incline. He recalls there being about a half a tank of gas. He recalls [REDACTED] asking him before they started out whether that would be sufficient gas to get to Calixico. [REDACTED] testified that the air conditioning was running at the time of the fire and the windows were up. When told that [REDACTED] had testified differently, Jorge stated that he thought that was the way it was, but he was not certain.

[REDACTED] testified that he has never known anyone whose car has burned. He does not have any experience in the vehicle industry, except that he once worked in a farm equipment shop. [REDACTED] has three vehicles, which are all insured with your company. He claims to have made no insurance claims. [REDACTED] did not know if the truck was ever for sale. While the fire was burning, he heard about three explosions.

[REDACTED]

CLIENT'S COPY
DICTATED BUT NOT READ

SUMMARY OF THE EXAMINATION UNDER OATH OF [REDACTED] RECEIVED

JUN 12 2001

The examination under oath of Jose Delapena took place on June 13, 2001 in Blythe. [REDACTED] was not represented by counsel. The proceedings were reported by Egli Court Reporters.

Impression Of The Witness

[REDACTED] makes a nice appearance as a witness. There were times, however, when he seemed very irritated to be presented and irritated by the questioning. Nonetheless, he was cooperative throughout his statement.

Background

[REDACTED] lives at [REDACTED] in Blythe, and has lived in that house for the past three years. He moved to Blythe from Mexicali sometime in either 1998 or 1999. He currently lives with his wife, [REDACTED] year old son, [REDACTED] year old daughter and [REDACTED] year old son. [REDACTED] also has a wife and child. Another son lives on the same lot, but in a different house.

[REDACTED] testified that he purchased the truck in his name, as his son [REDACTED] had poor credit. [REDACTED] previously had a Toyota pick up which he sold in order to purchase the truck.

Currently, Jose works for a company called Morgan, which is a company that assembles truck beds. His son used to work for Morgan also, but was recently laid-off.

The subject truck was purchased in Calixico as [REDACTED] was living there at the time. The truck was bought at the Calixico Ford dealership. [REDACTED] stated that he and his son did not know anyone who worked there. [REDACTED] could not recall his son adding anything special to the truck while he owned it. He says that his son was working at the time at a place called Kennedy's Tires in Brawley. He also says his son had no special need for a truck, but merely likes trucks.

[REDACTED] said that the monthly payment was \$475. He did not recall his son having to put any money down. He states that although the loan was in his name, he did not make any of the monthly payments, and his son made all of them. He states that his son would make the payments in person to the Calixico Ford Company. Apparently, his son went to Calixico fairly often. He states that it is an hour and three-quarter drive to get to Calixico.

[REDACTED] picked your company as the insurer. He states that he picked your company as he also had his Toyota and Astro van insured with your company. He states that he has not had any insurance claims. He believes that he may have his house insured with your company, but he wasn't sure. [REDACTED] stated that his truck was stolen about five years ago. However, that particular truck was not insured, so he did not make a claim.

Summary Of The Examination Under Oath Of

Page 2

stated that he spoke Spanish when he converged with your company's agent. He was positive that he told the agent that his son would be driving the vehicle. He does not believe that anyone else, other than he and his son, drove the truck. He states that drove the truck only rarely. His Toyota was usually driven by his daughter and the Astro van was usually driven by his wife. As works at the same place as his two sons, he usually went to work in s car. is the other son who lives on the property, but not in the same house.

stated that he does not know anyone who has had a car repossessed or whose car has caught on fire. stated that his son recently bought a used car to use as transportation.

Problems With The Truck

stated that the problems with the truck started either this year or last year. He recalled that the truck "jerked" while it was running. He recalled that his son first called the dealer in Calixico, who told him to take it to the dealer in Blythe. His son took the vehicle to the Blythe dealer, who thought the problem might be with the transmission. The oil was changed and the transmission was replaced, but the problem remained the same. The dealer then replaced the spark plugs, but the problem did not go away. Thereafter, the dealer replaced the electrical harness, but the problem did not stop. He believes that his son only had to pay for the oil change and not the rest. After the Blythe dealer was unable to solve the problem, his son called the dealer in Calixico, who told him to bring it there. stated that he questioned why his son did not have the vehicle towed, instead of deciding to drive it to Calixico. He heard from his son that while his son was going up a hill, he smelled something, but was unable to pull over right away. When he could pull over, the truck was on fire. He states that during the period of time when there were problems with the truck, his son did not drive it. He believes that his son had gone about 25 miles before the fire became apparent. He believes that the Calixico dealer was going to give his son a loaner car, but wasn't sure.

stated that he received a telephone call from his son sometime between 2:30 and 4 on March 29, 2001. He and his son had worked the 6:00 a.m. to 2:20 shift and his son left thereafter to go to Calixico. His son called from someone's cellphone and asked his father to call the police. The son also asked for a ride home. left to go pick up his son and arrived while it was still light. The fire department, police and highway patrol were already there when arrived. He states that the fire had already been put out.

Miscellaneous

did not know of the truck being involved in any accidents. He stated he was not aware of the truck ever being for sale. He thought it may have a value

Summary Of The Examination Under Oath Of

Page 3

of between \$16,000 and \$17,000 at the time of the loss. He had no explanation as to the fire expert's opinion as to how and where the fire started.

[REDACTED]

**Berger, Kahn,
Shafton, Moss, Figler,
Simon & Gladstone**

A Professional Law Corporation

RECEIVED

JUN 22 2001

June 26, 2001

3:30 PM

John Grimes
Farmers Insurance Exchange
72057 Highway 111
Rancho Mirage, CA 92270

Re: Insured: [REDACTED]
Policy No.: [REDACTED]
Claim No.: K0 103050
Loss Date: 3/29/2001
Our File No.: 33169

Dear Mr. Grimes:

As you know, our office took the examinations under oath of [REDACTED] on June 13, 2001. We have already provided you with our summaries of each of their testimonies.

We understand the reasons why your company sent this matter for an examination under oath. It certainly seems questionable that the truck would burn following the very frustrating experience by [REDACTED] to have the problems with the truck fixed. As you know, [REDACTED] states that he had problems with the truck for over a month and took the truck to the Blythe dealership many times. The dealership tried a number of ways to fix the truck but was unsuccessful. Originally, the Blythe dealership had not wanted to accept responsibility for the problem as [REDACTED] had purchased the truck in Calixico. At the end, they suggested that [REDACTED] may want to take the truck back to Calixico to see if the dealership there would have any success in fixing the problem.

Although questionable at the outset, now that further information has been obtained, we do not believe there is sufficient information to show that [REDACTED] Delapena was involved in setting the fire. [REDACTED] testified that although the experience was frustrating, he had a warranty and only had to pay a very small amount of money out of pocket for all of the repair efforts that were done on the truck by the Blythe dealership.

I telephoned the Calixico dealership and confirmed with Manuel Altamiran, the salesperson, that he gave the okay for [REDACTED] to bring the truck to Calixico for repairs after repair efforts failed in Blythe. He did not recall discussing whether the company

Orange County
2 Pk. Plaza, Suite 1100
Irvine, California 92614-4857
Tel: (949) 261-1994
Fax: (949) 261-1995

Los Angeles
Tel: (213) 611-8000
Tel: (213) 511-6178

San Francisco Bay Area
Tel: (415) 611-1770
Tel: (415) 611-1769

San Diego
Tel: (619) 211-0602
Tel: (619) 211-0512

Woodland Hills
Tel: (818) 511-1210
Tel: (818) 511-1224

Firm E-mail:
law@sherman.com

John Grimes
Farmers Insurance Exchange
Re: Insured: [REDACTED]
June 26, 2001
Page 2

would provide a loaner during repairs. [REDACTED] says he is not sure if this was discussed but that he expected a loaner would be provided as they did provide a loaner at the Blythe dealership. Further, while the amount of the truck payment seems high to me, [REDACTED] testified that he did not consider the \$487.00 per month payment to be high even though the payment was one-third of his earnings at the time the purchase was made. As you know, in many arson claims, the insured will be behind in his payments. Here, [REDACTED] had made the payments on the truck for almost three years and was current at the time of the fire. Further, he provided a bank statement showing that he had \$1,685.98 in April of this year.

We took the statements of all three witnesses back to back. It is important to note that neither of the witnesses had any opportunity at all to speak with the one before concerning the testimony. Each witness, for the most part, gave consistent testimony. We asked many detailed questions that it seems unlikely that they would have thought of even if they had all gotten together to rehearse their testimony. Although the father seemed somewhat irritated to be present, each of them was very cooperative and did not show any evidence of being nervous. Each of them confirmed the story with regard to using a passer-by's cell phone. [REDACTED] said that the connection was very bad and he kept having to move around to be able to speak with his father. Other details were similar with regard to the incline of the road where the fire occurred, the color of the smoke, whether or not the engine was on, where exactly they ran in, the explosions they heard and the length of time until they found help and until the fire department arrived.

There were some differences in their testimony. [REDACTED] testified that the air conditioning was off and that the windows were down at the time of the fire, whereas [REDACTED] testified that the air conditioner was on and the windows were up. Similarly, Francisco said that he saw flames when he got out of the truck, whereas Jorge testified that he only saw smoke. We do not know if this discrepancy may be due to their different vantage points on different sides of the truck.

Following the examinations under oath, I asked a fire expert to review Mr. Barnett's findings as the testimony of the insureds did not seem consistent with the type of testimony I have seen in the hundreds of arson cases I have had in the past 16 years of taking examinations under oath. I was expecting merely some information over the telephone but instead, the expert, Michael Whedon, sent a five page report where he compares some of Mr. Barnett findings with portions of NFPA 921. NFPA 921 was developed as a national standard for fire investigators. The first edition was issued in 1992. Any fire expert used by your company should be familiar with NFPA 921 as he or she will be cross-examined regarding these standards in any claim that later goes to suit. We enclose a copy of Mr. Whedon's report with this letter. We also enclose a copy of documents Francisco Delapena provided at his examination under oath.

John Grimes
Farmers Insurance Exchange
Re: Insured: Delapena, Jose
June 26, 2001
Page 3

In closing, it is our opinion that there remain questions as to whether or not the fire to the Ford truck was intentionally set. Based on the questionable aspects of the physical remains and based on the testimony of the insureds, we recommend that your company adjust and pay this claim.

Should you have any questions or comments regarding this matter, please do not hesitate to give me a call.

Very truly yours,



Melody S. Mosley

MSM:cd
Enclosures

F/DELAPENA/33169/CARR 6/26/01

PHOTO MOUNTING SHEET

INSURED: [REDACTED]

CLAIMANT: _____

POLICY NUMBER: [REDACTED]

DATE TAKEN: _____

SALN NUMBER: KG 103650

ADJUSTER: _____

DATE OF LOSS: 3-29-01

VEHICLE: _____



PICTURE NUMBER _____

DESCRIPTION: _____

Rt Fnt



PICTURE NUMBER _____

DESCRIPTION: _____

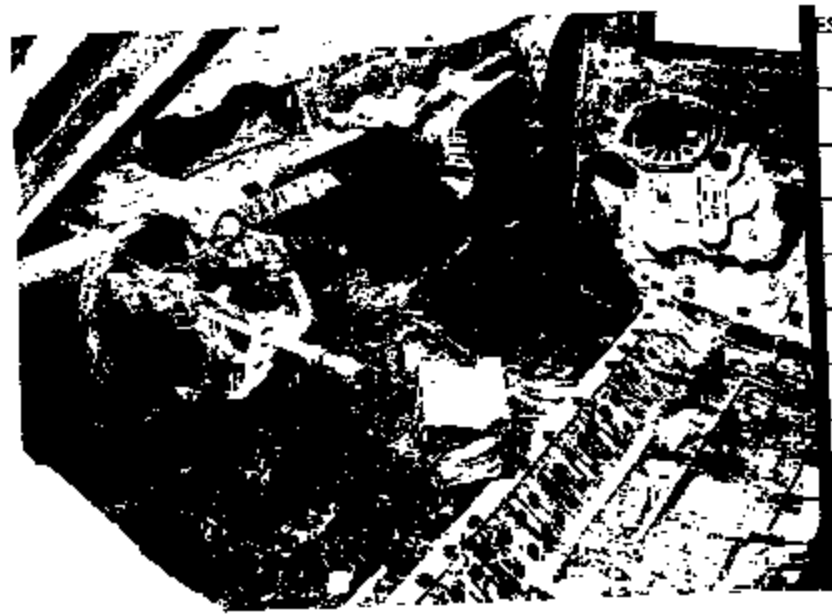
PHOTO MOUNTING SHEET

INSURED: [REDACTED]
POLICY NUMBER: [REDACTED]
SALN NUMBER: K6 103650
DATE OF LOSS: 3-29-01

CLAIMANT: _____
DATE TAKEN: _____
ADJUSTER: _____
VEHICLE: _____
PICTURE NUMBER _____



DESCRIPTION: _____



PICTURE NUMBER _____
DESCRIPTION: _____

PHOTO MOUNTING SHEET

INSURED: _____ CLAIMANT: _____

POLICY NUMBER: _____ DATE TAKEN: _____

SALN NUMBER: K6 103650 ADJUSTER: _____

DATE OF LOSS: 3-29-01 VEHICLE: _____

PICTURE NUMBER: _____

DESCRIPTION: _____



PICTURE NUMBER: _____

DESCRIPTION: _____





FARMERS

Memo

RECEIVED

MAY 21 2001

BCO K6

Date: May 16, 2001
To: John Grinos, CR
Department: K6
From: Tom Niblack
Department: SCSC Special Investigations

Subject: INITIAL & FINAL REPORT

Re: Insured : [REDACTED]
Date of Loss : March 29, 2001
SALN : K6-103650
Investigator : Tom Niblack

SYNOPSIS

This matter was referred to our unit for investigation on April 25, 2001. This report concerns a total loss fire to the insured's 1998 Ford F150 pickup truck on a deserted highway. The insured had been having problems with the truck jerking while he was driving it. He had originally purchased the truck from the Ford dealer in Calexico, but since he lived in Blythe, he had been taking the vehicle to Blythe Ford to have it worked on. Blythe Ford replaced the transmission, but he still continued to have problems with it jerking. While driving from Blythe to Calexico to have the dealer there look at it, it caught on fire and was totally destroyed.

CONCLUSIONS

Based on my investigation, I could not find any evidence that the insured had anything to do with the causation of the fire to the truck. I verified with the Ford dealer in Blythe that he had the transmission replaced with factory re-manufactured transmission. I also obtained the recorded statement of the witness, [REDACTED] who was with the insured at the time. His statement corresponded with everything that the insured told me. The insured has no prior history of claims and there were negative findings in his background check.

Confidential. For company use only.

INDICATORS

Indicators present in this file that led to referral to our Investigations Unit were:

- 1) The cause and origin expert could not determine the cause of the fire, but did say that it was too hot to be caused by electrical.
- 2) The insured had been having mechanical problems with the truck, which had not been satisfactorily resolved.
- 3) The fire occurred on an isolated highway with no eyewitnesses other than his friend, who was with him.

INVESTIGATIVE ASSIGNMENT

We were asked to complete the following investigation:

- 1) Obtain the statement of the witness.
- 2) Speak with the Ford dealer who did the repairs.

INVESTIGATION DETAILS**BACKGROUND INVESTIGATION**

Due to cost constraints, I only ran the insured through ISO to determine if he had any prior claims. There was no record of the insured ever filing any other claims. The adjuster had previously checked for any problems with the identification of the vehicle and did not find any problems.

PHONE CONTACT

[REDACTED] - The adjuster had recently taken a recorded statement, so I did not want to jeopardize our obtaining an EUO by taking another statement that soon after the fire. However, I did speak with him on the phone in some detail on both May 7th and May 16th. He stated that he purchased the vehicle from the Ford dealer in Calexico. He could not remember the name of the dealer, but said that the salesman was Manuel Altamirano and his phone # is 760-357-3141. He lives in Blythe and when he had problems with the truck, he was told by Manny to take it there. He said that the truck would jerk, especially when he would go up hills. He took the truck to Blythe Ford Center and they thought that it was the transmission. They replaced it with a Ford re-manufactured transmission. He was still having the same problem, so they replace the spark plug wires. The problem persisted and he became frustrated and called Manny who told him to bring it to Calexico. Blythe Ford had given him a loaner while the transmission was being replaced. He went with his friend [REDACTED] to Calexico on the date of loss. They had already gone up a small hill and were going up a steeper hill when the truck began jerking fairly hard. He pulled over to the side of the road and pulled the hood release. When he did this, smoke began pouring out of the sides of the slightly raised hood. He opened the hood and there was a considerable amount of fire. They backed away from the truck and it burned. Several people stopped by and one of them had a cell phone and called 911. He said that the fire department from Palo Verde came out, but the truck was burned up except for the tires, which they put out. They made out a small report,

Confidential. For company use only.

**PROOF OF LOSS
AUTOMOBILE PHYSICAL DAMAGE CLAIM**

RECEIVED

SECTION I

NAME OF INSURANCE COMPANY Farmers Insurance Group		APR 2 1991 SUBSCRIBED 16 103030
[REDACTED]		[REDACTED]
[REDACTED] Blythe CA [REDACTED]		[REDACTED]
NAME OF VEHICLE	MAKE	MODEL
[REDACTED]		[REDACTED]
ADDRESS (No. Street/City/State)		
[REDACTED] Blythe CA [REDACTED]		[REDACTED]

SECTION II - Description of Vehicle

YEAR 1988	MAKE Ford	MODEL F-150	COLOR Red, dark torcedor	VIN 1FTZX0722W
REGISTERED OWNER [REDACTED]				
RESIDENCE [REDACTED] Blythe CA [REDACTED]				
LEGAL OWNER Same				PHONE
ADDRESS (No. Street/City/State)				
TITLE HOLDER Ford motor credit / Robinson Ford Sales Inc.				PHONE 457 (760) 344
ADDRESS (No. Street/City/State) 1777 north imperial ave colton CA 92231				
OTHER FINANCING				PHONE
ADDRESS (No. Street/City/State)				

DATE PURCHASED 7-25-90	PURCHASE PRICE \$22,675	LOAN BALANCE \$13,642.16	MONTHLY PAYMENTS \$487.22	PAYMENTS CURRENT <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
HAS VEHICLE EVER BEEN A TOTAL LOSS AND/OR TITLED AS A SALVAGE VEHICLE <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		IF "YES" NAME AND ADDRESS OF PERSON(S) WHO REPAIR TOTAL LOSS VEHICLE		
LIST POOR TIMING, IF MORE, SO STATE None				

COLOR EXTERIOR Red dark torcedor	COLOR INTERIOR beige	WHEELS 5.7320	TRANSMISSION <input checked="" type="checkbox"/> AUTOMATIC <input type="checkbox"/> MANUAL
ENGINE DISC 4.2 V6	COMBUSTION	FUEL TYPE Cigarette	

LIST SPECIAL EQUIPMENT INCLUDING MAKE, MODEL, VALUE, WHEN/WHERE PURCHASED:
Alarm model KARR Value 150⁰⁰ 12-28-00

ACTUAL CASH VALUE OF VEHICLE AT TIME OF LOSS \$16,560	AMOUNT OF ENTIRE LOSS \$16,560
HAS CAR BEEN OFFERED FOR SALE? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	

2-881 12-88 071

SECTION III - Facts of Occurrence

DATE 3-29-01	TIME 4:15	AL AL	CVY Palo Verde	COUNTY Imperial	STATE CA.
LOCATION Highway 78 Palms Verde going to Calexico on the HHS.					
REPORT TO POLICE? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	DATE REPORTED (mm/dd/yyyy) 3-29-01	REPORT OR CASE NO. none	WHAT DEPARTMENT/AGENCY		
ANY LIENS OR VALUABLES IN VEHICLE (SECURE)? no					

SECTION IV

WHERE WERE VALUABLES LOCATED

SECTION V

CIRCUMSTANCES SURROUNDING THE LOSS
Auto was jerking and local Ford co. said to take it to Calexico for repairs. Calexico dealer said should repair here is Blithe - But Blithe the Ford wouldn't open, took it to Calexico Damages Happened en route.

OTHER INSURANCE NAME OF COMPANY	AMOUNT OF INSURANCE \$
NAME OF COMPANY	AMOUNT OF INSURANCE \$

The vehicle described herein has been manufactured or modified to comply with all required U.S.A. D.O.T. and E.P.A. safety and emission standards. Furthermore, the described vehicle met all U.S.A. safety and emission requirements immediately prior to this loss. The above mentioned loss did not originate or continue by any act, design, procurement, or willful neglect on the part of the insured, or on the part of any person having any interest, direct or indirect, in the insured property or in the policy of insurance; nothing has been done by or with the insured's knowledge or consent to violate the conditions of the policy or render it void; no property saved has in any manner been concealed, and no attempt to deceive the insurance company as to the extent of the loss has in any manner been made.

Any other information that may be required will be furnished when called for, and made a part hereof.

Any other information that may be required will be furnished when called for, and made a part hereof.



Dated 4-5-01 432001

STATE OF CALIFORNIA
County of RIVERSIDE
On 4-5-01 before me, GLADYS FARRAGE, a Notary Public
in and for said State, personally appeared _____
personally known to me or proved to me on the basis of satisfactory evidence to be the person(s) whose name(s)
is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in the
authorized capacity(ies), and that he/she/they signed the instrument as the person(s), or the entity upon
behalf of which the person(s) acted, executed the instrument.

WITNESS my hand and official seal.

Signature *[Signature]*
MY COMMISSION EXPIRES APRIL 8, 2002



For your protection please be advised of the following: any person who knowingly presents a false or fraudulent claim for payment of a loss, or knowingly presents false or misleading information to an insurance company for the purpose of obtaining or attempting to obtain an insurance company, or provides false information concerning a material fact on an application for insurance, or helps any other person commit such acts, may be guilty of fraud, and may be subject to substantial civil and criminal penalties pursuant to the laws of the state in which these acts occur.

DISBURSMENT: Any person who knowingly, and with intent to injure, defraud or deceive any insured, makes any claim for the proceeds of an insurance policy containing any false, incomplete or misleading information is guilty of a felony.

PERJURY: Any person who knowingly and with intent to defraud any insurance company or other person files an application for insurance or statement of claim containing any material false information or conceals for the purpose of obtaining information, concealing any fact material thereto causing a fraudulent insurance act, which is a crime and subjects each person to criminal and civil penalties.



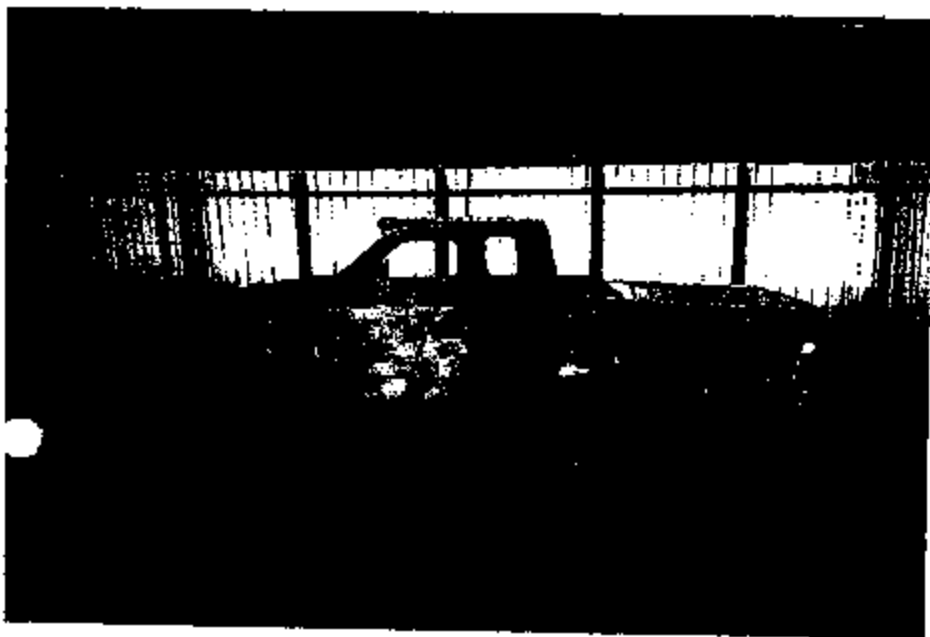
EA05-605-LC1-2821



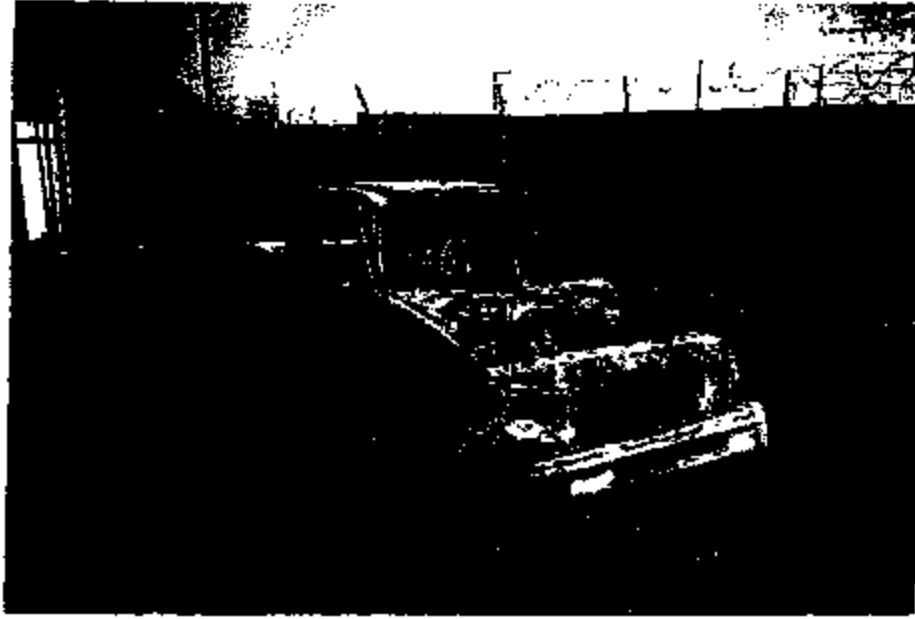
E005-005-LC1-2822



ERG5-885-LC1-2023



ER08-0186-L01-0924



8905-083-LC1-2928



FARMERS

Moreno Valley Subrogation COE
23180 Hemlock Ave
PO Box 699
Moreno Valley, CA 92556
Telephone: (909)243-6029
FAX: (909)243-7293

August 02, 2001

Ford Motor Company Consumer Affairs Division

16800 Executive Plaza Dr.
MD #3 NB-B
Dearbor, MI 48126-4207

RE: Our Insured: [REDACTED]
Policy Number: [REDACTED]
Loss Date: 3/29/2001
Claim Number: K6-103650
Amount Owed: \$21,001.00

Dear :

Our records reflect that on 7/18/2001 we advised you of our subrogation rights and asked you to furnish us with your insurance carrier information or to advise how you plan to repay this claim. To date, you have not responded.

Farmers Insurance has a right to recover damages paid, and if any injury claims are paid under the uninsured motorist portion of our policy, that amount will also be added to our claim.

If you have no insurance we will accept monthly payments to repay this claim. Please contact me to arrange for a monthly payment amount.

Failure to respond to this letter within 10 days will result in this file being turned over to an attorney to handle the matter with you, which could result in the loss of your driver's license and a garnishment of your wages, therefore, please contact me immediately.

Sincerely
FARMERS INSURANCE EXCHANGE

Joe Gonzalez
Subrogation Claims Representative



COPY

IN THE CIRCUIT COURT OF TIPPAAH COUNTY, MISSISSIPPI

[REDACTED]

PLAINTIFF

VS.

NO. 06-143

ASTRO FORD OF MISSISSIPPI, INC.,
FORD MOTOR COMPANY, FORD
MOTOR CREDIT COMPANY, NEW HAMPSHIRE INDEMNITY-
A DIVISION OF AMERICAN INTERNATIONAL GROUP, INC.,
CARPENTER & ASSOCIATES INSURANCE AGENCY
AND SHANE CARPENTER D/B/A CARPENTER
& ASSOCIATES INSURANCE AGENCY

DEFENDANTS

COMPLAINT

Comes now the Plaintiff, [REDACTED] by and through counsel, and files this his Complaint against the Defendants, Astro Ford Lincoln Mercury, Ford Motor Company, Ford Motor Credit Company, New Hampshire Indemnity - a division of American International Group, Inc., Carpenter & Associates Insurance Agency, and Shane Carpenter d/b/a Carpenter & Associates, and in support thereof would show unto the Court the following:

1. That the Plaintiff is an adult resident citizen of Tippah County, Mississippi.
2. That the Defendant, Astro Ford of Mississippi, Inc., is a Mississippi corporation whose registered agent for process is David L. Cobb, One Hancock Plaza #1709, P.O. Drawer 4108, Gulfport, Mississippi 39502.
3. That the Defendant, Ford Motor Company, is a Delaware corporation, doing business in the state of Mississippi, and whose agent for process is CT Corporation System, 631 Lakeland East Drive, Flowood, Mississippi 39208.

4. That the Defendant, Ford Motor Credit Company, is a Delaware corporation, doing business in the state of Mississippi, and whose agent for process is CF Corporation System, 631 Lakeland East Drive, Flowood, Mississippi 39208.

5. That the Defendant, New Hampshire Indemnity - a division of American International Group, Inc., is an insurance company doing business in the state of Mississippi, and whose agents for process are the Mississippi Insurance Commissioner and Larry Tolbert, 1080 River Oaks Drive, River Oaks Office Plaza, Suite 200, Flowood, Mississippi 39208.

6. That the Defendant, Carpenter & Associates Insurance Agency, is an insurance company doing business in Corinth, Alcorn County, Mississippi, who may be served with process upon their manager, at 1796 Highway 72 East, Corinth, Mississippi 38834.

7. That the Defendant, Shane Carpenter, is an agent for Carpenter & Associates Insurance Agency, who may be served with process at 1796 Highway 72 East, Corinth, Mississippi 38834, or at his residence located at 3507 Brigade Cove, Corinth, Mississippi 38834.

8. The Plaintiff purchased a Ford F150 truck on or about November 18, 1998, from the Defendant, Astro Ford, financing the vehicle through the Defendant, Ford Motor Credit. The Plaintiff purchased insurance covering any loss to the vehicle from Shane Carpenter, an agent of Carpenter & Associates. The policy of insurance was written through New Hampshire Indemnity, a division of American International Group, Inc.

9. On or about July 7, 1999, the Plaintiff's wife, [REDACTED], was driving the truck on Highway 2 in Tippah County, Mississippi, when the truck quit working. Mrs.

Wilbanks telephoned the Plaintiff, who came to pick up his wife, with the intention of retrieving the truck at a later time. While the truck was left unattended, the vehicle caught fire, severely burning the inside. The truck was eventually towed to Astro Ford. Thereafter, the vehicle was repossessed and sold by Ford Motor Credit. Ford Motor Credit is now seeking recovery of the deficient balance after the sale of the vehicle.

BREACH OF WARRANTY

10. The Defendant, Astro Ford, sold the Plaintiff a vehicle produced by the Defendant, Ford Motor Company, which was defective. The vehicle suffered from numerous manufacturing and/or design defects which severely impacted the ordinary fitness of the vehicle, ultimately leading to the fire on July 7, 1999. The Defendant, Ford Motor Credit, financed the vehicle, and is attempting to collect on the original promissory note.

BAD FAITH

11. The Defendant, Carpenter & Associates, sold the Plaintiff a policy of insurance which covered the vehicle for damage. The policy was written through New Hampshire Indemnity, a division of American International Group, Inc. The Plaintiff filed a claim for damages shortly after the fire on July 7, 1999. As of the date of the filing of this Complaint, the Defendant insurance company has not paid for the damages nor attempted to satisfy the Plaintiff in any manner. In fact, the Plaintiff was forced to file this Complaint to recover his losses.

12. The Plaintiff has lost the payments made on the vehicle, his means of transportation, loss of use of his vehicle, loss of the insurance coverage for which he had

paid, and has been forced to endure considerable inconvenience.

WHEREFORE PREMISES CONSIDERED, Plaintiff demands judgment of and from the Defendants in the following manner:

That the Plaintiff recover the amount of equity he held in the vehicle from the date the vehicle caught fire;

That the Plaintiff recover \$200.00 for loss of use of the vehicle;

That the Plaintiff recover \$3,000.00 for the inconvenience he has suffered;

That the Plaintiff recover attorney's fees and court costs as outlined by the Magnuson-Moss Warranty Act;

That the Plaintiff recover for the insurance premiums he expended for the coverage on said vehicle;

That the Plaintiff recover punitive damages in an amount which will punish the Defendant insurance company for dealing in bad faith with the Plaintiff;

And for such other relief which a jury of Plaintiff's peers may find him deserving.

Respectfully submitted,

GREG E. BEARD, P.A.

Greg E. Beard

Greg E. Beard
MS Bar No. 9481
Attorney for Plaintiff

FILED THIS 2 DAY OF
August 2002
JAMES E. DEES, CIRCUIT CLERK
BY Don Bennett DC

GREG E. BEARD, P.A.
ATTORNEY AT LAW
109 NORTH COLLEGE STREET
POST OFFICE BOX 285
BOONEVILLE, MS 38829
TELEPHONE: 662/720-8340
FAX: 662/720-8342

==>

FCSD REGION: _____ MARKET: _____ ISSUE STATUS: _____
 P&A CODE: _____
 VIN: 2FTZF1726W0 _____ CASE NUMBER: _____
 SALES REGION: _____ SALES ZONE: _____ ISSUE TYPE: _____

A	LAST HND/	Customer Phone Number/	Reason/	Stat/
C	FLA LAO	Prnt Customer Name	Year Model	Type
	08/04/99	[REDACTED]	(B) MISC INQUIRY - GENERAL/OTHER 1998 F-SERIES	C 01
	06/04/99 00874	[REDACTED]	(B) DEALERSHIP - UNABLE TO DUPLICA 1998 F-SERIES	C 02

F1=Help F2=AddAction F5=CustomerList F6=DealerInfo
 F7=Prev F8=Next F10=IssueDetail F11=Menu F12=Return
 NO MORE RECORDS AVAILABLE OGDB191

==>

VIN: 2FTZF1726WC [REDACTED] Year: 1998 Model: F-SERIES
Owner Status: ORIGINAL WSD: 11/18/98 Mileage: 1
Name: [REDACTED] Hm Ph: [REDACTED]
Trmt: Case: 385421559 Day Ph: [REDACTED]
Symptom:
Reason: MISC INQUIRY - GENERAL/OTHER
Dealer:
Issue Type: 01 INQUIRY CAN Court: Legal Issue Type:
Issue Status: C CLOSED CAN Award: MORSI Contact: N

A/C DATE Origin Description

08/04/99 CACM02 FOUND IN OUTSIDE SOURCE

F1=Help F2=AddAction F4=ActionDetail F6=DealerInfo F12=Return
F7=Prev F8=Next F9=ViewMORSII F11=Menu OGDB191
NO MORE RECORDS AVAILABLE

SPCHADMA

Action Detail

08/22/00 15:22:22

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VIN: 2FTZF1726WC [REDACTED] Year: 1998 Model: F-SERIES
Owner Status: ORIGINAL WSD: 11/18/99
Name: [REDACTED] Hm Ph [REDACTED]
Trmt: [REDACTED] Case: 385421559 Day Ph [REDACTED]
Symptom Desc:
Reason Desc: MISC INQUIRY - GENERAL/OTHER
Dealer:
Issue Type: 01 INQUIRY Issue Status: C CLOSED
Comm Type: PH PHONE Odometer Reading: 1 MI
Analyst: ASIBS ALICIA SIBBLIES Document Number:
Action Date: 08/04/99 Action Data: Action Time: 13:06:26 EST
Origin Desc: MANUAL - PHONE CSR
Action Desc: FOUND IN OUTSIDE SOURCE
Comments: CUSTOMER SAYS: WOULD LIKE TO KNOW WHAT TYPE OF RECALLS WERE
ON THE FORD PICK PER CUSTOMER, DEALER SAYS: NONE CAC ADVISED:
RECALLS ARE ON VEH SPECS -CAC CAN'T TELL CUST ALL THE RECALLS
THERE WERE ON F-SERIES IN GENERAL -HAS TO HAVE A VIN TO GO BY

F1=Help F2=AddAction F4=PrevAction F5=NextAction F6=ActionData
F9=PrevComments F10=NextComments F11=Menu F12=Return F13=ESP
NO MORE COMMENTS AVAILABLE

OGDB191

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VIN: 2FTZF1726W [REDACTED] Year: 1998 Model: F-SERIES
 Owner Status: ORIGINAL REG: 11/18/98 Mileage: 13300
 Name: [REDACTED] Hm Ph: [REDACTED]
 Trmt: Case: 385421559 Day Ph: [REDACTED]
 Symptom: EXHAUST SYSTEM VISUAL SMOKE
 Reason: DEALERSHIP - UNABLE TO DUPLICATE CONCERN
 Dealer: ASTRO FORD LINCOLN MERCURY
 Issue Type: 02 INFORMATION CAN Court: Legal Issue Type:
 Issue Status: C CLOSED CAN Award: MORBII Contact: N

A/C DATE Origin Description

 06/04/99 CAC NO ACTION REQUIRED; INFORMATION ONLY
 06/04/99 CAC138 DEALER CAN'T RESOLVE CONCERN IF THEY CAN'T DUPLICATE THE C

F1=Help F2=AddAction F4=ActionDetail F6=DealerInfo
 F7=Prev F8=Next F9=ViewMORBII F11=Menu F12=Return
 NO MORE RECORDS AVAILABLE OGDB191

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VIN: 2FTZF1726W Year: 1998 Model: F-SERIES
 Owner Status: ORIGINAL WSD: 11/18/98
 Name: Hm Ph:
 Trmt: Case: 385421559 Day Ph:
 Symptom Desc: EXHAUST SYSTEM VISUAL SMOKE
 Reason Desc: DEALERSHIP - UNABLE TO DUPLICATE CONCERN
 Dealer: ASTRO FORD LINCOLN MERCURY
 Issue Type: 02 INFORMATION Issue Status: C CLOSED
 Comm Type: PH PHONE Odometer Reading: 13300 MI
 Analyst: KNATION1 KEVIN NATION Document Number:
 Action Date: 06/04/99 Action Data: Action Time: 10:38:44 EST
 Origin Desc: GENERAL CAC
 Action Desc: NO ACTION REQUIRED; INFORMATION ONLY
 Comments: CUSTOMER SAYS: - VEHICLE WOULDN'T ENGAGE 3RD AND 4TH GEAR
 PROPERLY - TOOK VEHICLE TO DLRSH FOR REPAIR - DLRSH SAID
 THEY FIXED IT - NOW CUST STATES THAT HE IS HAVING AN EXH
 AUST LEAK - CUST FEELS THAT THIS IS A RESULT OF THE PREVIO
 US REPAIR PER CUSTOMER, DEALER SAYS: NO PROBLEM FOUND
 CAC ADVISED: - INFORM WHY THE DEALERSHIP CAN NOT RESOLVE TH

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

OGDB191

=>

VIN: 2PTZF1726W [REDACTED] Year: 1998 Model: F-SERIES
Owner Status: ORIGINAL WSD: 11/18/98
Name: [REDACTED] Hm Ph: [REDACTED]
Trmt: [REDACTED] Case: 385421559 Day Ph: [REDACTED]
Symptom Desc: EXHAUST SYSTEM VISUAL SMOKE
Reason Desc: DEALERSHIP - UNABLE TO DUPLICATE CONCERN
Dealer: ASTRO FORD LINCOLN MERCURY
Issue Type: 02 INFORMATION Issue Status: C CLOSED
Comm Type: PH PHONE Odometer Reading: 13300 MI
Analyst: KNATION1 KEVIN NATION Document Number:
Action Date: 06/04/99 Action Data: Action Time: 10:38:44 EST
Origin Desc: GENERAL CAC
Action Desc: NO ACTION REQUIRED; INFORMATION ONLY
Comments: CAC ADVISED: - INFORM WHY THE DEALERSHIP CAN NOT RESOLVE TH
E CONCERN IF THEY CANNOT DUPLICATE THE CONCERN AT THE TIME
OF SERVICE - ADVISE CUSTOMER TO CONTACT DEALERSHIP AS SOON
AS (INTERMITTENT) CONCERN IS NOTICED INFERENCE CASE ID: 446
2

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

OGD8191

SFCHADMA

Action Detail

08/22/00 15:22:48

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VIN: 2FTZF1726WC Year: 1998 Model: F-SERIES
Owner Status: ORIGINAL WSD: 11/18/98
Name: Hm Ph:
Trmt: Case: 385421559 Day Ph:
Symptom Desc: EXHAUST SYSTEM VISUAL SMOKE
Reason Desc: DEALERSHIP - UNABLE TO DUPLICATE CONCERN
Dealer: ASTRO FORD LINCOLN MERCURY
Issue Type: 02 INFORMATION Issue Status: C CLOSED
Comm Type: PH PHONE Odometer Reading: 13300 MI
Analyst: KNATION1 KEVIN NATION Document Number:
Action Date: 06/04/99 Action Data: Action Time: 10:38:44 EST
Origin Desc: US CONCERN CASE BASE
Action Desc: DEALER CAN'T RESOLVE CONCERN IF THEY CAN'T DUPLICATE THE C
Comments: CAC ADVISED: - INFORM WHY THE DEALERSHIP CAN NOT RESOLVE TH
E CONCERN IF THEY CANNOT DUPLICATE THE CONCERN AT THE TIME
OF SERVICE - ADVISE CUSTOMER TO CONTACT DEALERSHIP AS SOON
AS (INTERMITTENT) CONCERN IS NOTICED INFERENCE CASE ID: 446
2

F1=Help F2=AddAction F4=PrevAction F5=NextAction F6=ActionData
F9=PrevComments F10=NextComments F11=Menu F12=Return F13=ESP
NO MORE COMMENTS AVAILABLE

OGDB191

SPCHADMA

Action Detail

08/22/00 15:22:46

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VIN: 2FTZF172GWC Year: 1998 Model: F-SERIES
 Owner Status: ORIGINAL WSD: 11/18/98
 Name: Hm Ph:
 Trmt: Case: 385421559 Day Ph:
 Symptom Desc: EXHAUST SYSTEM VISUAL SMOKE
 Reason Desc: DEALERSHIP - UNABLE TO DUPLICATE CONCERN
 Dealer: ASTRO FORD LINCOLN MERCURY
 Issue Type: 02 INFORMATION Issue Status: C CLOSED
 Comm Type: PH PHONE Odometer Reading: 13300 MI
 Analyst: KNATION1 KEVIN NATION Document Number:
 Action Date: 06/04/99 Action Data: Action Time: 10:38:44 EST
 Origin Desc: US CONCERN CASE BASE
 Action Desc: DEALER CAN'T RESOLVE CONCERN IF THEY CAN'T DUPLICATE THE C
 Comments: CUSTOMER SAYS: - VEHICLE WOULDN'T ENGAGE 3RD AND 4TH GEAR
 PROPERLY - TOOK VEHICLE TO DLRSHP FOR REPAIR - DLRSHP SAID
 THEY FIXED IT - NOW CUST STATES THAT HE IS HAVING AN EXH
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 CAC ADVISED: - INFORM WHY THE DEALERSHIP CAN NOT RESOLVE TH

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

MORE COMMENTS AVAILABLE

OGDB191



INTER-COMPANY SUBROGATION NOTIFICATION

FARM BUREAU MUTUAL INSURANCE CO., INC.
 KFB INSURANCE COMPANY, INC

WESTERN AGRICULTURAL INSURANCE

DATE: 7-16-01

ADJUSTER: Tom Terwort

TO: Ford Motor Company
 Consumer Affairs Dept
 16800 Executive Plaza Drive
 MD #3 EE-B
 Dearborn, MI 48126-4207

FARM BUREAU CLAIMS
 P O BOX 986
 PRATT, KS 67124
 316-672-5156
 FAX 316-672-3345

YOUR INSURED -
 YOUR FILE # -
 POLICY # -

OUR INSURED - [REDACTED]
 POLICY # - [REDACTED]
 CLAIM # - [REDACTED]
 D/L - 12-20-00

LOCATION OF ACCIDENT: [REDACTED] Coldwater, KS [REDACTED]

Our investigation of this accident indicates that liability rests with your insured.

This is our: Interim Notice Final Notice

Please accept this letter as a notice of our rights under:

- Personal Injury Protection (PIP)
- Vehicle Damage
- Should we be called upon to make payment, we will be looking to you for subrogation.
- We hereby make demand upon you for moneys due to us as shown below.

VEHICLE DAMAGE

NET AMOUNT PAID BY COMPANY \$ 15,222.54
 INURED VEHICLE DEDUCTIBLE \$ None
 TOTAL AMOUNT OF DAMAGES \$ 15,222.54
 LESS SALVAGE PROCEEDS \$ _____
 RENTAL PAID BY COMPANY \$ _____
 TOTAL VEHICLE DAMAGE \$ 15,222.54

PERSONAL INJURY PROTECTION

BAKED _____
 MEDICAL _____
 WAGE _____
 SUBSID _____
 FUNERAL _____
 REHAB _____
 SURVIVOR LOSS:
 Monthly earnings _____
 Daily substitution _____

PIP TOTAL _____

ENCLOSURES:

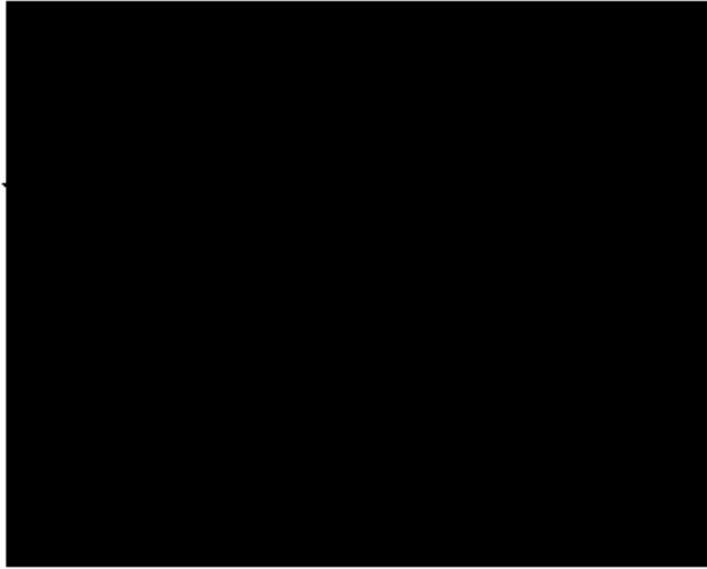
- POLICE REPORT
- REPAIR ORDER
- PHOTOGRAPHS
- MEDICAL BILLS
- ESTIMATES
- FINAL BILL
- SALVAGE SHEET
- Copy of draft

REMARKS: This claim is due to a fire on the 1997 F150 PK which was parked in the garage & the resulting damage to it & another vehicle & the garage & contents.

2001 JUL 24 12:12 PM
 CLAIMS SUPPORT

RECEIVED
 CLAIMS UNIT
 JUL 25 2001
 OFFICE OF THE
 PUBLIC COUNSEL

\$15,222.54 - Coldwater, KS
\$49,343
garage damages + contents + other vehicle
12/20/00 - 97 F-150





July 3, 2001

Ford Motor Company
Office of General Counsel
Park Lane Towers West, Suite 400
Three Park Lane Blvd.
Dearborn, MI 48126



Re: Claim # [REDACTED]
Insured [REDACTED]
Vehicle - 1997 Ford F 150 Pick Up
Serial # - 1FTDX0763V [REDACTED]

Gentlemen:

This is to place you on notice of our subrogation rights under a Texas Homeowners Form B policy and a Texas Personal Auto policy.

Our insured, [REDACTED] who owned the above described vehicle sustained a vehicle fire on May 24, 2001 in which the vehicle and his home burned.

The vehicle is located at a safe facility out of the weather and we have had our engineer inspect the vehicle and we feel that the fire was a result of one of the numerous recall notices that is out on this vehicle.

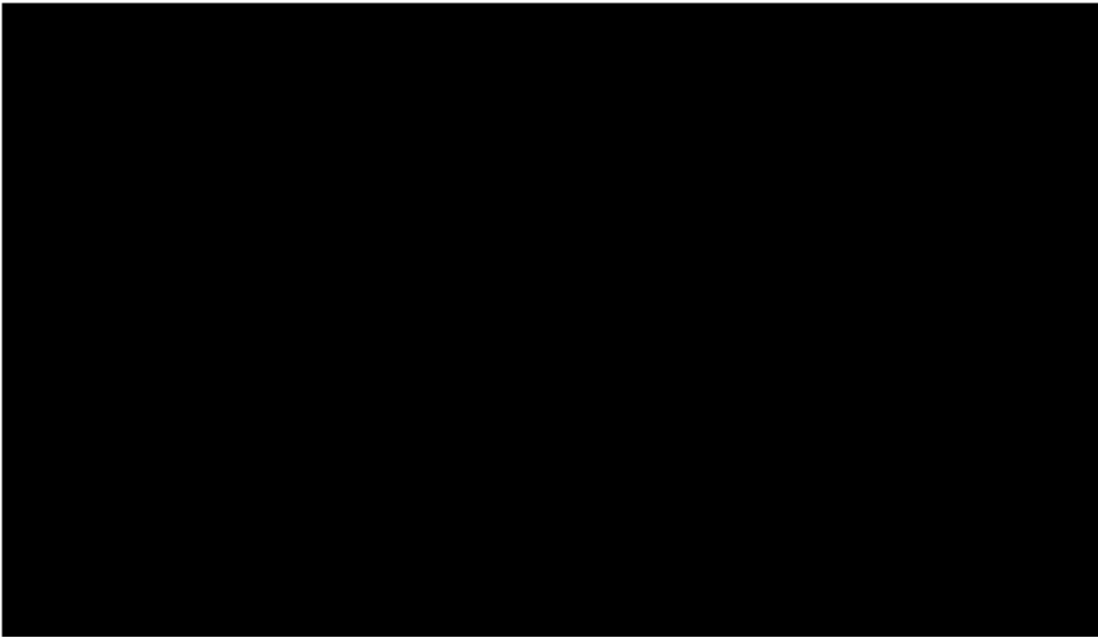
Please contact our office in order to inspect the vehicle.

Sincerely,

Frances Niemeyer
Claims Supervisor

FN/s

- 197 F-150
- VIN
- 5/24/01

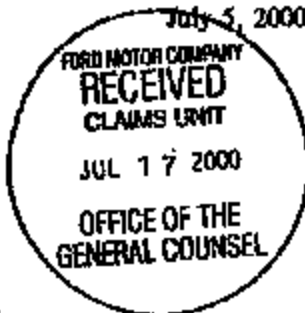


JOHN J. GARMAN

ATTORNEY AT LAW

F. O. Box 934 • Brentwood, Tennessee 37024-0934 • phone: 615 / 781-9777 • fax: 615 / 385-9123

Shawn L. Norton
Claims Analyst
Ford Motor Company
Parklane Towers West
Suite 400
Three Parklane Boulevard
Dearborn, Michigan 48126-2568



New

RE: State Farm Claim No.: [REDACTED]
SF Insured: [REDACTED]
Date of Loss: March 31, 2000
Place of Loss: Summertown, TN
1997 Ford F150 Pickup
VIN # 1FTDF18W9VN [REDACTED]

Dear Mr. Norton:

State Farm has turned this matter over to me. Enclosed is a copy of the Fire Department's report and photos. Please contact my office so we may discuss this matter.

Sincerely yours,

JOHN J. GARMAN

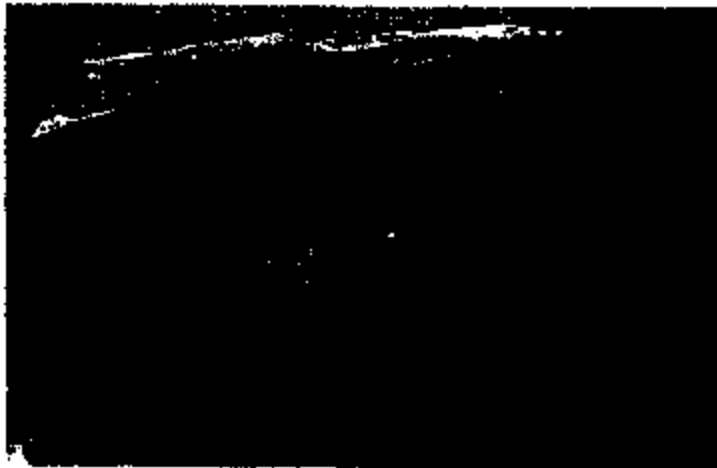
dah

Enclosures

pc: State Farm, Rep 2



Photo for: 42-1240-242



EP003-005-L01-2843

SUMMERTOWN FIRE DEPARTMENT

MISSION REPORT

INCIDENT # _____ DAY OF WEEK Friday - 31-00
 DATE OUT 3/31/2000 DATE IN 3/31/2000
 TIME OUT 10:30 AM TIME IN _____

TYPE OF MISSION Truck Fire TOTAL MILES _____

WHAT CAUSED FIRE N/A

NAME AND ADDRESS OF VICTIM _____
 NAME OF ROAD Leasburn Rd.

INSURANCE NAME AND ADDRESS Tennessee Insurance (State Farm)

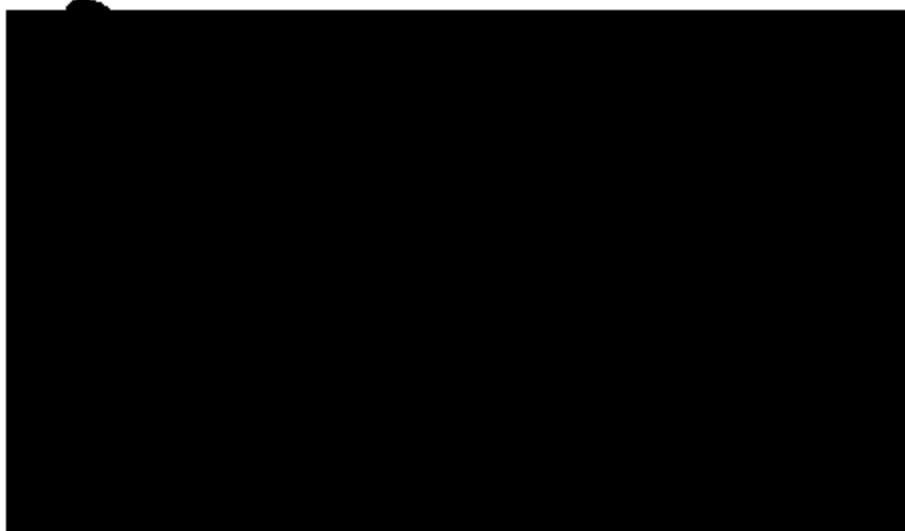
AMOUNT OF INSURANCE _____ ESTIMATED DOLLAR LOSS Total Loss

NUMBER OF VEHICLES RESPONDING (SUMMERTOWN) Summerton - 12
 (OTHER) Elkhart - 12

AUTO FIRE
 TAG # 734-VZP MAKE Ford F-150 MODEL 1997
 VIN NUMBER 1FTD18W9VN _____

MEN RESPONDING TO CALL
Michael Malaga E.F. 12: Ed B...
Kyle Swanson

PERSON MAKING REPORT Michael Malaga



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

CIVIL DIVISION

Plaintiff,

NO.

vs.

FORD MOTOR COMPANY,

Defendant.

COMPLAINT

AND NOW comes the Plaintiff, [REDACTED] by and through his attorneys, DBELLA & 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, 48126-2588.
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 \$24,020.50.

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,
ROBERT D. PANNELL
W.VA ID NO. 8104

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

 CIVIL DIVISION


Plaintiff, NO.

vs.

FORD MOTOR COMPANY,

Defendant.

VERIFICATION

I,  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.

BY: 

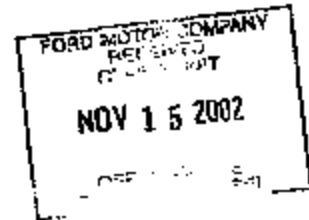
DATE: 7/19.003



ERIE INSURANCE GROUP

Branch Office - 1000 Murry Ridge Drive - P.O. Box 605 - Murrysville, PA 15668-0605 - (724) 326-7700
Toll Free 1-800-553-3367 - Fax (724) 326-7715 - <http://www.erie-insurance.com>

November 4, 2002



Mr. Shawn Norton
Claims Analysis
Ford Motor Company
Parklane Towers West, Suite 300
Three Parklane Boulevard
Dearborn, MI 48126-2568

Re [redacted] Claim

Date of Loss: 5/12/02

Roger

Dear Mr. Norton:

I am the subrogation adjuster handling the above-mentioned fire claim. As you are aware, our insured's 2002 Ford F150 four-wheel drive truck caught on fire. The vehicle was burned beyond repair. This vehicle carried a VIN number of 1FTRX18W22[redacted]

The total amount of our subrogation claim against the Ford Motor Company is \$23,920.50, with salvage pending. Our investigation indicates the following:

Our insured purchased this vehicle new, in approximately December 2001. It was purchased from Shaffer Ford in Cumberland, Maryland. On May 12, 2002, our insured was driving this vehicle on Route 50 in Bayard, West Virginia, when the vehicle caught fire. The vehicle had approximately 3,000 miles on it at the time. The insured called the fire department and the fire was extinguished.

This vehicle is located at Insurance Recovery Center, 1670 Old Road, 220 South, Duncessville, Pennsylvania 16635, should you wish to inspect it.

Please contact me at your earliest convenience to discuss this loss.

Sincerely,

Marlene Camara
Marlene Camara
Subrogation Specialist
Murrysville Branch Claims
1-800-553-3367

*Bayard, WV
3000 (M)*

MC:tam

56237_1

The [redacted] is Above All In SERVICE - Since 1925



WILLIAMS & MAHONEY, LLC

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David M. Williams
David P. Mahoney

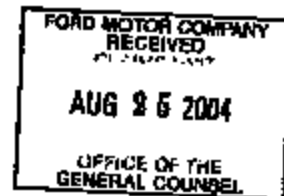
Steven R. Krucynski
Lari L. Jones
Phil A. Taylor

August 19, 2004

OF Counsel
Ray Mark Deag *
*Admitted to Practice Only

Quincy Office
15 Foster Street
Quincy, MA 02169

Ford Motor Company
Parklane Towers West
Suite 300
Three Parklane Boulevard
Dearborn, MI 48126-2568



RE: Allstate Insurance Subrogation Claim
Claim No: [REDACTED]
Insured: [REDACTED]
Date of Loss: 01/18/2004

Dear Sir or Madam:

Please be advised, this office has been retained by Allstate Insurance ("Allstate") to represent them relative to the above-referenced matter. Please direct all future correspondence regarding this case to my attention.

This letter will serve as our initial notice that Allstate intends to pursue a subrogation case against your company. Specifically, Allstate has information that a 1997 Ford F150 caught fire, ultimately causing significant damage to the vehicle and home of Allstate's insured. The vehicle was parked in the insured's driveway.

We are in the process of gathering additional documentation to support this claim. Once we have gathered all of the documentation we will forward it to you for your review. If, in the interim, you require any specific documentation, please advise me of such.

If you have any questions, please do not hesitate to contact me. I can be reached at (978) 232-9500, ext. 26.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas R. Vigne".

Thomas R. Vigne