



All Action Details for Issue

Print

VIN: 1EM7L3Z75M18 [REDACTED] Year: 1998 Model: EXPLORER Case: 1502481383
 Name: [REDACTED] Owner Status: Subsequent WSD: 1998-04-13
 Symptom Desc: GENERAL INQUIRIES REQUEST/NON-VEHICLE RELATED Primary Phone: [REDACTED]
 Reason Desc: REDIRECTED CALL - LEGAL SECTION Secondary Phone:
 Issue Type: 02 INFORMATION Issue Status: CLOSED

Action: CONSUMER AFFAIRS, ADDRESS AVAILABLE IN PHRASEOLOGY
 Dealer: Origin Desc: US CONCERN CASE BASE
 Odometer: 51000 MI Comm Type: PHONE
 Analyst Name: MELISSA TAVARES Analyst: MTAVARES
 Action Date: 05/19/2003 Action Time: 13.57.07.380 Action Data: No

Caller Information if Different From Vehicle Owner:

First Name	Middle Initial	Last Name	Day Phone	Relationship
ERIN		DENNISON		OTHER

Comments: CUSTOMER SAYS -THE VEH CAUGHT ON FIRE -SAYS THAT THE DAY BEFORE HE HAD DROVE THE VEH -THE FIRE HAPPENED ON MAY 09 /03 -THE CRUISE CONTROL SWICH IS FAULTY THERE WAS AN INVESTIGATION OF THE TRAVELORS FRIST FLORIDIAN INSURANCE COMPANY - ERIN DENNISON 1800(842)5609 EXT4404 -THE VEH IS AT THE FORD DLR -ERIN DENNISON WHO IS THE INSURANCE COMPANY IS CALLING IN WITH THE CUST ON THE LINE WOULD LIKE THE CSR TO FILE CLAIM - PER CUSTOMER, DEALER SAYS: CAC ADVISED: - PLEASE SEND A DEMAND LETTER TO FORD MOTOR COMPANY, CONSUMER AFFAIRS P.O. BOX 6248, MD-3NE-B DEARBORN, MICHIGAN 48128 INFERENCE CASE ID: 5339



First Floridian
A Travelers Company

Erin Denison
Claim Representative
Claim Department
First Floridian
Auto and Home Insurance Company
P.O. Box 30180
Tampa, FL 33630-3180
813.890.4404 wrk
813.890.4430 fax
edenison@travelers.com

May 19, 2003

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

RECEIVED JUN 6 2003

RE: Policy Holder : [REDACTED]
Claim Number : [REDACTED]
Date of Loss : 05/09/03
Vehicle : 1998 Ford Explorer
VIN : 1FMZU32X5WU [REDACTED]

3 MAY 27 11:49
CONSUMER AFFAIRS
SECTION

Dear Consumer Affairs:

Please accept this as a demand to file a claim with Ford Motor Company for the damages resulting from the above-referenced incident.

On May 9, 2003, our insured's vehicle (1998 Ford Explorer) caught on fire. Upon inspection by our fire investigator, the cause of the fire appears to be the cruise control switch in the vehicle. Our insured also reports having problems with the cruise control prior to the loss.

Based on the results of our initial investigation, we wish to put Ford Motor Company on notice that we will be pursuing subrogation for the damages to our insured's vehicle. The initial estimate of damages totaled \$2,929.83, with a possibility of additional hidden damage.

Upon a call to Ford Motor Company customer service today, we were advised by [REDACTED] that the only way to set up a subrogation claim was to mail a demand letter to Consumer Affairs. We requested a more expedient way to file this claim (i.e. via fax or phone) but were told this was the only way to do so.

Please contact the undersigned at 1-800-842-5609 x4404 upon receipt of this letter.

Thank you for your attention to this matter.

Sincerely,

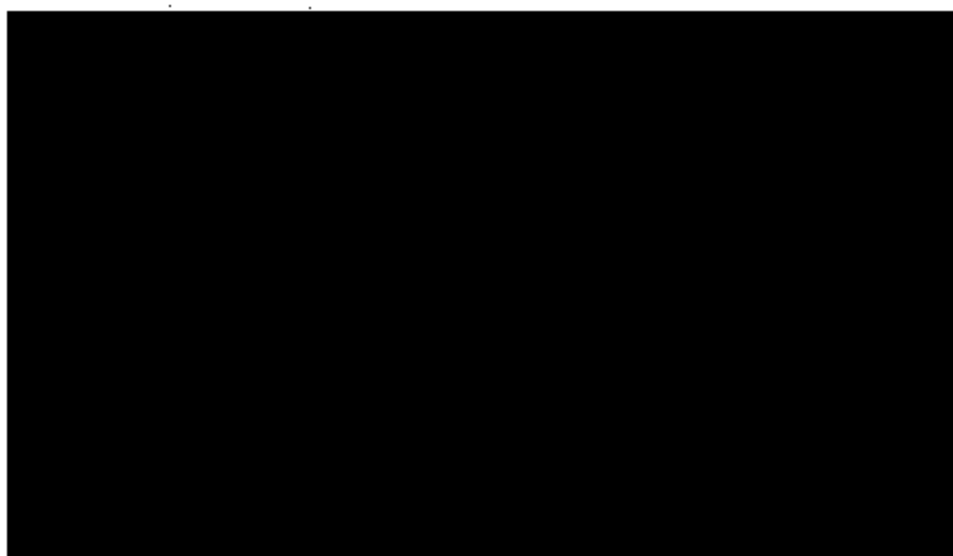
Erin Denison
Claim Representative

Cc: Eugene Staschic

FORD MOTOR COMPANY
RECEIVED
JUN - 3 2003
COUNSEL

First Floridian - We Put Florida First.
www.firstfloridian.com

ERG5-085-LC1-4499



**M. A. STRINGER & ASSOCIATES, INC.**

(504) 454-0466

2805 Division Street, Suite 101
Metairie, Louisiana 70002
504-454-0992
504-454-0438 (Fax)

1210 Park Drive, Suite 100
Mandeville, Louisiana 70471
985-674-7677
(Fax) 985-674-7673

November 12, 2004

Mr. Kirk Alonzo, Claim Representative
State Farm Insurance Company
5700 Bullard Avenue
New Orleans, Louisiana 70128

RE: Fire Analysis Report
Insured: [REDACTED]
Address of Loss: Superdome Parking Lot
New Orleans, Louisiana [REDACTED]
Date of Loss: 10-06-04
Claim Number: [REDACTED]
MASA Contract Number: 10045036M

RECEIVED
NOV 12 2004
NEW ORLEANS EAST

Dear Mr. Alonzo:

In response to the October 7, 2004 request of Mr. Kirk Alonzo, Claim Representative, State Farm Insurance Company, New Orleans, Louisiana, M. A. Stringer and Associates, Inc. (MASA) has examined and analyzed the above captioned vehicle fire loss. The vehicle was carefully examined on October 12, 2004 at Insurers Auto Auction, St. Rose, Louisiana by Mervin A. Stringer, MASA Chief Fire Specialist, at which time photographs were taken, some of which are included at the end of this report with the remainder being retained in the MASA file. Also at the time of the site visit, the remains of the Speed Control Deactivation Switch (SCDS) was located and retained. The switch remains are being maintained in the MASA North Shore evidence storage facility and will not be disposed of until we have been authorized to do so in writing.

It was reported to MASA that this vehicle, a 2000 Ford Explorer, had been parked for approximately five (5) hours when it caught fire. The vehicle was parked in the Louisiana Superdome parking area, by the insured, who parked it at this location while at work. When the

insured returned to the vehicle after work, it was learned that the vehicle, and the vehicles on either side, had burned. Additionally the Superdome management had the vehicles removed and the site cleaned up. It was lastly reported that the insured had experienced no problems with the vehicle and that regular maintenance was performed.

Figures 1 and 2 are views of the vehicle at the storage facility in St. Rose, Louisiana. As can be seen, the vehicle had been covered. This cover was removed and Figures 3 through 21 are views showing the exterior of the vehicle. As can be seen, the damage gradients and burn patterns clearly show that this fire originated in the vehicle's engine compartment, which is shown in Figures 13, 14 and 15. Note that this vehicle had an aluminum hood, which melted during the course of the fire. Figures 16 and 17 show the remains of the Vehicle Identification Number (VIN). Only the suffix portion of this VIN [REDACTED] was readable. This matched the reported VIN suffix for this vehicle. Figures 18 through 25 show the interior of the vehicle. As can be seen, there is still some upholstery materials that were not consumed during the course of the fire. This fire clearly did not originate in the cab of the vehicle. Figures 26 through 29 are views showing the examination of the transmission fluid dipstick and engine oil dipstick. This examination revealed that these fluid levels were adequate for the normal operation of the vehicle.

MASA is aware that the SCDS in this model vehicle has experienced problems that has caused numerous fires. This switch is supplied with twelve (12) volts at all times, as long as there is a battery in the vehicle. A brake fluid leak into the electrical section, which is energized at all times, corrodes the contacts and a resistive short to ground can develop. This can result in this switch's plastic connector body igniting, and subsequently an engine compartment fire. Figure 30 is a view showing the driver's side of the engine compartment. The arrow points to the brake booster tank. The brake master cylinder was mounted on the front of this tank and because it is constructed of aluminum, it was melted during the course of the fire. The SCDS is mounted on the front of this master cylinder. A search of the suspension system below this area located the remains of the SCDS, as shown in Figures 31 and 32. The switch remains were removed and photographed, as shown in Figures 33, 34 and 35. The switch was placed into a plastic bag and retained, as shown in Figure 36. The area where the SCDS electrical connector is located was searched, as shown in Figures 37 and 38, in an effort to locate the connector remains. However, the connector remains were not found and were presumed to have fallen off, during the course of the fire, and disposed of when the site was cleaned up.

As can be seen in a study of the figures, the damage gradients and burn patterns clearly show that this fire originated in the vehicle's engine compartment. It was reported that there were vehicles parked on either side of this vehicle and that those other vehicles were also damaged by the fire. This vehicle was reported to have been properly maintained and had no known problems.

RECEIVED
NOV 15 2004
NEW ORLEANS EAST

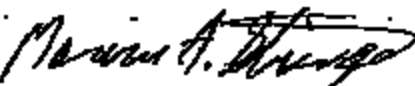
Although the electrical connector for the SCDS, which can show definitive evidence of an internal failure in the SCDS, could not be located, a failure in this vehicle's SCDS is the most probable cause for this fire.

Based on the results of the investigation conducted by MASA, as set forth in this report, it is the opinion of M. A. Stringer and Associates, Inc. that the October 6, 2004 fire in the Deborah Adams 2000 Ford Explorer originated in the engine compartment and was most probably the result of a failure in the vehicle's Speed Control Deactivation Switch (SCDS).

MASA appreciates the opportunity to be of service to you and State Farm Insurance Company in this matter. If we can be of additional assistance in this or other matters, please do not hesitate to contact us.

Sincerely,

M. A. Stringer and Associates, Inc.



Mervin A. Stringer
Chief Fire Specialist

MAS/ts

Original and One Copy

Mr. Kirk Alonzo, Claim Representative
State Farm Insurance Company
5700 Bullard Avenue
New Orleans, Louisiana 70128

Report Copy

MASA File

RECEIVED
NOV 15 2004
NEW ORLEANS EAST

JAN. 6. 2005 2:16PM

WACHOVIA SECURITIES

NO. 2265 P. 6/25

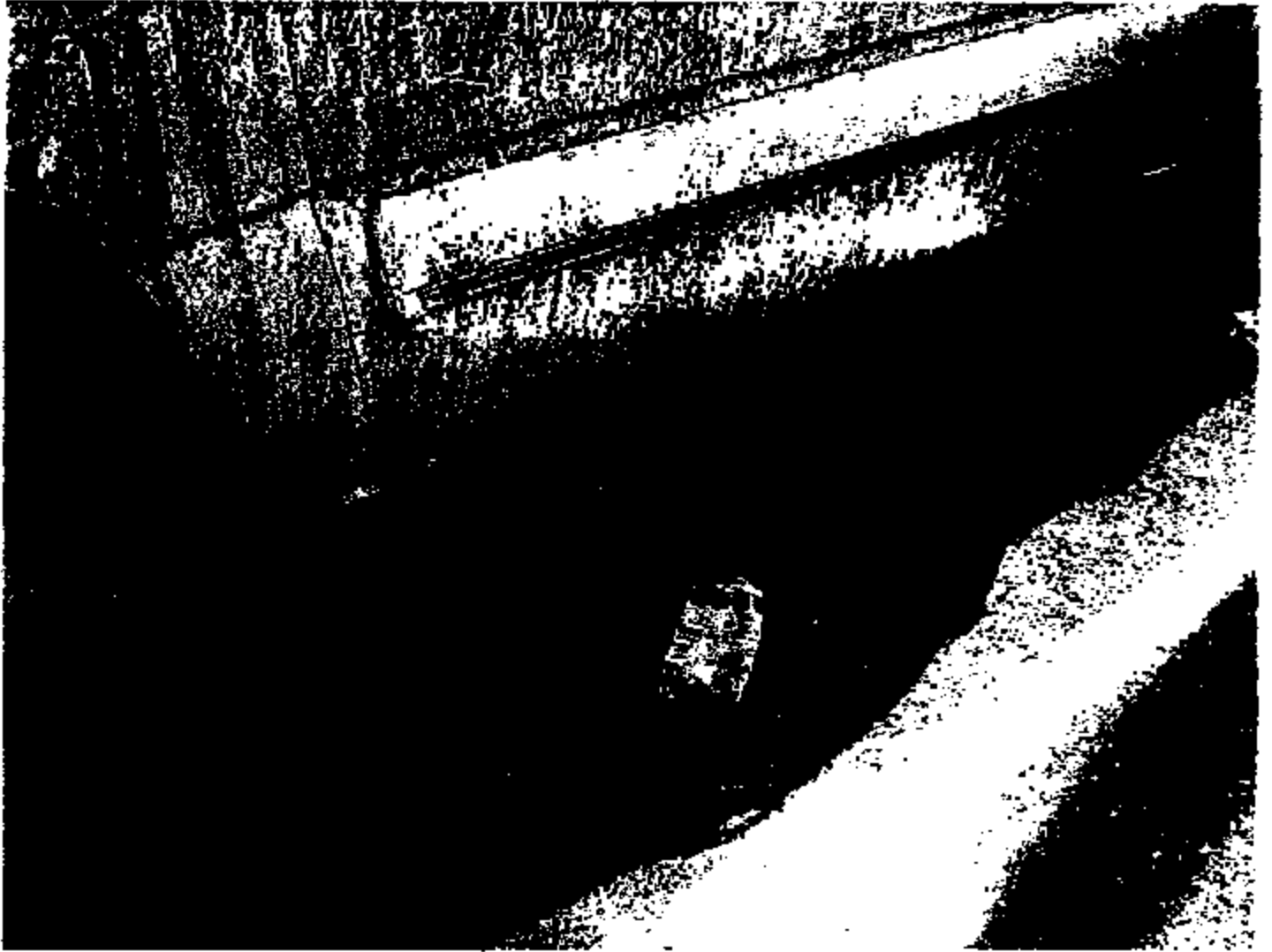
RECEIVED

INCIDENT REPORT		PAGE 1 OF 3		SS ITEM NO. J-07-07		NOPD ITEM NO. N/A	
SIGNAL 52 P		INCIDENT VEHICLE FIRE		EVENT NONE		OCT 25 2004	
DATE/TIME OCCURRED OCTOBER 6, 2004; 1502HRS.				DATE/TIME REPORTED OCTOBER 6, 2004; 1502HRS.			
LOCATION (INTERIOR)							
LEVEL N/A		QUADRANT N/A		SECTION N/A			
LOCATION (EXTERIOR)							
GARAGE SOUTHEAST		LEVEL/SECTION N/A		INTERSECTION STALLS B-31, B-32, B-33			
NAME (P.M.)		RACE	SEX	D.O.B.	AGE	OCCUPATION	
██████████		██████████	██████████	██████████	██████████	FINANCIAL CONTROL	
HOME ADDRESS		ZIP	HM PHONE	SOCIAL SECURITY NO.			
██████████ CONVINGTON, LA.		██████████	██████████	██████████			
BUSINESS ADDRESS		ZIP	BS. PHONE	DR. LIC # OR ST.			
██████████		UNK.	██████████	UNK.			
SOBRIETY	INJURY	TYPE INJURY	TREATED	MED/TRAN	TRANSPORTED TO	DOCTOR/EMT/NURSE	
1	7	N/A	N/A	N/A	N/A	N/A	
NAME (P.M.)		RACE	SEX	D.O.B.	AGE	OCCUPATION	
██████████		██████████	██████████	██████████	██████████	FINANCIAL ADVISOR	
HOME ADDRESS		ZIP	HM PHONE	SOCIAL SECURITY NO.			
██████████		██████████	██████████	UNK.			
BUSINESS ADDRESS		ZIP	BS. PHONE	DR. LIC # OR ST.			
UNK.		UNK.	██████████	UNK.			
SOBRIETY	INJURY	TYPE INJURY	TREATED	MED/TRAN	TRANSPORTED TO	DOCTOR/EMT/NURSE	
1	7	NONE	N/A	N/A	N/A	N/A	
NAME (P.M.)		RACE	SEX	D.O.B.	AGE	OCCUPATION	
██████████		██████████	██████████	██████████	██████████	ENGINEER	
HOME ADDRESS		ZIP	HM PHONE	SOCIAL SECURITY NO.			
██████████		██████████	██████████	UNK.			
BUSINESS ADDRESS		ZIP	BS. PHONE	DR. LIC # OR STATE			
██████████		██████████	██████████	UNK.			
SOBRIETY	INJURY	TYPE INJURY	TREATED	MED/TRAN	TRANSPORTED TO	DOCTOR/EMT/NURSE	
1	7	N/A	N/A	N/A	N/A	N/A	
NOPD REQUESTED (DATE/TIME)				NOPD ARRIVED (DATE/TIME)			
N/A				N/A			
OFFICER(S)				UNIT			
N/A				N/A			
EMS REQUESTED (DATE/TIME)				EMS ARRIVED (DATE/TIME)			
N/A				N/A			
TECHNICIAN(S)				UNIT			
N/A				N/A			
1. SOBER		1. FATAL		1. REFUSED		1. POLICE/EMS	
2. HAD BEEN DRINKING		2. CRITICAL		2. TREATED/		2. OTHER EMS	
3. INTOXICATED		3. SERIOUS		3. RELEASED		3. POLICE	
4. DRUGS		4. SEVERE		3. HOSPITALIZED		4. CIVILIAN	
5. UNKNOWN		5. MODERATE				5. SELF	
		6. MINOR					
		7. NO INJURY					
REPORTING OFFICER BADGE #		WATCH COMMANDER		DIRECTOR'S OFFICE			
LT KIRK A WOODS		<i>[Signature]</i>		<i>[Signature]</i>			

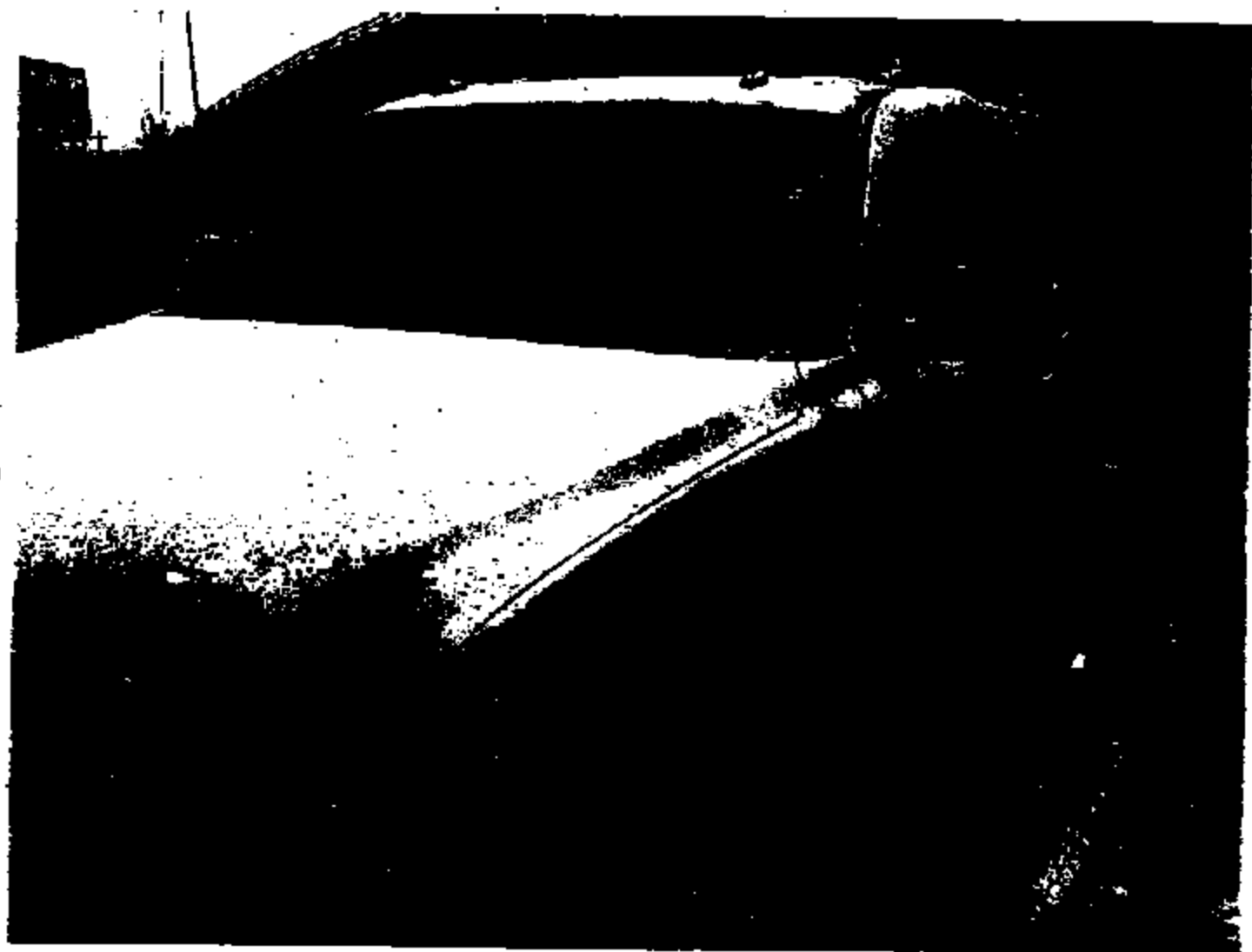
RECEIVED

CONTINUATION	PAGE 2 OF 3	SS ITEM # 1-07-04	NOPD NOV 25 2004 OCT 25 2004
SIGNAL 52 F	INCIDENT VEHICLE FIRE	EVENT NONE	NEW ORLEANS EAST
<p>ON WEDNESDAY OCTOBER 6, 2004, AT APPROXIMATELY 1502HRS. JIM BAKER RADIO'D SECURITY CONTROL ABOUT A FIRE IN THE SOUTHEAST GARAGE. AT 1504HRS LT WOODS LOCATED THE FIRE AT 1/8 SOUTHEAST GARAGE, AND NOTIFIED SECURITY CONTROL TO CALL NEW ORLEANS FIRE DEPARTMENT (N.O.P.D.) FOR A VEHICLE FIRE. LT. WOODS AND ASSISTANT SECURITY MANAGER RAYMOND GRIFFIN SET UP A PERIMETER ON THE EXTERIOR OF EAST PARKING TO PROHIBIT PATRONS FROM HAVING ACCESS TO EAST PARKING. N.O.P.D. ARRIVED AT 1508HRS. AND BEGAN TO EXTINGUISH THE FIRE, N.O.P.D. HAD THE FIRE UNDER CONTROL AT 1530HRS. N.O.P.D. EXTINGUISHED THE FIRE AT 1558HRS.</p> <p>UPON ARRIVAL LT. WOODS OBSERVED THE HOOD AREA OF A GOLD FORD EXPEDITION ENGLUPED IN FLAMES. AFTER THE FIRE WAS EXTINGUISHED LT-WOODS RETURNED TO 1/8 SOUTHEAST AND NOTICED THE FIRE CAUSED SEVERE DAMAGE TO THE FOLLOWING VEHICLES:</p> <p>VEHICLE # 1 2000 GOLD FORD EXPEDITION LA. LIC PLATE [REDACTED] OWNED BY STEPHEN [REDACTED]. STATEFARM INSURANCE COMPANY POLICY NUMBER UNKNOWN. VEHICLE NUMBER # 1 WAS THE FIRST VEHICLE OBSERVED (IN STALL B-32) BURNING BY LT. WOODS. VEHICLE NUMBER # 1 SUFFERED TOTAL DAMAGE TO THE VEHICLE DUE TO FIRE AND WATER. [REDACTED] STATED HE PARKED HIS VEHICLE IN SOUTHEAST AT 0900HRS., AND DIDNT NOTICE ANYTHING UNUSUAL ABOUT THE VEHICLE. DIDNT SMELL ANY BURNING ODORS (SEE PHOTO J-07-04R).</p> <p>VEHICLE # 2 A GREEN SATURN, LA. LIC. PLATE [REDACTED] VIN. # 1G82G127 [REDACTED] 02, MASSACHUSETTS BAY INSURANCE CO. POLICY # AV [REDACTED] 6/28/04 THRU 6/28/05. OWNER [REDACTED]</p> <p>VEHICLE # 3 WAS PARKED AT 1/8 SOUTHEAST STALL B-31 NEXT TO VEHICLE # 1, THE FIRE FROM VEHICLE # 1 AND WATER CAUSED TOTAL DAMAGE TO THE VEHICLE (SEE PHOTO J-07-04J, J-07-04W)</p> <p>VEHICLE # 3 A 2000 WHITE CHEVROLET SUBURBAN LA. PLATE [REDACTED] VIN. # 3GNBC [REDACTED]. LIBERTY MUTUAL AUTO INSURANCE COMPANY, POLICY [REDACTED] 7/16/04 THRU 7/15/05</p> <p>OWNER HERMAN R. CALLENDER PARKED AT 1/8 SOUTHEAST STALL B-31 NEXT TO VEHICLE # 1</p> <p>THE FIRE FROM VEHICLE # 1 AND WATER CAUSED TOTAL DAMAGE TO THE VEHICLE # 3</p>			
REPORTING OFFICER BADGE #	WATCH COMMANDER	DIRECTORS OFFICE	DATE
LT. KIRK A. WOODS	<i>[Signature]</i>		





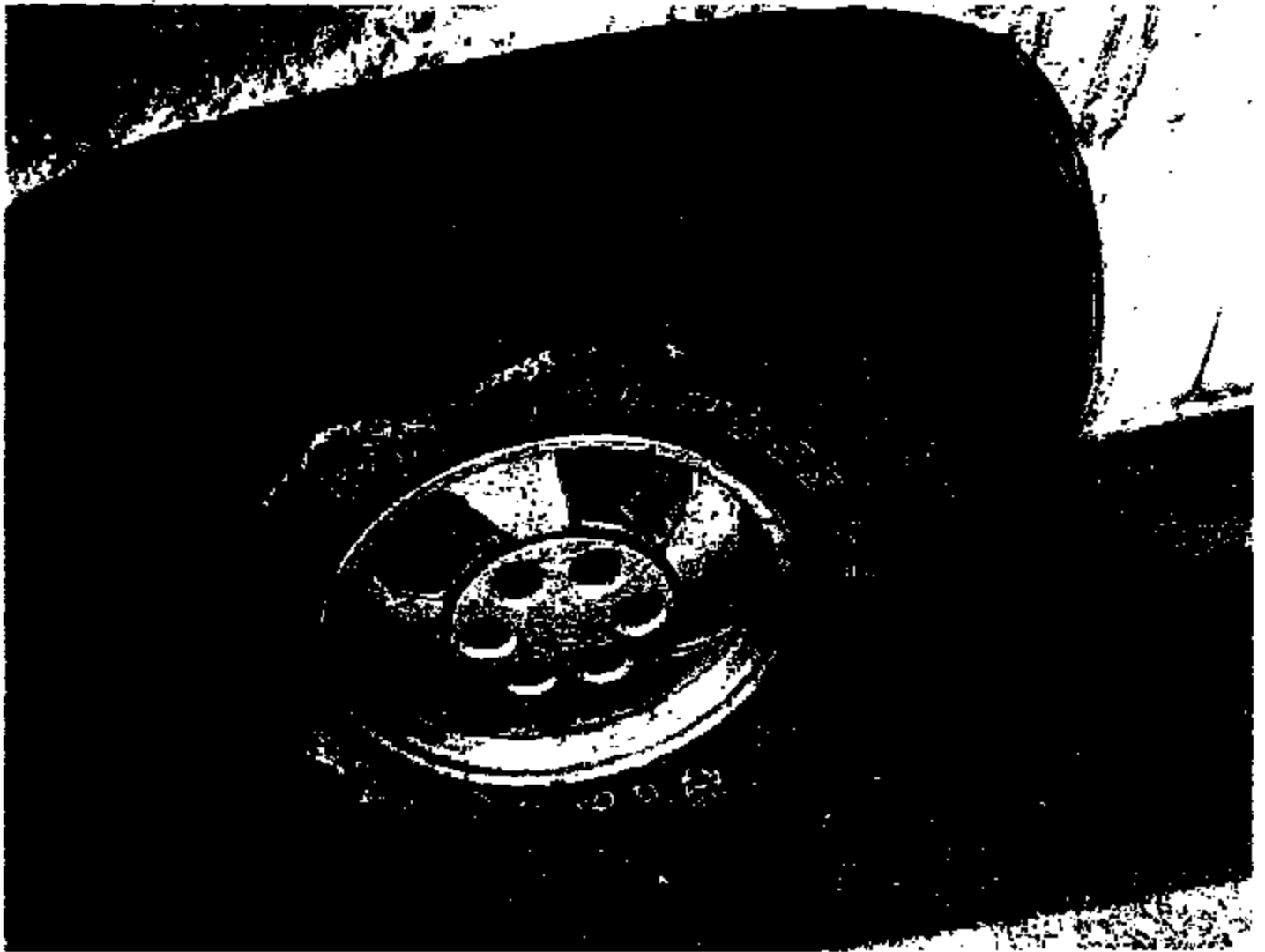
ER05-005-LC1-4307



ER05-005-LC1-4508



EA05-005-LC1-4300



EGG-888-LC1-4518



EM05-005-LC1-4511



**GROTEFELD
& DENENBERG, LLC**

Explosion Farms, MI
Chicago, IL
Houston, TX
San Francisco, CA

The Clark Adams Building
105 West Adams Street
Suite 2300
Chicago, Illinois 60601
Telephone: (312) 591-8200
Facsimile: (312) 601-3402

Brad M. Gordon
Admitted in IL, IN and NY
(312) 601-3377
bmj@gd-llc.com

October 19, 2004

Via Facsimile (312) 396-2107
Ford Motor Company
Office of the General Counsel
Parklans Towers West, Suite 400
Three Parkland Boulevard
Dearborn, MI 48126-2568

*Called
10/20/04*

Re: Allstate Insured: [REDACTED]
Claim No.: [REDACTED]
Date of Loss: 10/13/04
Our File No.: 9.008001

Dear Sir or Madam:

Please be advised that this firm represents Allstate Insurance Company with regards to a fire that occurred at the home its insured [REDACTED] on October 13, 2004, at the [REDACTED] home located at [REDACTED] Lafayette, Louisiana. Based upon the results of our investigation and eyewitness statements, the fire originated with a 2000 Ford Explorer. The resulting fire damaged other materials in the garage, communicated to the carpet and then to the rest of Benwell home.

The purpose of this letter is to place Ford on notice of this loss and that Allstate will subrogate for all damage which it will pay to its insured pursuant to its policy in the event that further investigation discloses liability of Ford.

Our client wishes to extend an opportunity to Ford to examine the loss site prior to the commencement of repair and renovation. Because of Allstate's obligation to its insured, it is imperative that Ford advise the undersigned before the close of business on Friday, October 22, 2004 of its intent to send a representative to the site to view it in its post fire condition. If we do not receive a response from you by that time, we will assume that Ford and/or its representatives do not wish to view the fire scene and they will waive their opportunity to do so.

Thank you for your time and understanding in this matter. We look forward to your prompt response to points raised above.

Very truly yours,

GROTEFELD & DENENBERG, L.L.C.


Brad M. Gordon

BMG/mlm
cc: Jim Price

** TOTAL PAGE 02 **

0005-005-LC1-4512



RECEIVED JAN 26 2005



GROUP

NCO Financial Systems, Inc.

Subrogation Services

500 North Franklin Turnpike

Ramsey, New Jersey 07446

PHONE: 866-836-9845

FAX: 201-618-9640

Certified Mail: 7004 1160 0005 7127

Handwritten circle around the word "GROUP"

cl 12/04

January 18, 2005

Ford Motor Company
Parklane Towers West
Suite 300
Three Parklane Boulevard
Dearborn, Michigan 48126

Re: Our Claim Number: [Redacted]
Our Insured's Name: [Redacted]
Date of Loss: 03/15/2003

Dear Ms. Norton:

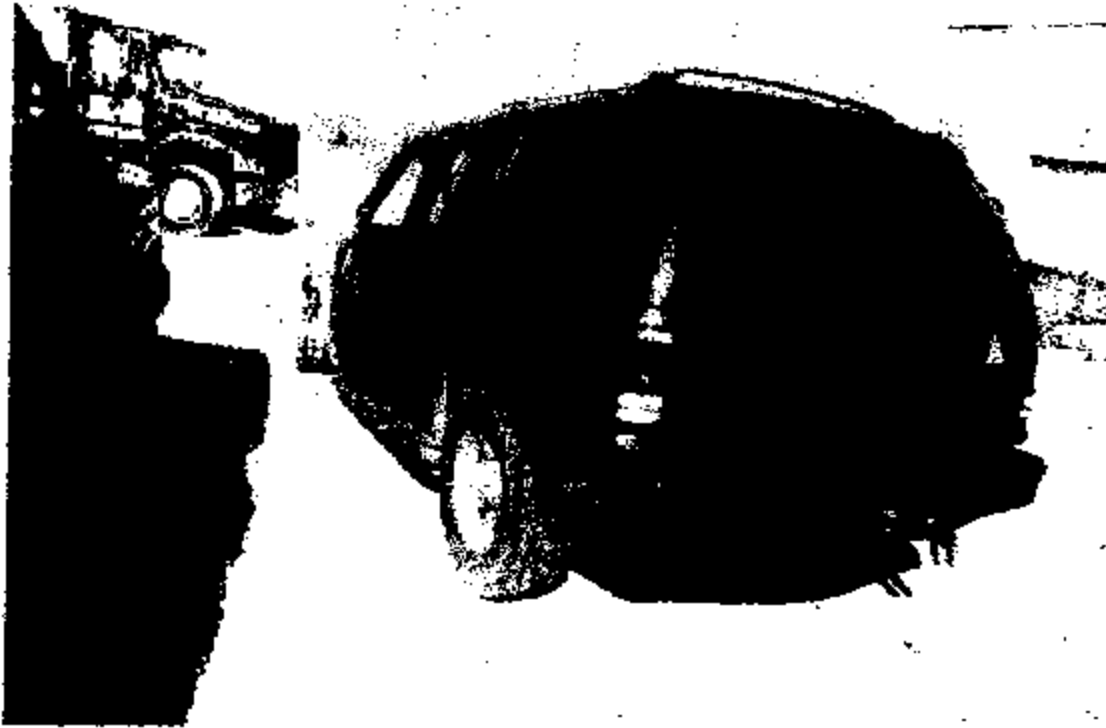
In response to your letter date October 19, 2004 please find the color photo's of the damaged vehicle that was owned by [Redacted]

I am sure you now have all the needed information that was requested.

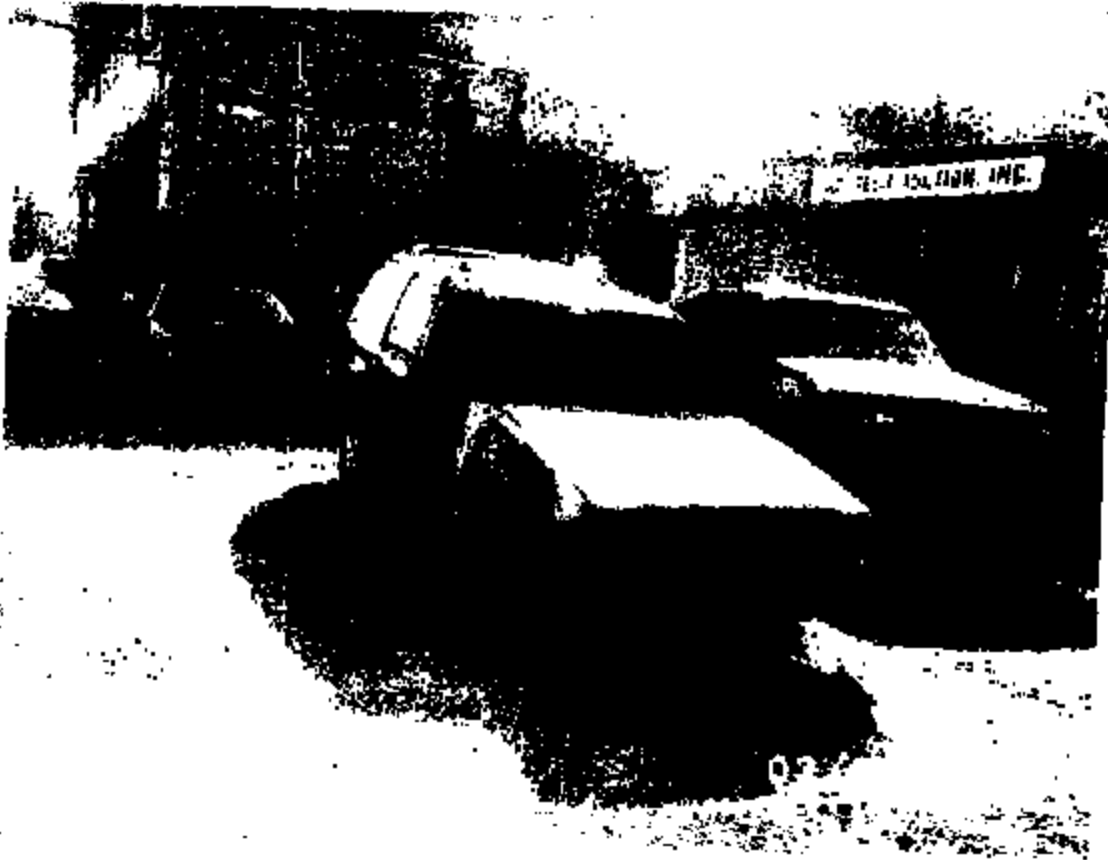
If you have any questions or need any additional information please feel free to contact the undersigned.

Sincerely,
Lena McGee
Lena McGee
Claims Representative
201 512 2768

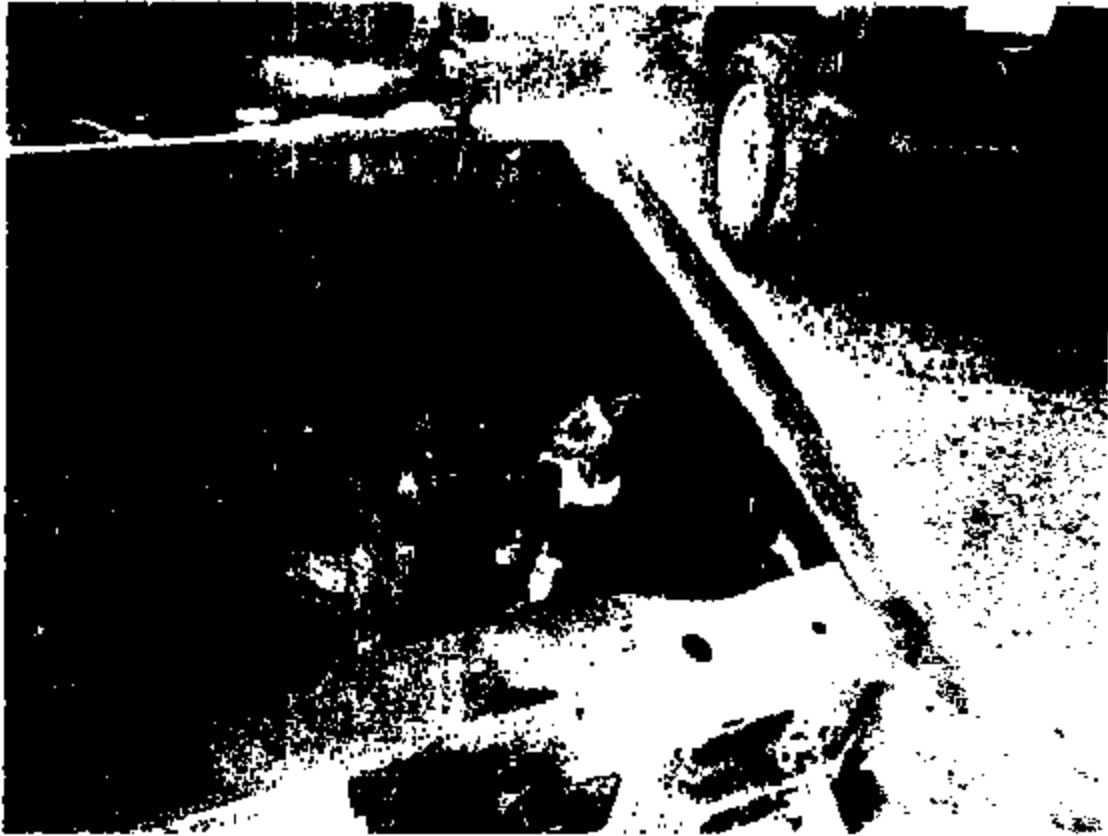
Handwritten notes:
ISO - 2/7/05
EXP - NO
- '00 EXP
BOW 7
HCC
4yrs - exp. 2/7/04
CLD - YES



713204



7/13/2014



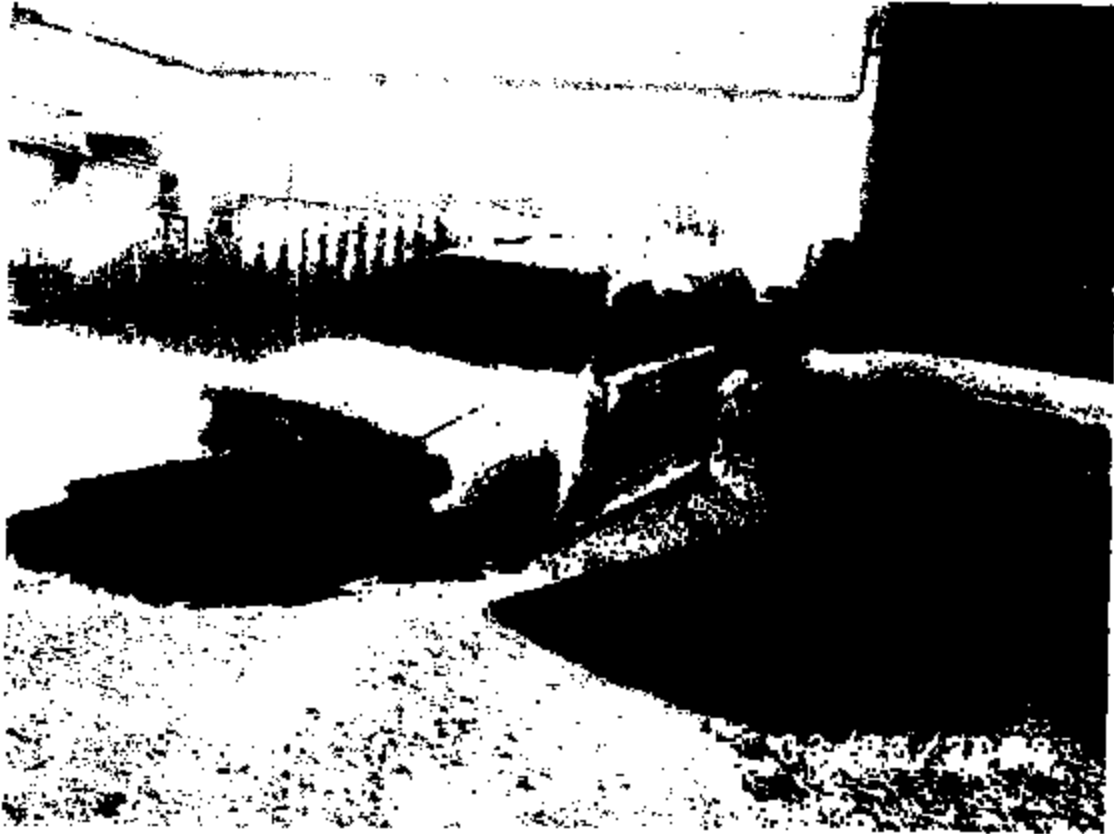
7/13/2014



3/26/03



.. 7:13:2004



7/13/2004



7/13/2014



7/13/2004

COPY

**Cecil Fire Company #1, Inc.
Fire Report**

COPY 4/4/03

Date: 3-15-03
CFC Run #: 654
Day / Night Circle One
OIC: 504

County Run #: 7205
Dispatched: 2048
Responding: 2054
On Location: 2101
Available: 2109

Type of Alarm: VEHICLE

Address: 100 E. PINEY HOLLOW RD

Building Information

Construction _____ Height _____ Sq. Ft. _____
Location of Fire _____
Discovered (reported by) _____
Point of Origin _____
Cause _____ Control _____
Investigation Req. _____ By _____
Smoke Detectors (Y/N/#) _____

Vehicle Information

Year 2000 Make FORD Model EVOLONG
Vin/Serial # 1FMZU73E4Y2 _____
Registration _____ State NJ
Cause FLAME Control BY 1/2 - TAN
Investigation Req NE By _____

Brush Fire Information

Size _____ State Forest Fire (Y/N/Unit #) _____
Cause _____ Control _____
Property Lost _____
Value \$ _____

Other

DO NFIRS

COPY 4/4/03

Owner Information

Name _____
Address _____
Phone # _____ VINELAND NJ _____ Ins. Company _____

COPY

Occupant Information

Name _____
Address _____
Phone # _____ Ins. Company _____

Equipment Information

Drivers
2951 _____ 2952 WANSWICK 2953 _____
2954 Q TOWNS 2955 _____ 2956 _____
2957 MILLS 2958 _____ 2959 WICKSTAN
Auto _____ 2950 _____ EMS _____

Total Responding _____ Miles (One way) _____

Hoses
Booster (ft) _____ 1 1/4" (ft) _____ 2 1/2" (ft) _____ 4" (ft) _____
Total Feet _____ Pump Time _____

Ladders:
Aerial (ft) _____ Extension (ft) _____ Roof (#) _____

Extinguishers (#):
Dry Chemical _____ CO2 _____ Met-1-x _____ Indian Tank _____

Equipment Damaged _____

Injuries

Firefighters _____ Civilians _____

Deaths

Firefighters _____ Civilians _____

Summary

Temperature _____ Wind (direction/speed) _____

Narrative ENGINE'S MALFUNCTION STARTED FIRE UNDER HOOD,
SPREADING TO PASSAGE COMPARTMENT. DRIVER STATED
SMOKE BEGAN COMING FROM DRIVER SIDE PULLED OFF, GOT
OUT AND CALLED FOR HELP, VEHICLE BEGAN TO BURN.

Name/Line #: SE **COPY**

VEHICLE REMOVAL
OR IMPOUNDING
REPORT

POLICE DEPARTMENT
TOWNSHIP OF MONROE

Case or
Accident No. 03-4989
Complaint No. _____

Date 2/15/03 Time 2040 Location PINEY HOLLOW RD

Registered _____ Street 107 PINE AVE City VINELAND
Owner _____ State _____ Zip _____ Phone _____
Owner Notified by _____ Date _____ Time _____

- IMPOUNDED
- STOLEN CAR
- ACCIDENT
- Traffic Hazard
- REMOVAL
- ABANDONED CAR
- Criminal Investigation
- Drunken Driving

Person Authorizing Removal M.T.P.D Summons No. _____ Charge _____

Removed by _____
(Towing Service) ASAPKS Demand to _____

--- DESCRIPTION OF VEHICLE ---

Make SAFARI Year 00 Body Type SUV Model EXP Color GRN
Registration No. LWN 10X Serial No. _____
Condition of Vehicle at time of Removal _____

- Radio
- Heater
- Rear View Mirror
- Tires (number) _____
- Clock
- Lighter
- Side Mirror
- Spot Light
- Cushions
- Horn
- Hub Caps
- Fog Light

--- TOOLS ---

- Jack Handle
- Jack
- Wrench
- Other _____

Signature of Officer _____ Date of Report _____ Badge No. _____

Released by SA [Signature] Date 2/15/03

Released To (claimant's signature) Madie [Signature] Date _____

--- PROPERTY FROM VEHICLE ---

--- REMARKS ---



G R O U P

NCO Financial Systems, Inc.

Subrogation Services

*500 North Franklin Turnpike
Ramsey, New Jersey 07446*

PHONE: 866-836-9845

FAX: 201-818-9840

Certified Mail: 7004 0750 0003 5852 8877

June 4, 2004

Ford Motor Company
C/O CT Corporation System
1515 Market Street
Suite 1210
Philadelphia, PA 19102
Attn: Auto Claims

Re: Our Claim Number: [Redacted]
Our Insured's Name: [Redacted]
Your Insured: Ford Motor Credit
Date of Loss: 03/15/2003

To Whom It May Concern:

Please be advised that our office has been retained by One Beacon Insurance Company to obtain reimbursement of the Property Damage benefits made on behalf of their insured, Nadezhda Melnichuk.

One Beacon has made payments as follows:

1.	\$ 17004.84	-Loss Paid
2.	\$ 500.00	-Insured's Deductible
3.	\$ 390.00	-Rental
4.	\$ 1599.00	-Expenses
	\$ 19493.84	-Total Payments

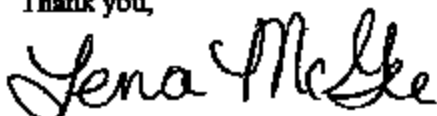
100
 - 3/15/03
 - \$ 19,493.84
 - 2/7/00 - WSD
 - NO ESP
 - '00 EXP
 - VIN
 - ~29,000 (M)

Enclosed please find the following proofs of loss:

1. Estimates
2. CCC Evaluation
3. Proofs of Payment
4. Police Report
5. Fire Report
6. Hard Facts Investigation

We would prefer to resolve this matter amicably, however, if we do not receive your payment within twenty-one (21) days of receipt of this letter, we will have no alternative but to file a formal demand for inter-company arbitration with Arbitration Forums, Inc. If you are not a signatory to Arbitration Forums, Inc. and do not wish to voluntarily resolve this matter, please advise if you will consent to having this matter resolved through Arbitration Forums, Inc. If you do not consent to same, we will have no alternative but to exercise all available remedies to protect our client's interests.

Thank you,



Lena McGee
Claims Representative
NCO FINANCIAL SYSTEMS, INC.

Enclosure (s)

HARD FACTS™

INVESTIGATIVE

ENGINEERING

April 24, 2003

*Kristin Knoebl
NJ Skylands Insurance
131 Morristown Road
Basking Ridge, New Jersey 07920*

**INVOICE #230431
TAX ID #22-3095388**

FOR SERVICES RENDERED IN THE ENGINEERING INVESTIGATION OF:

**Claim # [REDACTED]
DL: March 15, 2003**

Field examination of the subject vehicle to determine the cause and origin of the vehicular fire occurrence.

BALANCE DUE

\$635.00

April 24, 2003

Kristin Knoebf
NJ Skylands Insurance
131 Morristown Road
Basking Ridge, New Jersey 07920

Re: [REDACTED]
Claim # [REDACTED]
D/L: March 15, 2003

Dear Ms. Knoebf:

Pursuant to your request, this organization had initiated a forensic automotive examination of the subject vehicle on April 15, 2003 where it was staged as salvage at CarTech in Carteret, New Jersey under stock number 166281.

It is our understanding that the purpose of this assignment is to determine, within reasonable scientific and engineering certainty, the cause and origin of the vehicular fire occurrence. To that end, the results of our thorough field examination and subsequent activities follow.

DESCRIPTION OF VEHICLE

The subject vehicle is a 2000 Ford Explorer XLT 4x4 manufactured in St. Louis, Missouri by Ford Motor Company in January 2000. During assembly the vehicle was assigned public vehicle identification number 1FMZU73E4Y [REDACTED]. Computer scrutiny of this number relative to check digit '4' and sequence number [REDACTED] confirms the validity of the vehicle's identity.

At the time of the examination the vehicle displayed a New Jersey state license plate tag, [REDACTED] on the rear hatch. Compliance with state safety and emissions criteria as well as the vehicle utility could not be ascertained as they were consumed during the fire occurrence.

The subject vehicle could be best described as a domestically designed and manufactured, multi-passenger sport utility vehicle displacing a 4,148-pound curb weight.

EXTERIOR EXAMINATION

The Explorer is green in color and appointed four doors and a rear cargo hatch which completes the 189-inch long, by 70-inch wide, by 67-inch high platform.

Initial evaluation of the glazing revealed the consumption of the front windshield while both left and the front right door glazing were shattered.

Additional examination foreclosed on any historic or current impact related damage. Current damage was restricted to fire induced heat annealing of the entire front portion of the platform including front fenders, front portion of both doors, roof and hood.

A wheelhouse examination disclosed 16-inch OEM (original equipment of the manufacturer) cast aluminum alloy wheels coupled to Goodyear tires sized P255/70/R16. Both rear tires exhibited approximately 8/32-inches of uniform bilateral tread depth. The front tires were unidentifiable as they were fire consumed.

INTERIOR EXAMINATION

The passenger compartment is apportioned with a front bench seat, mid mounted bench seat and rear cargo area.

Fire consumption was present towards the front of the compartment including the instrument panel as well as the headliner. The consumption pattern was consistent with the fire originating in the front of the vehicle and then breaching the cowl which allowed for propagation along the roof line of the interior. This explains why the entire headliner was consumed but most seating arrangements were only partially consumed.

POWER PLANT EXAMINATION

This vehicle is equipped with a 4.0-liter, six-cylinder gasoline powered engine, which is coupled to a four-speed automatic overdrive transmission and transfer case.

The power plant compartment was completely consumed. All aluminum and polymer based components were completely moltenized while the intake manifold had collapsed. This consumption coupled with the exterior panel annealing leads Hard Facts Engineering to conclude that the fire originated within the power plant compartment.

ORIGIN OF CAUSE

The subject vehicle fire occurrence was initiated within the power plant compartment. The locus point of the fire can be pinpointed to the left portion of this area in the vicinity of the fuel lines.

Statements from the Insured state that while she was driving she noticed smoke. Subsequent to pulling the vehicle over, the insured exited and it erupted into flames. The flames were focused around the power plant compartment area.

Examination of the power plant revealed severe consumption. Most aluminum and polymer based components had been consumed as a result of the fire. No signs of electrical balling, consistent with an over current condition within the wiring could be found.

The subject Explorer utilizes a mechanical return-less type fuel system. Pressurized fuel is supplied to the engine mounted fuel injectors by an in-tank mounted electric fuel pump. A pump mounted discharge check valve allows the system to maintain pressure during shutdown and to minimize starting problems. Additionally, a pulsating damper is used to minimize pump cavitation noise. In order to keep a constant fuel pressure between 30-65 psi, a pressure regulator is mounted in the fuel tank, attached to the fuel pump assembly. Excess fuel is bypassed through the regulator and dumped back into the fuel tank.

This fuel system integrates an electric fuel pump which is mounted inside the fuel tank. The pump delivers pressurized fuel to the fuel injection system through a series of fuel lines and specially designed fittings. Examination of the area adjacent to the left exhaust manifold revealed the forensic remains of the pressurized fuel transfer line. This line is manufactured with braided steel to add durability and resistance to fuel breach. The line connects the pressurized fuel supply line, which travels from the fuel pump to the front of the vehicle. The transfer line is then connected to the supply line which in turn supplies fuel to each manifold mounted fuel injection rail.

Further examination of the area surrounding the line revealed a peculiar burn pattern on the left valve cover. This pattern was on the underside of the valve cover only, directly above the area the fuel line and exhaust manifold are located. These facts indicate that a fuel containment abnormality from either a leaking or compromised fitting where the fuel transfer line and the aforementioned supply line convene permitted a breach of fuel from the system. Once this breach occurred, it came into contact with the hot exhaust manifold and the blaze in question was initiated.

Research into recent vehicle repairs revealed no service related to the loss. Additionally, it was not possible to determine if the nature of recent service repairs were intrusive and thereby facilitated the loss. Therefore, Hard Facts Engineering concludes that the loss in question was a result of a fuel breach which contacted the hot exhaust manifold and initiated the blaze in question.

RECALL INVESTIGATION

This organization initiated a computerized search within our databanks of safety related recalls and technical service bulletins identified by the National Highway Traffic and Safety Administration as well as the vehicle manufacturer regarding the vehicle's loss.

Currently there are six safety recall campaigns that have been initiated by the manufacturer which pertain to the subject vehicle, however, none pertain to the loss at hand.

ENGINEERING CONCLUSIONS

Incorporated within the confines of this forensic automotive engineering report, it is the opinion of this organization that the following facts have been identified for your consideration.

1. The subject vehicle sustained a fire occurrence that was initiated within the confines of the power plant compartment and eventually propagated throughout the passenger compartment where it was subsequently extinguished.
2. Consumption throughout the power plant compartment was evident. However, a peculiar consumption pattern on the lower portion of the left valve cover was of special notice.
3. Careful examination of the fire debris revealed a braided steel, fuel transfer line that retained a portion of the fuel supply line in the area of the peculiar consumption pattern. These lines junction adjacent to the left exhaust manifold that develops a sufficient amount of heat which could initiate a fire.
4. A fuel containment abnormality within these aforementioned lines is deemed to be responsible for the loss at hand.

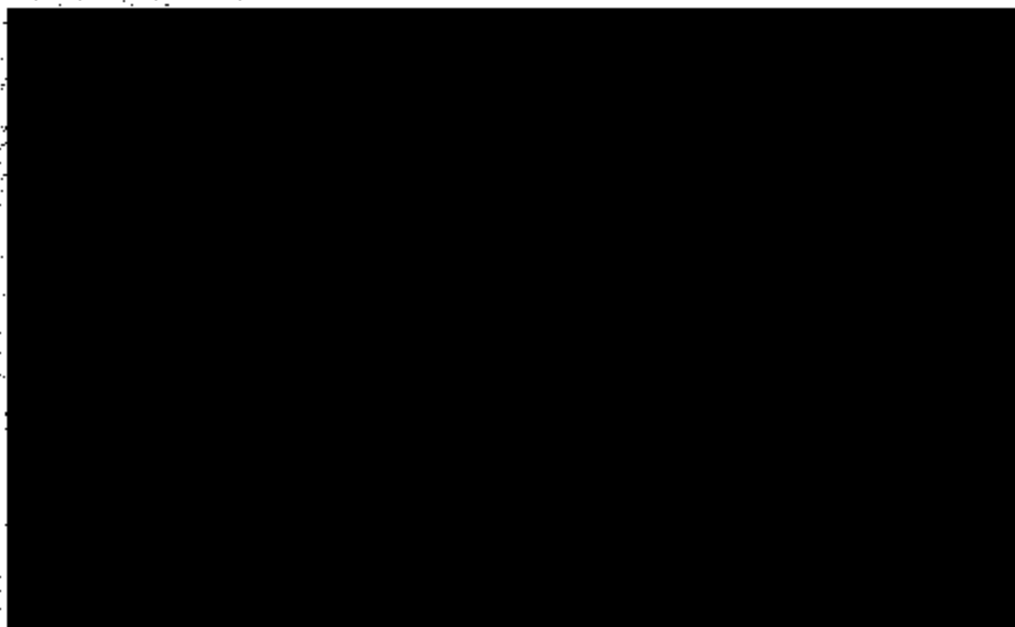
5. Based on the physical and forensic evidence, the vehicle manufacturer is responsible for the loss.

Should you have any further questions, please feel free contact us.

Very truly yours,

Tom McNamara, MME
Director and Principal of the Firm

Jonathan Vezzosi, EIT
Mechanical Engineer



NO. 04-01-403

FAYETTE CIRCUIT COURT

DIVISION 5th 2d

DIVISION NINE (9)

JAN 29 2005

[REDACTED]

Louisville, Kentucky [REDACTED]

PLAINTIFF

COMPLAINT

[REDACTED]

Dearborn, Michigan [REDACTED]

SERVE:

[REDACTED]

Louisville, Kentucky
VIA CERTIFIED MAIL

PAUL MILLER FORD, INC.
P.O. Box 1435
Lexington, Kentucky 40588-1435

DEFENDANTS

SERVE: HARRY B. MILLER
701 Security Trust
Lexington, Kentucky 40507
VIA CERTIFIED MAIL

Comes the Plaintiff [REDACTED], by counsel, and for
its cause of action against the Defendants, herein, states as follows:

1. That the Plaintiff, is an insurance carrier, registered with the [REDACTED]
of Insurance and regularly doing business within the Commonwealth of Kentucky.

2. That the Defendant Ford Motor Company is a foreign corporation licensed to do
business in the Commonwealth of Kentucky and doing business in the Commonwealth, consisting
of the delivery for sale of its vehicles in Lexington, Fayette County, Kentucky.

3. That the Defendant Paul Miller Ford, Inc. is a Kentucky Corporation licensed to do business in the Commonwealth of Kentucky and doing business in the Commonwealth, consisting of the selling, distributing, and/or retailing of vehicles manufactured by Defendant Ford Motor Company in Lexington, Fayette County, Kentucky.

4. That at all times pertinent to the within action, the Plaintiff had duly issued, and there was in full force and effect, a policy of insurance which obligated the Plaintiff to pay for damages sustained by its insured, [REDACTED] arising from his purchase of a vehicle manufactured by Defendant Ford Motor Company and sold by Defendant Paul Miller Ford, Inc. in Lexington, Fayette County, Kentucky.

COUNT I

5. The Defendant Ford Motor Company designed, manufactured, and distributed a 2001 Ford Explorer with a VIN number of 1FMZU77E51U [REDACTED] which was defective in its design, manufacture, and warnings, rendering it unreasonably dangerous for its expected and intended use.

6. The Ford Explorer was used in its intended and expected manner without substantial change.

7. The defects in the design, manufacture, and warning were a substantial factor in causing the fire which destroyed the Ford Explorer on February 3, 2002, in the Commonwealth of Kentucky.

8. That the aforesaid policy of insurance required the Plaintiff to pay, as a result of the defective design, manufacture, and warning of the Defendant Ford Motor Company, the sum of \$25,757.80 on behalf of Howard Brogan, and has therefore, been damaged by the Defendant.

9. The Plaintiff is entitled to recover from the Defendant Ford Motor Company its common law and equitable right of subrogation the reasonable sum of \$25,757.80.

COUNT II

10. The previous allegations contained in this Complaint are incorporated by reference into this Count.

11. Defendant Ford Motor Company was under a duty to exercise reasonable care in the design, manufacture, and warning of the 2001 Ford Explorer and was under a further duty to recall the Ford Explorer, warn users of potential dangers, or otherwise remedy known defects.

12. Defendant Ford Motor Company failed to exercise reasonable care in the design, manufacture, and warning of the 2001 Ford Explorer and further failed to exercise reasonable care in the recall, remedy, or warning of the Ford Explorer upon notice of its defects.

13. Defendant Ford Motor Company's failure to exercise reasonable care was a substantial cause of the fire which destroyed the Ford Explorer.

14. Pursuant to the aforesaid policy of insurance the Plaintiff was required to pay the sum of \$25,757.80 on behalf of its insured, [REDACTED] and has therefore, been damaged by the negligence of Defendant.

15. The Plaintiff is entitled to recover from the Defendant Ford Motor Company its common law and equitable right of subrogation, the reasonable sum of \$25,757.80.

COUNT III

16. The previous allegations contained in this Complaint are incorporated by reference into this Count.

17. As the manufacturer of the 2001 Ford Explorer, the Defendant Ford Motor Company made express and implied warranties and representations concerning the operation of the 2001 Ford Explorer.

18. Defendant Ford Motor Company breached these express and implied warranties and representations.

19. Pursuant to the aforesaid policy of insurance the Plaintiff was required to pay the sum of \$25,757.80 on behalf of its insured, [REDACTED] as a direct result of these breaches, and has therefore, been damaged by the Defendant.

20. The Plaintiff is entitled to recover from the Defendant Ford Motor Company its common law and equitable right of subrogation, the reasonable sum of \$25,757.80.

COUNT IV

21. The previous allegations contained in this Complaint are incorporated by reference into this Count.

22. As the seller, distributor and/or retailer of the 2001 Ford Explorer, Defendant Paul Miller Ford, Inc. made express and implied warranties and representations concerning the operation of the 2001 Ford Explorer.

23. Defendant Paul Miller Ford, Inc. breached these express and implied warranties and representations.

24. Pursuant to the aforesaid policy of insurance the Plaintiff was required to pay the sum of \$25,757.80 on behalf of its insured, [REDACTED], as a direct result of these breaches, and has therefore, been damaged by the Defendant.

25. The Plaintiff is entitled to recover from the Defendant Paul Miller Ford, Inc. its common law and equitable right of subrogation, the reasonable sum of \$25,757.80.

WHEREFORE, Plaintiff demands:

1. Judgment against the Defendants in the amount of \$25,757.80.
2. For its costs herein expended.
3. For any and all other relief to which it may appear properly entitled.

KRAUSER & BROWN



EDWARD A. BRUTSCHER

Attorney for Plaintiff

Kentucky Farm Bureau Mutual Insurance Company

325 W. Main Street Ste. 2100

Louisville, Kentucky 40202

(502) 588-9000

EFT

Engineering and Fire
Investigations

3150 Carter Drive
Suite 301
Lexington, KY 40517
877-271-8486
Tel: 859-245-6466
Fax: 859-245-7168
www.efiia.com

PRIVILEGED AND CONFIDENTIAL

ENGINEERING REPORT

FEBRUARY 20, 2002

PREPARED FOR: KENTUCKY FARM BUREAU
P.O. BOX 99595
LOUISVILLE, KENTUCKY 40269

ATTENTION: MR. DAVID OLSON

INSURED: [REDACTED]

DATE OF LOSS: FEBRUARY 3, 2002

**INSPECTION
LOCATION:** KENTUCKIANA AUTO STORAGE POOL
LOUISVILLE, KENTUCKY

CLAIM NUMBER: [REDACTED]

EFI FILE NUMBER: 94506-20032

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

ERG-005-LC1-4585

INTRODUCTION

On February 3, 2002, a 2001 Ford Explorer SportTrac 4x4 owned by the insured [REDACTED] of LaGrange, Kentucky, caught fire while the insured was driving the vehicle along I-71 in Oldham County, Kentucky.

On February 5, 2002, Mr. David Olson, of Kentucky Farm Bureau Insurance Company, contacted Engineering and Fire Investigations, Inc. (EFI) and requested EFI's assistance in determining the origin and cause of the fire.

On February 5, 2002, the author of this report, Scott Jones, P.E., C.F.E.I., EFI Mechanical Engineer, (877) 271-8486, was assigned to conduct the investigation. The observations and the conclusions from the investigation are contained in this report.

BACKGROUND

Interview with Mr. Howard Brogan, Insured

On February 5, 2002, the author of this report interviewed [REDACTED] to learn his observations with regard to the events before and during the fire.

[REDACTED] was driving the subject vehicle at highway speed on I-71 in Oldham County, Kentucky, when he noted erratic operation of the engine tachometer. The tachometer would drop to zero and then suddenly rise to proper engine speed. Soon thereafter, the engine started making "dying noises," so [REDACTED] reportedly pulled off the highway onto the shoulder.

After stopping with the engine operating, [REDACTED] reportedly noted smoke emanating from underneath the engine. He immediately entered the passenger compartment and stopped the engine. By the time that he again exited the vehicle, fire had emanated from beneath the engine. Authorities were alerted of the event.

First responders reportedly arrived approximately 30 minutes after notification. The vehicle was completely involved by fire at the time of their arrival.

[REDACTED] reported that the vehicle had 12,000 to 13,000 miles at the time of the loss. The vehicle reportedly had minor service performed two times at the LaGrange, Kentucky, Wal-Mart. [REDACTED] believed that Wal-Mart had changed the oil during both service events, and the last service event was approximately 3,000 miles prior to the fire.

Mr. Brogan did not note unusual odors or performance anomalies at any time prior to the event. He reported the VIN as 1FMZU77E51U [REDACTED]

CLAIM NO. [REDACTED]

OBSERVATIONS

On February 6, 2002, the author of this report traveled to the Kentuckiana Auto Storage Pool (KASP) at 4420 Poplar Level Road in Louisville, Kentucky, to perform the inspection of the subject vehicle. The vehicle, which was listed as KASP stock number H68315 (*Photograph 1*), was located in the secured back lot at KASP. The vehicle was identified with Kentucky license plate [REDACTED] (*Photograph 2*), and the dashboard VIN plate (*Photograph 3*) was melted in the event.

The entire vehicle was extensively damaged due to the extended burn duration. *Photographs 4 and 5* show front and rear views of the vehicle, respectively. *Photographs 6 and 7* show the passenger's and driver's sides of the vehicle, respectively. *Photograph 13* shows the frame rails lying beneath the rear truck bed region.

Nearly all elastomer, zinc, and aluminum components inside the passenger's compartment were consumed or melted in the fire. *Photographs 8 and 9* show the dashboard region. *Photograph 10* shows a melted termination to a dashboard wiring harness. *Photograph 11* shows a one-gallon metal container discovered in the front seat region. *Photograph 12* shows the remnants of the rear seat region.

Engine Compartment Inspection

The top surface of the engine compartment hood is shown in *Photograph 14*. The lower hood support structure, which was still connected to it hinges, is shown in *Photograph 15*. *Photograph 16* shows the extensive damage to the engine and associated systems. All elastomer materials in the engine compartment were consumed in the fire.

Photograph 17 shows a forward looking aft view of the engine brake booster and the remnants of the engine compartment fuse and relay box. Reference *Photograph 39* for a view of an exemplar fuse and relay box mounted in a 2002 Ford Explorer Sport Trac (*Photograph 37*).

Photograph 18 shows a view of the extent of damage to the passenger's side of the engine. The remnants of the lug connections to the battery were discovered (*Photograph 19*). No battery remnants were discovered.

The engine compartment fuse and relay box remnants (*Photograph 21*) were unbolted from the fender to reveal the firewall interface connector for various power and signal conductors (*Photograph 22*). The author inspected individual conductors in and around both the fuse and relay box and the firewall interface region and found no indication of inadvertent conductor-to-conductor or conductor-to-ground shorting.

The author conducted an extensive tactile and visual inspection of the large gage stranded conductors from the engine starter and starter solenoid to the battery lugs. There were no indications of conductor-to-conductor shorting or conductor-to-ground shorting along the conductors.

The author conducted an extensive tactile and visual inspection of the stranded conductors from the engine alternator to the fuse and relay box region. *In the area of an engine-mounted harness support (Photograph 23) located at the front end of the driver's side upper control arm, both the alternator output conductor and the alternator field conductor had indications of conductor-to-ground shorting.*

Photograph 24 shows arcing and melting damage on a conductor, believed to be the alternator field conductor. (Author's Note: The alternator was completely destroyed during the fire. The subject conductor entered the region where the alternator had been located.) Photographs 25 and 26 show detailed views of the fused conductor strands after the region was cleaned using a soft brass brush.

The associated engine-mounted harness support was inspected for indications of arcing. As shown in *Photographs 27 through 29*, arcing and copper transfer was discovered along one of the top edges of the stamped steel harness support bracket.

The alternator output conductor was also discovered melted (*Photographs 30 and 31*) at the location of the subject harness support bracket. The end of the conductor had separated by tensile forces as shown in the photograph. The strands appeared to have been abnormally squeezed together just prior to the separation (*Photograph 31*).

The author inspected the harness support on an exemplar 2002 Ford Explorer Sport Trac and discovered the configuration shown in *Photograph 38*. The battery and alternator conductors traveled along the upper surface of the support bracket inside a corrugated plastic chafe guard.

The author removed a sample of the chafe guard from a 2000 Ford Explorer located adjacent to the subject vehicle at KASP (*Photograph 35*). To test the flammability characteristics of the chafe guard, the author held a cigarette lighter to the end of the sample. The chafe guard immediately caught fire and supported the flame (*Photograph 36*) until the entire sample was consumed.

Melted copper from an unidentified conductor or fitting was discovered on the steel discharge tube from the air conditioning compressor as shown in *Photographs 32 through 34*.

DISCUSSION/CONCLUSIONS

The author conducted a visual inspection of the conductors located in the passenger's compartment of the subject vehicle. Due to the duration and intensity of the fire, many of the copper conductors had separated and melted. As the witness report held that the first indication of smoke was from below the engine, the passenger's compartment wiring was not suspected of causation in the fire.

The author conducted an extensive inspection of the small gage stranded conductors located in and around the engine compartment fuse and relay box and the firewall interface to the passenger's compartment. There were no indications of conductor-to-conductor

shorting or conductor-to-ground shorting. It is not believed that the small gage conductors had causation in the event.

The author conducted an extensive visual and tactile inspection of the large gage conductors leading to the engine starter and starter solenoid. There were no indications of conductor-to-conductor shorting or conductor-to-ground shorting. It is not believed that the starter conductors had causation in the event.

The author conducted an extensive inspection of the alternator field and output conductors. The alternator field conductor strands were melted together for approximately 3 inches at the location of an engine-mounted harness support bracket and showed indications of extensive electrical arcing with the bracket. The conductor and bracket are shown in *Figure 1* below, which was created from *Photograph 27*.



Figure 1 - ARCING LOCATION BETWEEN ALTERNATOR FIELD CONDUCTOR (LEFT) AND SUPPORT BRACKET (RIGHT)

It is believed that the following sequence occurred:

- While the insured was driving the vehicle, the alternator field conductor came into contact with the associated support bracket and intermittently arced to the bracket. It should be noted that the support bracket had sharp edges facing the harness containing the conductor.
- The insured noted the event by erratic operation of the electrically driven engine tachometer and the "dying sounds" as the engine's primary electrical system was intermittently grounding. The insured pulled off the highway.
- As the arcing continued with the engine running, the arcing served as the ignition source for the surrounding conductor (PVC) insulation, which was the first fuel to

the fire. The fire rapidly spread into the highly combustible corrugated plastic chafe guard surrounding the harness conductors.

- The fuel hose, with no flame-resistant sheathing, passed approximately three inches above the harness region, which caused eventual failure of the hose and extension of the fire to underneath the engine.
- The insured's first observation of fire beneath the engine was most probably flaming gasoline from the failed fuel hose that was ignited from the conductor insulation and chafe guard fire immediately below the fuel hose.

It should be noted that the author discovered the alternator output conductor, which was contained in the same harness as the field conductor, extensively melted and physically deformed by the harness support and/or installation process.

It is believed that the Ford Motor Company is directly responsible for the fire due to the following design and assembly practices:

1. The alternator output conductor was abnormally deformed in the vicinity of the harness support bracket due to poor installation practice.
2. The subject harness support bracket had sharp upper edges exposed to the associated harness. It is good design practice to break the edges (i.e., provide 0.015 inch radius by tumbling or other means).
3. The fuel hose did not appear to have a flame resistant sleeve installed along its length in the engine compartment. It is good design practice to have silicon rubber sleeve around a flammable fluid hose to avoid the extension of an otherwise isolated fire.
4. It is very poor design practice to use a highly flammable chafe guard to protect cables that are otherwise flame retardant.

The discussion and conclusions are based upon information reviewed to date, plus general engineering knowledge and experience. Information reviewed at a later date may warrant modifying or augmenting the conclusions.

We appreciate the opportunity to work with you on this evaluation. Pending further direction, this file is considered closed. Please let us know whether we can be of further assistance to you.

Sincerely,

Engineering and Fire Investigations

Scott A. Jones, P.E., C.P.E.I.
Mechanical Engineer
(812) 945-3820



Photograph 3
View of the partially consumed VIN identification plate mounted on the dashboard.



Photograph 4
Front view of the subject 2001 Ford Explorer Sport Trac.



Photograph 5
Rear view of the subject 2001 Ford Explorer Sport Trac.



Photograph 6
View of the passenger's side of the subject vehicle.



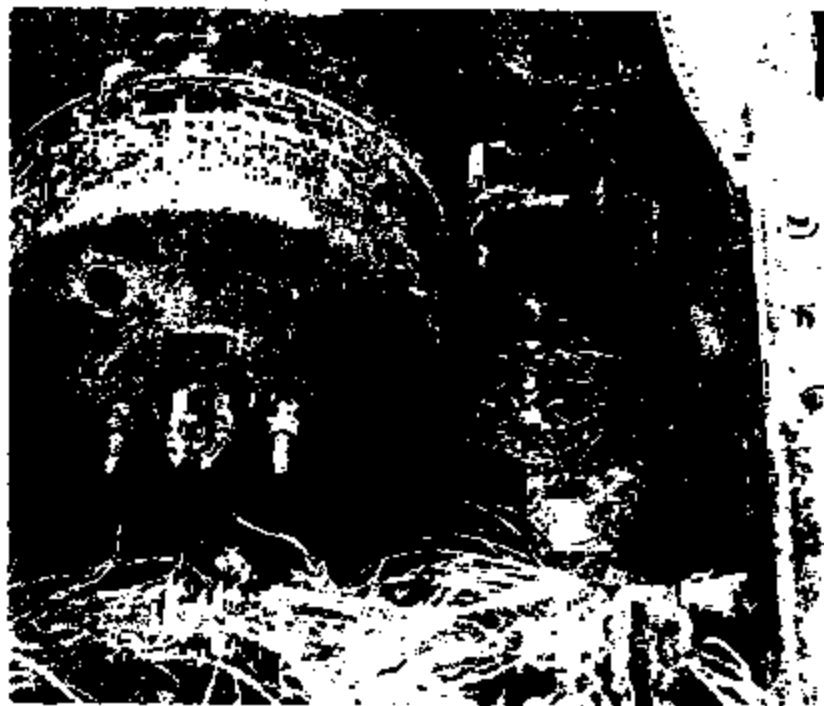
Photograph 19
View of large gage stranded conductors connected to battery.



Photograph 20
View of fire wall-mounted grounding strap lug.



Photograph 21
View of engine compartment fuse and relay-box remnants.



Photograph 22
View of driver's side firewall harness interface.



Photograph 23
View of driver's side conductor support.



Photograph 24
View of melted section of alternator field conductor at driver's side conductor support.



Photograph 25
Detailed view of arcing and melting damage on alternator field conductor.



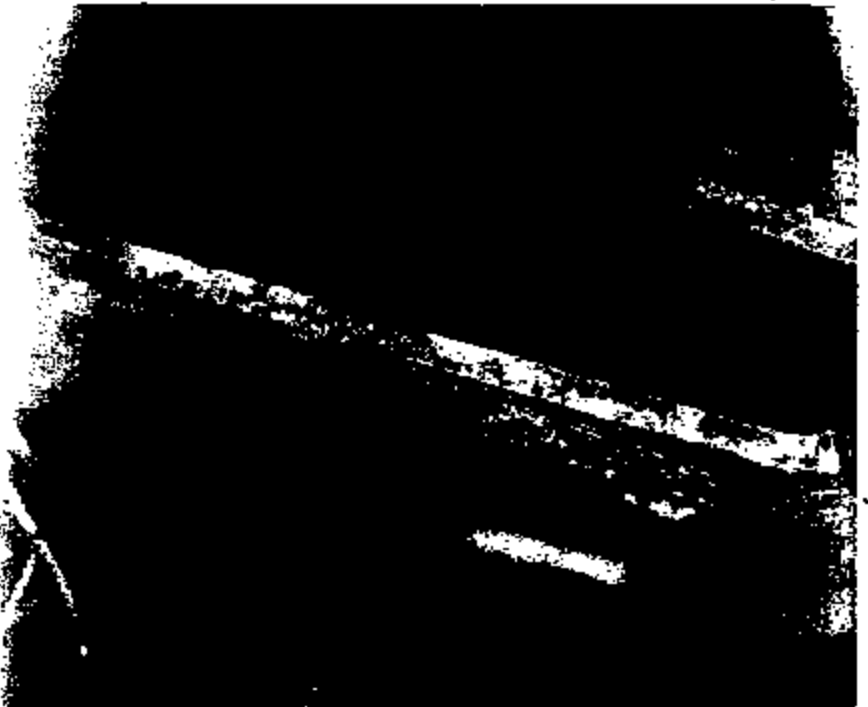
Photograph 26
Detailed view of arcing and melting damage on alternator field conductor.



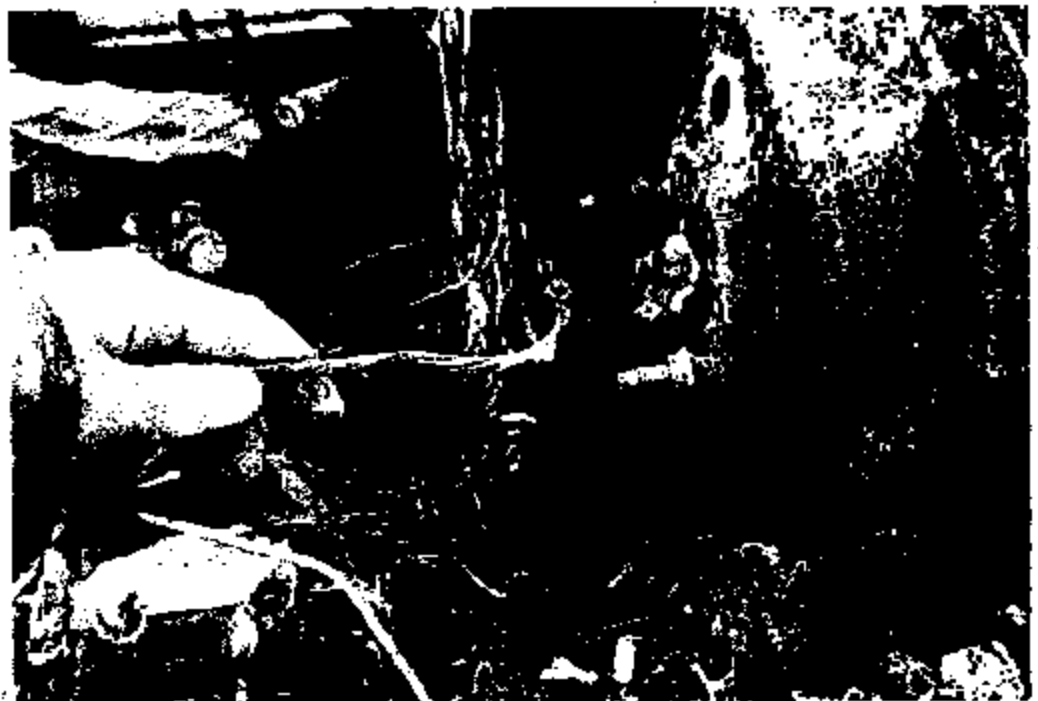
Photograph 27
View of damaged alternator field conductor and associated arcing damage to conductor support.



Photograph 28
View of arc damaged area to conductor support bracket.



Photograph 29
View of fire damaged area to conductor support bracket.



Photograph 30
View of separated and melted aftermath B- conductor.



Photograph 31
View of separated and melted alternator B+ conductor.



Photograph 32
View of copper transfer onto air conditioning compressor discharge connection.



Photograph 33
View of copper transfer onto air conditioning compressor discharge connection.



Photograph 34
View of copper transfer onto air conditioning compressor discharge connection.



Photograph 35
View of Ford corrugated chafe guard utilized on battery conductors.



Photograph 36
View of open flame caused by ignition of Ford corrugated chafe guard.

LaGrange Fire & Rescue Department -- Fire Alarm Report

INCIDENT LOCATION: 393 @ 18 1/2 N ENTRANCE					STATION NUMBER 1		
DATE	RUN NUMBER	IN-TIME	ON-SCENE	AVAILABLE	INCIDENT BOX NUMBER		
213 102	01-139	12:27	12:23 12:23	13:25			
NATURE OF CALL: VEHICLE FIRE							
OWNER: [REDACTED]				PHONE NUMBER: [REDACTED]			
OWNERS ADDRESS: [REDACTED]				Campellsburg Ky			
OCCUPANT NAME: [REDACTED]				PHONE NUMBER: [REDACTED]			
OCCUPANCY TYPE: [REDACTED]				NUMBER OF STORES: [REDACTED]			
SITUATION FOUND: Car fire				INCIDENT COMMAND: H201			
ACTION TAKEN: Extinguishment - fully involved.							
COMPANY RESPONSE:		INJURIES:		FATALITIES:			
01 <input checked="" type="checkbox"/>	33 []	NO INJURIES	[]	NO FATALITIES	[]		
02 []	41 []	FIRE SERVICE	[]	FIRE SERVICE	[]		
03 []	51 []	CIVILIAN	[]	CIVILIAN	[]		
04 []	61 <input checked="" type="checkbox"/>	TOTAL NUMBER:		TOTAL NUMBER:			
05 []	62 []	POSSIBLE CAUSE OR DETERMINATION:		NUMBER OF ALARMS:			
06 []	63 []	Possible transmission overheat or fluid leak -		01 <input checked="" type="checkbox"/>	04 []		
07 []	71 []			02 []	05 []		
08 []	72 []			03 []	06 []		
21 []	73 []						
31 <input checked="" type="checkbox"/>							
32 []							
VEHICLE ONE INFORMATION				VEHICLE TWO INFORMATION			
MAKE: <input checked="" type="checkbox"/> Ford				MAKE:			
MODEL: Sport-Trac				MODEL:			
VEHICLE YEAR:		COLOR:		VEHICLE YEAR:		COLOR:	
LICENSE NUMBER: 9218 HG		STATE: KY		LICENSE NUMBER:		STATE:	
VIN NUMBER:				VIN NUMBER:			
OWNERS NAME:				OWNERS NAME:			
OWNERS ADDRESS: Above				OWNERS ADDRESS:			
HOSE LINES USED				HOSE LINES USED			
Size	Type	From	To	Size	Type	From	To
1 3/4	Attack	4531	Fire				

SIGNATURE OF PERSON MAKING OUT REPORT:

A. H. Hebra

Personnel On Apparatus

ENGINE 4531	ENGINE 4532	ENGINE 4533
OFFICER: <i>Smith</i>	OFFICER:	OFFICER
ENGINEER: <i>Hillebrandt</i>	ENGINEER:	ENGINEER
1ST LINE: <i>Russow</i>	1ST LINE:	1ST LINE
2ND LINE: <i>NASON</i>	2ND LINE:	2ND LINE
UTILITY: <i>Bowman</i>	UTILITY:	UTILITY
CREW: <i>GREGORY</i>	CREW:	CREW
QUAD 4541	QUINT 4551	ENGINE 4521
OFFICER:	OFFICER:	OFFICER
ENGINEER:	ENGINEER:	ENGINEER
1ST LINE:	1ST LINE:	CREW
2ND LINE:	2ND LINE:	UTILITY 4591
UTILITY:	UTILITY:	DRIVER
CREW:	CREW:	CREW
TANKER 4561	TANKER 4562	TANKER 4563
ENGINEER: <i>Bryant</i>	ENGINEER:	ENGINEER:
CREW: <i>Williams</i>	CREW:	CREW
FIELD UNIT 4571	FIELD UNIT 4572	FIELD UNIT 4573
ENGINEER:	ENGINEER:	ENGINEER
CREW:	CREW:	CREW
PERSONNEL AT STATION		PERSONNEL AT STATION
<i>KEVIN THOMPSON</i>		
<i>DONNA WILLIAMS</i>		
COMMENTS & REMARKS		



KENTUCKY UNIFORM POLICE TRAFFIC COLLISION REPORT

RESUB. RE-PLACE ORIGINAL
VERSION NUMBER MASTER FILE #

DRAFT

INVESTIGATING AGENCY

OLDHAM COUNTY POLICE

AGENCY OR NUMBER

KY0930400

LOCAL CODE

C2022301

ROADWAY NAME

I 71

PARKING LOT

INTERSECTION WITH

BETWEEN STREETS

ROADWAY #

I 71

MILES FEET

0

WEIGHT

18

INJURED

KILLED

VEHICLES INVOLVED

NO. 1

NO. 2

SPEED LIMIT

65

IN CITY LIMITS

SALES FROM CITY

CITY/TOWN - Write name below and enter code to the right.

LATITUDE

38

LONGITUDE

22

DATE

547

COLLISION DATE

02032002

TIME

1230

COLLISION TIME

1230

DATE

02032002

BUCKNER

MANNER OF COLLISION

- ANGLE
- BACKING
- HEAD ON
- OPPOSING LEFT TURN
- REAR END
- REAR TO REAR

- SLOPES OPPOSITE DIRECTION
- SLOPES SAME DIRECTION
- SINGLE VEHICLE

LOCATION 1ST EVENT

- GOVE
- MED. AT
- ON ROADWAY
- OUTSIDE SHOULDER, LEFT
- OUTSIDE SHOULDER, RIGHT
- SHOULDER

- OTHER PROPERTY

TRAFFIC CONTROL

- ADVISORY SPEED SIGN
- CENTER LINE
- CURVE SIGN
- FLASHING LIGHT
- MESH

- NO PASSING ZONE
- OFF CENTER FLAGMAN
- RR. GATES
- RR. SIGN OR SIGNAL
- SCHOOL ZONE SIGN
- STOP & GO SIGNAL

- STOP SIGN
- WARNING SIGNS
- YIELD SIGN
- OTHER
- NONE

ROADWAY TYPE

- COUNTY ROAD
- FEDERAL
- FRONTAGE ROAD
- INTERSTATE
- LOCAL STREET

PARKWAY

- STATE
- NONE OF THESE

TOTAL LANES

- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
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- 38
- 39
- 40
- 41
- 42
- 43
- 44
- 45
- 46
- 47
- 48
- 49
- 50

ROADWAY CHARACTER

- CURVE & GRADE
- CURVE & HILLCREST
- CURVE & LEVEL

STRAIGHT & GRADE

- STRAIGHT & GRADE
- STRAIGHT & HILLCREST
- STRAIGHT & LEVEL

ROADWAY SURFACE

- ASPHALT
- CONCRETE
- GRAVEL
- OTHER

ROADWAY CONDITION

- DRY
- ICE
- SAND, SLOTTED OR D. GRAVEL
- UNKNOWN
- WET

WEATHER

- BLOWING SAND, SOIL
- DIRT, SNOW
- CLEAR
- CLOUDY
- FOG, SMOG, SMOKE
- FOG WITH RAIN
- RAINING
- SEVERE CROSSWINDS
- SLEET/HAIL
- SNOWING
- OTHER

LIGHT CONDITION

- DAWN
- DAYLIGHT
- DUSK
- DARKNESS - HIGHWAY LIGHTS OFF
- DARKNESS - HIGHWAY LIGHTS ON
- DARKNESS - HIGHWAY NOT LIGHTED

LAND USE

- BUSINESS
- INDUSTRIAL
- LIMITED ACCESS
- PARK
- PRIVATE PROPERTY
- RESIDENTIAL
- RURAL
- SCHOOL

SCHOOL BUS RELATED

- DIRECTLY
- INDIRECTLY
- NOT APPLICABLE

FIRST AID AT SCENE

FIRST AID GIVEN BY

INJURED REMOVED TO

EMS AGENCY AND RUN #

EMS AGENCY AND RUN #

EMS AGENCY AND RUN #

DISNOTIFIED TIME

EMERGENCY TIME

EMERGENCY AT HOSPITAL

EMERGENCY TIME

EMERGENCY TIME

EMERGENCY AT HOSPITAL

DISNOTIFIED TIME

EMERGENCY TIME

EMERGENCY AT HOSPITAL

INJURED OR DECEASED REMOVED BY

- FUNERAL HOME/OWNER'S VEHICLE
- HELICOPTER/OTHER AIR VEHICLE

- MUNICIPAL EMERGENCY VEHICLE
- POLICE AMBULANCE

- POLICE CAR
- PRIVATE AMBULANCE

- PRIVATE VEHICLE
- OTHER

DESCRIPTION OF COLLISION

Unit 1 stated He was traveling north on I-71 when he felt his vehicle jerking. He stopped and raised the hood and the engine was already on fire.

CLAIM 13

FEB-25-2002

PHOTOS
PROCESSED
DATE

INVESTIGATOR

L.B. SIMPSON

TO NUMBER

311/3006

BEAT OR POST NO.

0413

TIME NOTIFIED

1235

TIME ARRIVED

1235

ROAD OPENED

1314

REPORTED BY

13



MASTER FILE #: **00861610**

LOCAL CODE

C2002301

1

PROPERTY DAMAGE-OTHER THAN VEHICLES

PROPERTY

OWNER ADDRESS

2

PROPERTY DAMAGE-OTHER THAN VEHICLES

PROPERTY

OWNER ADDRESS

3

PROPERTY DAMAGE-OTHER THAN VEHICLES

PROPERTY

OWNER ADDRESS

DIAGRAM
Indicate North by Arrow

CLAIM 13
FEB 25 2002

PAGE OF PAGES

2 3



MASTER FILE #: 00861610

458 04 01 000 1000

LOCAL CODE

F
1st Tot

C2002301

TOWED REMOVED TO: OCCUPANTS: 1
 OPERATOR'S LIC. NO. 1 **BARRECKMAN'S**
 STATE KY
 OPERATOR'S LICENSE RESTRICTIONS: COMM CO. RESIDENT
 COL DRIVER
 OPERATOR LAST NAME: ██████████ FIRST NAME: ██████████ M.I.: S

PEDESTRIAN FACTORS
 APPROACHING OR LEAVING VEHICLE
 AT INTERSECTION
 CROSSING AGAINST SIGNAL
 CROSSING WITH SIGNAL
 DARK CLOTHING NOT VISIBLE
 DARTING INTO ROAD
 ENTERING
 BEING RELATED
 GETTING ON/OFF VEHICLE
 NOT CROSSING
 STOPPING

CROSSING ROADWAY
 NOT AT INTERSECTION
 NOT IN ROADWAY
 PHYSICAL IMPAIRED
 PLAYING IN ROADWAY
 PUSHING VEHICLE
 SKATING/SKATEBOARDING
 WALKING IN ROADWAY
 MOTORCYCLE IN ROADWAY
 WORKING ON VEHICLE

DATE OF BIRTH: ██████████ CITY: **CAMPBELLSBURG** STATE: **KY** ZIP CODE: ██████████
 INVOLVED PERSONS: NAME, ADDRESS, CITY, STATE AND ZIP: ██████████
 DATE OF BIRTH: 11 12 13 14 15 16 17 18 19 20 21 22 23

NAME: **OPERATOR** DATE OF BIRTH: **04-27-1959**
 ADDRESS: ██████████
 NAME: ██████████ ADDRESS: ██████████
 NAME: ██████████ ADDRESS: ██████████
 NAME: ██████████ ADDRESS: ██████████
 NAME: ██████████ ADDRESS: ██████████

VEHICLE YEAR MAKE MODEL TYPE STATE PERMITS YEAR
2001 Ford SPORT TRAC LL KY 2002
 VEHICLE ID NUMBER: **1F2ZU77E51U** NAME OF INSURANCE CO.: **KY FARM BUREAU** COLOR OF VEHICLE: **SILVER**

EXTENT OF DAMAGE: VERY MINOR, MINOR, MINOR/MOD, MODERATE, MOD/SEVERE, SEVERE, VERY SEVERE, OTHER PROPERTY, NO DAMAGE, UNKNOWN
 AIR BAG SWITCH: ON, OFF, NOT PRESENT
 ESTIMATED TRAVEL SPEED: BETWEEN _____ MPH

COMMERCIAL VEH: HAZ. CARGO: HAZ. CARGO SPILL: HAZ. CARGO CODE: TYPE CARGO/COMMODITY: HAZ. SAFETY REPORT #
 SINGLE: NO. AXLES: NO. TRAILERS: US DOT # DOT MC #
 COMBINATION: BOAT: OWNER TOTAL: MOTOR CARRIER NAME:

MOTOR CARRIER ADDRESS: DRIVER: LOG BOOK: CLAIMS: SIDE OF VEHICLE: SINGLE STATE REGISTRATION:

VIOLATION CODES: CITATION NO. VEH: CASE NUMBER: SUSPECTED DRIVER: DATE: **APR 25 2002** VIOLATION TEST: PAS: OTHER:

TEST OFFERED: CHEMICAL TEST: BLOOD: URINE: BREATH: PERIOD: ALCOHOL: DRUGS: TESTED FOR: TAKEN BY: SENT TO: RESULTS: PAGE OF PAGES: **3 3**



MASTER FILE #: **00861610**

NCSP FM-20075-45432
 G300 Printed in U.S.A.
 MSP 74 Revised 1/2010



Kentucky Farm Bureau Insurance Companies

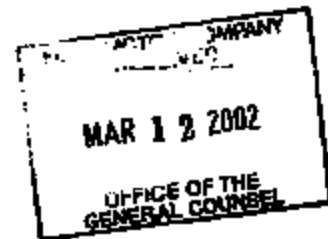
Kentucky Farm Bureau Mutual Insurance Company • The FB Insurance Company

3271 Rockriegel Parkway • P.O. Box 59595 • Jeffersonville, Kentucky 40269-0595
Telephone (502) 266-6100 • FAX (502) 266-6104

March 6, 2002

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

Re: Our Insured: [REDACTED]
Date of Loss: [REDACTED]
Our Claim No.: [REDACTED]



To Whom It May Concern:

Our investigation of the above noted accident reveals that your insured is responsible for our insured's damages.

As a result of this accident, we have been called upon to make payment under our insured's policy. Our payments are summarized below.

We respectfully request payment within 30 days or we will be forced to turn this subrogation file over to our Legal Unit.

Sincerely,

D. Olson
David Olson
Senior Adjuster

DO/nt ✓

Damaged Party	Comprehensive	Deductible	Total
Howard Brogan	\$25,480.00	\$500.00	\$25,980.00



Kentucky Farm Bureau Insurance Companies

Kentucky Farm Bureau Mutual Insurance Company • The FB Insurance Company

3271 Ruckriegel Parkway • P.O. Box 99595 • Jeffersonville, Kentucky 40269-0595
Telephone (502) 266-6100 • FAX (502) 266-6104

Register Maintain Finance Loss List Lists Summary Setup Options

```

WB3A OU                KFB - Claim Payment Detail
LOU L3DA NRT1524                MAR 06 2002 12:51:58 PM
Loss Occurrence. 00870694  Ins [REDACTED]                COV 04
Claimant..... 0001858804 [REDACTED]
Claim..... 0001193175  Payment Status. 02 APPROVED                NORMAL
Payee..... 0003541071  HNB AUTO EXCHANGE
Other Payee. N
Txn Type.... 28  FINAL PAYT  Payment Mode M MAN CHECK  Billing Code
Txn Code.... 30  LOSS PYMT  Check No.... 02165180  Account No...
Txn Sub Code  Taxable Flag N  Payment Date FEB 14 2002
EFT Authority  Honored Date FEB 27 2002
Gross Amount..... 25,480.00  Reserve Balance 0.00
Withholding Amount  Country Code... USA USA
Net Amount..... 25,480.00  Bank Account... CLAIMS
Description. TOTAL LOSS 2001 EXPLORER LEASE  Current Batch.
                D BY HOWARD BROGAN # 10-0005  Original Batch 4033419
Provider....  Document No... A6894138
New Status.. 02 APPROVED  Originator EYD1773  Approver..... EYD1773
Select. ___ +  Tax Id Number _____

```

COMMAND

PF01=Help PF02=PFkeys PF03=Return PF04=Prompt PF05=Refresh PF06=Top PF07=Backwa



KENTUCKY FIRE BUREAU INSURANCE COMPANIES AUTO INSPECTION REPORT

LOSS OCCURRENCE 870694 INSURED [REDACTED] DATE 2.12.02
 OWNER [REDACTED] PHONE [REDACTED]
 OWNER ADDRESS [REDACTED] LOCATION OF VEHICLE KY/IANA H69043
 TYPE CLAIM COLLISION COMP PD DEDUCTIBLE \$ 500
 LIENHOLDER HUNTINGTON LT INSPECTED BY RICK S

VEHICLE INFORMATION

YEAR 2001 MAKE FORD MODEL EXPLORER VIN # [REDACTED]
 LICENSE [REDACTED] ENGINE V6 MILEAGE ? FUEL TYPE GAS

CONDITION

TIRES 60 EXTERIOR 60 INTERIOR 69

ACCESSORIES OR DEDUCTIONS

AIR CONDITIONING \$ _____ PWR SEATS \$ 200 TLT \$ _____
 AM/FM STEREO TAPE \$ _____ PWR WINDOWS \$ _____ OLD DAMAGE \$ _____
 CRUISE \$ _____ REAR DEFOGGER \$ _____ CD PLAYER 150
 CUSTOM WHEELS \$ 300 ROLLING WINDOW \$ _____ LTR SPTS 450
 4 WHEEL DRIVE \$ INC STD TRANSMISSION \$ _____ TRAC 7 997 125
 PWR LOCKS \$ _____ SUN ROOF \$ 650 _____
 TOTAL OPTIONS \$ _____

PURCHASE PRICE _____ BOOK VALUE 22,275 MARKET VALUE _____ TAXES _____
 BASIC BOOK \$ _____

TAX FACTOR X .05 _____
 USE TAX \$ _____

SETTLEMENT

VALUE \$ 22,275
 OPTIONS + \$ 1,275
 (HIGH/LOW) MILEAGE + \$ 350
 TAXES + \$ 1470
 TRANSFERS + \$ 10
 TOTAL = \$ 25,980
 DEDUCTIBLE - \$ 500
 PAID \$ 25,480

SALVAGE DISPOSITION

SYSTEM REGISTER: YES NO CONTRACT: YES NO BUYER: KY/IANA H69043

DEALER

4/11 30

TS
no.

U77 EXPLORER SPORT TRAC 4X4
2001 MODEL YEAR
TS SILVER FROST METALLIC C/C
UT DRK GRAPHT SPORT BKT W/LEATHER
99E 4.0L SOHC V6 ENGINE
44D 5-SPEED AUTOMATIC D/D TRANS
XD2 4.10 LIMITED SLIP AXLE
581 AM/FM STEREO/IN DASH 6-DISC CD
916 AUDIOPHILE RADIO SYSTEM
153 FRONT LICENSE PLATE BRACKET
439 POWER MOONROOF
47P PREMIUM SPORT GROUP
.P255/70R16 A/T OWL TIRES
.STEP BAR
.FRONT TOW HOOKS
.FOG LAMPS
.WHEELS, 16" CAST ALUMINUM
553 CONVENIENCE GROUP
.SPD CONTROL/LEATHER TILT WHL
.AUTOLOCK/RELOCK
.REMOTE KEYLESS ENTRY W/KEYPAD
60B LEATHER COMFORT GROUP
.FRONT OVERHEAD CONSOLE
.FLOOR CONSOLE
.POWER DRIVER SEAT 6-WAY
63E CARGO CAGE
U LEATHER L/B BUCKET SEATS
TOTAL VEHICLE & OPTIONS
DESTINATION & DELIVERY
SCHEDULE A (MEMO) .00

EFTEngineering and Fire
Investigations3150 Carter Drive
Suite 301
Lexington, KY 40517
877-271-8486
Tel: 859-245-6466
Fax: 859-245-7168
www.efiinc.com**PRIVILEGED AND CONFIDENTIAL****ENGINEERING REPORT****FEBRUARY 28, 2002****PREPARED FOR:** KENTUCKY FARM BUREAU
P.O. BOX 99595
LOUISVILLE, KENTUCKY 40269**ATTENTION:** MR. DAVID OLSON**INSURED:** [REDACTED]**DATE OF LOSS:** FEBRUARY 3, 2002**INSPECTION
LOCATION:** KENTUCKIANA AUTO STORAGE POOL
LOUISVILLE, KENTUCKY**CLAIM NUMBER:** [REDACTED]**EFT FILE NUMBER:** 94506-20032**THIS REPORT IS FURNISHED AS PRIVILEGED AND CONFIDENTIAL TO THE
ADDRESSEE. RELEASE TO ANY COMPANY, CONCERN OR INDIVIDUAL IS
THE SOLE RESPONSIBILITY OF THE ADDRESSEE.**

INTRODUCTION

On February 3, 2002, a 2001 Ford Explorer SportTrac 4x4 owned by the insured [REDACTED] of LaGrange, Kentucky, caught fire while the insured was driving the vehicle along I-71 in Oldham County, Kentucky.

On February 5, 2002, Mr. David Olson, of Kentucky Farm Bureau Insurance Company, contacted Engineering and Fire Investigations, Inc. (EFI) and requested EFI's assistance in determining the origin and cause of the fire.

On February 5, 2002, the author of this report, Scott Jones, P.E., C.F.E.I., EFI Mechanical Engineer, (877) 271-8486, was assigned to conduct the investigation. The observations and the conclusions from the investigation are contained in this report.

BACKGROUND***Interview with [REDACTED] Insured***

On February 5, 2002, the author of this report interviewed [REDACTED] to learn his observations with regard to the events before and during the fire.

[REDACTED] was driving the subject vehicle at highway speed on I-71 in Oldham County, Kentucky, when he noted erratic operation of the engine tachometer. The tachometer would drop to zero and then suddenly rise to proper engine speed. Soon thereafter, the engine started making "dying noises," so [REDACTED] reportedly pulled off the highway onto the shoulder.

After stopping with the engine operating, [REDACTED] reportedly noted smoke emanating from underneath the engine. He immediately entered the passenger compartment and stopped the engine. By the time that he again exited the vehicle, fire had emanated from beneath the engine. Authorities were alerted of the event.

First responders reportedly arrived approximately 30 minutes after notification. The vehicle was completely involved by fire at the time of their arrival.

[REDACTED] reported that the vehicle had 12,000 to 13,000 miles at the time of the loss. The vehicle reportedly had minor service performed two times at the LaGrange, Kentucky, Wal-Mart. [REDACTED] believed that Wal-Mart had changed the oil during both service events, and the last service event was approximately 3,000 miles prior to the fire.

Mr. Brogan did not note unusual odors or performance anomalies at any time prior to the event. He reported the VIN as 1FMZU77E51 [REDACTED]

CLAIM NO. [REDACTED]

OBSERVATIONS

On February 6, 2002, the author of this report traveled to the Kentuckiana Auto Storage Pool (KASP) at 4420 Poplar Level Road in Louisville, Kentucky, to perform the inspection of the subject vehicle. The vehicle, which was listed as KASP stock number H68315 (*Photograph 1*), was located in the secured back lot at KASP. The vehicle was identified with Kentucky license plate [REDACTED] (*Photograph 2*), and the dashboard VIN plate (*Photograph 3*) was melted in the event.

The entire vehicle was extensively damaged due to the extended burn duration. *Photographs 4 and 5* show front and rear views of the vehicle, respectively. *Photographs 6 and 7* show the passenger's and driver's sides of the vehicle, respectively. *Photograph 13* shows the frame rails lying beneath the rear truck bed region.

Nearly all elastomer, zinc, and aluminum components inside the passenger's compartment were consumed or melted in the fire. *Photographs 8 and 9* show the dashboard region. *Photograph 10* shows a melted termination to a dashboard wiring harness. *Photograph 11* shows a one-gallon metal container discovered in the front seat region. *Photograph 12* shows the remnants of the rear seat region.

Engine Compartment Inspection

The top surface of the engine compartment hood is shown in *Photograph 14*. The lower hood support structure, which was still connected to its hinges, is shown in *Photograph 15*. *Photograph 16* shows the extensive damage to the engine and associated systems. All elastomer materials in the engine compartment were consumed in the fire.

Photograph 17 shows a forward looking aft view of the engine brake booster and the remnants of the engine compartment fuse and relay box. Reference *Photograph 39* for a view of an exemplar fuse and relay box mounted in a 2002 Ford Explorer Sport Trac (*Photograph 37*).

Photograph 18 shows a view of the extent of damage to the passenger's side of the engine. The remnants of the lug connections to the battery were discovered (*Photograph 19*). No battery remnants were discovered.

The engine compartment fuse and relay box remnants (*Photograph 21*) were unbolted from the fender to reveal the firewall interface connector for various power and signal conductors (*Photograph 22*). The author inspected individual conductors in and around both the fuse and relay box and the firewall interface region and found no indication of inadvertent conductor-to-conductor or conductor-to-ground shorting.

The author conducted an extensive tactile and visual inspection of the large gage stranded conductors from the engine starter and starter solenoid to the battery lugs. There were no indications of conductor-to-conductor shorting or conductor-to-ground shorting along the conductors.

The author conducted an extensive tactile and visual inspection of the stranded conductors from the engine alternator to the fuse and relay box region. *In the area of an engine-mounted harness support (Photograph 23) located at the front end of the driver's side upper control arm, both the alternator output conductor and the alternator field conductor had indications of conductor-to-ground shorting.*

Photograph 24 shows arcing and melting damage on a conductor, believed to be the alternator field conductor. (Author's Note: The alternator was completely destroyed during the fire. The subject conductor entered the region where the alternator had been located.) Photographs 25 and 26 show detailed views of the fused conductor strands after the region was cleaned using a soft brass brush.

The associated engine-mounted harness support was inspected for indications of arcing. As shown in *Photographs 27 through 29*, arcing and copper transfer was discovered along one of the top edges of the stamped steel harness support bracket.

The alternator output conductor was also discovered melted (*Photographs 30 and 31*) at the location of the subject harness support bracket. The end of the conductor had separated by tensile forces as shown in the photograph. The strands appeared to have been abnormally squeezed together just prior to the separation (*Photograph 31*).

The author inspected the harness support on an exemplar 2002 Ford Explorer Sport Trac and discovered the configuration shown in *Photograph 38*. The battery and alternator conductors traveled along the upper surface of the support bracket inside a corrugated plastic chafe guard.

The author removed a sample of the chafe guard from a 2000 Ford Explorer located adjacent to the subject vehicle at KASP (*Photograph 35*). To test the flammability characteristics of the chafe guard, the author held a cigarette lighter to the end of the sample. The chafe guard immediately caught fire and supported the flame (*Photograph 36*) until the entire sample was consumed.

Melted copper from an unidentified conductor or fitting was discovered on the steel discharge tube from the air conditioning compressor as shown in *Photographs 32 through 34*.

DISCUSSION/CONCLUSIONS

The author conducted a visual inspection of the conductors located in the passenger's compartment of the subject vehicle. Due to the duration and intensity of the fire, many of the copper conductors had separated and melted. As the witness report held that the first indication of smoke was from below the engine, the passenger's compartment wiring was not suspected of causation in the fire.

The author conducted an extensive inspection of the small gage stranded conductors located in and around the engine compartment fuse and relay box and the firewall interface to the passenger's compartment. There were no indications of conductor-to-conductor

shorting or conductor-to-ground shorting. It is not believed that the small gage conductors had causation in the event.

The author conducted an extensive visual and tactile inspection of the large gage conductors leading to the engine starter and starter solenoid. There were no indications of conductor-to-conductor shorting or conductor-to-ground shorting. It is not believed that the starter conductors had causation in the event.

The author conducted an extensive inspection of the alternator field and output conductors. The alternator field conductor strands were melted together for approximately 3 inches at the location of an engine-mounted harness support bracket and showed indications of extensive electrical arcing with the bracket. The conductor and bracket are shown in *Figure 1* below, which was created from *Photograph 27*.



Figure 1 - ARCING LOCATION BETWEEN ALTERNATOR FIELD CONDUCTOR (LEFT) AND SUPPORT BRACKET (RIGHT)

It is believed that the following sequence occurred:

- While the insured was driving the vehicle, the alternator field conductor came into contact with the associated support bracket and intermittently arced to the bracket. It should be noted that the support bracket had sharp edges facing the harness containing the conductor.
- The insured noted the event by erratic operation of the electrically driven engine tachometer and the "dying sounds" as the engine's primary electrical system was intermittently grounding. The insured pulled off the highway.
- As the arcing continued with the engine running, the arcing served as the ignition source for the surrounding conductor (PVC) insulation, which was the first fuel to

the fire. The fire rapidly spread into the highly combustible corrugated plastic chafe guard surrounding the harness conductors.

- The fuel hose, with no flame-resistant sheathing, passed approximately three inches above the harness region, which caused eventual failure of the hose and extension of the fire to underneath the engine.
- The insured's first observation of fire beneath the engine was most probably flaming gasoline from the failed fuel hose that was ignited from the conductor insulation and chafe guard fire immediately below the fuel hose.

It should be noted that the author discovered the alternator output conductor, which was contained in the same harness as the field conductor, extensively melted and physically deformed by the harness support and/or installation process.

It is believed that the Ford Motor Company is directly responsible for the fire due to the following design and assembly practices:

1. The alternator output conductor was abnormally deformed in the vicinity of the harness support bracket due to poor installation practice.
2. The subject harness support bracket had sharp upper edges exposed to the associated harness. It is good design practice to break the edges (i.e., provide 0.015 inch radius by tumbling or other means).
3. The fuel hose did not appear to have a flame resistant sleeve installed along its length in the engine compartment. It is good design practice to have silicon rubber sleeve around a flammable fluid hose to avoid the extension of an otherwise isolated fire.
4. It is very poor design practice to use a highly flammable chafe guard to protect cables that are otherwise flame retardant.

The discussion and conclusions are based upon information reviewed to date, plus general engineering knowledge and experience. Information reviewed at a later date may warrant modifying or augmenting the conclusions.

We appreciate the opportunity to work with you on this evaluation. Pending further direction, this file is considered closed. Please let us know whether we can be of further assistance to you.

Sincerely,

Engineering and Fire Investigations

Scott A. Jones, P.E., C.F.E.I.
Mechanical Engineer
(812) 945-3820

LaGrange Fire & Rescue Department -- Fire Alarm Report

INCIDENT LOCATION: 393 @ 18 571 N ENTRANCE					STATION NUMBER: 1		
DATE	RUN NUMBER	IN-TIME	ON-SCENE	AVAILABLE	INCIDENT BOX NUMBER		
2/3/02	01-139	12:27	12:53	13:25			
NATURE OF CALL: VEHICLE FIRE							
OWNER: [REDACTED]				PHONE NUMBER: [REDACTED]			
OWNERS ADDRESS: [REDACTED], Campbellburg KY							
OCCUPANT NAME:				PHONE NUMBER: ()			
OCCUPANCY TYPE:				NUMBER OF STORIES: ()			
SITUATION FOUND: Car fire				INCIDENT COMMAND: HSC1			
<p style="text-align: center;"><u>Extinguishment - fully involved</u> <u>ACTION TAKEN</u></p>							
COMPANY RESPONSE:		INJURIES:		FATALITIES:			
01 [x]	33 []	NO INJURIES	[]	NO FATALITIES []			
02 []	41 []	FIRE SERVICE	[]	FIRE SERVICE []			
03 []	51 []	CIVILIAN	[]	CIVILIAN []			
04 []	61 [x]	TOTAL NUMBER:		TOTAL NUMBER:			
05 []	62 []	POSSIBLE CAUSE OR DETERMINATION: Possible transmission overheat or fluid leak -		NUMBER OF ALARMS: 01 [x] 04 [] 02 [] 05 [] 03 [] 06 []			
06 []	63 []						
07 []	71 []						
08 []	72 []						
21 []	73 []						
31 []							
32 []							
VEHICLE ONE INFORMATION				VEHICLE TWO INFORMATION			
MAKE: Ford				MAKE:			
MODEL: Sport-Trac				MODEL:			
VEHICLE YEAR:		COLOR:		VEHICLE YEAR:		COLOR:	
LICENSE NUMBER: 921R HG		STATE: KY		LICENSE NUMBER:		STATE:	
VIN NUMBER:				VIN NUMBER:			
OWNERS NAME:				OWNERS NAME:			
OWNERS ADDRESS: Above				OWNERS ADDRESS:			
HOSE LINES USED				HOSE LINES USED			
Size	Type	From	To	Size	Type	From	To
1 3/4	Attack	4531	Fire				
SIGNATURE OF PERSON MAKING OUT REPORT: A. Hillebra							

Personnel On Apparatus

ENGINE 4531	ENGINE 4532	ENGINE 4533
OFFICER: <i>Smith</i>	OFFICER:	OFFICER:
ENGINEER: <i>Hillebrandt</i>	ENGINEER:	ENGINEER:
1ST LINE: <i>Bussard</i>	1ST LINE:	1ST LINE:
2ND LINE: <i>MASON</i>	2ND LINE:	2ND LINE:
UTILITY: <i>Rowland</i>	UTILITY:	UTILITY:
CREW: <i>GREGORY</i>	CREW:	CREW:
QUINT 4551	QUINT 4551	ENGINE 4521
OFFICER:	OFFICER:	OFFICER:
ENGINEER:	ENGINEER:	ENGINEER:
1ST LINE:	1ST LINE:	CREW:
2ND LINE:	2ND LINE:	UTILITY 4581
UTILITY:	UTILITY:	DRIVER:
CREW:	CREW:	CREW:
TANKER 4581	TANKER 4582	TANKER 4583
ENGINEER: <i>Bryant</i>	ENGINEER:	ENGINEER:
CREW: <i>Williams</i>	CREW:	CREW:
FIELD UNIT 4571	FIELD UNIT 4572	FIELD UNIT 4573
ENGINEER:	ENGINEER:	ENGINEER:
CREW:	CREW:	CREW:
PERSONNEL AT STATION		PERSONNEL AT STATION
<i>Kevin Thompson</i>		
<i>Donna Williams</i>		
COMMENTS & REMARKS		

KENTUCKY UNIFORM POLICE TRAFFIC COLLISION REPORT

DRAFT

INVESTIGATING AGENCY: **OLDHAM COUNTY POLICE** AGENCY OR NUMBER: **KY0930400** LOCAL CODE: **C2002301**

ROADWAY NAME: **I 71** MILEPOST: **13** # LANE(S) INVOLVED: **2** LANE: **FLN** ONE WAY: **3** SPEED LIMIT: **65**

IN CITY LIMITS? MILES FROM CITY: **1** CITY/TOWN: **BUCKNER**

LATITUDE: **38° 22' 54.7"** LONGITUDE: **85° 25' 6.18"**

COLLISION DATE: **02/20/02** COLLISION TIME: **12:30**

NUMBER OF COLLISION: ANGLE BACKING HEAD ON OPPOSING LEFT TURN REAR END REAR TO REAR

LOCATION 1ST EVENT: SCENE MEDIAN ON ROADWAY OUTSIDE SHOULDER, LEFT OUTSIDE SHOULDER, RIGHT SHOULDER

TRAFFIC CONTROL: ADVISORY SPEED SIGN CENTER LINE CURVE SIGN FLASHING LIGHT MEDIAN

ROADWAY TYPE: COUNTY ROAD FEDERAL FRENCHMAN ROAD INTERSTATE LOCAL STREET

TOTAL LANES: 2 3 4

ROADWAY CHARACTER: CURVE & GRADE CURVE & HILLCREST CURVE & LEVEL

WEATHER: BLUING SAND, SOX, DIRT, SNOW CLEAR CLOUDY FOG/SMOG/SMOKE FOG WITH RAIN

LIGHT CONDITION: DAWN DAYLIGHT DARK

LAND USE: BUSINESS INDUSTRIAL LIMITED ACCESS PARK PRIVATE PROPERTY RESIDENTIAL

EMERGENCY AGENCY AND FILE #

EMERGENCY AGENCY AND FILE #

EMERGENCY AGENCY AND FILE #

EMERGENCY AGENCY AND FILE #

EMERGENCY AGENCY AND FILE #

EMERGENCY AGENCY AND FILE #

RETURNED OR DISCARDED REMOVED BY: FEDERAL NONDISCRETIONARY VEHICLE HELICOPTER/OTHER AIR VEHICLE

DESCRIPTION OF COLLISION: **Driver stated He was traveling north on I-71 when He felt His vehicle Jerking. He stopped and raised the Hood and the engine was already on fire.**

CLAIM 13

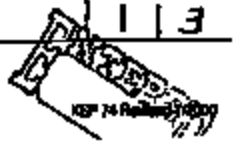
FEB 25 2002

SAF. COMP. PHOTOGRAPHER UNIT NO.

INVESTIGATOR: **L.B. SIMPSON** LIC. NUMBER: **311/3006** RES. OR POST NO.: **0413** TIME NOTIFIED: **1235** TIME ARRIVED: **1235** TIME DEPARTED: **1314** NUMBER OF PAGES: **1 | 3**



MASTER FILE #: **00866610**



LOG# CODE

C2002301

1 PROPERTY DAMAGE-OTHER THAN VEHICLES

PROPERTY

1 2 3 4 5

OWNER/ADDRESS

2 PROPERTY DAMAGE-OTHER THAN VEHICLES

PROPERTY

1 2 3 4 5

OWNER/ADDRESS

3 PROPERTY DAMAGE-OTHER THAN VEHICLES

PROPERTY

1 2 3 4 5

OWNER/ADDRESS

DIAGRAM
Indicate North by Arrow

CLAIM 13
FEB 25 2002

PAGE OF PAGES

2 : 3



MASTER FILE #: 00861610

ESP 24 Revised 1/2000

ER05-005-LC1-4520

LOCAL CODE
C2002301

1 OPERATOR'S LIC. NO. **BARRECKMAN'S**
895-097-907
STATE **KY**
COMP GO. RESIDENT
COL OWNER

- PEDESTRIAN FACTORS**
- APPROXIMATING OR LEAVING VEHICLE
 - AT INTERSECTION
 - CROSSING AGAINST SIGNAL
 - CROSSING WITH SIGNAL
 - DARK CLOTHING/NOT VISIBLE
 - DARTING INTO ROAD
 - DRIVING
 - DRUG RELATED
 - GETTING ON/OFF VEHICLE
 - IN CROSSWALK
 - JOGGING
- LYING IN ROADWAY**
- NOT AT INTERSECTION
 - NOT IN ROADWAY
 - PHYSICAL IMPEDIMENT
 - PLAYING IN ROADWAY
 - PUSHING VEHICLE
 - SLEEPING/NOT AWAKE
 - WALKING IN ROADWAY
 - WORKING IN ROADWAY
 - WORKING ON VEHICLE

OPERATOR LAST NAME **[REDACTED]** FIRST NAME **S.** CITY **CAMPBELLBURG** STATE **KY** ZIP CODE **[REDACTED]**

INVOLVED PERSONS: NAME, ADDRESS, CITY, STATE AND ZIP	DATE OF BIRTH DATE OF DEATH	15	16	17	18	19	20	21	22	23
NAME operator	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
ADDRESS										
NAME										
ADDRESS										
NAME										
ADDRESS										
NAME										
ADDRESS										
NAME										
ADDRESS										

VEHICLE YEAR MAKE MODEL TYPE STATE REGISTRATION NUMBER YEAR
2001 Ford SPORT TRAC LL KY [REDACTED] 2002

VEHICLE ID. NUMBER **1FA2U77E51L [REDACTED]** NAME OF INSURANCE CO. **KY FARM BUREAU** COLOR OF VEHICLE **SILVER**

EXTENT OF DAMAGE

VERY MINOR SEVERE
 MINOR VERY SEVERE
 MINOR/NO OTHER PROPERTY
 MODERATE NO DAMAGE
 MOD/SEVERE UNKNOWN

AIR BAG SWITCH
 ON NOT PRESENT
 OFF

TRAVEL DIRECTION

ESTIMATED TRAVEL SPEED
 BETWEEN _____ & _____ MPH

COMMERCIAL VEH. HAZ. CARGO/SPILL HAZ. CARGO CODE TYPE CARGO/COMMUNITY HAZ. SAFETY REPORT #

MOTOR CARRIER ADDRESS **[REDACTED]** CARRIER NAME SOURCE DRIVER EMPLOYEES LESSEE

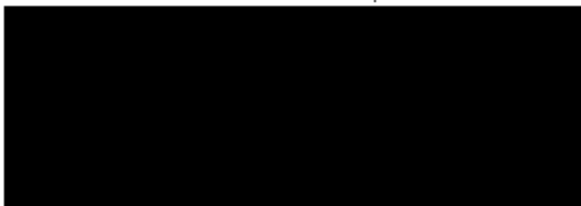
VIOLATION CODES **[REDACTED]** SECTION NUMBER **[REDACTED]** CASE NUMBER **[REDACTED]** SUSPECTED DRIVER **[REDACTED]** METHOD OF DETERMINATION FIELD SOBRIETY TEST P.I.L. OTHER

TEST OFFERED CHEMICAL TEST: BLOOD URINE BREATH RESTED FOR: ALCOHOL DRUGS TAKEN BY **[REDACTED]** SENT TO **[REDACTED]** RESULTS **[REDACTED]** PAGE OF PAGES **3 3**

MASTER FILE #: **00861610**

NCP 284-2876-0000
©2001 Printed in U.S.A.
NCP 74 Revised 12/00





Plaintiff,

VERIFIED COMPLAINT

-vs-

INDEX NO. I 2001-8610

FORD MOTOR CORPORATION,

Defendant.

The plaintiff, above named, by its attorneys, REGAN & REGAN, LAWRENCE J. REGAN, ESQ., of counsel, as and for its Verified Complaint against the defendant alleges as follows:

1. That at all times herein mentioned, the plaintiff was a foreign corporation authorized and licensed to do business within the State of New York having offices for the transaction of business in the Town of Amherst, County of Erie and State of New York.
2. That at all times herein mentioned, the plaintiff was a property casualty insurer and at all times herein mentioned issued to members of the general public policies of insurance for, among other things, damage to motor vehicles.
3. That at all times herein mentioned, the plaintiff had a policy of insurance in effect for its insureds, [REDACTED] who had an insurable interest in a certain 2000 Ford Explorer, Vehicle Identification Number IFMZU73E2Y [REDACTED]
4. That at all times herein mentioned, the defendant, Ford Motor Corporation, was a foreign corporation authorized and licensed to do business within the

State of New York having offices for the transaction of business throughout the State of New York.

5. That at all times herein mentioned, the defendant was the manufacturer, distributor and seller of the aforementioned 2000 Ford Explorer motor vehicle.

6. That on or about the 9th day of June, 2001, an engine compartment fire erupted in the aforementioned motor vehicle.

7. That as a result of the aforementioned fire, plaintiff's insureds sustained a property loss in the amount of twenty-three thousand six hundred fifteen dollars and eighteen cents (\$23,615.18).

8. That by virtue of its policy of insurance with its insureds, the plaintiff paid the entire loss in the amount of twenty-three thousand six hundred fifteen dollars and eighteen cents (\$23,615.18).

9. That by virtue of the foregoing, the plaintiff has become subrogated to the rights of its insureds.

10. That the aforementioned fire and resultant property loss occurred solely through the negligence, carelessness and recklessness of the defendant as well as its agents, servants and/or employees.

**AS AND FOR A SECOND CAUSE OF ACTION
AGAINST THE DEFENDANT, PLAINTIFF ALLEGES:**

11. The plaintiff repeats and realleges each and every allegation contained in paragraphs numbered "1" through "10" above as is specifically set forth herein.

12. That upon information and belief, the aforesaid 2000 Ford Explorer motor vehicle was defectively manufactured, designed, and/or assembled and was in a defective

and hazardous condition when the defendant placed the subject motor vehicle in the stream of commerce.

13. That the incident herein before described and the resultant property damage was caused as a result of the defective and hazardous condition of said motor vehicle and the plaintiff claims damages against the defendant under the Doctrine of Strict Products Liability.

14. That as a result of the foregoing, the plaintiff has been damaged in the sum of twenty-three thousand six hundred fifteen dollars and eighteen cents (\$23,615.18) and demands judgment therefor.

**AS AND FOR A THIRD CAUSE OF ACTION
AGAINST THE DEFENDANT, PLAINTIFF ALLEGES:**

15. Plaintiff repeats and realleges each and every allegation set out in paragraphs "1" through "14" above as if specifically set forth herein.

16. That in connection with the lease of the aforesaid 2000 Ford Explorer to the plaintiff's insureds, the defendant expressly and impliedly represented and warranted that the motor vehicle was fit, merchantable, and safe for the use for which it was intended, was properly designed and manufactured, was free from defects and that all material disclosures and warnings necessary for the proper and safe use of the motor vehicle were, in fact, being made.

17. That the defendant breached the aforesaid express and implied representations and warranties as aforesaid in that the subject 2000 Ford Explorer was not free from defects.


18. That as a result of the breach of said warranties and representations,

the plaintiff has been damaged in the amount of twenty-three thousand six hundred fifteen dollars and eighteen cents (\$23,615.18) and demands judgment therefor.

WHEREFORE, plaintiff demands judgment against the defendant in the amount of twenty-three thousand six hundred fifteen dollars and eighteen cents (\$23,615.18), together with statutory interest at the rate of nine percent (9%) per annum from the 9th day of June, 2001, plus the costs and disbursements of this action.

DATED: September 19, 2001
Buffalo, New York

Yours, etc.



REGAN & REGAN
LAWRENCE J. REGAN, ESQ.
Attorneys for Plaintiff
Office and P.O. Address
424 Main Street, Suite 1220
Buffalo, New York 14202
(716) 854-1652

ATTORNEY'S AFFIRMATION

STATE OF NEW YORK)
COUNTY OF ERIE) ss.:
CITY OF BUFFALO)

The undersigned, an attorney admitted to practice in the courts of New York State, shows: that deponent is Lawrence J. Regan, Esq., the attorney of record for One Beacon Insurance, as subrogee of [REDACTED] in the within action; that deponent has read the foregoing Complaint and knows the contents thereof; that the same is true to deponent's own knowledge, except as to the matters therein stated to be alleged on information and belief, and that as to those matters, deponent believes it to be true.

Deponent further says that the reason this verification is made by deponent and not by plaintiff is that plaintiff is a foreign corporation.

The grounds of deponent's belief as to all matters not stated upon deponent's knowledge are information contained in the file and knowledge of the file.

The undersigned affirms that the foregoing statements are true, under penalties or perjury.

DATED: 09/19/01




LAWRENCE J. REGAN, ESQ.

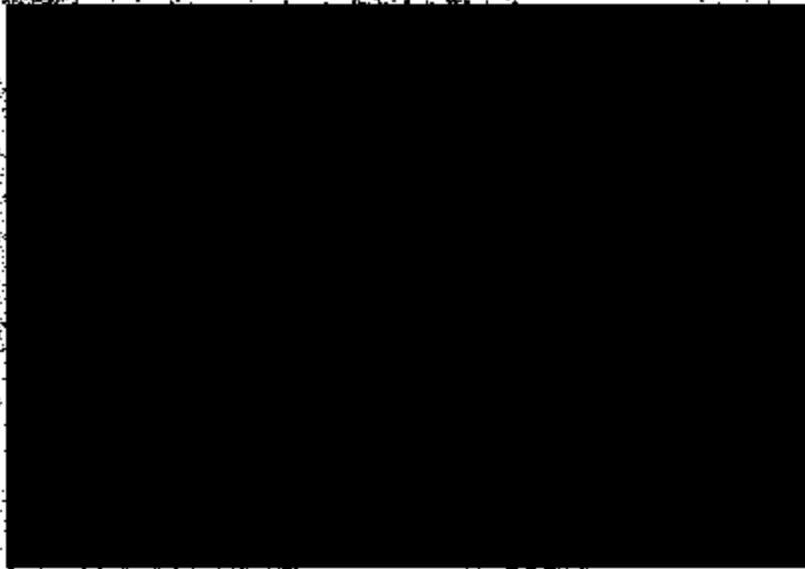
1 INCIDENT TYPE Vehicle Fire				2 CLASSIFICATION (SEE POLICE/CHIEF REPORT)				3 ON 072229	
4 TIME OF OCCURRENCE MO: 12 DAY: 01 YEAR: 03			5 TIME OF REPORT MO: 12 DAY: 01 YEAR: 03			6 LOCATION (HOUSE NO., STREET NAME, CITY, STATE, ZIP) 15 W. Park-Henrietta Rd. Henrietta, NY 14750			7 SEC 8
8 PERSONS INVOLVED ENTER APPROPRIATE CODES FOR EACH AND USE NARRATIVE IF REQUIRED W-1. WITNESS BY HIS ADDRESS IF R. REPORTING PERSON NOT INTERVIEWED. NO INFORMATION									
NAME (Last, First, Middle)				SEX		RACE		DOB	
ADDRESS (HOUSE NO., STREET CITY ST)						CITY		STATE	
9 NATURE OF INJURY						10 HOSPITALIZED (WHERE)			
11 NARRATIVE: DESCRIBE THE DETAILS OF THE INCIDENT LIST MISSING PERSON DESCRIPTION USE APPROPRIATE NUMBER CODE TO EXPAND ON ABOVE INFORMATION									
<p>12 ATTENDED TO THE AREA OF PARK IS W. PARK-HENRIETTA TOWNHIP RD. FOR THE REPORTED VEHICLE FIRE. A FEW MINUTES LATER FIRE DEPT. ARRIVED AT THE END OF PARK-HENRIETTA RD. WENT TO THE INCIDENT - IN THE AREA. THE CAR WAS BURNING BY A FIRE CAUSED BY [REDACTED] FROM A COLLAPSE ("911-CR"). THE REPORTER [REDACTED] AND N.Y.S. ASSISTANT [REDACTED] ATTENDED TO [REDACTED] (N and I). THE VEHICLE WAS A 2002 Ford Explorer, VIN [REDACTED] [REDACTED] ARRIVED ON SCENE BEFORE OTHER PERSONS ARRIVED. HE WAS OBSERVING METALS AND OUT OF BURN. HE REPORTED THAT HE WAS NOT IN PARK-HENRIETTA RD. WENT TO BACK OF VEHICLE DISMOUNT. HE BEGAN TO SEARCH SURROUNDING AREA, CALLED THE POLICE TO THE SCENE, AND COVERED THE NEWS. WHEN HE DID SO, FLOODS START POURING FROM THE SKY. REPORTER PREVIOUS CALLED THE NEWS AND RAN TO VEHICLE DISMOUNT AND CALLED 911. HE COMPLAINED OF MOST TENDRONS TO HIS FACE AND WAS TREATED BY RAIN. REPORTER WAS REPORTED. POLICE TRANSPORTED HIM BACK TO VEHICLE DISMOUNT. DEPUTY JIM BROWN ASSISTED WITH FIRE INVESTIGATION. THE FIRE WAS CONSIDERED ACCIDENTAL. THE VEHICLE WAS TOWED FROM THE SCENE TO [REDACTED].</p>									
12. TECH WORK		13 FOLLOW-UP BY		DATE DUE		14. PROPERTY #		15. ZONE ORIGIN	
EYES <input type="checkbox"/> NO <input checked="" type="checkbox"/>		FILE							
16. REPORTING OFFICER (NAME)		17. ASSISTANT (NAME)		18. SUPERVISOR (NAME)		19. OFFICER (NAME)		20. OFFICER (NAME)	
ERIC [REDACTED], 4242		P. [REDACTED], 405A		[REDACTED]		[REDACTED]		[REDACTED]	

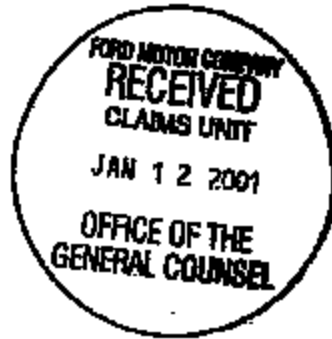
INCIDENT REPORT

DEPARTMENT

Marc G. [REDACTED]

Handwritten signature






Ford Motor Company
Office of General Council
Park Lane Towers West # 400
3 Park Lane Blvd
Dearborn, MI 48126

Dear Sirs,

This letter is in reference to a claim that The Hartford wishes to file for a possible defect causing fire to a vehicle that we insure. The [redacted] caught fire on [redacted] while running and unoccupied. Our insured, [redacted] contacted us and we are handling the claim but have left the vehicle at the residence for inspection into this matter. Please contact us within 14 days to discuss this matter, we will leave the vehicle at his residence for inspection by you or we can move it to a salvage yard if desired. I can be reached at 1-800-637-5410 extension 6966 between 9 AM and 6 PM Eastern Time. We will expect a reply within 14 days of receipt of this letter.

Sincerely,


Craig Dickinson
Total Loss Processor

(running + unoccupied)

- '00 Expl
- VIN
- 12/10/00

Southeast Personal Lines
Claims Service Center
2502 Rocky Point Drive
Suite 400
P.O. Box 30773
Tampa, FL 33630-3773
Telephone 813 286 8243
Toll Free 1 800 243 5868

FD-503-2
NORTH CAROLINA
ACCIDENT
REPORT

0000

County: [redacted] Zip: [redacted] Report No: 000119613

Station: [redacted] Fire: [redacted] VED
Mo: 12 Day: 10 Yr: 001 Day of Week: 1 Alarm Time: 16:55 Time Out: 17:00 Arr Time: 17:09 Time In: 17:15 Tot. Time Out: 04:15

ACCIDENT ADDRESS OR LOCATION:

Street: [redacted] Rtn. or Apt.:

FIRE SERVICE RESPONSE

Personnel: 10:06

OCCUPANT NAME

City: Holly Ridge State: NC

Engines: 10:01

OWNER NAME

Phone: [redacted] Mailed: [redacted]

Aerials: 0:00

OWNER ADDRESS

Phone: [redacted]

Towers: 0:00

City: Chmquapm State: NC

Other Vehicles: 10:01

Headlines: [redacted] [redacted]

PLEASE PUT APPROPRIATE CODE NUMBER IN BOX FOR EACH CATEGORY

- METHOD OF ALARM FROM PUBLIC
- 1 Telephone
 - 2 Municipal alarm system
 - 3 Private alarm system
 - 4 Radio
 - 5 Verbal
 - 6 Home of other
 - 7 Tie-line
 - 8 Voice signal fire alarm system
 - 9 Other

- TYPE OF SITUATION FOUND
- 11 Structure fire
 - 12 Any fire outside a structure where the material burning has a value
 - 13 Vehicle fire
 - 14 Trees, brush, grass fire
 - 15 Railway fire (material burning but no value)
 - 16 Explosion, no alternate
 - 17 Outside spill, leak, with fire

- 18 Fire explosion not classified
- 20 Overpressure rupture (no contribution)
- 30 Reactor
- 32 EMS only
- 40 Hazardous conditions
- 50 Service call
- 60 Good intent call
- 71 False malicious
- 73 False no function
- 74 False unintentional
- 95 Other situation found

- TYPE OF ACTION TAKEN
- 1 Extinguished
 - 2 Rescue
 - 3 Investigation
 - 4 Remove hazard
 - 5 Standby
 - 6 Salvage
 - 7 Medical Aid
 - 8 Fill, move up
 - 9 Cancelled enroute
 - 0 Water supply

REQUIRES COMPLETION OF INJURY & FACILITY REPORT

No incident-related injuries
Fire Inv. 10:00, 0:00

No incident-related fatalities
Fire Inv. 0:00, 0:00

Is anyone suspected in ignition?
 Yes No

Is property abandoned or vacant?
 Yes No

FIRE CAUSALITY

FIRE LOSS

FIRE

Fill in this section if "TYPE OF SITUATION FOUND" is 11, 12, 13, 16, 17, 19 ONLY (14, Optional) (Refer to coding sheet)

Alarm Factor: Mechanical 50 Area of Fire Origin: Engine Room 83

Fixed Property Use: Not Applicable 000

Equipment involved in ignition: Vehicle 96

Point of Heat of Ignition: Other 97 Type of Material Ignited: Flammable Cont. 20

Form of Material Ignited: Other not classified 90

If Heating Equipment Involved, Type of Fuel Used: 1 Gasoline, 2 LPG, 3 Electric, 4 Wood, 5 Coal, 6 Oil, 7 Natural Gas, 8 Gasoline, 9 Other, 0 Not App.

PROPERTY DAMAGE CLASSIFICATION: 4 Value, 4 Damaged

CONDITION UPON ARRIVAL: 1 Overheat, 2 Struck, 3 Open flame, 4 Out on arrival 3

Estimated Structure Damage: [redacted]

MOBILE PROPERTY TYPE: 11 Automobile, 12 Bus, 13 All-terrain vehicle, 14 Motor home, 15 Travel trailer, 16 Mobile home, 17 Mobile home

Estimated Contents Damage: [redacted]

Mobile Property: Yr: Ford, Make: Explorer, Model: [redacted], Serial Number/VIN: JFMZU6240V [redacted]

Equipment Involved in Ignition: Yr: [redacted], Make: [redacted], Model: [redacted], Serial Number: [redacted]

NO. OF STORIES: 1 Single story, 2 Two stories, 3 3 or 4, 4 5 or 6, 5 7 to 10, 6 11 to 20, 7 21 to 50, 8 Over 50, 9 Below grade

EXTENT OF DAMAGE: 1 Confined to the object of origin, 2 Confined to part of room or area of origin, 3 Confined to room of origin, 4 Confined to fire-rated comp. of origin, 5 Confined to floor of origin, 6 Confined to structure of origin, 7 Extended beyond structure of origin, 8 No damage of this type

DETECTOR PERFORMANCE: 1 Present, 2 Not Present

Present, Type of Control Unit: 1 Smoke, 2 Heat

Power Supply: 1 In room of fire, operated, 2 Not in room of fire, operated, 3 In room of fire, did not operate, 4 Not in room of fire, did not operate, 5 In room, fire too small to operate, 9 Not classified (Not App.)

Building Height: [redacted], Joint of Fire Origin: [redacted]

CONSTRUCTION TYPE: 1 Fire resistant, 2 Noncombustible, 3 Heavy timber, 4 Ordinary, 5 Frame, 6 Other

SPRINKLER PERFORMANCE: 1 Equipment operated, 2 Equipment in service, did not operate, 3 Equipment present, fire too small to operate, 4 No equipment present, 5 Equipment not in service

Fire Retained for Investigation to: Yes No

Officer in Charge (Name, position): Chief William E. Daniels Member Making Report: Chief William E. Daniels

Remarks: [redacted] SEE ATTACHMENT FOR MORE INFO

DEPARTMENT COPY



July 31, 2001

P

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

Claim Number: [REDACTED]
Insured Name: [REDACTED]
Date of Loss: 12/10/00
Amount of Loss: \$20,680.05
Location of Loss: HOLLY RIDGE NC
Our Account No: [REDACTED]
Third Party: Ford Motor Company
Your File Number:

437654

ce

Dear Mr. Norton:

Please find enclosed our subrogation demand with supports. Please review and respond to us accordingly regarding your company's position.

Sincerely,

Dolores Bonneau

Dolores Bonneau
Claims Service Specialist
1-800-824-1732 ext: 5138

*NO color photos
NO VEH*

Orlando Central Recovery Office
P.O. Box 946001
Maitland, FL 32794-6001
Facsimile 407 875 3908

Langham and Associates, Inc.

P.O. Box 1227

Morehead City, North Carolina 28557

STEVE W. LANGHAM, CFI
President

252/247-9254
FAX: 252/247-9258

INVESTIGATION REPORT

REPORT NUMBER One

PRIVILEGED AND CONFIDENTIAL

January 29, 2001

PREPARED FOR:

Hartford Insurance Company
P.O. Box 30773
Tampa, FL 33630-3773

ATTENTION:

Mr. Jeff Williams

INSURED:

[REDACTED]

DATE OF LOSS:

December 10, 2000

LOSS LOCATION:

Ottawa Ave-Holly Ridge, NC

POLICY NUMBER:

Unknown

CLAIM NUMBER:

[REDACTED]

FILE NUMBER:

A-00206-02

Case No. A-00206-02
Insured: [REDACTED]

- 2 -

January 29, 2001

ASSIGNMENT

I received this assignment on Thursday, December 28, 2000, from Mr. Jeff Williams of Hartford Insurance Company. Mr. Williams requested an examination to determine the origin and cause of the fire. My investigation commenced January 4, 2001.

SUMMARY OF CAUSE AND ORIGIN

This fire is accidental, resulting from the ignition of gasoline vapors due to a fuel system malfunction in the engine compartment. The following facts support this opinion: the concentrations of fire damage within the engine compartment; the degree of destruction at the fuel injection system and portions of the flexible fuel lines; indications from the operator of the vehicle smelling the odor of gasoline prior to the fire's occurrence; and the elimination of other potential sources of ignition.

EXAMINATION

I examined this vehicle at the home of a friend of the insured's in Holly Ridge, North Carolina on January 4, 2001. This vehicle is a 2000 Ford Explorer, with a Vehicle Identification Number of 1FMZU62XOYZ [REDACTED]. The Vehicle Identification Number was taken from the driver's side portion of the dashboard. The valid registration plate, [REDACTED] was present on the vehicle but due to fire damage, the safety inspection information, as well as the vehicle's mileage, could not be determined.

Exterior

With the exception of fire damage, the exterior of this vehicle was in like new condition, with no evidence of pre-fire or repaired body damage or outerbody panel rust through. The outerbody panels surrounding the engine compartment exhibited the heaviest degree of fire damage and it was obvious that the fire originated from within the engine compartment and spread into other portions of the vehicle from this area.

At the time of the fire, all four tires and wheels were present. At the time of my examination, all tires treads were matching and in like new condition and the rims were of factory origin.

Engine Compartment

This vehicle was powered by a 6-cylinder, fuel-injected, gasoline engine with power provided to the rear wheels through an automatic transmission. A visual inspection of the engine compartment indicated that all normally expected components were present and there was no visual indication that the vehicle was in an inoperable condition at the time of the loss. Fluid levels were normal with no evidence of leakage.

The vehicle's 12-volt battery was present in the engine compartment. Examination of the remains of the battery, the positive and negative battery terminals and the remains of the wiring

Insured: [REDACTED]

harness throughout the engine compartment showed varying degrees of heat exposure damage but no evidence of shorting, beading or fire-causing malfunction.

Many of the components for the fuel injection system, at the top of the engine, were completely melted away. Portions of the flexible fuel line, leading to the fuel injection, were intact; however, lower portions of the fuel line, as it comes closer to the frame on the driver's side and towards the firewall, had completely burned away. Due to the overall damage in the engine compartment, it is difficult to specify exactly what failed in the fuel system but all severe heat and intensity to the engine compartment was at the location of the fuel injection system.

Interior

At the time of the fire, all four doors were closed with windows in the raised position. All glass was destroyed by the fire. Fire damage on the interior consisted primarily of heavy heat damage toward the dashboard area and melting of the dash on the passenger side. This was due to the fire department gaining access from the engine compartment via the heater vent openings of the firewall.

During debris removal and inspection of the driver and passenger side floorboards, it is obvious that there was no evidence of fire originating from within any portion of the interior of the vehicle.

Inspection of the wiring harness on both the driver and passenger side revealed that the majority of the wiring harness insulation was still intact, although melted around the wiring, but there was no indication of electrical failure. It is also important to note that during the inspection of the steering column, that the ignition key was in place and the key was in the "on" position at the time of the fire. This would account for more severe fire damage within the engine compartment as the fuel pump would continue to operate until a circuit is burned through to shut the fuel pump "off."

INVESTIGATION

Based on information I obtained from [REDACTED], she had borrowed the vehicle from the insured's prior to this loss. [REDACTED] stated that she has been borrowing the vehicle off and on since August of 2000.

[REDACTED] stated that prior to the date of the loss, she had the vehicle in her possession for approximately a day and a half. While driving down the road, she stated that she noted an odor of what appeared to be gasoline or the smell of gasoline within the passenger compartment. A second passenger, who rode with her later on that day or the following day, also stated that they noticed the odor or presence of gasoline.

On the date of the loss [REDACTED] had returned home to pick up her kids from relatives who lived next door. She parked the vehicle outside of her home, leaving the vehicle running, and went next door to pick up the children. During the time she was inside the home, someone noted smoke coming from the underneath portion of the vehicle and discovered that the car was on fire.

Case No. A-00206-02

- 4 -

January 29, 2001

Insured: [REDACTED]

with smoke coming from the engine compartment. The fire department was immediately called to respond. Neighbors attempted to suppress the fire by the use of a garden hose and by the time the fire department arrived, heavy fire involvement was located in the engine compartment and extended through into the passenger area.

COMMENTS

After gathering information thus far and conferring with you verbally, I have suspended further activity on this file pending your review of my report. If, during the interim, you have additional instructions, please advise.

Christopher D. Elrod, CFI
Wilmington, North Carolina
(910) 251-0754

cc: Steve W. Langham, CFI

ENCLOSURES

1. Thirty-two (32) Color Photographs With Photo Explanation Sheet

Case No. A-00206-02
Insured: [REDACTED]

Enclosure No. #1

PHOTO EXPLANATION SHEET

- 1-2. Passenger Side Exterior
- 3-4. Driver's Side Exterior
5. Exterior Engine Compartment
- 6-7. Overall Fire Damage in Engine Compartment
8. Close-up of Right Side of Engine
9. Remains of 12-Volt Battery
- 10-12. Close-up of the Remains of Flexible Portion of Fuel Lines
- 13-15. Close-up of Wiring Harness and Battery Cable Remains Showing No Unusual Conditions
- 16-17. Close-up of Lower Portion of Fuel Lines Showing Flexible Part Burned Away
18. Heavy Heat Exposure and Melting to the Side of the Air Conditioning Unit
19. Exterior Hood
- 20-21. Driver's Side Dash and Floorboard Showing No Unusual Conditions
22. Passenger Area as Viewed Through Windshield
- 23-24. Center of Dash and Passenger Side Floorboard
25. Steering Column Showing Melted Material at Location of Keyway
- 26-27. Close-up of Wiring Harness in Dash Showing Heat Exposure Damage
- 28-29. Rear Passenger Area
30. Close-up of Steering Column
31. Location of Key in Steering Column
32. Key Position in the "Forward / On" Position in the Steering Column

PHOTO SHEET

FILE NO. 7-00266



ENG-005-LC1-4838

PHOTO SHEET

FILE NO. 4-00106-02



3



4

PHOTO SHEET

FILE NO. 4-00106-02



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PHOTO SHEET

FILE NO. 4-00206-02



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PHOTO SHEET

FILE NO. S-00206-02



9



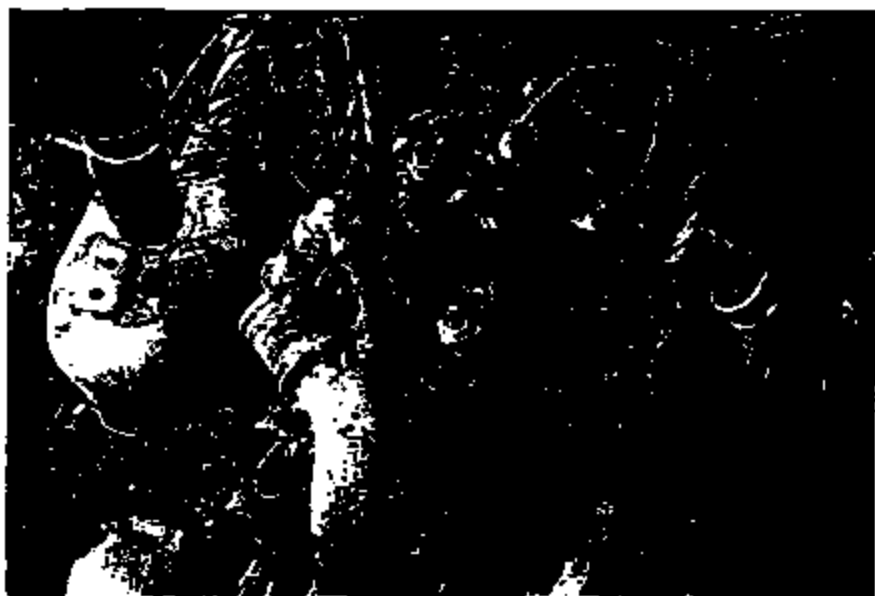
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PHOTO SHEET

FILE NO. A-00206-07



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12

PHOTO SHEET

FILE NO. A-00206-02



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14

PHOTO SHEET

FILE NO. A-00246-02



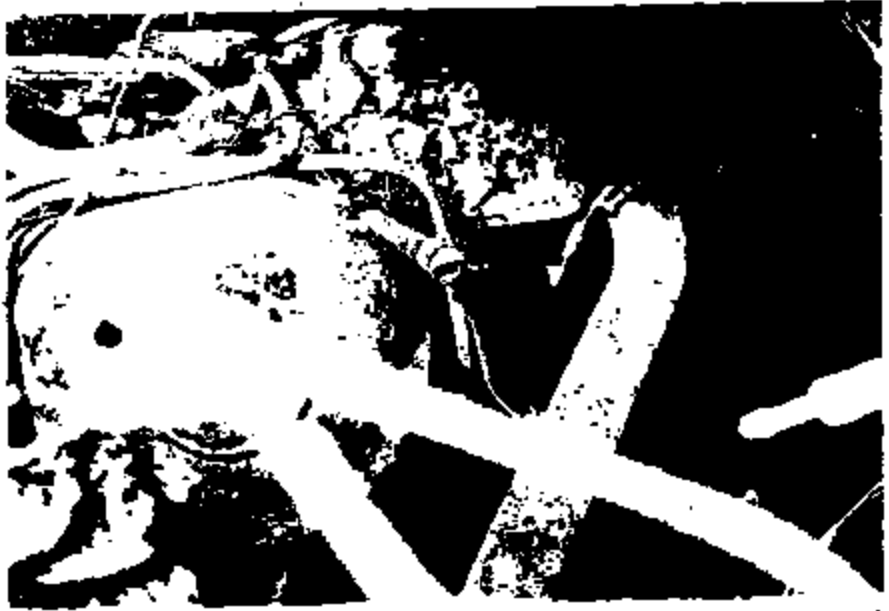
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16

PHOTO SHEET

FILE NO. F-00206-02



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18

PHOTO SHEET

FILE NO. A-00206-02



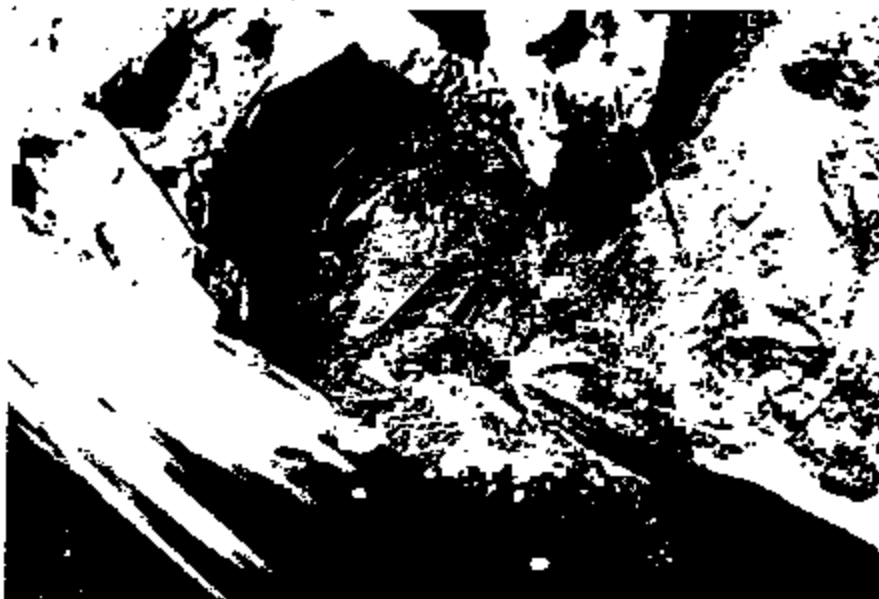
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PHOTO SHEET

FILE NO. A-00206-C



21



22

PHOTO SHEET

FILE NO. A 00206-07



23



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PHOTO SHEET

FILE NO. A-00206-02



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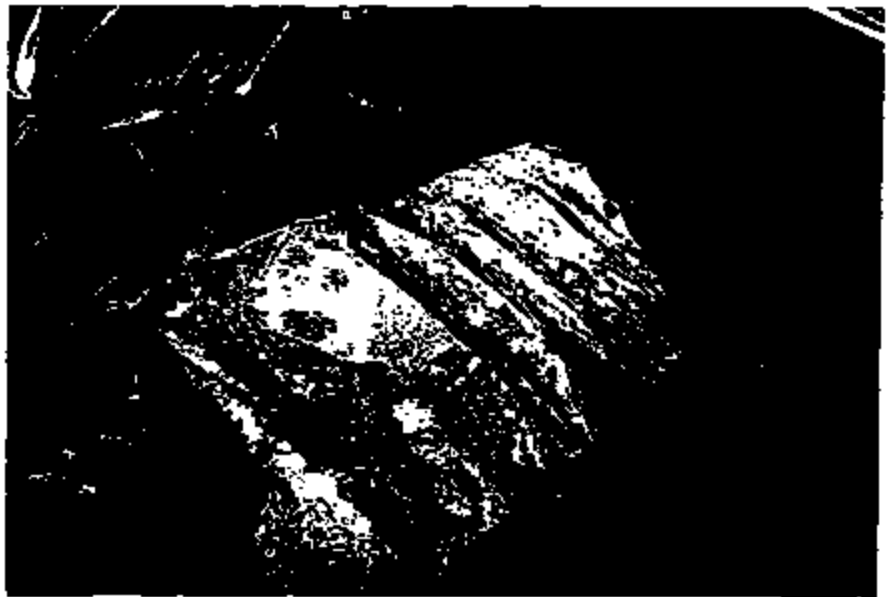
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PHOTO SHEET

FILE NO. 7-00206-0



27



28

ER25-025-LC1-4648

PHOTO SHEET

FILE NO. 4-00206-02



29



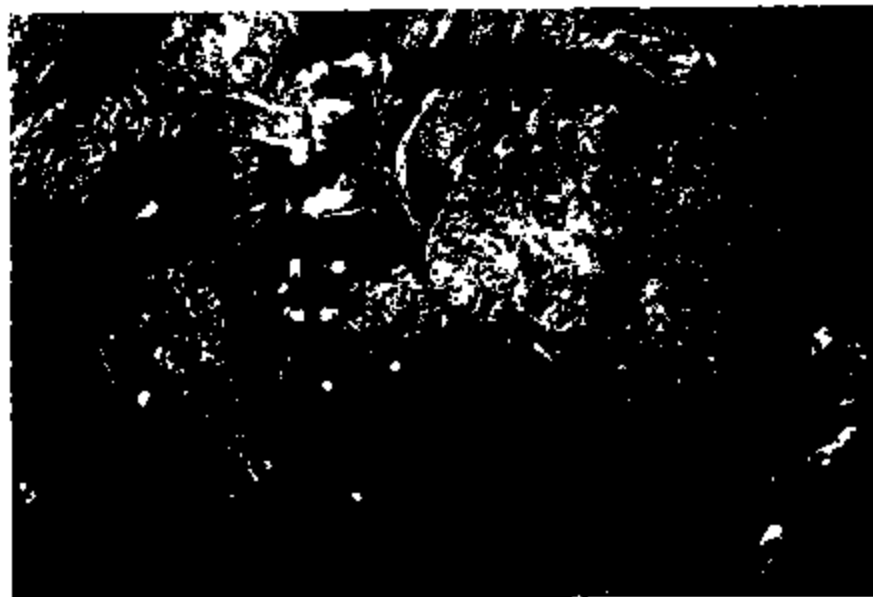
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PHOTO SHEET

FILE NO. A-60206-62



31



32



State Farm Insurance Companies



State Farm Insurance Claim Office
7921 South Hoarner
PO Box 110457
Tacoma, WA 98411
(253) 473-8200

April 4, 2001

Shawn Norton, Claims Analyst
Ford Motor Company
Park Lane Towers West, Suite 300
3 Park Lane Blvd.
Dearborn, MI 48126-2568

RE: Our Insured: [REDACTED]
Date of Loss: December 31, 2000
Our Claim Number: [REDACTED]
Loss Vehicle: 2001 Ford Explorer Sport Track

OK

Dear Mr. Norton:

I am in receipt of your letter dated March 21, 2001. I have enclosed the information you requested. Hopefully, this will help facilitate payment of our claim. I have either listed or attached documentation that should satisfy your request for information. The answers to your request are as follows:

1. December 31, 2000, near Mount Rainier National Park.
2. Please see enclosed transcribed recorded statement.
3. We have not been able to obtain a police or fire report for this particular loss. This information is still being gathered.
6. \$1,030.
7. Please see enclosed photos.
10. The origin of the fire was the top front driver's side area of the engine. The probable causes of the fire are power steering fluid, gasoline, engine oil, or brake fluid leaking onto the driver's side exhaust manifold.
11. Please see enclosed cause and origin report.
13. The 2001 Ford Explorer Sport Track is located at Insurance Auto Auctions, 3130 D Street, SE, Auburn, Washington 98002, phone number 253-735-0138.
14. Please see enclosed ADP Evaluation report.
15. To my knowledge, there has been no service history for this vehicle.

- WA
- 11030 (M)

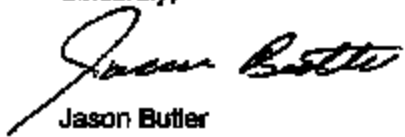
Shawn Norton, Claims Analyst
Claim No.: [REDACTED]
Page 2
April 4, 2001

16. To my knowledge, there has been no after-market additions or modifications made to this vehicle.
20. Yes, the engine was running.
21. Yes, the keys were in the ignition.
24. The purchase date was December 24, 2000, the miles at the time of the purchase was, according to the owner, less than 500 miles. The truck was purchased at Korum Ford, 100 River Road, Puyallup, WA 98371, phone number 253-845-8600.

I hope the above information will enable you to settle our subrogation claim. If you wish to inspect the salvage of [REDACTED] vehicle, please call Insurance Auto Auctions at 253-735-0138, referring to stock number 10000320.

If you request any further information or documentation to support our claim, please call my office at the number listed below. I look forward resolving this matter soon.

Sincerely,



Jason Butler
Senior Claim Representative
State Farm Mutual Automobile Insurance Company
(253) 473-8236

JB/052/0404030

Enclosure



Consulting Engineers
 880 Kibbend Way
 Suite 100
 Kingland, Washington
 USA 98033
 Tel: 425 738 3200
 Fax: 425 828 3128
 Toll Free: 1 800 868 3000
 www.mactag.com

March 15, 2001

Our File Number: 500662

Mr. Jason Butler
 State Farm Insurance
 PO Box 110457
 Tacoma, WA 98411-0457

Dear Mr. Butler,

RE: Claim No: [REDACTED]
 Date of Loss: December 31, 2000
 Your Insured: [REDACTED]

As instructed the vehicle driven by [REDACTED] was examined. A curriculum vitae outlining my education and experience is attached.

1. INCIDENT AS REPORTED

It is understood that on December 31, 2000 [REDACTED] was driving his Ford Explorer in Mount Rainier National Park when it caught on fire.

[REDACTED] stated that he purchased the vehicle on December 24, 2000 and that the mileage was a little over a 1000 miles at the time of the fire. He states that he was driving up an incline and switched to four wheel drive. After traveling about 200 yards he noticed he had to press on the gas pedal much more to keep the vehicle going. When he turned his CD player off he heard the vehicle whining. He then stopped the vehicle and saw very thick white smoke coming out from the edges of the hood. When he opened the hood slightly fire came blazing out and near the right front tire he saw fluid on fire dripping down from the engine.

RECEIVED AUTO CLAIMS

RECEIVED AUTO CLAIMS
 6 2001

TACOMA

2. VEHICLE EXAM

██████████ vehicle was examined on January 17, 2001 at IAA in Auburn, Washington. It was identified as a 2001 Ford Explorer Sport Trac four-door 4WD SUV with automatic transmission and VIN 1FMZU77EX11██████████

Based on the burn pattern, the origin of the fire was determined to be the top front driver's side area of the engine. No evidence of electrical arcing was found. The most likely source of ignition was the driver's side exhaust manifold. Several components under the hood were totally destroyed by the fire. An exemplar vehicle was examined to determine the original layout. This examination revealed several sources of fuel that could have leaked onto the hot exhaust manifold and ignited:

- a) Power Steering Fluid – There is a large plastic power steering fluid reservoir located in the top front driver's side area of the engine. Power steering fluid leaking onto a hot exhaust manifold can ignite. No remains of the power steering fluid reservoir were found.
- b) Gasoline – The fuel supply line travels from the gas tank, along the underneath of the vehicle, and up the front driver's side of the engine, just in front of the exhaust manifold. The section of fuel line near the exhaust manifold is nonmetallic and has a flexible connection. No remains of this section of the fuel line were found. This vehicle is equipped with fuel injection. Most fuel injection systems, including the lines, operate at approximately 40 psi. A leak of even small proportions, for example, a pinhole in the line or a loose fitting, will result in a fine spray of fuel in the engine compartment.
- c) Engine Oil – There is an engine oil dipstick on the driver's side of the engine. Engine oil leaking onto a hot exhaust manifold can ignite. The dipstick was found in a normal stored position.
- d) Brake Fluid – There is a plastic brake fluid reservoir located on the driver's side of the engine. Brake fluid leaking onto a hot exhaust manifold can ignite. No remains of the brake fluid reservoir were found.

3. BACKGROUND RESEARCH

A search of the National Highway Traffic Safety Administration (NHTSA) database revealed no recalls, defect investigations, service bulletins, or customer complaints regarding 2001 Ford Explorer Sport Tracs and vehicle fires.

RECEIVED AUTO CLAIMS
MAR 16 2001
VTCMA

MACINNIS ENGINEERING
Associates Inc.

4. CONCLUSIONS

1. The origin of the fire was the top front driver's side area of the engine.
2. Power steering fluid, gasoline, engine oil, or brake fluid leaking onto the driver's side exhaust manifold probably caused the fire.

Thank you for this assignment. Please call if you have any questions.

Yours very truly,
MACINNIS ENGINEERING ASSOCIATES INC.



Trevor M. Newbery, P.E.
Project Engineer

Attachments: Photographs of Ford Explorer Sport Trac
Photographs of exemplar Ford Explorer Sport Trac
Curriculum vitae

RECEIVED AUTO CLAIMS
MAR 16 2007
BACOM

MACINNIS ENGINEERING
Associates Inc.

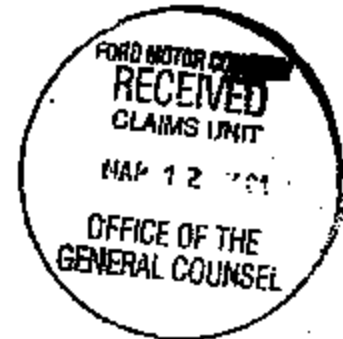
State Farm Insurance Companies



State Farm Insurance Claim Office
7921 South Hosmer
PO Box 110457
Tacoma, WA 98411
(253) 473-8200

March 3, 2001

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



RE: Claim Number: [REDACTED]
Our Insured: [REDACTED]
Date of Loss: December 31, 2000
Make, Model, and Year of Vehicle: 2001 Ford Explorer Sport Wagon
VIN Number: 1FMZU77EX1U [REDACTED]

Dear Sir or Madam:

The identified vehicle is insured by State Farm Mutual Automobile Insurance Company. This vehicle experienced a fire and was determined to be a total loss.

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

Please contact me at (253) 473-8236 to set up a time to inspect the above-mentioned vehicle.

Sincerely,

Jason Butler
Senior Claim Representative
State Farm Mutual Automobile Insurance Company
(253) 473-8236

JB/019/0303010

- 01 EXP
- VIN
- 12/31/00

Photo for: 47-4220-070



2025-085-LC1-4856

PRODUCED BY FORD

PRODUCED BY FORD



Photo for: 47-4220-070

ER05-005-LC1-4689





- 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

4201 Spring Valley Road, Dallas TX 75244-3694

CUSTOMER
RELATIONSHIP
CENTER

2005 FEB 22 11:04

February 11, 2005

Ford Motor Credit
Consumer Affairs Department
A@MD - SNE-B
P.O. Box 6248
Dearborn, MI 48126

RECEIVED

FEB 22 2005

Our Claim Number: [REDACTED]
Our Insured: [REDACTED]
Date of Loss: 11/24/2001
VIN: 1FMYU60E4Y [REDACTED]
Year/Make/Model: 2000 Ford Explorer
Loss Amount: \$17,632.09
Damage: Fire - Total Loss

FORD MOTOR COMPANY
RECEIVED
FEB 23 2005
OFFICE OF THE
GENERAL COUNSEL

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,

R Campbell

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