[redacted]

FILE NO.
AK5390
/as

CIVIL COURT OF THE CITY OF NEW YORK
COUNTY OF QUEENS

----------x

[redacted]

Plaintiff,

-against-

COMPLAINT

Ford Motor Company

Defendant.

----------x

The plaintiffs, by their attorney, complaining of the defendants, respectfully show to the Court and allege:

AS AND FOR A FIRST CAUSE OF ACTION

1. That during the time herein stated and hereinafter mentioned, the plaintiff hereinafter referred to, was and still is a mutual insurance company duly organized under the laws of the State of Illinois, engaged in the legal transaction of business in the State of New York.
2. That during the time heretofore mentioned, plaintiff's subrogor was insured under a policy of insurance issued by the plaintiff and was the owner of a 1999 Lincoln Navigator 4X4 motor vehicle bearing VIN # 5LMPU28L4X1[redacted] that was involved in a fire incident on November 5, 2002 at Bruckner Plaza, Bronx, New York.
3. Upon information and belief that during the time heretofore and at all times hereinafter mentioned, the defendants were doing business within this County, State of New York, as the manufacturer and dealer respectively of automobiles.

4. That on November 5, 2002, plaintiff's subrogor's vehicle was damaged, said vehicle manufactured and sold by the defendants.

5. That the defendants expressly warranted to the plaintiff's subrogor that each part of the vehicle was free of defects in material and workmanship and fit to be used for the purpose intended and that said motor vehicle was of good and merchantable quality.

6. That the aforesaid warranties related to the aforesaid goods was part of the basis and benefit of the bargain.

7. That the said warranties were not true as the vehicle was not warranted and failed to perform to the level expected when used for its ordinary and normal purpose inasmuch as the vehicle on November 5, 2002, while being normally used and driven; with the exercise of due care, suddenly and without warning and solely because of the dangerous, defective, malfunctioning and unsafe condition of said automobile, the parts, appliances, wiring mechanisms and appurtenances thereto, the vehicle suffered a mechanical breakdown and failure and caught fire and sustained property damages as a result of said breach of warranty.

8. That as a result of the foregoing, plaintiff sustained damages in the sum of $25,000.00, and plaintiff has been damaged in said sum.

AS AND FOR A SECOND CAUSE OF ACTION

9. Plaintiff repeats, reiterates and realleges each and every allegation contained in paragraphs "1" through "9" inclusive, of the complaint, with the same force and effect as though herein more fully set forth at length.

10. Upon information and belief that as hereinbefore shown and alleged, the said automobile was faulty, defective and malfunctioning in the respects hereinbefore stated, as said vehicle was being used.

11. The damages sustained were caused by the defendants' failure to properly and adequately manufacture, design and inspect said vehicle as to be free from defects.

12. Upon information and belief, that by reason of all of the foregoing, the plaintiff, has been damaged in the sum of $25,000.00.

WHEREFORE, plaintiff demands judgment against the defendants in its first cause of action in the sum of $25,000.00 and in its second cause of action in the sum of $25,000.00, together with interest, costs and disbursements of this action.

Dated: Huntington, New York
July 18, 2003

SERPE, ANDREE & KAUFMAN
Attorney for Plaintiff
149 Main Street, PO Box 165
Huntington, New York 11743
(631) 421-4488
File No.: AK5396

EMBACHFORM/1/03

VERIFICATION

STATE OF NEW YORK)
) ss.:
COUNTY OF SUFFOLK)

MARK S. ANDREE, being duly sworn, deposes and says:

That deponent is the attorney for the Plaintiff in the within action; that deponent has read the foregoing summons and complaint and knows the contents thereof; and that same is true to deponent's own knowledge, except as to the matters herein stated to be alleged upon information and belief and that as to those matters he believes it to be true.

The grounds of deponent's belief as to all matters are as follows: Investigations and records on file with the Plaintiff and forwarded to your deponent.

MARK S. ANDREE

Sworn to before me on
18th day of July, 2003

CAROL J. DUERR
Notary Public, State of New York
No. 52-4703234
Qualified in Suffolk County
Commission Expires:

JOSEPHINE EDWARDS
Notary Public, State of New York
No. 01ED4812632
Qualified in Suffolk County
Commission Expires:

JANET P. ONEILL
Notary Public, State of New York
No. 01ON4765456
Qualified in Suffolk County
Commission Expires:

EVELYN D. PADLAN
Notary Public, State of New York
No. 01PA5064742
Qualified in Suffolk County
Commission Expires:

MARGARITA GARCIA
Notary Public, State of New York
No. 01GA6094256
Qualified in Suffolk County
Commission Expires:

DANIELLE J. JEAN
Notary Public, State of New York
No. 01JE6094395
Qualified in Suffolk County
Commission Expires: 07

SummonsVerification

afni

Insurance Solutions Group
Subrogation Department
P.O. Box 3068 | Bloomington, IL 61702 | Phone 888-879-6814 | Fax 309-820-2626

May 9, 2003

FORD MOTOR COMPANY
SHAWN NORTON
PARKLANE TOWERS WEST SUITE 300
THREE PARKLANE BLVD
DEARBORN, MI 481262568

RECEIVED MAY 16 2003

Re: Our File #: [redacted]
Our Insured: [redacted]
STATE FARM INSURANCE Claim #: [redacted]
Your Claim #:
Your Insured: FORD MOTOR CO
Date of Loss: November 5, 2002
Amount Claimed: $28,339.96

Dear SHAWN NORTON:

We are contacting you today on behalf of STATE FARM INSURANCE regarding a loss. We have been informed that FORD MOTOR CO was insured with your company at the time of the loss. The facts of the accident indicate your insured is liable for payments that STATE FARM INSURANCE made to its policyholder as a result of this loss. Supporting documentation is enclosed for your review.

Please forward your payment to the address listed above. Should you have any questions, please feel free to contact me at 1-888-879-6814.

Sincerely,

GREG PATTERSON EXT 3577
Subrogation Analyst

CC: LENNY BAMBERG

LANGE TECHNICAL SERVICES, LTD.

ONE AMES COURT, SUITE 210 PLAINVIEW, NEW YORK 11803 (516) 576-3102 FAX (516) 576-3105

FORENSIC ENGINEERING
EQUIPMENT ANALYSIS
ACCIDENT RECONSTRUCTION
FIRE C/O DETERMINATION

February 3, 2003

Mr. Robert Leippe
State Farm Insurance Company
P.O. Box 1259
Melville, New York 11747

Re: Our File No.: 2211-PM-576
Claim No.: [redacted]
Insured:
Vehicle: 1999 Lincoln Navigator
VIN: 5LMPU28L4XI[redacted]
Mileage: N/A
Examined: 11/20/02

Dear Mr. Leippe:

As you requested, the above vehicle was examined at Insurance Auto Auctions in Medford, New York to determine the cause and origin of the fire. The following are our findings and opinions.

General Observations:

The above vehicle is a four door sport utility which was reported to have been parked and running with the heater on for several minutes before the passenger in the vehicle saw smoke appear from below the hood and then exited the vehicle. It is our understanding that the passenger did not smell any gas odor prior to the fire. When examining the flame patterns on the exterior of the vehicle, it was apparent that the fire was concentrated in the engine compartment (Photo Nos. 3 through 7). Additional examination of the front fenders revealed the fire to be most intense on the left side. This is indicated by the burning of the paint on the left fender (Photo No. 8), while the right fender had a slight scorching of the paint (Photo No. 9).

Interior:

Examination of the interior revealed that the fire had entered through the windshield and the left cowl area damaging the top of the dashboard and the headliner. The falling the fire debris damaged the seating area (Photo Nos. 10 through 12).

February 3, 2003

Mr. Robert Leippe
State Farm Insurance Company

Re: Our File No.: 2211-PM-576
Claim No.: [redacted]
Insured:

Examination of the wiring under the dashboard revealed no indications that the fire had originated in this area (Photo No. 13). The fuse box is located on the lower left side of the dashboard. Examination of this area revealed no indications of electrical activity that may have caused or contributed to the fire (Photo No. 14). Mounted to the right rear quarter panel in the cargo area is a 10 disc CD player. Examination of the wiring going to the CD player revealed no indications of electrical activity (Photo No. 15).

Engine and Engine Compartment

The above vehicle is equipped with a 5.4 Liter V8 fuel-injected engine, automatic transmission and has 4 wheel drive capabilities. Analysis of the burn patterns in the engine compartment indicates that the fire originated in the left side of the engine compartment. Photograph number 16 is an overall view of the engine compartment. Although the fire was intense, many consumable materials, such as the hoses, remained. The above vehicle is equipped with plastic fender aprons. It was observed that the left fender apron was consumed during the fire (Photo No. 16). Although the fire was most intense on the left side of the engine compartment, the right side of the engine compartment was examined for indications of a malfunction which may have caused or contributed to the fire.

Located at the right rear of the engine compartment is the transmission filler tube. Examination of this area revealed that the filler tube dipstick was fully inserted. No signs of expulsion of transmission fluid were observed (Photo No. 17). Adjacent to the transmission filler stick located on the right fender apron is the battery and related wiring. Though damaged from the heat of the fire, no signs of electrical activity necessary to cause or create a fire were observed (Photo No. 18).

Mounted to the right front of the engine is the alternator. Examination of the alternator and the related wiring revealed that only the insulation of the wiring going to the alternator was burned as a result of the heat of the fire (Photo No. 19). Examination of the radiator and radiator hoses revealed that they had only been scorched on the top portion due to the high temperatures reached at the top of the engine compartment. Also in this area are the fan shroud and the fan blades that are made of plastic, which were consumed during the fire (Photo No. 20).

Mounted on the left front of the engine is the power steering reservoir, which had been partially consumed during the fire. Had the fire originated in this area this plastic reservoir would likely have been consumed (Photo Nos. 21 and 22).

The oil dipstick tube was examined. No signs of oil expulsion from the tube were observed (Photo No. 23). Examination of the exhaust manifold and surrounding areas also revealed no indications of burned oil residues or leakage consistent with the cause and origin of the fire. Only plastic residues

Mr. Robert Leippe
State Farm Insurance Company

Re: Our File No.: 2211-PM-576
Claim No.: [redacted]
Insured:

were found to exist on the front portion of the exhaust manifold (Photo No. 24). It should be noted that the valve covers are made of a fiberglass material. Had the fire been concentrated in this area, portions of the valve cover would have been consumed (Photo No. 24). Photograph number 25 is an overall view of the left rear portion of the engine compartment. Photograph number 26 reveals the totally consumed plastic fender apron adjacent to the master cylinder. Examination of the wiring in this area revealed that only the insulation covering the wiring harnesses was consumed. No indications of electrical activity, arcing or beading of the wiring was observed. Insulation of the wiring harness was still intact on the forward portions of the harnesses as indicated by the arrow.

Mounted in the left rear corner of the engine compartment adjacent to the fender is located the power distribution center, which was severely damaged from the heat and flames of the fire. However, no electrical activity was noted in this area. Again, insulation remained on the wiring harness directly behind this unit (Photo No. 27).

Examination of the fuel supply and delivery lines along with other components in the fuel system (Photo No. 28) revealed no visible indications of a malfunction. Both safety clips were connected to the delivery and return lines, as indicated by the arrows. Only the plastic lines going to the fuel rail on the right side of the intake manifold melted off during the fire (Photo No. 28). Further examination of this area revealed the insulation to the firewall was still intact with no residues of a fuel spray pattern observed (Photo No. 29).

Mounted to the left rear upper portion of the cowl is the fuel tank purge valve, which contains fuel vapors. When ignited along with the surrounding plastic components and hoses created a secondary fire load and as a result consumed the insulation covering the electrical wiring in this area (Photo Nos. 30 and 31).

Located directly behind this area of the cowl is the windshield wiper motor. Examination of the windshield wiper motor revealed no indications of electrical activity necessary to cause or contribute to the fire (Photo No. 32).

Located in the left rear of the engine adjacent to the consumed plastic fender well is positioned the brake master cylinder. Examination of the brake master cylinder revealed that the reservoir had been totally consumed, as was the top of the brake pressure speed control deactivation switch, which is located in the origin area of the fire (Photo Nos. 33 and 34). Due to the fire and its suppression, wiring in this area had become displaced; therefore the wiring going to the switch could not be confirmed. Although there is no recall for the brake pressure switch, an NHTSA safety recall number 99V124000 outlines a malfunction of the speed control deactivation brake light pressure switch which results in an overheating condition. This overheating creates the potential for fire.

February 3, 2003

Mr. Robert Leippe
State Farm Insurance Company

Re: Our File No.: 2211-PM-576
Claim No.: [redacted]
Insured:

Review of this recall and our findings suggest that although the recall was for 1992 and 1993 Lincoln, it was reported that later year models have been found to have this same defective brake light switch.

Conclusions:

In our opinion, based on the above findings, available information, accuracy of reported statements and conditions of the examination, the fire in the above vehicle originated in the left rear corner of the engine compartment. The fire was caused by an electrical malfunction of the brake pressure switch located at the master cylinder. This condition is consistent with NHTSA safety recall number 99V124, which was for the model year's 1992 and 1993 Lincoln. However, it was reported that several other later model years have been observed to have the same conditions.

Sincerely,

LANGE TECHNICAL SERVICES, LTD.

Michael J. Neumar

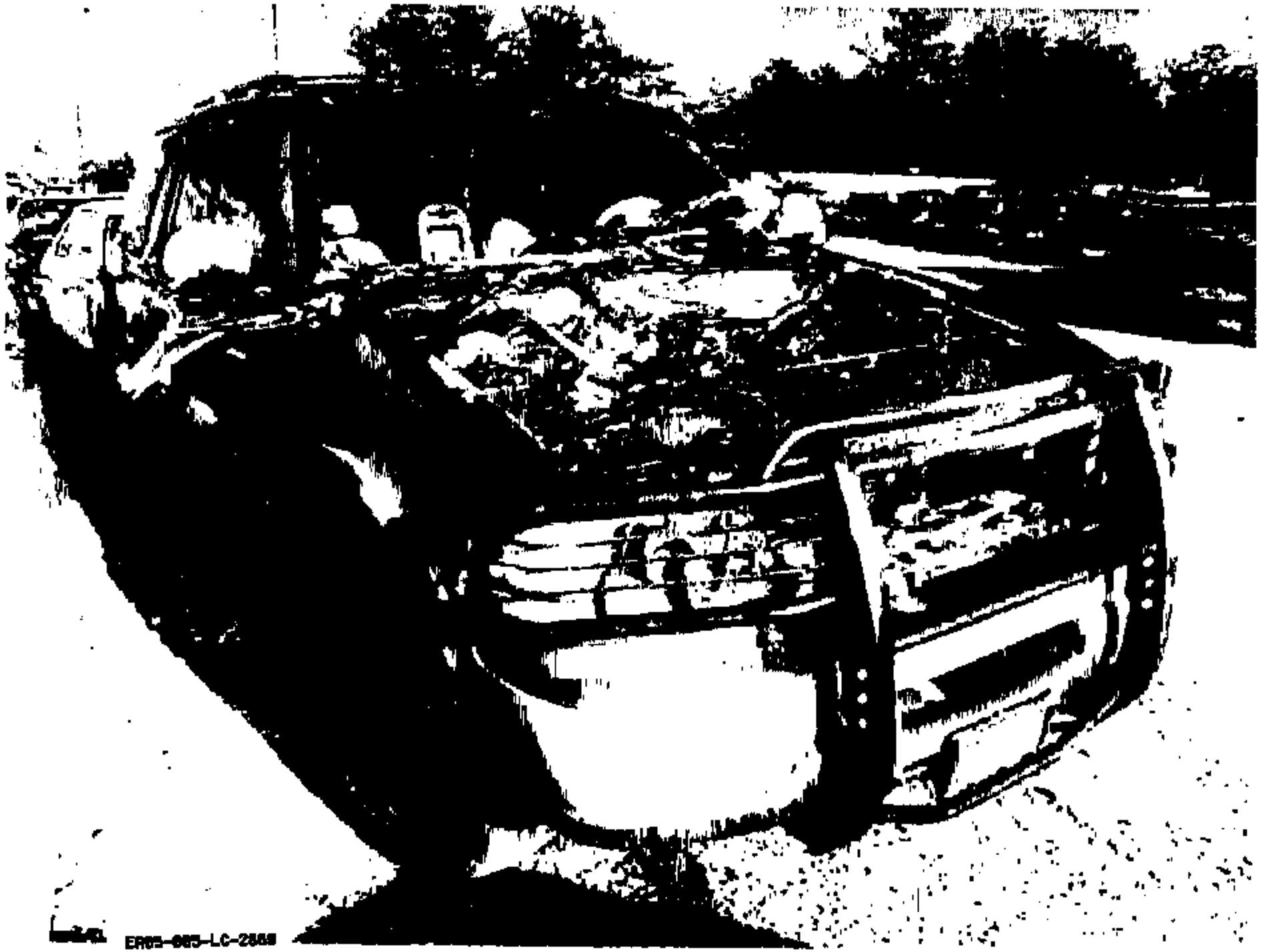
Jeffrey Lange

Carl J. Lange, P.E.

MJN: ps
Enclosures


2002
ERGS-GBS-LC-2667


11 18 2 02



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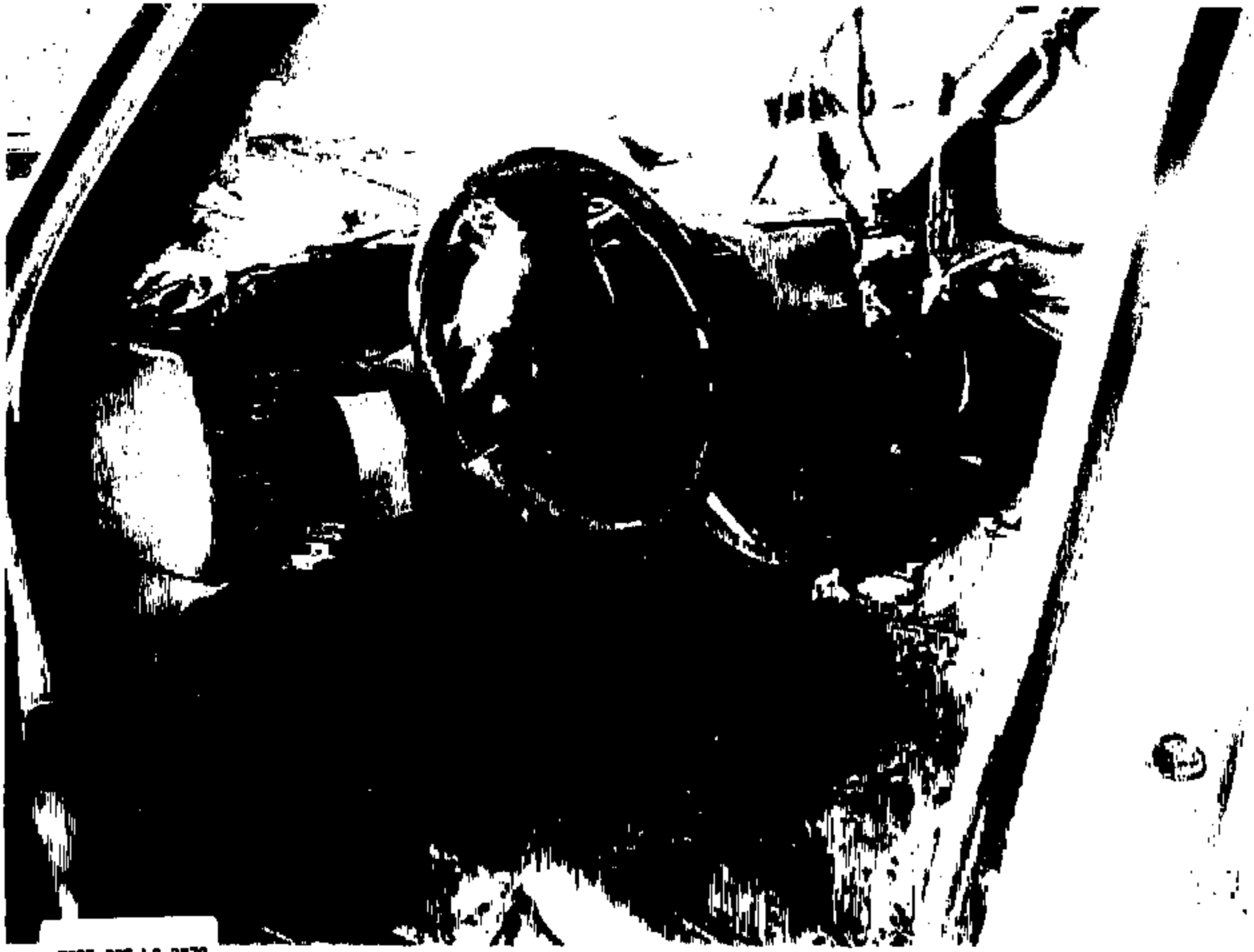

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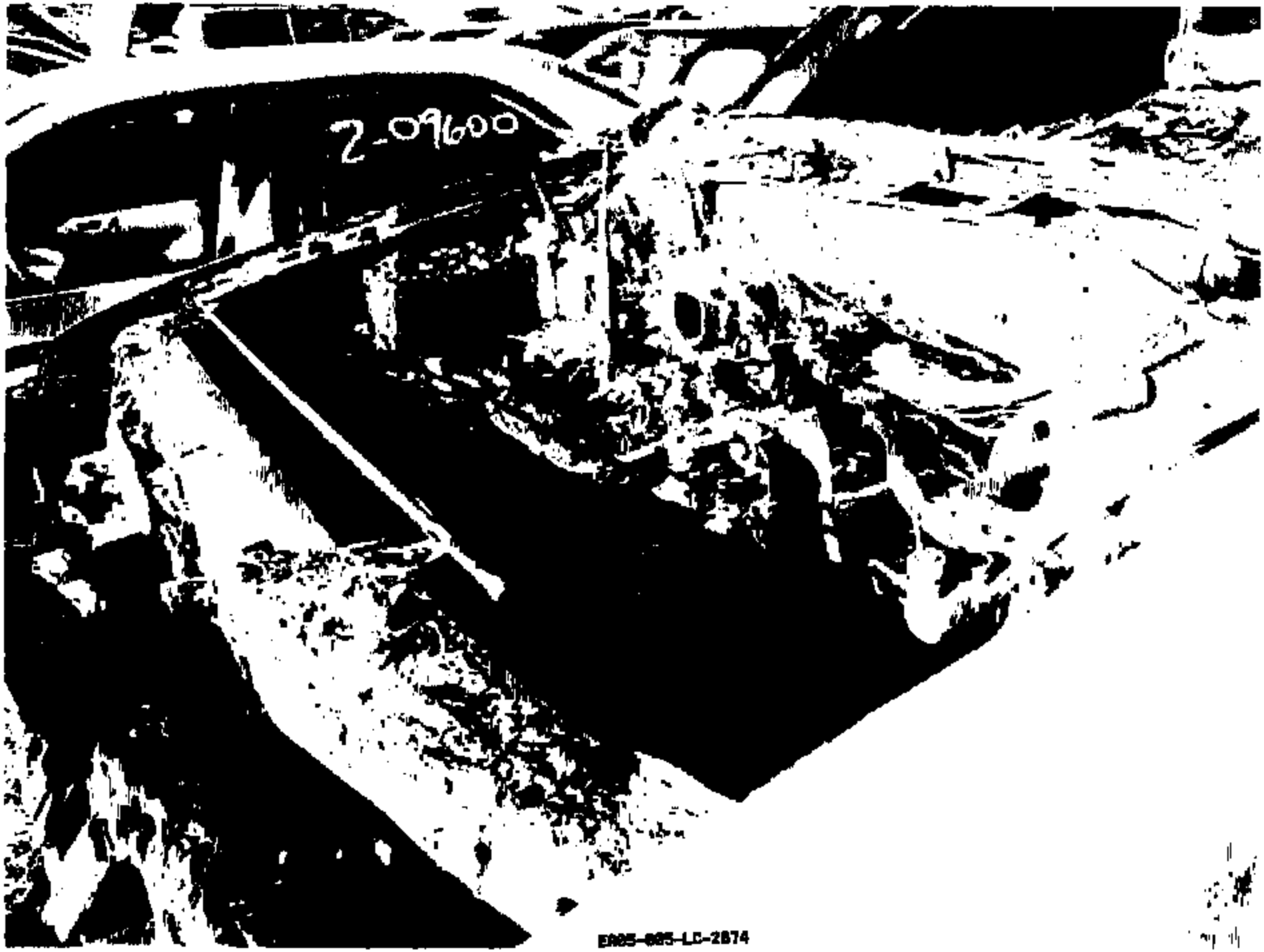

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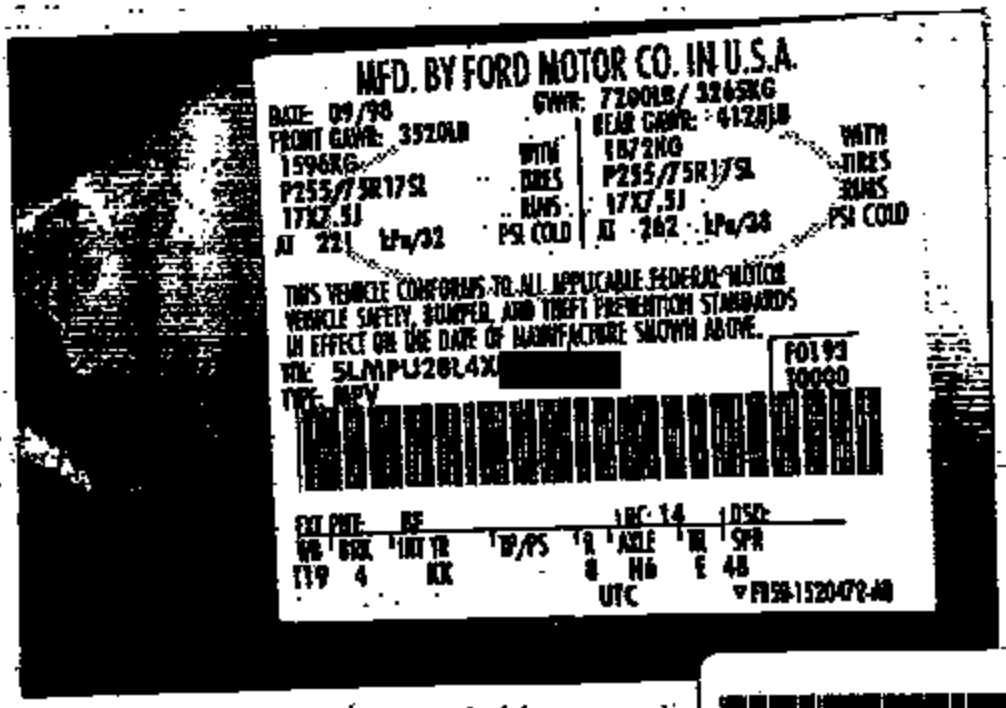


Photo No. 1: Federal sticker

Photo No. 2: Vehicle identification number

Photo No. 3: Right rear of vehicle as examined

Photo No. 4: Left rear of vehicle as examined

Photo No. 5: Left front of vehicle as examined

Photo No. 6: Right front of vehicle as examined

Photo No. 7: Front of vehicle as examined

Photo No. 8: Flame patterns on left front fender

Photo No. 9: Burn patterns on right front fender

Photo No. 10: Right front of interior

Photo No. 11: Left front dash area

Photo No. 12: Rear seating area and passenger compartment

Photo No. 13: Left side under dash and floor area

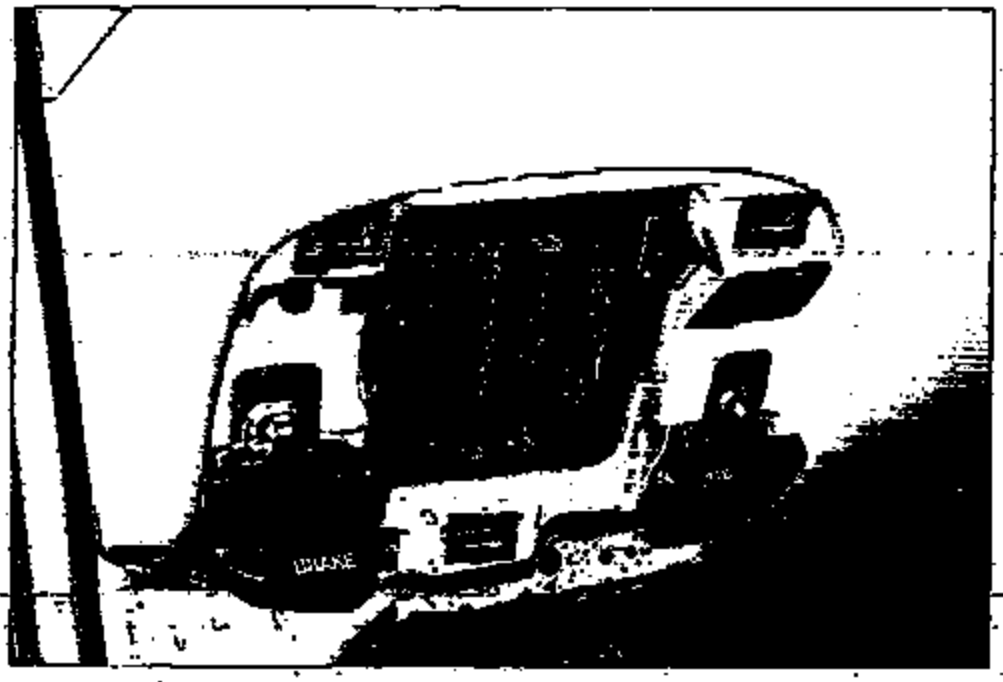


Photo No. 14: Fuse panel

Photo No. 15: CD player in cargo area

Photo No. 16: Overall view of engine compartment

Photo No. 17: Transmission filler and dipstick tube

Photo No. 18: Battery

Photo No. 19: Alternator; note insulation to connectors still intact

Photo No. 20: Radiator and upper hose; note only upper part of hose affected by the heat from the fire

Photo No. 21: Left side of engine; bracketry for power steering pump

Photo No. 22: Partially consumed power steering pump

Photo No. 23: Oil dipstick tube

Photo No. 24: Exhaust manifold, left side as examined

Photo No. 25: Overall view of left rear of engine compartment

Photo No. 26: Left side of engine compartment, fender well area

Photo No. 27: Electronic power distribution box. Arrow indicates insulation for wiring harness still intact.

Photo No. 28: Arrows indicate safety clips on fuel injection supply and return lines.

Photo No. 29: Left rear of engine and cowl area
Note, unburned insulation directly above fuel line connectors.

Photo No. 30: Electrical wiring with insulation burned off as a result of the secondary fire.

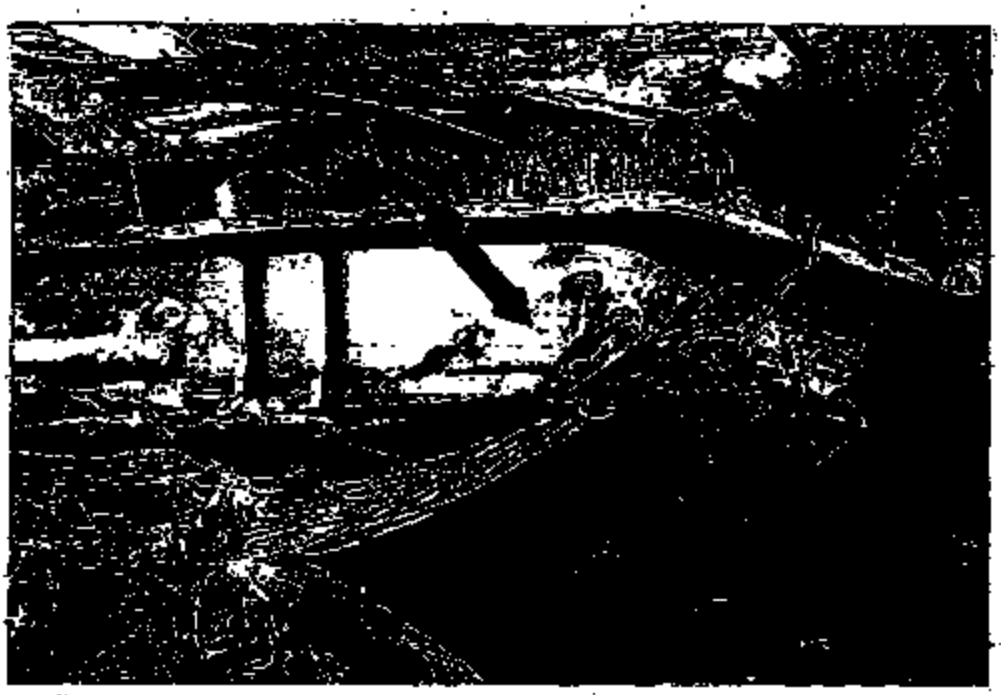


Photo No. 31: Mounting for consumed purge control valve on cowl

Photo No. 32: Electric windshield wiper motor located behind the cowl only a portion of the insulation going to the wiper motor was burned.

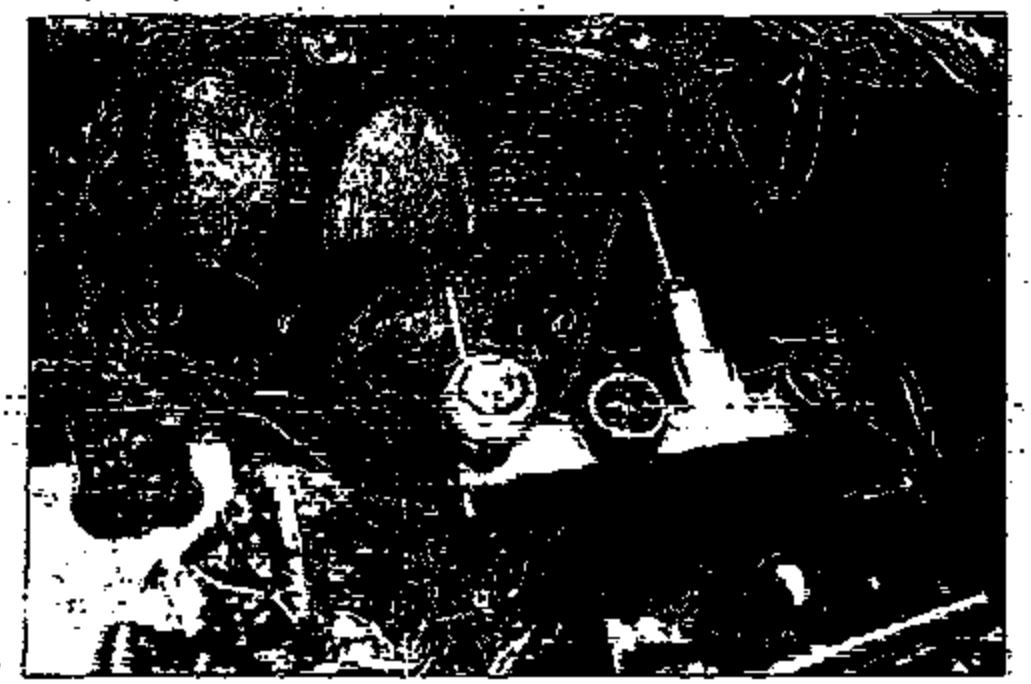


Photo No. 33: Overall view of the master cylinder and left side of engine compartment

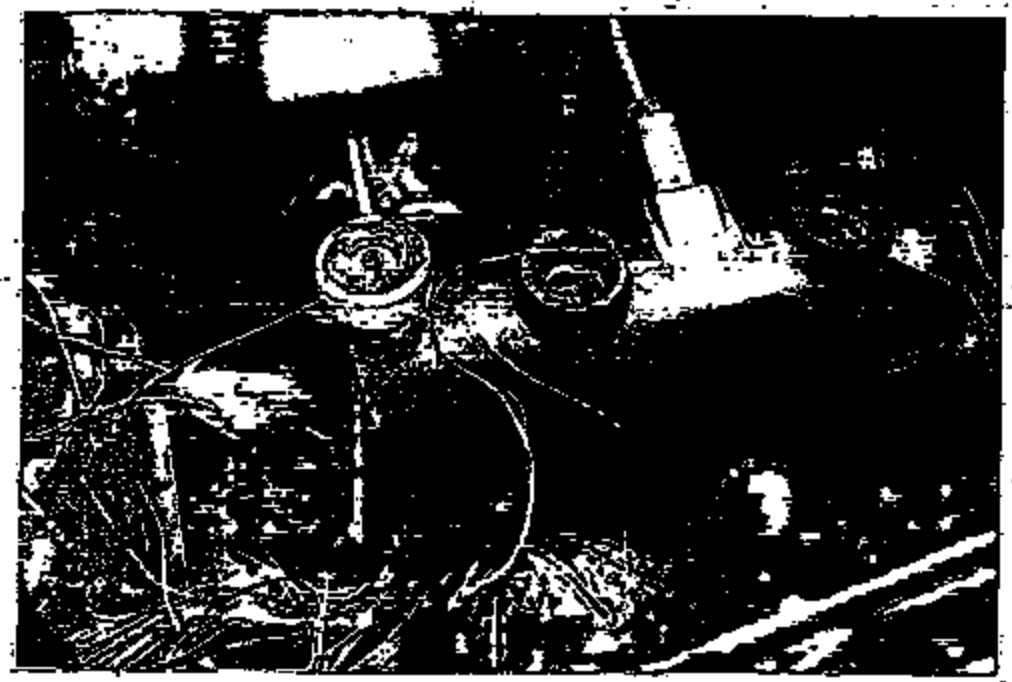


Photo No. 34: Master cylinder and brake pressure deactivation switch Electrical plug was consumed during fire, as was the cylinder reservoir

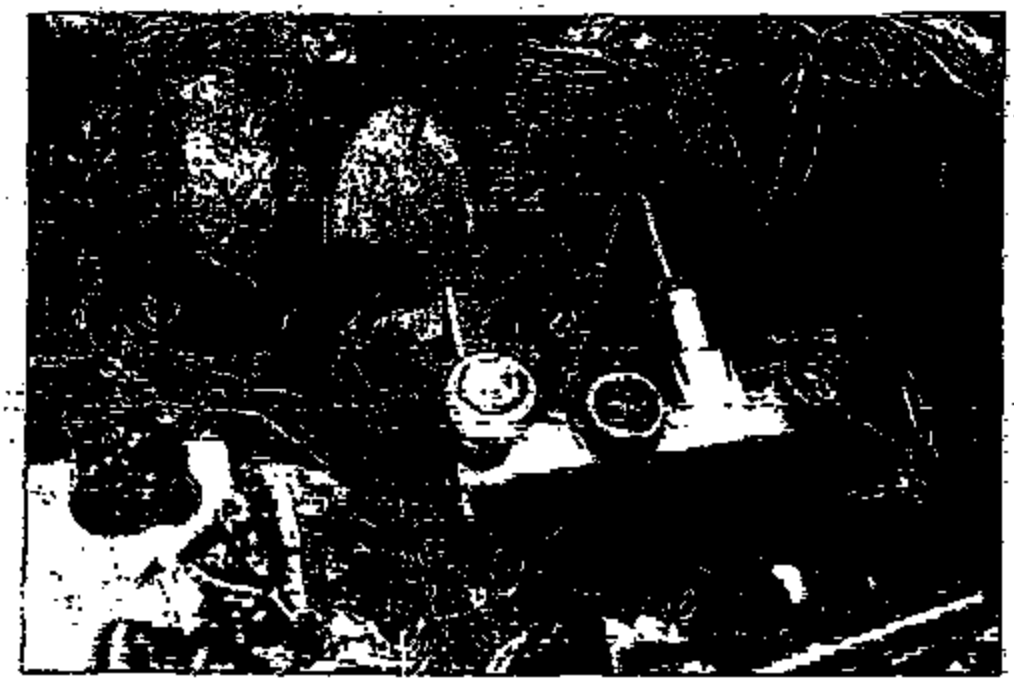


Photo No. 33: Overall view of the master cylinder and left side of engine compartment

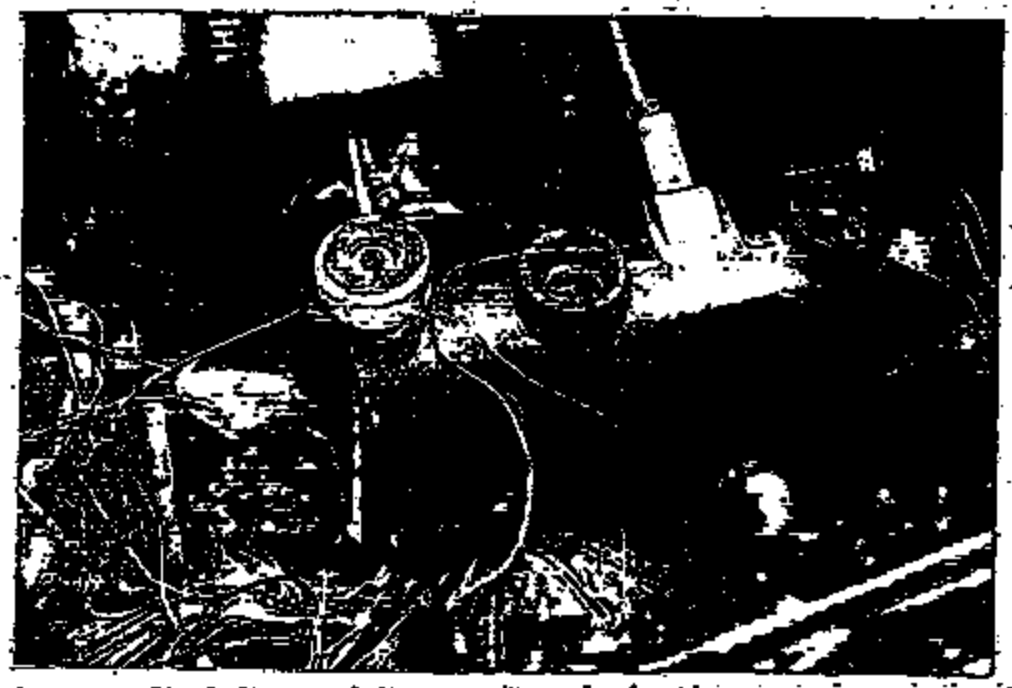


Photo No. 34: Master cylinder and brake pressure deactivation switch. Electrical plug was consumed during fire, as was the cylinder reservoir

[redacted]

Service COPY

[redacted]	*	18TH JUDICIAL DISTRICT COURT
	*	DOCKET NO. 32332 A
VERSUS	*	PARISH OF WEST BATON ROUGE
FORD MOTOR COMPANY	*	STATE OF LOUISIANA

****

PETITION

NOW INTO COURT, through undersigned counsel, come plaintiffs, State Farm Mutual Automobile Insurance Company, a foreign insurer, authorized to do and doing business in the State of [redacted], both persons of the full age of majority domiciled and residing in the Parish of East Baton Rouge, State of Louisiana, who, with respect, represent the following:

1.

Named defendant herein is Ford Motor Company, a foreign company, authorized to do and doing business in the State of Louisiana, who is indebted unto plaintiffs, for the following, to wit:

2.

At all times pertinent hereto, [redacted] were the owners of a certain 1995 Ford F-150 Pickup Truck (hereafter referred to as the [redacted] vehicle").

3.

On or about March 27, 2001, a fire occurred under the hood of the [redacted] vehicle while [redacted] was driving on La. Hwy. 1 in Addis, Louisiana, resulting in substantial fire damage to the [redacted] vehicle.

4.

Plaintiffs allege that the said fire originated in the engine compartment of the1995 Ford F-150 Pickup Truck owned by [redacted]

5.

The fire and resulting damage was caused by a defect in the electrical system or other defects within the 1995 Ford R-150 Pickup Truck.

6.

The 1995 Ford F-150 Pickup Truck was designed, manufactured, assembled and sold by defendant, Ford Motor Company.

7.

Defendant, Ford Motor Company is liable unto plaintiffs for the following acts of negligence and/or fault:

A. Manufacturing, assembling, marketing and/or selling a product which was unreasonably dangerous in construction or composition;

B. Manufacturing, assembling, marketing and/or selling a product which is unreasonably dangerous in design;

C. Manufacturing, assembling marketing and/or selling a product which is unreasonably dangerous because an adequate warning about the product was not provided; and

D. Failure to warn users of the risks/dangers of the product subsequent to acquiring such knowledge.

8.

At all times pertinent hereto, State Farm Mutual Automobile Insurance Company insured the 1995 Ford F-150 Pickup Truck, and provided coverage for the damages sustained thereto.

9.

Pursuant to the terms of its insurance policy and as a result of the fire, State Farm Mutual Automobile Insurance Company paid to or on behalf of its insureds [redacted] the sum of THREE THOUSAND EIGHT HUNDRED EIGHTY-EIGHT AND 55/100 ($3,888.55) DOLLARS.

10.

Petitioner, State Farm Mutual Automobile Insurance Company is subrogated, legally, conventionally, and by the terms of the policy, to the rights of [redacted] against defendant, Ford Motor Company to the extent of payments made herein to, or on behalf of, [redacted]

11.

As a result of the incident described above, [redacted] have suffered a loss of FIVE HUNDRED FIFTY-EIGHT & 97/100 ($558.97) DOLLARS in car rental payments, in addition to loss of use, mental anguish, and inconvenience.

12.

Despite amicable demand, defendant has refused to reimburse plaintiffs for their losses.

WHEREFORE, plaintiffs pray that after due proceedings are had herein, there be judgment in favor of plaintiffs, State Farm Mutual Automobile Insurance Company, and [redacted] and against defendant, Ford Motor Company, for the sum of all damages proven at trial,

together with legal interest from date of judicial demand until paid, and for all costs of these proceedings and for all other general and equitable relief.

By Attorneys:

HANNAH, COLVIN & PIPES
2051 Silverside Drive, Suite 260
Baton Rouge, LA 70808
Telephone: (225) 766-8240

By: _____
W. Ransom Pipes (Bar #17748)
Krystena L. Harper (Bar #27494)

PLEASE SERVE:

FORD MOTOR COMPANY
through its agent for service of process:
CT Corporation Systems
8550 United Plaza Blvd.
Baton Rouge, LA 70809

CERTIFIED
TRUE COPY

MAR 2 0 2002

BY _____ DEPUTY CLERK
WEST BATON ROUGE PARISH

HANNAH, COLVIN & PIPES, L.L.P.
ATTORNEYS AT LAW
2051 SILVERSIDE DRIVE, SUITE 260
BATON ROUGE, LOUISIANA 70808
TELEPHONE: (225) 766-8240
FACSIMILE: (225) 766-5546

MICHAEL P. COLVIN
W. RANSOM PIPES
LAUREL I. McDONALD
KRYSTENA L. HARPER

HANK S. HANNAH
(1951 - 1995)

February 8, 2002

Ms. Shawn Norton
Claims Department
Ford Motor Company
Parklane Tower West, Suite 300
Three Parklane Blvd.
Dearborne, Michigan 48126-2568

Re: State Farm Claim No.: [redacted]
Insured:
Date of Loss: March 27, 2001
Our File No.: 133-2335

Dear Ms. Norton:

Below is the information you requested:

1. March 27, 2001; Addis, Louisiana

2. [redacted], was driving on La. Hwy. 1 in Addis, Louisiana when he noted smoke coming out from under the hood. He pulled into a gas station and was able to extinguish the fire. He had his vehicle towed to Hollingsworth Richards Ford where a service advisor told him the fire was started by the truck's speed control activation switch.

3. None.

4. 1995 Ford Pickup F150, VIN#1FTEX15H6SK[redacted]

5. ~~110,220~~

6. Photographs will be furnished.

7. Plaintiff believes the defect is the truck's speed control activation switch.

8. Expert report and photographs will be furnished.

9. The defective part has been replaced.

10. The vehicle has been repaired and is in the possession of State Farm's insured. Plaintiff is trying to locate the location of the defective part.

11. Attached is a copy of the repair estimate, checks issued and a copy of the invoice for towing charges.

12. Plaintiff does not have a service history for the vehicle.

13. No additions or modifications were made to the vehicle.

14. The engine was running at the time of the incident.

15. Vehicle was purchased new from Richards Hollingsworth.

If you need any further information or wish to discuss this matter, please do not hesitate to contact me.

With kind personal regards, I remain

Very truly yours,

W. Ransom Pipes III

W. Ransom Pipes
(WRPIPES@HCPLLP.COM)

WRP/th
Enclosures
cc: Lisa Chain

HANNAH, COLVIN & PIPES, L.L.P.
ATTORNEYS AT LAW
2031 SILVERSIDE DRIVE, SUITE 260
BATON ROUGE, LOUISIANA 70808
TELEPHONE: (225) 766-8240
FACSIMILE: (225) 766-5546

MICHAEL F. COLVIN
W. RANSOM PIPES
LAUREL I. McDONALD
KRYSTENA L. HARPER

HANK S. HANNAH
(1931 - 1995)

December 5, 2001

New

Via Certified Mail
Ms. Shawn Norton
Claims Department
Ford Motor Company
Parklane Tower West, Suite 400
Three Parklane Blvd.
Dearborne, Michigan 48126

Re: State Farm Claim No.: [redacted]
Insured:
Date of Loss: March 27, 2001
Our File No.: 133-2335

FORD MOTOR COMPANY RECEIVED CLAIMS UNIT DEC 11 01 OFFICE OF THE GENERAL COUNSEL

Dear Ms. Norton:

Please be advised that I have been retained by State Farm Mutual Automobile Insurance Company, in connection with damages sustained as a result of a fire which occurred on March 27, 2001, in the insured's 1995 Ford F-150 Pickup Truck, resulting in damages totaling $3,888.55.

If you would like to inspect the 1995 Ford F-150 Pickup Truck, please include State Farm in the inspection.

By way of this correspondence, State Farm Fire & Casualty Company is placing Ford Motor Company and/or Texas Instruments on immediate notice of this claim as it is seeking full reimbursement of payments made, or to be made, on behalf of its insureds, the Millers. The subject vehicle is available for inspection at Copart of Louisiana in Greenwell Springs, La.

Sincerely,

W. Ransom Pipes/blu

W. Ransom Pipes

WRP/klh
cc: Lisa Chain

- 3/27/01
- '95 - F-150
- $3,889.-

ER05-005-LC-2000

[redacted]

State Farm Insurance Companies

Laredo Claims Office
5901 McPherson, Ste. 15A
Laredo, TX 78041

July 19, 2000

Attention: Shawn Norton
Ford Motor Company
Park Lane Towers West
3 Park Lane Boulevard, Suite 300
Dearborn, MI 48126-2568

RE: Claim Number: [redacted]
Our Insured:
Vehicle: 1997 Ford F150

Dear Mr. Norton:

Our office is providing you with the following information as requested.

1. Date of incident was June 7, 2000 in Laredo, Texas.
2. [redacted] was approximately a block away from his home when he smelled something burning and once he arrived home, he noticed smoke coming out of the engine compartment and opened the hood and noticed a fire which appeared to be next to the master cylinder and the sensor.
3. Enclosed is a copy of the fire report.

6. The mileage at the time of the incident was 87,510.
7. Enclosed are original photographs of the fire damage.

10. The alleged defect was a faulty sensor which caused the fire to begin and caused damage to the hood panel, cruise control module, steering wheel air bag, master cylinder, and engine harness.
11. Photographs enclosed
12. The repairs have been completed.
13. 5901 McFerson Suite 15A
14. The repair estimate is enclosed
15. Name insured service is on the vehicle, and, therefore, does not have any service records.
16. Not applicable

20. The engine was running.
21. The keys were in the ignition.

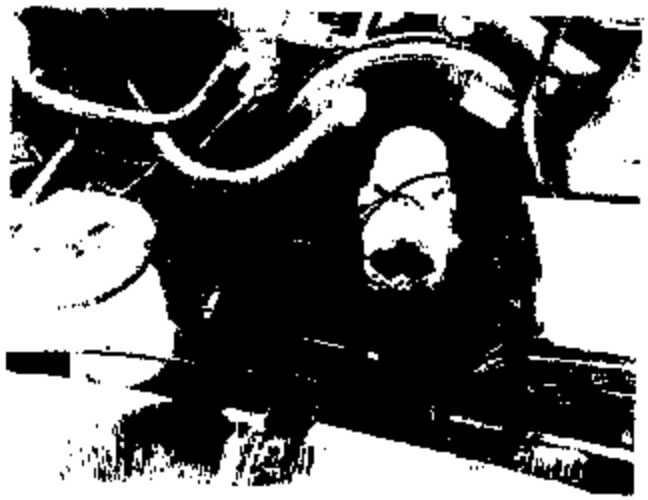
24. The vehicle was purchased on or about April 1999 from Sames Motor Company.

Sincerely,

Carmen V. Arce
Claim Representative
State Farm Mutual Automobile Insurance Company
(956) 727-0982

CVA/hh/025/0719013r

Photo for: 53-C570-250



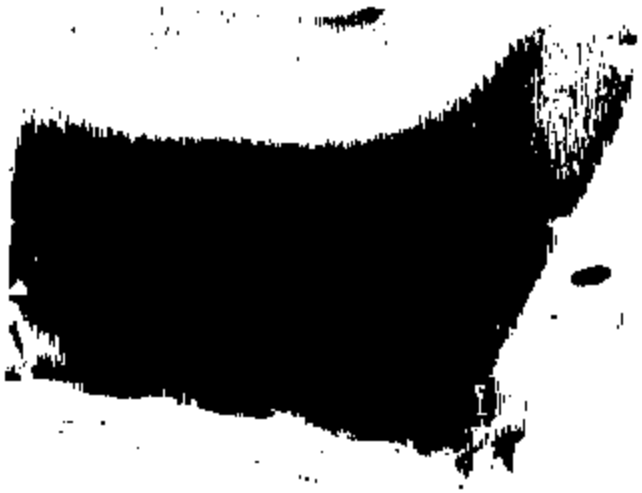


PHOTO TRANSMITTAL

[redacted]

CLAIM NUMBER

DATE OF LOSS

INSURED/CLMT

ER85-865-LC-2862

[redacted]

DATE OF LOSS

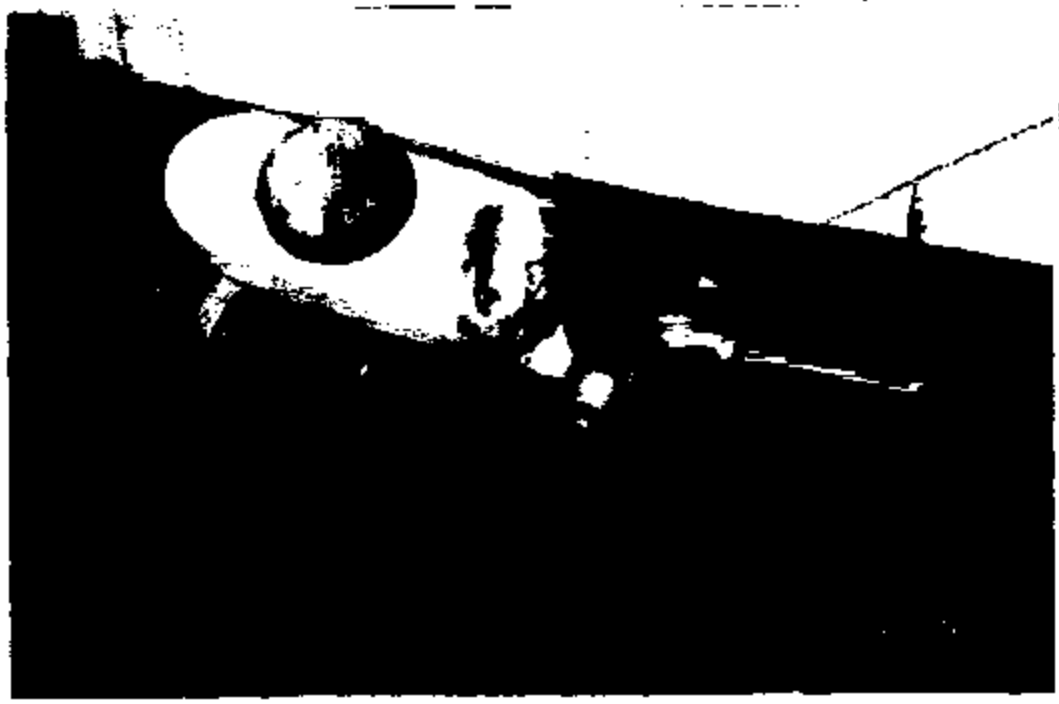
INSURED/CLAIM

EA06-065-LC-2903

[redacted]

DATE OF LOSS

INSURED/CLMT



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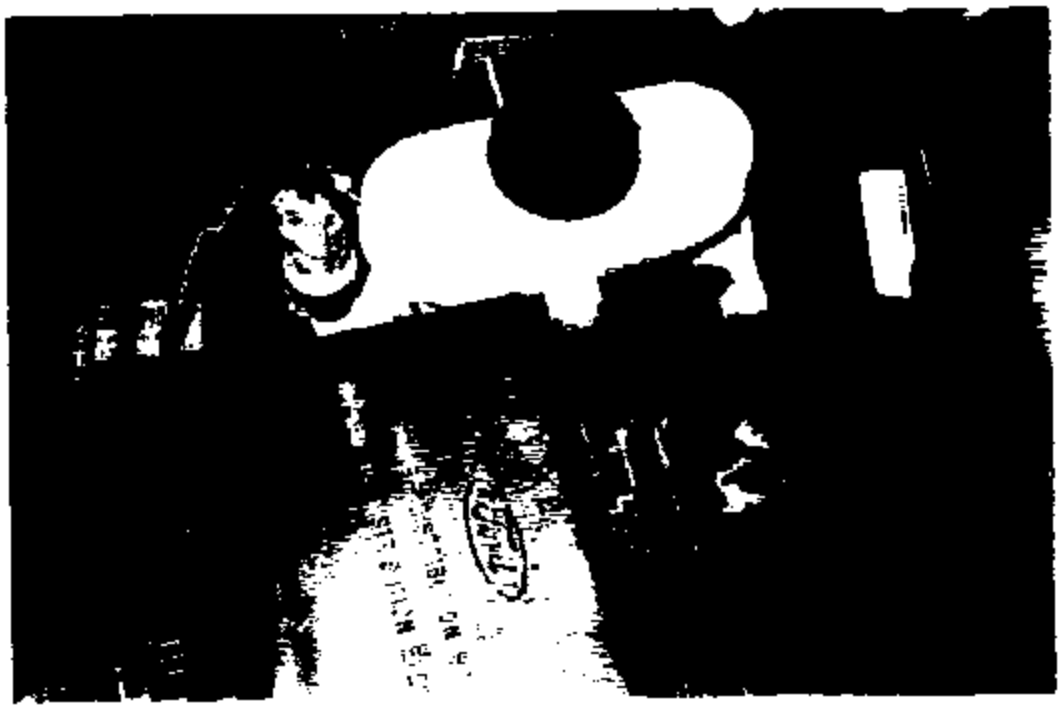
E906-085-LC-2904

ER95-085-LC-2905



ER05-065-LC-2906

PHOTO TRANSMITTAL

[redacted]

CLAIM NUMBER

DATE OF LOSS

INSURED/CLMT

EA05-685-LC-2587

EA85-085-LC-2911

EA85-085-LC-2812

PHOTO TRANSMITTAL

[redacted]

CLAIM NUMBER

DATE OF LOSS

INSURED/CLMT

EA85-885-LC-2813

EA86-085-LC-2914

6A85-003-LC-2916

E085-085-LC-2917

State Farm Insurance Companies

Laredo Claims Office
8901 McPherson, Ste. 16A
Laredo, TX 78041

June 15, 2000

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

RE: Claim Number: [redacted]
Our Insured:
Date of Loss: June 7, 2000
Vehicle: 1997 Ford F150 Lariat
VIN Number: 1FTDX176XV[redacted]

Dear Sir/Madam:

The identified 1997 Ford F150 is insured by State Farm Mutual Automobile Insurance Company. This 1997 Ford F150 experienced a partial fire.

State Farm would like to give you an opportunity to inspect the master cylinder removed and give you advance notice of subrogation claim.

Please contact me at the number listed below.

Sincerely,

Carmen V. Arce
Claim Representative
State Farm Mutual Automobile Insurance Company
(956) 727-0982

CVA/ms/043/0615028r

[redacted]

Liberty Mutual.

Liberty County Mutual Insurance Company

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

April 18, 2005

FORD MOTOR COMPANY
THREE PARKLANE BLVD, STE 300
DEARBORN MI 48126

OUR INSURED:
CLAIM NUMBER [redacted]

DATE OF LOSS: 02/18/2005

FILE NUMBER:
YOUR INSURED:

Dear To Whom It May Concern:

On February 18, 2005, our insured's 2001 Ford F150, VIN #1FTRW07L01[redacted] started to smoke while our insured was driving and the engine subsequently started on fire while stopped on the side of the road causing a total loss to the vehicle. Enclosed are photos, proof of payment, an estimate and a total loss evaluation with mention of safety recalls regarding electrical malfunctions.

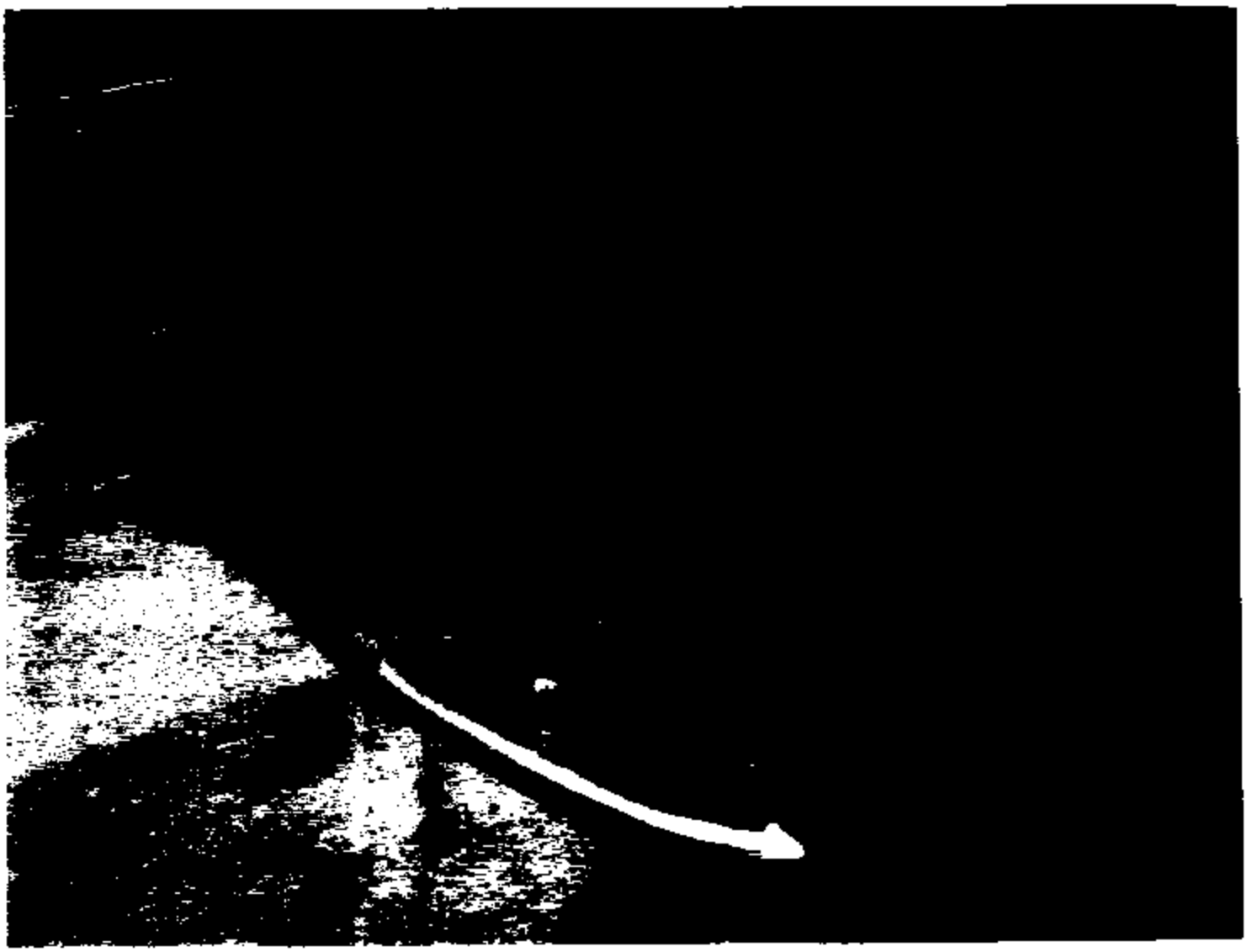
The total damage to our insured's vehicle was $18,375.46. If you have any questions, please contact me.

Thank you.

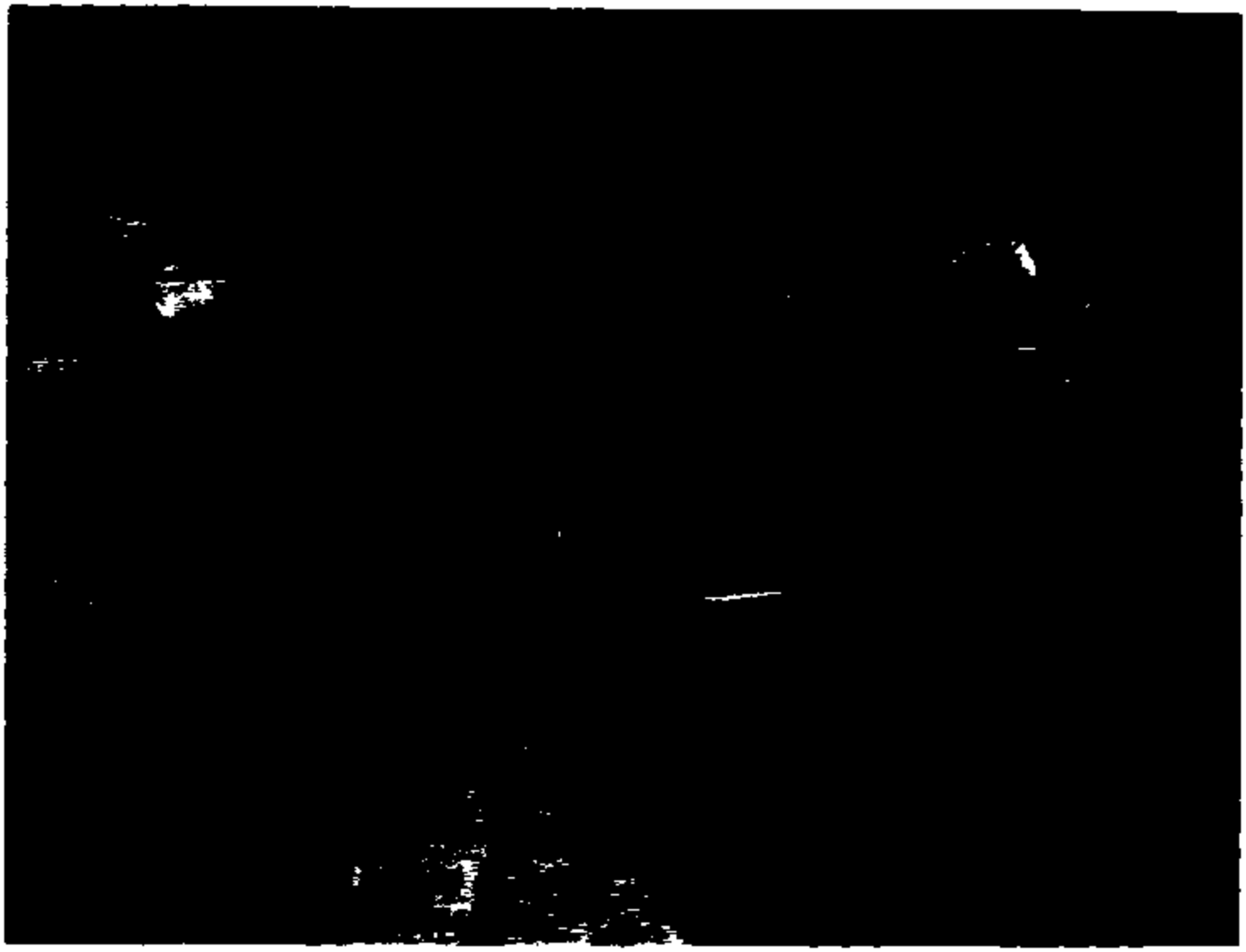
Sincerely,

CHRISTOPHER STRELLA
Subrogation Department
Extension 431

EA05-005-LC-2821



ER85-035-LC-2922



ER85-905-LC-2025

[redacted]

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May 6, 2005

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

[redacted]

Attn: Shawn Norton

– D02 3/18/03

Re: 63 claims relating to cruise control recall

Dear Ms. Norton:

As you will recall you and I spoke 4 weeks ago. I am the manager of a centralized unit that has been handling subrogation claims Nationwide has involving automobile fires and possible defects since September, 2004. We also have been handling these claims for our affiliate company Allied since February, 2005. You have had discussions on several claims with my associates Kathie Styer, Lynn Ellis and Lynn Koenck. Our goal has been to establish a positive working relationship with your company, and to only submit claims to your company having merit.

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I would appreciate discussing this with you or someone at Ford once you have received this and have had an opportunity to review. Please contact me by phone at 315-453-3594, by fax at 614-961-3180 or by EMAIL at mabbetc@nationwide.com. We look forward to continue working with you and your team, building a strong working relationship, and working towards cost effective resolutions of claims for both of our companies.

Sincerely,

Craig Mabbett
Subrogation Manager

FORD MOTOR COMPANY
RECEIVED
MAY 1 3 2005
OFFICE OF THE GENERAL COUNSEL

E985-085-LC-2834

All Action Details for Issue

Print

VIN: 1FTDF0726V[redacted] Year: 1997 Model: F-SERIES Case: 391161125
Name: [redacted] Owner Status: Subsequent WSD: 1996-08-31
Symptom Desc: FIRE/SMOKE VISIBLE FLAME Primary Phone: [redacted]
Reason Desc: LEGAL - INSURANCE COMPANY SETTLEMENT Secondary Phone: [redacted]
Issue Type: 02 INFORMATION Issue Status: CLOSED

Action: ADVISE CUSTOMER TO CONTACT THEIR INSURANCE COMPANY FOR ASSISTANCE
Dealer: Origin Desc: US CONCERN CASE BASE
Odometer: 87000 MI Comm Type: PHONE
Analyst Name: SHIELA PIGEAU Analyst: SPIGEAU
Action Date: 04/22/2005 Action Time: 10.58.18.907 Action Date: No

Caller Information If Different From Vehicle Owner:

First Name	Middle Initial	Last Name	Day Phone	Relationship
ROSANA		BALDERAS		CHILD

Comments CUSTOMER SAID: -VEH CAUGHT ON FIRE ABOUT 1 YR AGO-INSURANCE COMPANY PAID FOR THE REPAIRS AND REBUILD THE VEH-CUST WAS WASHING VEH THE OTHER DAY AND NOTICE COOLANT IN OIL-HUSBAND TOOK VEH TO AN INDEPENDENT -WAS TOLD THIS IS A COMMON ISSUE ON THESE VEH-CUST DID CALL DLR WHEN THE FIRE HAPPENED BUT DLR ONLY SAID TO CALL INSURANCE COMPANY-CUST DID NOT KNOW TO CALL CRC-CUST SEEKING FIN ASST ON THISDEALER SAID: NACRC ADVISED: YOUR INSURANCE COMPANY HAS THE RIGHT TO PURSUE CLAIMS FOR REIMBURSEMENT AGAINST FORD. HOWEVER, FORD WILL BE UNABLE TO INVESTIGATE YOUR CLAIM AS REPAIRS TO YOUR VEHICLE HAVE BEEN PERFORMED AND YOU ARE CURRENTLY IN THE PROCESS OF PURSUING A CLAIM WITH YOUR INSURANCE COMPANY.

All Action Details for Issue

Print

VIN: 1FTDE[redacted] Year: 1997 Model: F-SERIES Case: 391161125
Name: [redacted] Owner Status: Subsequent WSD: 1996-08-31
Symptom Desc: COOLING SYSTEM LEAKS HEAD GASKET Primary Phone: [redacted]
Reason Desc: RECALL/ONP - VEHICLE INVOLVEMENT Secondary Phone: [redacted]
Issue Type: 02 INFORMATION Issue Status: CLOSED

Action: ADVISE CUST NO FSA'S AT THIS TIME
Dealer: 04556 SEGUIN FORD MERCURY Origin Desc: US INQUIRY CASE BASE
Odometer: 97000 MI Comm Type: PHONE
Analyst Name: SHIELA PIGEAU Analyst: SPIGEAU
Action Date: 04/22/2005 Action Time: 10.55.56.509 Action Data: No

Caller Information If Different From Vehicle Owner:

First Name	Middle Initial	Last Name	Day Phone	Relationship
ROSANA		BALDERAS		CHILD

Comments CUSTOMER SAID: -VEH CAUGHT ON FIRE ABOUT 1 YR AGO-INSURANCE COMPANY PAID FOR THE REPAIRS AND REBUILD THE VEH-CUST WAS WASHING VEH THE OTHER DAY AND NOTICE COOLANT IN OIL-HUSBAND TOOK VEH TO AN INDEPENDENT -WAS TOLD THIS IS A COMMON ISSUE ON THESE VEH-CUST DID CALL DLR WHEN THE FIRE HAPPENED BUT DLR ONLY SAID TO CALL INSURANCE COMPANY-CUST DID NOT KNOW TO CALL CRC-CUST SEEKING FIN ASS'T ON THISDEALER SAID: NACRC ADVISED: VEHICLE IS NOT INVOLVED IN ANY RECALL/CSP AT THIS TIME.-REGIONAL RECALL 98R04 IS NOT APPLICABLE TO CUST —DID NOT MENTION 99B29 TO CUST AS IT HAS EXPIRED AND WOULD NOT BE APPLICIBLE—THIS PROGRAM WILL BE IN EFFECT UNTIL MARCH 31, 2001, REGARDLESS OF MILEAGE. SOME OF THE AFFECTED VEHICLES MAY EXPERIENCE ENGINE COOLANT LEAKS AT THE ENGINE FRONT COVER GASKET. IF NOT CORRECTED, THESE COOLANT LEAKS CAN LEAD TO ENGINE DAMAGE IF THE ENGINE OVERHEATS FROM LOW COOLANT OR IF THE OIL IS CONTAMINATED WITH COOLANT.

All Action Details for Issue

Print

VIN: 1FTDF0726V[redacted] **Year:** 1997 **Model:** F-SERIES **Case:** 391161125
Name: [redacted] **Owner Status:** Subsequent **WSD:** 1998-08-31
Symptom Desc: COOLING SYSTEM LEAKS HEAD GASKET **Primary Phone:** [redacted]
Reason Desc: AWA - AWA DENIED **Secondary Phone:** [redacted]
Issue Type: 02 INFORMATION **Issue Status:** CLOSED

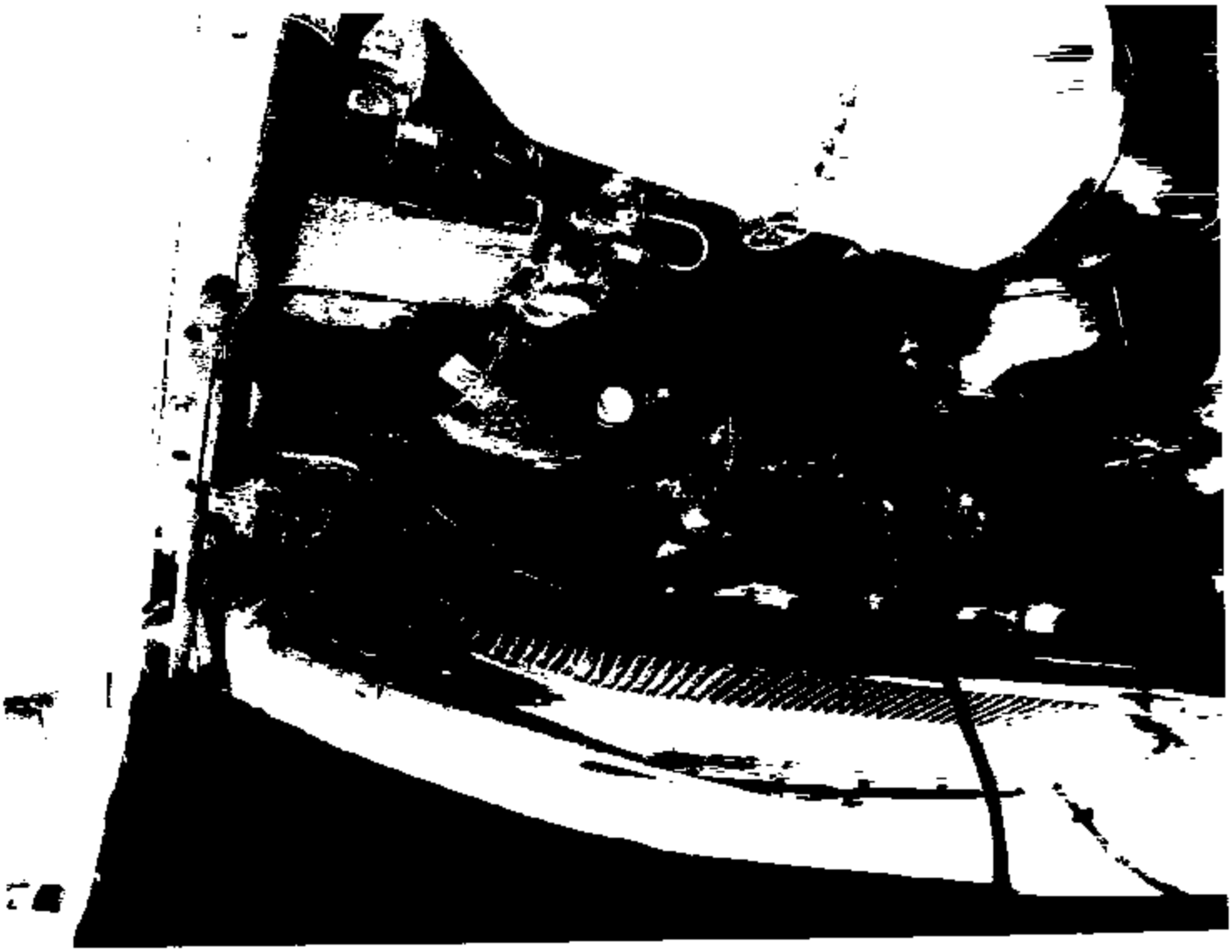
Action: ADVISE CUST VEHICLE IS BEYOND WARRANTY; NO ASSISTANCE
Dealer: 04556 SEGUIN FORD MERCURY **Origin Desc:** US CONCERN CASE BASE
Odometer: 97000 MI **Comm Type:** PHONE
Analyst Name: SHIELA PIGEAU **Analyst:** SPIGEAU
Action Date: 04/22/2005 **Action Time:** 10.51.53.211 **Action Data:** No

Caller Information If Different From Vehicle Owner:

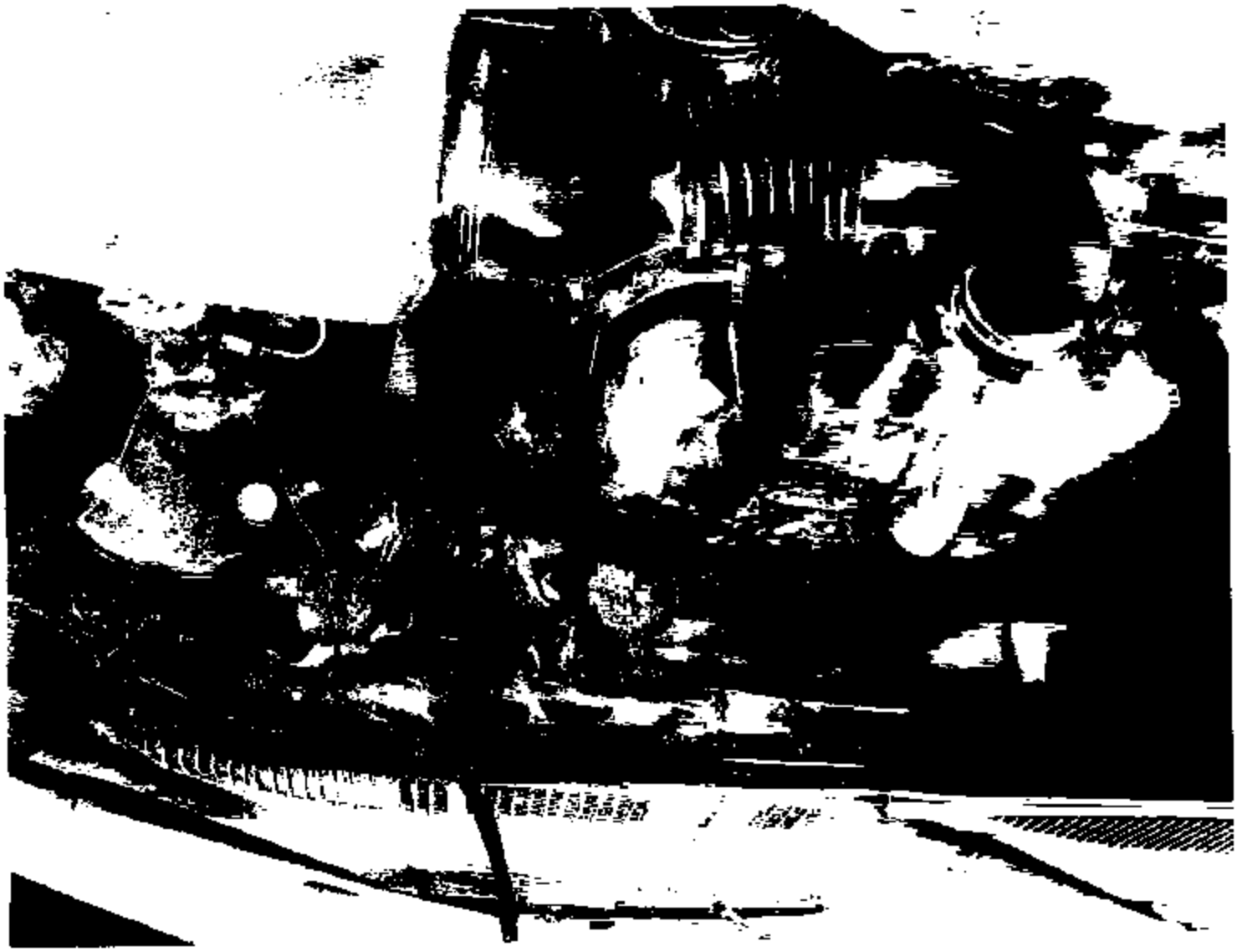
First Name	Middle Initial	Last Name	Day Phone	Relationship
ROSANA		BALDERAS		CHILD

Comments CUSTOMER SAID: -VEH CAUGHT ON FIRE ABOUT 1 YR AGO-INSURANCE COMPANY PAID FOR THE REPAIRS AND REBUILD THE VEH-CUST WAS WASHING VEH THE OTHER DAY AND NOTICE COOLANT IN OIL-HUSBAND TOOK VEH TO AN INDEPENDENT -WAS TOLD THIS IS A COMMON ISSUE ON THESE VEH-CUST DID CALL DLR WHEN THE FIRE HAPPENED BUT DLR ONLY SAID TO CALL INSURANCE COMPANY-CUST DID NOT KNOW TO CALL CRC-CUST SEEKING FIN ASST ON THISDEALER SAID: NACRC ADVISED: I HAVE REVIEWED YOUR SITUATION AND UNFORTUNATELY, THERE ARE NO WARRANTIES, FSA/CSP ON YOUR VEHICLE THAT WOULD PROVIDE ASSISTANCE FOR THIS REPAIR----VEH IS BEYOND AWA GUIDELINES----DID NOT MENTION TO CUST ABOUT 98B29 AS IT EXPIRED **THIS PROGRAM WILL BE IN EFFECT UNTIL MARCH 31, 2001, REGARDLESS OF MILEAGE. SOME OF THE AFFECTED VEHICLES MAY EXPERIENCE ENGINE COOLANT LEAKS AT THE ENGINE FRONT COVER GASKET. IF NOT CORRECTED, THESE COOLANT LEAKS CAN LEAD TO ENGINE DAMAGE IF THE ENGINE OVERHEATS FROM LOW COOLANT OR IF THE OIL IS CONTAMINATED WITH COOLANT.

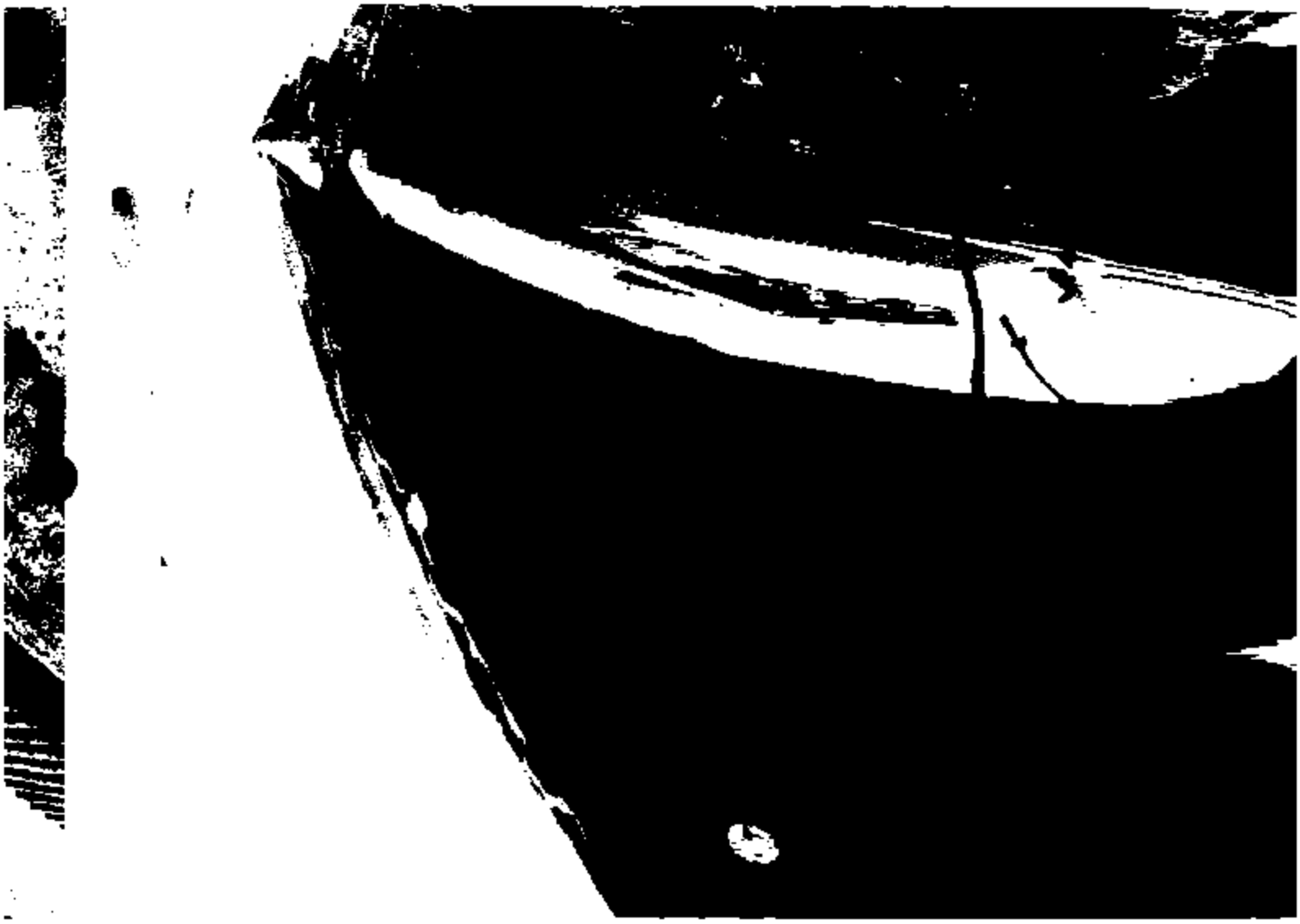
ER05-005-LC-2938



EA05-885-LC-2838



ER06-005-LC-2948



EA85-005-LC-2941

EA05-086-LC-2942

EA05-005-LC-2943

[redacted]

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Nationwide Insurance • 110 Elwood Davis Road, North Syracuse, N.Y. 13212 • 315-453-35[redacted]

May 6, 2005

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

[redacted]

DOL - 3/6/09

Attn: Shawn Norton

Re: 63 claims relating to cruise control recall

Dear Ms. Norton:

As you will recall you and I spoke 4 weeks ago. I am the manager of a centralized unit that has been handling subrogation claims Nationwide has involving automobile fires and possible defects since September, 2004. We also have been handling these claims for our affiliate company Allied since February, 2005. You have had discussions on several claims with my associates Kathie Styer, Lynn Ellis and Lynn Koenck. Our goal has been to establish a positive working relationship with your company, and to only submit claims to your company having merit.

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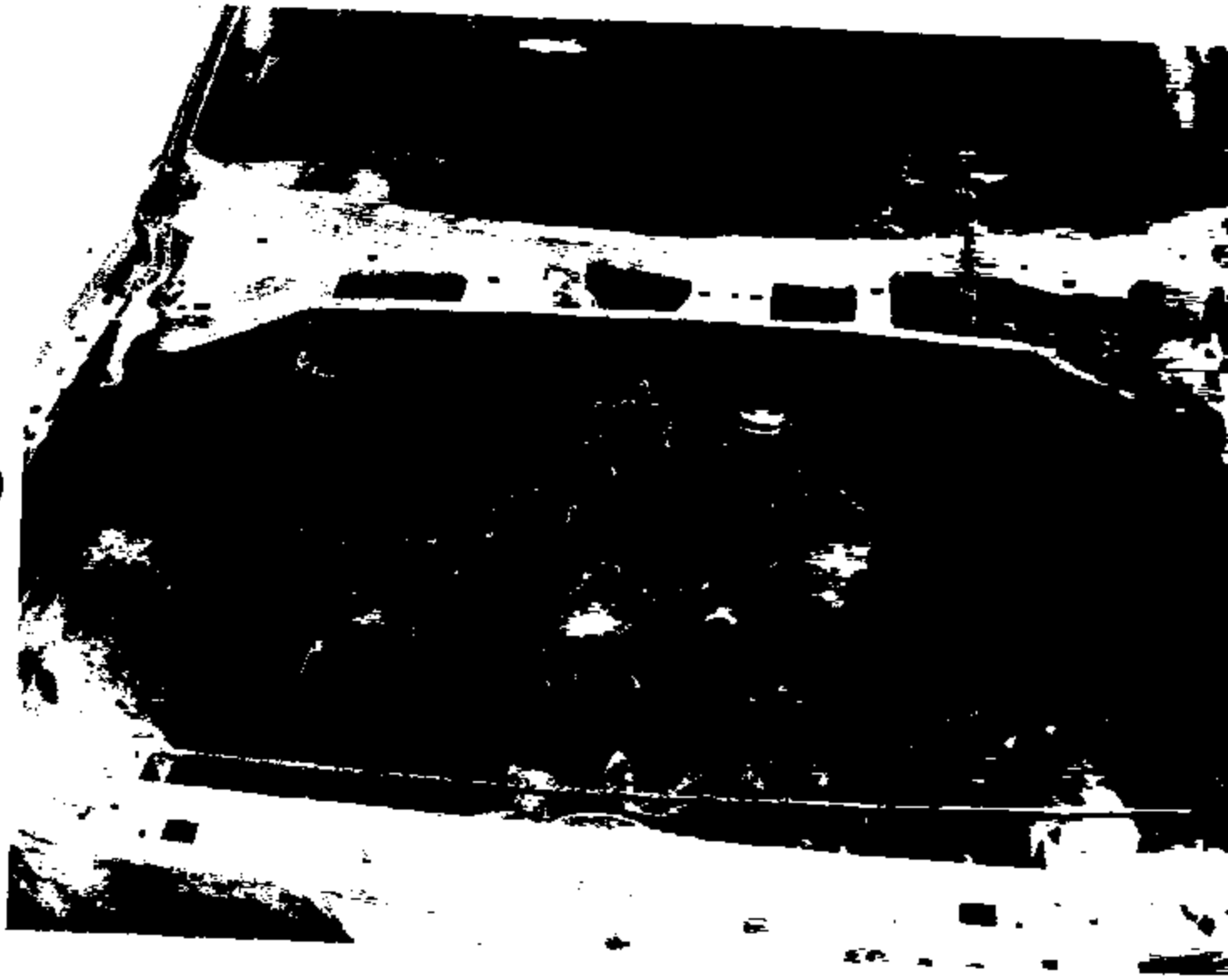
I would appreciate discussing this with you or someone at Ford once you have received this and have had an opportunity to review. Please contact me by phone at 315-453-3594, by fax at 614-961-3180 or by EMAIL at mabbetc@nationwide.com. We look forward to continue working with you and your team, building a strong working relationship, and working towards cost effective resolutions of claims for both of our companies.

Sincerely,

Craig Mabbett
Subrogation Manager

E995-005-LC-2845

E605-605-LC-2846



ER05-066-LC-2947

ER05-025-LC-2948

[redacted]

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May 6, 2005

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

[redacted]

DOL : ??

Attn: Shawn Norton

Re: 63 claims relating to cruise control recall

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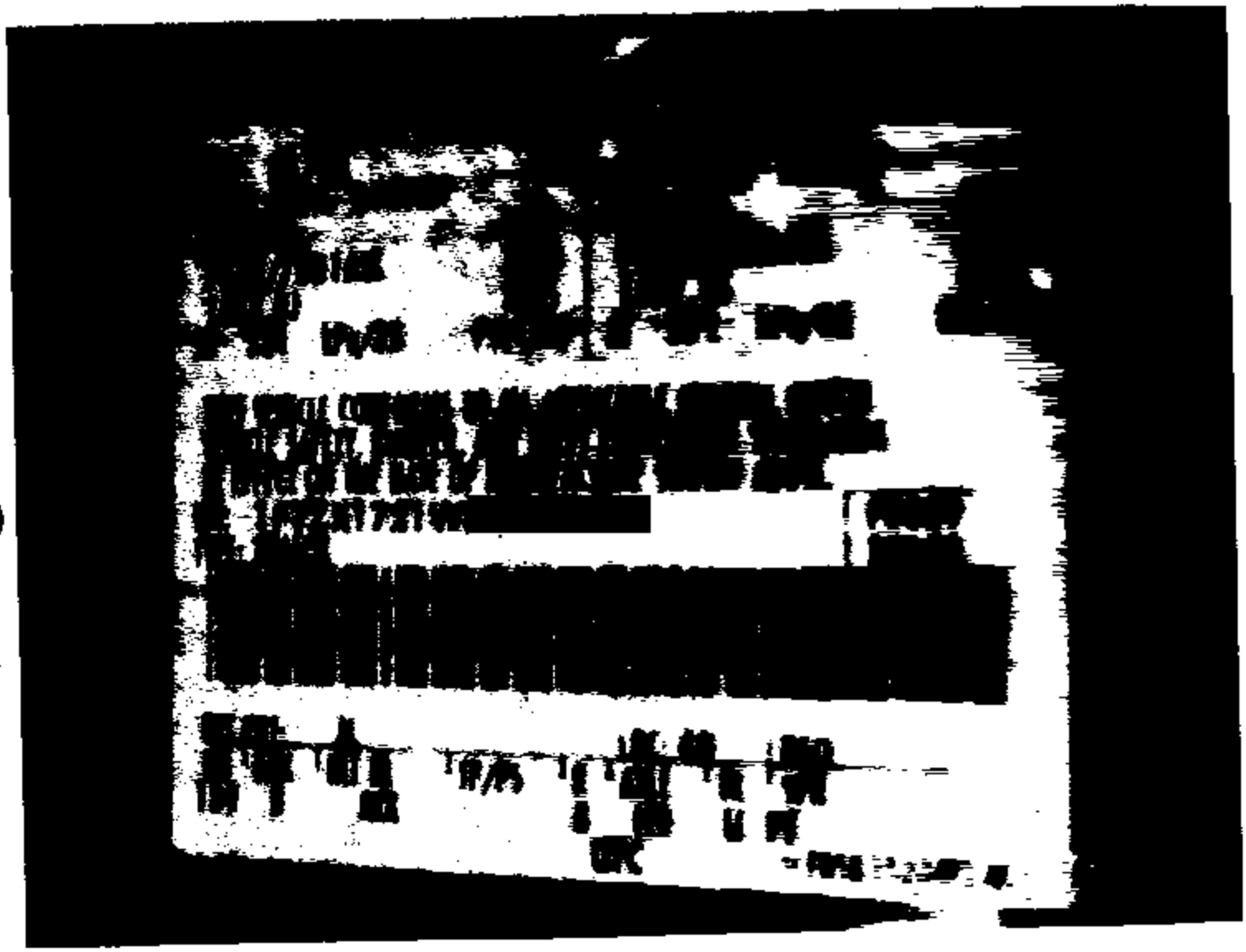
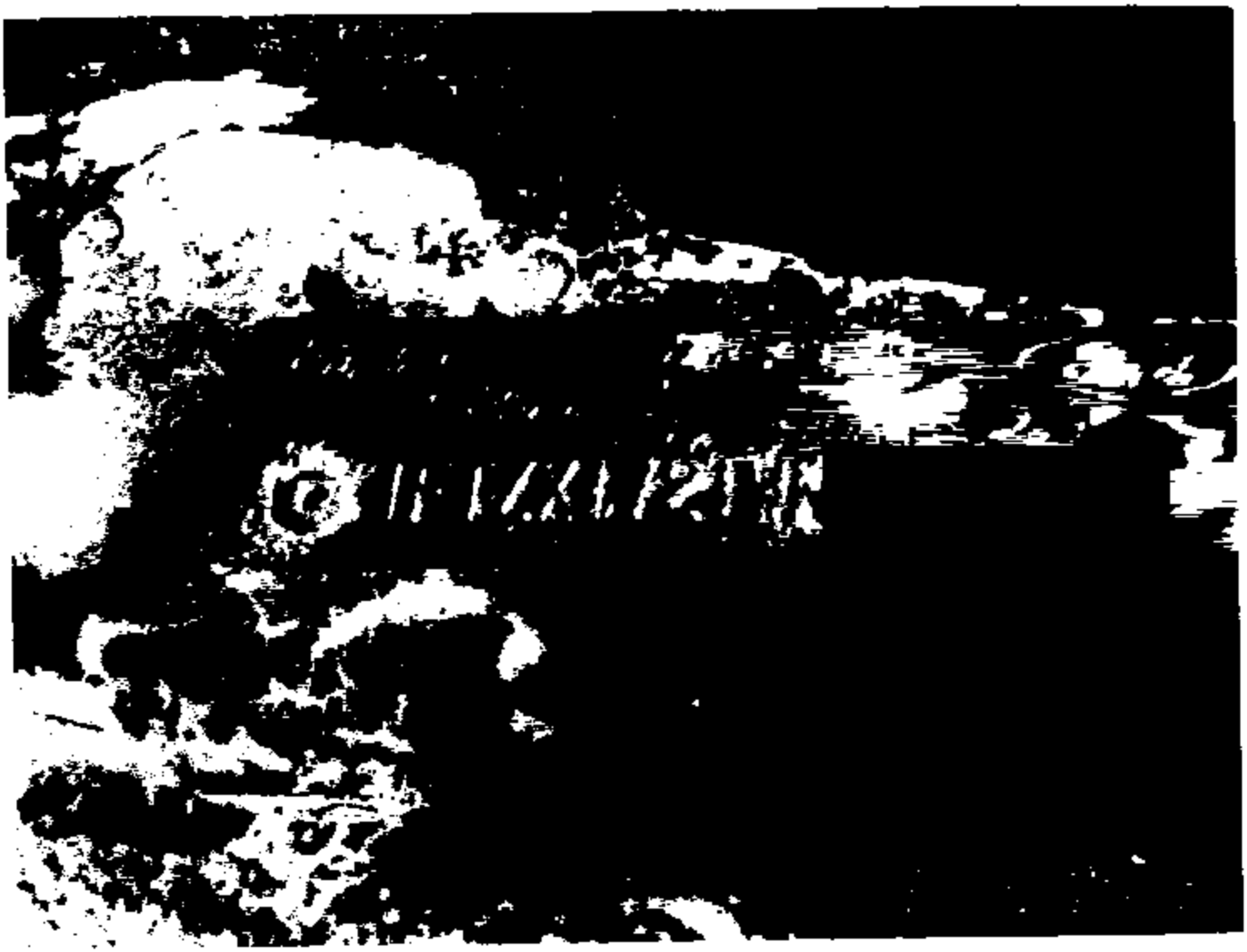
Craig Mabbett
Subrogation Manager

FORD MOTOR COMPANY
RECEIVED
CLAIMS UNIT
MAY 13 2005
OFFICE OF THE
GENERAL COUNSEL



E086-005-LC-2959



ERDS-885-LC-2951

ER05-005-LC-2052

ER05-885-LC-2953

[redacted]

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May 6, 2005

[redacted]

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

Attn: Shawn Norton

6/24/03

Re: 63 claims relating to cruise control recall

DOL

Dear Ms. Norton:

As you will recall you and I spoke 4 weeks ago. I am the manager of a centralized unit that has been handling subrogation claims Nationwide has involving automobile fires and possible defects since September, 2004. We also have been handling these claims for our affiliate company Allied since February, 2005. You have had discussions on several claims with my associates Kathie Styer, Lynn Ellis and Lynn Koenck. Our goal has been to establish a positive working relationship with your company, and to only submit claims to your company having merit.

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Sincerely,

Craig Mabbett
Subrogation Manager

E003-003-LC-2055

E985-985-LC-2956

ER85-883-LC-2857

ISSUE LIST

Last Handling Date/ Issue Status	Name/ Reason Desc	Vin/ Case No.	Model Year and Vehicle Line	Issue Type
9/2/1999		1FMPU18L5X[redacted]	1999 EXPEDITION	03
CLOSED	WARRANTY - MULTIPLE REPAIR	431842009		
9/2/1999		1FMPU18L5X[redacted]	1999 EXPEDITION	03
CLOSED	WARRANTY - BUMPER-TO-BUMPER	431842009		
7/23/1999		1FMPU18L5X[redacted]	1999 EXPEDITION	02
CLOSED	PROD/COMP DUR/PERF - VEHICLE QUALITY	431842009		
7/21/1999		1FMPU18L5X[redacted]	1999 EXPEDITION	03
CLOSED	WARRANTY - MULTIPLE REPAIR	431842009		
7/20/1999		1FMPU18L5X[redacted]	1999 EXPEDITION	02
CLOSED	PROD/COMP DUR/PERF - VEHICLE QUALITY	431842009		

All Action Details for Issue

Print

VIN: 1FMPU18L5XL[redacted] Year: 1999 Model: EXPEDITION Case: 431642009
Name: Owner Status: Original WSD: 1999-05-28
Symptom Desc: CLIMATE CTRL. LACK OF HEAT AUTO TEMP CTRL. Primary Phone:
Reason Desc: WARRANTY - MULTIPLE REPAIR Secondary Phone:
Issue Type: 03 CONCERN Issue Status: CLOSED
Initial Customer Contact:

Action: REQUEST CRM/SVC MGR TO CONTACT CUSTOMER
Dealer: 03857 SAYVILLE FORD Origin Desc: GENERAL CAC
Odometer: 5500 MI Comm Type: PHONE
Analyst Name: HEATHER MARSTON Analyst: HMARSTON
Action Date: 08/09/1999 Action Time: 09.53.08.960 Action Data: No

Caller Information If Different From Vehicle Owner:

First Name	Middle Initial	Last Name	Day Phone	Relationship
ORQUEL		D'AMADEO		SPOUSE

Comments CUSTOMER SAYS: HAD VEH AT DLR 6 TIMES FOR AIR CONDITIONING CONCERN; CUST PICKED UP VEH ON JULY 20/99 STATING SHE IS STILL HAVING SAME PROBLEM; A/C IS NOT COOLING; A TECH DID COME TO LOOK AT THE VEH. CUST WAS HOPING THAT THEY WOULD BE THE ONES THAT WOULD PERFORMED THE REPAIR ON HER VEH. CUST WOULD LIKE TO HAVE THEN FIX THE VEH AND NOT THE DLR. SHE DOES NOT FEEL THAT THEY ARE CAPABLE OF DOING THE REPAIR. CUSTIS REQUESTING TO HAVE THE FIELD REP COMCE TO LOOK AT HER VEH AGAIN BUT AT A DIFFERENT DLR. PER CUSTOMER, DEALER SAYS: CAC ADVISED: - VEHICLE UNDER BUMPER-TO-BUMPER WARRANTY - WILL FORWARD INFORMATION TO THE DEALERSHIP, WITH A COPY TO THE REGIONAL OFFICE - WILL REQUEST CRM/SERVICE MANAGER CONTACT CUSTOMER WITHIN 2 BUSINESS DAYS INFERENCE CASE ID: 4569

Action: ADVISE CUST INFO WILL BE SENT TO DLR; CONTACT CRM
Dealer: 03857 SAYVILLE FORD Origin Desc: US CONCERN CASE BASE
Odometer: 5500 MI Comm Type: PHONE
Analyst Name: HEATHER MARSTON Analyst: HMARSTON
Action Date: 08/09/1999 Action Time: 09.53.08.960 Action Data: No

Caller Information If Different From Vehicle Owner:

First Name	Middle Initial	Last Name	Day Phone	Relationship
ORQUEL		D'AMADEO		SPOUSE

Comments CUSTOMER SAYS: HAD VEH AT DLR 6 TIMES FOR AIR CONDITIONING CONCERN; CUST PICKED UP VEH ON JULY 20/99 STATING SHE IS STILL HAVING SAME PROBLEM; A/C IS NOT COOLING; A TECH DID COME TO LOOK AT THE VEH. CUST WAS HOPING THAT THEY WOULD BE THE ONES THAT WOULD PERFORMED THE REPAIR ON HER VEH. CUST WOULD LIKE TO HAVE THEN FIX THE VEH AND NOT THE DLR. SHE DOES NOT FEEL THAT THEY ARE CAPABLE OF DOING THE REPAIR. CUSTIS REQUESTING TO HAVE THE FIELD REP COMCE TO LOOK AT HER VEH AGAIN BUT AT A DIFFERENT DLR. PER CUSTOMER, DEALER SAYS: CAC ADVISED: - VEHICLE UNDER BUMPER-TO-BUMPER WARRANTY - WILL FORWARD INFORMATION TO THE DEALERSHIP, WITH A COPY TO THE REGIONAL OFFICE - WILL REQUEST CRM/SERVICE MANAGER CONTACT CUSTOMER WITHIN 2 BUSINESS DAYS INFERENCE CASE ID: 4569

Action: CUSTOMER REFUSES TO HAVE WORK DONE
Dealer: 03857 SAYVILLE FORD Origin Desc: DEALER
Odometer: 5500 MI Comm Type: PHONE
Analyst Name: SAYVILLE FORD Analyst: F13103

Action Date: 09/02/1999 **Action Time:** 12.53.27.116 **Action Data:** No

Comments NO REPAIR

All Action Details for Issue

Print

VIN: 1FMPU18L5X[redacted] Year: 1999 Model: EXPEDITION Case: 431842009
Name: Owner Status: Original WSD: 1999-05-28
Symptom Desc: CLIMATE CONTROL, LACK OF COOLING Primary Phone:
Reason Desc: WARRANTY - BUMPER-TO-BUMPER Secondary Phone:
Issue Type: 03 CONCERN Issue Status: CLOSED
Initial Customer Contact:

Action: REQUEST CRM/SVC MGR TO CONTACT CUSTOMER
Dealer: 03857 SAYVILLE FORD Origin Desc: GENERAL CAC
Odometer: 5500 MI Comm Type: PHONE
Analyst Name: AINSLEY EDWARDS Analyst: AEDWARDS
Action Date: 08/09/1999 Action Time: 11.12.20.259 Action Data: No

Caller Information If Different From Vehicle Owner:

First Name	Middle Initial	Last Name	Day Phone	Relationship
RATEL		D'AMADEO	5167583312	SPOUSE

Comments CUSTOMER SAYS: CUST SAYS THAT SHE WOULD LIKE A FORD TECH. TO COME AND LOOK AT HER VEHICLE, AND REPAIR THE VEHICLE. PER CUSTOMER, DEALER SAYS: NONE CAC ADVISED: WE RECOMMEND THE REPAIR BE PERFORMED BY A FORD/LM DEALERSHIP. WOULD YOU LIKE FOR ME TO RECOMMEND A DEALERSHIP IN YOUR AREA? INFERENCE CASE ID: 4590

Action: ADVISE CUST INFO WILL BE SENT TO DLR; CONTACT CRM
Dealer: 03857 SAYVILLE FORD Origin Desc: US CONCERN CASE BASE
Odometer: 5500 MI Comm Type: PHONE
Analyst Name: AINSLEY EDWARDS Analyst: AEDWARDS
Action Date: 08/09/1999 Action Time: 11.12.20.259 Action Data: No

Caller Information If Different From Vehicle Owner:

First Name	Middle Initial	Last Name	Day Phone	Relationship
RATEL		D'AMADEO	5167583312	SPOUSE

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Action: CUSTOMER REFUSES TO HAVE WORK DONE
Dealer: 03857 SAYVILLE FORD Origin Desc: DEALER
Odometer: 5500 MI Comm Type: PHONE
Analyst Name: SAYVILLE FORD Analyst: F13103
Action Date: 09/02/1999 Action Time: 12.52.24.298 Action Data: No

Comments NO REPAIRS

ERIS-000-LC-2061

All Action Details for Issue

Print

VIN: 1FMPU18L5X[redacted] Year: 1999 Model: EXPEDITION Case: 431842009
Name: Owner Status: Original WSD: 1999-05-28
Symptom Desc: CLIMATE CONTROL AIR DIST/CONTROL Primary Phone:
Reason Desc: PROD/COMP DUR/PERF - VEHICLE QUALITY Secondary Phone:
Issue Type: 02 INFORMATION Issue Status: CLOSED

Action: REQUEST CRM/SVC MGR TO CONTACT CUSTOMER
Dealer: 09084 STEVEN'S FORD Origin Desc: GENERAL CAC
Odometer: 4800 MI Comm Type: PHONE
Analyst Name: TREVOR PLUMMER Analyst: TPLUMMER
Action Date: 07/21/1999 Action Time: 13.10.39.154 Action Date: No

Caller Information If Different From Vehicle Owner:

First Name	Middle Initial	Last Name	Day Phone	Relationship
ARQUEL		D'AMADEO		SPOUSE

Comments CUSTOMER SAYS: CUST STATES THAT A REGIONAL REP CONTACTED HER REGARDING A/C PROBLEM WITH VEH -WANTS TO KNOW IF CAN GET A NUMBER TO CONTACT HER PER CUSTOMER, DEALER SAYS: -NONE CAC ADVISED: - CRM/SERV MGR UNAVAILABLE - FORWARDED INFORMATION TO CRM/SERV MGR - REQUESTED CRM/SERV MGR CONTACT CUSTOMER WITHIN 2 BUSINESS DAYS INFERENCE CASE ID: 1546

Action: CB-ADVISE CUST INFO WILL BE SENT TO DLR; CONTACT CRM
Dealer: 09084 STEVEN'S FORD Origin Desc: US CONCERN CASE BASE
Odometer: 4800 MI Comm Type: PHONE
Analyst Name: TREVOR PLUMMER Analyst: TPLUMMER
Action Date: 07/21/1999 Action Time: 13.10.39.154 Action Date: No

Caller Information If Different From Vehicle Owner:

First Name	Middle Initial	Last Name	Day Phone	Relationship
ARQUEL		D'AMADEO		SPOUSE

Comments CUSTOMER SAYS: CUST STATES THAT A REGIONAL REP CONTACTED HER REGARDING A/C PROBLEM WITH VEH -WANTS TO KNOW IF CAN GET A NUMBER TO CONTACT HER PER CUSTOMER, DEALER SAYS: -NONE CAC ADVISED: - CRM/SERV MGR UNAVAILABLE - FORWARDED INFORMATION TO CRM/SERV MGR - REQUESTED CRM/SERV MGR CONTACT CUSTOMER WITHIN 2 BUSINESS DAYS INFERENCE CASE ID: 1546

Action: UPDATE CUSTOMER ADDRESS OR PHONE NUMBER
Dealer: 09084 STEVEN'S FORD Origin Desc: MANUAL - PHONE CSR
Odometer: 5000 MI Comm Type: PHONE
Analyst Name: RUTH SIMPSON Analyst: RSIMPSON
Action Date: 07/22/1999 Action Time: 14.15.24.733 Action Date: No

Caller Information If Different From Vehicle Owner:

First Name	Middle Initial	Last Name	Day Phone	Relationship
RAQUELL				SPOUSE

Comments CUSTOMER SAYS: THE CUST IS STILL HAVING AC PROBLEMS. SHE IS WAITING FOR THE REGIONAL REP OR

THE MANAGER AT THE DEALERSHIP TO CONTACT HER. THE DEALER IS CALLING OUT A FORD TECHNICIAN TO LOOK ATHE THE VEC. PER CUSTOMER, DEALER SAYS: NONE CAC ADVISED:

Action: UPDATE CUSTOMER ADDRESS OR PHONE NUMBER
Dealer: 09084 STEVEN'S FORD — **Origin Desc:** MANUAL - PHONE CSR
Odometer: 44800 MI — **Comm Type:** PHONE
Analyst Name: ASHA STANLEY — **Analyst:** ASTANLEY
Action Date: 07/22/1999 — **Action Time:** 17.14.25.521 — **Action Data:** No

Caller Information If Different From Vehicle Owner:

First Name	Middle Initial	Last Name	Day Phone	Relationship
RAQUEL		D'AMADEO		SPOUSE

Comments CUSTOMER SAYS: HAD VEH AT DLR 6 TIMES FOR AIR CONDITIONING CONCERN; CUST PICKED UP VEH ON JULY 20/99 STATING SHE IS STILL HAVING SAME PROBLEM; A/C IS NOT COOLING; CUST WAS TOLD BY REP THAT SOMEONE WOULD BE COMING IN TO LOOK AT VEH OUTSIDE OF DLRSHP WHICH IS WHAT SHE WANTS; A SPECIALIST/TECHNICIAN T PER CUSTOMER, DEALER SAYS: BRING VEH IN ON SAT AND WE WILL LOOK INTO ISSUE AGAIN CAC ADVISED: - MADE OBC TO DLR - SPOKE TO CORY MCKIBBIN - WAS NOT INFORMED BY REGION THAT SOMEONE WILL BE COMING TO LOOK AT VEH OUTSIDE OF DLRSHP, BUT WILL CALL REGIONAL REP TO SEE IF THAT CAN BE DONE AND CALL CUST BACK

Action: AWAITING ASSISTANCE - FIELD SERVICE ENGINEER
Dealer: 09084 STEVEN'S FORD — **Origin Desc:** FIELD ORGANIZATION
Odometer: 44800 MI — **Comm Type:** PHONE
Analyst Name: AYANA JAMES — **Analyst:** 7760AJ
Action Date: 07/23/1999 — **Action Time:** 16.19.17.819 — **Action Data:** No

Comments PER CSM: A FIELD SERVICE ENGINEER HAS BEEN CONTACTED TO COME OUT AND INSPECT VEHICLE. DEALERSHIP WILL BE ARRANGING APPT. WITH CUSTOMER FOR FSE TO INSPECT.

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[redacted]

May 6, 2005

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

- DOL - ??

Attn: Shawn Norton

Re: 63 claims relating to cruise control recall

Dear Ms. Norton:

As you will recall you and I spoke 4 weeks ago. I am the manager of a centralized unit that has been handling subrogation claims Nationwide has involving automobile fires and possible defects since September, 2004. We also have been handling these claims for our affiliate company Allied since February, 2005. You have had discussions on several claims with my associates Kathie Styer, Lynn Ellis and Lynn Koenck. Our goal has been to establish a positive working relationship with your company, and to only submit claims to your company having merit.

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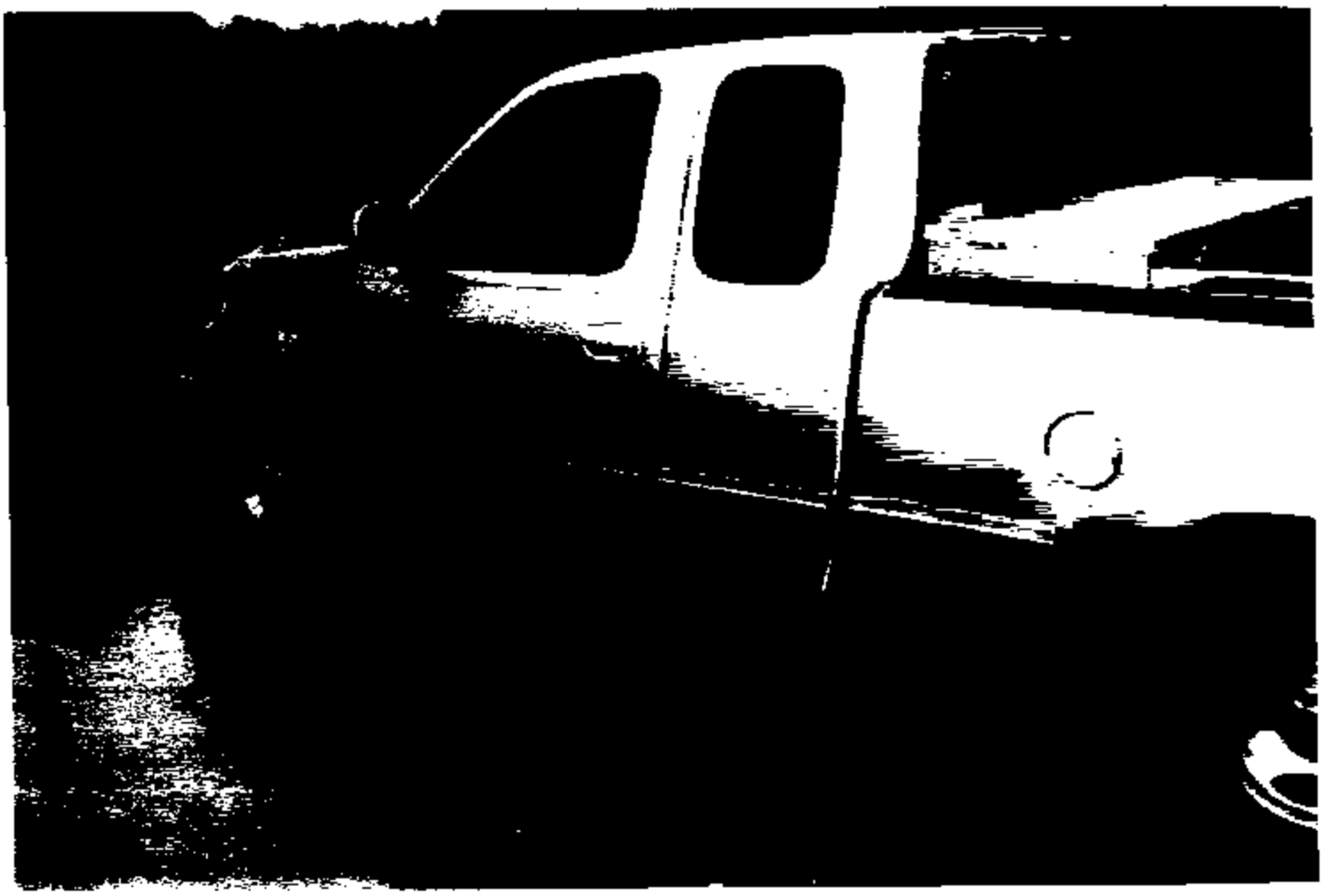
I would appreciate discussing this with you or someone at Ford once you have received this and have had an opportunity to review. Please contact me by phone at 315-453-3594, by fax at 614-961-3180 or by EMAIL at mabbetc@nationwide.com. We look forward to continue working with you and your team, building a strong working relationship, and working towards cost effective resolutions of claims for both of our companies.

Sincerely,

Craig Mabbett
Subrogation Manager



EA85-065-LC-2985

EA85-005-LC-2966

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May 6, 2005

[redacted]

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

DOL: 5/12/04

Attn: Shawn Norton

Re: 63 claims relating to cruise control recall

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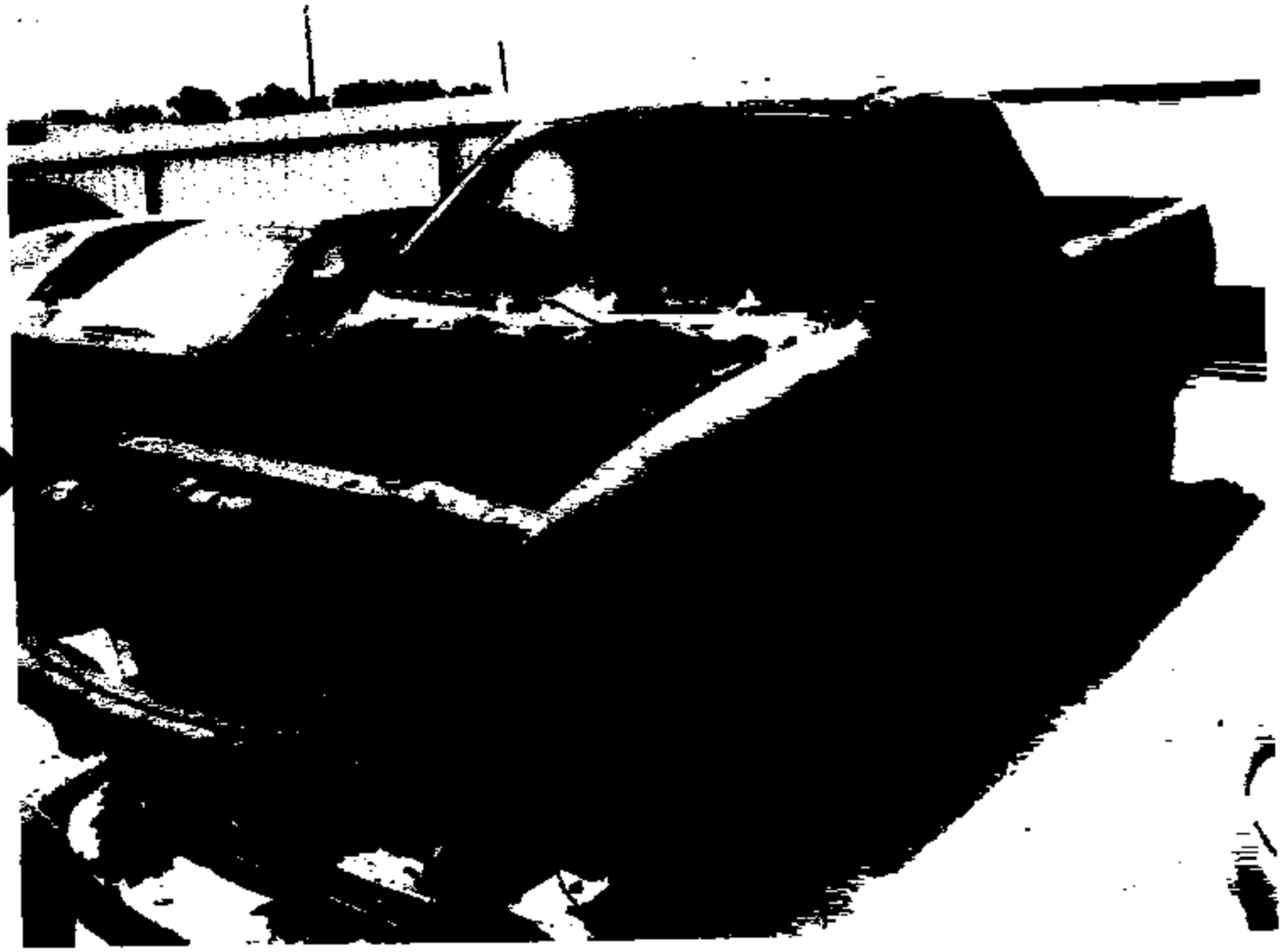
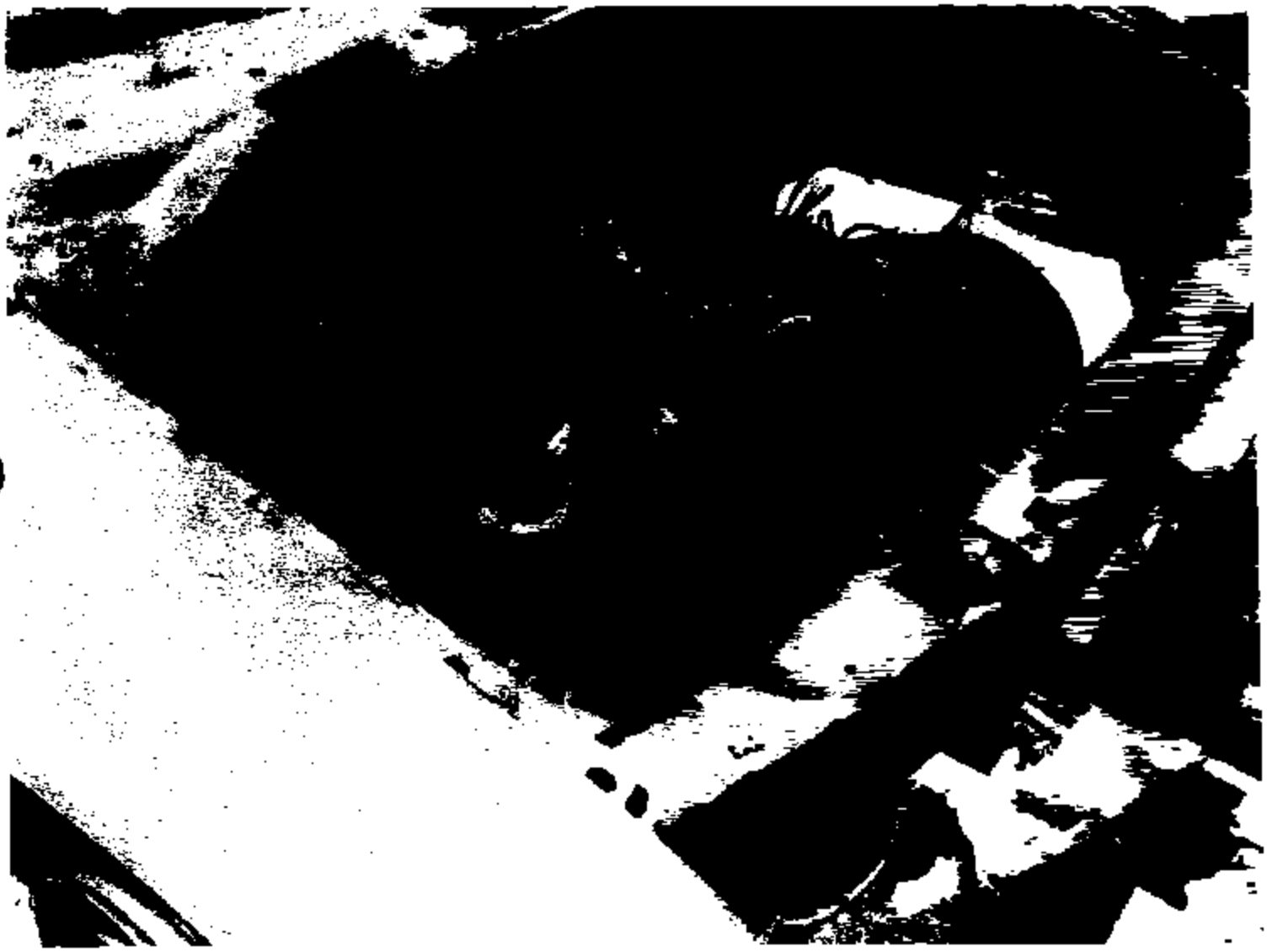


EA05-885-LC-2958

EA85-885-LC-2989



ER05-685-LC-2876

[redacted]

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May 6, 2005

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

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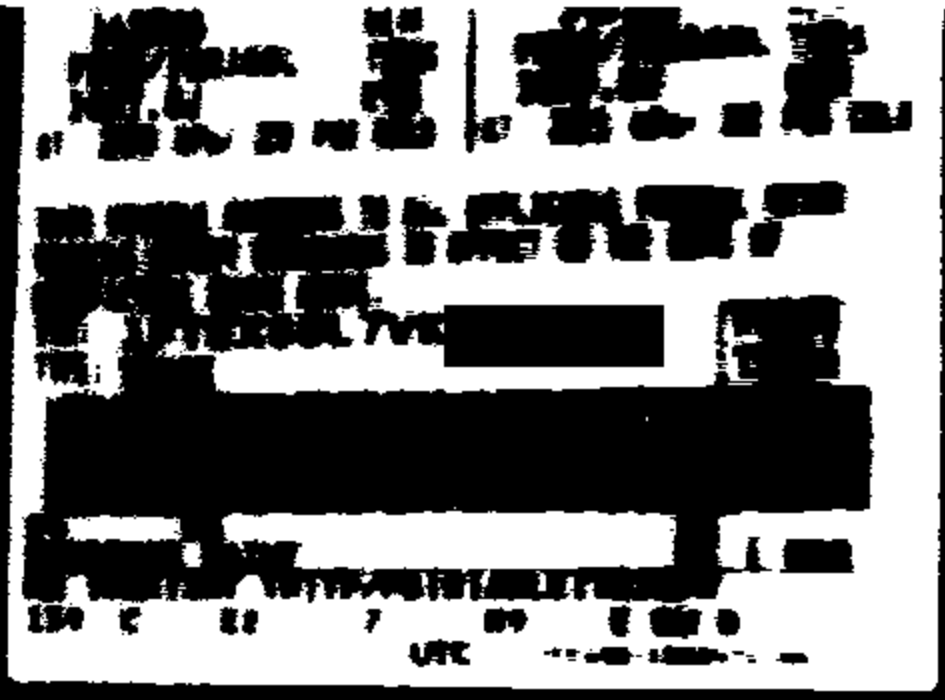
Sincerely,

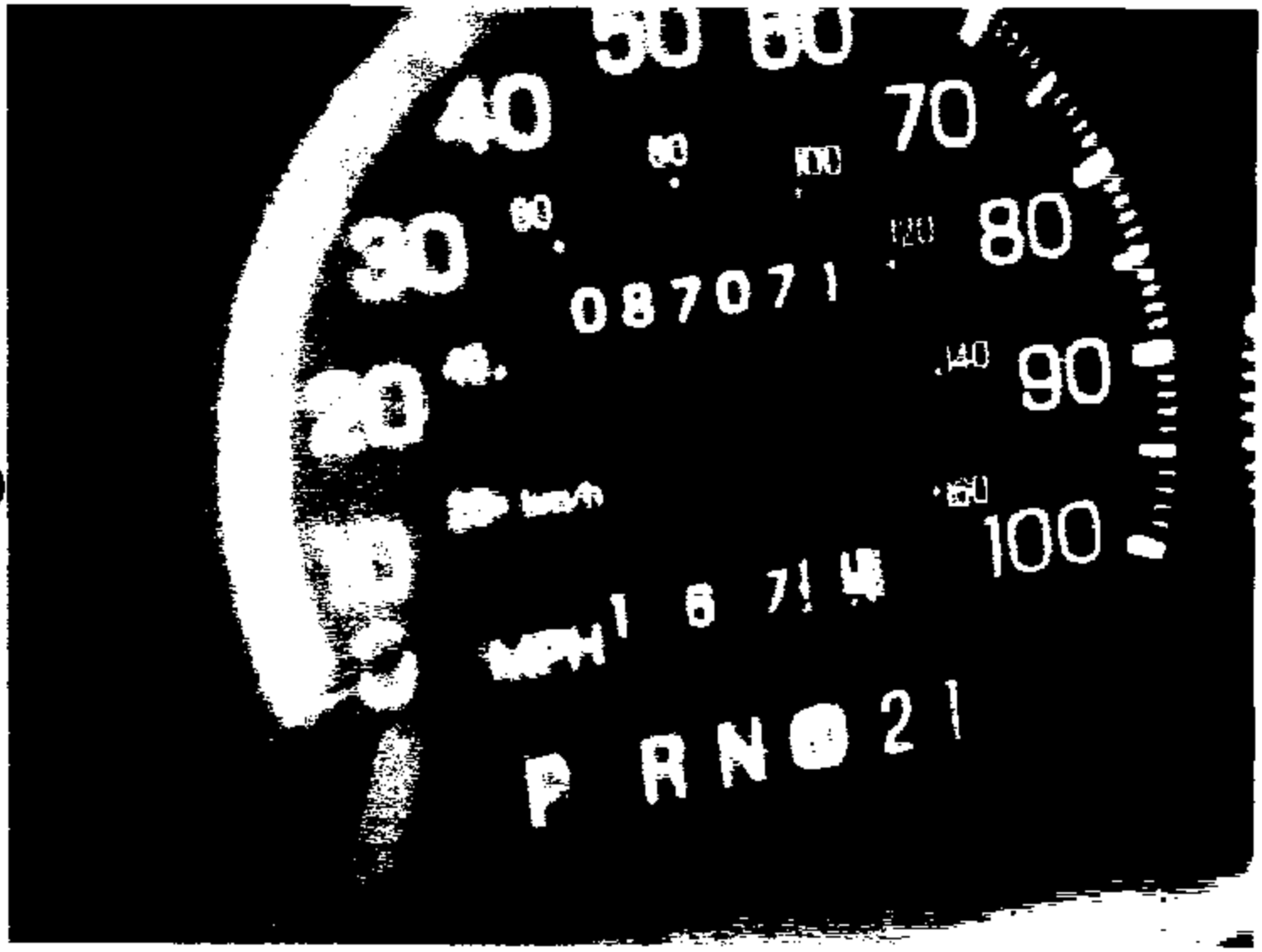
Craig Mabbett
Subrogation Manager

ER05-665-LC-2972

EA85-085-LC-2573



ER85-885-LC-2875



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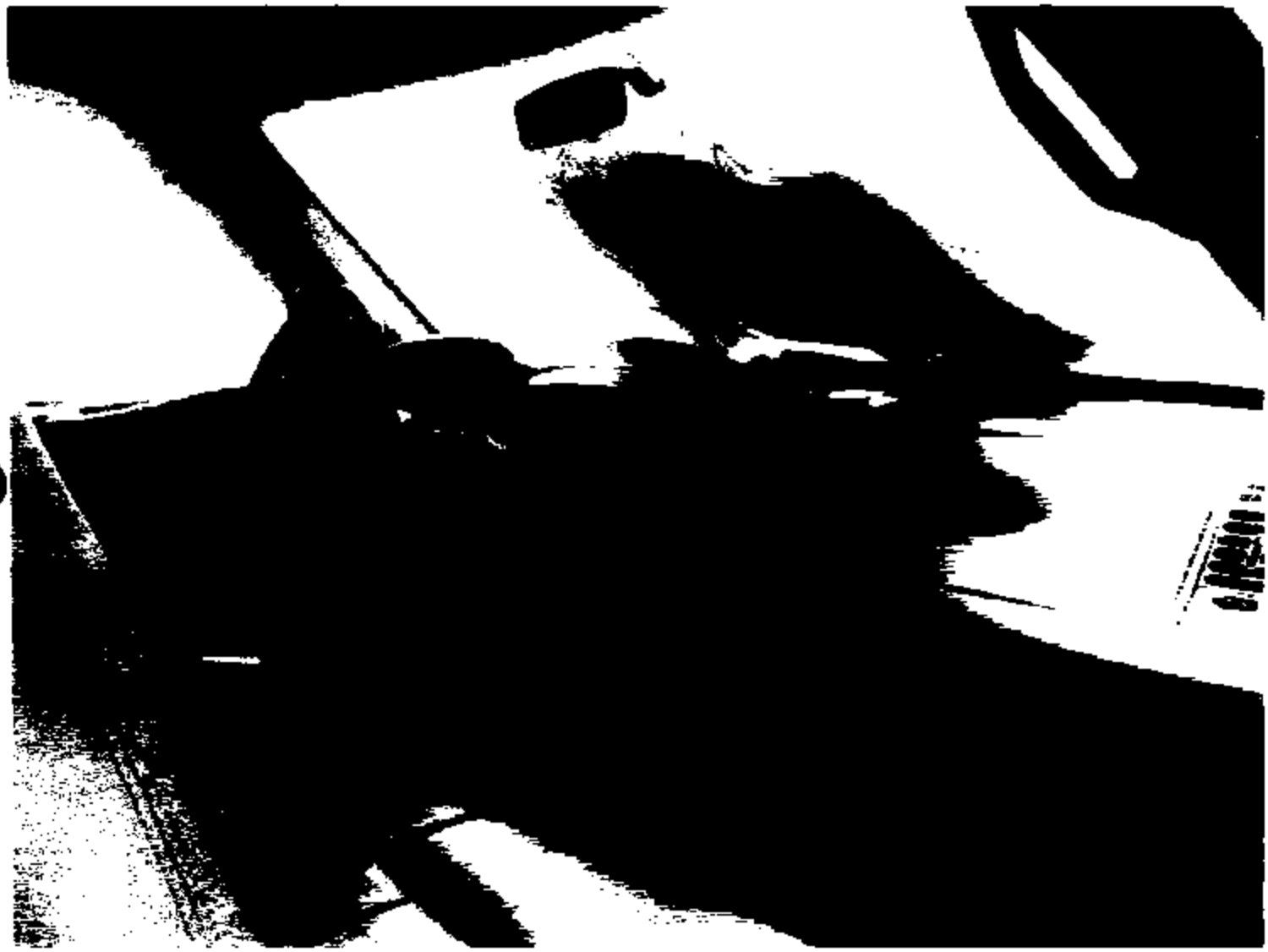
ER85-085-LC-2977



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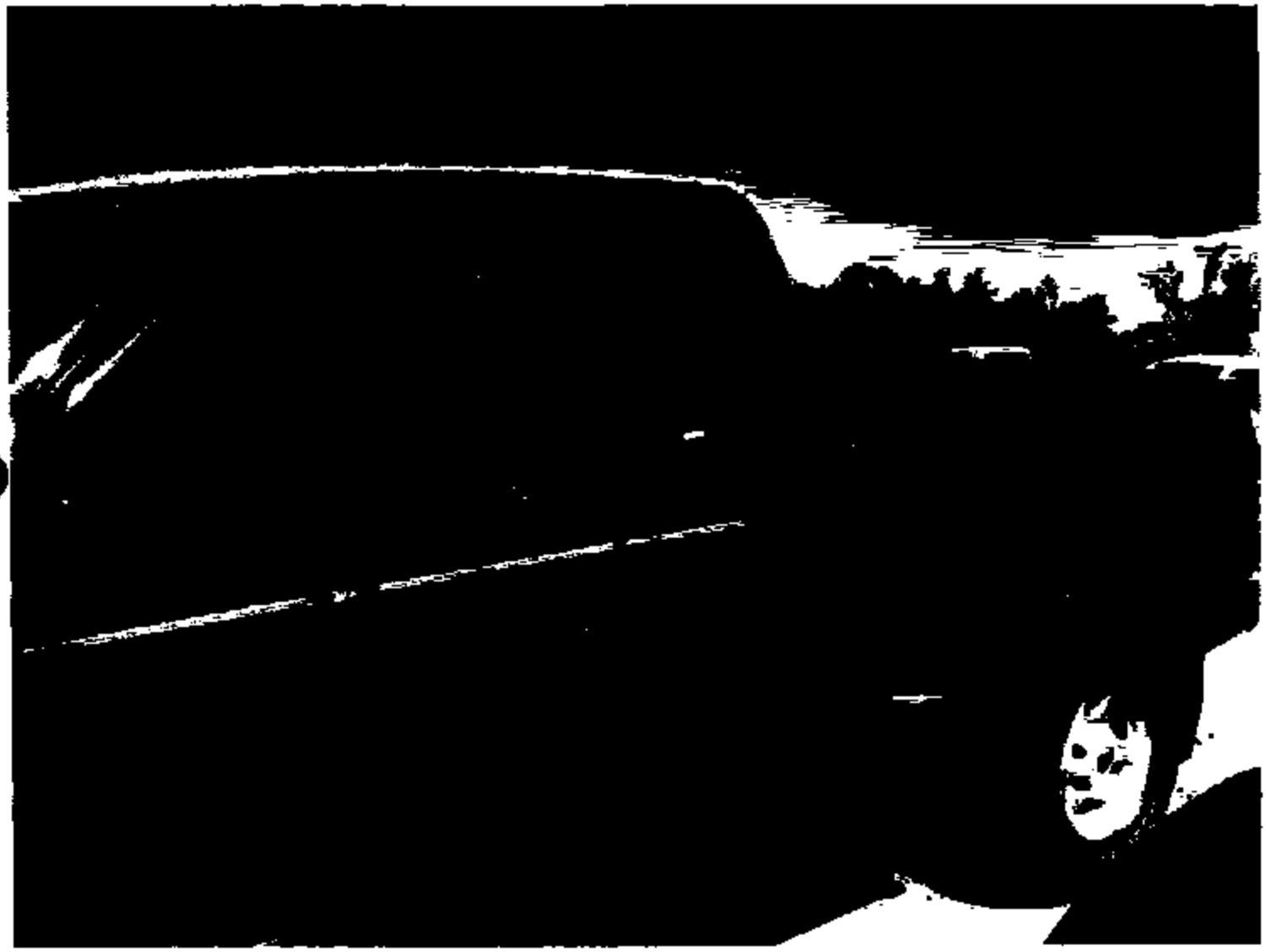
ER05-005-LC-2590

E805-005-LC-2881



EA85-085-LC-2882

E885-885-LC-2983

E905-005-LC-2964

[redacted]

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May 6, 2005

[redacted]

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

DOL : ?

Attn: Shawn Norton

Re: 63 claims relating to cruise control recall

F150

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Sincerely,

Craig Mabbett
Subrogation Manager

EN05-005-LC-2986

ER05-605-LC-2987

2905-005-LC-2988

ER95-065-LC-2969

E965-085-LC-2998

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May 6, 2005

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

Attn: Shawn Norton

Re: 63 claims relating to cruise control recall

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Sincerely,

Craig Mabbett
Subrogation Manager

All Action Details for Issue

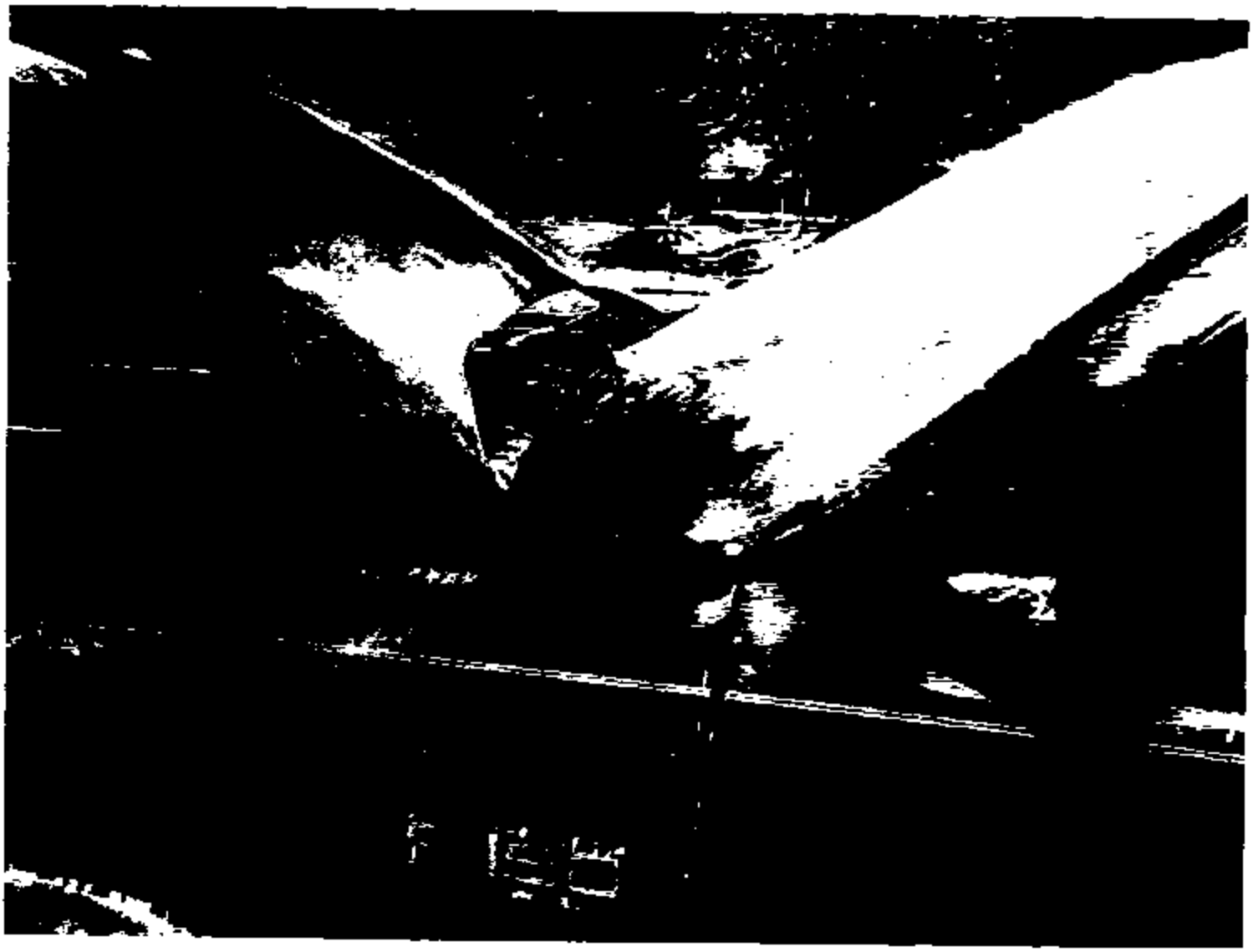
Print

VIN: 1FTRX07W2Y[redacted] Year: 2000 Model: F-SERIES Case: 1861571613
Name: [redacted] Owner Status: Original WSD: 2000-06-05
Symptom Desc: PAINT/FINISH APPEARANCE CRACKING Primary Phone: [redacted]
Reason Desc: AWA - AWA DENIED Secondary Phone: [redacted]
Issue Type: 02 INFORMATION Issue Status: CLOSED

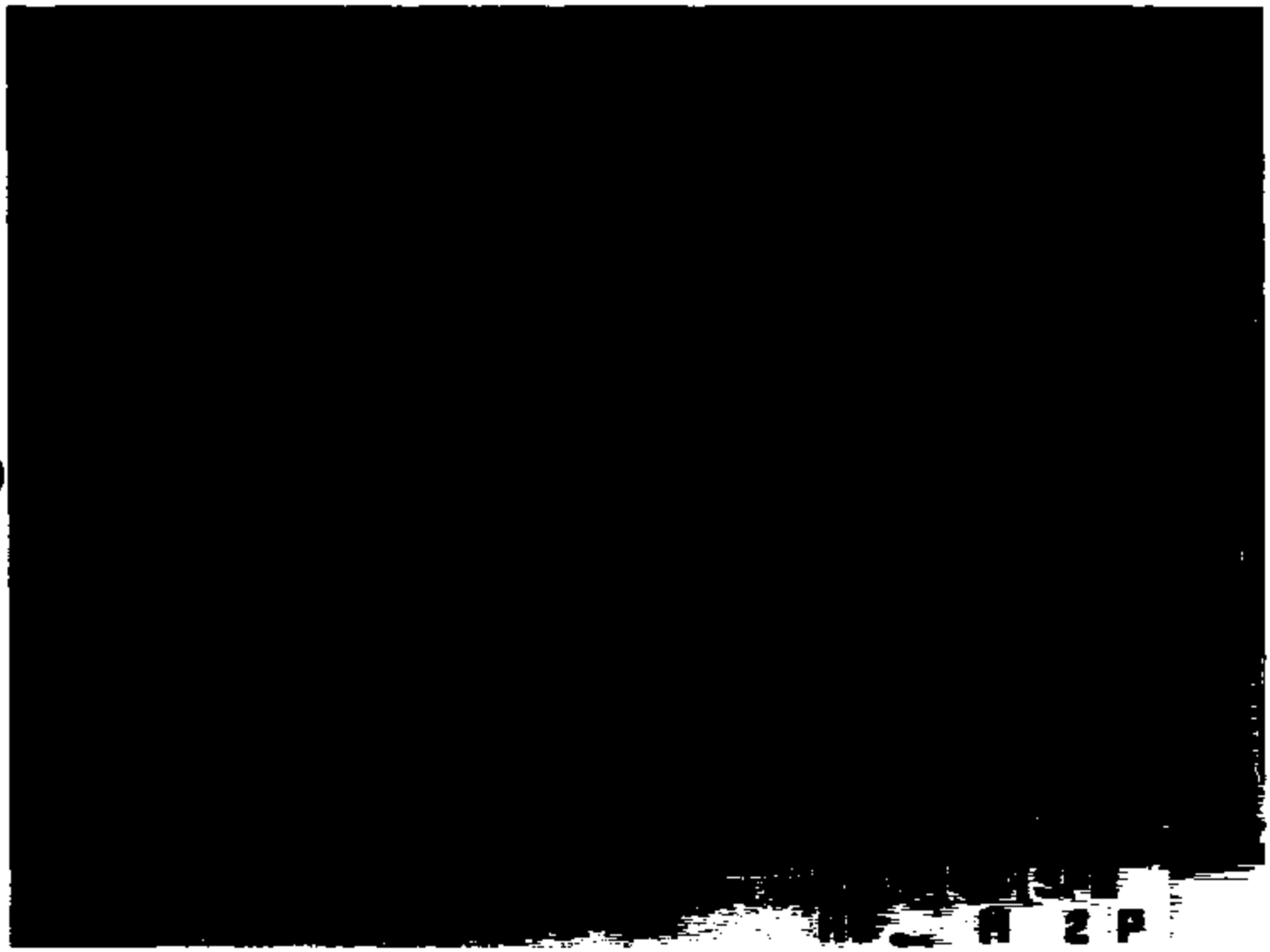
Action: ADVISE CUST VEHICLE IS BEYOND WARRANTY; NO ASSISTANCE
Dealer: Origin Desc: US CONCERN CASE BASE
Odometer: 85000 MI Comm Type: PHONE
Analyst Name: TSULTIM NAWANG Analyst: TNAWANG
Action Date: 06/10/2003 Action Time: 18.56.17.556 Action Date: No

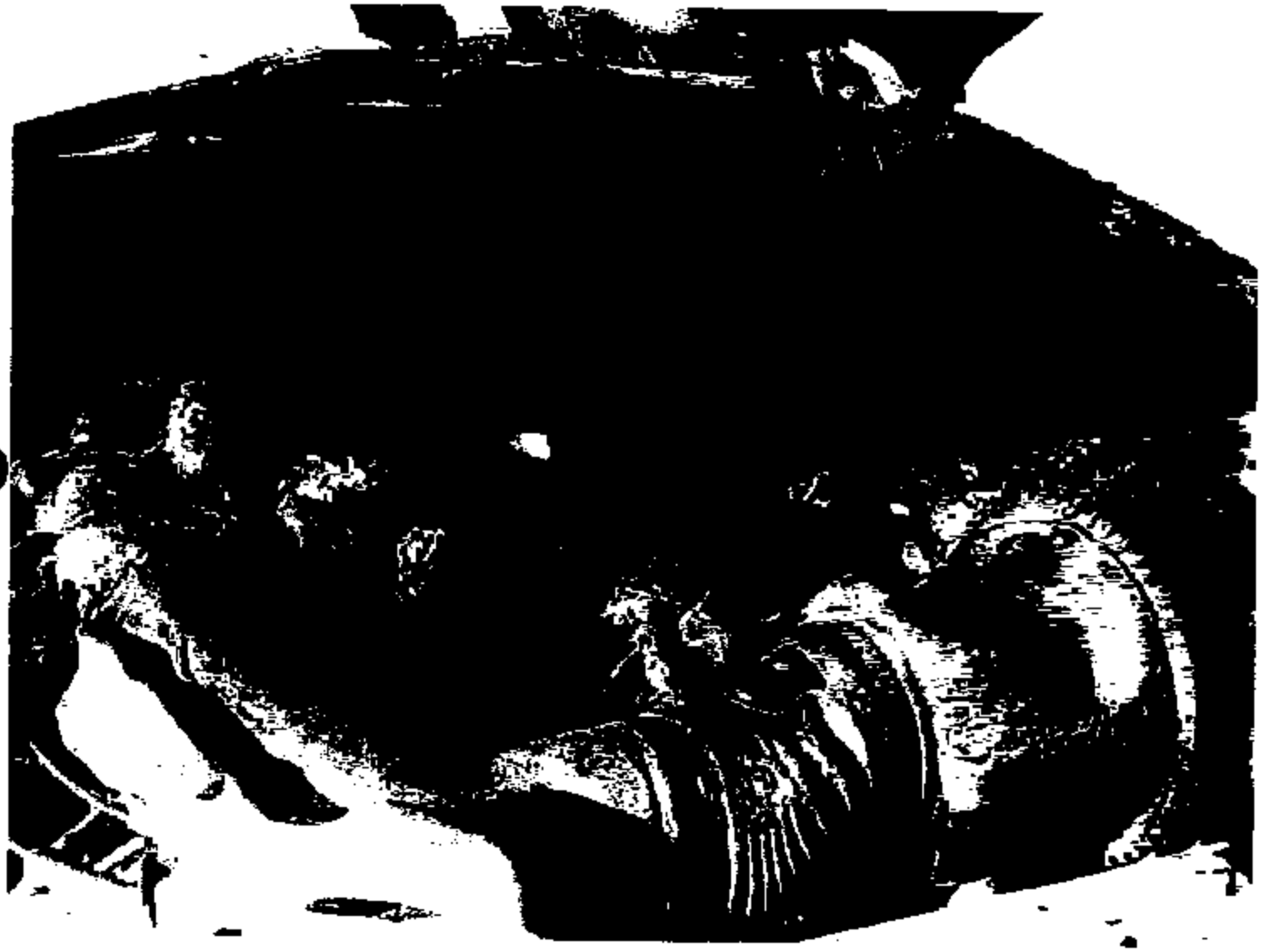
Comments CUSTOMER SAYS: CUST SAID THERE IS A PAINT CONCERN-- CUST SAID IT IS ON THE ROOF ON THE DRIVER'S SIDE - IT IS ALSO ON THE REAR DRIVERS SIDE-- IT IS CRACKED AND PEELING ALSO-- CUST NOTICED THE PAINT WHILE WASHING IT-- CUST IS LOOKING FOR ASSISTANCE-- PER CUSTOMER, DEALER SAYS: IT IS OUT OF WARRANTY-- CAC ADVISED: - I HAVE REVIEWED YOUR SITUATION AND UNFORTUNATELY THERE ARE NO WARRANTIES OR PROGRAMS ON YOUR VEHICLE THAT MIGHT PROVIDE COVERAGE FOR YOUR CONCERN. WHILE WE WOULD NOT BE ABLE TO PROVIDE YOU WITH ANY FINANCIAL ASSISTANCE,I WOULD ADVISE YOU TO HAVE YOUR VEHICLE INSPECTED AT A CERTIFIED F/L/M DEALERSHIP AS THEIR TECHNICIANS SPECIALIZE IN THE REPAIR AND CARE OF F/L/M VEHICLES ADVISED CUST THAT THE DOCUMENTATION WILL BE FORWARDED TO THE ENGENEERING DEPT AND IF THE CUST RECE ANY CSP FOR THIS CONCERN, HE CAN SUBMIT HIS RECEIPTS FOR A POSSIBLE REFUND-- INFERENCE CASE ID: 5618

E995-005-LC-2595



E095-069-LC-2896





2A08-005-LC-2303

EA03-005-LC-2999

ER65-005-LC-3880

ER05-005-LC-3001