



OHIO FIRE INCIDENT REPORTING SYSTEM

INCIDENT REPORT

APR 17 2000

1  DELETE  
2  CHANGE

Fire Department

SVFD Stockport

<b>A</b>	FORM NO	INCIDENT NO	EXP	MO	DAY	YEAR	DAY OF WEEK	4-Weather 5-Thunder 6-Freeze	ALARM TIME	ARRIVAL TIME	TIME IN SERVICE																																								
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<b>B</b>	<table border="1"> <tr> <td>11-Structure Fire</td> <td>22-Air Gas Rupture</td> <td>44-Power outages</td> <td>55-Animal Poles</td> <td>72-Score Scans</td> </tr> <tr> <td>12-Damaged Down Lines</td> <td>23-Emergency Medical call</td> <td>45-Airport electric equipment</td> <td>56-Unattended burning</td> <td>73-Alarm Malfunction</td> </tr> <tr> <td>13-Vehicle Fire</td> <td>24-Locked or trapped</td> <td>46-Aircraft standby</td> <td>57-Alarm test</td> <td>74-Unknown alarm cause</td> </tr> <tr> <td>14-Bush grass, leaves</td> <td>25-Cancellation</td> <td>47-Chemical spill</td> <td>58-Other service calls</td> <td>75-Unclassified</td> </tr> <tr> <td>15-Vegetation</td> <td>26-Exhaustion</td> <td>48-Link-out</td> <td>59-Score scans</td> <td>76-Other</td> </tr> <tr> <td>16-Explosion on gas pipe</td> <td>27-Spark from fire</td> <td>49-Storage removal</td> <td>60-Corrosive burn</td> <td>77-See page 17-18</td> </tr> <tr> <td>17-Outside wall with fire</td> <td>28-Explosive, stored removal</td> <td>50-Smoke odor removal</td> <td>61-30000 gas meter for smoke</td> <td></td> </tr> <tr> <td></td> <td>29-Excessive heat</td> <td>51-Aerial rescue</td> <td>62-Miscellaneous</td> <td></td> </tr> </table>											11-Structure Fire	22-Air Gas Rupture	44-Power outages	55-Animal Poles	72-Score Scans	12-Damaged Down Lines	23-Emergency Medical call	45-Airport electric equipment	56-Unattended burning	73-Alarm Malfunction	13-Vehicle Fire	24-Locked or trapped	46-Aircraft standby	57-Alarm test	74-Unknown alarm cause	14-Bush grass, leaves	25-Cancellation	47-Chemical spill	58-Other service calls	75-Unclassified	15-Vegetation	26-Exhaustion	48-Link-out	59-Score scans	76-Other	16-Explosion on gas pipe	27-Spark from fire	49-Storage removal	60-Corrosive burn	77-See page 17-18	17-Outside wall with fire	28-Explosive, stored removal	50-Smoke odor removal	61-30000 gas meter for smoke			29-Excessive heat	51-Aerial rescue	62-Miscellaneous	
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<b>F</b>	OCCUPANT NAME																																																		
<b>G</b>	OWNER NAME																																																		
<b>H</b>	METHOD OF ALARM																																																		
<b>I</b>	NO. FIRE SERVICE PERSONNEL RESPONDED																																																		
<b>J</b>	COMPLEX Pg 61-62																																																		
<b>K</b>	AREA OF FIRE ORIGIN Pg 57-68																																																		
<b>L</b>	FORM OF HEAT IGNITION Pg 74-78																																																		
<b>M</b>	METHOD OF EXTINGUISHMENT																																																		
<b>N</b>	NUMBER OF STORIES																																																		
<b>O</b>	EXTENT OF DAMAGE																																																		
<b>P</b>	TYPE OF MATERIAL GENERATING MOST SMOKE Pg 103-104																																																		
<b>Q</b>	FORM OF MATERIAL GENERATING MOST SMOKE Pg 108-109																																																		
<b>R</b>	IF MOBILE PROPERTY																																																		
<b>S</b>	IF EQUIPMENT INVOLVED IN IGNITION																																																		
<b>T</b>	MEMBER MAKING REPORT																																																		
<b>U</b>	DATE																																																		

OFFICE OF THE GENERAL COUNSEL

13

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4

5

1

9

1

1

9

Remarks

April 6, 2000



[Redacted]

Stockport, OH [Redacted]

Ref: Our Claim No.: [Redacted]

Date of Loss: January 28, 2000

Dear [Redacted]

In order to attempt subrogation against Ford Motor Company and for Ford to properly evaluate this claim, the following documents and information will be needed:

1. Any official police and/or fire report on this matter. *Fire Report*
2. The vehicle operators' statement describing this incident. Names, addresses and telephone numbers of witnesses to the event, along with their statements. (Grange has your statement on file)
3. Did the vehicle owner and/or operator note anything wrong or unusual about the vehicle prior to the accident? *See statement on page 3 - bottom*
4. Location of vehicle at time that fire broke out *driving down State Route 376*
5. What was the first sign or indication that there was a problem with the vehicle?  
*See statement page 3 - top*
6. Copies of all maintenance, warranty, or repair orders on the subject vehicle. If repairs and maintenance were performed by the vehicle owner, then a chronological summary of operations performed is needed.
7. Was any after-market equipment installed on the subject vehicle? *yes*  
If so, provide copies of receipts and/or invoices for installation of said equipment.  
*mud flaps, bug guard.*
8. Were there any modifications, alterations, or changes to the subject vehicle? *No*  
If so, provide copies of relevant installation receipts.
9. Did the vehicle owner receive any Recall Notices for the subject vehicle? *No*

EQS-018-10-0072



10. The description of any items that were being transported by the subject vehicle at the time of this incident. *None*
11. Was the vehicle involved in any prior accidents? *No*  
If so, identify the nature and extent of damages and repairs completed.  
Supply repair orders and photographs depicting damage sustained.
12. Was the vehicle purchased new or used? *New*

Your cooperation in providing the above requested documents and information would be greatly appreciated.

I have not received the information requested. Please send, as soon as possible.

Sincerely,

Helen Patterson  
Subrogation Examiner  
[pattersonh@grangeinsurance.com](mailto:pattersonh@grangeinsurance.com)

Phone No: 800-422-0550 ext: 2642

2003-2005-10-0073

NAME INSURED [REDACTED]  
CLAIM NUMBER [REDACTED]

THIS IS ALICIA SPENCER CALLING FROM COLUMBUS, OH. MY TELEPHONE NUMBER IS 614-337-4400. TODAY'S DATE IS FEBRUARY 1, 2000. THE TIME IS APPROXIMATELY 5:19 P.M. I'M SPEAKING WITH [REDACTED] AT TELEPHONE NUMBER [REDACTED] CONCERNING AN INCIDENT WHICH OCCURRED ON 1/28/2000 IN STOCKPORT, OH.

Q. [REDACTED] do you realize this interview is being recorded?

A. Yes.

Q. Do I have your full acknowledge and consent?

A. Yes.

Q. Would you state your full name spelling your last name?

A. [REDACTED]

Q. Your address and telephone number?

A. It's [REDACTED] Stockport, OH. The phone number is [REDACTED]

Q. And how long have you lived at that address?

A. Fifteen years.

Q. The date of birth?

A. [REDACTED]

Q. SS#?

A. [REDACTED]

Q. Are you employed?

A. Yes.

Q. Who are you employed with?

A. Operating Engineers Local 18.

Q. How long have you been employed there?

A. 2 years right now.

Q. Who's the titled owner of the vehicle?

- A. I am.
- Q. Just your name, your name only?
- A. Yes.
- Q. When did you purchase the vehicle?
- A. I think it was February. The last part of February of 99. I don't remember the exact date. I could find out here in a minute.
- Q. That's ok if you don't remember the exact date. Around about is fine. Where did you purchase the vehicle from?
- A. Ricart Ford in Columbus.
- Q. Do you remember how much you paid for the vehicle?
- A. It was \$24,000 something.
- Q. Does it currently have a loan on it?
- A. Yes.
- Q. To attain the vehicle did you do a trade in or anything?
- A. No.
- Q. So you just financed the full amount?
- A. Right.
- Q. What was the date and time of the fire?
- A. The date was January 28<sup>th</sup> and I left for work approximately 20 after 4 a.m. and I got probably five mile up the road and I don't remember, you know, however long it takes to get there. So probably around 4:30 to 20 until 5 something like that.
- Q. Where were you at the time of the fire. What street were you on?
- A. I was on State Route 376.
- Q. Is that in Stockport?
- A. Well it would be north of Stockport going. It was between Stockport and McConnelsville.
- Q. Was there anyone with you at the time of the fire?

A. No.

Q. Could you tell me what happened?

A. Well smoke started coming up in the cab. And I knew there was a wide spot in the road. It was probably 1/8 of a mile or less. I don't know exactly how far. I pulled off there and when I opened the door fire come up between the, up in the, between the door and the cab. Out from like the fender well. And I got out and went around and grabbed my thermos. And had a cup of coffee in there and I threw that but that didn't do any good. So I got my cellular phone out and called the fire department. But the number kept saying, I dialed it once and it said your number cannot be completed as dialed. So I hung up again and dialed 740 the fire number, the fire department number. It came up your number cannot be completed as dialed so then I punched it and then I called the sheriffs department. And then they called the fire department. And one of the guy's on the Fire department lived probably, maybe a half mile or 3/4 of a mile from there. He came down and he had a fire extinguisher in his truck. And he got part of it out. But then he ran out of stuff in his fire extinguisher. Then the fire department arrived probably, I don't know for sure exactly, probably ten minutes or less after that.

Q. Were there any flammable material in the vehicle at the time?

A. No.

Q. Had you done any recent repairs or any work on the vehicle?

A. No. Just changed the oil in it.

Q. Where do you normally have the vehicle serviced?

A. I do it myself. I change my oil every 3,000 mile.

Q. Were there any mechanical defect's with the vehicle?

A. No.

Q. Any electrical defect's with the vehicle?

A. I called Ricart's and set up an appointment to take it in the first, that would be Tuesday the 1<sup>st</sup> to get it checked. I had trouble when you got in it in the morning or when it set like over night your inside light's didn't work, your power window's didn't work, your door lock's didn't work and your power mirror's didn't work. And I had it scheduled to go in today to get it checked.

Q. How long had that been going on?

A. The first time that it done it I called them.

Q. Ok about you know a week prior?

A. Yeah I'd say a week. I don't remember exactly what day I did call up to schedule the appointment.

Q. Ok. But other than that did you have any other problems with the vehicle?

A. No.

Q. What type of engine is in the vehicle?

A. It's got 4.2 V6.

Q. What type of transmission is in the vehicle?

A. It's an automatic over drive.

Q. The condition of the exterior of the vehicle?

A. Excellent. It's a brand new truck.

Q. The condition's of the tires?

A. Good.

Q. The condition of the exhaust system?

A. Good. Excellent you might as well say. The trucks not a year old.

Q. Were there any other problems with the vehicle?

A. No.

Q. Have you had any problems with anyone?

A. No.

Q. Do you or your wife smoke?

A. Yes.

Q. Were you or anyone else in the vehicle. Smoking in the vehicle?

A. At that time no.



- Q. Had you had any theft's or vandalism on the vehicle?
- A. No.
- Q. Do you have any other insurance on the vehicle?
- A. No.
- Q. Were you planning on selling the vehicle?
- A. No.
- Q. Has the vehicle ever been offered for sale?
- A. Has it ever been offered for sale?
- Q. Right. While it was in your possession has anyone ever offered to sell it. Sorry I'm getting confused. Have you ever offered to sell the vehicle to anyone?
- A. No. Now I went back to Ricart here a while, probably, I don't know how long ago and was talking to them about trading it in for an extended cab. But then we couldn't work out a deal so I didn't do it.
- Q. Can you think of any reason that would have caused the vehicle to catch on fire?
- A. I would say it had to be in the electrical system. That's where it you know. Because when I opened the door the wire's that goes through in from the door in to the fender well. That's where the fire was coming out of that hole where the tube goes through.
- Q. Were there any valuables or special equipment in the vehicle?
- A. Just the cellular phone. But I took it out when I called the fire department.
- Q. Who do you have your loan with on the vehicle?
- A. Household.
- Q. Is it Household Finance?
- A. Right.
- Q. What are your monthly payments?
- A. \$549.00

- Q. Are you current on your payments?
- A. Yes.
- Q. Do you have any outstanding liens or judgement against you?
- A. No.
- Q. And how did you get home from the fire?
- A. The guy that was on the fire department that lived up the road that came down with his fire extinguisher took me on back home.
- Q. Have you understood all of my questions?
- A. Yes.
- Q. Were all your answers true and correct to the best of your knowledge?
- A. Yes.
- Q. Do you understand this interview is being recorded?
- A. Yes.
- Q. Ok. Today's date is February 1, 2000 the time is approximately 5:28 p.m. We have concluded this interview and unless you have any objections I will turn off the recorder?
- A. Ok.

TSS/W.Aliberry/4-19-2000

# O. C. A. Consultants, Inc.

ORIGIN - CAUSATION - ANALYZATION

Corporate Office  
P.O. Box 43248  
Cincinnati, Ohio 45243  
(513) 578-8228

Satellite Office  
P.O. Box 819  
Cantonburg, Ohio 43115  
(740) 825-9854  
(800) 566-1882  
FAX: (740) 825-9852

February 29, 2000

Ms. Lisa Spencer  
Grange Mutual Casualty Company  
PO Box 30964  
Columbus, Ohio 43230

Re: Summary Report  
Fire Analysis  
1999 Ford F150 Pickup Truck  
Insured: [REDACTED]  
Your Claim: [REDACTED]  
OCA File #00-2426  
Date of Occurrence: January 28, 2000  
Reported at Approximately: 4:30 PM

## THIS IS A CONFIDENTIAL COMMUNICATION BETWEEN AGENT AND PRINCIPAL

OCA Consultants, Inc. was requested on February 2, 2000, by Ms. Lisa Spencer of Grange Mutual Casualty Company, to examine and determine the cause of a fire that occurred in a Ford truck owned by [REDACTED]. The fire occurred on January 28, 2000, at about 4:30 AM. [REDACTED] was travelling to his place of employment and had been on the road for only a few miles.

He noticed smoke and, upon stopping, he found flames at the driver's door.

Fifteen photographs and computer check by the dealer showing no recalls are included with this report.

The vehicle was examined on February 9, 2000, by OCA Engineer/ Fire investigator Bernard Doran. The vehicle had been towed to Clewell Ford in Cambridge, Ohio, located at 1023 Wheeling Avenue. It was stored outside in an area referred to as the "bullpen," and this is where it was examined.

The examination of the truck started with verification of the VIN, that number was found to be 1FTZF1827XA [REDACTED]. The truck was a 1999 Ford model F-150. It had a standard cab and eight-foot bed. The exterior of the vehicle is shown in Figures 1



Figure One  
Truck (Front)



Figure Two  
Passenger Side



Figure Three  
Truck (Rear)



Figure Four  
Driver's Side

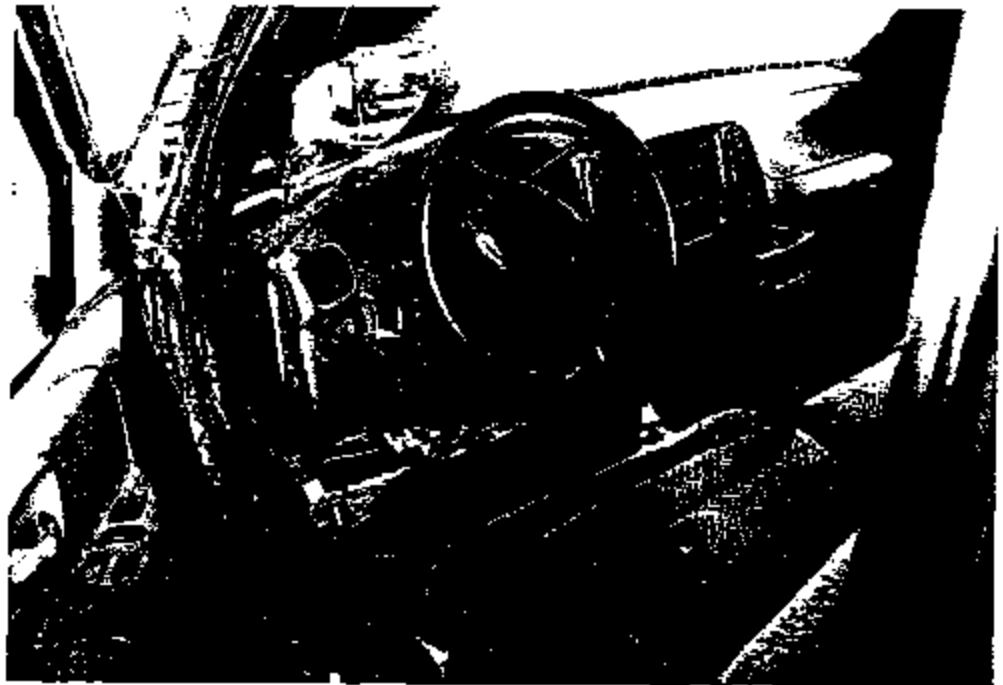


Figure Five  
Interior of Cab



Figure Six  
Engine Compartment as Seen From Front



Figure Seven

Passenger Side of Engine Compartment



Figure Eight

Driver's Side of Engine Compartment - Taken From the Fender



Figure Nine

Close-up of Area of Greatest Damage Located Near Firewall on Driver's Side



Figure Ten

Power Distribution Block





Figure Eleven  
Power Distribution Block



Figure Twelve  
Power Distribution Block Showing Main Copper Supply Cable to the Block



Figure Thirteen  
Engine Compartment of Exemplar Truck

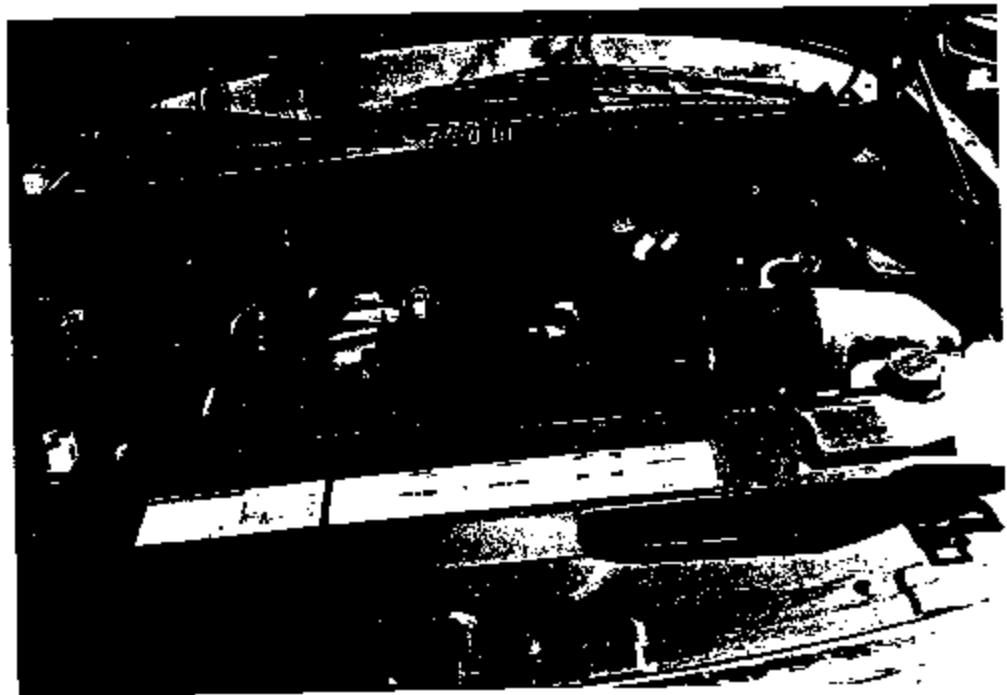


Figure Fourteen  
Engine Compartment of Exemplar Truck



Figure Fifteen

Engine Compartment of Exemplar Truck

IN THE MORGAN COUNTY COURT OF COMMON PLEAS

[REDACTED]  
Columbus, Ohio [REDACTED]

Plaintiff,

Case No: 25,540  
Judge

vs.

Ford Motor Company  
c/o C.T. Corporation System, Statutory Agent  
1300 East 8th Street  
Cleveland, Ohio 44114

Defendant.

COMPLAINT FOR DAMAGES

FILED  
AUG 27 AM 10 04  
MORGAN COUNTY COURT  
COLUMBUS, OHIO

COUNT ONE

1. The corporate Plaintiff is duly authorized to sell insurance in the state of Ohio and at all times hereinafter mentioned, had in full force and effect a policy of insurance issued to William Albery (hereinafter referred to as the "Insured").
2. Defendant Ford Motor Company (hereinafter referred to as "Ford") is a corporation authorized to do business in the state of Ohio, or has conducted business in the state of Ohio.
3. Defendant, Ford, negligently designed, manufactured, distributed, marketed and/or sold a 1999 Ford F-150, bearing Vehicle Identification Number 1FTZF1827X [REDACTED]
4. On or about the 28<sup>th</sup> day of January, 2000, in Stockport, Morgan County, Ohio, the "Insured" was using said 1999 Ford F-150 in a foreseeable manner when an electrical fire did originate in and/or around the power distribution block.

*Sullyman*

5. As a result of the fire, the Insured's 1999 Ford F-150 was damaged beyond repair and was deemed a total loss. Its value preceding the incident was in an amount in excess of \$21,428.07.

6. Said fire and loss were a direct and proximate result of Defendant's aforementioned negligence.

7. Pursuant to the above mentioned policy of insurance, the corporate Plaintiff was required to and did pay to and/or on behalf of its "Insured" the sum of \$21,428.07 and is thereby subrogated in that amount.

#### COUNT TWO

8. Plaintiff hereby incorporates paragraphs one through seven of this Complaint as if fully restated herein.

9. Defendant negligently failed to warn of the dangers of said product.

#### COUNT THREE

10. Plaintiff hereby incorporates paragraphs one through nine of this Complaint as if fully restated herein.

11. Said product was unsafe for its intended use, which use was reasonably foreseeable by Defendant.

#### COUNT FOUR

12. Plaintiff hereby incorporates paragraphs one through eleven of this Complaint as if fully restated herein.

13. Defendant made certain express and implied warranties which were relied upon by the "Insured", the Defendant's breach of which directly and proximately caused the damages described above.

**COUNT FIVE**

14. Plaintiff hereby incorporates paragraphs one through thirteen of this Complaint as if fully restated herein.

15. The risks inherent in the design of the 1999 Ford F-150 outweighed the benefits of that design.

**COUNT SIX**

16. Plaintiff hereby incorporates paragraphs one through fifteen of this Complaint as if fully restated herein.

17. Defendant did fail to design and/or manufacture said 1999 Ford F-150 in conformity with the standards and requirements of its industry.

**COUNT SEVEN**

18. Plaintiff hereby incorporates paragraphs one through seventeen of this Complaint as if fully restated herein.

19. Defendant did place into the stream of commerce a product which was not of merchantable quality and was unfit for the purpose in which it was intended.

**COUNT EIGHT**

20. Plaintiff hereby incorporates paragraphs one through nineteen of this Complaint as if fully restated herein.

21. The 1999 Ford F-150 was defective in manufacture and/or construction as described in Ohio Revised Code § 2307.74, was defective in design or formulation as described in Ohio Revised Code § 2307.75, was defective due to inadequate warning or instruction as described in Ohio Revised Code § 2307.76 and/or was defective because it did not conform to representations made by the Defendant as described in Ohio Revised Code § 2307.77.

22. As a direct and proximate result of one or more of the above described failures and/or defective and dangerous conditions, Plaintiff and Plaintiff's "Insured" were damaged as set forth above.

WHEREFORE, [REDACTED] demands judgment in the amount of \$21,428.07, plus costs and interest.

CHEEK & ZEEHANDER, LLP.

BY: 

Alessandro Sabatino, Jr. (0062406)  
Attorney for Plaintiff  
471 East Broad Street, 18th Floor  
P.O. Box 15069  
Columbus, Ohio 43215-0069  
(614) 229-3868 (01-343)

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SUITE 2200 SUNTRUST PLAZA 303 PEACHTREE STREET, NE ATLANTA, GA 30308-3264  
404.572.2000 800.890.1393 404.572.2199 FAX www.cozen.com

October 16, 2001

**VIA FEDERAL EXPRESS**

Shawn L. Norton  
Claims Analyst  
Ford Motor Co.  
Parklane Towers West  
Suite 300, Three Parklane Blvd.  
Dearborn, MI 48126-2568

RE: Insured : [REDACTED]  
Date of Loss : 06/28/00  
Claim No. : [REDACTED]  
Our File No. : TBA

Dear Shawn:

Please allow this letter to confirm that Cozen O'Connor has been retained by Cotton States Insurance Co. to prepare a lawsuit to seek recovery for the above referenced loss. We have worked together in the past and, as you know, I always like to give Ford an opportunity to settle its claims before suit is initiated in the hopes that each side will be saved unnecessary litigation expenses and be more willing use that money to help settle the case.

Here, liability seems fairly clear and I will ask you to review the file materials one more time and put yourself in the shoes of the Florida jury who may ultimately hear this case. The owner of a 1999 Ford Expedition with only 22,000 miles is traveling down the highway when he smells something burning under the hood. He opens the hood and discovers fire in the engine compartment. That fire substantially destroys the vehicle.

An expert inspecting the vehicle after the fire confirms that the fuel return line had dislodged and was the cause of the fire. Ford apparently has issued a recall for similar fuel leakage problems for vehicles manufactured only five months prior to the vehicle that was destroyed in this fire. Prior to the fire, the owner reports the vehicle had been problem free with no repairs.

ER05-885-LC-0093



October 16, 2001

Page 2

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This is exactly the type of claim that should be settled prior to litigation. My file indicates you have been provided with the necessary file materials to review the claim and your letter from June 26, 2001 indicates you would only need until July 27, 2001 to complete your review. Your engineering department has been given the opportunity to inspect the vehicle and, with this letter, we are hereby releasing that salvage to Ford for inspection.

If you are interested in retaining the remains of the vehicle, please make arrangements to pick up the Expedition within the next thirty days from the Sadisco Salvage yard in Definiak Springs, Florida. You will be responsible for any storage costs associated with keeping the vehicle after November 16, 2001 and, Sadisco may sell the vehicle to cover those costs if you do not make prior arrangements with them. We request to be included in any subsequent destructive testing of the vehicle.

In the meantime, I have been authorized to offer Ford a 15% discount if you wish to settle this case prior to litigation. We do not believe the facts warrant any further discount on this file. Cotton States will accept \$24,045.23 as full and final settlement for its claim of \$28,288.50. Please let me know on or before November 12, 2002 whether you wish to settle this claim without suit.

We, like Ford, believe all cases should be evaluated early for the possibility of settlement. I believe each party now has enough information to settle the case fairly and this offer of settlement is our good faith attempt to come to compromise. I hope the discount offered will be an incentive to Ford to come to the table and help resolve this matter satisfactorily to everyone.

Please review the file one more time and let me know how you wish to proceed. I may be reached by phone at (404) 572-2052 or by e-mail at [dcornelius@cozen.com](mailto:dcornelius@cozen.com).

Sincerely,

COZEN AND O'CONNOR

BY: DAVID A. CORNELIUS

DAC/hs

ERM5-005-LC-0094

# FTI/SEA Consulting



## PROJECT ASSIGNMENT

On July 6, 2000, S.E.A. Inc. was requested by Ms. Beverly Skelton of Cotton States Insurance Company, Atlanta, Georgia, to investigate the June 28, 2000 fire which damaged a 1999 Ford Expedition. This investigation was conducted by Mr. Bill Buckley, C.F.I., Director of Fire Investigations, as S.E.A. Project No. 420427.

## SCOPE OF PROJECT

Specifically, S.E.A. was requested to render a professional opinion regarding the origin and cause of the fire.

## CONCLUSIONS

- The fire was accidental and originated in the engine compartment of the vehicle, adjacent to the bulkhead on the driver's side.
- A separation of the fuel return line was identified as the fuel source for the fire.

# FTI/SEAConsulting



1. The vehicle was examined on July 11, 2000, at Carly Howard Salvage, 3916 Old U.S. Road, Marianna, Florida. At that time the following was accomplished:
  - The damage to the vehicle was photographed, documenting the burn patterns and damage which occurred during the fire. Some of those photographs are included in this report; the remainder are on file at the S.E.A. office in Tampa, Florida.
  - Field notes were prepared.
  - The vehicle was examined to determine the area of fire origin.
  - Potential fire causes were analyzed and evaluated.
  - A 1" piece of the fuel return line was recovered and is being maintained at the S.E.A. facility in Tampa, Florida
  - The insured was interviewed.
2. Subsequent to the site visit, S.E.A. visited the Tallahassee Ford dealership for the purpose of establishing when the vehicle was placed in service and the date of manufacture.
3. Research regarding potential recalls and service bulletins on this vehicle was conducted with the National Highway Traffic Safety Administration (NHTSA).



## EXTERIOR EXAMINATION

Exterior examination of the vehicle revealed extensive fire damage, as shown in Figures 1 through 4. The most severe damage occurred in the front portion of the vehicle. The two front tires suffered fire damage and were deflated. Most combustible components on the vehicle appeared to have been consumed during the fire. All of the glass in the vehicle was missing and the aluminum hood was melted. The vehicle identification number plate was destroyed in the fire. The license plate was found within debris in the rear of the vehicle (Figure 5). The license number was found to be XBB 57X.

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The remains of the aluminum hood were found in the engine compartment, as shown in Figure 6. These remains are shown in Figure 7 after reconstruction. A distinct burn pattern was noted at the bulkhead indicated by the arrow.



**FIGURE 1:** Front of vehicle.

PHOTOS



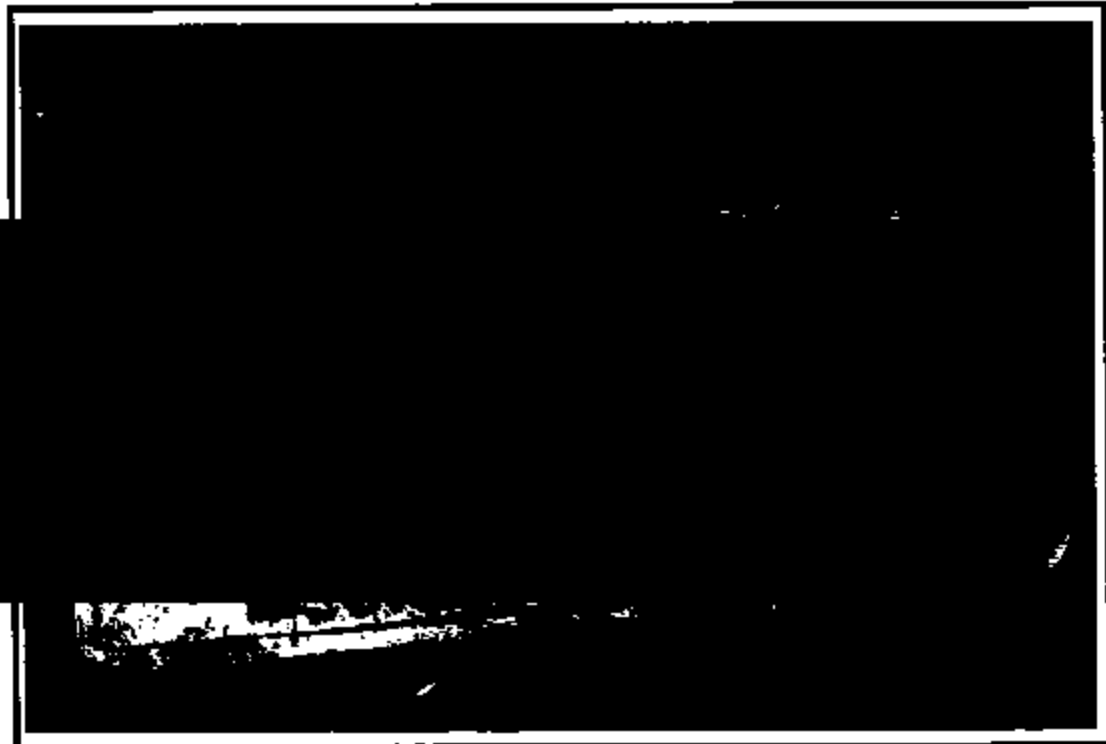
**FIGURE 2:** Driver's side of vehicle.



**FIGURE 3:** Passenger side of vehicle.



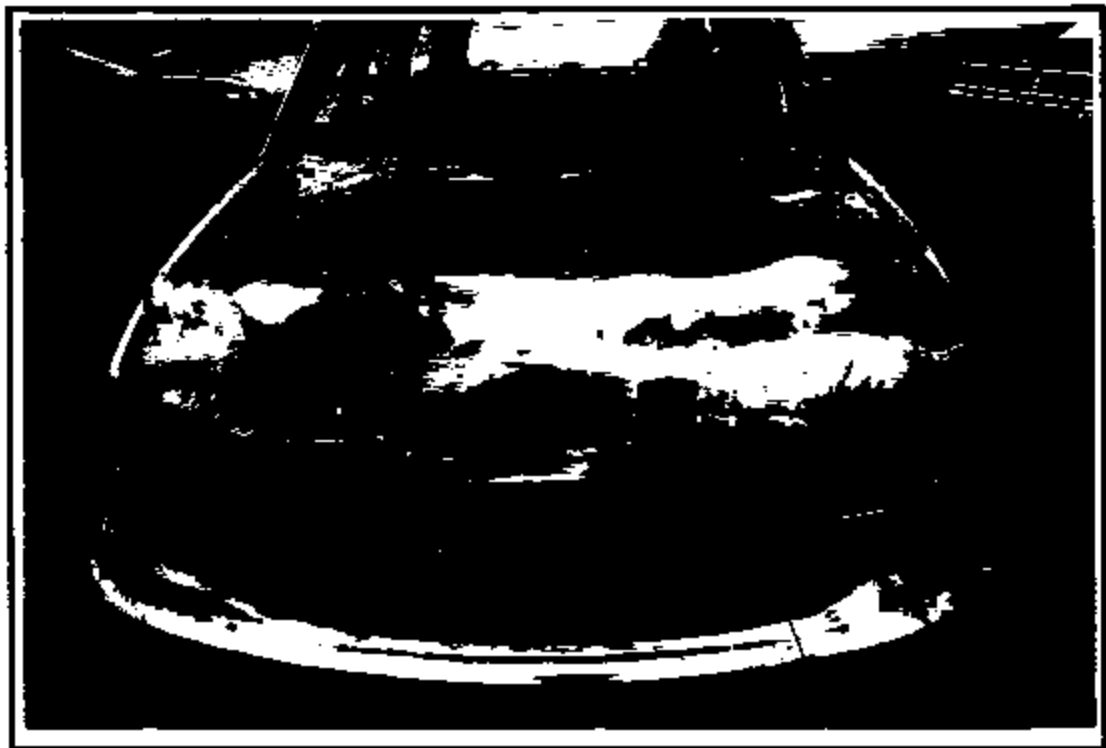
**FIGURE 4:** Rear of vehicle.



**FIGURE 5:** License plate.



**FIGURE 6:** Remains of hood.



**FIGURE 7:** Reconstructed hood and burn pattern on bulkhead.



## INTERIOR EXAMINATION

Examination of the passenger compartment revealed that all combustible components were consumed, as shown in Figures 8 and 9. Examination of the damage indicated that the fire progressed to the passenger compartment from the engine compartment. The wiring harness in the dash of the vehicle had insulation remaining, as well as portions of printed circuit boards (Figure 10). The passenger compartment was eliminated as the fire origin area.



FIGURE 8: Passenger compartment damage.



**FIGURE 9:** Passenger compartment damage.



**FIGURE 10:** Wiring harness in dash.

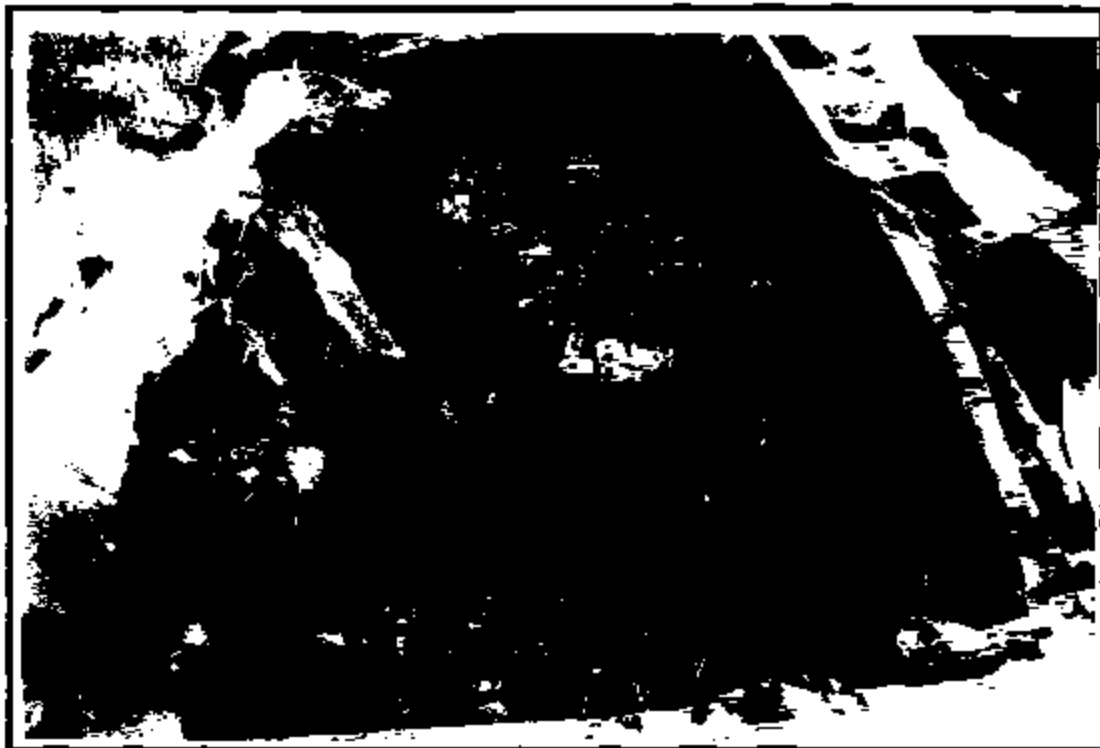
# FTI/SEA Consulting

## ENGINE COMPARTMENT EXAMINATION

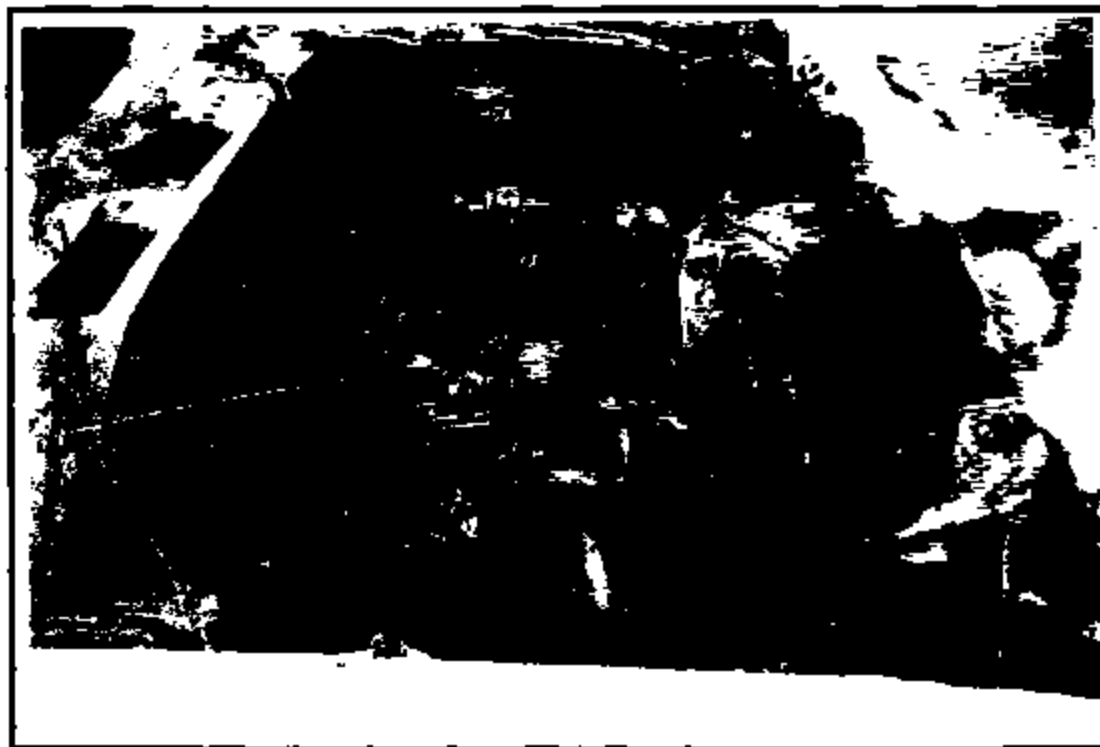
Figures 11 and 12 show the damage within the engine compartment from the driver's and passenger sides, respectively. Most of the combustible components of the engine compartment were destroyed. The radiator and air conditioning condenser were also almost completely consumed. The arrow in Figure 12 indicates where the aluminum alloy intake manifold was destroyed toward the rear portion of the engine. It should also be noted that the fiberglass valve cover on the driver's side (Figure 11) has suffered significantly greater damage than the one on the passenger side.

Examination of the area to the rear of the engine revealed a significant burn pattern, as indicated by the arrow in Figure 13. This burn pattern indicates the fire was progressing from the area adjacent to the bulkhead. Located in this area was a wiring harness and the vehicle fuel lines. These components are shown in Figure 14. S.E.A. did not find any evidence to indicate that an electrical failure had occurred within the wiring harness. Examination of the fuel lines shown in Figure 15 revealed that a portion of the return fuel line had been dislodged, as indicated by the arrow in Figure 15. This fuel line is located adjacent to the burn pattern identified on the bulkhead. The arrow in Figure 16 highlights additional damage to the bulkhead at the location of the fuel lines.

Examination revealed fire damage to approximately one-half of the fuel line, as indicated by the arrow in Figure 17. This damage occurred where the fuel line appeared to have separated and would indicate a fuel leak at this location. Further examination of the small 1" piece of fuel line which had become dislodged revealed similar burn damage (Figure 18).



**FIGURE 11:** Engine compartment (driver's side).



**FIGURE 12:** Engine compartment (passenger side).



**FIGURE 13:** Damage on bulkhead within engine compartment.



**FIGURE 14:** Fuel lines.



**FIGURE 15:** Fuel lines.



**FIGURE 16:** Burn pattern on bulkhead.



FIGURE 17: Damage to fuel line.



FIGURE 18: Damage to fuel line.

# FTI/SEAConsulting

## INSURED INFORMATION

In an interview with [REDACTED], he stated that the vehicle was purchased in January of 1999 and the odometer indicated approximately 22,000 miles at the time of the incident. [REDACTED] indicated that the vehicle had been trouble free and no repairs had been made, other than routine maintenance such as oil changes.

At the time of the incident, [REDACTED] was driving along the highway. He smelled something burning but could not identify it in the vehicle so he pulled over to the side of the road but still could not detect where the odor was coming from. He then raised the hood and observed flames at the rear of the engine. [REDACTED] stated he tried to put dirt on the fire but it had no effect. He then ran to a nearby residence for assistance. By the time help arrived, however, the vehicle was fully engulfed in flames.

## DEALERSHIP INFORMATION

Records at Tallahassee Ford showed that the vehicle was sold to [REDACTED] in January of 1999. The records revealed that the vehicle was built on December 6, 1998. The only service bulletin identified at the dealership for this particular vehicle was a recall on a windshield wiper switch. The vehicle identification number was found to be 1FMPU18L5X1 [REDACTED]

## RECALL INFORMATION

A search of the National Highway Traffic Safety Administration recall database revealed several recalls for this vehicle. One recall involved the trailer hitch and attachments. A second recall (which did not include a specific date of manufacture) was a fuel line leakage problem. This recall identified vehicles manufactured in August 1998 and affected only 305 vehicles. This vehicle does not fit into the parameters identified in that recall (campaign number 98S35). One additional recall involved lug nuts and bolts. A copy of the recall data is included in the Addendum to this report.



# FTI/SEAConsulting

## IV. SIGNATURES

S.E.A., Inc. hereby certifies the expressed opinions and conclusions have been formulated within a reasonable degree of professional certainty. They are based upon all of the information known by S.E.A. as of the time this report was issued, as well as knowledge, skill, experience, training, and/or education.

Report Prepared By:

Report Reviewed By:

  
Bill Buckley, C.F.I.  
Director of Fire Investigations

  
John A. Bakshis  
Senior Engineer

BB:ma

S.E.A. PROJECT NO. 420427

ISSUE DATE: AUGUST 14, 2000

WILKSON COUNTY FIRE RESCUE

FIRE INVESTIGATION

NO 002758

4/22/00 *Handwritten* 50

RUN # 10 STATION # 010 SHIFT 06 DATE 06 DAY: 28 YEAR: 00 TIME OF ALARM: 2044

Time Enroute: 2047 Time Arrived at Scene: 2054 Time Returned to Station: 2211

Location of Fire: ESSEX ROAD & Hwy 162

Business: [ ] Dwelling: [ ] Auto: [x] Accident: [ ] Type of Structure: 1999 Ford Explorer

Area of Origin: Under Hood Cause of Fire (if known): UNKNOWN

Name of Owner: [Redacted] Address: [Redacted] PX# 6749119

Name of Tenant: Same Address: [Redacted]

Name of Insurer: [Redacted] Local Agent: Cottrell's

Address: [Redacted] Telephone: [Redacted]

Amount of Structure Damage: 27000 Contents: 500

Vehicle Make: Ford Model: Explorer Year: 99 Tag #: [Redacted] VIN#: 1FMPU19L5XU

Vehicle Make: [Redacted] Model: [Redacted] Year: [Redacted] Tag #: [Redacted] VIN#: [Redacted]

If Injuries or Death List Name: [Redacted] Address: [Redacted]

Extent of Injuries: [Redacted]

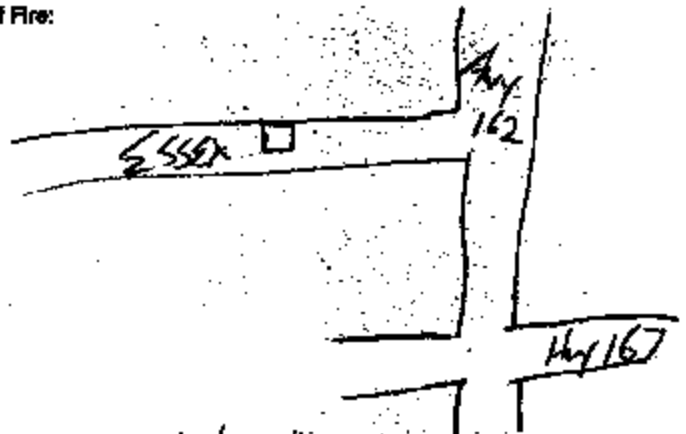
Firefighter in Charge of Fire: Brett

Firefighters at Fire: Robinson Price

Firefighters at Station: Nashid Pierce

Equipment Used: 32 35 371 600 Gals H2O & Foam

Diagram Layout of Fire:



Summary of Fire: Owner states he smell burning + stopped to open hood and saw fire underneath vehicle. was a total loss

Reported By: Smith Approved By: Carol Patterson

# INCIDENT REPORT

## Jackson County Fire Rescue

NFRS-1

[ ] DELETE  
[ ] CHANGE

A	FDID 25643	INCIDENT NO 00-000428	EXP NO 00	MO 06	DAY 28	YR 06	DAY OF WEEK Wednesday	ALARM TIME 20:44:00	ARRIVAL TIME 20:54:00	IN SERVICE 22:11:00	
B	TYPE OF SITUATION FOUND Vehicle Fire						TYPE OF ACTION TAKEN Extinguishment			MUTUAL AID 1 [ ] Recd [ ] Given	
C	FDIED PROPERTY USE Not Applicable						IGNITION FACTOR 006 Undetermined			00	
D	CORRECT ADDRESS Essex Road @ Hwy 162 Greenwood, FL							CO. JA	TWN	ZIP CODE	CENSUS TRACT
E	OCCUPANT NAME							TELEPHONE		ROOM/APT NO	
F	OWNER NAME			ADDRESS				TELEPHONE			
G	METHOD OF ALARM FROM PUBLIC Radio				TYPE OF ALARM 4 Regular		DISTRICT 2	SHIFT 399 C	STATION 1	NO. ALARMS 1	
H	911 USED E911		PERSONNEL RESPONDED 2	ENGINES RESPONDED 004		AERIAL APPARATUS 000		OTHER VEHICLES 002			

ALL INCIDENTS

I	NUMBER OF INJURIES FIRE SERVICE 000			OTHER 000			NUMBER OF FATALITIES FIRE SERVICE 000			OTHER 000		
---	--	--	--	-----------	--	--	--	--	--	-----------	--	--

CAS

J	COMPLEX No Complex				MOBILE PROPERTY TYPE 98 Automobiles				11			
K	AREA OF FIRE ORIGIN Engine Area, Running Gear				EQUIPMENT INVOLVED IN IGNITION 83 No Equipment Involved				88			
L	FORM OF HEAT OF IGNITION Undetermined			TYPE OF MATERIAL IGNITED Undetermined			FORM OF MATERIAL IGNITED Undetermined			00		
M	METHOD OF EXTINGUISHMENT Preconnect w/Tank Water			LEVEL OF FIRE ORIGIN Grade to +6'			ESTIMATED LOSS 1		ESTIMATED VALUE			

ALL FIRES

N	NUMBER OF STORES					CONSTRUCTION TYPE				
O	EXTENT OF FLAME DAMAGE					EXTENT OF SMOKE DAMAGE				
P	DETECTOR PERFORMANCE					SPRINKLER PERFORMANCE				
Q	IF SMOKE SPREAD BEYOND ROOM OF ORIGIN		TYPE OF MATERIAL GENERATING MOST SMOKE			AVENUE OF SMOKE TRAVEL				
R			FORM OF MATERIAL GENERATING MOST SMOKE							

STRUCTURE

S	IF MOBILE PROPERTY	YEAR 99	MAKE Ford	MODEL Expedition	SERIAL NO. 1FMPU10LXL7	LICENSE NO. XEB57X
T	IF EQUIPMENT INVOLVED IN IGNITION	YEAR	MAKE	MODEL	SERIAL NO.	

[X] CHECK IF COMMENTS

U	OFFICER IN CHARGE (NAME, POSITION, ASSIGNMENT)			DATE		
	ROBINSON, DENNIS R/CAPTAIN			06/28/2000		
	MEMBER MAKING REPORT (IF DIFFERENT FROM ABOVE)			DATE		
	BRETHER,			06/28/2000		

**INCIDENT REPORT**  
**Jackson County Fire Rescue**

A

FOID	INCIDENT NO	EXP NO	MO	DAY	YR	DAY OF WEEK	ALARM TIME
25642	00-000428	08	08	28	08	Wednesday 4	20:44:00

**NARRATIVE**

Owner states he smelled something burning and stopped to look under hood and saw fire. Vehicle became fully involved. Vehicle was a total loss.

**RESPONDING PERSONNEL**  
**Jackson County Fire Rescue**

FOID	INCIDENT NO	EXP NO	MO	DAY	YR	DAY OF WEEK	ALARM TIME
25042	00-000422	06	06	28	00	Wednesday 4	20:44:00

STAFF ID	NAME	ACTIVITY CODE	PAY SCL	HRS	HRS PD	POINTS
000306	ROBINSON, DENNIS R	FX Fire At Scene		1.45	1.45	0.00
000322	BRETH, SAM,W.	FX Fire At Scene		1.45	1.45	0.00
000337	PAGE, DANIEL E	FX Fire At Scene		1.45	1.45	0.00
000339	NASHID, LAVERNUS	FX Fire At Scene		1.45	1.45	0.00

TOTAL PARTICIPANTS: 4

TOTAL PERSONNEL HRS: 5.80

EDGE-005-LC-5114

**RESPONDING UNITS**  
**Jackson County Fire Rescue**

FDID	INCIDENT NO	EXP NO	MO	DAY	YR	DAY OF WEEK	ALARM TIME
28942	00-000428	00	06	28	00	Wednesday 4	20:44:00

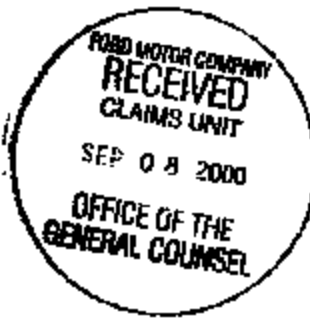
UNIT CODE		RESPONSE CODE	ALARM	ARRIVAL	RESPONSE
353	ALS TYPE ONE EMS	1 Emergency	20:44:00	20:54:00	00:10:00
362	1000 GPM RESCUE PUMPER	1 Emergency	20:44:00	20:54:00	00:10:00
371	2000 GAL TANKER	1 Emergency	20:44:00	20:54:00	00:10:00

TOTAL UNITS: 3



244 Perimeter Center Parkway N.E. Atlanta, Georgia 30346  
 Mailing Address: P.O. Box 163303 Atlanta, Georgia 30348  
 Phone: 770-591-8600  
 www.cottonstatesinsurance.com

AUGUST 31, 2000



FORD MOTOR COMPANY  
 OFFICE OF THE GENERAL COUNCIL  
 3 PARK LANE BLVD  
 PARK LANE TOWER CREST, SUITE 400  
 DEARBORN, MI 48126

REF: TOTAL FIRE LOSS 1999 FORD EXPEDITION  
 SERIAL NUMBER: 1FMPU18L5X1 [REDACTED]  
 INSURED/OWNER: [REDACTED]  
 LOSS DATE: 6/28/2000  
 CLAIM NUMBER: [REDACTED]

TO WHOM IT MAY CONCERN:

We are the automobile carriers for the 1999 Ford Expedition that was burned to a total loss on the date noted above. We have settled the total loss claim with our insured, [REDACTED]

The cause of the fire has been investigated and the findings indicate that the fire originated in the compartment of the vehicle adjacent to the bulkhead on the driver's side. A separation of the fuel return line was identified as the fuel source for the fire.

We have settled the claim for \$28,039.50 less the insured's \$250.00 deductible. We are seeking reimbursement for our payment of this claim. The vehicle was badly damaged but the remains are at Safinco in DeFtistik, Springs, Florida. You can contact Safinco at 1-850-892-5012 for inspection of the vehicle.

If you have any questions, please call this office at 1-80-282-6536 ext. 8977

Sincerely,


*Elin Bowman*

Elin Bowman  
 Senior Analyst - SUBROGATION

EBV

\$ 28,039.50

IN THE ASSOCIATE CIRCUIT COURT OF THE COUNTY OF ST. LOUIS  
STATE OF MISSOURI

	)	
Plaintiff,	)	Cause No.:
	)	
vs.	)	Division No.: 41M
	)	
FORD MOTOR COMPANY,	)	
	)	
Serve: Registered Agent	)	
The Corporation Company	)	Over \$5,000.00
120 S. Central Avenue	)	
Clayton, MO 63105	)	
	)	
Defendant.	)	

**PETITION**

Comes now Plaintiff and for his cause of action states:

1. Plaintiff was the original lessee of a 1996 Ford F-150 pickup and had a possessory interest in said pickup which at all times pertinent was under warranty from defects by Defendant.
2. This cause of action was previously filed and dismissed without prejudice on January 13, 1999.
3. Defendant breached its warranty to Plaintiff because the vehicle was not fit for the purpose for which it was intended, in that it was manufactured in such a fashion that a connector on a pressurized fuel line separated from the fuel line, allowing gasoline vapors to escape and ignite.
4. As a direct and proximate result of the breach of warranty of Ford Motor Company, Plaintiff was caused to sustain fire damage and depreciation to his motor vehicle in an amount of almost \$16,000.00. Plaintiff also sustained a loss of use as a result of Defendant's

ERBS-885-LC-8117



conduct in an amount no more than \$1,000.00.

WHEREFORE, Plaintiff prays his damages against Defendant in a fair and reasonable amount of more than \$5,000.00, but not to exceed \$25,000.00, for his costs, and for such other further relief that the court deems just and proper.

WILKE & WILKE, P.C.

By: 

Daniel E. Wilke #24464  
Richard A. Tjepkema #45582  
Attorneys for Plaintiff  
130 S. Barnston, #308  
P.O. Box 11787  
Clayton, MO 63105  
314-725-3301  
314-726-6622 FAX

**PEACE VALLEY-WHITE CHURCH  
FIRE DEPARTMENT**

P. O. Box 72

Peace Valley, Mo. 65788

Bus. Phone (417) 277-5562

Emergency (417) 277-5585

**NON-MEMBER SERVICES BILLING**

Date of fire 03-23-97 Time of fire call 15:30 Time call ended (in service) 16:40

Location of fire 6092 ST Rt 17 WEST PLAINS, MO.

Property owner

Name

Address

Phone

Resident (if different than above)

Name

Address

Phone

Insurance Co. STATE FARM

Type of fire VEHICLE FIRE - #1 PUMPER TRUCK

TWO FIREMEN TWO VOLUNTEERS

Charges

\$50.00 per call ----- \$ 50.00

\$250.00 per hour ----- \$ 250.00 1 hr.

Other Charges (list) FUEL DEVELOPING 14.62

Other charges ----- \$ 14.62

Total Charges ----- \$ 314.62

Description of damages, follow-up 1996 FORD F-150 V6N-1FTRF15Y3T

Signature of Fire Official [Signature]

Rank CHIEF

Date 3-26-97

PO 4-7-97

**APR - 7 1997**

PLEASE FORWARD THE FOLLOWING  
STATEMENT INTERVIEWING:

JESSE BROTHERTON

TO THE ATTENTION OF:

VALERIE KISSEE

Claim No.:  
Insured:



Thank you!

The Regional Office Word Processing Center

This is Valeria Kissea interviewing [REDACTED] Today's date is Tuesday, March 25, 1997. The time is approximately 4:15 P.M. This is concerning a vehicle file which occurred on March 23, 1997 at approximately 3:00 P.M. on Highway 17 north of West Plains, Missouri.

Q. [REDACTED] can you state your full name and spell your last name

A. [REDACTED]

Q. And I have to ask you, is this recording being made with your full knowledge and consent?

A. It is now.

Q. Can you tell me your date of birth?

A. [REDACTED]

Q. Are you married?

A. Yes

Q. Wife's name?

A. [REDACTED]

Q. And the number of dependants you have at home?

A. Two, kid and my wife.

Q. You've got one child?

A. Yes

Q. And what's that child's name?

A. [REDACTED]

Q. How old is Nike?

A. [REDACTED]

Q. Your home address?

A. [REDACTED]

Q. [REDACTED]

A. Yeah, I'm about half lost every time somebody asks me.

Q. Okay and that's in Panama, Missouri, your zip code?

A. [REDACTED]

Q. And your home phone number?

A. [REDACTED]

Q. And where can you usually be reached during the day?

A. During the day, at this number, [REDACTED]

Q. And what number is that, where does it go to?

A. That's [REDACTED] Machine Works.

Q. And the address of that?

A. [REDACTED] in West Plains.

- Q. And are you the owner of that business?  
A. I'm a partner in this business.
- Q. With family, I assume?  
A. Yes.
- Q. How long have you lived at the residence where you're at now?  
A. Five and a half years.
- Q. Do you own that location?  
A. yes.
- Q. Can you tell me what your driver's license number or social security number is?  
A. [REDACTED]
- Q. How long have you been employed at the business that you're in now?  
A. Two years.
- Q. What did you do before that?  
A. I was on social security disability
- Q. What exactly do you do now?  
A. I'm a machinist
- Q. Okay. Can you tell me about, give me the date, and the time and the location of the fire, if you can.  
A. The date, let's see, Sunday would have been March 23, sometime Sunday afternoon, I don't know what time it was. Be about 3:00 or 4:00 in the afternoon.
- Q. Where did the fire take place?  
A. At my nephew's house.
- Q. Were you there when this happened?  
A. Yes I was.
- Q. Okay, did you see the fire?  
A. Yes I saw the fire. A neighbor come out and saw the smoke and hollered at me. I was in my nephew's garage.
- Q. What is your nephew's name?  
A. [REDACTED]
- Q. You don't happen to know his address there, do you by chance?  
A. No I don't. It's where, that's where the pickup's at.
- Q. Okay. Can you describe the fire, what did you see when you looked out?  
A. Smoke under the hood, that's all we saw at the time.
- Q. Any particular area that you noticed that appeared to be flaming more than the other?

- A. There wasn't, we couldn't see any flames, all we could see was smoke. We hooked up a garden hose and by the time we started getting water to the thing, the paint was peeling right almost dead center in the middle of the hood. And at that point, we popped the hood latch and tried to get water under the hood and did extinguish flames repeatedly on the left side but we couldn't get the safety latch unlatched, it was hot and to be honest, I was kind of excited and couldn't find the latch, and it wa shot and I couldn't get it open. But it just continued to get hotter and hotter and eventually it burnt through into the cab.
- Q. Did you eventually get the fire put out, or what happened?
- A. Eventually. I kept putting water on it and the fire department came and put the fire out. But for the whole time that the fire was burning, once we noticed it and this couldn't have been a span of three to five minutes that I'd been inside. And from that point on, just as quick as we could hook up a garden hose, it was laying at the hydrant, we had water on it the whole time until the fire department got there.
- Q. Which fire department was that?
- A. Peace Valley White Church.
- Q. Okay, any idea how long it took them to get there?
- A. Not very long. The fireman was a neighbor that saw the smoke and immediately, once we got the hose hooked up, he drove a mile up the road and got the fire truck, so I don't know how long it was, but it was a pretty short period of time.
- Q. Okay. Did they make a report, that you're aware of?
- A. Yes.
- Q. Do you have the report number by chance?
- A. No I don't.
- Q. Did they render an opinion as to what started the fire?
- A. They had no opinion. They talked and discussed where they thought the fire might have originated, but they couldn't draw any conclusion on what they thought had done it. There was a lot of discussion of the fact that this seemed to be manufacturer's problem and due to this case they asked if I would like them to file a report with the fire Marshall and I said well if it would help the case any, yes. And the best I know they are doing that.
- Q. Okay. Do you have any opinion as to what started the fire at all?
- A. I've got absolutely no idea and I am somewhat of a mechanic. And I, you know, by the time anything was visible from where the fire was, there was absolutely no idea. Pickup run just fine, everything was fine with it. There's been nothing suspicious wrong with it. It just, one minute it was fine, the next minute it was on fire.

- Q. Okay. Was it locked when it caught on fire?
- A. No. In fact, I'm not sure this was something that we discussed over there and finally later on sat at home and discussed with my wife, I think the engine was running. When I drove up there, I was going to my nephew's to hunt parts for my stock car, and when I drove in the driveway I saw his car was gone and I thought, well he's not here. And I know for a fact that I got out and left it running and went to the door, just to make sure. Well after I established for sure he's not here, I went back and started to leave and then I decided, well I thought that I could find what I wanted and then I got back out and at first I thought that I shut it off then, but I don't think I did. I think it was still sitting there running. And I went in the garage and looked for what I wanted and, like I said, it couldn't have been but like three to five minutes and the guy's name is [REDACTED] he was heading to the field with a tractor and a fertilizer buggy and saw the smoke and he hollered at me and I come out and I know at this time it was not running.
- Q. So if you left it running, it stopped.
- A. It stopped but now, I don't know, the switch was off when the fire was put out. But I think [REDACTED] was hooking the water hose and I was preparing to pull the hood latch as soon as we had water running and I was hearing the key buzzer and it made me think the switch was on. Of course, you know, afterward, I realized this made no difference as long as the door was open and the key buzzer was on. And I reached in and I don't know if I shut it off or if it already was off and at the time I thought, well, I'd shut it off when I went in the garage. But I really believe that I left it sitting there running, to be honest. I can't say for sure that I did, but I believe I did.
- Q. Okay, you say the man who had the truck or tractor with fertilizer, what was his name?
- A. [REDACTED]
- Q. Do you know how he spells his last name?
- A. [REDACTED] And he is a member of the White Church Peace Valley Fire Department. This kind of speeded things up.
- Q. Okay. And the police or no one else came, just the fire department came out and put it out for you?
- A. No, the fire chief out there called the sheriff's department and brought this all up to them and they said there wasn't really anything that they was interested in. And I don't know who else he called. He called a parson or two.
- Q. Okay. If you could, what do you think the condition of the vehicle was, in your opinion, how would you rate it?
- A. Before or after the fire?
- Q. Before.

- A. Oh, it was perfect. You know, I mean, it was just like it was the day I drove it home.
- Q. Okay. If you would, give me the exact make, model, color and everything you know about it, just as much as you've got on it.
- A. It's a '96 Ford F-150, white. What else do you want to know?
- Q. Do you know the horse power on it?
- A. No, but I know it was a 300 engine.
- Q. Okay. Do you know what your tag number that's on it was, by chance, the license plate number?
- A. No I don't.
- Q. Okay, who owns the vehicle with you, just you, your wife?
- A. Ford Motor Company. Yeah, Ford Motor Company is the owner and I'm a lessor.
- Q. So it's a leased vehicle?
- A. Yes.
- Q. Where did you typically keep the vehicle at, at your house?
- A. At home, yes.
- Q. Okay. What was the approximate mileage on that vehicle?
- A. Somewhere around 7,000. I don't know exactly, but it was real close in that neighborhood.
- Q. Had you just recently leased the vehicle?
- A. In August.
- Q. In August of '96?
- A. Yes.
- Q. And who did you lease that from?
- A. Ford Motor Company, Friendly Ford.
- Q. Friendly Ford in Springfield?
- A. Yes.
- Q. Okay. And do you know how long your lease was?
- A. Three years.
- Q. Okay. When the vehicle caught fire, do you know or have any idea how much gas was in the gas tank?
- A. I don't know, I would say less than half a tank in one tank. It did have two tanks and I'm going to say that the other one was empty. I'm not sure. The other one could have been full. I usually, you know, run one and fill the other one, but I think that the other tank was empty and probably less than half a tank in the one it was running off.
- Q. Did you have an inspection sticker on the vehicle?
- A. No.



- Q. None at all?  
A. None at all.
- Q. Had the vehicle ever been inspected?  
A. As far as I know it hasn't. I don't know how or why, but Ford Motor Company didn't send me any license plates right away and after I called and got kind of ugly with them, the license plates showed up. It never did have an inspection sticker.
- Q. Okay. Had the vehicle ever been damaged, to your knowledge at all. Any type of collision?  
A. No. None at all.
- Q. Was the vehicle brand new when you leased it?  
A. It had 280 miles on it. It was a new vehicle. I think they had transported it from one dealer to the other, is the only thing that had been done.
- Q. Okay. Have you had any type of work done it recently at all. Any mechanical?  
A. The only work it's had done on it was just before 5,000 it had an oil change and lube.
- Q. Who did that work?  
A. I did that.
- Q. You did it yourself?  
A. Yes.
- Q. Okay. I'm going to run through the vehicle equipment, if you would, just tell me whether it had this or not, if you would.  
A. Okay.
- Q. As far as the radio, was it AM-FM stereo?  
A. AM-FM stereo but no tape player or anything.
- Q. No tape player, just the radio?  
A. Right.
- Q. No CD player?  
A. no.
- Q. Did it have air conditioning?  
A. Yes.
- Q. And power steering?  
A. Yes.
- Q. Power brakes?  
A. yes.
- Q. Did it have power windows?  
A. No.

- Q. Tilt steering?  
A. No.
- Q. What about the wheels, what type of wheels did it have on it?  
A. Ah, they were some kind of fancy looking steel wheel. I don't know what you'd call them. They weren't anything....
- Q. Was it aluminum?  
A. No they were steel.
- Q. Okay.  
A. I don't know what you'd call them by today's standards, they probably won't fancy, but they weren't plain wheels either.
- Q. Did it have power seats in it?  
A. No.
- Q. What about cruise control?  
A. No.
- Q. And the vehicle transmission, automatic, standard?  
A. Five speed
- Q. Okay and did it have a middle console, any type of console in it?  
A. No.
- Q. Bench seat?  
A. Bench seat, yes..
- Q. Okay. And as far as the tires, were they radial's?  
A. Yes.
- Q. Have any idea, were they new tires when they were put on the vehicle?  
A. As far as I know. I mean it was a new pickup with new tires on it.
- Q. Okay. If I could [REDACTED], I'm going to stop my tape and change it to side two so I can conclude this, okay?  
A. Alright.
- Q. Okay, this is Valerie Kissee this continues the interview on side two of the tape. [REDACTED] is it true we haven't had any conversation since I switched the tape to side two?  
A. That's true.
- Q. Did you have any type of CB radio in the vehicle?  
A. No.
- Q. Okay, and as far as conditions, I'm going to with fair, good, or excellent. I'm going to run through these categories and I ask that you give me your personal opinion as to how you would rate it, okay. Paint?  
A. excellent

Q. mechanical?  
A. excellent

Q. interior?  
A. excellent

Q. body?  
A. excellent

Q. Engine?  
A. Excellent

Q. Transmission?  
A. Excellent.

Q. Okay, was there any type of prior damage to the vehicle at all, dents,?  
A. None.

Q. Okay. Do you have any idea what your lease pay off is?  
A. A couple of months ago I did. I don't know now. No.

Q. Okay. Had you been trying to sell the vehicle?  
A. At one point we discussed it, but we didn't pursue that.

Q. Okay. And when you bought that, did you trade a car in on it or did you just lease it outright?  
A. Just leased it outright.

Q. Okay. Do you have your account number by chance at Ford Motor Credit with you today?  
A. I don't know. Yeah I do. I think. Here it is.

Q. Okay.  
A. [REDACTED]

Q. And what is your monthly payment on that lease?  
A. \$346.22

Q. When was your last payment made on it?  
A. It would have been in February.

Q. Any idea what date that would have been?  
A. No I don't really. I'm kind of inconsistent, a few days here, a few days there.

Q. Is the account current or is it past due?  
A. It would be current up until this last week.

Q. Okay. You haven't sent your March payment in yet?  
A. no I haven't.

Q. Do you have any other type of insurance that covers this vehicle whatsoever?  
A. Just State Farm policy.

- Q. Okay. Have you ever had any other claims with State Farm within the last six months, whether they be car or with your home?
- A. No. No.
- Q. Okay. The vehicle has never been stolen before has it?
- A. No.
- Q. Okay, I can't think of anything else that I need to ask you [REDACTED] is there anything in particular about the fire or that sticks in your mind that I haven't asked you that you'd like to add to the recording at this time?
- A. I don't know what or why, but a new pickup with 7,000 miles, something's wrong. That's about all I know.
- Q. Okay, and I have to ask you, have the remarks that you've made in the recording, are true to the best of your knowledge?
- A. Yes they are.
- Q. And has this recording been made with your full knowledge and consent?
- A. Yes.
- Q. Okay, this will conclude the interview. Today's date is Tuesday, March 25, 1997. The time is approximately 4:32 P.M.

020/0619016

1996 Ford F-150

██████████ Insured

#### NOTIFICATION

On March 27, 1997, I was contacted by telephone by Valerie Kisse, Claim Specialist, State Farm Insurance Companies, and asked to conduct a fire cause investigation near West Plains, Missouri. She reported a 1996 Ford F-150 pickup was damaged as a result of a fire which occurred while the engine was running. She said the vehicle had been located at the insured's nephew's home when the fire happened. She said a neighbor observed smoke and used a garden hose in an attempt to control flames. She said the neighbor, who is a member of the area fire department, then went to the fire station and returned with a fire engine in order to extinguish the fire.

Ms. Kisse said White Church Fire Chief Steve Cleghorn prepared a report on this fire loss. She also provide the insured's name and contact information, the claim number, the directions to the fire scene, the VIN, and an evaluation of the areas which were most extensively damaged (right front of vehicle, dash, passenger compartment, and right front tire).

She asked that I investigate the fire and determine the cause.

#### LOSS INFORMATION

Insured: ██████████ Pomona MO ██████████ telephone  
number ██████████ (work) and ██████████ (home).

Claim Number: State Farm Claim No. ██████████

Fire Location: ██████████ West Plains, MO.

Date of Loss: March 23, 1997.

Investigated On: March 31, 1997 and May 23, 1997.

#### SYNOPSIS

This is an ACCIDENTAL fire which resulted from the ignition of gasoline vapors released when a connector — on a pressurized fuel line — separated from the fuel line. The vehicle's engine was in operation when the fire occurred. Gasoline vapors were ignited either by a spark from the ignition circuit or alternator, or the vapors were ignited by contact with the heated engine or a heated exhaust system component.

The community's assistant fire chief discovered this fire and provided important information.

AFI # F97-03318

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State Farm # 25-5016-768

ENES-005-LC-0130

### FIRE INVESTIGATION

I examined this vehicle on two occasions. The first examination took place at the fire scene on March 31, 1997, and the second examination took place at the Southern Missouri Insurance Pool on May 23, 1997.

The fire occurred behind a dwelling located at [REDACTED] West Plains, Missouri. The flames did not spread from the pickup to the dwelling or to the two nearby barns.

The second examination occurred after the pickup had been moved to an insurance storage pool. The facility is the Southern Missouri Insurance Pool located at 1155 N. Eldon Ave., Springfield, Missouri.

Neither the insured nor his nephew were present during the scene examination. The community's assistant fire chief came to the scene during my examination as he is the nephew's landlord and saw my vehicle behind the nephew's home.

#### Vehicle Exterior:

The fire patterns on the exterior of the pickup show the greatest damage was evident on the right half of the top surface of the hood, to the right front fender, to the right side of the grille and front bumper, and to the right half of the windshield.

There was no fire damage visible in the pickup's bed or to the rear undercarriage area.

#### Vehicle Interior:

The fire damage within the cab was greatest on the right side — with fire patterns showing flames spread from right to left inside the cab. The fire spread through the firewall from the heater assembly area in the right side of the firewall.

The fuses in the cab were examined. Five of the fuses were in the "open" position. These fuses were #8, #9, #10, #13, and #16. The usage for these circuits was determined by looking at fuse assignments shown on the chart on the inside of the fuse panel cover. Four of the five fuses served circuits primarily located within the cab. The fifth is for circuits which are both inside and outside the cab. After examining the fuses and inspecting the vehicle, I later concluded that the open fuses were the result of the fire and not associated with its cause.

While I was examining the right side of the cab, I detected an odor like that of gasoline. As I searched the area for the source, I noticed the odor was coming from under the vehicle — not from inside the cab. I did not find any evidence of gasoline vapor originating within the cab, and I used an electronic gas/vapor detector to search for the source of the odors. The instrument confirmed that the source was beneath the vehicle — in an area adjacent to the right side of the firewall but on the engine compartment side of the firewall.

**Engine Compartment — General Observations:**

When I first looked under the hood, I noticed the fender wells — especially the left one — were burned severely. The fender wells had apparently been constructed from a plastic product, and I noted the material melted and dripped down as it burned and left "flow marks" on the front tires. I could look down and see the ground around the tires. It was an unusual observation.

I noted the fire patterns indicated fire damage was much greater in the right rear quadrant of the engine compartment than in the left front quadrant. Fire patterns indicated flames spread from the rear of the engine, toward the right rear corner, up against the hood, across the top of the engine compartment, along the right side of the engine, and into the cab by means of the heater assembly area located in the right half of the firewall. Flames also spread into the cab by burning up into the cowl area and breaking the windshield.

Some rubber hoses and wire insulation on the driver's side of the engine were partially or mostly unburned. The upper radiator hose is burned near the thermostat housing and less near the radiator connection. The belt-driven attachments to the engine are burned less on their right sides than on their left sides.

The radiator is burned more noticeably on its right side than on the driver's side of it. The fire patterns show fire damage to the grille is much greater on the right side than on the driver's side.

The aluminum evaporator assembly for the air conditioner was on the ground under the right side of the engine compartment. It appeared as if it was damaged by intense heat which caused its aluminum lines to melt and then break — which allowed it to fall downward and land on the ground. The fins on one portion of the evaporator are damaged by fire more than others, and the evaporator

was tagged and collected as evidence in the event that it needed to be examined later. The damage to the firewall was greater in the right half than to the left half.

By examining the fire patterns in the engine compartment, I noted the fire burned from the rear of the engine toward the front and from the right side of the engine compartment toward the left.

**Engine Compartment — Specific Observations:**

During my first inspection of the vehicle, I looked at all visible components — including the fuel lines, the fuel rail, the fuel pressure regulator, and the top of the engine. Initially, the fuel lines routed from the lower left rear corner of the engine to the top center rear of the engine looked to be in their pre-fire and proper positions.

I saw no apparent misalignment of the fuel lines, but I decided to look closer because the concentrated intense fire damage in the right side of the engine compartment looked to be the result of a fuel-fed fire. As I was touching the fuel lines to check them, I discovered that one of them was completely unconnected. I investigated further and found that the fuel line coupling was intact but that the fuel line had separated completely from the coupling. This separation occurred in an area which is difficult to see from normal viewing angles. However, it was obvious that the coupling was still attached to the fitting on the fuel rail and that the hose was slightly frayed on the free end and not connected to the coupling.

The fibers on the outer cover on the fuel line were burned, and the ribbed rings on the connector were soot covered. The observations indicate the connector and fuel line separated before the fire, not as a result of post-fire movement during extinguishment or other events.

I could not determine if the separation occurred at once or if it started with a small fuel leak and progressed as the fire burned. I decided to not remove any components although component removal would have made it easier to photograph the fuel lines and their adjacent components.

**Undercarriage:**

I found no evidence to indicate the fire began under the vehicle and spread upward. The strong odor of gasoline I detected was concentrated in the soil below the right side of the firewall. There was no evidence of fuel odor coming from the vehicle — it was coming from the soil.



**Tire and Wheels:**

The rear tires and wheels were not damaged by the fire. The left front tire and wheel have some damage, but the left front tire was not deflated by the fire. The right front tire and wheel were extensively damaged by the fire.

**Area of Origin:**

This fire originated in the engine compartment. The cause of the fire was the ignition of gasoline vapors which escaped from the disconnected fuel line while the engine was operating.

No other areas of origin were found. The damage within the cab was found to be the result of flames spreading into the cab from two directions: through the firewall and through the windshield.

**Method of Ignition:**

The most likely source of ignition is a spark from the pickup's ignition system or a spark within the pickup's alternator. Another ignition source would be heated exhaust or engine surfaces. However, it is more likely the fire was ignited by a spark.

No evidence was found to suggest this fire was intentionally caused. All six spark plug wires were in position and connected to plugs. The rubber boot on the #6 spark plug is of a different shape than the other boots, but it was not disconnected.

**Recalls and Bulletins:**

I searched National Highway Traffic Safety Administration (NHTSA) files by computer to look for recalls, service bulletins, and customer complaints on 1996 Ford F-150 pickups. I found no records pertaining to fires caused by suspected fuel hose leaks.

**Physical Evidence:**

During this investigation, I collected three items of evidence. I collected a sample of soil, labeled as Sample 1, from the ground below the area of origin. I collected a sample of engine oil by means of a vacuum pump. Both of these samples were taken in case someone later determines that a sample of either would be helpful to follow-up on this fire loss. I also collected the evaporator from the air conditioner — in the event that someone later decides to examine the damage to the aluminum housing and fins.

**Contact with the Insured:**

I had no contact with the insured or with his nephew during this investigation.

**Contact with Other Persons:**

While I was working at the fire scene, [REDACTED] West Plains, Missouri — telephone [REDACTED] came to the scene. [REDACTED] said he is the owner of the land where the fire occurred. He also indicated he was the person who discovered the fire. Furthermore, he said he is the assistant fire chief of the Peace Valley — White River Fire Department.

[REDACTED] said he was operating a tractor on his land across from the fire location. As he was driving east toward the highway, he noticed smoke coming from the rear of the dwelling. He drove his tractor toward the dwelling to investigate the source of the smoke. He said the occupant, the insured's nephew, was an over-the-road truck driver and was out of town when the fire occurred.

[REDACTED] said when he drove into the yard behind the dwelling, he observed the insured's pickup parked in a northbound direction behind the dwelling. He could also see flames burning up from the ground under the right side of the engine compartment. He said there was no fire in the passenger compartment when he first saw the vehicle.

He parked his tractor and hollered for the insured whom he believed was in the area since he recognized the pickup. [REDACTED] said [REDACTED] came out of a nearby barn where he had been looking for some tools. [REDACTED] said [REDACTED] tried to raise the hood so [REDACTED] could use a nearby garden hose to extinguish the fire. [REDACTED] said they could not get the hood raised completely, and the fire continued to increase.

[REDACTED] drove his tractor back to his house — across the street from the fire scene — and got his pickup so he could drive to the fire station. He used the fire department radio unit in his pickup to summon the fire chief while responding to the fire station. [REDACTED] returned to the scene with the fire engine and successfully extinguished the fire. The fire chief arrived shortly thereafter.

[REDACTED] identified the fire chief as Steve Clegborn (417-277-5734). [REDACTED] said the fire chief told him he believed the fire began in the right rear area of the engine compartment. I told the assistant chief that I concurred with the fire chief's findings.

1996 Ford F-150

Insured

said told him the pickup's engine was running as he only intended to be inside the barn long enough to get a tool. said told him he was working on a race car and had driven to his nephew's home to get a tool.

said the engine was not running when he got to the scene, but this would not be unusual given the reduction in fuel supply and pressure which resulted from the separation in the fuel line. The engine could also have stopped due to electrical problems created by the heat from the fire. However, it is probable that the engine stopped from a loss of fuel pressure.

I asked about the contents in the pickup's bed. These items included six empty quart containers of Valvoline oil, a Fram oil filter box, a container of Gunk Performance Booster, and several crankshaft bearings. said owned a machine shop and that he also built race cars. He said he believed these materials had been tossed into the back of the pickup while had been working on a race car.

I have not spoken with other persons regarding this fire loss.

**Second Inspection:**

On May 23, 1997, I examined this vehicle a second time in order to verify my initial observations. This second inspection occurred after the vehicle was taken to the Southern Missouri Insurance Pool. Sunset occurred while I was conducting my initial examination, and I reinspected the vehicle during natural light. I photographed portions of the vehicle during this second inspection, and I secured the hood in the closed position by using a chain and padlock. I provided one of the padlock's two keys to Steve Gerety, owner of the Southern Missouri Insurance Pool, and I delivered the other key to the State Farm Insurance Company's Deerfield Service Center to the attention of Roger Akins, State Farm Claim Specialist. I provided these keys to these individuals in the event that an authorized person would need to open the hood and inspect the components and damage.

I did not send a key to Valerie Kisse in West Plains because the vehicle is in Springfield, and I contacted Roger Akins and obtained his permission to provide him with one of the two keys.

My second inspection strengthened my initial opinions. I found nothing contradictory, and I noted no visible changes to the vehicle as a result of it having been towed to the salvage yard.

AFF # F97-03318

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State Farm # 25-5016-768

EA05-005-LC-0136

### OPINIONS AND CONCLUSIONS

The soil below the starter motor assembly exhibited a strong odor like that of gasoline. The area of greatest concentration of fuel in the soil was below the right side of the firewall. This is just to the right of the location of the fuel fittings at the top of the rear of the engine. The fire patterns on and within the vehicle coincide with the discovery of the unconnected fuel line and the observations made by the assistant fire chief who discovered the fire.

No other causes for this fire were located. No evidence was found to suggest that this fire was intentionally caused.

I did not remove the fuel lines from the vehicle even though that would have made it easier to examine them. I examined the vehicle twice, left the fuel lines in place so other persons could examine them, and secured the hood in the closed position to protect the engine compartment from unauthorized access.

I am unable to state why the fuel line separated from the connector, but the separation resulted in the dangerous release of gasoline vapors which caused the fire. No other causes for this fire were found.

Any questions about this investigation should be directed to me. I will not release the information within this report without the express permission of the client for whom this investigation has been conducted or unless directed to do so by subpoena or court order.

This is a confidential report.

AMERICAN FIRE INVESTIGATIONS

**COPY**

Phil Johnston  
Certified Fire Investigator

PJ:ih

1996 Ford F-150

Insured



1 This photo shows the vehicle in the location in which the fire occurred. The insured's nephew's residence is to the right or west of the vehicle, and the camera was unable to completely adjust between the dark shadow and the reflected sunlight from the white paint on the vehicle. A-1

AF1 # F97-03318

Photo 1

State Farm # 25-5016-763

ERG-885-LC-8138

1996 Ford F-150

Insured



2 The fire patterns indicate the greatest damage to the exterior surfaces are located on the right front fender, the hood, and to the right side of the grille and front bumper. The right front tire was extensively burned by the fire. A-3

AFI # F97-03318

Photo 2

State Farm # 25-5016-768

ER05-005-LC-0139

1996 Ford F-150

Insured



3 The greatest damage to the hood's upper surface was in the right half. The cowl is burned more extensively over the right one-third. The windshield is burned completely on the right side, and the right windshield wiper arm is burned much more than the left arm.

From the exterior — without raising the hood — it is evident the fire caused much more damage in the right half of the engine compartment area. A-8

AFI # F97-03318

Photo 3

State Farm # 25-3016-768

ENR5-005-LC-8140





1996 Ford F-150

[REDACTED], Insured



5 The examination of the passenger compartment revealed no evidence that the fire originated in the left half. A-10

AFI # F97-03318

Photo 5

State Farm # 25-5016-768

ER05-005-LC-0142

1996 Ford F-150

Insured



6 The vehicle's fuse panel was examined. Five of the fuses were found in the "open" position. These were fuses #8, #9, #10, #13, and #16. All of these — except for fuse #13 — provided protection for circuits which were primarily for cab and passenger area circuits. The fifth fuse provided protection for circuits located inside and outside the cab. No evidence was found during this investigation that electrical circuits, wiring, or components caused this fire. B-14a

AFI# F97-03318

Photo 6

State Farm # 25-5016-768

ENG-885-LC-8143

1996 Ford F-150

Insured



7 The fire damage to the right half of the cab was much greater than the damage to the left half. An odor like that of gasoline was detected while examining the right side floor area. A-11

AFI # F97-03318

Photo 7

State Farm # 25-5016-768

EP05-005-LC-6144

1996 Ford F-150

Insured



8 The contrast in damage between the left and right areas of the dash is quite evident. The ignition key was still in the switch. A-15

AF1 # F97-03318

Photo 3

State Farm # 25-3016-768

ER05-005-LC-0145

1996 Ford F-150

Insured



9 The greatest and lowest area of fire damage within the cab was found along this side of the firewall — at the point where the heater assembly was located on the firewall. The metal firewall was extensively burned in the area indicated by the arrow. This is an indication of intense flames in this area — especially on the engine compartment side of the firewall. A-14

AFT # F97-03318

Photo 9

State Farm # 25-5016-768

EA85-005-LC-8148

1996 Ford F-150

Insured



10 The fire caused more extensive damage to the right side of the engine compartment than to the left. The owner of this property is the assistant fire chief of the local fire department. He was operating a tractor on the west side of the highway near this location when he observed smoke behind the insured's nephew's rental house. When he drove to the scene, the assistant fire chief saw flames falling to the ground along the right side of the firewall. The arrow points to the most intensely burned section of the firewall. This area is over the location in which the assistant fire chief observed flames. A-23

AFI # F97-03318

Photo 10

State Farm # 25-3016-768

ER05-805-LC-8147

1996 Ford F-150

Insured



11 The fire damage to the right half of the firewall is much greater than that on the left side. There are soot deposits in the left side of the firewall and on the left rear area of the underside of the hood. However, the fire was so intense on the right underside area of the hood and around the right half of the firewall that flames burned the carbon before it could produce soot deposits on the heated metal surfaces. Rubber hoses and wire insulation were burned much more in the right half of the engine compartment than in the left. The greatest damage occurred in an area of minimal wiring and fewer components — because the fire resulted from a separated fuel line. Gasoline escaped from the fuel line under pressure and was ignited by a spark or heated engine surface. B-24a

AFI # F97-03318

Photo 11

State Farm # 25-5016-768

2025-005-LC-6148

1996 Ford F-150

Insured



13 The fire damage is greatest around the upper arrow which points to the location of a fuel line which separated at the coupling. The separation resulted in gasoline escaping under pressure while the vehicle's engine was operating while the insured was inside a nearby barn.

The lower arrow points to the area in which the right fender well was located before the fire. Both front fender wells were completely consumed by the flames — a very unusual observation in most vehicle fire investigations. A-24

AFI # F97-03318

Photo 12

State Farm # 25-5016-768

ERG5-005-LC-0149

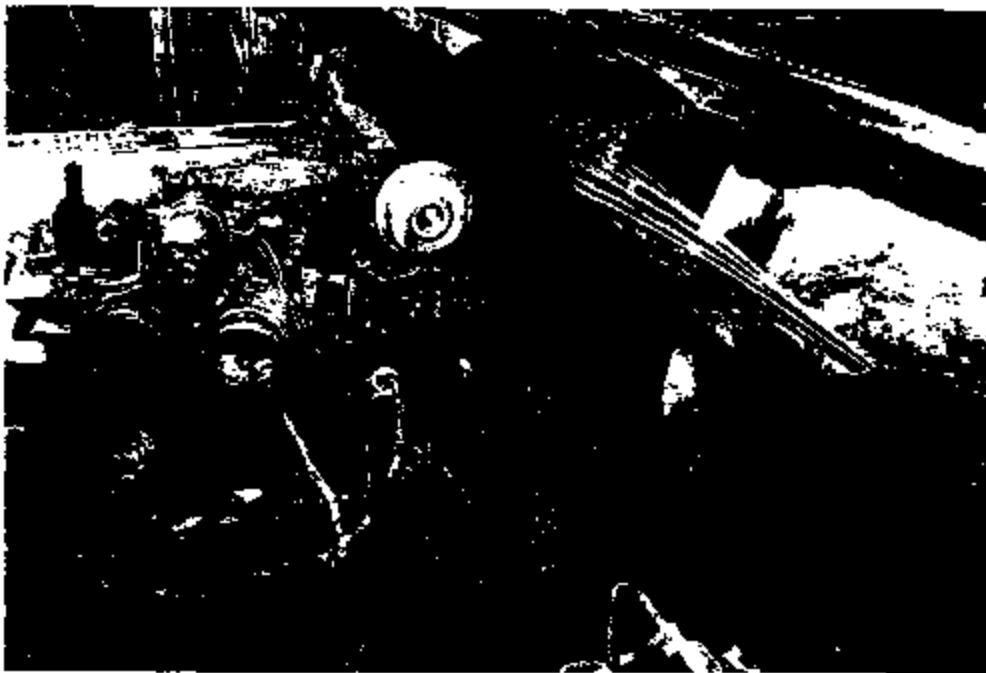




13 Rubber hoses and wire insulation were more evident in the left front quadrant than in other areas — because the fire originated in the rear of the engine when the fuel line indicated by the arrow separated from the coupling and allowed pressurized gasoline to escape and be ignited. The fuel line was oriented toward the right side of the engine compartment, and this resulted in burning gasoline being projected toward the right side along the rear of the firewall. The arrow points to the fuel system supply and return lines which extended down from the rear of the engine. A-25

1996 Ford F-150

Insured



14 The fuel line which separated from the coupling was not removed from the vehicle. It was left in place so that personnel from State Farm Insurance Company or other persons could examine it. The arrow points to the section of the separated fuel line which is visible from the driver's side of the engine compartment. B-2a

AF1# F97-03318

Photo 14

State Farm # 25-5016-763

EA25-205-LC-8151

1996 Ford F-150

insured



15 The arrow points to the "free" end of the fuel line which separated from its coupling. The Ford® fuel line retainer clips were in position during the fire. They have not been removed during this investigation. B-7a

AFT # F97-03318

Photo 15

State Farm # 15-5016-768

EN05-005-LC-6192

1996 Ford F-150

Insured



16 Because of the strong gasoline odor present under the vehicle and the assistant fire chief coming to the scene and indicating he saw flames falling down under the rear area of the engine compartment, a sample of soil was collected. The sample was selected by using this gas/vapor detector to find an area where the concentration appeared to be greatest.

The right front tire was extensively burned as a result of the gasoline which was flowing and burning within the right rear quadrant of the engine compartment. B-3a

AFI # F97-03313

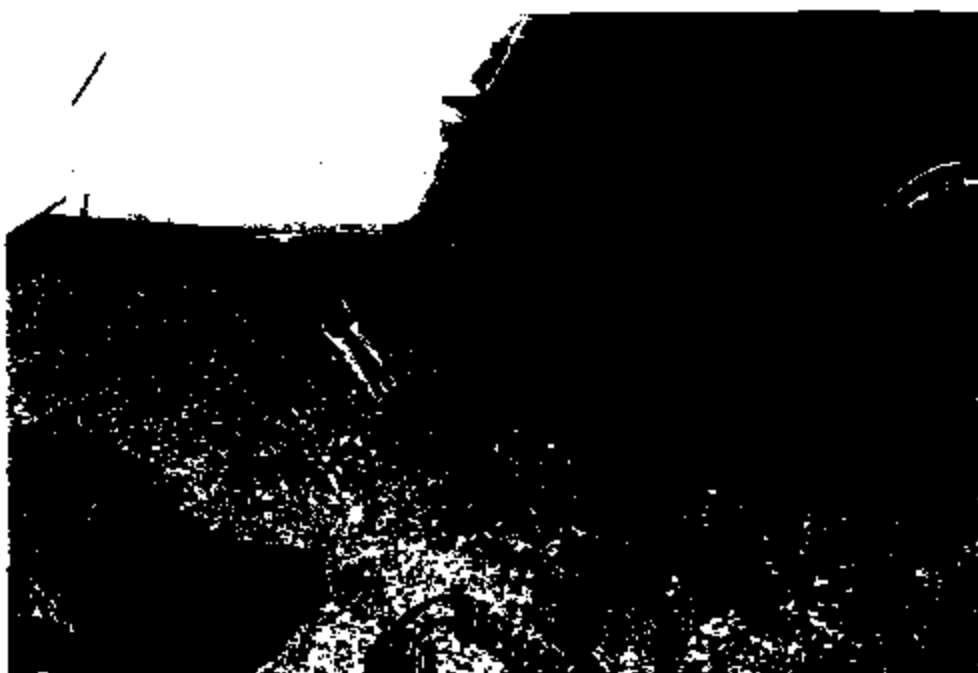
Photo 16

State Farm # 25-5016-768

ER05-005-LC-8183

1996 Ford F-150

[REDACTED], Insured



17 Sample A was collected and made ready for delivery to a testing lab — in the event that an analysis of the soil was necessary in order to confirm the presence of gasoline. At the present time, this sample has not been sent for testing. It is being kept as evidence in the event that such testing is required. B-10a

AFI # F97-03318

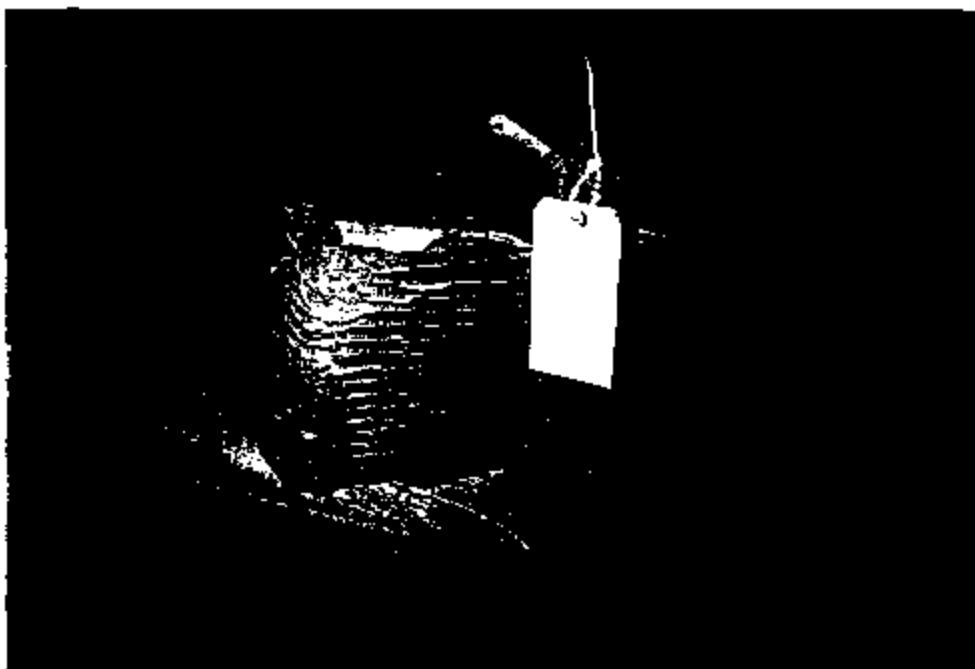
Photo 17

State Farm # 25-5016-768

ER05-005-LC-0154

1996 Ford F-150

Insured



18 The aluminum fins on the air conditioning evaporator were partially melted and burned by the intense heat from this fire. This component was found on the ground on the right side of the engine block. It was tagged as evidence and is presently stored with the soil collected as Sample A. B-23a

AP1 # F97-03318

Photo 13

State Farm # 25-5016-768

ER05-025-LC-0153

1996 Ford F-150

Insured



19 A sample of engine oil was collected during this investigation. This sample has been preserved, but it has not been sent for testing. The fluid was removed by use of a vacuum pump. A-26

AF1# F97-03318

Photo 19

State Farm # 25-5016-768

0005-005-LC-0156

1996 Ford F-150

[REDACTED] Insured



20 The vehicle was initially examined at the fire scene — the insured's nephew's property. The vehicle was later transported to the Southern Missouri Insurance Pool where it was again examined during better lighting. C-1

AFI # F97-03318

Photo 20

State Farm # 25-5016-768

EOSS-009-LC-8157



1996 Ford F-150

Insured



21 The vehicle's engine compartment looked no different after the vehicle was transported than it did before it was relocated to Springfield. A comparison of Photographs 13 and 14 with this one show the fuel lines have the same alignment after relocation of the vehicle. C-5

AFI # F97-03313

Photo 21

State Farm # 25-5016-768

EP95-605-LC-615g

1996 Ford F-150

Insured



22 The arrow points to the fuel line connector which is not connected to its corresponding fuel line. The clip which holds the connector in place is still attached to the connector. However, the fuel line blew out.

The "unconnected" fuel line is visible just below the connector indicated by the arrow. C-3

AFI # F97-03318

Photo 22

State Farm # 25-5016-768

ENC-803-LC-8150



23 The right arrow points to the connector which is not attached to its fuel line. The left arrow points to the connector which is still attached to its fuel line. These lines are components of a pressurized fuel system which is capable of releasing considerable gasoline vapors, and this is exactly what occurred when the fuel line separated from its connector.

The gasoline vapors most likely were ignited by an ignition system spark or by contact with a heated exhaust or engine surface. C-12

1996 Ford F-150

Insured



24 After the fire investigation was completed, the hood was secured in the closed position by means of this padlock and chain. This additional security was taken because the vehicle is located in a yard where prospective buyers can raise hoods and inspect vehicles before bidding on them. In order to prevent anyone from disturbing the engine compartment, the hood was secured in this manner. C-15

AFI # F97-03318

Photo 24

State Farm # 25-5016-768

ERG5-885-LC-8161

## Photo Log — Series A — March 31, 1997

- 1 Left side of vehicle
- 2 Front of vehicle
- 3 Front & right side of vehicle
- 4 Front of vehicle
- 5 Rear & right side of vehicle
- 6 Rear of vehicle
- 7 Contents of bed
- 8 Top of hood
- 9 VIN ID decal — VIN 1FTRF15Y3T [REDACTED]
- 10 Instrument panel & steering wheel area — left side of dash
- 11 Right side of dash
- 12 Ford vehicle/options label
- 13 Corner of Ford vehicle/options label
- 14 Passenger compartment & right side of floor — viewed from right door opening
- 15 Steering wheel, instrument panel & adjacent areas
- 16 Firewall inside passenger compartment — right side
- 17 Passenger compartment — center of dash & adjacent area
- 18 Ignition key & Friendly Ford tag
- 19 Label on Friendly Ford tag (96 F150 White Z8155)
- 20 Contents of bed
- 21 Underside of hood — in raised position
- 22 Underside of hood & engine compartment
- 23 Engine compartment, grille area & front bumper
- 24 Engine compartment — right oblique view
- 25 Engine compartment — left side view
- 26 Engine oil sample collection
- 27 Engine oil sample — after collection
- 28 Engine compartment — right side of engine & adjacent starter area
- 29 Firewall & right rear corner of engine
- 30 Battery & associated wiring/components
- 31 Front of engine
- 32 Left side of engine
- 33 Power distribution center & associated wiring
- 34 Engine compartment components on ground in front of right side of firewall
- 35 Right front tire & adjacent areas
- 36 Components on ground below right front side of firewall — after relocation
- 37 Copper wiring from engine compartment

Photo Log — Series B — March 31, 1997

- 0a Evaporator core — air conditioning system
- 1a Underside of hood
- 2a Left rear of engine & adjacent firewall area
- 3a Fuel line coupling at rear of engine
- 4a Right rear lower side of engine
- 5a Top rear of engine — at firewall
- 6a Fuel line connector at rear of engine
- 7a Loose fuel line at rear of engine
- 8a Sample A location — before collection — viewed outside vehicle
- 9a Sample A location — before collection — viewed over engine compartment
- 10a Sample A after collection — viewed outside vehicle
- 11a Sample A after collection — viewed over engine compartment
- 12a Ignition key in ignition switch — forward/start position
- 13a Ignition key in ignition switch — accessory position
- 14a Fuse panel — left side of dash
- 15a Cover/label for fuse panel
- 16a Fuse panel — left side of dash
- 17a Engine compartment — left rear quadrant
- 18a Front of vehicle — right oblique view
- 19a Engine compartment — firewall at rear of engine
- 20a Heater blower motor on ground beneath vehicle
- 21a Underside of heater blower motor debris found on ground under vehicle
- 22a Vacuum connector in debris below vehicle
- 23a Evaporator core — with evidence tag attached
- 24a Firewall & underside of hood

1996 Ford F-150

[REDACTED], Insured

Photo Log — Series C — May 23, 1997

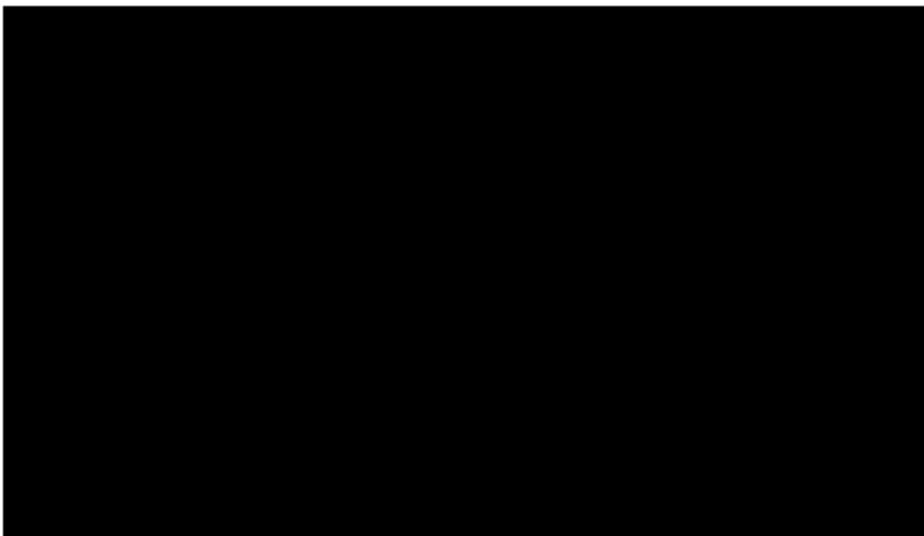
- 1 Vehicle after relocation to SMIP — left front oblique view
- 2 Engine compartment
- 3 Fuel connection on rear of fuel rail
- 4 Fuel connection on rear of fuel rail
- 5 Fuel lines to rear of fuel rail
- 6 Fuel lines to rear of fuel rail
- 7 Firewall above right front floor area
- 8 Threaded valve stem on fuel rail
- 9 Fuel connection on rear of fuel rail
- 10 Fuel connection on rear of fuel rail
- 11 Fuel connection on rear of fuel rail
- 12 Fuel connections on rear of fuel rail
- 13 Chain and padlock — before installation
- 14 Chain and padlock in position on vehicle
- 15 Chain and padlock in position on vehicle.

AFI # F97-00010

Photo Log C

State Farm # 25-5016-768

EM5-025-LC-8184





STATE OF LOUISIANA \*\*\*\*\* PARISH OF LASALLE

28<sup>TH</sup> JUDICIAL DISTRICT COURT

FILED: \_\_\_\_\_

VERSUS NO: \_\_\_\_\_

FORD MOTOR COMPANY

BY: \_\_\_\_\_  
DY. CLERK OF COURT

PETITION FOR DAMAGES

NOW INTO COURT, through the undersigned counsel, comes [REDACTED]

[REDACTED], hereinafter referred to as [REDACTED], a

[REDACTED] corporation authorized to do and doing business within the State of Louisiana,

and [REDACTED] a major resident of LaSalle Parish, Louisiana, who with due respect petition

this court as follows:

1.

Named defendant herein is FORD MOTOR COMPANY, a foreign corporation authorized to do and doing business within the State of Louisiana.

2.

FORD MOTOR COMPANY, is liable unto Petitioners for all damages reasonable in the premises for the reasons which will hereinafter be set forth, with legal interest thereon from date of judicial demand until paid and for all costs of this proceeding.

3.

Prior to July 29, 2004, Farm Bureau had issued a policy of insurance, policy [REDACTED], to Brett Cooper which was an automobile policy containing policy provisions which insured Brett Cooper's 2001 Ford F-150 XLT, VIN# 1FTRW08L11K [REDACTED]. Said policy provided coverages which covered Brett Cooper for collision, fire, or destruction of said 2001 Ford F-150 XLT pickup

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truck. Said policy was in full force and effect on July 29, 2004.

4.

This aforesaid vehicle was manufactured by the Defendant, FORD MOTOR COMPANY. At the time the vehicle left the control of FORD MOTOR COMPANY, said vehicle contained vices or defects as further described herein.

5.

On or about July 29, 2004, [REDACTED] was driving the aforesaid 2001 Ford F-150 XLT pickup truck in LaSalle Parish, Louisiana. [REDACTED] began to smell gasoline and suddenly, without warning, fire erupted from the engine compartment in the area of the fuel lines resulting in a fire which caused the vehicle to catch fire, causing damage to said 2001 Ford F-150 XLT pickup truck totaling \$23,229.80.

6.

As a result of said fire and damage to the aforesaid vehicle, Farm Bureau paid \$23,129.80, while [REDACTED] sustained a \$100.00 deductible. Having paid the above said amount, Farm Bureau is legally and conventionally subrogated to all rights as held by its insured, to the extent of said payments.

7.

The aforesaid 2001 Ford F-150 XLT pickup contained vices and defects including redhibitory defects which rendered the vehicle so useless that [REDACTED] would not have purchased the vehicle had he known of the defects. Said redhibitory defects existed in the vehicle on the date of the manufacture by Ford Motor Company.

8.

The aforesaid 2001 Ford F-150 XLT pickup truck was defective and unreasonably dangerous for the uses for which it was intended and the Defendant, Ford Motor Company, is liable unto Plaintiff on the basis of redhibition, negligence and fault, strict liability, and under the Louisiana Products Liability Act, R.S. 9:2800.51, et seq, in that said 2001 Ford F-150 XLT pickup truck was unreasonably dangerous in design; was unreasonably dangerous in construction and composition;

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EA05-085-LC-6287

was unreasonably dangerous because an adequate warning about the product had not been provided; and said vehicle was unreasonably dangerous because it did not conform to an express warranty of the manufacturer and seller about the product.

9.

Additionally, Defendant, Ford Motor Company, was negligent and strictly liable, which negligence and strict liability was a direct and proximate cause of the damages sustained by Brett Cooper and Farm Bureau which consisted particularly, but not exclusively of the following acts of negligence:

1. Manufacturing, selling, and improperly installing an unreasonably dangerous and defective vehicle which contained defects in the fuel supply line which could cause a fire in the vehicle;
2. Selling and putting on the market a vehicle which had defective interior components;
3. Failing to discover that which they should have discovered or act reasonably upon that which was discovered;
4. Knowingly or negligently placing a hazardous product in the stream of commerce when they knew, or when exercising ordinary care, should have known, that users could or would be damaged;
5. In failing to warn purchaser of the defective condition of said vehicle;
6. Failing to warn purchasers and users of said vehicle of the defective fuel components; and
7. Other acts of negligence which will be more fully and particularly shown at the trial of this matter.

10.

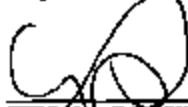
The doctrine of res ipsa loquitur is applicable, thereby shifting the burden of proof to the Defendant, Ford Motor Company, to free itself from fault and negligence in this matter.

WHEREFORE, PETITIONERS, LOUISIANA FARM BUREAU CASUALTY INSURANCE COMPANY and [REDACTED] PRAY that after all due proceedings are had, there be judgment herein in favor of the Plaintiffs, and against the Defendant, FORD MOTOR COMPANY, for all damages reasonable in the premises, with legal interest thereon from date of

judicial demand until paid, and for all costs of this proceeding.

FURTHER PRAYS for general and equitable relief.

Respectfully submitted,



---

TERRY M. DOUGHTY, #14229  
COTTON, BOLTON, HOYCHICK  
& DOUGHTY  
P.O. BOX 857  
607 MADELINE ST.  
RAYVILLE, LA 71269  
Telephone: (318)728-2051  
FAX: (318)728-5293  
ATTORNEY FOR LOUISIANA FARM  
BUREAU CASUALTY INSURANCE  
COMPANY AND BRETT COOPER,  
PLAINTIFFS

PLEASE SERVE:

FORD MOTOR COMPANY  
Through Its Agent For Service Of Process  
CT CORPORATION SYSTEM  
8550 United Plaza Blvd.  
Baton Rouge, LA 70809

**BOLEN INVESTIGATIVE SERVICES**  
130 CAMELLIA LANE  
PINEVILLE, LA. 71360

CASE INFO:

INSURANCE COMPANY:	FARM BUREAU, INC.	CLAIM #:	[REDACTED]
CLAIMANT:	[REDACTED]	PHONE #:	[REDACTED]
ADDRESS:	[REDACTED], LA. [REDACTED]	REF #:	2004-019
TYPE OF FIRE:	2001 FORD F-150 XLT 4X4 CREW CAB	DOL:	07-29-2004

REPORT: PAGE 1 OF 5

**EXTERIOR VEHICLE FIRE INVESTIGATION:**

Upon arriving at storage facility at approximately 0800hrs on 08-04-2004, an exterior size up of the vehicle damage was performed starting with the rear view of the truck. Vehicle description appeared to be consistent with assignment information, with verification of VIN number obtained from driver's side, front door during overview and size up of vehicle damage.

Exterior, rear view of vehicle indicates tailgate and truck bed area in good condition, with minimal smoke stains visible to the area as a result of the fire. Tailgate and rear bumper areas appear in good condition with no visible damage to the area as a result of the fire. Upper levels of rear cab window appear heavily damaged by flame impingement with lower levels of rear cab window remaining in good condition at time of fire. Fire patterns in this area indicate interior cab fire venting through upper levels of rear window of truck at time of fire.

Exterior investigation continued to right side view of rear quarter panel area of vehicle. Right, rear view of truck indicates body panels in good condition with visible paint, striping, and molding remaining in tact at time of fire. Fire patterns appear near front cab door and appear to lead towards front quarter panel fender area from this view of the vehicle. Right, front view of vehicle indicates fire patterns coming from interior, front door cab area and front fender well areas of the truck. These patterns appear separated, indicating interior cab fire vented through front door window area and interior, engine compartment fire vented through front fender well and hood assembly at time of fire. No visible patterns of low-level burning were indicated on this side of the truck, as lower doors and front fenders remained in tact with visible paint and moldings observed in the area at time of fire. Tires appear in good condition with minimal damage noted to front, right tire as a result of the fire.

Exterior investigation continued to left side view of vehicle. Left view of truck indicates no visible damage to rear quarter panel and rear tire area of vehicle as a result of the fire. Fire patterns appear visible to upper levels of rear cab door indicating point of ventilation from interior cab fire. Front door burn patterns indicate high-level heat, and flame impingement from interior cab venting through front door window area of vehicle. Fire patterns indicate lower-level damage to door panel than observed to right side of truck, with severity of damage observed to front of exterior door panel at time of inspection. Burn patterns continue towards front, left quarter panel of truck. Front fender well indicates fire patterns suggesting an extension of fire damage from interior engine compartment fire through wheel well ventilation point over front tire. Radial burn patterns to exterior fender indicate flame impingement to front tire from within the fender well area leading towards interior engine compartment.

**BOLEN INVESTIGATIVE SERVICES**  
130 CAMELLIA LANE  
PINEVILLE, LA. 71360

PAGE 2 OF 5

**EXTERIOR VEHICLE FIRE INVESTIGATION: (CONTINUED)**

Exterior investigation progressed to front view of vehicle. Front view of truck indicates heavy damage sustained to interior engine compartment with no visible remains of hood assembly observed at time of inspection. Complete hood involvement indicates possible area of origin inside interior engine compartment at time of fire. Front grill assembly appears heavily damaged from interior engine compartment as a result of fire. High-level damage to front windshield area indicates interior cab involvement at time of fire. Visible fire patterns to upper, bulkhead area and lower windshield indicate fire possibly originated inside interior engine compartment, spreading to interior cab as an extension of fire from this area.

Exterior investigation continued to bottom view of vehicle. Front view of underside, suspension and vehicle frame indicates heavy damage to driver's side of truck and overall engine compartment area as a result of the fire. No evidence of engine oil leaks or transmission problems was observed at time of inspection. Burn patterns to undercarriage indicates heavy fire damage to rear engine block area and driver's side of vehicle as a result of the fire. Fire patterns dissipate behind bulkhead area with no visible damage observed under cab and truck bed areas of the vehicle as a result of the fire. Burn patterns along frame-rails indicate fuel line involvement near front of driver's side door indicating available accelerants may have been introduced into the area at time of fire.

Exterior investigation continued to top view of vehicle. Top view of truck bed, storage area indicates no visible damage as a result of the fire. Truck bed appears clean and in good condition with bed-liner and rubber floor mat observed in good condition at time of inspection. Top view of vehicle cab indicates burn patterns from interior passenger compartment with areas of severest damage observed to upper-level, front doors and driver's side, front windshield areas of cab roof. Top view of front hood area indicates severe burn patterns coming from the interior engine compartment at time of fire. Front windshield and upper-level bulkhead assembly indicates heat and flame impingement patterns leading to left, central, rear engine compartment as a possible area of origin for the fire.

**INTERIOR VEHICLE FIRE INVESTIGATION:**

After examining the exterior vehicle burn patterns, an interior vehicle investigation was started. Interior investigation was started in the rear cab, passenger compartment. Rear cab door burn patterns indicate equal burning at mid-door level with areas of protected plastic identified adjacent to rear seats of vehicle. Burn patterns indicate high-level extension of flame impingement from front passenger compartment of interior cab at time of fire. High-level burn patterns to rear seat cushions indicate rollover flames and radiant heat was applied to the area through interior cab involvement from the front passenger compartment at time of fire. Floor level inspection of rear cab indicates carpet and floor mats in good condition with evidence of radiant heat damage noted to the area as a result of the fire. Fire appears to have vented through rear door windows allowing for heat and flames to escape interior cab of vehicle in this area. A roll of toilet paper was identified under the passenger, rear seat, with heat and smoke damage observed to the top of the paper indicating minimal, low-level damage to this area of the vehicle.

EA85-885-LC-5211

BOLEN INVESTIGATIVE SERVICES  
130 CAMELLIA LANE  
PINEVILLE, LA. 71360

PAGE 3 OF 5

INTERIOR VEHICLE FIRE INVESTIGATION: (CONTINUED)

Interior investigation continued to front passenger compartment of the vehicle. Front, right side of passenger cab indicates burn patterns coming from bulkhead and dash areas of interior cab. Glove box remains appeared partially in tact indicating flame impingement was primarily located above this level of the cab in this area. Burn patterns to upper-cab roof indicate equal heat damage to rear seating areas leading to localized patterns above driver's side of front cab area. Front seats appear burned from the front and the top, indicating direction of fire from the dash and bulkhead area at time of fire. Dash-level components appear melted to floor level, protecting carpet and floor mats in front seat area of vehicle. Dash and bulkhead burn patterns lead to driver's side brake and throttle control pedals indicating point of entry for fire through bulkhead access holes in forward driver's side floor. V patterns in this area indicate fire came into front cab area from steering column, brake, and throttle control pedals under this side of dash as a result of fire extension into the area at time of fire. No evidence of electrical problems was observed inside the cab of the vehicle. Wiring harnesses appeared in tact and in good condition at time of fire, with no visible evidence of shorting or arcing in the area. Front cab flooring appeared in good condition with evidence of carpet and floor mats in tact at time of fire. No evidence was observed of low-level burn patterns to indicate any floor-level fire inside the truck at time of fire.

INTERIOR ENGINE COMPARTMENT INVESTIGATION:

After examining exterior vehicle and interior cab areas, interior investigation progressed to engine compartment area of vehicle. Engine compartment appeared severely damaged as a result of the fire. Heavy damage to top of engine block and left side of engine compartment indicates fire originated at high levels and possibly near rear of engine block. Melting patterns observed to front of engine block components indicate fire originated near rear of engine block. Battery appeared in good condition with proper terminal connections observed to the wiring remains in the area. Radiator appeared severely damaged with heavy heat applied from rear of engine block and top of radiator at time of fire. Engine oil level was checked and appeared to be in good service condition at time of fire. Transmission fluid was undetermined due to severity of damage to dipstick at time of inspection.

Burn patterns to top area of engine block indicate severe damage to throttle body and upper heads of engine block as a result of the fire. Master cylinder appeared melted from heat and direct flame impingement in the area with V patterns indicating origin near rear, bulkhead area of left, central engine block. Fuse box appeared in tact with no evidence of electrical problems from shorting or arcing was observed in the area. Wiring harnesses appeared in tact and in good condition at time of fire with no evidence of arcing or shorting observed to vehicle wiring at time of inspection.

Burn patterns identified on rear bulkhead of engine compartment indicate specific V pattern leading to left, central, rear engine block area. Closer examination of this area indicates dual, braided, fuel lines with unusual burn patterns to fuel injector connections in this area. Burn patterns to bulkhead insulation indicates V pattern leading to this fuel line area as a possible point of origin for this fire.

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130 CAMELLIA LANE  
PINEVILLE, LA. 71360

PAGE 4 OF 5

INTERIOR ENGINE COMPARTMENT INVESTIGATION: (CONTINUED)

Debris removal and reconstruction of engine block area revealed burn patterns consistent with accelerated, raw fuel fire at restr, left central bulkhead and engine block area. Patterns of splattering appear on bulkhead indicating raw fuel pumping at fuel injector connection at time of fire. Closer examination of fuel injector connections reveal outside fuel hose melting to connector fitting, and inside fuel hose possibly breaking at connection point with individually identifiable burn patterns to each fuel line. Heavy soot patterns, on inside fuel injector tube connection, indicate raw fuel too rich to burn may have been escaping at connection.

WITNESSES:

A brief interview was conducted via telephone with the owner, [REDACTED], after investigating the fire scene. [REDACTED] stated he bought the truck approximately 1-1/2 years ago in November [REDACTED] stated he changed the battery after he bought the truck and has not had any problems with the vehicle since date of purchase. Vehicle maintenance, including oil changes and air filter changes, have been performed on scheduled intervals since date of purchase with no visible or reported problems with the truck. Fuel filters have never been changed to owner's knowledge. No aftermarket wiring was added and no electrical work had been performed to the vehicle prior to the fire. Owner stated vehicle was unmodified from the factory when he bought it and no changes or upgrades had been made prior to the fire. [REDACTED] advised the vehicle had not been wrecked to his knowledge and no physical damage to the body prior to the fire. Vehicle had approximately 33,000 miles on it when owner bought it and approximately 50,000 miles on it when it burned. Owner advised truck had a 5.4-liter V-8 and approximately 1/4 tank of gasoline. [REDACTED] stated he was driving down Hwy 127 with his windows down, at approximately 9:00pm, when he rounded a curve and smelled gasoline. [REDACTED] stated when he filled up the fuel tank completely, sometimes he would smell gas fumes in the truck, so he did not pay much attention to the smell. As [REDACTED] continued driving down the highway, he noticed the smell of gasoline again and realized his fuel tank only had 1/4 of a tank. [REDACTED] pulled onto the side of the road, near some dumpsters, and put the truck in park. [REDACTED] got out of the truck and proceeded to the hood latch area. When [REDACTED] opened the hood, he observed visible flames coming from the left, central area of the rear engine block and "firewall" area of the interior engine compartment. Visible flames were approximately 1 foot high and growing rapidly. [REDACTED] retrieved his cell phone from the interior cab and called 911 to report the fire and could only wait until fire department arrived on scene. Fire continued to grow and extend into the cab area until interior vehicle cab was fully involved with engine compartment fire. [REDACTED] stated he did not know what happened or how his vehicle caught fire; only that he smelled gas while he was driving down the road and decided to investigate. No further information was obtained by the owner at time of interview.

EPSS-803-LC-8213



**BOLEN INVESTIGATIVE SERVICES  
130 CAMELLIA LANE  
PINEVILLE, LA. 71360**

PAGE 5 OF 5

**CONCLUSION:**

The vehicle fire described and identified as a 2001, Ford F-150 XLT, 4x4, crew cab pick up, tan in color, bearing vin # 1FTRW08L1K appears to be accidental in nature based on identifiable burn patterns, debris removal, fire scene reconstruction efforts, and witness statements of the fire. The area of origin appears to be the interior engine compartment, near the left, central bulkhead area of the rear engine block. The point of origin appears to be adjacent to the braided fuel line connection to the fuel injector tubing at the rear, left cylinder coil on top of the engine block-assembly. Ignition source appears to be from energized electrical activity supplied by the cylinder coil during normal operation of the vehicle engine. Material first ignited appears to be raw fuel, in the form of gasoline, supplied under pressure from the fuel pump, as a result of mechanical failure in the braided fuel supply line at connection point to the fuel injector tubing adjacent to point of origin. No evidence of incendiary tactics was observed during course of investigation; and no other accidental or natural sources of ignition could be identified in the area of origin at time of investigation.

Witness statement identifies visible flames from area of origin, while engine was left running, after smelling odor of gasoline, consistent with a fuel leak in this area of the engine compartment. I would recommend further investigation by a licensed and certified electrical and mechanical engineer to verify exact causation of fire and possible mechanical failure analysis for this fire. This hereby concludes my investigation of the above listed property as assigned.

**ENG-003-LC-0214**



PRIVILEGED & CONFIDENTIAL

Office of the General Counsel

Ford Motor Company  
Parklane Tower West  
Suite 300  
Three Parklane Boulevard  
Dearborn, Michigan 48128-3568

December 14, 2004

Cotton, Bolton, Hoychick & Doughty, LLP  
PO BOX 857  
Rayville, LA 71269  
ATTENTION: TERRY DOUGHTY

Re: Claimant: [REDACTED]  
D/O/E: 07-29-04  
Vehicle: 2001 Ford F-150

Dear Mr. Doughty:

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

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

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

- 9. What was the city and state of occurrence: Jena, Louisiana
- 10. The 17 digit vehicle identification number: NA 1FTRW08L11K [REDACTED]
- 11. What was the mileage at time of occurrence: 50,000 miles
- 12. What is the alleged defect: Fuel supply line NA leak
- 13. Has the alleged defective part been repaired or replaced? (circle one) Yes or (No)

ERG5-685-LC-8215

14. What is the current location of the vehicle, and the alleged defective part(s)?  
Louisiana Salvage Pool 136 Gregory MC Lane, Monroe, LA
15. List all after market additions or modifications that were made to the vehicle:  
None
16. Was the engine running? (circle one) Yes or No
17. Were the keys in the ignition? (circle one) Yes or No
18. Was this vehicle purchased new or used? Used  
If purchased used, provide the date of purchase, mileage at the time of purchase, and from whom the vehicle was purchased: November, 2002. 33,000 miles. Obtaining info on purchase.

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

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

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

Sincerely,



Shawn L. Norton  
Claims Analyst /  
Litigation Assistant

PHOTO SHEET

Co. Claim No.: 703949

Insured: Farm Bureau Insurance

Owner: [REDACTED]

Our File No.: 2004-019

Taken By: Britt Bolen

Date: 08-04-2004

#1

Exterior, rear view of vehicle indicates upper-level cab damage as a result of the fire.

#2

Exterior, right, rear quarter panel view indicates visible burn patterns near front cab of vehicle.

#3

Exterior, right, front quarter panel indicates burn patterns coming from interior engine compartment area & fire of fire.



PHOTO SHEET

Co. Claim No.: 703949  
Insured: Farm Bureau Insura  
Owner:   
Our File No.: 2004-019  
Taken By: Britt Bolen  
Date: 08-04-2004

#4

Exterior, left, rear view of vehicle indicates burn patterns coming from front cab area @ time of fire.



#5

Exterior, left, front quarter panel view indicates burn patterns coming from interior engine compartment area @ time of fire.



#6

Exterior, front view of vehicle indicates burn patterns extending from interior engine compartment area @ time of fire.



PHOTO SHEET

Co. Claim No.: 703949  
Insured: Farm Bureau Insur  
Owner:  
Our File No.: 2004-019  
Taken By: Britt Bolen  
Date: 08-04-2004

#7

Exterior, bottom view  
of front vehicle area,  
indicates heavy damage to  
interior engine compartment

#8

Exterior, bottom view  
of rear vehicle area  
indicates no visible  
damage to the area as  
a result of the fire.

#9

Exterior, top view of  
rear vehicle bed or  
storage area appears in  
good condition & free  
of fire.



EXOS-MS-LC-0218

PHOTO SHEET

Co. Claim No.: 703949  
Insured: Farm Bureau Insura  
Owner:   
Our File No.: 2004-019  
Taken By: Britt Bolen  
Date: 08-04-2004

#10

Exterior, top view of cab area indicates heavy damage to front doors & front windshield area as a result of the fire. #11

Exterior, top view of front windshield & hood area of vehicle indicates heaviest damage sustained to interior engine compartment as a result of the fire.

#12

Exterior, top view of engine compartment area indicates heaviest damage to left side of rear engine block as a result of the fire.



ENG-023-1-C-6218

PHOTO SHEET

Co. Claim No.: 763949

Insured: Farm Bureau Insura

Owner: [REDACTED]

Our File No.: 2004-019

Taken By: Britt Bolen

Date: 08-04-2004

# 13

Exterior, rear cab view indicates evidence of flame impingement to upper levels of interior cab.

# 14

Interior view of left rear cab door indicates V pattern leading toward front, driver's seating area @ no evidence of low level burning in this area of cab @ time of fire.

# 15

Interior, left rear cab seating area indicates high level flame impingement in the area. Visible seat cushion & carpet remains reveals no evidence of low level burning in the area @ time of fire.





PHOTO SHEET

Co. Claim No.: 703949  
Insured: Farm Bureau Insura  
Owner:   
Our File No.: 2004-019  
Taken By: Britt Bolen  
Date: 08-04-2004

\*16

Interior, left, rear  
seating area indicates high  
level damage from flame  
impingement to the area  
from front cab @ time of fire.

Interior, right, rear  
cab door indicates high  
level damage from flame  
impingement @ V pattern  
leading to front cab area  
@ time of fire.

\*18

Interior, right, rear  
cab area indicates  
extension of fire damage  
from rollover heat & flame  
impingement coming from  
front cab area @ time of  
fire.



5005-405-1-C-0221

PHOTO SHEET

Co. Claim No.: 703949

Insured: Farm Bureau Insurance

Owner: [REDACTED]

Our File No.: 2004-019

Taken By: Britt Bolen

Date: 08-04-2004

#19

Interior, right, rear cab seating area appears to be extension of damage from front cab area of vehicle @ time of fire.

#20

Interior, right, rear cab seats indicate patterns of flameover from front cab area @ time of fire.

#21

Interior, rear cab floor indicates no evidence of low-level burning in the area @ time of fire.



PHOTO SHEET

Co. Claim No.: 703949

Insured: Farm Bureau Insura

Owner: [REDACTED]

Our File No.: 2004-019

Taken By: Brett Bolen

Date: 08-04-2004

#22

Interior view of upper-level, rear cab roof.

#23

Interior view of upper-level, front cab roof appears more severely damaged over driver's side front seat as a result of the fire.

#24

Interior, right, front cab door indicates high-level burn patterns @ V pattern leading towards dash area of vehicle.



PHOTO SHEET

Co. Claim No.: 703949  
Insured: Farm Bureau Insura  
Owner:   
Our File No.: 2004-019  
Taken By: Britt Hoken  
Date: 08-04-2004

#25

Interior, right front cab  
seating & dash area  
overview of vehicle.

#26

Interior, right front  
cab seat appears burned  
from the top, front  
area indicating fire  
came from dash area  
of vehicle, extending to  
interior passenger seat  
& time of fire.

#27

Burn patterns to front  
cab seats appear more  
severe towards driver's  
side of interior cab.

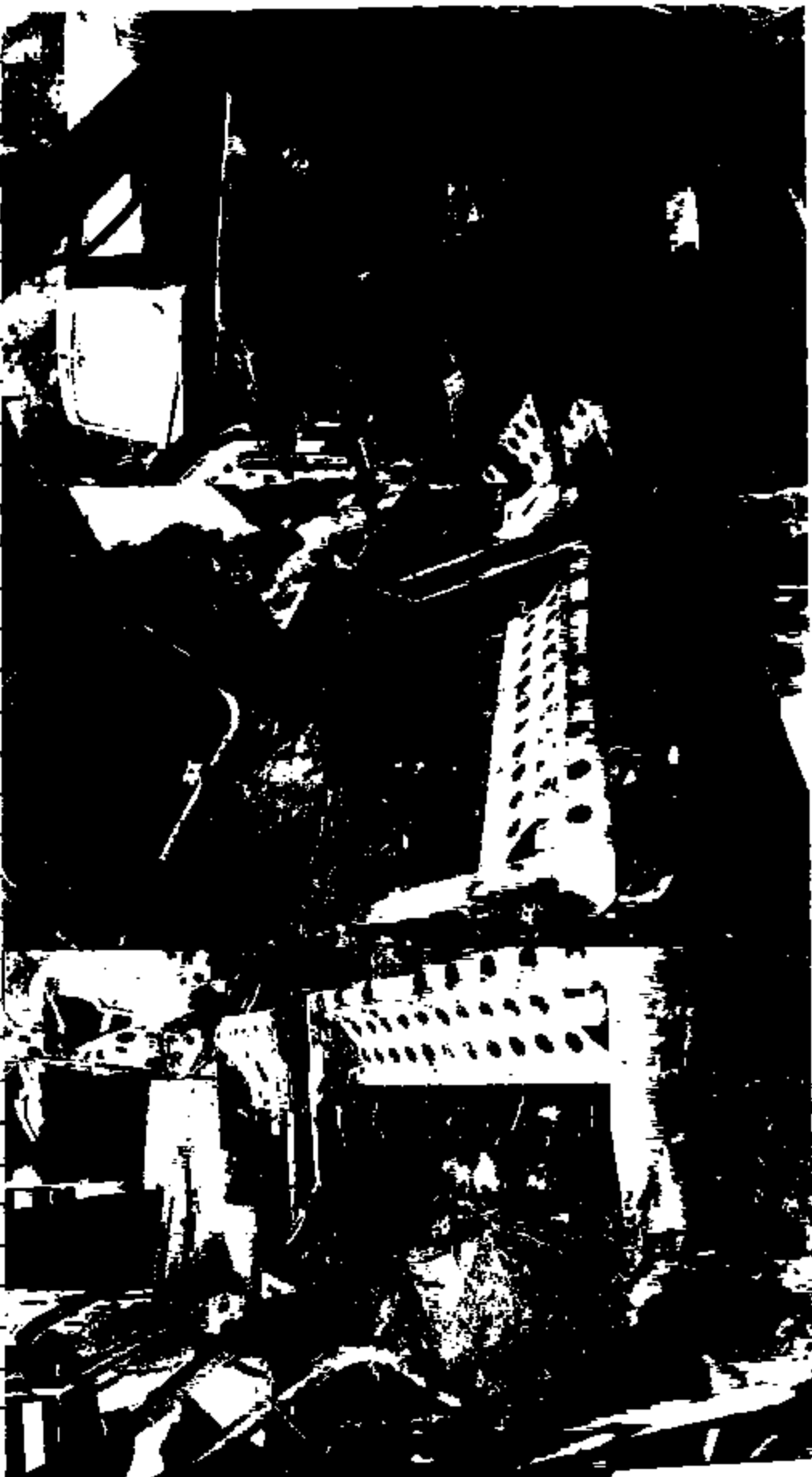


PHOTO SHEET

Co. Claim No.: 703949

Insured: Farm Bureau Insurance

Owner: [REDACTED]

Our File No.: 2004-019

Taken By: Britt Bolan

Date: 08-04-2004

# 28

Interior, right front cab floor view indicates no evidence of low-level burning in this area @ time of fire.

# 29

Interior, right, front cab dash view appears in good condition @ evidence of papers remaining in foot in glove compartment & high-level melting of dash components in the area. V pattern observed on bulkhead leads to driver's side of front cab area.

# 30

Evidence of glovebox remains.



PHOTO SHEET

Co. Claim No.: 703949

Insured: Farm Bureau Insurance

Owner:

Our File No.: 2004-019

Taken By: Britt Bolen

Date: 08-04-2004

\*31

Interior, front cab roof view indicates driver's side burn patterns more severe as a result of the fire.

\*32

Interior, left, front cab driver's door indicates burn patterns leading to dash area of vehicle. No evidence of low-level burn patterns observed in this area of the vehicle at time of inspection.

\*33

Interior view of front left, driver's side door indicates manufacturer label VIN # identified for vehicle.



PHOTO SHEET

Co. Claim No.: 703949  
Insured: Farm Bureau Insur  
Owner:   
Our File No.: 2004-019  
Taken By: Britt Bolen  
Date: 08-04-2004

# 34

Interior view of front, left,  
driver's side door indicates  
manufacturer label VIN#  
identified for vehicle.

# 35

Interior, left, front  
driver's side cab area  
overview indicates heaviest  
damage to dash & steering  
column area re. time of  
fire.

# 36

Interior, driver's seat  
indicates high-level damage  
to front of seat as a  
result of the fire.



PHOTO SHEET

Co. Claim No.: 703949  
Insured: Farm Bureau Insurance  
Owner: [REDACTED]  
Our File No.: 2004-019  
Taken By: Britt Boien  
Date: 08-04-2004

# 37

Interior, driver's side  
view of floor indicates  
evidence of high-lead  
melting in the area as an  
extension of fire damage

Interior, driver's side  
view of dash indicates  
Visible V pattern to  
bulkhead leading to  
brake & throttle control  
pedals as point of entry  
from interior engine  
compartment to interior  
cab of vehicle & time  
of fire.

# 39

Interior, front, right  
quarter view of interior  
engine compartment.





PHOTO SHEET

Co. Claim No.: 703949  
Insured: Farm Bureau Insura  
Owner:  
Our File No.: 2004-019  
Taken By: Britt Holen  
Date: 08-04-2004

#40  
Interior, rear, right  
quarter view of interior  
engine compartment.

#41  
Interior, center, front  
view of engine  
compartment.

#42  
Interior, center, rear  
view of engine  
compartment.



PHOTO SHEET

Co. Claim No.: 703949

Insured: Farm Bureau Insura

Owner:

Our File No.: 2004-019

Taken By: Britt Bolen

Date: 08-04-2004

#43

Engine oil level appears  
in good service @ time  
of fire.

#44

Interior, left, front  
quarter view of  
engine compartment.

#45

Interior, left, rear  
view of engine  
compartment.



PHOTO SHEET

Co. Claim No.: 703949

Insured: Farm Bureau Insurance

Owner: [REDACTED]

Our File No.: 2004-019

Taken By: Britt Bolen

Date: 08-04-2004

#46

Fire patterns @ base of front windshield indicate center area of rear engine compartment as most severely damaged.

#47

Interior, right, rear bulkhead view of engine compartment.

#48

Interior, center, rear view of bulkhead area of engine compartment.



PHOTO SHEET

Co. Claim No.: 703949  
Insured: Farm Bureau Insura  
Owner:  
Our File No.: 2004-019  
Taken By: Britt Bolen  
Date: 08-04-2004

# 49

Interior, left, rear  
bulkhead view of  
engine compartment.

# 50

Bulkhead area patterns  
lead to left/central,  
rear engine block as  
area of origin.

# 51

Interior, right side,  
top view of engine  
block remains.



PHOTO SHEET

Co. Claim No.: 703949  
Insured: Farm Bureau Insurance  
Owner: XXXXXXXXXX  
Our File No.: 2004-019  
Taken By: Britt Bolen  
Date: 08-04-2004

#52

Interior, center, top  
view of engine block  
remains.

#53

Interior, left side,  
top view of engine  
block remains.

#54

Interior, right side  
view of front tire  
fenderwell & engine  
block area.



PHOTO SHEET

Co. Claim No.: 703949  
Insured: Farm Bureau Insura  
Owner:   
Our File No.: 2004-019  
Taken By: Britt Bolen  
Date: 08-04-2004

#55

Interior, left side view  
of front tire, fenderwell,  
& engine block area.

#56

Top view of left side,  
front vehicle frame  
indicates heavy damage  
leading to fuel line  
in the area.

#57

Vehicle fuel line traced  
into left, rear, engine  
block area near  
bulkhead.



PHOTO SHEET

Co. Claim No.: 703949  
Insured: Farm Bureau Insura  
Owner:   
Our File No.: 2004-019  
Taken By: Britt Bolen  
Date: 08-04-2004

#58

Vehicle fuel line appears  
in good condition & lower  
vehicle frame under driver's  
side cab area.

#59

Right, rear engine  
block & bulkhead  
view of engine  
compartment.

#60

Center, rear engine  
block & bulkhead  
view of engine  
compartment.



PHOTO SHEET

Co. Claim No.: 703949

Insured: Farm Bureau Insurance

Owner: [REDACTED]

Our File No.: 2004-019

Taken By: Britt Bolen

Date: 08-04-2004

\*61

Left, rear engine block & bulkhead view of engine compartment.



\*62

Close-up view of braided fuel line running & adjacent bulkhead burn patterns near left central, rear engine compartment.



\*63

Close-up view of fuel line connectors to fuel injection tubing @ left central rear of engine block & bulkhead assembly.





PHOTO SHEET

Co. Claim No.: 703949

Insured: Farm Bureau Insurance

Owner: [REDACTED]

Our File No.: 2004-019

Taken By: Britt Rolan

Date: 08-04-2004

#64

Throttle body components recovered during debris removal appear in good condition & time of fire.

#65

Tubing recovered from left central rear engine compartment.

#66

Rear bulkhead insulation indicates burn patterns leading to fuel line connections & injector tubing near rear of left central engine block.



PHOTO SHEET

Co. Claim No.: 703949  
Insured: Farm Bureau Insura  
Owner:   
Our File No.: 2004-019  
Taken By: Britt Hoken  
Date: 08-04-2004

#67

Fuel injection tubing indicates  
rich fuel source & fuel line  
connection & remains of brake  
fuel line observed in fact.

#68

Fuel injection tubing  
identified as possible  
fuel source near point  
of origin.

#69

Bottom view of fuel  
line connectors into fuel  
injection tubing recovered  
from area of origin.

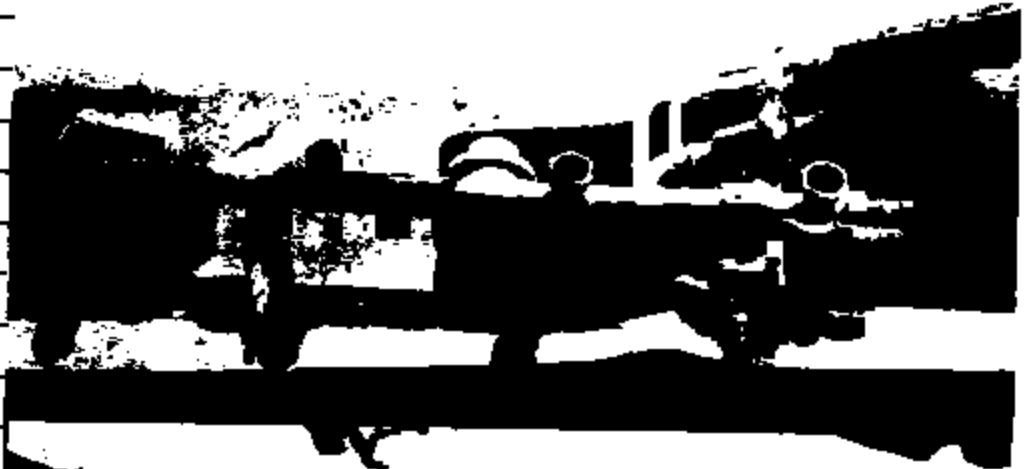


PHOTO SHEET

Co. Claim No.: 703949  
Insured: Farm Bureau Insurn  
Owner:   
Our File No.: 2004-019  
Taken By: Britt Bolen  
Date: 08-04-2004

#70  
Point of origin identified  
near fuel line connections @  
fuel injector tubing from  
this area of engine  
compartment.

#71  
Rear bulkhead insulation  
indicates V pattern toward  
fuel line / fuel injection  
area @ evidence of  
directional melting toward  
interior engine compartment.

#72  
No evidence of electrical  
problems observed in the  
area of origin. Splatter  
patterns to bulkhead area  
indicates raw fuel spillage  
onto surface area during  
fire.



PHOTO SHEET

Co. Claim No.: 703949  
Insured: Farm Bureau Insura  
Owner:  
Our File No.: 2004-019  
Taken By: Britt Bolan  
Date: 08-04-2004

#73

Interior, rear cab  
floor view indicates good  
carpet & floor mats in the  
area @ time of fire.

#74

Roll of toilet paper  
identified under right,  
rear cab seat indicates  
no evidence of low-  
level burning in the  
area @ time of fire.

#75

Interior, right, front  
passenger floor after  
debris removal. Reveals  
good carpet & floor mats  
in the area @ no evidence  
of low level burning from  
interior cab @ time of  
fire.



PHOTO SHEET

Co. Claim No.: 703949  
Insured: Farm Bureau Insura  
Owner:   
Our File No.: 2004-019  
Taken By: Britt Bolen  
Date: 08-04-2004



#176  
Interior cab bulkhead  
lead to driver's side  
bulkhead area @ time  
of fire.



#177  
Fire appears to have  
entered passenger cab  
from steering column,  
brake, & throttle control  
pedals from rear engine  
compartment bulkhead  
& time of fire.



#178  
Interior view of front  
driver's side floor area  
reveals entry point for  
fire from engine  
compartment area @  
time of fire.

PHOTO SHEET

Co. Claim No.: 703949

Insured: Farm Bureau Insurance

Owner:

Our File No.: 2004-019

Taken By: Britt Bolon

Date: 08-04-2004

#49  
Close-up view of interior  
cab breaching point from  
bulkhead area / engine  
compartment fire.



# State Farm Insurance Companies



April 23, 1996

Mid-South Office  
22 State Farm Drive  
Monroe, Louisiana 71205-0001

Parklane Tower West Suite 300  
Ford Motor Company  
3 Parklane Blvd  
Dearborn, MI 48126

RE: Our Claim Number: [REDACTED] ✓  
Our Insured: [REDACTED]  
Date of Loss: 01-26-96  
Total Amount of Loss: \$23,410.00  
Our Payment: \$23,160.00  
Insured's Payment: \$250.00

Your File Number:  
Your Insured: Ford Motor Company  
3 Parklane Blvd Suite 300  
Dearborn, MI 48126



Dear Subrogation Department:

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

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

We are enclosing our proof of loss for our subrogation claim. We ask that you either forward your payment or communicate with us in regard to your position in this matter.

Please provide a timely response in compliance with the Unfair Claims Practices Act of this state.

Sincerely,

*Murry Brosch*  
Murry Brosch  
Claim Representative  
State Farm Mutual Automobile Insurance Company  
(318) 362-6013

1675

# FIRE INCIDENT REPORTING SYSTEM

FIRE DEPT. WILMINGTON (out of city)  DELAY

A	19	INCIDENT NO.	11000118	EXP. NO.	0116	YEAR	96	DAY OF WEEK	1 <input type="checkbox"/> SUNDAY 2 <input type="checkbox"/> MONDAY 3 <input type="checkbox"/> TUESDAY 4 <input type="checkbox"/> WEDNESDAY	5 <input type="checkbox"/> THURSDAY 6 <input type="checkbox"/> FRIDAY 7 <input type="checkbox"/> SATURDAY	ALARM TIME	11/14/96	ARRIVAL TIME	11/15/96	TIME IN TIME	13:05
	B	TYPE OF SITUATION FORMED		VEHICLE FIRE		V/B		TYPE OF ACTION TAKEN		EXTINGUISHMENT		MUTUAL AID		9 <input type="checkbox"/> ROAD 10 <input type="checkbox"/> OTHER		
C	FIRE PROPERTY USE (Completed)		HIGHWAY		R/W		IGNITION FACTOR		UNDETERMINED				100			
D	PROPERTY NO. (at 21 changed)		LA 500 PACTON				PROPERTY NO.									
E	OCCUPANT NAME (EN, FN, MI)		SAME								O.O.B. (M/D/Y)					
F							ADDRESS IN (at 21 changed)		GEORGE TANN							
G	METHOD OF ALARM		4 <input type="checkbox"/> Smoke 5 <input type="checkbox"/> Alarm 6 <input type="checkbox"/> Fire alarm pull 7 <input type="checkbox"/> Fire alarm system		8 <input type="checkbox"/> Other 9 <input type="checkbox"/> Unknown 0 <input type="checkbox"/> Undetermined or not reported		CO. INSPECTOR		DISTRICT		DIST.		NO. ALARM			
H	NO. FIRE SERVICES PERSONNEL RESPONDED		K95		NO. ENGINE RESPONDED		K0V		NO. ALARM APPARATUS RESPONDED		K06		NO. OTHER VEHICLES RESPONDED		K0V	

COMPLETE LINES A - H ON ALL INCIDENTS RELATED

20	NUMBER OF VEHICLES FIRE SERVICE	K00	OTHER	K00	NUMBER OF PASSENGERS FIRE SERVICE	K00	OTHER	K00
----	---------------------------------	-----	-------	-----	-----------------------------------	-----	-------	-----

J	COMPLEX - GENERAL PROPERTY USE		ROAD		R/W		MOBILE PROPERTY TYPE (Complete Line 19)		AUTO MOBILE		IN			
K	AREA OF FIRE ORIGIN		ENGINE & TRAN AREA		V/B		EQUIPMENT INVOLVED IN SITUATION (Complete Line 19)		UNDETERMINED		V/B			
L	FORM OF HEAT SITUATION		UNDETERMINED		V/B		TYPE OF MATERIAL BURNED		UNDETERMINED		V/B			
M	METHODS OF EXTINGUISHMENT		1 <input type="checkbox"/> Soil application 2 <input type="checkbox"/> Portable extinguisher 3 <input type="checkbox"/> Automatic ext. system		4 <input type="checkbox"/> Water spray 5 <input type="checkbox"/> Foam 6 <input type="checkbox"/> Dry chemical		7 <input type="checkbox"/> Pre-cooled liquid/dry 8 <input type="checkbox"/> Pre-cooled liquid/dry/draft extinguisher 9 <input type="checkbox"/> Flood (incl. hose/retractor draft extinguisher)		10 <input type="checkbox"/> Other 11 <input type="checkbox"/> Undetermined or not reported		ESTIMATED TOTAL DOLLAR LOSS		D000213.000.00	

COMPLETE LINES I - M FOR ALL FIRES RELATED

N	NUMBER OF STORIES		1 <input type="checkbox"/> 1 story 2 <input type="checkbox"/> 2 story 3 <input type="checkbox"/> 3 to 4 stories 4 <input type="checkbox"/> 5 to 6 stories 5 <input type="checkbox"/> 7 to 12 stories 6 <input type="checkbox"/> 13 to 24 stories 7 <input type="checkbox"/> 25 to 45 stories 8 <input type="checkbox"/> 46 stories or more		CONSTRUCTION TYPE		1 <input type="checkbox"/> Fire resistant 2 <input type="checkbox"/> Heavy timber 3 <input type="checkbox"/> Protected noncombustible 4 <input type="checkbox"/> Unprotected noncombustible 5 <input type="checkbox"/> Protected masonry 6 <input type="checkbox"/> Unprotected masonry 7 <input type="checkbox"/> Reinforced concrete 8 <input type="checkbox"/> Other		9 <input type="checkbox"/> Unprotected of heavy 10 <input type="checkbox"/> Protected wood frame 11 <input type="checkbox"/> Unprotected wood frame 12 <input type="checkbox"/> Other		13 <input type="checkbox"/> Undetermined or not reported	
O	INTENT OF DAMAGE		1 <input type="checkbox"/> Damaged to the extent of repair 2 <input type="checkbox"/> Damaged to the extent of replacement 3 <input type="checkbox"/> Damaged to the extent of total loss 4 <input type="checkbox"/> Damaged to the extent of total loss 5 <input type="checkbox"/> Damaged to the extent of total loss 6 <input type="checkbox"/> Damaged to the extent of total loss 7 <input type="checkbox"/> Damaged to the extent of total loss		DETECTION PERFORMANCE		1 <input type="checkbox"/> Not in reach of device of 1 1/2 hrs. after 2 <input type="checkbox"/> Not in reach of device of 1 1/2 hrs. after 3 <input type="checkbox"/> Not in reach of device of 1 1/2 hrs. after 4 <input type="checkbox"/> Not in reach of device of 1 1/2 hrs. after 5 <input type="checkbox"/> Not in reach of device of 1 1/2 hrs. after 6 <input type="checkbox"/> Not in reach of device of 1 1/2 hrs. after 7 <input type="checkbox"/> Not in reach of device of 1 1/2 hrs. after		SPRINKLER PERFORMANCE		1 <input type="checkbox"/> Equipment operated 2 <input type="checkbox"/> Equipment operated - damaged 3 <input type="checkbox"/> Equipment operated - damaged 4 <input type="checkbox"/> Equipment operated - damaged 5 <input type="checkbox"/> Equipment operated - damaged 6 <input type="checkbox"/> Equipment operated - damaged 7 <input type="checkbox"/> Equipment operated - damaged	
P	TYPE OF MATERIAL OPERATING HOIST BRACK		1 <input type="checkbox"/> Steel 2 <input type="checkbox"/> Aluminum 3 <input type="checkbox"/> Other		APPROX. OF STEEL TRAVEL		1 <input type="checkbox"/> Not specified above 2 <input type="checkbox"/> Not specified above 3 <input type="checkbox"/> Not specified above 4 <input type="checkbox"/> Not specified above 5 <input type="checkbox"/> Not specified above 6 <input type="checkbox"/> Not specified above 7 <input type="checkbox"/> Not specified above		8 <input type="checkbox"/> Other		9 <input type="checkbox"/> Other	

COMPLETE LINES N - R FOR STRUCTURE FIRES

30	IF MOBILE PROPERTY	YEAR	95	MAKE	FORD	MODEL	VEHICLE	SERIAL NO.	1FTX51N6S	
40	IF EQUIPMENT INVOLVED IN SITUATION	YEAR		MAKE		MODEL		SERIAL NO.		COMPLETE LINES 3 - 7 IF EQUIPMENT OR MOBILE PROPERTY

60	TOTAL AMOUNT RECEIVED	002130000.00	CONTAINS		NAME OF BURNANCE CO.	STATE FARM	AREA CODE	318	TELEPHONE NO.	628-2711
	TOTAL DEDUCTIBLE AMOUNT	002130000.00	CONTAINS		PROPERTY MANAGEMENT		1 <input type="checkbox"/> Fire 2 <input type="checkbox"/> Other	4 <input type="checkbox"/> City 5 <input type="checkbox"/> State 6 <input type="checkbox"/> Federal	8 <input type="checkbox"/> Other 9 <input type="checkbox"/> None	
	INVESTIGATOR REQUESTED	<input type="checkbox"/> YES <input type="checkbox"/> NO	REQUEST MADE TO (Agency's Name, Address, City, State, Zip Code)							

COMPLETE LINES S - Y IF FIRE

REPORT BY (Name/Title/Signature)	DATE	REPORT BY (Name/Title/Signature)	DATE
John J. ... Fire Fighter	2-27-96		

ALL INCI-DENTS



FILED

22 AUG 22 P 4: 15

GRANT PARISH  
BY \_\_\_\_\_

CIVIL SUIT NO. **11448**

[REDACTED]

35TH JUDICIAL DISTRICT COURT

VERSUS

PARISH OF GRANT

FORD MOTOR COMPANY

STATE OF LOUISIANA

**PETITION FOR DAMAGES**

The petition of STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY, a foreign corporation authorized to do and doing business in the State of Louisiana, and [REDACTED] a domiciliary and resident of Pollock, Grant Parish, Louisiana, with respect represents:

1.

That defendant herein is FORD MOTOR COMPANY, a foreign corporation authorized to do and doing business in the State of Louisiana, who may be served through its registered agent for service of process, C.T. Corporation Systems, 8338 United Plaza Boulevard, Baton Rouge, Louisiana 70809.

2.

Defendant is liable unto petitioner, for such sums as are reasonable in the premises, together with legal interest thereon from date of judicial demand until paid in full and all costs of these proceedings for the following reasons:

3.

On or about January 27, 1996 [REDACTED] owned and was operating a 1993 Ford F150 XLT Super Cab Flare-side truck, manufactured by the defendant, on U.S. Highway 167 South at or near its intersection with La. Highway 980 near the City of Packton, Winn Parish, Louisiana, when the vehicle caught fire, resulting in the total loss of the vehicle.

4.

The cause of the above mentioned fire was latent and/or hidden manufacturing defects which existed at the time of purchase by [REDACTED]

5.

Ford Motor Company is liable unto petitioners for all damages set forth herein as the vehicle was unreasonably dangerous in construction and composition in that due to design defects the combustible supply fuel line to the fuel injection system failed resulting in flammable liquid fuel burn.

6.

As a direct result of the above described fire the [REDACTED] vehicle was rendered a total loss.

7.

At all times pertinent herein, State Farm Mutual Automobile Insurance Company issued a policy of insurance to [REDACTED] covering the vehicle driven by him and, as a result of such contractual commitment, State Farm Mutual Automobile Insurance Company paid to or on behalf of [REDACTED] certain sums under the comprehensive collision and rental reimbursement provisions of said insurance policy, said amount being the fair market value of the [REDACTED] vehicle less the deductible loss. State Farm Mutual Automobile Insurance Company is therefore legally and conventionally subrogated to the rights of its insured for the amount so paid.

8.

[REDACTED] makes demand for the amount of his deductible loss expended in connection with this incident.

9.

Petitioners show that they are entitled to compensation for all pecuniary and nonpecuniary losses suffered, an award for attorney fees and an adjudication that defendant is liable for payment of costs, expert witness fees and all other expenses.

10.

Petitioners show that the total damages sought are below \$50,000.

WHEREFORE, PETITIONERS PRAY:

1. Defendant be duly served with a copy of and be duly cited to appear and answer this petition; and
2. After due proceedings are had and a trial hereof there be judgment rendered herein in favor of STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY and [REDACTED] and against the defendant, FORD MOTOR COMPANY, for such sums as are reasonable in the premises, together with legal interest on all sums from date of [REDACTED] demand [REDACTED] paid in full, and all costs of these proceedings.

Respectfully submitted:

GST, METHVIN & HUGHES  
(A PROFESSIONAL LAW CORPORATION)

BY: 

PAUL M. LAFLUR  
Bar Roll Number: 23899  
Post Office Box 1871  
803 Johnston Street  
Alexandria, Louisiana 71309-1871  
Telephone: (512) 448-1632  
ATTORNEYS FOR PLAINTIFFS

**SERVICE INFORMATION:**

PLEASE SERVE DEFENDANT, FORD MOTOR COMPANY, THROUGH ITS AGENT FOR SERVICE OF PROCESS, C.T. CORPORATION SYSTEMS, 8350 UNITED PLAZA BOULEVARD, BATON ROUGE, LOUISIANA 70889