



1811 CHESTNUT STREET
PHILADELPHIA, PA 19103
(215) 564-4837

604 PENN STREET
READING, PA 19601
(610) 375-4131

605 MARKETPLACE PLAZA
JERSEY CITY, NJ 07310
(201) 815-0020

RECEIVED
JAN 23 2002
OFFICE OF THE
GENERAL COUNSEL

Law Office
WEBER GOLDSTEIN GREENBERG & GALLAGHER, LLP
TWO GATEWAY CENTER
SUITE 1480
608 STARBUCK STREET
PITTSBURGH, PENNSYLVANIA 15222

(412) 281-4841
FAX (412) 281-4547

January 17, 2002

321 SPRUCE STREET
SCRANTON, PA 18503
(717) 341-3388

1101 N. BRIDGE HIGHWAY
CHERRY HILL, NJ 08004
(609) 667-8111

E-MAIL: cgd@wggg-llp.com

Ford Motor Company
3 Park Lane Boulevard
Suite 300
Dearborn, MI 48126-2568

Re: [REDACTED]
1997 Ford Expedition

Dear Sir/Madam:

Please be advised that I have been retained to pursue an action against you in respect to damage to the automobile owned by [REDACTED] on July 25, 2001. This damage occurred when [REDACTED] vehicle caught fire.

Previous notification has been sent to you regarding reimbursement for these matters. This letter is to advise you that unless we are able to work toward a resolution of this matter within thirty days, I will be filing a Complaint against you. I would ask that you contact either myself or my paralegal, Kim Young, to resolve this matter.

We look forward to hearing from you or your representative.

Very truly yours

WEBER GOLDSTEIN GREENBERG &
GALLAGHER, LLP

RECEIVED
JAN 23 2002
OFFICE OF THE
GENERAL COUNSEL

By: Christopher P. Deegan
Christopher P. Deegan

cc: Derek Basile - 38-J744-534



ERG5-085-LC-6249



EN03-005-LC-6258



ER05-005-LC-8251



EM05-083-LC-0252



E985-985-LC-8253



PHOTOGRAPH NUMBER 16



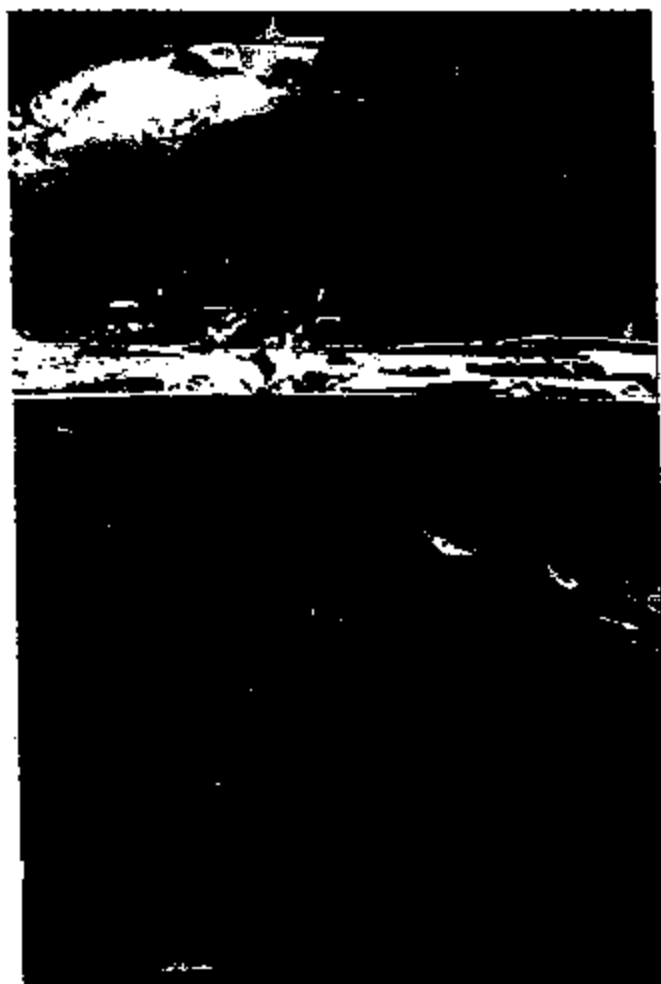
PHOTOGRAPH NUMBER 17



PHOTOGRAPH NUMBER 18

Photographs 16 through 18 are separate and distinct views of the engine compartment prior to any debris removal.

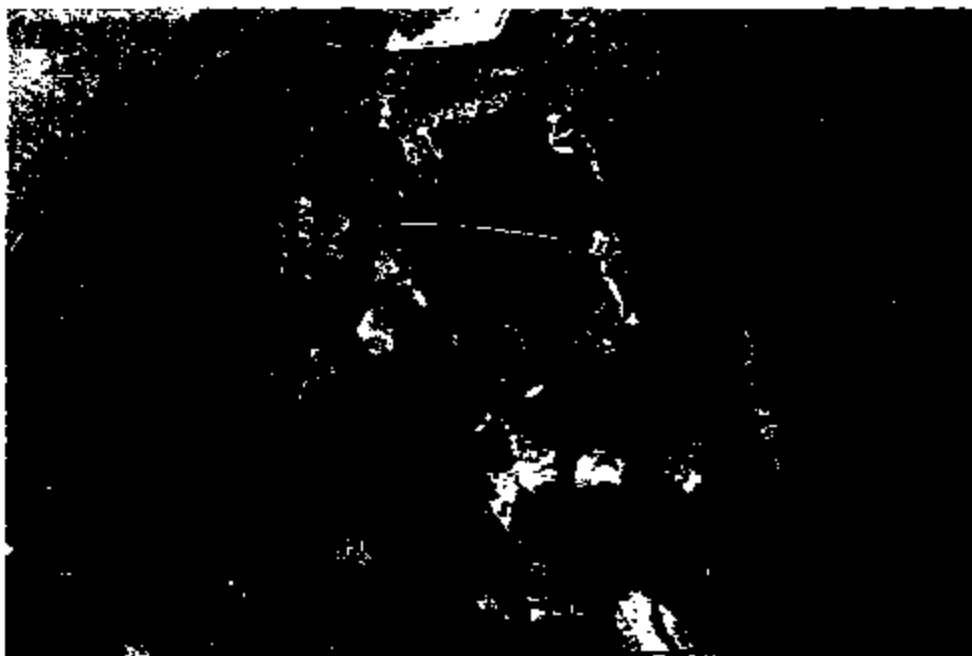
The wires located in and around the area of origin were not brittle, however, the insulation on the wires was burned from flame impingement.



PHOTOGRAPH NUMBER 19



PHOTOGRAPH NUMBER 20



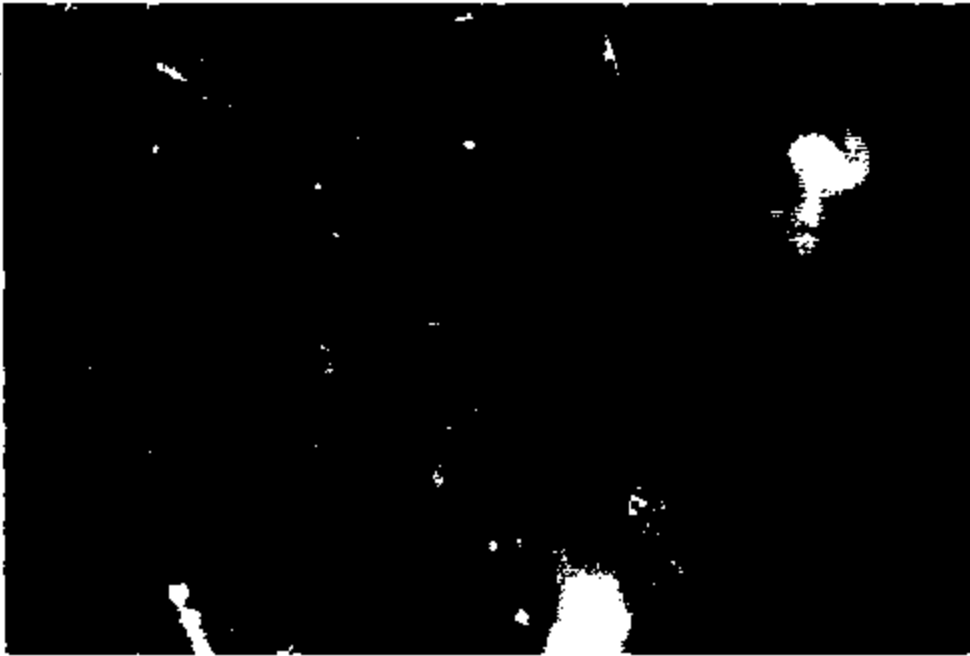
PHOTOGRAPH NUMBER 21

Photographs 19 through 21 reveal the engine compartment after removal of debris.

The damage assessment indicates the area of origin is located around the throttle body.



PHOTOGRAPH NUMBER 22



PHOTOGRAPH NUMBER 23

Photographs 22 and 23 reveal the point of origin of this fire loss.

The red arrow indicates the location of the absent "O" ring, identified as the #3 fuel injector. The "O" ring seals the fuel rail and fuel injector, however, is missing in this incident.

CASUALTY CONSULTANTS inc.

P.O. Box 1237
Lebanon, Pennsylvania 17042
(717) 273-8666
Fax (717) 273-8715

JOHN R. BARRIDGE, JR.
President

August 6, 2001

STATE FARM INSURANCE COMPANY
PO Box 499
Newtown Square, PA 19073-0499

Attn: Greg Lukens/Claims

RE: Vehicle Fire

Insured: [REDACTED]
Date & Time of Loss: July 25, 2001 (Wednesday)
Approximately 2130 hours

Claim # [REDACTED]

CCI File #080301159

Dear Mr. Lukens:

DISCLAIMER

THE FOLLOWING INFORMATION CONTAINED IN THIS WRITTEN REPORT CONTAINS THE MENTAL IMPRESSIONS, OPINIONS, AND CONCLUSIONS OF THIS INVESTIGATOR, REGARDING THE INVESTIGATION INTO THE RECENT VEHICLE FIRE CLAIM INVOLVING THIS 1997 FORD EXPEDITION XLT OWNED BY DAVID & RICHELLE CUCCHI.

THIS INFORMATION WILL REMAIN AS CONFIDENTIAL AND PRIVILEGED INFORMATION FOR STATE FARM INSURANCE COMPANY AND THEIR LEGAL COUNSEL AND MAY ONLY BE RELEASED BY THE ADDRESSEE.

As agreed upon by you, this correspondence will serve to document this cause and origin investigation under Casualty Consultants, Inc. "FAST TRACK PROGRAM". If at any time in the future you have the need for full and

CONFIDENTIAL
ORIGINAL

complete documentation of this file, Casualty Consultants, Inc. has retained all pertinent information for your convenience.

On Monday, August 6, 2001, this investigator traveled to Horisk's Salvage Yard, 417 Airport Road, New Castle, DE, and examined the risk vehicle.

During the course of this investigation, Casualty Consultants, Inc. conducted a computerized vehicle identification number inquiry and discovered the following information:

VEHICLE HISTORY REPORT

VEHICLE SPECIFICATIONS:

Vehicle ID: 1FMFU1SL3VL [REDACTED]
Yr/Mfg: 1994 Ford
Model: Expedition
Body: 4D Sp Ut Utility
Engine: 5.4L V8 PFI SOHC 16V
Fuel: Gasoline
Driveline: 4-wheel Drive
Aspiration: Normal
Country Mfg: United States

TITLE HISTORY:

Salvage/Junk Title	Checked/No Problem Title Found
Rebuilt/Reconstructed Title	Checked/No Problem Title Found
Flood Damage Title	Checked/No Problem Title Found
Damage Disclosure Title	Checked/No Problem Title Found
Manufacturer Buyback (LEMON) Title	Checked/No Problem Title Found
Exceeds Mechanical Limits Title	Checked/No Problem Title Found
Not Actual Mileage Title	Checked/No Problem Title Found

ODOMETER ROLLBACK CHECK:

The VIN submitted for this 1997 Ford Expedition was checked to determine if any reported odometer reading is less than a previous reading.

No odometer rollback detected.

VEHICLE HISTORY DETAILS:

Date Reported	Odometer Reading	Information Source	General Comments
10/01/1996		New York Motor Vehicle Dept. Jamestown, NY	Registered as private vehicle
11/22/1996	12	New York Motor Vehicle Dept. Cleveland, OH	Title issued
12/14/1999	36,003	Auto Inventory Buffalo, NY	Offered for sale at dealership
02/16/2000		New York Motor Vehicle Dept. Newfane, NY	Title issued
07/11/2000	43,001	Pennsylvania Motor Vehicle Dept. Manheim, PA Title #54909509 01 AD	Title or registration issued
07/14/2000	43,058	Auto Auction	Sold at auction in Eastern Region Listed as a dealer sale
09/20/2000		Pennsylvania Motor Vehicle Dept. Parkesburg, PA Title #54909509 02 CU	Title or registration issued

Additionally, a computerized search was conducted on all recalls and service bulletins for this year/make vehicle.

At the conclusion of this investigation, after eliminating all other accidental and incendiary causes, it is my professional opinion, asserted with a reasonable degree of certainty, relying on this investigator's training and experience, the cause of this loss was a fuel leak located around the fuel rail and fuel injector on the passenger/right side of the engine compartment due to the absence of the top #3 cylinder injector "O" ring, which seals the fuel rail and fuel injector.

The fuel leak ignited component parts throughout the engine compartment, leaving a "V" pattern that emanated into the passenger compartment through

the upper portion of the firewall and lower section of the windshield area near the center, causing fire damage to the interior of the vehicle.

The possibility exists that during the testing of the fuel and ignition system on 6/28/01, by Chris Watt Service Center, the fuel rail on the right side may have been removed and replaced, along with the left side.

This area may also be effected by a reoccurring problem in this make/type vehicle involving "O" rings at the fuel rails becoming dislodged or damaged, causing a fire scenario.

Photographs were taken of the subject vehicle during the examination, and will be made a permanent part of this report for your future reference and review.

Casualty Consultants, Inc., reserves the absolute right to re-evaluate part or all of this opinioned report, should any new evidence be uncovered which may either prove, disprove, or have any relationship to any theories/opinions developed during this investigation, or any subsequent investigation.

Please do not hesitate to contact me in the event you may have any questions or comments regarding these findings and/or this report.

Respectfully submitted,

Casualty Consultants, Inc.

Mark K. Gibble, Jr.
Mark K. Gibble, Jr.
Vice-Pres. of Vehicle Examinations

MKG/kt

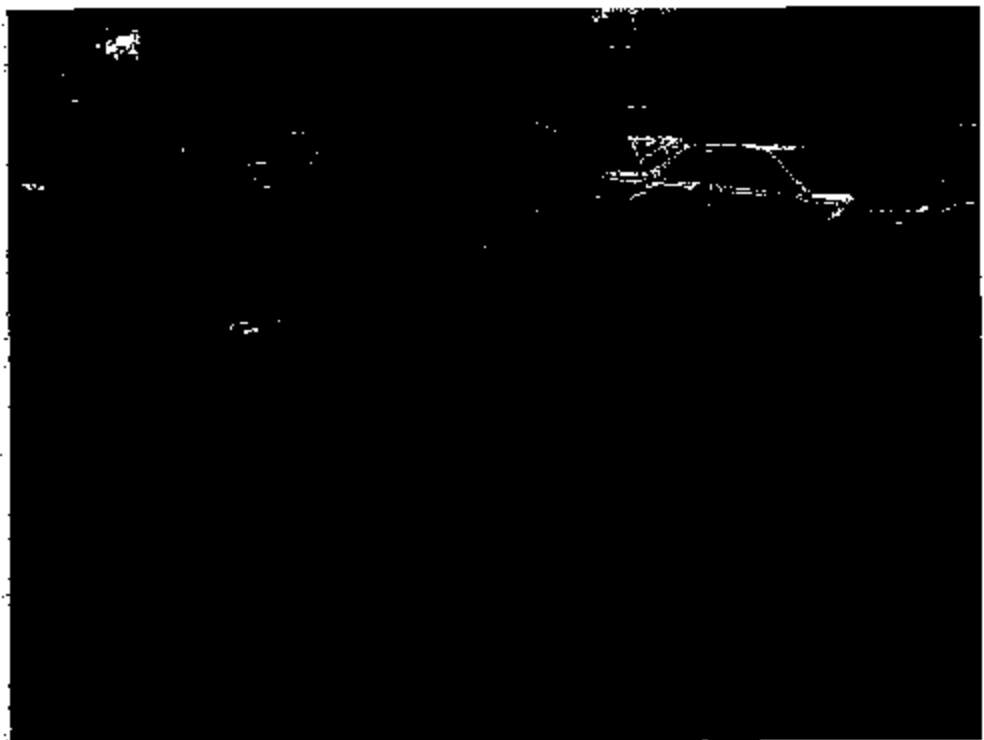
Reviewed for content and clarity by 
John R. Bainbridge, Jr., CFI, CPE, BEFE
President



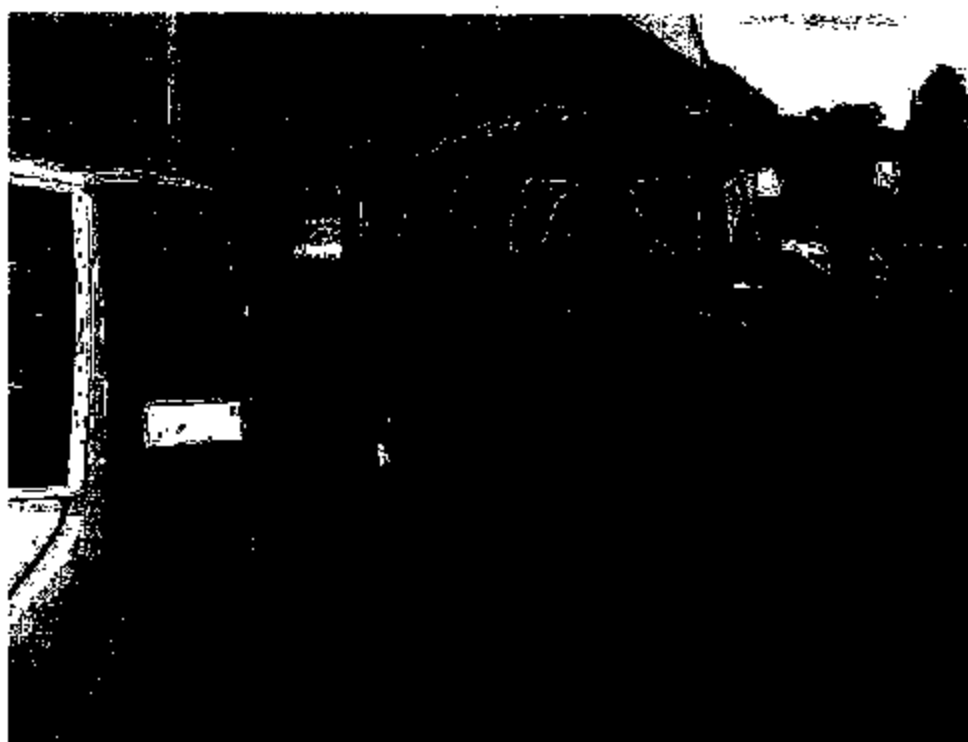
ERG5-885-LC-8288



ERG-003-LC-6287







WEST SAWSBURY TOWNSHIP POLICE DEPARTMENT

◆◆◆
4051 WEST LINCOLN HIGHWAY ◆ PARKESBURG, PENNSYLVANIA 15365
Phone 814-837-5000 ◆ Fax 814-837-5011
e-mail address: wsawburypd@ccia.net

West Sadsbury Township
Chester County

John F. Slauch
Chief of Police
jfslauch@ccia.net

September 12, 2001

SEP 17 2001

State Farm Insurance Companies
Newtown Square Service Center
P.O. Box 499
Newtown Square, PA 19073-9806

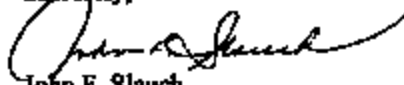
RE: Claim No. [REDACTED]
Auto Fire

To Whom It May Concern:

Regarding the aforementioned Claim and attached report request, this Department responded to a dispatch of an auto fire on Wednesday, July 25 (2001) at 2129 hours. Location of event was on Route 41 (Gap-Newport Pike), south of Graber Supply Company in West Sadsbury Township. Responding officer found fully involved auto fire. Vehicle, a Ford Expedition, was owned by a David CUCCHI. Vehicle was towed by Null's Towing, Cochranville, PA. Information relating to this event is recorded on the responding officers Patrol Log.

Should you have any questions or require additional information, please feel free to contact me.

Sincerely,


John F. Slauch
Chief of Police

ER05-005-LC-0271

ATGLEN FIRE CO. NO. #1
Incident Report
01-097

Shift:03	Date:08/25/01	Day:WED	Temp:80	Weather:CLEAR	Dist:26	Box:2603
Disp:2128	Resp:2131	Arrive:2135	UC:2143	Fd Avail:2255	FP Avail:	Hrs:0127
Location:RT.41 S/O FARM LANE Twp:WEST SADBURY Cty:CHESTER						
Nature:CAR		Info:CAR FIRE				
Found:FORD EXPEDITION WELL INVOLVED						
Received By:911		Final Type:SMV				
Action:EXTINGUISHMENT						
Alarms: 1 Personnel: 7 Mutual Aid:Y Personnel: 6 Miles:5						
Assist Stations: 28 28A LC 52A						
Engines: 2 Aerials: 0 Rescues: 0 Tankers: 0 Brush: 0 Squads: 0						
BLS: 2 ALS: 0 Helicopter: 0 Hazmat: 0 Misc: 1 Total: 5						
Misc Description: TRAFFIC 28						
Comments: DUE TO ALL INSURANCE CARDS WERE INSIDE VEHICLE UNABLE TO OBTAIN INFORMATION ESTIMATED VEHICLE TOTAL LOSS DUE TO AMOUNT OF INVOLVEMENT UPON ARRIVAL.						
OIC:WILLIAM R.L.WINTERS,JR.			Filed By:WILLIAM R.L. WINTERS,SR			
* EQUIPMENT *						
3/4:	0 ft. 1:	0 ft. 1 1/2:	0 ft. 1-3/4:	400 ft.		
2 1/2:	0 ft. 3:	0 ft. 4:	0 ft. 5:	0 ft.		
LADDERS:	WATER:	750 gal.	FOAM:	0 gal.		
	0 ft.	AIRPARKS:	3	CASCADE: N	COMPRESSOR: N	
* TOOLS USED *						
TOOLS: HALLIGAN BAR,CLOSET HOOK						
* UNITS *						
ENG 26-3	Driver:021	Officer:067				
	Left Jump:	Right Jump:082				
	Firefighters:043					
	Man Hours =	05:48				
Direct	008	059				
	Man Hours =	02:54				
ON STATION	Driver:085	Officer:				
	Man Hours =	01:27				
	Total Man Hours =	10:09				

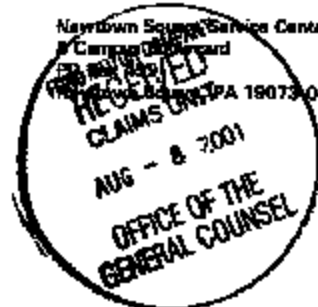
State Farm Insurance Companies



Newtown Square Service Center
1000 Newtown Square
Philadelphia, PA 19073-0408

August 6, 2001

FORD MOTOR CO
PARKLANE TOWERS WEST STE 400
THREE PARKLANE BLVD
DEERBORN MI 48128-2668



RE: Our Claim #: [REDACTED]
Our Insured: [REDACTED]
Date of Loss: July 25, 2001
1997 Ford Expedition XLT Four-Wheel Drive
VIN: 1FMFU18L3V [REDACTED]

Dear Sir or Madam:

The identified vehicle is insured by State Farm Mutual Automobile Insurance Company. This vehicle experienced a fire that may have been caused by an "O" ring(s) not being properly sealed.

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

Please contact me at (810) 325-8970 to set up a time for inspection.

Sincerely,

Greg Lukens
Claim Specialist
State Farm Mutual Automobile Ins. Co.
(810) 325-8970

- 7/25/01
- 97 EXPED
- VIN

GL/ns/011/0806028



IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
MUNICIPAL DEPARTMENT, FIRST DISTRICT

[REDACTED]

Plaintiff,

vs.

Ford Motor Company, a corporation; &
Spring Hill Ford, Inc., a corporation,

Defendants.

NO. 99 M1 10342

Amount Claimed: \$23,388.59

FIRST AMENDED COMPLAINT AT LAW

COUNT 1 - PRODUCTS LIABILITY

NOW COMES the [REDACTED] by Safeco Insurance Companies as Subrogee, by and through their attorneys, Edward L. Schaller & Associates, complaining of Defendants Ford Motor Company and Spring Hill Ford, alleges as follows:

1. Defendant, Ford Motor Company, is a Foreign Corporation licensed to do business in Illinois. Defendant is engaged in the design, manufacture, and sale of various types of motor vehicles.
2. Defendant, Spring Hill Ford, Inc., is a domestic corporation maintaining its principal office and place of business at 800 Dundee Avenue, in the City of East Dundee, Kane County, Illinois. Defendant is engaged in the business of selling various types of motor vehicles to the general public.
3. Prior to July 12, 1997, defendant Ford Motor Company, was engaged in the business of designing, manufacturing, and selling a particular type of automobile, more specifically described as follows: a 1997 F-150 extended cab pickup truck; and, prior to the stated above date, defendant Spring Hill Ford, was engaged in the business of selling automobiles of this type to the general public.
4. Prior to July 12, 1997, defendant Ford Motor Company, sold and distributed to other defendant, Spring Hill Ford, a particular 1997 F-150 extended cab pickup truck, and prior to July 12, 1997 sold and delivered the automobile to plaintiff.
5. The motor vehicle was sold to plaintiff without substantial change to any part or to the whole of it, from the time it was sold and distributed by defendant, Ford Motor Company, to, and including, the time of its sale and delivery by defendant Spring Hill Ford, to plaintiff, and no change was expected, contemplated, or planned by either defendant.

6. After plaintiff purchased the motor vehicle from defendant, Spring Hill Ford, he proceeded to drive and use it, and on July 12, 1997, at approximately 7:45 p.m., when the occurrence complained of took place, he was driving the motor vehicle upon 352nd Avenue at or near the city of Kenosha, Kenosha County, Wisconsin.

7. At some time during the manufacture or assembly of the above described motor vehicle by Ford Motor Company, the defendant damaged a fuel injector installed in the above described vehicle; or installed a defective fuel injector, and this condition continued unchanged while the automobile was in the possession and ownership of the defendant, Spring Hill Ford, Inc., and this condition continued unchanged and unaltered until, and including July 12, 1997, so that the automobile was in a defective condition unreasonably dangerous to any user of it.

8. On July 12, 1997, plaintiff's vehicle was severely damaged as a result of a fire occurring in the passenger side of the engine compartment caused by an atomized fuel leak from the front fuel injector. The atomized fuel leak from the front fuel injector was the direct and proximate cause of the fire and the ensuing damage to the vehicle.

9. As a result of the defendants negligence, the plaintiff suffered damages in the sum of \$23,398.59, this damage being the damage to the vehicle as a result of the ensuing fire.

WHEREFORE, Plaintiff [redacted] by Safeco Insurance Companies as Subrogee, requests judgment against defendants Ford Motor Company, and Spring Hill Ford, and each of them, in the sum of \$23,398.59 plus costs.

COUNT II - NEGLIGENCE REPAIR OR SERVICE

NOW COMES the Plaintiff [redacted] by Safeco Insurance Companies as Subrogee, by and through their attorneys, Edward L. Schuller & Associates, in the alternative complaining of the Defendant Spring Hill Ford, alleges as follows:

1-4. The Plaintiff realleges and reaffirms paragraphs one through four of Count I as Paragraphs one through four of Count II.

5. At all times mentioned in this complaint, the defendant, Spring Hill Ford, owned and operated a service department located at 800 Dundee Avenue in East Dundee, Kane County, State of Illinois.

6. At all times mentioned in this complaint, Plaintiff was the owner of a 1997 F-150 extended cab pickup truck, VIN number 1FTEX1769VK [redacted] license number 3622 NC.

7. Plaintiff's vehicle was equipped with a fuel injection system.

8. On March 11, 1997, the Plaintiff took his vehicle to the defendant, Spring Hill Ford, for the purpose of having a complete oil change service. The defendant agreed to do the work for no charge, as it was a standard dealer service check. A copy of the repair estimate is attached to this complaint, marked Exhibit 1 and incorporated by reference.

9. On March 11, 1997, the defendant, Spring Hill Ford, changed the oil in the Plaintiff's vehicle and checked other fluids in the vehicle and performed a general inspection of the vehicle pursuant to the service agreement. After performing these services the defendant returned the car to the Plaintiff and assured the Plaintiff that the work had been performed in a proper manner and that the Plaintiff would have no problems with his vehicle.

10. On July 12, 1997, at approximately 7:45 p.m., when the occurrence complained of took place, he was driving the motor vehicle upon 352nd Avenue at or near the city of Kenosha, Kenosha County, Wisconsin; when suddenly the Plaintiff's vehicle stalled at the said location. When Plaintiff exited his vehicle and checked under the hood the engine compartment was on fire.

11. R. Schwarz & Associates, Ltd., examined the Plaintiff's vehicle and determined that the fire was caused by an atomized fuel leak from the front fuel injector. A copy of the report is attached to the complaint, marked Exhibit 2 and incorporated by reference.

12. The defendant, Spring Hill Ford, in undertaking to perform specific services upon the Plaintiff's vehicle, owed to Plaintiff a duty to exercise due care in performing the work.

13. The defendant, Spring Hill Ford, in breach of the duty described above, negligently and carelessly damaged the front fuel injector in Plaintiff's vehicle while performing the agreed upon services.

14. As a direct and proximate result of the negligence and carelessness of the defendant, Spring Hill Ford, as described above, an atomized fuel leak developed in the front fuel injector that caused the fire in Plaintiff's engine compartment, which led to the ensuing damage to the Plaintiff's vehicle.

15. As a result of the defendant's negligence, the plaintiff suffered damages in the sum of \$23,398.59, this damage being the damage to the vehicle as a result of the ensuing fire.

WHEREFORE, Plaintiff, [REDACTED] by Safeco Insurance Companies as Subrogee, requests judgment against the defendant Spring Hill Ford in the sum of \$23,398.59 plus costs.

Certification
The Signatures in this Computer are listed on the Investigator by Saffar, Director of Computer at Subways and the Attorney for the
Federal Party believe that this is the signature and belief.

Samuel A. Shelton, Ltd. _____

Atty. No.: 70212
Samuel A. Shelton, Ltd.
Edward L. Schiller & Associates
413 North LaSalle Street, Suite 500
Chicago, Illinois 60610
(312) 527-3080
FAX (312) 527-3080

ENBD-005-10-0277

6155136

Wisconsin Motor Vehicle Accident Report

Please Do Not Write In This Movable Space

Document Number Onside

INSTRUCTIONS
 Please read and check off the correct box or #1 pencil.
 Start Areas at above.
 Correct Mark
 Incorrect Mark
 73560

County

MUN/TWP

Accident Date

Time of Accident (Military Time)

Total Number

Hit & Run

- Government Property
- Fire (Hazard)
- Flames Taken (Narrative)
- Trailer or Load (Narrative)
- Truck or Bus (Last Page)
- Load Spillage
- Construction Zone
- Names Exchanged

Sheet No. 11
 of 11

ACCIDENT LOCATION

- Public Highway, Intersection/Reload
- Public Highway, Non-Intersection
- Parking Lot
- Private Property or Road

LATITUDE (GPS) Degree Minutes Seconds LONGITUDE (GPS) Degree Minutes Seconds

OH Hwy No. and Street Name CTH KD/ISSANE Estimated 4 ROADWAY ONE/ASSET RA
 Direction of Travel (Before or After)

User Number	User Type	Total Number of Occupants	Direction of Travel (Before the Accident)	User Number	User Type	Total Number of Occupants	Direction of Travel (Before or After)
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Speed Limit 55 55
 City & State CHICAGO, IL IL
 Driver's License Number 98 IL

Date of Birth 09-25-60 Sex M Operating as Operator Class Operator
 On Duty Accident Yes Yes Yes Yes Yes Yes

Severity 1 1 1 1 1 1
 SAFETY EQUIPMENT 1 1 1 1 1 1

TRAPPED/EXTRICATED 1 1 1 1 1 1

Street Address CHICAGO, IL IL

Year of Vehicle 97 Make FORD Model F150 Body Style TRK Color BLK

Vehicle ID Number 1FTEK1L69VA IL

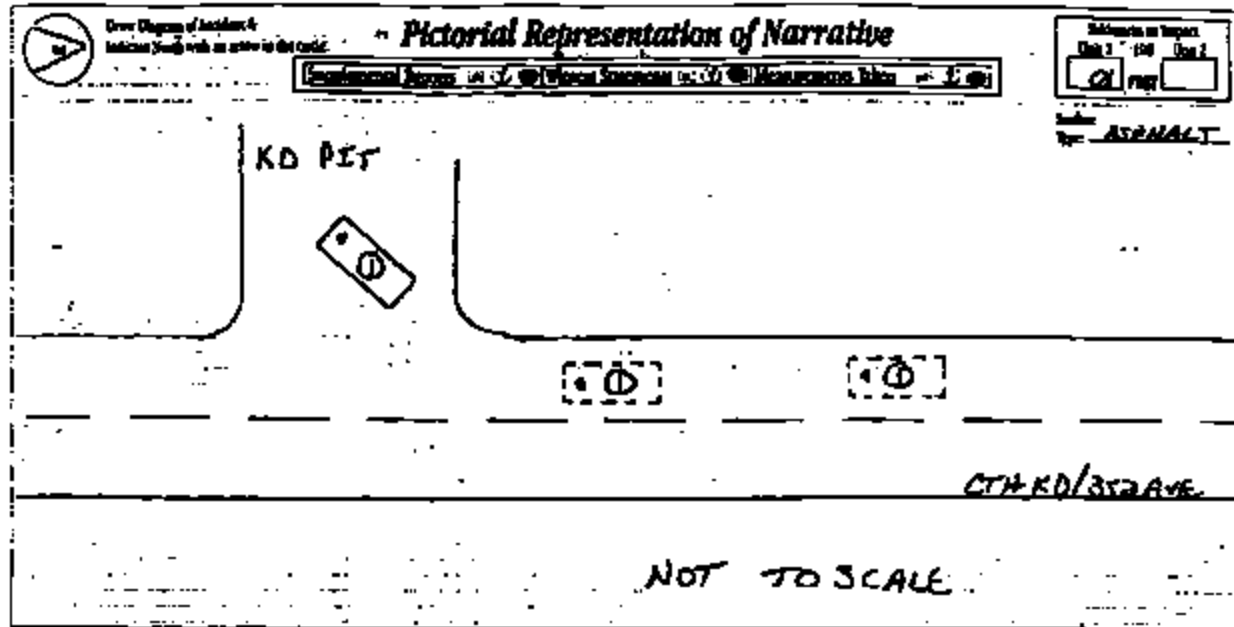
Policy Holder's Name SWANETT, IL

Occupant User Number 3 1 1 1 1 1

Address Same as Operator 1 1 1 1 1 1

ENR Number

97-78369
 47A
 07-10-97
 07-10-97



NARRATIVE

UNDERWAY WAS SIB ON CITY RD. UNIT 1 BEGAN TO BACK UP
DOWN AND VIBRATION OPERATOR OF UNIT 1 STOPPED
VIBR. AT ENTRANCE TO KD PIT. OPERATOR OPENED HOOD AND
SAW FLAMES IN ENGINE COMPARTMENT.
RANDALL FIRE DEPT. EXTINGUISHED FIRE AND CONTAINED
FIRE STOPPED ON ENGINE COMPARTMENT.

Photos By: []

What Drivers Were Doing

Unit Number	Unit Number
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100	100

ADDRESS: []

CITY & STATE: []

ZIP: []

ACCIDENT CHECKLIST

ROAD SURFACE CONDITION

WEATHER

ACCIDENT CHECKLIST

No Control (Unlimited Access)

Full Control (Only Ramp Emergency)

Partial Control

TRAFFIC WAY

Not Physically Divided (2-Way Traffic)

Divided Highway, Median Strip, without Traffic Barrier

Divided Highway, Median Strip, with Traffic Barrier

One-Way Traffic

Parking Lot or Drive Access

RELATION TO ROADWAY

On Roadway

Parking Lot or Drive Access

Shoulder (Other than Shoulder within Median or Gate)

Median (Other than Median within Gate)

Outside Shoulder-Left

Outside Shoulder-Right

Off Roadway - Location Unknown

On Ramp

Unknown

ROAD SURFACE CONDITION

Dry

Wet

Snow/Ice

Ice

Sand, Mud, Dirt, Oil

Other

Unknown

WEATHER

Clear

Cloudy

Rain

Snow

Fog, Smog, Smoke

Mist, Haze

Freezing Rain or Drizzle

Blowing Sand, Silt, Dust, Snow

Severe Crosswinds

Other

Unknown

Traffic Control

Unit Number	Unit Number
1	1
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6155136

Officer's Opinion of Possible Contributing Circumstances

Occurrence Number Override
All

Driver Factors

Unit Number	1 2 3 4 5 6 7 8 9 10 11 12
Unit Number	1 2 3 4 5 6 7 8 9 10 11 12
Unit Number	1 2 3 4 5 6 7 8 9 10 11 12
Unit Number	1 2 3 4 5 6 7 8 9 10 11 12
Unit Number	1 2 3 4 5 6 7 8 9 10 11 12
Unit Number	1 2 3 4 5 6 7 8 9 10 11 12
Unit Number	1 2 3 4 5 6 7 8 9 10 11 12
Unit Number	1 2 3 4 5 6 7 8 9 10 11 12

Vehicle Factors

Unit Number	1 2 3 4 5 6 7 8 9 10 11 12
Unit Number	1 2 3 4 5 6 7 8 9 10 11 12
Unit Number	1 2 3 4 5 6 7 8 9 10 11 12
Unit Number	1 2 3 4 5 6 7 8 9 10 11 12
Unit Number	1 2 3 4 5 6 7 8 9 10 11 12
Unit Number	1 2 3 4 5 6 7 8 9 10 11 12
Unit Number	1 2 3 4 5 6 7 8 9 10 11 12
Unit Number	1 2 3 4 5 6 7 8 9 10 11 12

Highway Factors

Unit Number	1 2 3 4 5 6 7 8 9 10 11 12
Unit Number	1 2 3 4 5 6 7 8 9 10 11 12
Unit Number	1 2 3 4 5 6 7 8 9 10 11 12
Unit Number	1 2 3 4 5 6 7 8 9 10 11 12
Unit Number	1 2 3 4 5 6 7 8 9 10 11 12
Unit Number	1 2 3 4 5 6 7 8 9 10 11 12
Unit Number	1 2 3 4 5 6 7 8 9 10 11 12
Unit Number	1 2 3 4 5 6 7 8 9 10 11 12

OFFICER INFORMATION

Officer Name: [Redacted]
 Law Enforcement Agency Address: [Redacted]
 No: 1000-SSST
 City & State: KEOSHA, W.V.
 Agency # [Redacted] Enforcement Agency [Redacted] Officer ID # [Redacted]
 100 KEOSHA S.O. 1100

Date of Report			Time Notified (Military Time)		Time Arrived (Military Time)		Date of Report		
MONTH	DAY	YEAR	HR	MIN	HR	MIN	MONTH	DAY	YEAR
05	29	97	19	46	19	54	05	29	97

Truck & Bus Accident Information (This Section Must Be Completed for Each Truck or Bus Involved in this Accident.)

When To Use This Section: Did the accident involve...
 A truck with at least two axles and six tires?
 A truck with a hazardous material placard?
 A bus designed to carry 16 or more persons, including the driver?
 STOP! If all the responses to Part A are "NO" do not complete this Truck & Bus Accident Information Section. If there are any "YES" answers, continue to Part B.
 Part B
 Any person who was fatally injured?
 Any injured person requiring transport for immediate medical treatment?
 One or more vehicles that had to be towed from the scene as a result of the accident?
 One or more vehicles that required repair or were provided assistance before proceeding from scene under own power?
 STOP! If all the responses to Part B are "NO" do not continue. If there are any "YES" answers, please complete this Truck & Bus Accident Information Section.

Hazardous Material Information

- Hazardous Material Class Numbers (1-5 digit)
- Hazardous Material TWF Numbers (4 digit)
- Hazardous Material Placard Deployed?
- Hazardous Cargo was Released?

List the Hazardous Material(s) by name in this load:

 List the Name(s) of Released Hazardous Material(s):

Carrier Information

Is Interstate Carrier?
 Carrier Name: [Redacted]

Carrier Identification Numbers

US DOT: [Redacted]
 MC# [Redacted]
 Carrier Address: [Redacted]

Source: Vehicle Side Shipping Papers Trip Manifest Driver Log Book

Vehicle Information

Vehicle Description: [Redacted]
 Gross Vehicle Weight Range: [Redacted] LBS Total # of Axles: [Redacted]

SEQUENCE OF EVENTS FOR THIS VEHICLE

1	2	3	4	5	6	7	8	9	10
1	2	3	4	5	6	7	8	9	10
1	2	3	4	5	6	7	8	9	10
1	2	3	4	5	6	7	8	9	10
1	2	3	4	5	6	7	8	9	10
1	2	3	4	5	6	7	8	9	10
1	2	3	4	5	6	7	8	9	10
1	2	3	4	5	6	7	8	9	10
1	2	3	4	5	6	7	8	9	10

Truck Body Type

1	2	3	4	5	6	7	8	9	10
1	2	3	4	5	6	7	8	9	10
1	2	3	4	5	6	7	8	9	10
1	2	3	4	5	6	7	8	9	10
1	2	3	4	5	6	7	8	9	10
1	2	3	4	5	6	7	8	9	10
1	2	3	4	5	6	7	8	9	10
1	2	3	4	5	6	7	8	9	10

Dispatch Unit Number	NAME Last	First	MI	Date of Birth	Sex	Severity	Star Position	SARBY	ARRNG
1-1-1-1-1 1-1-1-1-1 1-1-1-1-1	Street & Number	City & State	Zip			1-1 1-2 1-3 1-4 1-5			1-1 Deployed 1-2 Not Deployed 1-3 Not Applicable 1-4 Unknown
Address Same as Operator	SELECTED	1-1 Not Applicable 1-2 Family Licensed 1-3 Not Licensed	1-1 Not Applicable 1-2 Trapped/Rescued 1-3 Trapped/Not Rescued 1-4 Released	Medical Transport	Agency Spec				

Dispatch Unit Number	NAME Last	First	MI	Date of Birth	Sex	Severity	Star Position	SARBY	ARRNG
1-1-1-1-1 1-1-1-1-1 1-1-1-1-1	Street & Number	City & State	Zip			1-1 1-2 1-3 1-4 1-5			1-1 Deployed 1-2 Not Deployed 1-3 Not Applicable 1-4 Unknown
Address Same as Operator	SELECTED	1-1 Not Applicable 1-2 Family Licensed 1-3 Not Licensed	1-1 Not Applicable 1-2 Trapped/Rescued 1-3 Trapped/Not Rescued 1-4 Released	Medical Transport	Agency Spec				

Type of Accident

3-1 First Hazardous Object
New Hazardous Object

Unit Number	Link Number
1-1-1-1-1 1-1-1-1-1 1-1-1-1-1	1-1-1-1-1 1-1-1-1-1 1-1-1-1-1
(Select one per vehicle)	

Collision With Object Not Fixed

1-1 Motor Vehicle in Transport
1-2 Parked Motor Vehicle
1-3 Deer
1-4 Pedestrian
1-5 Railway Train
1-6 Other Animal
1-7 Motor Vehicle in Transport in Other Roadway
1-8 Other Object (Not Fixed)

Collision With Fixed Object

1-9 Traffic Sign Post
1-10 Traffic Signal
1-11 Utility Pole
1-12 Lum. Light Support
1-13 Other Post
1-14 Tree
1-15 Mailbox
1-16 Garagemall Post
1-17 Guardrail End
1-18 Median Barrier
1-19 Bridge Support End
1-20 Bridge/Overpass
1-21 Impact Accessory
1-22 Overhead Sign Post
1-23 Bridge End
1-24 Culvert
1-25 Ditch
1-26 Curb
1-27 Embankment
1-28 Fence
1-29 Other Fixed Object
1-30 Unknown

Non-Collision

31 Overturn
32 Fire/Explosion
33 Inversion
34 Jackknife
35 Other Non-Collision

Driver Condition

Unit Number	Unit Number
1-1-1-1-1 1-1-1-1-1 1-1-1-1-1	1-1-1-1-1 1-1-1-1-1 1-1-1-1-1

45 Driver Behavior (Or Pedestrian)

1-1 Appeared Normal
1-2 Reduced Alertness
1-3 Ability Impaired
1-4 Not Observed

46 Presence

1-1 Neither Alcohol nor Drugs Present
1-2 Yes—Alcohol Present
1-3 Yes—Drugs Present
1-4 Yes—Alcohol & Drugs Present
1-5 Unknown

47 Alcohol

1-1 Yes
1-2 No

1-1 Yes Not Given
1-2 Test Refused
1-3 Test Given, Alcohol Unknown
1-4 Test Given, No Alcohol Reported

48 Drugs

1-1 Yes Not Given
1-2 Test Refused
1-3 Test Given, Drugs Unknown
1-4 Test Given, No Drugs Reported
1-5 Drugs Reported (Specify Below)

1-6 Marijuana
1-7 Cocaine
1-8 Opium
1-9 Amphetamines
1-10 PCP
1-11 Other Drug Medication
1-12 Type Unknown

Unit # 1-1-1-1-1-1-1

49 Pedestrian Location

1-1 In Crosswalk
1-2 In Roadway
1-3 Not in Roadway
1-4 On Shoulder
1-5 Unknown

49 Pedestrian Action

1-1 Walking not Facing Traffic
1-2 Discouraged Signal
1-3 Daring into Road
1-4 Dark Clothing
1-5 Walking Facing Traffic

50 Manner of Collision

1-1 No Collision with Motor Vehicle in Transport
1-2 Rear-end
1-3 Head On
1-4 Apart to Apart
1-5 Angle
1-6 Sidewipe, Same Direction
1-7 Sidewipe, Opposite Direction
1-8 Unknown

51 Unit # 1-1-1-1-1-1-1

51 Driver Numbered Area(s) of Vehicle Damage

1-1 None
1-2 Undercarriage
1-3 Front Damage in All Areas
1-4 Other
1-5 Unknown

52 Extent of Damage

1-1 None
1-2 Some
1-3 Part Missing
1-4 Minor
1-5 Major
1-6 Unknown

Vehicle Towed Due to Damage: **HAZARDOUS MATERIAL**

Vehicle Reported by: **HAZARDOUS MATERIAL**

53 Unit # 1-1-1-1-1-1-1

53 Driver Numbered Area(s) of Vehicle Damage

1-1 None
1-2 Undercarriage
1-3 Front Damage in All Areas
1-4 Other
1-5 Unknown

54 Extent of Damage

1-1 None
1-2 Some
1-3 Part Missing
1-4 Minor
1-5 Major
1-6 Unknown

Vehicle Towed Due to Damage:

Vehicle Reported by:

Fixed Object struck

Code	Code	Code	Code	Code
1-1	1-2	1-3	1-4	1-5

Govt. Damage Est #

PROPERTY Last

ADDRESS Street & Number
City & State
Phone Number



Office of the General Counsel

Ford Motor Company
Parklane Towers West
Suite 400
Three Parklane Boulevard
Dearborn, Michigan 48122-2558

October 1, 1997

Safeco Insurance Companies
Chicago Branch Office
2800 W. Higgins Rd., Suite 1100
Hoffman Estates, IL 60196-5205
ATTENTION: SHEKHI MCGEE

Re: Claimant: [REDACTED]
D/E: July 12, 1997
Y/Claim #: [REDACTED]

Dear Ms. McGee:

We acknowledge your recent contact to Ford Motor Company. Your complaint has been directed to this office for further handling. In order to assist us in evaluating your claim, we request that you provide us with the following information:

- 1. The date of incident and the city and state in which it occurred.
- 2. A complete description of the incident, including events which occurred prior to and subsequent to the loss.
- 3. A copy of the police and/or fire report.
- 4. For each person alleged injured: full name, date of birth, home address, marital status and name of spouse, social security number, occupation, a complete description of the injuries, the names and addresses of all treating physicians, and copies of all medical bills and reports.
- 5. The vehicle year, model, and serial number.
- 6. The mileage on the vehicle at the time of the incident.
- 7. Original photographs of the vehicle's damage, from several different angles, or color laser copies.
- 8. Original photographs of the inside of the vehicle showing the steering wheel, dash and roof areas.
- 9. Original photographs of the accident scene showing the grade of the road.
- 10. What is the alleged defect?
- 11. Documentation to substantiate your defect allegation, including a copy of your expert's report and the expert's original photographs. *Reser copies only*
- 12. Has the alleged defective part been repaired or replaced? *no*
- 13. The present location of the alleged defective part and the vehicle. *Co Part Always Up*
- 14. The repair estimate, repair order, or your total loss worksheet for the *partlett 11*

RECYCLED MAIL
OCT 06 1997
- MIC (C)

no estimate. See pictures obvious total loss

SR# 667581

- vehicle's damage, and copies of draft payments.
- 15. A complete service history for the subject vehicle, including any tune-ups or oil changes.
 - 16. List any after market additions or modifications that were made to the vehicle. *None*
 - 17. We will be pleased to conduct non-destructive testing on your alleged defective part should you choose to remove the part and assembly and ship it at your own expense. Please follow the directions listed in the attached shipping instructions. *Do not wish to condemnate evidence*
 - 18. Lost wage verification (if applicable). *It will not be sent to you*
 - 19. Was the parking brake applied?
 - 20. Was the engine running?
 - 21. Were the keys in the ignition?
 - 22. Has any insurance company been advised of this incident? If so, please state the name, address, and telephone number of those insurance companies; their claim number; and the agent's name.
 - 23. If an attorney has been retained by you to settle this claim, please include his/her name, telephone number, and address.
 - 24. If this vehicle was purchased as used by the insured please provide: the date of purchase, mileage at the time of purchase, and from whom the vehicle was purchased.
 - 25. Other:

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 within 45 days, we will assume that you are not interested in pursuing a claim and we will close our file.

Please be advised that all necessary steps must 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.

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,

Nancy Carpenter
Nancy Carpenter
Claims Analyst

dmb

4/14/84 (Rev. 1-1-83)

TO: Rochelle Richardson

Claim Adjuster

Safeco Insurance Company

2800 Higgins Road

Suite 1100

Hoffman Estates, Illinois 60195

RE:

[REDACTED]

Wonder Lake, Illinois

1997 Ford 150 4x2 Super Cab

VIN: 1FTEX1769VK [REDACTED]

DOL: 7-12-97

Your Claim No. [REDACTED]

Our File No. 97RS1653

Prepared and submitted by:

R. Schwarz & Associates, Ltd.

3413 Greenbriar Drive

Glenview, Illinois 60025

R. schwarz & assoc's. Ltd.

3413 GREENBRIAR DRIVE • GLENVIEW, ILLINOIS 60025-4522

MAIN OFFICE
(847) 729-1270

NIGHT
(847) 729-3401

FAX
(847) 729-1279

24 HOUR FAX
(847) 729-1778

July 31, 1997

TO: Rochelle Richardson
Claim Adjuster
Safeco Insurance Company
2800 Higgins Road
Suite 1100
Hoffman Estates, Illinois 60195

RE:

[REDACTED]
Wonder Lake, Illinois
1997 Ford 150 4x2 Super Cab
VIN: 1FTEX1769VK [REDACTED]
DOL: 7-12-97
Your Claim No. [REDACTED]
Our File No. 97RS1653

Dear [REDACTED]

On July 24, 1997, you requested R. Schwarz and Associates Ltd. to conduct an investigation into the origin and cause of the fire in a 1997 Ford F-150 pickup truck. You advised that the vehicle had burned on Route 53 in Kenosha County, Wisconsin. Also, you advised that the vehicle was now located at NER, 31W120 Bartlett Rd., Bartlett, Illinois under stock number 667581 and could be examined at this location.

ERR-005-LC-0285

On July 25, 1997, the investigation was initiated with an examination of the fire damaged vehicle. At this time the following services were provided:

1. Numerous color photographs were taken.
2. The vehicle and fire debris was searched for evidence.
3. A study of the fire damaged vehicle occurred.
4. A vehicle checklist was completed.

Seventeen (17) of these photographs with descriptions are included herein as enclosure number one to this report. A completed copy of the vehicle checklist is included herein as enclosure number 2 to this report.

The fire damaged vehicle is a 1997 Ford F-150 extended cab pickup truck. At the time of our examination, the vehicle contained no license plates and the VIN tag was so damaged as to be unreadable. Therefore at this time, this office was unable to confirm the VIN number you supplied.

During the vehicle examination, it was determined and established from the physical fire damage, that the fire originated in the engine compartment. More specifically, the fire originated in the area of the front fuel injector on the passenger side of the engine. The burn, char and melting patterns revealed that the fire originated at this point and then spread upward and outward to other areas of the vehicle. The physical fire damage revealed the following:

1. That the oxidation patterns on the front exterior of the vehicle indicated the fire was more severe along the passenger side of the vehicle (See photographs 2 & 3).
2. That the fire inside the engine compartment spread into the interior of the vehicle (See photographs 1, 7 & 9).
3. That the copper electrical conductor from the rear of the alternator was melted to the top of the fuel rail (See photograph 12).
4. That melting was sustained to the side wall of the alternator and this melting was most intense on the side facing the front passenger side fuel injector (See photograph 14).

5. That oxidation was sustained to the entire length of the front passenger side fuel injector (See photograph 17).

Later during the investigation, a computer check was run to learn if any recalls were in effect for fuel related problems for this vehicle. No recalls were noted at this time.

SUMMARY OF THE INVESTIGATION

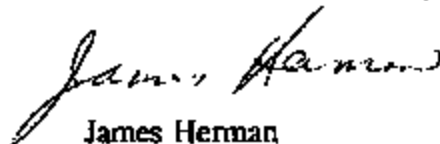
It is the opinion of the investigator from this office, that the fire that occurred on July 12, 1997, at Route 53 Kenosha County, Wisconsin, originated in the passenger side engine compartment, caused by a atomized fuel leak from the front fuel injector.

This office is recommending that you retain custody and control of this vehicle and that further you may wish to consult with an engineer concerning the mechanism of the failure that has occurred to the fuel injectors.

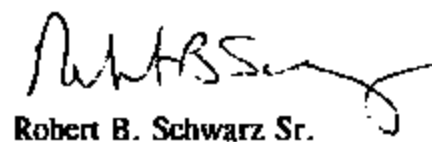
This report is based on data and information learned to date. If this office can be of further assistance to you in this or any other matter, please advise.

Respectfully submitted,

R. Schwarz & Associates, Ltd.


James Herman

Supervised by:


Robert B. Schwarz Sr.

JH/os

Enclosure

The direction the camera was facing is not important and will be omitted.
The vehicle was not examined at the loss site.

Photograph 1 -

Depicting a view of the fire damage sustained to the front of the vehicle. The hood was not available at the time of this examination.

Photograph taken by R. Schwarz & Associates, Ltd.

Photograph 2

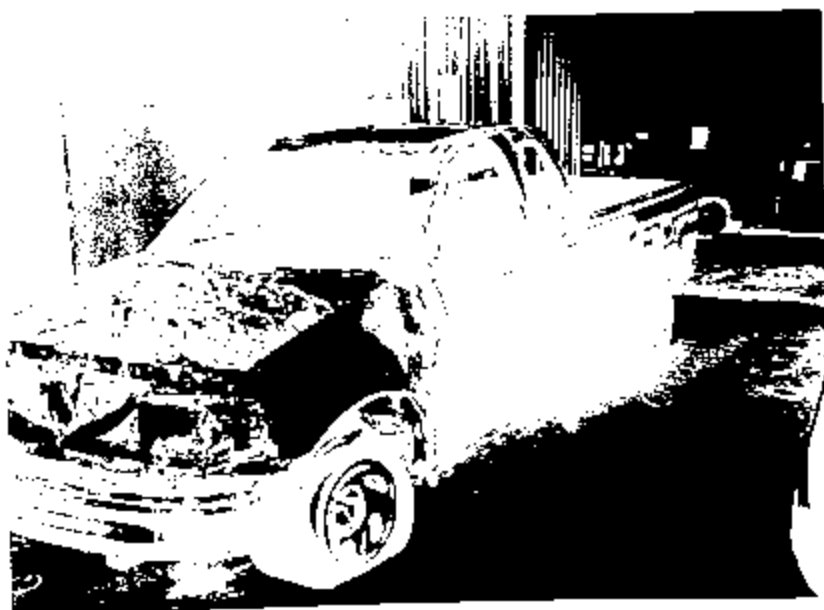
Depicting a view of the fire damage sustained to the drivers side of the vehicle.

Photograph taken by R. Schwarz & Associates, Ltd.



PHOTO

1



PHOTO

2

E985-885-LC-6291

Photograph 3

Depicting a view of the fire damage sustained to the passenger side of the vehicle.

Photograph taken by R. Schwarz & Associates, Ltd.

Photograph 4

Depicting a view of the fire damage sustained to the rear of the vehicle.

Photograph taken by R. Schwarz & Associates, Ltd.

PHOTO
3



PHOTO
4



CP83-605-LC-6283

Photograph 5

Depicting a view of the underside of the vehicle. The arrow depicts the fuel tank.

Photograph taken by R. Schwarz & Associates, Ltd.

Photograph 6

Depicting a view of the fire damage sustained to a portion of the underside of the engine compartment. The arrows depict the catalytic convertor and muffler.

Photograph taken by R. Schwarz & Associates, Ltd.

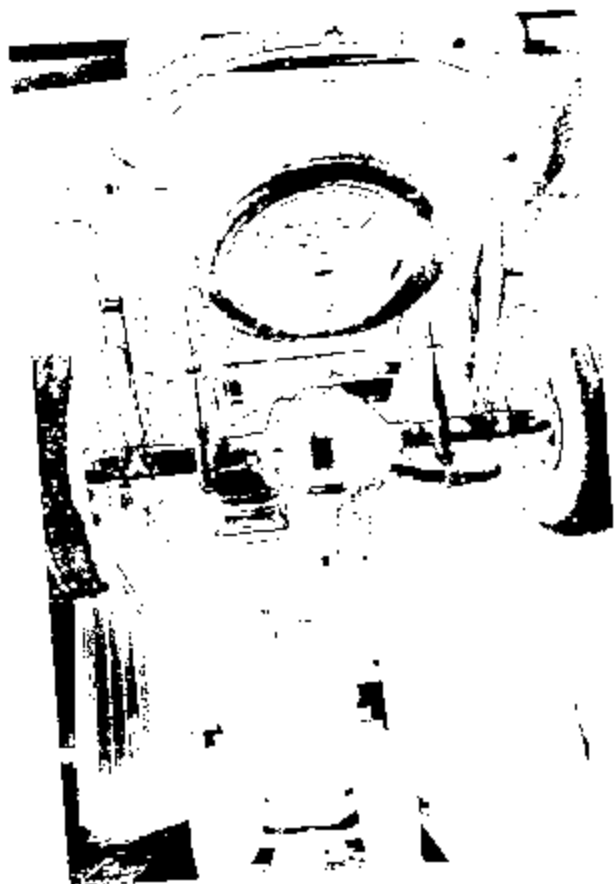


PHOTO
5



PHOTO
6

Photograph 7

Depicting a view of the fire damage sustained to a portion of the front dash and seat area. The arrows depict various electronic components from the dash board.

Photograph taken by R. Schwarz & Associates, Ltd.

Photograph 8

Depicting a view of the fire damage sustained to the key way side of the steering column. The arrow depicts the remains of the key way.

Photograph taken by R. Schwarz & Associates, Ltd.

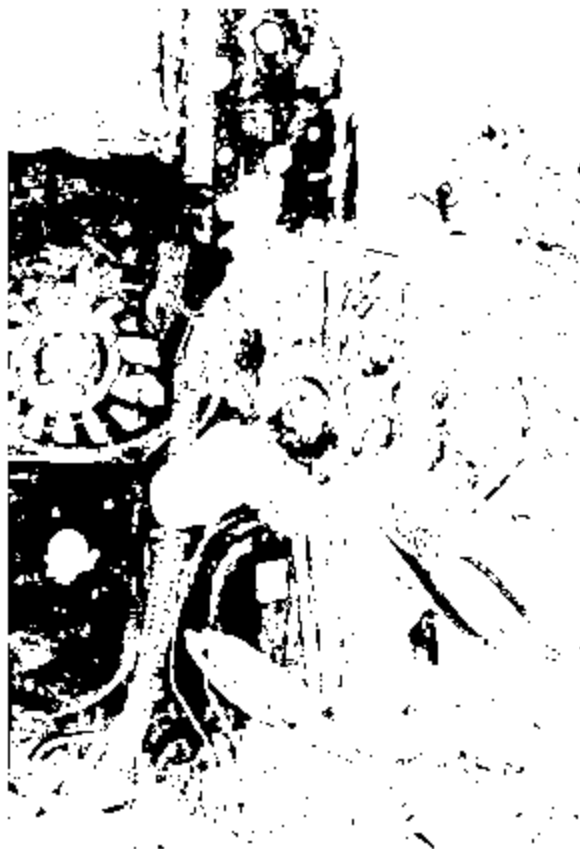
PHOTO

7



PHOTO

8



EA05-085-LC-0297

Photograph 9

Depicting a view of the fire damage sustained to the rear seat area of the vehicle.

Photograph taken by R. Schwarz & Associates, Ltd.

Photograph 10

Depicting a view of the fire damage sustained to a portion of the engine compartment.

Photograph taken by R. Schwarz & Associates, Ltd.



PHOTO
9



PHOTO
10

ERMS-803-LC-5299

Photograph 11

Depicting a view of the fire damage sustained to the passenger side of the engine compartment. The arrow depicts the area where the battery had been mounted.

Photograph taken by R. Schwarz & Associates, Ltd.

Photograph 12

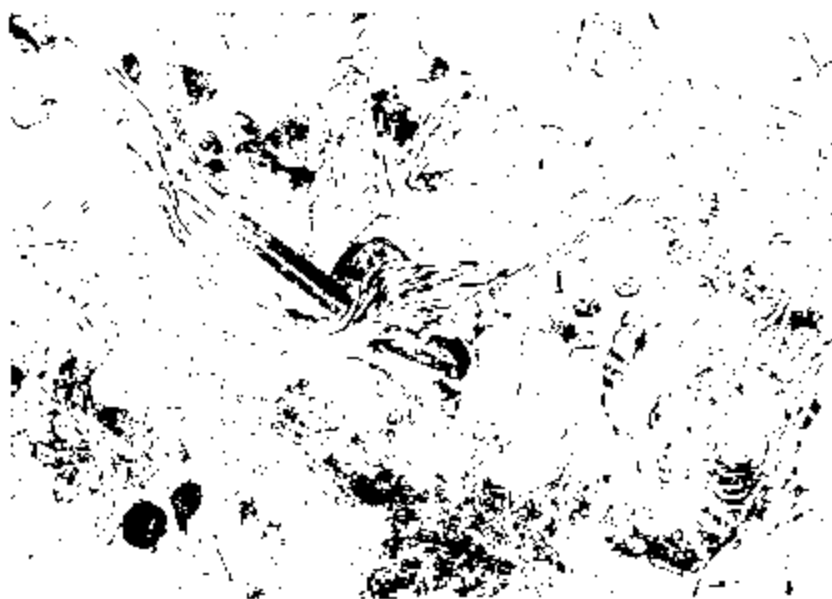
Depicting a view of the fire damage sustained to the fuel rail and injector on the passenger side of the vehicle. The bottom arrow depicts the fuel injector. The top arrow depicts melting of the copper electrical conductors on the top of the fuel rail.

Photograph taken by R. Schwarz & Associates, Ltd.

PHOTO
11



PHOTO
12



DAVIS-885-LC-6381

Photograph 13

Depicting a different view of the fire damage and melting sustained to the passenger side fuel rail and injectors.

Photograph taken by R. Schwarz & Associates, Ltd.

Photograph 14

Depicting a view of the fire damage and melting sustained to the alternator. The arrow depicts the front fuel injector on the passenger side.

Photograph taken by R. Schwarz & Associates, Ltd.



PHOTO
13



PHOTO
14

6285-005-LC-8363

Photograph 15

Depicting a different view of the fire damage and melting sustained to the intake manifold on the passenger side of the engine.

Photograph taken by R. Schwarz & Associates, Ltd.

Photograph 16

Depicting a view of the top of the front passenger side injector after the fuel rail has been lifted off.

Photograph taken by R. Schwarz & Associates, Ltd.

PHOTO
15



PHOTO
16



ER05-008-LC-8385

Photograph 17

Depicting a view of the fire damage sustained to the front passenger side fuel injector after it has been removed for photographing.

Photograph taken by R. Schwarz & Associates, Ltd.



PHOTO
17

ER85-885-LC-8387

R. SCHWARZ & ASSOCIATES, LTD. VEHICLE CHECK LIST

OUR CASE NUMBER: 97RS1653

Date Examined: 07-25-97

Year: 1997 Make: Ford Model: F-150

Color of vehicle: Black

Vin No: Unable to verify

Mileage of vehicle: Unknown

License plate no: None on vehicle

State:

Engine no: Unable to verify

Carburetor no: n/a

Transmission no: Unable to verify

****EXTERIOR CONDITION****

How many tires: Four (4) Condition of tires: Front burned - rear muddy

Brand of tires: General

Hubcaps/Wheels/Lug Nuts: Present

Condition of windows: Broken out by fire Power/Manual: Manual Position of windows: Down

Windshield: Broken out by fire

Rear Deck window condition: Broken out by fire

Trunk damage other than caused by fire: n/a

Trunk lid condition: n/a Trunk condition: n/a

Roof condition: Fire damaged

Hood condition: Not present

Gas Cap: Yes Burned: No Blown off: No

****INTERIOR CONDITION****

Doors locked/unlocked: Unlocked

Ignition position: Unable to verify Gear lever position: Park

Passenger compartment condition: Burned out by fire

Dash condition: Burned out by fire

****ENGINE COMPARTMENT****

Oil level: No dip stick present Brake Fluid level: Consumed By Fire

Transmission type: Automatic Transmission level: Full

Condition of battery: Fire Damaged

Condition of engine compartment: Severe fire damage

Hoses: Burned Belts: Burned

Electrical Cables and Wiring: Burned ground from rear of alternator welded to fuel injector line passenger side

****ADDITIONAL NOTATION****

Underside condition of vehicle: No Fire Damage

Evidence of possible theft: None

Vehicle damage other than fire: None

Notes: Forward two injector passenger side display sustained oxidation. Fuel rail lifts off passenger side easily, resistance on drivers side.

Triodyne Inc.
 Consulting Engineers & Scientists - Safety Philosophy & Technology
 5660 West Touhy Avenue, Niles, IL 60714-4810 (847) 677-4730
 FAX: (847) 647-0247
 e-mail: info@triodyne.com

Environmental Engineering
 Triodyne Inc. (Est. 1963)

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 Dallas Olson
 S. Carl Legler
- Mechanical Engineering**
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 Kenneth L. D'Emmario
 Richard A. Dittell
 Christopher M. Farnon
 Richard A. Grewell
 John M. Gumbelbacher
 Orville Helms
 Gary M. Miller
 Brian D. King
 Dan Kopinski
 Woodrow Nelson
 Peter J. Poczniak
 R. Keith Smith
 Henry T. Smith
 William G. Swaback
 Andrew H. Tator
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 Florence Leach
 Neil Miller
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 Susan Probstovack
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 Alvin Warner

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 Export Materials
 Center (EFC)
 Maria Forbes
 Chris Werner

- Contract Review**
 Ludwig Fuller

- Training and Editorial Services**
 Paul L. Barnett

- Video Services**
 Robert Neplan

- Graphic Communications**
 Thomas E. Zabinak
 Andrew B. Climer
 Charles R. Scott

- Model Laboratory**
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 Robert Neplan
 Bill Brown
 Matt Viscardi

- Vehicle Laboratory**
 Chester Brinkley

- Photography Laboratory**
 7850 Southfield Road
 Northville, MI 48168
 Larry Good

- Business Systems**
 Chris Ann Gorman
 Cheryl Bantz
 Brenda Christensen
 Peggy Dabick
 Dennis H. Duly

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 (847) 647-0745
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- Office Director**
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 S. Carl Legler

- Engineering Services**
 John R. Bingham, Jr.
 Richard Gullikson
 Charles C. Matheson
 William G. Sharkey
 Andrew M. Sells

- Literary/Publishing Services**
 Ludwig Fuller
 Shirley Horvath

August 14, 1997

Ms. Rochelle Richardson
 SAFECO Insurance
 2800 W. Higgins Road, Suite 1100
 Hoffman Estates, IL 60196

RE: SAFECO [REDACTED] Consultation
 Our File No. 56660.61673

Dear Ms. Richardson:

Pursuant to your request, I have inspected the [REDACTED] 1997 Ford F-150; the vehicle identification numbers (VIN) which are visible/readable are - - - - - L9VK [REDACTED]

DOCUMENTS REVIEWED

None

ACCIDENT DESCRIPTION

While driving his truck, [REDACTED] noticed that the vehicle was not operating properly. He pulled his vehicle over to the side of the road and opened the hood. He found the engine on fire.

Prior to the incident, [REDACTED] had noted that the fuel economy was gradually declining.

INSPECTION

An inspection was conducted by the writer at the Copart facility, 31W 120 West Bartlett Road, Bartlett, IL.

FIRE AND EXPLOSION
 Triodyne Fire & Explosion Engineers, Inc.
 (Est. 1987)
 2307 Sutherland Road
 Suite 100
 Oak Brook, IL 60521-1178
 (800) 873-7707
 FAX: (800) 523-7751

Office Director
 John A. Campbell
 Robert L. Egan
 S. Carl Legler

Engineering
 John A. Campbell
 Scott M. Howell
 Thomas H. Metz
 Robert F. Orsini
 Kim R. Mikoszewski

RECREATION ENGINEERING
 Triodyne Recreation Engineering, Inc. (Est. 1984)
 5660 West Touhy Avenue
 Niles, IL 60714-4810
 (847) 647-9982
 FAX: (847) 647-0785

Office Director
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 Jeffrey W. Abramson
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 Peter J. Poczniak

SAFETY RESEARCH
 Institute for Advanced Safety Studies (Est. 1986)
 5660 West Touhy Avenue
 Niles, IL 60714-4810
 (847) 647-1101

Chairman of the Board
 Robert L. Barnett

Director of Operations
 Paul L. Barnett

Information Services
 Ludwig Fuller

Senior Services Advisor
 Thomas Libar

MANUFACTURING
 Alliance Tool & Mfg. Inc.
 (Est. 1945)
 P1 East Willow Street
 Maywood, IL 60153-2307
 (312) 281-1712
 (708) 343-3444
 FAX: (708) 345-4004

CONSTRUCTION
 Triodyne-Wingler Construction Company Inc.
 (Est. 1963)
 5660 West Touhy Avenue
 Niles, IL 60714-4810
 (847) 647-9982
 FAX: (847) 647-0785

Office Director/Estimate Manager
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 Electrochem
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 Information Science
 David W. Lawrence, Ph.D.
 Safety Metallurgical Advisor
 Steven R. Schmidt, Ph.D.
 Food Processing Equipment

SEARCHED
 INDEXED
 SERIALIZED
 AUG 18 1997
 FBI - CO.

Page 2

RE: SAFECO [REDACTED] Consultation

DISCUSSION/OBSERVATIONS

The majority of the fire damage was located in the engine compartment and the passenger compartment as noted in photographs A-5 and A-16. There was very little fire damage located under the vehicle.

There was no evidence of an electrical fire as no visible balling or signs of arcing were noted.

The only abnormality noted was that the right side (passenger side) fuel injection rail assembly was not properly oriented at the front fuel injector (photos 20-A, 23, 24, 27, 28). The rail itself appears to be bent up away from the fuel injector. There appear to be no witness marks on the rail.

The right side front injector is located approximately 5" to 6" from the alternator.


CONCLUSIONS

[REDACTED] statements are consistent with a fuel leak at the front right fuel injector. The fuel injector system would operate normally as long as the seals at the fuel injectors were to maintain their integrity. A leak at a fuel injector would eventually cause the performance and fuel economy to suffer. As the integrity of the seal at the injector degrades, it will allow more fuel to escape and eventually the fuel pressure would drop to a point where it will be difficult to keep the engine running.

Due to the proximity of the alternator to the leaking fuel injector rail, it is an excellent source of ignition for the gasoline now in the engine compartment.

In order to establish conclusively that the mis-orientation of the fuel injector rail and the fuel injector was the source of the initial combustible material, additional testing is required.

Respectfully submitted,



Charly Sinkovits
Vehicle Systems & Service Specialist

CS/b



IN THE STATE COURT OF COBB COUNTY, GEORGIA, CIVIL ACTION #

PLAINTIFF: State Farm Mutual Automobile Insurance Company
(Our File #301-0836)

VS

DEFENDANT: Ford Motor Company

7-396-5

COMPLAINT FOR TORT OF NEGLIGENCE (PRODUCT LIABILITY)

STATEMENT OF FACTS

State Farm Mutual Automobile Insurance Company (hereinafter referred to as "Plaintiff") files this Complaint for damages against Defendant Ford Motor Company, and respectfully shows the Court as follows:

1. Defendant Ford Motor Company (hereinafter referred to as "Defendant") is a foreign profit business corporation registered to do business in the State of Georgia. Said Defendant may be served with process through its registered agent in the State of Georgia to-wit: Corporation Process Company, 180 Cherokee Street, N.E., Marietta, Cobb County, Georgia 30060.

2. Defendant designed, tested, manufactured, assembled, inspected, marketed, distributed and warranted a 2002 Ford F-150 Lariat, Supercab, 4-door short pickup truck, V.I.N.: 2FTPX17LX20 [REDACTED] (hereinafter "said product") prior to February 21, 2002.

3. [REDACTED] (hereinafter Plaintiff's Insured) purchased said product in the stream of interstate commerce prior to February 21, 2002.

4. Thereafter, Plaintiff's Insured used said product for its intended purpose without abuse and without modification.

5. On or about February 21, 2002, Plaintiff's Insured owned said product and was driving said product when said product caught fire and burned due to the breach within the fuel delivery system (hereinafter defective part).

6. As a result of the casualty described in the previous paragraph, property owned by Plaintiff's Insured was damaged in the amount of \$28,707.80 (salvage is undetermined).

7. Subsequent investigation revealed that Defendant had negligently designed; negligently tested; negligently manufactured; negligently assembled; negligently inspected; negligently marketed; negligently distributed said product in a defective condition at the time of first distribution and sale for use.

8. Subsequent investigation revealed that Defendant's negligence described in the previous paragraph was the proximate cause of the casualty described above and of the damages described above.

9. As a result, Defendant is liable as tortfeasor in the amount of \$28,707.80 (salvage is undetermined) for damages caused by the defective part.

10. Plaintiff has served Defendant a copy of: (a) Plaintiff's First For Admissions To Defendant; (b) Plaintiff's First Interrogatories to Defendant; and, (c) Plaintiff's First Request For Production of Documents To Defendant with the summons and complaint pursuant to O.C.G.A. 9-11-4(a)-(g).

11. Plaintiff has served Defendant a copy of: (a) Notice of Plaintiff's Desire To Settle This Litigation; (b) Notice of Plaintiff's Intention To Seek Attorney's Fees In The Event of A Default By Defendant; (c) Notice of Plaintiff's Intention To Seek Interest; (d) Notice of Service of Discovery Materials; and, (e) Notice of Conditional Stipulation For Extension of Time For Defendant with summons and complaint pursuant to O.C.G.A. 9-11-4(a)-(g).

**COUNT A: TORT OF NEGLIGENT DESIGNING; NEGLIGENT TESTING;
NEGLIGENT MANUFACTURING; NEGLIGENT ASSEMBLY; NEGLIGENT INSPECTION;
NEGLIGENT MARKETING; AND, NEGLIGENT DISTRIBUTION**

12. Plaintiff herein incorporates by reference the allegations contained in paragraphs 1 through 11 as if set forth herein.

13. Plaintiff shows that said defective part in said product, which was designed, manufactured, distributed and sold by Defendant was in a defective condition at the time of the first distribution and sale for use. Plaintiff shows that the defective condition existing in this vehicle included, but was not limited to:

a. A defective design of the defective part installed in said product.

b. The failure to warn and to continue to warn users, purchasers and registered owners of such products, by letter, recall notice, or other reasonable means, of the dangerous characteristics and properties of the defective part Defendant had a duty to exercise reasonable care to design, test, manufacture, assemble, inspect, market, and distribute safe products, so as to not subject purchasers or users or innocent third parties to an unreasonable risk of harm.

14. Defendant breached its duty to exercise reasonable care with respect to said product and defective part.

15. Defendant was negligent and acted in a willful and wanton manner in designing, testing, and/or manufacturing, inspecting, marketing, distributing and selling the installed defective part in such a manner and in such condition as to make said product inherently dangerous and defective.

16. Defendant's defective product failed as a result of the negligence of Defendant described in this Count so that Defendant's negligence was the proximate cause of the incident and resulting damages described above in the STATEMENT OF FACTS section of

Plaintiff's complaint; and, said incident and said damages was reasonable perceivable by Defendant at all times relative to Plaintiff's complaint.

COUNT B: STRICT LIABILITY OF DEFENDANT

17. Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 16 as if fully set forth herein.

18. Defendant is strictly liable in tort to Plaintiff for the losses suffered by Plaintiff because the defective part installed in said product was defective when distributed and sold by Defendant, was not merchantable and was not reasonably suited to the use intended, said defective condition having existed at the time of sale. Specifically, Plaintiff shows that the defects existing in the defective part installed in said product include, but are not limited to, defects in design and engineering of the defective part installed in said vehicle, defects which were unreasonably dangerous and pose an unreasonable risk of serious injury or death to the users of said product due to malfunctions of said product resulting from defective design and manufacture of the defective part.

19. Plaintiff further shows that Defendant failed to utilize economical and technically available safety design alternatives insofar as the design of the defective product is concerned.

20. Defendant's defective product failed as a result of the negligence of Defendant described in this Count so that Defendant's negligence was the proximate cause of the incident and resulting damages described above in the STATEMENT OF FACTS section of Plaintiff's complaint; and, said incident and said damages was reasonable perceivable by Defendant at all times relative to Plaintiff's complaint.

COUNT C: BREACH OF EXPRESS AND IMPLIED WARRANTIES BY DEFENDANT

21. Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 20 as if set forth verbatim herein.

22. The defective part installed in said product was not merchantable, nor was it reasonably suited for the use intended, and as such, Defendant breached the express and implied warranties of fitness for a particular purpose and of merchantability in that the defective part in said product posed an unreasonable risk of serious injury and death to its users due to the defective design of the defective part which allowed for the malfunction of said product.

23. Defendant's defective product failed as a result of the negligence of Defendant described in this Count so that Defendant's negligence was the proximate cause of the incident and resulting damages described above in the STATEMENT OF FACTS section of Plaintiff's complaint; and, said incident and said damages was reasonable perceivable by Defendant at all times relative to Plaintiff's complaint.

II. PRAYER FOR RELIEF AND DAMAGES

WHEREFORE, Plaintiff demands judgment against Defendant in the amount of \$28,707.80 (salvage is undetermined), plus 12% pre-judgment interest, one-third attorney fees in the event of default, costs and 12% post-judgment interest; and that a writ of fieri facias issue commanding all Sheriffs within the State of Georgia and their lawful deputies to execute said writ by levy and seizure of Defendant's goods and lands.

January 9, 2003

Ronald W. Parnell
Attorney for Plaintiff
State Bar Number 564450

Our File #301-0836
Post Office Drawer 81085
Conyers, Georgia 30013
(770) 929-8585 Answer Service

State Farm Insurance Companies



State Farm Insurance Claim Office
6301 Snappingoak Park Drive
Post Office Box 370568
Decatur, Georgia 30037-0568

Phone: (770) 893-8400

May 1, 2002

Claim Dept. Ford Motor Compan
Parklane Tower West Ste 400
3 Parklane Blvd
Dearborn, MI 48126

RE: Claim Number: [REDACTED]
Date of Loss: February 21, 2002
Our Insured: [REDACTED]

Dear Sirs:

We are writing to you with reference to damage which occurred on February 21, 2002.

The property is insured by our Company and the damage was in the amount of \$28,707.80.

Our investigation indicates you are responsible for this damage, and we are, therefore, looking to you for reimbursement.

If you have insurance, please refer this letter to your insurance company for discharge of your obligation, and inform us as to your insurance company name, address, and your policy number. If you do not have insurance, please forward your remittance in the above amount.

Please use the enclosed self-addressed envelope when replying so that your payment will receive prompt acknowledge.

Sincerely,

Bernard Brooks
Bernard Brooks
Claim Specialist
(770) 593-6526
1-866-796-4787 (Outside Metro Area)

State Farm Mutual Automobile Insurance Company

PRIVACY

02 MAY 14 2002

OFFICE OF THE
GENERAL COUNSEL

2/25/02
- \$28,708.80
- 102 F150
- VIN
- EXT

HOME OFFICE: BLOOMINGTON, ILLINOIS 61710-0001

ERR5-895-LC-8215

HARD FACTS

INVESTIGATIVE

ENGINEERING

Submitted To:
Kristen Hoehl
State Farm Insurance Company
1433 Highway 34 Building A
Farmingdale New Jersey 07727

AUTOMOTIVE ENGINEERING EXAMINATION OF

██████████
Claim # ██████████ MF

D/L: February 21, 2002

March 27, 2002

Hard Facts File #220318

HARD FACTS RESERVES THE RIGHT TO AMEND AND/OR ALTER THIS REPORT SHOULD NEW RELEVANT INFORMATION BECOME AVAILABLE.

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

UNLESS OTHERWISE INSTRUCTED, PHYSICAL EVIDENCE WILL ONLY BE RETAINED FOR ONE YEAR

46 Georgia Road, Freehold, N.J. 07728 ☎ (732) 462-2674
FAX (732) 409-6595 ✉ e-mail: hfacts@AOL.com

EA05-885-LC-5218

HARD FACTS

March 27, 2002

Kristen Hoehl
State Farm Insurance Company
1433 Highway 34 Building A
Farmingdale New Jersey 07727

Re: [REDACTED]
Claim # [REDACTED]
D/L: February 21, 2002

Dear Ms. Hoehl:

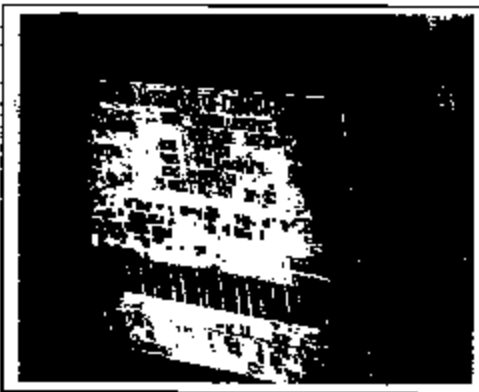
In accordance with your request, a forensic automotive engineering examination of the insured vehicle was initiated on March 19, 2002. Our field activity was conducted where the vehicle was staged as salvage at Car-Tech Auto Auctions in Avenel, New Jersey.

It is our understanding that the purpose of the assignment is to determine within reasonable engineering and scientific certainty the origin of cause of the vehicular fire occurrence.

To that end, the results and findings of our thorough field process follows.

DESCRIPTION OF THE VEHICLE

The subject vehicle is a 2002 Ford F-150 pickup truck that was manufactured in Oakville Ontario Canada. During assembly the vehicle was assigned unique 17 digit alphanumeric public vehicle



identification number 2FTRX17LXZC [REDACTED] Computerized scrutiny of this number has validated the vehicle's identity.

The best overall description of the vehicle is a domestically designed and Canadian manufactured pickup truck displacing an approximate curb weight of 6550 pounds.

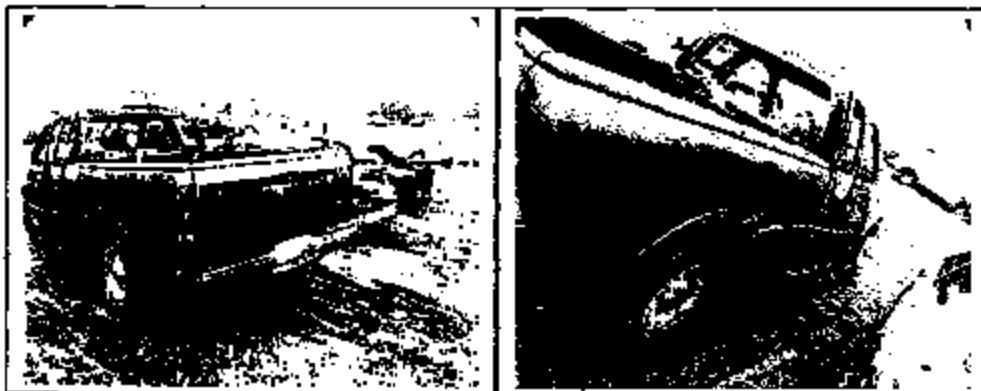
We were unable to report the vehicular mileage as the odometer assembly was consumed in the fire loss in question.

EXTERIOR EXAMINATION

The subject vehicle is finished green metallic in color and appointed with two cab doors completing the 221-inch long by 78-inch wide by 75-inch high platform.

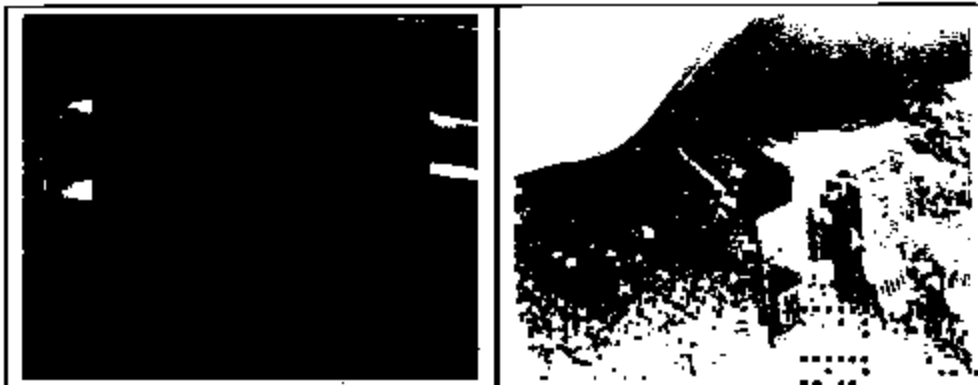


Initial exterior examination disclosed the vehicle sustained substantial fire damage in a gradient of greatest intensity at the nose section. All glazing was moltenized in the fire.



A wheelhouse examination disclosed the left front tire was fire consumed. The remaining tire assemblies exhibit near new tread depths registrations. With this thought in mind we conclude the vehicle sustained limited mileage.

Continued exterior examination disclosed the vehicle was registered in the state of Georgia as witnessed by license plate number [REDACTED]



The exterior is void of any historic unrepaired damage, whereas all observed damage is the result of the current loss in question.

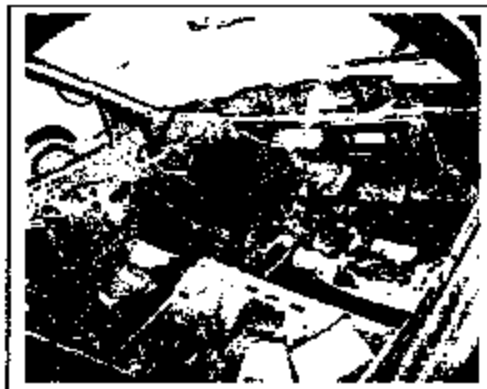
An examination of the undamaged rear platform assembly disclosed the vehicle was accessorized with a towing hitch and attendant wire harness assembly. An evaluation of the wire harness assembly has eliminated an electrical malfunction as a contributory element in the loss.

INTERIOR EXAMINATION

The subject vehicle is appointed with two front bucket seats as well as rear super cab jump type seats.

Due to the extent of fire damage we could not determine the construction detail or color of the upholstery.

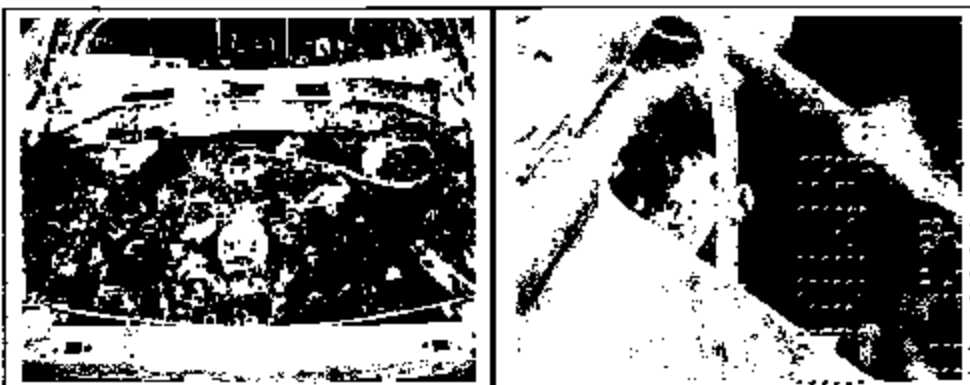
A forensic reconstruction of all interior components failed to disclose any aftermarket items. Numerous personal artifacts were observed in their partially destroyed condition amongst the char debris.



ORIGIN OF CAUSE

A forensic reconstruction of all physical evidence has established the fire locus point within the power plant compartment bay at the localized area of the fuel delivery system. Currently the bay area containing the 5.4L V8, gasoline fuel injected power plant is substantially damaged by fire.

All physical evidence examined is consistent with a breach that occurred to the power plant fuel delivery system that was under pressure. A pressurized discharge of highly atomized, oxygen-enriched gasoline was ignited when the fluid made contact with hot exhaust gas management systems. Subsequent to the inception, the fire progressional path initiated multiple secondary electrical dead short to ground fires, hence the fire event was very vigorous.

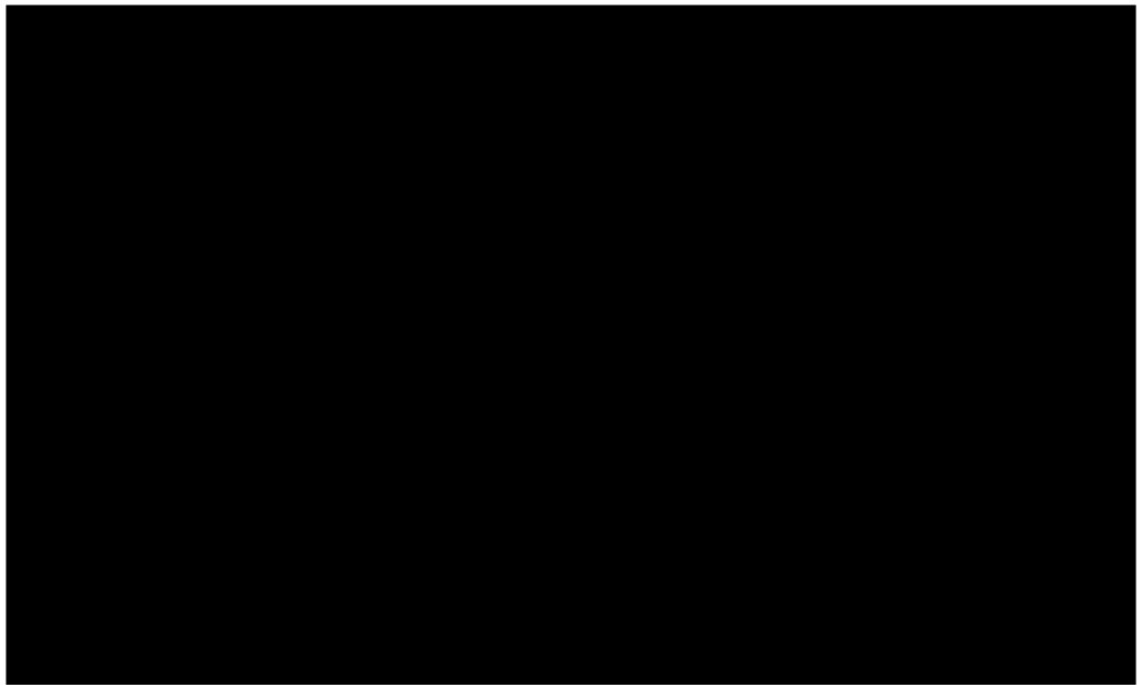


Analytical review of the loss, in conjunction with the observed evidence suggests the vehicle manufacture and the selling and servicing dealer are responsible for the loss in question.

ENGINEERING CONCLUSION

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

1. The fire loss is due to a breach within the fuel delivery system.
2. The fire loss has been attributable to poor pre-delivery and original manufacture. The manufacturer and its licensed selling dealer have been identified as responsible parties in the loss.



**GEICO
DIRECT**

1-800-841-3000

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

P.O. BOX 509090
SAN DIEGO, CA 92150-9090

August 1, 2000

Ford Motor Corp
P.O. Box 6248
Dearborn, MI 48121-6248

CLAIM NUMBER: [REDACTED]
INSURED: Sean [REDACTED]
YOUR INSURED: Ford Motor Corp
YOUR CLAIM #: Unk
YOUR VEHICLE: 1999 LMC
TAG #: 4eal351

LOSS DATE: 01/19/00

Dear Claims Department:

Our investigation shows your insured to be at fault in the accident.

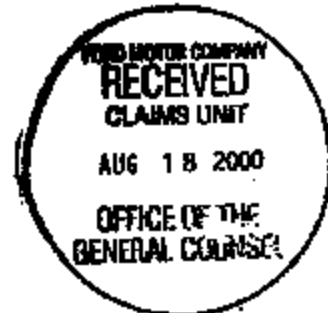
- Our vehicle was declared a total loss. Documentation is attached. Please honor our claim.
Amount paid to the insured: \$48,290.35
Insured's Deductible: \$None
Net Salvage Recovery: \$11,335.00
TOTAL: \$36,955.25

THANKS FOR YOUR PROMPT ATTENTION.

Very truly yours,

JUDY CRURCH (3671)

PAYMENT RECOVERY UNIT 800-654-5896 extension 5701
GEICO GENERAL INSURANCE COMPANY



35

PLEASE REFER TO OUR CLAIM NUMBER WHEN
WRITING OR CALLING ABOUT THIS CLAIM

SL54

CLL14

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

ER05-885-LC-5221



Unified
Investigations & Sciences, Inc.

42066-B Avenida Alvarado
Temecula, CA 92590
(909) 506-5654
Fax (909) 506-4116

PRIVILEGED AND CONFIDENTIAL

March 21, 2000

Report One

PREPARED FOR: Geico Insurance Company
PO Box 509060
San Diego, CA 92150-9060

ATTENTION: Robert Crause
(800) 654-5896 ext. 5987

INSURED: [REDACTED]

DATE OF LOSS: January 19, 2000

LOSS LOCATION: 8780 Fridtridge Rd. (CoPart)
Sacramento, CA

POLICY NUMBER: Unknown

CLAIM NUMBER: [REDACTED]

UIS FILE NUMBER: CA01-00289

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

ERR5-065-LC-5222

ASSIGNMENT

This assignment was received on March 10, 2000, and the investigation commenced on March 13, 2000. Instructions were to conduct an origin and cause investigation. Instructions were later updated to include researching the fuel system.

DETERMINATION OF ORIGIN AND CAUSE

This was an accidental fire that originated in the engine compartment and resulted from the failure of one of the two fuel lines between the fuel supply at the rear of vehicle and the fuel rail, which supplies the injectors.

Information and factors available to establish origin:

1. Burn indicators
2. Heat stress
3. Witness statements

Information and factors available to establish cause:

1. Burn indicators
2. Heat stress
3. Witness statements
4. Elimination of other causes

FIRE SCENE EXAMINATION

No one was present during the examination. This was a large, 4-wheel-drive sport utility vehicle (SUV). Directional references will be made to the driver's position for reference purposes.

The only alteration to the fire scene was that the vehicle had been relocated from the burn location to CoPart Salvage Yard, 8780 Fruitridge Rd., Sacramento, CA.

There was no exterior fire or smoke damage to the mid or rear sections of the vehicle. The two front fenders were both burned, with the left front fender displaying more heat stress to the metal. The plastic grill melted with more melting noted on the left side. The fiberglass hood was exposed to more heat at the left rear. The left front tire had more melted plastic than the right front tire. The left side windshield was exposed to more heat than the right side windshield. This was evident by smoke staining and random curve fractures.

The fire vented through all openings in the engine compartment.

The only contents observed in the vehicle were paper goods, which included a notepad and fast food wrappers.

The fire originated at the left rear area of the engine compartment near the fuel supply and return lines. The fire spread to the surrounding combustible components. The fire also ignited other plastics and ethylene glycol in the heater hoses on the right side of the engine compartment, although the heat on the right side of the engine compartment was considerably less than the left side. The fire spread through the bulkhead (firewall) into the passenger compartment on the left side of the dash. The left side of the dash burned and the floorboard below displayed melted plastic.

The right side of the vacuum booster for the break system had heat stress in the direction of the fuel lines. The firewall had considerable heat stress in this same area to the rear of the fuel lines. Both the supply and return fuel lines were burned in two at this location. The fire was caused by the failure of one of these two fuel lines. It is unknown which of these fuel lines failed. However, past experiences indicates the supply line fails more often than the return line because it has considerably more fuel pressure than the return line.

An exhibit included with this report that outlines the work performed by the dealer, Codioli Lincoln-Mercury. They replaced a coil assembly on the ignition system and a spark plug. There was no direct relationship between this work and the failure of the flexible fuel line that caused the fire. The flexible fuel line (between the fuel lines from the rear and the fuel rail attachment) is the weak-link in the fuel system. This is a common location of fuel system failure.

The recall on the fuel lines by Ford Motor Company was Recall #98S35 (see attachments). The only recall [REDACTED] received was for lug nuts about 6 months prior to the fire. This recall was researched and it involves metallic fuel lines in place of flexible fuel lines. It did not appear to be the components that failed on this unit. The recall included vehicles manufactured in August 1998. The insured's vehicle was manufactured in October 1998 and purchased in January 1999. According to the information obtained, the dealer did not install the recalled fuel lines.

INVESTIGATION

[REDACTED], insured, had his 'check engine' light illuminate about 30 days prior to the fire. After the light came on he took the vehicle into Codioli Lincoln-Mercury, Livermore, CA, where the vehicle was purchased. As far as he knew, the only work performed was the replacement of a spark plug. Prior to the fire [REDACTED] heard a fast clicking noise in the engine compartment. About this same time the 'check engine' light came on. About 1-2 miles after the light came on, the fire started.

Insured: [REDACTED]
UIS File #: CA01-00289

4

[REDACTED] smelled smoke 1-2 minutes before the fire but was unaware of where the smoke was coming from. As he pulled the vehicle to the side of the road, the engine quit. Once he was outside the vehicle, he observed a reflection off the pavement under the engine compartment. There was a lot of smoke. He attempted to open the hood but could only open it about one inch. [REDACTED] retrieved his dog and duck decoys from the back of the vehicle.

The fire originated in the engine compartment. The Stevenson Volunteer Fire Department arrived at the scene to extinguish the fire approximately 3-5 minutes after receiving the call. The fire started to spread into the driver's compartment when it was extinguished by the fire department. The fire department and highway patrol were both unaware of what started the fire. There were no after market items on the vehicle.

Weather was not a factor in the cause of this fire. No one had been smoking near the engine compartment prior to the fire. The windows were down and all the doors were closed at the time of the fire. The warning light for overheating did not illuminate prior to the fire. [REDACTED] did not know where under the hood the fire was concentrated.

COMMENTS

A verbal report was made to Robert Crause, Geico Insurance Company, on March 13, 2000. The incident report has been ordered and will be forwarded once it is received and reviewed. After sufficient time has passed to allow for the review of this report and its exhibits, contact will be made with Mr. Crause for further instructions regarding this file.

EXHIBITS

1. Vehicle inspection report
2. National Highway Traffic Safety Administration Recall Database
3. Ford Service Recall Bulletin
4. Photographs 1 through 29 with explanation sheet

Dave Stephan
Senior Investigator
Unified Investigations & Sciences, Inc.
530-877-4008 or 800-847-4124

EA85-005-1C-5225

PHONE: (800) 821-8070
In Alaska: (907) 442-1170

BASIC CLAIM INFORMATION FORM

FAX: (800) 821-7070

Office ID Number: [Redacted] Validation Request Number: _____
 Claim Rep Last Name: [Redacted] Adjuster ID: _____
 State Abbreviation: [Redacted] Effective Date: _____
 Policy Number: [Redacted] Bill To: _____ Class: _____
 Insured's Name: [Redacted] Owner's Name: [Redacted]
 Phone: [Redacted] Zip Code: [Redacted] Type of Loss: Theft Collision
 Fire Flood Other: _____
 Check CCC Response Form(s) Attached: Police Report(s) Repair Report(s) Medical History

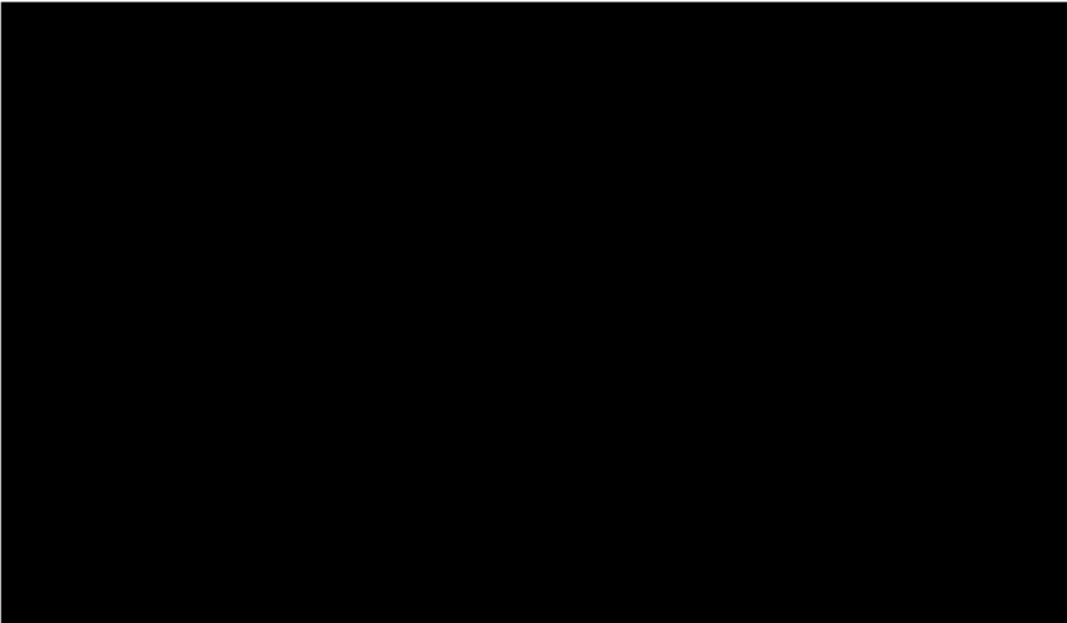
VIN: 5LMPK28L1X [Redacted]
 Model: ZX Lease date: 1/19/00 Year: 99 Make: [Redacted] Model: [Redacted]
 Body Style: ZDR Cab Light Cab & Chassis Fleet Passenger Motorcycle 1/2 Ton
 34 Ton (Tow) 4x4 4x2 2 1/2 Tons 3 1/2 Tons 4 1/2 Tons 5 1/2 Tons 6 1/2 Tons 7 1/2 Tons 8 1/2 Tons
 Region Code: [Redacted] 1 2 3 4 5 6 7 8 9 10
 Transmission: AT M S A C D G P F C

<input checked="" type="checkbox"/> Power Steering <input checked="" type="checkbox"/> Power Windows <input checked="" type="checkbox"/> Power Locks <input checked="" type="checkbox"/> Power Side Mirrors <input checked="" type="checkbox"/> Power Pass. Seat <input checked="" type="checkbox"/> ABS <input checked="" type="checkbox"/> Air <input checked="" type="checkbox"/> Fog Lamps <input checked="" type="checkbox"/> Cruise Control <input checked="" type="checkbox"/> Traction Control <input checked="" type="checkbox"/> 4 Wheel Disc Brakes <input checked="" type="checkbox"/> TL Traction Control <input checked="" type="checkbox"/> Air Load Level <input checked="" type="checkbox"/> 2nd Wheel Drive <input checked="" type="checkbox"/> Dual Air Conditioning <input checked="" type="checkbox"/> Keyless Entry <input checked="" type="checkbox"/> Night Truck <input checked="" type="checkbox"/> CD Radio <input checked="" type="checkbox"/> In-Dash <input checked="" type="checkbox"/> CD Changer/Player <input checked="" type="checkbox"/> Bose Music <input checked="" type="checkbox"/> Fully Sealed <input checked="" type="checkbox"/> 4x4 Suspension <input checked="" type="checkbox"/> 4x4 Drivetrain <input checked="" type="checkbox"/> 4x4 Transfer Case <input checked="" type="checkbox"/> 4x4 Suspension <input checked="" type="checkbox"/> 4x4 Drivetrain <input checked="" type="checkbox"/> 4x4 Transfer Case	<input checked="" type="checkbox"/> Air Conditioning <input checked="" type="checkbox"/> Rear Chubbage <input checked="" type="checkbox"/> 10 Wheel <input checked="" type="checkbox"/> Cruise Control <input checked="" type="checkbox"/> CD Changer <input checked="" type="checkbox"/> Locking Brakes <input checked="" type="checkbox"/> 4 Wheel Disc Brakes <input checked="" type="checkbox"/> TL Traction Control <input checked="" type="checkbox"/> Air Load Level <input checked="" type="checkbox"/> 2nd Wheel Drive <input checked="" type="checkbox"/> Dual Air Conditioning <input checked="" type="checkbox"/> Keyless Entry NO OF OPTIONS <input checked="" type="checkbox"/> SR Vinyl Roof <input checked="" type="checkbox"/> RF Chevrolet Roof <input checked="" type="checkbox"/> CR Truckle Size <input checked="" type="checkbox"/> SO Chocks Shim <input checked="" type="checkbox"/> ME Standard Wheel <input checked="" type="checkbox"/> MS Maxima Wheel <input checked="" type="checkbox"/> PL Flip Seat <input checked="" type="checkbox"/> TT T-Tow Hook <input checked="" type="checkbox"/> CR Wheel 7 Speed Gear <input checked="" type="checkbox"/> Red Hook <input checked="" type="checkbox"/> FM Remoteless Transfer <input checked="" type="checkbox"/> GO Deluxe Cover <input checked="" type="checkbox"/> FO Full Wheel Cover <input checked="" type="checkbox"/> WH Wheel <input checked="" type="checkbox"/> MC 5x5 Drivers	<input checked="" type="checkbox"/> 88 Step Adapter <input checked="" type="checkbox"/> SR Mirrors Step Window <input checked="" type="checkbox"/> XT Auxiliary Fuel Tank <input checked="" type="checkbox"/> 21 Tire Tread Pattern <input checked="" type="checkbox"/> 22 Super 2-Way Pilot <input checked="" type="checkbox"/> 23 Multiple Pin <input checked="" type="checkbox"/> 24 Tinted Glass <input checked="" type="checkbox"/> 25 Deep Tread Glass <input checked="" type="checkbox"/> 26 Roll Top <input checked="" type="checkbox"/> 27 Tow Top <input checked="" type="checkbox"/> 28 Fog Lights <input checked="" type="checkbox"/> 29 Working Beards <input checked="" type="checkbox"/> 30 Roll Mirrors <input checked="" type="checkbox"/> 31 For Riding Gear <input checked="" type="checkbox"/> 32 Dual Exhaust <input checked="" type="checkbox"/> 33 Third Gear <input checked="" type="checkbox"/> 34 Fourth Gear <input checked="" type="checkbox"/> 35 Chrome Rod Flute OTHER OPTIONS <input checked="" type="checkbox"/> 36 Worklight <input checked="" type="checkbox"/> 37 Radio Stereo <input checked="" type="checkbox"/> 38 Radio Stereo <input checked="" type="checkbox"/> 39 Power Windows <input checked="" type="checkbox"/> 40 Power Windows <input checked="" type="checkbox"/> 41 Tow Hitch <input checked="" type="checkbox"/> 42 Tow Hitch	<input checked="" type="checkbox"/> TP Training Package <input checked="" type="checkbox"/> 43 Roll Bar <input checked="" type="checkbox"/> 44 Removable Bed Bar <input checked="" type="checkbox"/> 45 Bed Cap <input checked="" type="checkbox"/> 46 Floor Mats <input checked="" type="checkbox"/> 47 Traction Control <input checked="" type="checkbox"/> 48 Dual Fuel Intake <input checked="" type="checkbox"/> 49 Rear Window Restraint <input checked="" type="checkbox"/> 50 Mirror & Window Wash <input checked="" type="checkbox"/> 51 Steel Capable Chain <input checked="" type="checkbox"/> 52 Steel Hitch <input checked="" type="checkbox"/> 53 12 Passenger <input checked="" type="checkbox"/> 54 15 Passenger <input checked="" type="checkbox"/> 55 7 Passenger <input checked="" type="checkbox"/> 56 8 Passenger <input checked="" type="checkbox"/> 57 9 Passenger
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Paint: (1) Black (2) Maroon (3) Copper
 Date Painted: _____
 Purchase Price: _____
 Mileage: _____
 Leather Vinyl Cloth
 Carpet Kit: _____
 Purchase Price: _____
 Date (MMYY): _____
 Special Vehicle: _____
 Purchase Price: _____
 Date (MMYY): _____
 Other: _____
 Stationary Reconditioned Asset

Rate with # of Months	B=Weighted (per month) or fixed	C=Constant	D=Constant	A=Average Rate	R=Range
M Mechanical	A E D C				
EE Body/Chassis	N E D C				
F Engine	E E D C				
I Interior	E E D C				
T Tires	E E D C				

Pay The Adjustment 1: _____ Add _____ Deduct _____
 Pay The Adjustment 2: _____ Add _____ Deduct _____
 Sales Tax: _____ % (Leave Blank if using Rate Tax) Deductible: _____
 Pay The Adjustment 3: _____ Add _____ Deduct _____
 Pay The Adjustment 4: _____ Add _____ Deduct _____



NO. 53,412 B

[REDACTED]

§ IN THE 18th DISTRICT COURT
§
§
§ OF
§
§ RANDALL COUNTY, TEXAS

v.
FORD MOTOR COMPANY

PLAINTIFFS' ORIGINAL PETITION AND REQUEST FOR DISCLOSURE

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES [REDACTED] Plaintiffs, complaining of FORD MOTOR COMPANY, Defendant, and for cause of action would respectfully show:

I. DISCOVERY LEVEL

Plaintiffs allege that discovery in this matter is intended to be conducted under Level 1 of Texas Rules of Civil Procedure 190.2 because this suit involves only monetary relief aggregating not more than \$50,000.00 excluding court costs and prejudgment interest.

II. PARTIES

Plaintiffs [REDACTED] are individuals residing in Amarillo, Texas, having an address there of [REDACTED] Texas. FORD MOTOR COMPANY, Defendant, is a foreign corporation existing under the laws of the State of Delaware, and may be served with process by serving its agent for service, C. T. Corporation Systems at 350 North St. Paul, Suite 2900, Dallas, Tarrant County, Texas.

III. SUBJECT VEHICLE'S MANUFACTURER-SELLER

Defendant FORD MOTOR COMPANY was at the time of this occurrence and is now engaged in the business of designing, manufacturing, selling and servicing motor vehicles, including

158-02 Hanna vs. Ford Motor Company
Plaintiff's Original Petition

COPY

FILED
Page 1 of 5
25.08.2003 09:44
JO CARTER, DISTRICT CLERK
RANDALL COUNTY, TEXAS
DEPUTY

ERS-885-LC-5227

the 2002 Ford F-150 pickup truck VIN #1FTRF17L32N [REDACTED] (herein the "subject FORD vehicle"). The subject FORD vehicle was purchased new by Plaintiffs from a duly authorized FORD dealer, Gene Messer Ford, Amarillo, Texas, on or about April 29, 2002.

IV. PLAINTIFFS USE OF VEHICLE

The subject FORD vehicle was purchase by Plaintiffs for family transportation and was utilized from date of purchase to date of loss for that purpose. The total mileage shown on the odometer of the subject FORD vehicle after manufacture to September 3, 2002, being the date of loss was Four Thousand One Hundred (4,100) miles.

V. AFTER PURCHASE ALTERATION(S)/ADDITION(S)/MODIFICATION(S)

Plaintiffs nor anyone at their direction made after purchase alteration(s), addition(s) or modification(s) to the subject FORD Pickup. Therefore Plaintiffs allege that the vehicle was not altered in any manner after purchase.

V. SITUS OF LOSS, ALLEGATION OF VENUE

On or about September 3, 2002, being four months and five days after purchase, Plaintiff, [REDACTED] was operating the subject FORD vehicle in an ordinary manner and under ordinary conditions on Interstate Highway,27 North bound near Canyon, Randall County, Texas, when the subject FORD vehicle malfunctioned and its vehicle's engine compartment suddenly became engulfed in flames causing irreparable damage to the subject FORD vehicle rendering it not susceptible to restoration as more particularly set forth hereafter.

VI. ORIGINAL DEFECT

Plaintiffs allege that the subject FORD vehicle had an original defect when it was constructed or built by FORD MOTOR COMPANY as shown by the age, mileage and use of the

subject FORD vehicle for ordinary purposes and ordinary conditions during the time intervening between the date of purchase and date of malfunction.

VII. FIRST ALTERNATIVE PLEADING

In addition Plaintiffs plead in the alternative that Defendant FORD MOTOR COMPANY impliedly warranted to the public generally, and specifically to the Plaintiffs, that the subject FORD vehicle was of merchantable quality and suitable for the purpose intended when used under ordinary conditions and in an ordinary manner. Plaintiffs relied on implied warranties and suffered the damages set forth herein as a proximate result of the breach thereof.

VIII. SECOND ALTERNATIVE PLEADING

Plaintiffs cannot specifically allege the acts of negligent manufacture and/or design on the part of Defendant FORD MOTOR COMPANY, for the reason that facts in this regard are particularly within the knowledge of the defendant; pleading further in the alternative, in the event Plaintiffs is unable to prove specific acts of negligent design or manufacture, Plaintiffs rely on the doctrine of *res ipsa loquitur*. In this connection, Plaintiffs would show that the design and manufacture of the subject FORD vehicle was within the exclusive control of Defendant FORD MOTOR COMPANY. Plaintiffs had no means of ascertaining the method or manner in which the product was designed and manufactured, and it came into Plaintiffs's possession in the same condition it was when it left the control of the defendant. The occurrence causing damage to Plaintiffs, as described herein, was one which in the ordinary course of events, would not have occurred without negligence on the part of Defendant. Thus, Defendant FORD MOTOR COMPANY was negligent in the design and manufacture, or both, of the subject FORD vehicle, which negligence was a proximate cause of the damages sustained by Plaintiffs.

IX. DAMAGES

Plaintiffs allege that the value of the subject FORD vehicle prior to its malfunction while being used for ordinary purposes and in an ordinary manner was the sum of \$26,047.00 and that the reasonable market value in and around the Randall/Porter County, Texas of the subject FORD vehicle after the fire was the sum of \$500.00 resulting in a loss to Plaintiffs of \$ 25,547.00.

PRAYER

WHEREFORE, Plaintiffs requests that FORD MOTOR COMPANY be cited to appear and answer and, on trial hereof, Plaintiffs have:

1. Judgment against FORD MOTOR COMPANY for the sum of \$ 25,547.00 being the net loss to Plaintiffs of their 2002 model FORD vehicle.
2. Statutory interest from 180 days after date of demand that date being July 23, 2003 until judgment;
3. Post judgment interest in accordance with law;
4. Costs of suit;
5. Such other and further relief to which Plaintiffs may be justly entitled.

Not to be Read to the Jury

This is a subrogation action wherein the Plaintiff's insurance carrier, SOUTHERN FARM BUREAU CASUALTY INSURANCE COMPANY joins the named Plaintiffs as a Plaintiff herein, and seeks to recover its loss in the amount of \$25,047.00 by reason of property damage coverages afforded to its insureds [REDACTED] under Policy No. 21100482 and under which policy SOUTHERN FARM BUREAU CASUALTY INSURANCE COMPANY paid to [REDACTED] or on/for Plaintiffs' behalf the

sum of \$25,047.00. This suit is brought in the name of [REDACTED]
[REDACTED] for their deductible in the amount of \$500.00, the foregoing amounts shall bear interest at the statutory rate in accordance with law. To evidence the foregoing contractual subrogation rights of Plaintiff, SOUTHERN FARM BUREAU CASUALTY INSURANCE COMPANY, attaches hereto true and correct copy of check stubs for Check No. 020766 in the amount of \$25,189.26, Payee FORD MOTOR CREDIT CORPORATION (FMCC) and Check No. 020774 in the amount of \$357.74 payable to Candance J. Hanna and Trace Hanna attached hereto and labeled Exhibit "A".

RESPECTIVELY SUBMITTED,



ELROY D. SIMNACHER

SBN: 18380000

Attorney for Plaintiffs

3233-63rd Street, Suite B

Lubbock, TX 79413

806/795-4300 FAX: 806/795-8939

PHOTO LOG
CLAIM NO. [REDACTED]File
name
4115

- 4116 Photo #1 - View of the front of the 2002 silver F150 pickup.
- 4116 Photo #2 - Close up of the engine compartment area noting the front area. The grill is gone and the passenger side radiator is gone. Heavy damage is noted to the hood.
- 4117 Photo #3 - View of the top of the hood, taken from the front of the vehicle, and the windshield. This is noting the fire damage to this area.
- 4118 Photo #4 - View of the left driver's side of the vehicle.
- 4119 Photo #5 - View of the gas fill area. This is on the left side of the vehicle in the front of the bed.
- 4120 Photo #6 - View of the rear of the truck.
- 4121 Photo #7 - View of the license plate at the rear of the truck.
- 4122 Photo #8 - View of the truck, which was taken from the rear shooting forward.
- 4123 Photo #9 - View of the right passenger side of the vehicle.
- 4124 Photo #10 - Close up of the right front fender area on the passenger side of the truck.
- 4125 Photo #11 - Close up of the front left fender area on the driver's side.
- 4126 Photo #12 - View of the hood area, taken from the front, and of the damage to the windshield.
- 4127 Photo #13 - View of the bottom side of the engine compartment hood, noting the damage to it, and that the bottom rear side of the hood is consumed.
- 4128 Photo #14 - Close up of the engine compartment hood and the firewall area, showing the damage to the hood and that part of the hood is consumed in this area.
- 4129 Photo #15 - Overall view of the engine compartment, taken from the front of the vehicle.

- 4130 Photo #16 - View taken from the left driver's side shooting to the right passenger's side of the engine compartment.
- 4131 Photo #17 - View taken from the right passenger side shooting to the left driver's side of the engine compartment.
- 4132a Photo #18 - Taken from the right passenger side rear of the engine compartment, shooting forward, noting the damage to the radiator and that the right side radiator is consumed by the fire.
- 4133 Photo #19 - View of the wiring harness on the right rear side of the engine compartment.
- 4134 Photo #20 - Another view of the wiring harness, this on the center section of the vehicle at the rear of the engine compartment.
- 4135 Photo #21 - View of the main load center, and the wiring harness on the left driver's side of the vehicle. All three photographs no evidence of electrical malfunction.
- 4136 Photo #22 - View of the left side of the engine, near the throttle body area. This photograph was taken from the driver's side shooting towards the passenger side.
- 4137 Photo #23 - Front view of the area where the throttle body is located. This was taken from the front of the vehicle.
- 4138 Photo #24 - View of the right side of the throttle body area. This was taken from the passenger side shooting to the driver's side.
- 4139 Photo #25 - Close up view of the left driver's side of the vehicle.
- 4140 Photo #26 - Close up view of the center of the engine compartment. This was taken from the front of the vehicle.
- 4141 Photo #27 - View of the right side of the engine compartment. This is the passenger side of the engine compartment.

- 4142 Photo #28 - View of the driver's side of the passenger compartment.
- 4143 Photo #29 - Close up of the VIN on the driver's door of the vehicle.
- 4144 Photo #30 - View of the driver's dash area taken from behind the driver's seat shooting forward.
- 4145 Photo #31 - View of the fuse block area. This is located on the left lower dash of the passenger compartment.
- 4146 Photo #32 - View of the driver's floor, taken from the driver's side of the vehicle.
- 4147 Photo #33 - View of the AM/FM cassette receiver, located in the middle of the vehicle.
- 4148 Photo #34 - View of the passenger side of the vehicle, shooting to the driver's side. This was taken from the passenger side.
- 4149 Photo #35 - View of the air bag and the damage noted to the dash of the passenger compartment, taken from the passenger side.
- 4150 Photo #36 - Close up of the damage to the dash area in the middle and passenger side. This photo was taken from the passenger side of the vehicle.
- 4151 Photo #37 - View of the passenger floor area, taken from the passenger side.
- 4152 Photo #38 - View of the passenger compartment roof and roof liner. There was no damage noted. This was taken from the passenger side of the vehicle.
- 4153 Photo #39 - View of the rear bottom side of the vehicle. There was no damage noted. The spare tire is in place.
- 4154 Photo #40 - View taken from the front side of the vehicle, shooting to the rear of the bottom side. Moderate fire damage is noted to the engine area.
- 4155 Photo #41 - View of the engine oil sample and transmission oil sample taken from the vehicle and submitted to Armstrong Forensic Laboratory.

4156 Photo #42 -

View taken from the driver's floor shooting up into the dash area, noting there is no damage in this area.

172640
photolog
ST/ce

Armstrong

Forensic Laboratory

330 Lock'n Green Trail, Arlington, Texas 76012
817-325-2691 Fax: 817-325-1883



Andrew T. Armstrong, Ph.D.
John M. Carr, MS, BS
Marion K. Armstrong, MSPH, CIH

September 25, 2002
Corrected Report: September 27, 2002

Claims Department
Texas Farm Bureau Insurance Company
4322 Canyon Drive, Building 3
Amarillo, TX 79110

Invest: Scottie Taylor
Texas Farm Bureau Insurance Company
File: 172840-06
Claim: 17284006

Insured: [REDACTED]
Amarillo, TX
DOL: 09/03/02

LABORATORY REPORT: A2GA3470

Two oil samples were received on September 18, 2002, for laboratory analysis. Oil samples are analyzed by Atomic Absorption Spectroscopy (AAS) and Fourier Transform Infrared Spectroscopy (FTIR) for certain metals and other contaminants. The concentration of these metals in the oil is recognized as a measure of mechanical deterioration and may be utilized to evaluate possible component failure. Materials measured include metals, water and other contaminants foreign to normal engine or transmission fluids. The presence of water markedly reduces the lubricating qualities of the fluid and typically results in component failure. The presence of ethylene glycol in engine oil indicates the source of any water is most probably the cooling system. Oil analysis should be used as a preliminary determination of mechanical wear. Final confirmation should be made through mechanical breakdown and visual inspection.

The engine oil was dark brown in color. No water was visible and none was detected by FTIR examination. Metals analyses established an elevation in the level of copper indicative of elevated wear to the main bearings. The silicon content is high and may be the result of the use of a silicone based oil or additive. No sugar, glycol, sand or metal fragments were detected. Failure is not indicated.

The transmission fluid was red in color with a varnish odor. No water was visible and none was detected by FTIR examination. Metals analyses established an elevation in the level of copper indicative of wear to the clutches and discs. Failure is not indicated. No sand, water or metal fragments were detected.

Armstrong Forensic Laboratory, Inc.
Report No: A2GA3470
Page 2 of 2

WEAR METALS			
Metal	Engine Oil	Transmission Fluid	Units
Iron	40	14	ppm
Chromium	0.8	nd	ppm
Lead	4	6	ppm
Tin	2	1	ppm
Silicon	282	6	ppm
Copper	45	61	ppm
Silver	nd	nd	ppm
Nickel	0.6	0.3	ppm
Aluminum	7	2	ppm
Magnesium	21	nd	ppm
Sodium	10	7	ppm
ppm - parts per million		nd - none detected	

Table 1

Amendment Tracking

Issue Date: September 26, 2002
Amendment Date: September 28, 2002
Amendment: The results for this report were issued incorrectly. The information contained in this report has been corrected.

Respectfully submitted,
ARMSTRONG FORENSIC LABORATORY, INC.

Original Signed by:

Andrew T. Armstrong, PhD, CPC
Fellow, American Board of Criminalistics
AHA Accreditation Cert. No: 363
AHA ELLAP Accredited

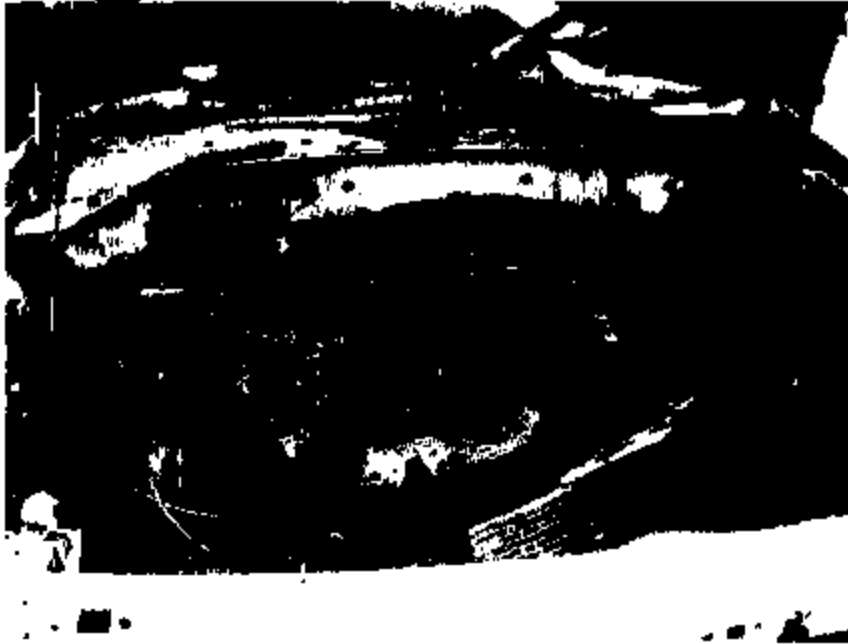
cc: Scottie Taylor, Greenville, TX
#A23470.doc



ER85-005-LC-5238



KR05-805-LC-2239



ER05-885-LC-5248



EMOS-803-LC-5241

FIRE INCIDENT REPORT

INVESTIGATOR: Scottie Taylor

CLAIM #: 172640-06

INSURED: [REDACTED]

DCM: S.Evans

OCCUPANT: n/a

CR: T.Gately

LOSS DATE/TIME: 9/3/02

EXAM DATE: 9/10/02

LOSS DESCRIPTION: 2002 Ford F-150 F/U, Vin # 1FTRP17L32N [REDACTED]

INITIAL MATERIAL IGNITED: Fuel

IGNITION SOURCE: Undetermined

CAUSE: ACCIDENTAL NATURAL INCENDIARY UNKNOWN

DATE/METHOD REPORTED TO TDI: n/a

SUBRO POTENTIAL YES NO GPS LONG/LAT: N 35 13.38 / N 101 45.53

INSURED INVOLVEMENT YES NO

INVESTIGATIVE REFERRAL TO SIU FOR FURTHER INVESTIGATION: YES NO

PARTIES PRESENT DURING C/O: n/a

DATE: n/a

- 1.
- 2.
- 3.

INTERVIEWS: YES NO

OWNER/S: Trace Hanna

RECORDED: NO

WITNESS #1

RECORDED:

WITNESS #2

RECORDED:

OTHER:

RECORDED:

DOCUMENTS OBTAINED: FIRE REPORT FIRE INV. REPORT POLICE REPORT OTHER

PHOTOGRAPHS: DIGITAL 35MM OTHER

FILM PROCESSED: YES NO

EVIDENCE RECOVERED: YES NO

SAMPLES SENT TO LAB: YES NO

TRANSMITTED VIA: UPS

LAB NAME: Armstrongs Forensic Laboratory

UTILITIES: ELECTRIC WATER NAT. GAS LPG

METER/S PRESENT: YES NO

OUTSIDE EXPERT USED: YES NO NAME/PHONE:

COMMENTS: The fire was contained to the engine compartment. Heavy fire damage was noted to the engine hood and the top side of the engine. The vehicle was three months old and had approx. 4200 miles on it. O/I was getting onto Interstate 27 when he heard a pop noise, then someone pulled up beside him and yelled his vehicle was on fire. The fire was fuel related. By the time O/I pulled over the engine compartment was on fire.

VERBAL REPORT DATE: 9/10/02

TIME: 11:00 AM

TO WHOM: T Gately V/M

DATE REPORT SENT TO DCM: 9/11/02

MAIL E-MAIL

DATE REPORT SENT TO (S)CR: 9/11/02

MAIL E-MAIL

DATE REPORT SENT TO SIU MANAGER 9/11/02

MAIL E-MAIL

ATTACHMENTS NOT LISTED ABOVE: recall info, field notes, photo log

SIGNATURE OF SIU INVESTIGATOR: Scottie Taylor CFI

DATE: 9/11/02

PLEASE READ INSTRUCTIONS ON REVERSE SIDE

LOCATION	PLACE WHERE ACCIDENT OCCURRED	COUNTY <u>Randall</u>	CITY OR TOWN <u>Amarillo</u>	DO NOT WRITE IN THIS SPACE	
	IF ACCIDENT WAS OUTSIDE CITY LIMITS, INDICATE DISTANCE FROM NEAREST TOWN	<u>1.3</u> MILES	<input type="checkbox"/> NORTH <input checked="" type="checkbox"/> EAST <input type="checkbox"/> WEST <input type="checkbox"/> SOUTH		OF ROAD <u>Amarillo</u>
	ROAD OR TRUCK ACCIDENT OCCURRED	<u>I-27 Northbound</u>	ROAD NUMBER		TYPE OF ROAD
TIME	DATE OF ACCIDENT	<u>9-3-02</u>	DAY OF WEEK <u>Tuesday</u>	TIME <u>7:30</u>	
	<input type="checkbox"/> AM <input type="checkbox"/> PM <input type="checkbox"/> NIGHT <input type="checkbox"/> DAY <input type="checkbox"/> NIGHT				

VEHICLES	YOUR VEHICLE			
	YEAR MODEL	<u>2002 Ford</u>	TYPE OF VEHICLE	<u>F150</u>
	OWNER'S NAME	<u>Trace Hanna</u>	OWNER'S LICENSE	<u>M</u>
OTHER VEHICLES	OTHER UNIT - OTHER VEHICLE, TRAILER, POWERED CYCLES, ETC. - INDICATE WHICH COMPLETE INFORMATION AND MAKE AVAILABLE - IF UNKNOWN, MARK "NOT KNOWN"			
	YEAR MODEL		TYPE OF VEHICLE	
	OWNER'S NAME		OWNER'S LICENSE	

DAMAGE TO PROPERTY OTHER THAN VEHICLES	<u>?</u>	APPROXIMATE COST TO REPAIR OR REPLACE	<u>TOTAL</u>
--	----------	---------------------------------------	--------------

CASUALTIES	NO. 1 (PRINT ONLY FURNISHED ON PERSONS DAMAGED BY YOUR VEHICLE)				<input type="checkbox"/> DRIVER <input type="checkbox"/> FRONT SEAT PASSENGER <input type="checkbox"/> REAR SEAT PASSENGER <input type="checkbox"/> PEDESTRIAN <input type="checkbox"/> LEFT SIDE <input type="checkbox"/> RIGHT SIDE
	NAME	ADDRESS	DATE OF BIRTH	WAS PERSON KILLED?	
	AGE	SEX	RACE		
	DEGREE OF INJURY				
CASUALTIES	NO. 2				<input type="checkbox"/> DRIVER <input type="checkbox"/> FRONT SEAT PASSENGER <input type="checkbox"/> REAR SEAT PASSENGER <input type="checkbox"/> PEDESTRIAN <input type="checkbox"/> LEFT SIDE <input type="checkbox"/> RIGHT SIDE
	NAME	ADDRESS	DATE OF BIRTH	WAS PERSON KILLED?	
	AGE	SEX	RACE		
	DEGREE OF INJURY				

STATE BRIEFLY WHAT HAPPENED BY SPACE IS NEARFOUNT CONTINUE ON REVERSE PAGE

Driving down Interstate, heard loud pop, Truck caught on fire - engulfed in flames.

DRIVER'S SIGNATURE _____ DATE OF REPORT _____

FIELD NOTES

CLAIM NO. [REDACTED]

DATE OF LOSS: September 3, 2002
TIME OF LOSS: 7:15 P.M.
DATE OF EXAMINATION: September 10, 2002
TODAYS' DATE: September 10, 2002

The vehicle was examined at Secure Towing, at 7301 Amarillo Boulevard in Amarillo, Texas. The vehicle is a short wheel base single cab pickup. The year model is 2002, the make is a Ford and the model is an F150. The vehicle is light gray in color on both the top and bottom. The license plate on this vehicle is 5WV53. This is a Texas license plate. The VIN is 1FTRF17L32N [REDACTED]

Inspection of the passenger compartment and the dash area revealed fire damage to the top of the dash area. Heat appears to have radiated through the windshield. The vehicle has a stereo in it, an AM/FM cassette. The vehicle has two speakers in the doors and two behind the seats. The fire did not breach the fire wall. The ignition is intact, and the steering column intact as well. The steering wheel is locked at this time. The vehicle front seats are intact with no fire damage, except for smoke damage. Air bags on both sides are in place and were not deployed. The ignition keys are with the wrecker service at this time. I was unable to get the odometer, since this vehicle has a digital odometer. The battery was consumed in this vehicle, along with the electrical system. The vehicle still has some personal items inside, such as sunglasses and a few items in the console. There is a nylon lunch container and a few papers in the glove box. It appears most items have been cleaned out of the passenger compartment.

Inspection of the owner's manual reveals the vehicle was purchased at Gene Messer, located at 1400 South Soncy in Amarillo, Texas 79119. The phone number is (806) 355-7471.

Inspection of the fuse block on the driver's side of the dash area revealed fuse #5 was blown. This is for speed control module, reverse lamps, climate mode switch, daytime running lamp relay, digital transmission range, DTR sensor. This was a 15 amp fuse. Fuse 14 amp was found blown. This was a 15 amp fuse, which goes to the battery saber relay and interior lamp relay. Fuse 11 was found blown. This is a 20 amp fuse which goes to the stop lamp switch as well as the turn and hazard flashers. Fuse 23 was found blown. This is a 10 amp fuse which goes to the trailer

low, battery charger relay, turn and hazard flasher, 4x4 sensors, 4x4 relay, overhead console, 4 wheel drive and anti-lock brake system module, EC mera and heated seat. Fuse 10 is a 30 amp fuse which goes to the passive anti-theft transceiver cluster, ignition control, power train control module relay, coil on plugs, radio noise, classiter SCC dowl.

Additional information on the passenger compartment, very minor damage done to the passenger compartment. The heaviest damage is to the top of the dash and to the windshield area. Harnesses are intact underneath the dash. You can see up under the dash that they are intact.

Inspection of the engine compartment revealed the hood to be pretty well melted away. Access to the engine compartment was very easy. The engine was heavily fire damaged. Most of the fire damage was on the top side of the engine and to the rear of the engine compartment. There was one battery in the vehicle, which was heavily fire damaged. The radiator was heavily damaged on the right passenger side of the radiator. The main load center, located on the left fender, is on the driver's side of the engine compartment. This was heavily damaged, so inspection of the fuses could not be completed. Inspection of the engine oil revealed there was engine oil, it was light brown to dark black. Inspection of the transmission oil revealed there was transmission oil, which was a red color. Radiator fluid had been drained by the fire. Brake oil had been drained by the fire, as had the power steering fluid. All belts were consumed by the fire. The upper hose was partially consumed and the lower hose was entirely consumed by the fire. This vehicle had a V8 gasoline engine, but it is unknown if there was an anti-theft system on the vehicle at the time of the fire. The front tire was P275/60/R17. These were custom wheels. Tire wear on the left front was 10/32. There were five lugnuts and none were missing. The left rear tire size was P275/60/R17. It was a custom wheel. The tire wear was 11/32nd. There were five lugnuts and none were missing. The right front tire was a P275/60/R17. Tire wear was 9/32nd. There were five lugnuts and none were missing. This was a custom wheel also. The right rear tire was a P275/60/R17. Tire wear was 11/32nd. There were five lugnuts and none were missing. All tires were B.F. Goodrich, radial long trailer T/A. The door lock cylinders were not damaged by the fire. The vehicle had electric locks, electric windows and electric mirrors. The bed of the truck was not damaged by the fire, and there are very few scratches in the bed. No contents were noted in the bed, other than content on the ground at the time of the fire, pieces of the burned truck. There was fire damage to the electrical system in the rear of the truck, and no evidence of

malfunction. The vehicle had a spare tire intact under the bed of the truck. Tire changing equipment was in place. The windshield was heavily damaged, and the lower middle section of the windshield of the driver's window was in the down position. It was not damaged. The rear window was not damaged. It was a sliding glass window. The passenger window was in the down position and was not damaged.

Inspection of the fuel tank revealed it to be in place with no fire damage. Inspection of the fuel cap revealed it to be in place. The fuel pipe was also in place. Transmission was intact with some minor external damage. No leaks were noted. The oil pan was intact and no leaks were noted.

Inspection of the underside of the vehicle revealed very minor damage except for an area of the engine compartment. There was moderate to heavy damage in this area. Damage to the vehicle front bumper was consumed by the fire. The hood was partially consumed. The grill was consumed. The driver's door had no damage. The left front fender was oxidized and heavily damaged. The right quarter panel had no damage. The tail gate had no fire damage, nor did the rear bumper. The right quarter panel had no damage noted, nor did the right passenger door. The right front fender was oxidized and most of the paint burned off. Body condition at the time of the fire appeared to be in excellent condition. There was no mechanical damage to the vehicle.

The evidence taken was an engine oil sample and a transmission oil sample. Both were submitted to Armstrong Forensic Laboratory in Arlington, Texas.

The fire origin appeared to be on the top side of the engine, towards the bulkhead area. There was very heavy damage to the hood, and no evidence of a malfunction in the electrical wiring or harnesses. The rear of the hood was consumed in the middle area. Almost all fire damage is to the engine compartment of the vehicle.

172540
Field Notes
ST/ca

Edward E. Anderson, Ph.D.
4008 87th Street
Lubbock, TX 79423
(806)794-1808

ENGINEERING REPORT

Date: January 14, 2003

Case: 2002 Ford F-150 Pickup Fire
[REDACTED]

Client: Simnacher Law Offices, Eroy Simnacher, Attorney

inspections and tests performed: Reviewed provided photographs and field notes for Claim 172640-02

Summary: The photographs indicate that the fire was driven by a massive failure of the fuel system in the vicinity of the fuel injectors, fuel distribution manifold, fuel supply line, fuel pressure regulator, and fuel return line. These parts are distributed across the top of the engine about the throttle body. Melting or burning in the fire basically destroyed the individual parts. Hence, it is not possible to determine exactly how the fire was initiated, but there are several metallic, plastic and elastomer connections in this area where fuel leaks could occur.

This particular vehicle is fairly new, less than 1 year old, and probably still under warranty although I do not know the exact mileage on the vehicle. Thus, one would not expect any fuel leaks to occur unless (a) a mistake were made during manufacturing, (b) a fuel leakage test or inspection was not performed before customer or dealer acceptance, (c) the owner tampered with or repaired the fuel system after accepting the vehicle, or (d) improper maintenance was performed upon the fuel system after the owner accepted the vehicle. As option (c) above is highly unlikely since the vehicle was probably still under warranty, I can only conclude that there was a failure on the part of the vehicle manufacturer or subsequent authorized maintenance agent to provide a safe and serviceable vehicle to the owner.

Recommendations: None.

Report: There are a number of fuel distribution parts located across the top of the engine. Elastomer and plastic parts like o-rings, flexible hoses, and plastic clips join these to one another. The failure of any one of these will result in a fuel leak which when exposed to an ignition source, like the hot exhaust manifold will initiate a fire. The fuel distribution system across the top of the engine also contains about 1/3 - 1/2 pint of fuel that is under pressure. Thus, once the fire is initiated, there is a considerable source of fuel available to continue to feed the fire even if the electrical system is deactivated or terminated by the fire.

The chain of events that resulted in the final damage observed in the provided photographs was most likely (a) a small fuel leak occurred somewhere in the upper fuel distribution or injection system, (b) this small fire began to act upon other elements in the distribution system causing them to fail either by fire consumption or melting thereby adding more fuel to the fire and enlarging the fire, (c) the fuel pump now continues to

pump fuel from the gas tank onto the fire until either the ignition switch is turned off or the electrical system fails, and (d) the fire is now out of control as the flames proceed to exit from under the hood through the vents in front of the windshield and back through the condenser and radiator.

Once the fire had become established and fuel was being added to the fire by the leaked fuel distribution, it began to consume other fuels under the hood, like wiring insulation, plastic air filter and distribution parts, plastic fan blades, plastic battery boxes, and several others seen (or not seen) in the provided photographs. Electrical short circuits began to take place once the fire had removed the wiring electrical insulation, assuming that the ignition or some other switch had not deactivated the circuits. The number of blown fuses reported in the provided field notes suggest that the ignition switch was not turned off until the fire disabled the electrical system by electrical shorts or burning of the battery housing. This implies that the fuel pump stayed active for some extended time after the fire was inflated and out of control, thereby continuing to add fuel to the fire.

Finally, this is a very new vehicle since the accident occurred during the vehicle's model year. I suspect that it is still under warranty, although this is not clear from the field notes or other provided information. The manufacturer and its agents should still be responsible for the safe operation of the vehicle.

RECORDED STATEMENT

This is Paul Geddes speaking. I'm calling from Albany, NY. My telephone number is 518-464-3254. I'm speaking to [REDACTED] at telephone number [REDACTED]. We're discussing an incident that occurred on February 6, 2004 in the City and State of Brooklyn, NY. Today's date is February 10, 2004. The time is approximately 10:55 am Eastern Standard Time.

Q. [REDACTED] do you realize that I'm recording your interview?

A. That's right.

Q. And I have your permission to record this interview?

A. That's right.

Q. Okay. Please state your full name and spell your last name?

A. [REDACTED]

Q. Okay. And what is your address?

A. [REDACTED] Brooklyn, NY zip code [REDACTED]

Q. Okay. And how long have you resided there?

A. Well, about 50 years.

Q. 50 years?

A. Yeah. It's been in the family the house, home.

Q. So you inherited it and everything?

A. Right.

Q. Okay. And are you currently under the influence of any drugs or alcohol?

A. No. You (inaudible) park and drive.

Q. All right. Please say your full date of birth please?

A. [REDACTED]

Q. And where were you born?

A. Brooklyn.

Q. New York?

A. Yes. Right.

Q. Do you have a valid driver's license?

A. Yes. Right.

Q. All right. State issued license?

A. That's right.

Q. New York state?

A. New York state.

Q. Your driver's license ID number?

A. [REDACTED]

Q. All right. And are there any restrictions on your driving license?

A. No. No restrictions at all.

Q. All right. What is your Social Security Number?

A. [REDACTED]

Q. Okay. And from what state did you obtain your Social Security card from?

A. New York.

Q. Okay. Are you married?

A. Yes.

Q. All right. Your wife's name?

A. Virginia.

Q. And her date of birth please?

A. [REDACTED]

Q. Okay. And how long have you been married?

A. About 30 years. (Inaudible) me that. 35 years.

Q. Okay. And do you have any children?

A. Yes.

Q. How many?

A. 4.

Q. Name and ages?

A. [REDACTED]

Q. Okay. Do they live with you?

A. No.

Q. And what is your occupation?

A. I'm retired United Parcel driver.

Q. Okay. Retired United States Postal Service?

A. Yeah. UPS. UPS.

Q. Oh, UPS.

A. The brown truck. Not (inaudible). United Parcel.

Q. Okay. All right. And how many years have you been retired?

A. Let's see about 10.

Q. 10 years?

A. Right.

- Q. All right. And what is your weekly earnings?
- A. I'm not, (inaudible).
- Q. (Inaudible).
- A. Well I get Social Security.
- Q. Pension?
- A. Yeah and pension.
- Q. What would you say your monthly income is then?
- A. About \$2000 something like that. About \$2,000.
- Q. Okay. Is that with SS included?
- A. Excuse me?
- Q. Is that with Social Security included?
- A. Yeah, that's right.
- Q. And does your wife work at all?
- A. No.
- Q. Okay. Does she receive Social Security or pension?
- A. Yes.
- Q. And her take home pay approximately a month?
- A. \$15, \$12, \$15.
- Q. Okay. As for the home you live in, you own your home?
- A. Yes. Yes.
- Q. Do you have to pay a mortgage or rent payment?
- A. No, just taxes and that's it. (Inaudible) my brother and sister a brownstone in Brooklyn.

- Q. Okay. And what would you say your average bills are for taxes and cable, electric? What's the output?
- A. Let's see, maybe about (inaudible).
- Q. All right. And do you have any credit cards?
- A. Yes.
- Q. What type of credit cards do you own?
- A. I just have the one VISA.
- Q. Okay. Do you have any balance on the?
- A. Excuse me?
- Q. Do you have any balance on the VISA?
- A. No, no, it's paid up.
- Q. All right. Just one card, okay.
- A. Just one card.
- Q. As for car payments, do you have any car payments at this time?
- A. No.
- Q. So you have no loans against your vehicle?
- A. No.
- Q. Okay. Have you ever declared bankruptcy, you or your wife?
- A. No.
- Q. All right. And as for the vehicle when it was caught on fire, can you tell me the exact location where the vehicle?
- A. Well, it was on (Inaudible) in Brooklyn between Hamilton Avenue and Atlantic Avenue.
- Q. Okay. Was the vehicle running at the time of the fire?

- A. Yes, yes, I was driving it.
- Q. All right. How did you know it was on fire?
- A. Well, the smoke, I saw it coming from under the hood.
- Q. All right. And what was the date of the fire?
- A. Friday, the 6th.
- Q. Okay. What is the year, make and model of your vehicle?
- A. 97 Ford Expedition.
- Q. Color?
- A. Black.
- Q. Do you know the license plate off your vehicle?
- A. Wait a second till I get that. (Inaudible). Just a second.
- Q. If you don't know it that's fine.
- A. Let's see. License number it's got here. [REDACTED] I don't think that's it. But I got it off the sheet here.
- Q. Okay. That's for the, when did you buy your vehicle?
- A. Uh, about 4 years ago. Leased. I bought it last year.
- Q. You bought it last year?
- A. Yeah.
- Q. Okay. And what was the name of the dealership you bought it from?
- A. Heck, it was in Long Island City. What the heck is it? I don't have it here. I'll have to get you that information. I don't have all the papers here to access it.
- Q. And as for the purchase price, what did you pay for your vehicle?

- A. I would, I don't have all these papers with me. I'm not at a house now. I have to, you know, I'll have to get you all that information. I call you back on that, all right.
- Q. Yeah, that's all right. Did you finance your vehicle at all?
- A. Excuse me?
- Q. Did you have to finance your vehicle at all?
- A. Excuse me?
- Q. Did you have your vehicle financed?
- A. Yeah. It was from (inaudible).
- Q. Okay. And one year ago you had it on a loan?
- A. Yes. Right.
- Q. You paid it off in a year?
- A. Yeah.
- Q. All right. And how long did you finance the vehicle for? One year.
- A. Yes. I think it was one year, right.
- Q. Okay. And how long have you owned the vehicle?
- A. Uh, about 5 years I think.
- Q. 5 years?
- A. Yeah. I think it was five or six years. I, my daughter handles this stuff for me. That's why I don't have all the papers. She done the whole thing on this (inaudible).
- Q. Did you recently have any current maintenance work done on the vehicle before the fire occurred?
- A. No. No.

- Q. Okay. So nothing major done to the vehicle before the fire occurred?
- A. No.
- Q. And as for the incident, who put out the fire?
- A. The tow truck guy. He came over, when I pulled up the hood, he was there and he came over and helped me.
- Q. Fire extinguisher used?
- A. Yeah. (Inaudible).
- Q. All right. Did the, did you know where the fire occurred?
- A. Well, (Inaudible) I get off at Atlantic Avenue. I pulled to the side there on the exit where I got off. And then I pull (inaudible) right at Atlantic Avenue in Brooklyn. At the exit.
- Q. Block the exit. All right. Have you recently tried to sell your vehicle at all?
- A. No. No.
- Q. And who does basic routine maintenance on your vehicle?
- A. I just take it to one of the you know, one of the local Mobil Station.
- Q. In your area? Do you know the name of the place?
- A. The Mobil right on (inaudible) near my house.
- Q. Dean? Okay. And do you have any documents related to your vehicle such as payment books and receipts?
- A. My daughter has all of that. She does all my book work and I can get all of that stuff from her.
- Q. Okay. Did you realize I recorded your interview with you?
- A. Yes. Yes. Right.
- Q. And did I have you permissions to record the interview?

Recorded Statement of [REDACTED]
June 18, 2004
Page 9

A. Yes.

Q. All right. With your permission, I'd like to stop the recorder?

A. Yes. Okay.

Q. Thank you.

Transcribed by: KMM Typing Services, Inc./pae
Date: 6/18/04



RECOVERY DIVISION

American International Companies®

Services Provided by a Member of American International Group, Inc.

May 19, 2004

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

Attention : SHAWN NORTON

RECEIVED MAY 24 2004

Re: Our Insured	:	[REDACTED]
Our File No.	:	000488 - 000004030938
Your File No.	:	
Your Insured	:	FORD MOTOR COMPANY
Date of Loss	:	February 06, 2004
Damages	:	\$12,760.32

Dear FORD:

We are the recovery agents for INS CO OF THE STATE OF PENN who have made payment to their policyholder for damages arising out of the above cited occurrence. Our investigation of this loss has determined that your insured is responsible for these damages.

Since our client is the equitable subrogee of its insured, on their behalf, we request payment of the above captioned damages.

Please note our file number on your remittance and send your check made payable to INS CO OF THE STATE OF PENN in the enclosed envelope.

Please note that at your request, we have sent the original color photographs of our insured's vehicle and will require that they be returned to us at the conclusion of this matter.

If you have any questions, please feel free to contact me at 800-748-2069 X3031 or use toll-free telephone number listed above.

Sincerely,

Robert Coughlin
ROBERT COUGHLIN
RECOVERY AGENT

- \$12,760.32
- 70,221 (M)



Custard Insurance Adjusters, Inc.

March 16, 2004

AKG Claim Services
120 Great Oaks Office Park, 2nd Floor
Albany, NY 12203

ADDRESS REPLY TO:

40 Sunset Ridge
Suite 240
New Paltz, NY 12561
Tel: 845-255-9797
Fax: 845-255-9029
E-mail: newpaltz.ny@custard.com

ATTENTION: Paul Geddes

Your File/Claim #: [REDACTED]
Your Insured: [REDACTED]
Date of Loss: 02/06/2004
Our File #: 178-001044

FIRST AND FINAL REPORT

ENCLOSURES:

1. The National Highway Transportation Safety Administration reports regarding complaints, defect investigation and safety recalls, regarding this vehicle
3. Photographs of the vehicle in question & a Exemplar vehicle

ASSIGNMENT:

Assignment was received on 3/2/2004. We had been requested to complete an Origin and Cause investigation into the facts of this incident.

DESCRIPTION OF INCIDENT:

It is claimed that the vehicle in question had caught fire during operation.

DATE, TIME AND PLACE:

The incident occurred on 2/6/2004 between 4:00 p.m. and 6:00 p.m. at the Atlantic Avenue underpass in Brooklyn, New York.

INSURED:

Insured is [REDACTED]. He can be reached at telephone number [REDACTED] which also seems to be the cell phone number for his son [REDACTED] or a [REDACTED].

CORPORATE OFFICE
Atlanta, Georgia • (770) 263-6800 • FAX (770) 368-3375
24 Hour HOTLINE (800) 457-3390

NATIONWIDE SERVICES SINCE 1962 • WORLDWIDE REPRESENTATION THROUGH AFFILIATES

EP85-685-LC-5258

Page 2
March 16, 2004
CIA File #: 178-001044
Your File #: 04030938

On March 5, 2004, at 11:39 a.m., we placed a call to [REDACTED] son, [REDACTED] who indicated that the vehicle was not in for any service, however, did have some basic front-end work done by Seca Mechanical on Atlantic in early January.

He states that there were after market parts used on the vehicle inclusive of tie rods. There was no body damage prior to the fire and no after market equipment such as rims, radio, TV etc.

The vehicle had 78,000 miles on it when it had been bought out from a lease and there is \$11,300.00 owed on the vehicle. The lease was up in August of 2003. It was originally leased in 1997.

[REDACTED] had stated that his father was alone driving the vehicle in question when he noticed smoke; he popped open the hood and there was a fire. He pulled under the over pass and a tow truck guy had come along to put out the fire. He said the incident happened between 4:00 and 6:00 p.m. No police or Fire Department were called to the scene.

On 3/8/2004, at 10:48 a.m. [REDACTED] contacted us [REDACTED] stated that he was driving the vehicle when he noticed smoke coming from the hood. He pulled off at Atlantic Avenue and noticed the fire in front of the vehicle. He states that a tow truck had stopped and the driver had put out the fire.

He states that it was raining that day so he had the lights and the wipers on and the radio was off. The wipers were working at the time of the incident.

He further states that no electrical work had been done to the vehicle and front-end work was done in January. He states that he was driving less than an hour to The Home Depot in Red Hook and coming from his home.

VEHICLE INSPECTION:

On 3/8/2004 the undersigned had proceeded to the Copart Salvage Yard located at 1983 Montauk Highway, Brookhaven, New York and inspected the vehicle in question.

Upon our initial inspection of the exterior of the vehicle, it was noted that the body was in fairly good condition, however, there were some minor bumps and scratches along the front-end rear bumper.

Page 3
March 16, 2004
CIA File #: 178-001044
Your File #: 04030038

Some smoke damage was noted along the center area of the front windshield and heat damage was noted along the windshield area of the front hood towards the center of the hood. Three of the four tires were flat and the spare tire located underneath the rear compartment was missing.

Upon our inspection of the interior passenger compartment it was noted that the same was in poor condition. The carpets were soiled. There seemed to be some debris about the interior compartment and the leather seats were heavily worn.

Also noted was that the rear view mirror was removed from its original mount on the front windshield and the corresponding wire was dangling from the overhead liner area.

During our inspection of the compartment area, it was noted that there was a chemical extinguisher used in the area believed to be the fire area. The white powder residue was visible over some of the components of the engine.

Based on the melted components, combined with the damage to the engine compartment hood, it would appear that the origin of the fire was the ignition wiring harness and relays located at the area of the firewall in front of the front passenger compartment towards the center of the vehicle.

Further inspection of the components in that area had revealed melted wiring insulating jacket, as well as other rubber and plastic molding pieces in this general area.

There did not appear to be any other relevant fire damage to the vehicle except in the area noted.

An Exemplar vehicle was available in the area and the major components relevant to this matter have been photographed and those photos are enclosed for your further review.

PHOTOGRAPHS:

Photographs of the vehicle were obtained using a Cannon EOS Rebel XS utilizing a 35 to 80 mm zoom lens and employing a Konica VX200 Super 24 exposure color film.

ORIGIN:

It would appear that the origin of this fire is the engine compartment firewall in front of the passenger side, toward the center of the vehicle.

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March 16, 2004
CIA File #: 178-001044
Your File #: 04030938

CAUSE:

Given the circumstances, the undersigned was unable to completely inspect the vehicle due to its location and lack of facilities available to complete the inspection.

It would appear that there was some sort of failure within the wiring harnesses and/or relays located in the area of the origin.

It is recommended, if the fire is of that value, that an electrical engineer inspect the wiring harnesses and relays located in the area of the origin.

REMARKS:

At this juncture it appears that our assignment has been completed; and we will now close our file.

Thank you for allowing us to assist you in this matter. We look forward to working with you in the future.

CUSTARD INSURANCE ADJUSTERS, INC.



Michael Canello
Certified Fire & Explosion Investigator

/mc

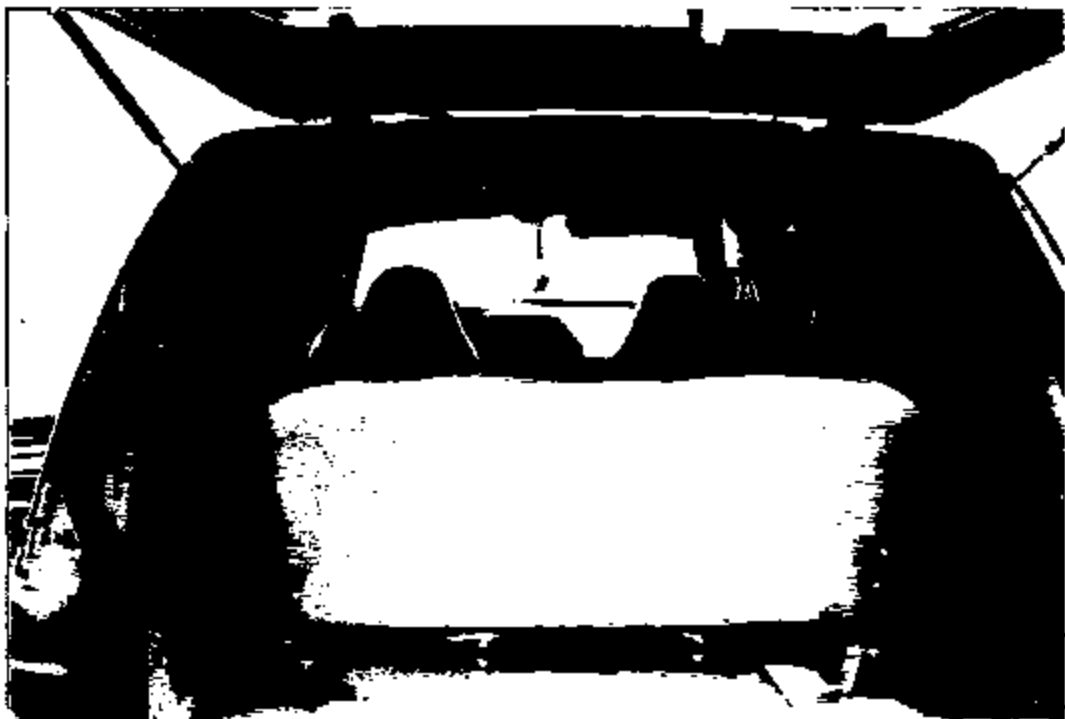


Photo #: 5 Date Taken: 3/9/04 Time: _____ By: MC

Passenger compartment from rear.

Description: _____



Photo #: 6 Date Taken: 3/9/04 Time: _____ By: MC

Front hood area at windshield.

Description: _____

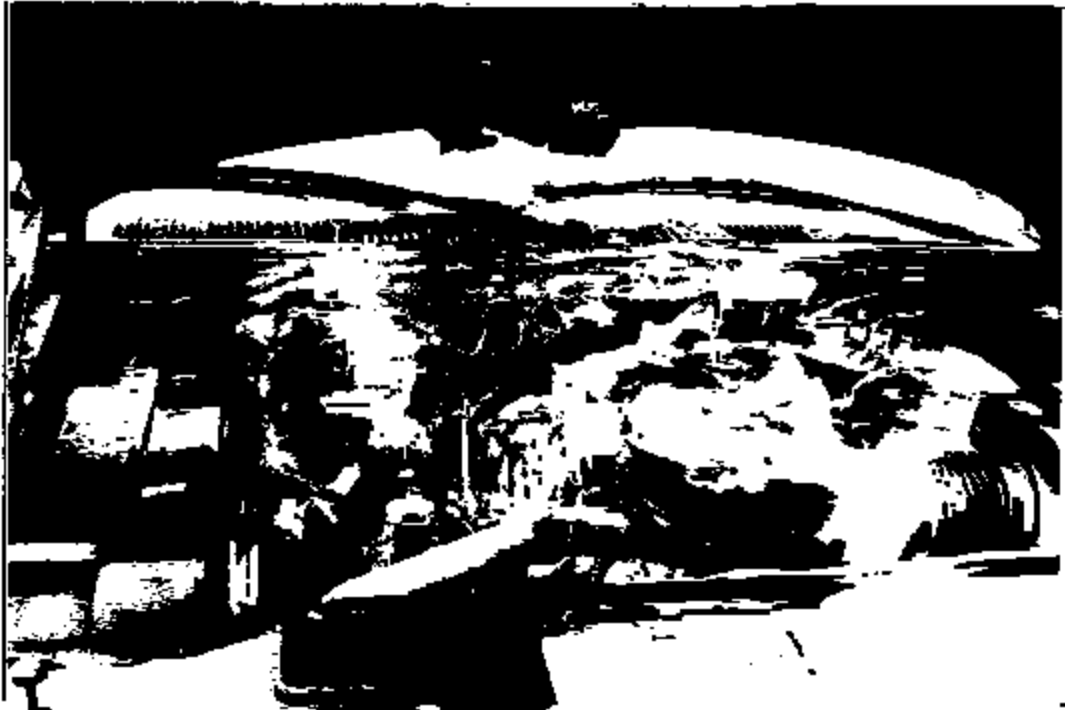


Photo #: 7 Date Taken: 3/8/04 Time: _____ By: MC

Engine compartment, area of origin.

Description: _____



Photo #: 8 Date Taken: 3/8/04 Time: _____ By: MC

Close up of above from passenger side.

Description: _____



Photo #: 9 Date Taken: 3/9/04 Time: _____ By: MC

Same as above along fire wall.

Description: _____



Photo #: 10 Date Taken: 3/9/04 Time: _____ By: MC

Area of fire wall along driver side.

Description: _____



Photo #: 11 Date Taken: 3/8/04 Time: By: MC

Alternator wires in fact.

Description:



Photo #: 12 Date Taken: 3/8/04 Time: By: MC

Engine compartment along fire wall in area of windshield wiper motor.

Description:



Photo #: 13 Date Taken: 3/8/04 Time: _____ By: MC

Windshield wiper motor.

Description: _____



Photo #: 14 Date Taken: 3/9/04 Time: _____ By: MC

VIN / Registration of exemplar vehicle.

Description: _____

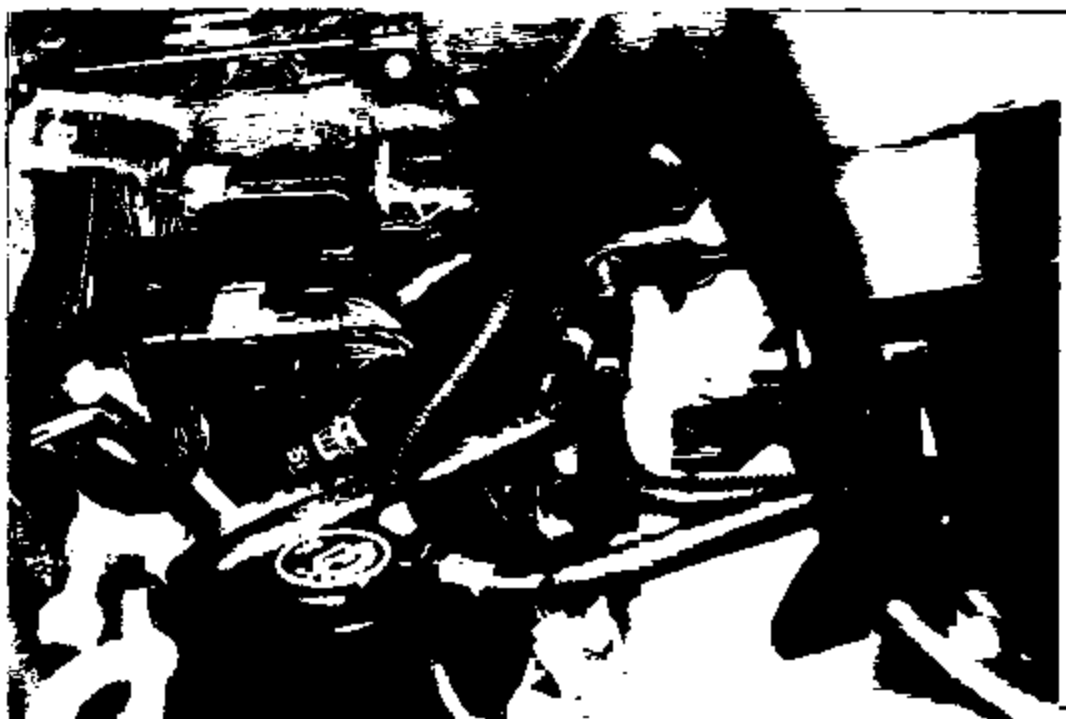


Photo #: 16 Date Taken: 3/9/04 Time: By: MC

Ignition wire and harness on exempter vehicle.

Description:

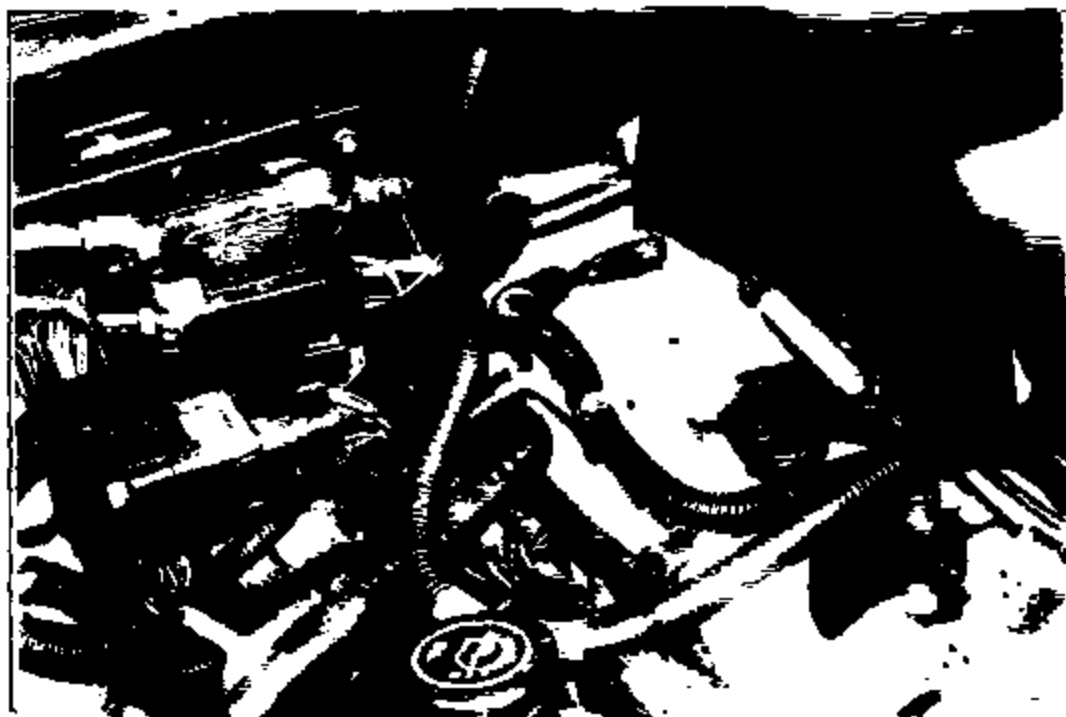


Photo #: 16 Date Taken: 3/9/04 Time: By: MC

Same as above.

Description:



Photo #: 17 Date Taken: 3/9/04 Time: _____ By: MC

ID / VIN of vehicle in question.

Description: _____

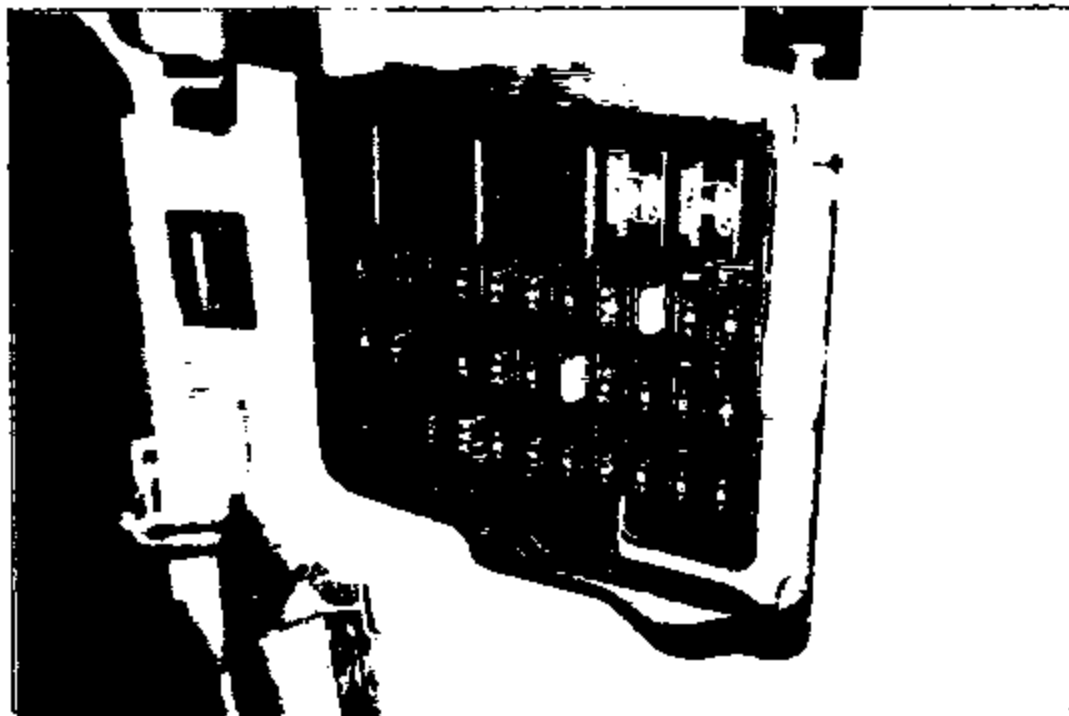
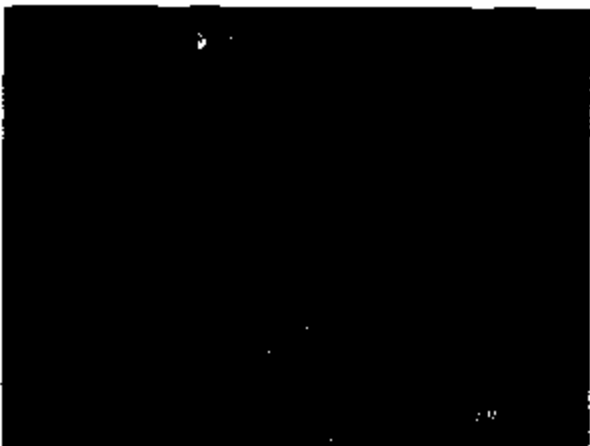


Photo #: 18 Date Taken: 3/9/04 Time: _____ By: MC

Fuse box of vehicle in question.

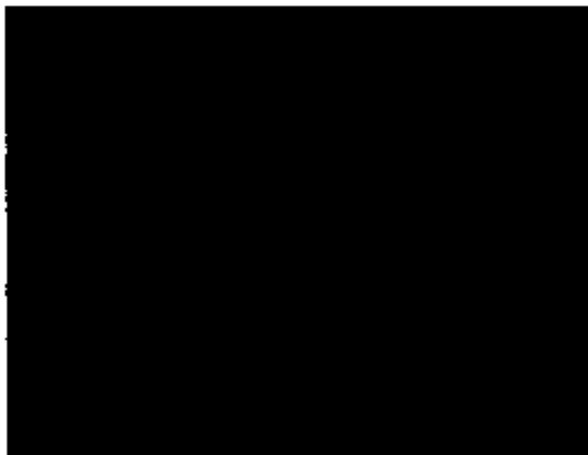
Description: _____

Claim Number: [REDACTED]

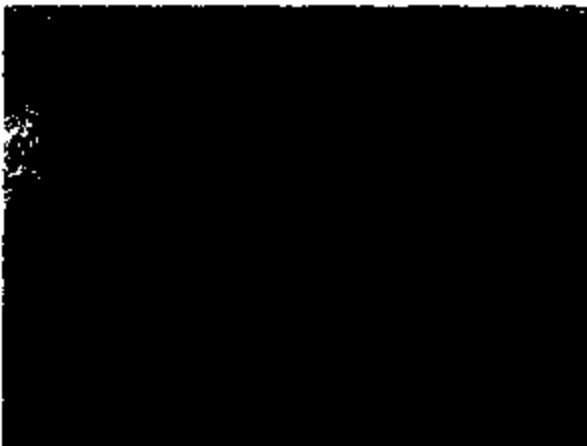
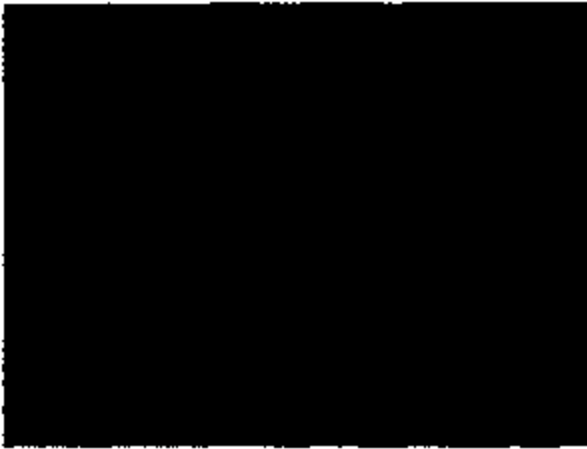


[REDACTED]

03/31/2004

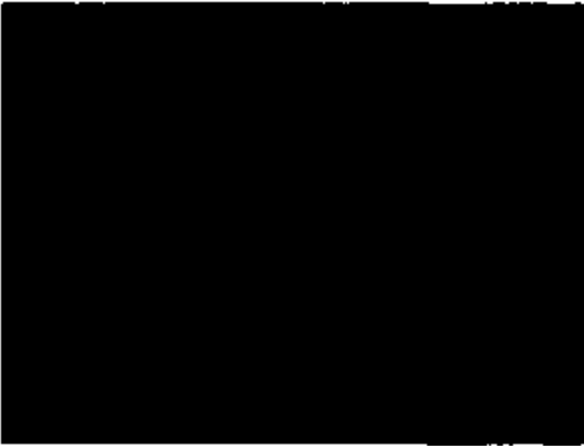


03/31/2004

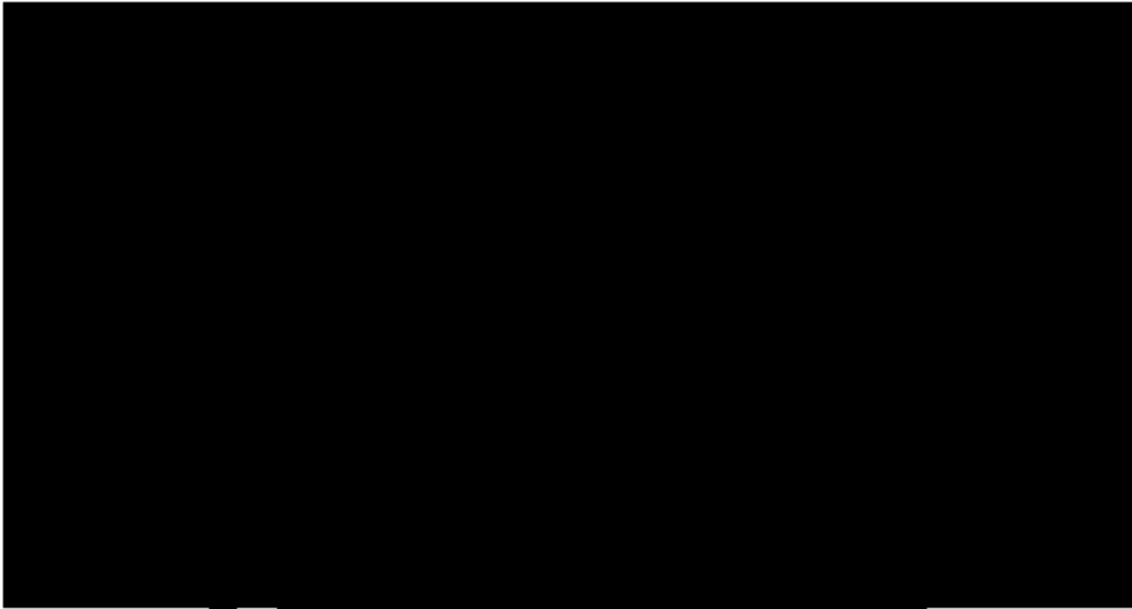


... 03/31/2004

EA05-005-LC-3272



03/31/2004



STATE OF TENNESSEE, COUNTY OF COCKE

To Any Lawful Officer to Execute and Return:

Summon Ford Motor Company

To appear before the General Sessions Court of Cocke County, Tennessee, on the 26th day of August, 2003, at 9:00 a.m./p.m., then and there to answer in a civil action brought by

[Redacted] For property damages in the amount of \$14,999.00 as the result of ~~acts and/or omissions of the defendant~~ and breach of warranties of the defendant which were the sole, direct and proximate cause of the loss sustained by the plaintiff, said loss occurring on or about May 16, 2002 in Cocke County, Tennessee.

Judgment for _____ against _____ for \$ _____ plus interest at the rate of _____ % and cost of suit, for which execution may issue.

Judgment entered by: Default Agreement Trial

Dismissed: Without prejudice With prejudice
Costs taxed to: Plaintiff Defendant
Defendant(s) _____
in court and admitted to jurisdiction of court.

This the _____ day of _____, 20____, _____, Judge, Div. _____

ORDER

This the ___ day of _____, 20____, _____ Judge

ERG5-885-LC-8274

NOTICE

TO THE DEFENDANT(S):
Tennessee law provides a four thousand dollar (\$4,000.00) personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the clerk of the court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed; these include items of necessary wearing apparel (clothing) for yourself and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible, and school books. Should any of these items be seized you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer.

AFFIDAVIT

To the best of my information and belief, after investigation of Defendant's employment, I hereby make affidavit that the Defendant is/is not a member of a military service.

Attorney for Plaintiff or Plaintiff

Notary Public
My Comm. Exp.: _____

Docket Number 7798

vs. Plaintiff(s)
Ford Motor Company
Parklane Towers West Defendant.
Suite 300
Three Parklane Boulevard Address
Dearborn, MI 48126
Defendant.

Address
Defendant.
[Signature]
Address

CIVIL WARRANT
Court of General Sessions
(preprinted name), Clerk

By [Signature] Deputy Clerk
Issued June 25, 2003
Set for August 26th at 9 AM
Rec'd for _____

Served Upon: All Named Defendants
 All Defendants Except:

SERVICE

Served _____, 20____

Sheriff/Constable (Process Server)

Steven C. Ross
Attorney for Plaintiff
Telephone 423/246-8176

Attorney for Defendant
Telephone _____

PAGE 01

SESSIONS COURT CLERK

423623988B

05/15/2003 08:02



ERIE INSURANCE GROUP

Branch Office - Colonnade Corporate Center • 2820 Electric Road, Suite 100 • P.O. Box 20789 • Roanoke, VA 24018-0524
(540) 880-8850 • Toll Free 1-800-533-3743 • Fax (540) 778-1234 • <http://www.erie-insurance.com>

JOHN R. ROBERTSON, AIC
Assistant Vice President and Branch Claims Manager

October 7, 2002

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

Re: ERIE Claim [REDACTED]
ERIE Insured: [REDACTED]
Date of Loss: 5/16/02

Dear Shawn:

I am in receipt of your letter, dated August 15, 2002, wherein you have asked for additional information. I am not able to provide everything that you have asked for, but I will give you the information that I can.

This incident occurred on May 16, 2002, at approximately 12:45 p.m. Our insured was on his way home from work at the time. He had only driven the vehicle for a short ways. I am unable to tell you how far, when he noticed the vehicle "miss," or jerking in the engine.

After driving for less than one-half mile, he heard a pop in the engine compartment. He then observed smoke coming from the hood area. He shut the vehicle off at that time and exited, and by the time he did this, smoke was coming from under the dash.

Our insured did not have any service records, although he advised the only work ever done was maintenance of the oil and filter changes. The vehicle was purchased used on or about July 5, 2001, from East Tennessee Nissan.

The vehicle had approximately 59,795 miles on it when it was purchased. The mileage at the time of the fire is unknown, as it was too badly burnt to read the odometer. I am unaware of any aftermarket additions or modifications that were made to the vehicle.

I have enclosed some photos that were taken by our cause and origin specialist and part of the report. However, because of the extensive damage done to this vehicle, I strongly urge you to have your own experts inspect this vehicle, which is being kept at Newport Raceway Auto & Truck Parts. You can call Drew or Linda at (423) 623-6039 for directions, etc.

As I stated in my letter, dated July 30, 2002, our total subrogation amount is \$14,897.50. I look forward to hearing from you in regard to this file.

Sincerely,
Karen K. Miller
Karen K. Miller, AIC
Subrogation Specialist
Roanoke Branch Claims
1-800-533-3743

KKM:pjs

- Enclosures:
1. Photographs
2. Report

- NO ESP 100W
269,000
2/27/02
NO Photos

Insured: [REDACTED]
File No.: 7282-0001913

1

ASSIGNMENT:

Received from: Richard Golf of Erie Insurance
Instructions: Conduct origin and cause investigation

Received on: Tuesday June 11, 2002
Commenced on: Tuesday June 11, 2002
Completed on: Friday June 28, 2002

Verbal report on: Wednesday June 12, 2002
Verbal report to: Nick Price, Erie Insurance SIU

RISK:

The insured is identified as [REDACTED] the owner of the vehicle.

This fire occurred in a 1999 Ford F-150 pick-up truck bearing a VIN of 1FT7E1821X [REDACTED]
The vehicle displayed a Tennessee disabled persons license plate number [REDACTED]

The vehicle was equipped with a V-8 cylinder engine and an automatic transmission.

Mileage and VIN number could not be verified due to the fire damage to the vehicle.

Tires, body condition, and fluid levels will be addressed as a part of the vehicle examination.

The insured stated that the vehicle had only received the regular maintenance of the oil and filter changes. The insured stated that the vehicle had a "miss" in the engine.

The insured stated that the vehicle had not been involved in any accidents.

A search of the National Highway Traffic Safety Administration database revealed one recall on the fuel injector electrical regulator and a technical service bulletin on the fuel pressure regulator. Copies of these reports are attached to this report.

CAUSE & ORIGIN SYNOPSIS:

This fire originated at the top right side of the engine in the area of the fuel rails. The first material ignited was the fuel from the fuel system. The source of ignition was either an electrical spark or the residual heat of the engine. The cause of this fire was a failure of the fuel delivery system within the fuel rail area.

INVESTIGATION:

On May 18, 2002, the insured started his vehicle as he was departing work. The insured drove the vehicle for a short distance and noticed a "miss" or jerking in the engine. After driving for less than one half of a mile, the insured heard a "pop" noise from the engine compartment. The insured then observed smoke coming from the hood area. The insured then shut off the truck and exited the vehicle, and by this time there was smoke coming from under the dash.

Insured: [REDACTED]
File No.: 7282-0001013

INTERVIEW - INSURED:

The insured [REDACTED] stated that he had not been having any problems with the truck other than a "miss" in the engine. He stated that the only service was for oil changes and filters.

[REDACTED] stated that at the time of the fire he had just departed work and was driving home. He stated that he had only traveled less than a half mile when there was a "miss" in the engine. He stated that he then heard a "pop", and smoke started coming from the engine compartment.

[REDACTED] stated that he stopped the car and as he was getting out, he noted that there was smoke coming from under the dash.

SUBROGATION ISSUES:

This fire was caused by a leak in the fuel delivery system. The contributing factor was a defect in the engine components supplying fuel to the engine.

A search of the NHTSA Office of Defects Investigation database revealed Recall #98V194000 for a 1999 Ford F150 regarding the fuel injection electrical regulator and a Technical Service Bulletin for the fuel pressure regulator, first and second stage. Copies of the recall and service bulletin are attached.

No evidence was removed from the vehicle.

FILE STATUS:

Having completed all elements of your original assignment, I am closing this file. However, should you determine that further investigative activity is warranted, it can easily be re-opened.

I have appreciated this opportunity to serve Erie Insurance.

Respectfully,

Ron Capehart
Certified Fire Investigator
Knoxville, Tennessee
(605) 966-8780

CC Mike Lane
Southeastern Regional Manager
478-862-7482

(Address all correspondence concerning this file to the following address. Please include the CIS file number.)

Crawford Investigation Services
National Operations Center
285 W. Esplanade Ave., Suite 300
Kenner, LA 70095



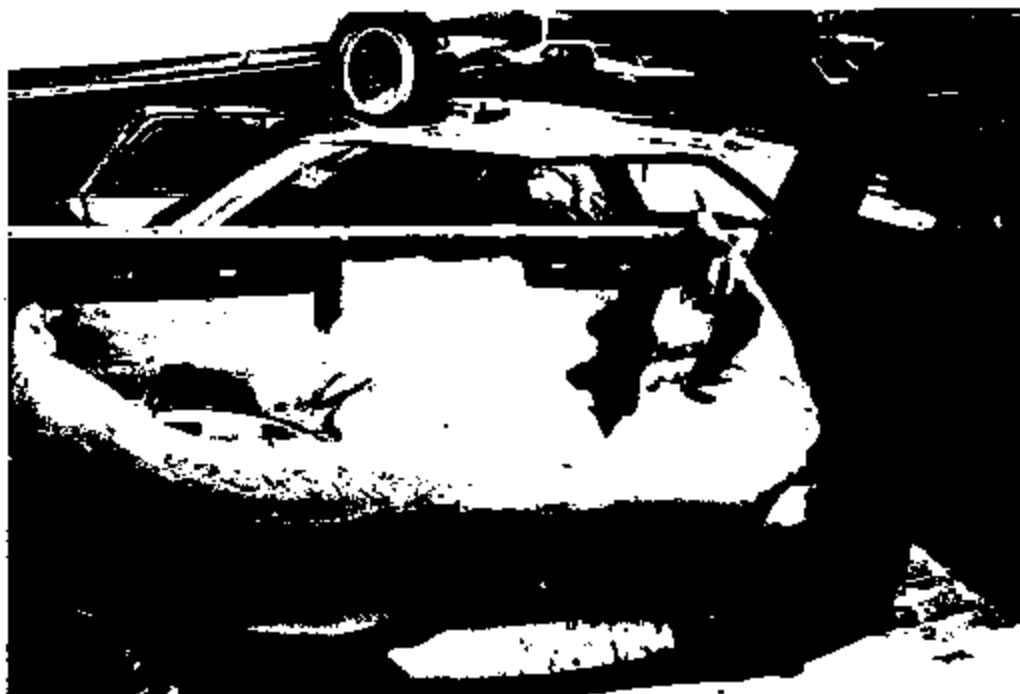
File Identification: 7282-001013

Insured [REDACTED]

Photo Mounting Sheet



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2.

Page 1



3

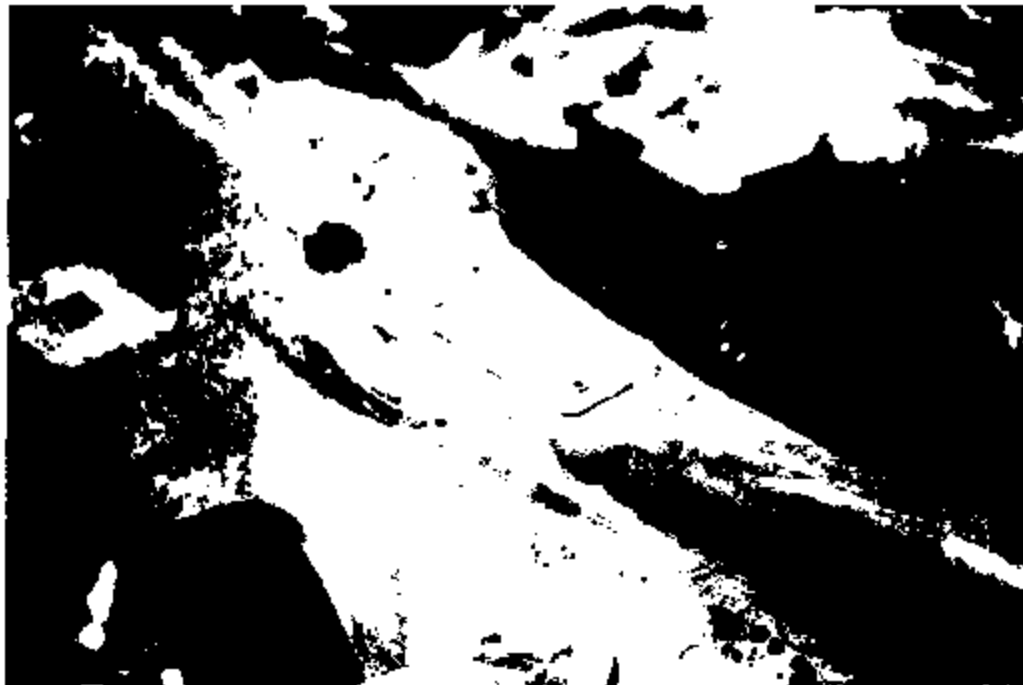


4

Photo Mounting Sheet



5.



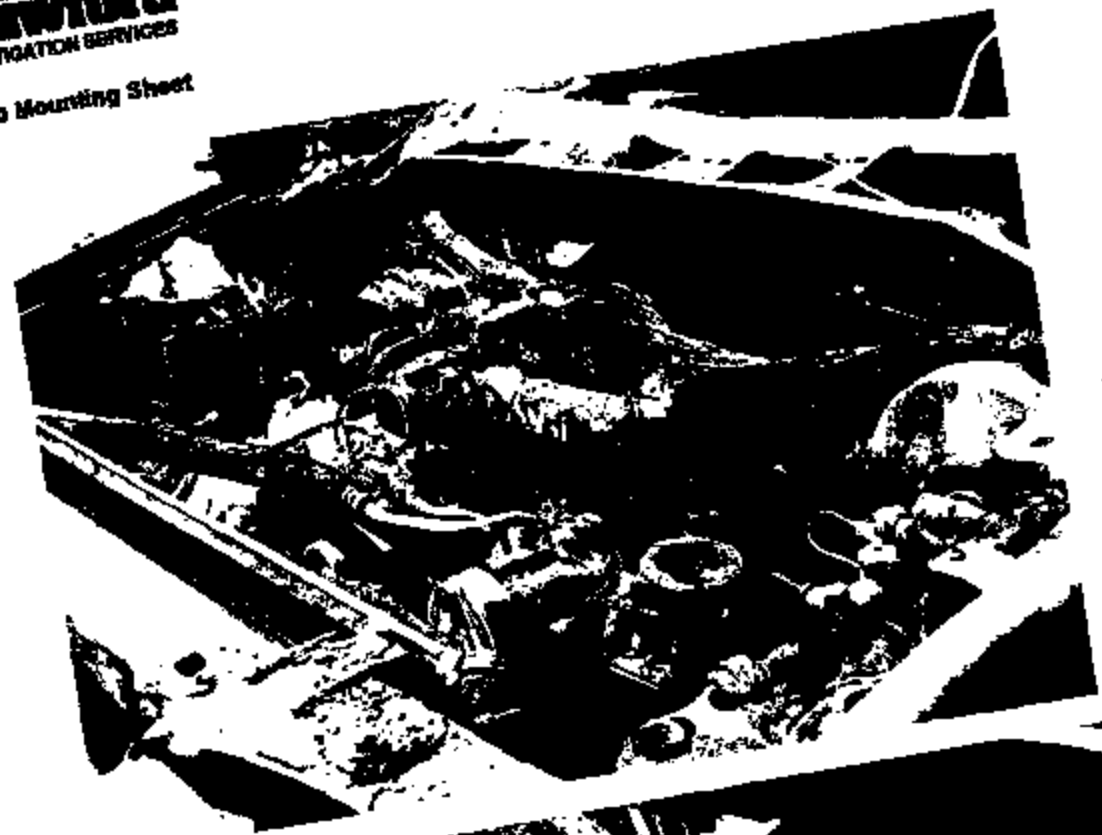
6.

File Identification: 7282-001013

Insure

Crawford
INVESTIGATION SERVICES

Photo Mounting Sheet

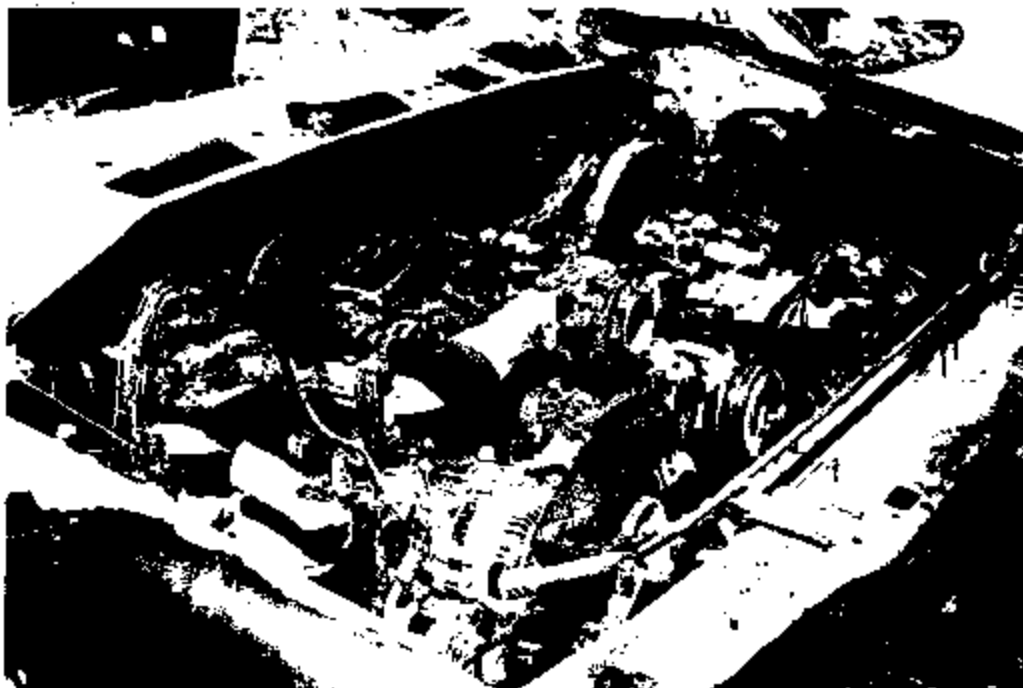


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ER65-00

Photo Mounting Sheet



9.

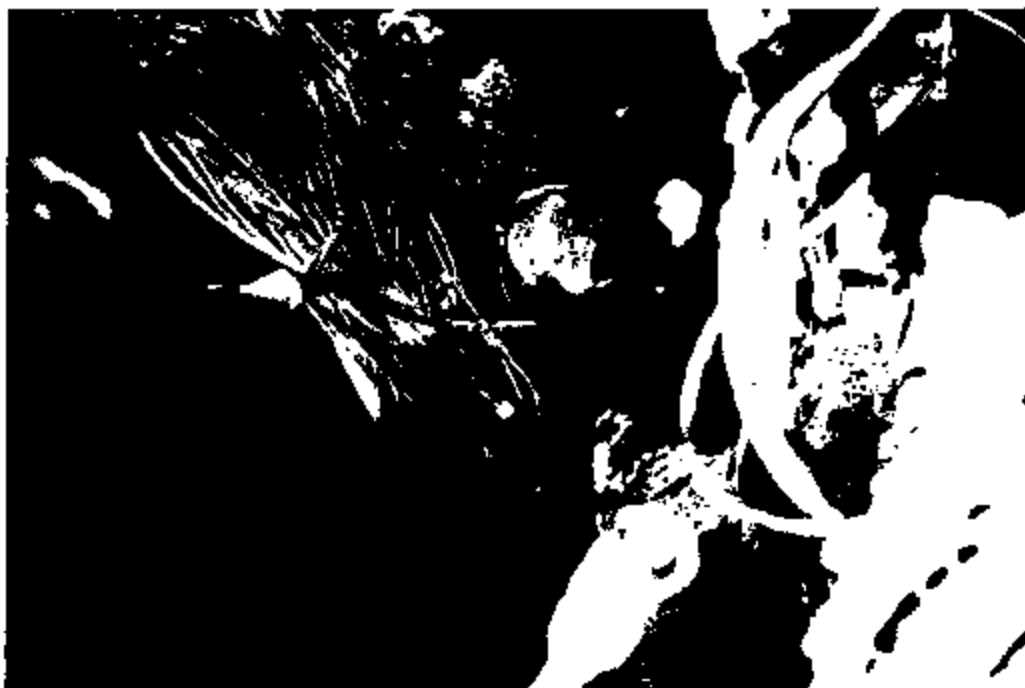


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Photo Mounting Sheet

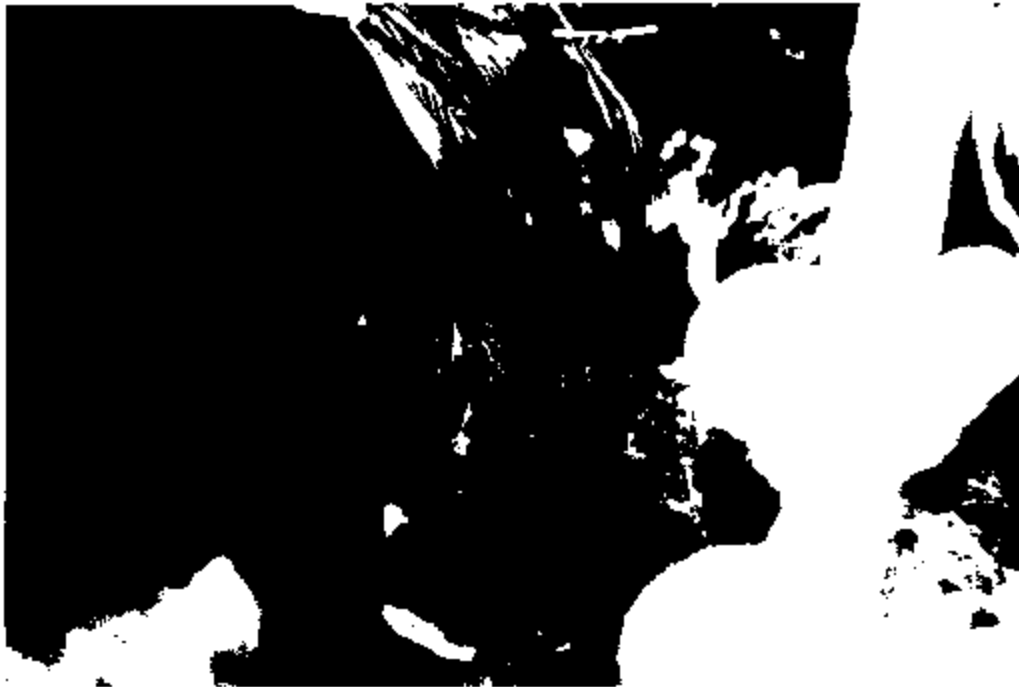


11.



12.

Photo Mounting Sheet

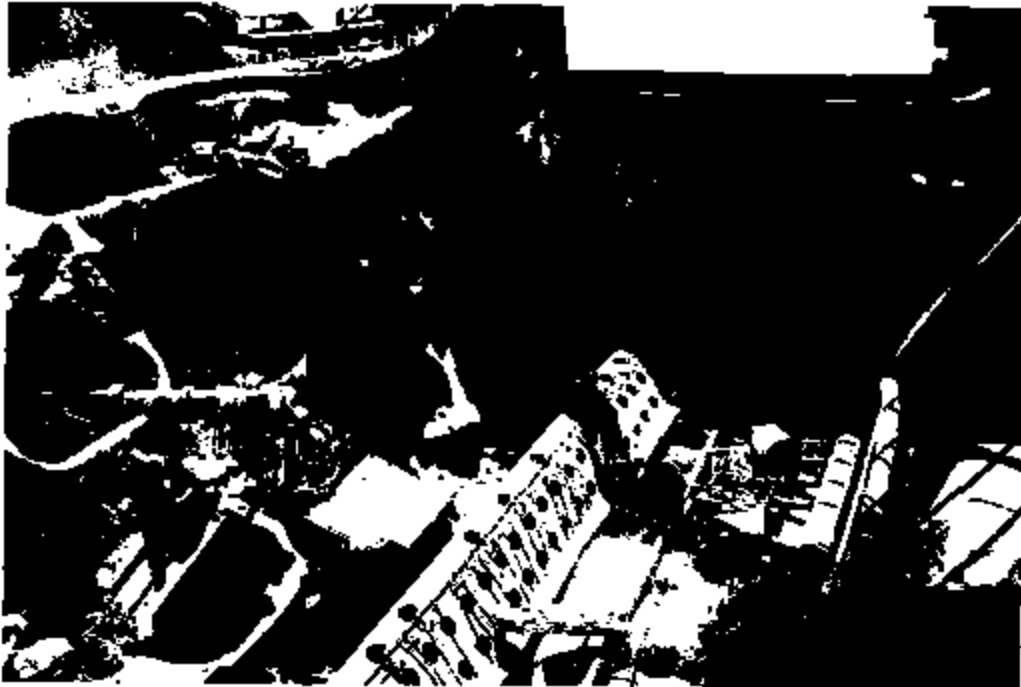


13.



14.

Photo Mounting Sheet



15.



16.

Photo Mounting Sheet



17.



18.



19.

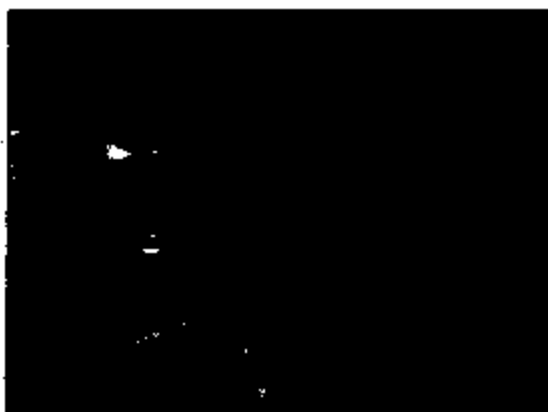


20.

harris

010810015235

5/30



RECEIVED

MAY 31 1968

107

EROS-005-LC-5288

IN THE CIRCUIT COURT FOR SUMNER COUNTY, TENNESSEE
AT GALLATIN

[REDACTED]

Plaintiff,

vs.

FORD MOTOR COMPANY,

Defendant.

No. 24715-c
TWELVE PERSON JURY DEMAND

FILED
DCT 14 2003

COMPLAINT

MANALIAH HUGHES, CLERK
BY PH D.C.

Comes now Plaintiff, [REDACTED] as subrogee of [REDACTED] by and through counsel, and for this cause of action against the Defendant, Ford Motor Company ("Ford"), would show as follows:

1. This is a products liability action pursuant to Tenn. Code Ann. Section 29-28-101, et seq.
2. [REDACTED] is a foreign corporation licensed to do business in the state of Tennessee [REDACTED] resides at [REDACTED] Portland, Tennessee [REDACTED], at all times material herein, was the insurance carrier for [REDACTED] under policy number [REDACTED]
3. Ford is a corporation organized under the laws of the state of Delaware operating with its principal office in Michigan.

FACTUAL BACKGROUND

4. Jones purchased a 1999 Ford F150, VIN number 1FTRF18L7X [REDACTED] from Hippodrome of Rivergate in Goodlettsville, Tennessee.

J:\Nash\11\2404\JonesFord\Complaint.doc

ER05-005-LC-5289

5. Ford manufactured the Ford F150 purchased by Jones.

6. On October 9, 2000, [REDACTED] was traveling on Schaub Road in Portland, Tennessee, at which time his vehicle caught on fire.

7. The fire originated in the right side of the engine compartment in the vicinity of the fuel rail, wiring harness, and transmission filler tube.

8. Prior to October 9, 2000, Ford was aware of a recall by the National Highway Traffic Safety Administration ("NHTSA"), Campaign 10 Number 98V194000, which involved a faulty "O" ring in the fuel injector that may be damaged when the fuel pressure regulator is installed. According to that recall, if the "O" ring was damaged, fuel vapor or leakage could occur, and if an ignition source is present, a fire could result. This recall affected units manufactured from March 1998 to August 1998, and could have potentially affected this vehicle. Further, it is a likely cause of the fire.

9. Further, there were other incidents found in NHTSA consumer complaints concerning engine compartment fires. Similar incidents were reported to NHTSA, which indicated a fire had occurred in the engine compartment of Ford F150 pickup trucks. The manufacturer was notified of these incidents.

CAUSES OF ACTION

Strict Liability Tort

10. The Ford F150 was designed, manufactured, distributed, and sold by Ford.

11. The subject Ford F150 pickup truck was defectively designed and/or unreasonably dangerous when it left the control of Ford.

12. In addition, the subject Ford F150's engine and/or "O" ring in the fuel injector were defectively designed and/or unreasonably dangerous when the subject vehicle left the control of Ford in that the "O" ring was known to fail, creating a potential fire risk.

13. The defective design of the subject Ford F150's engine and "O" ring rendered the truck unsafe for normal and anticipated handling and usage.

14. Furthermore, the subject vehicle was dangerous to an extent beyond that which would be contemplated by the ordinary consumer, such as [REDACTED]

15. In addition, the subject vehicle was unreasonably dangerous in that a reasonably prudent manufacturer or seller, knowing of the dangerous condition of the subject truck, would not place the truck on the market.

16. As a direct and proximate result of the defective design and/or unreasonably dangerous condition of the subject F150's engine and/or "O" ring, the truck caught fire and was destroyed.

Manufacturer's Negligence

17. Ford breached its duty to use reasonable care in designing, manufacturing, testing, and inspecting the truck and in selecting, testing, and inspecting the engine and/or "O" ring. The truck was not safe for use in the manner and purpose for which it was made. The negligence of Ford proximately caused [REDACTED] damages.

DAMAGES

18. At the time of the fire [REDACTED] [REDACTED] paid to its insured, or on its insured's behalf, the sum of \$19,646.00 as a result of the fire. Pursuant to the terms of the policy, [REDACTED] is subrogated to the rights of its insured for all

SURETY

We are surety for court costs in this cause.

**LEITNER, WILLIAMS, DOOLEY,
& NAPOLITAN, PLLC**

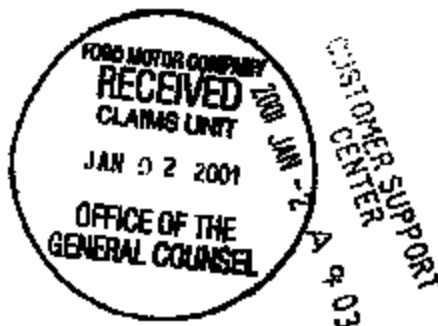
BY: Lynn T. Vo
Lynn T. Vo

Claim Recovery Consultants



December 6, 2000

Ford Motor Company
Customer Relationship Center
P. O. Box 6248
Dearborn, MI 48126



Subject: CGU Insured : [REDACTED]
Vehicle : 1999 Ford F150 4X4 Pick Up Truck
Vehicle ID #: 1FTRF18L7X [REDACTED]
Date of Fire : 10-8-00
Claim No. : [REDACTED]

Dear Sir:

CGU Insurance Company has forwarded the above captioned case to our office for subrogation handling against Ford Motor Company, due to the above loss.

We are subrogated to the rights of the above named insured for fire damage incurred within the engine compartment of the above captioned Ford vehicle. The vehicle was purchased the above vehicle, used, at Hippodrome of Rivergate in Goodlettsville, Tennessee approximately 50 days prior to the fire. There was approximately 15,000 miles on the vehicle when this loss occurred.

Our cause and origin expert is E. Melvin Hardy with Engineer and Fire Investigations of Franklin, Tennessee, telephone number is 615-778-0160. There was to be no destructive examination of testing concerning the vehicle pending the notification and inspection of representatives of Ford Motor Company, therefore, Mr. Hardy needs to be contacted so that he can accompany your representative during your inspection. The vehicle is located at SAJUSCO of Nashville, 3896 Stewarts Ln, Nashville, Tennessee, phone # is 615-742-0006.

The total amount issued on this claim for the total loss of this vehicle is \$19,646.00, of which includes the insured's \$500 comprehensive deductible. Documentation is enclosed.

We will be looking to Ford Motor Company for reimbursement of the above amount. Please get with Mr. Hardy as soon as possible to advise when you will be able to send one of your inspectors to look at this vehicle.

Thank you for your time and help in this matter!

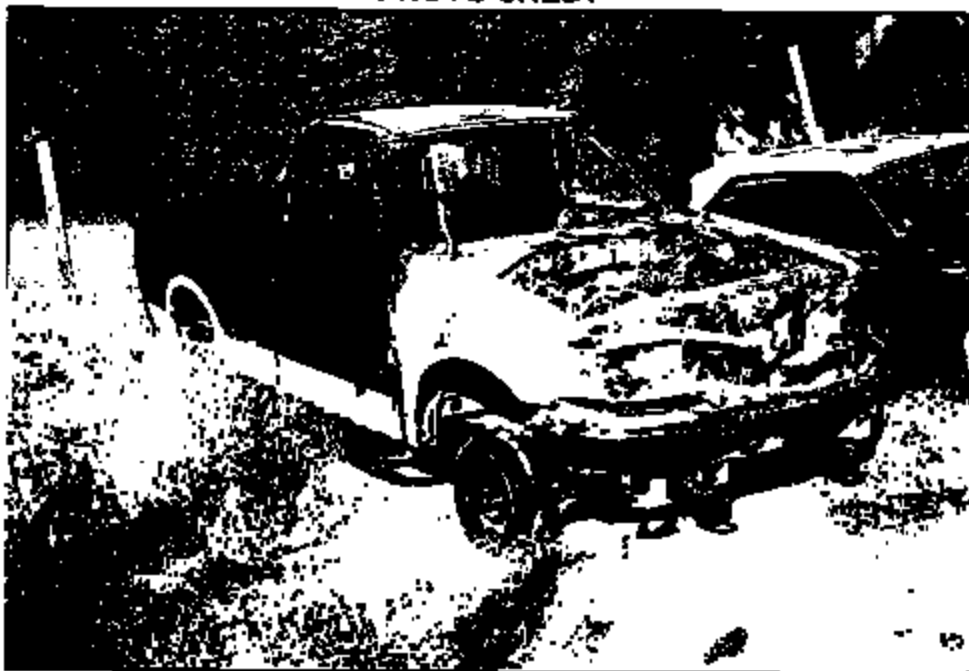
Sincerely,


Cindy Baker
Claim Recovery Consultants

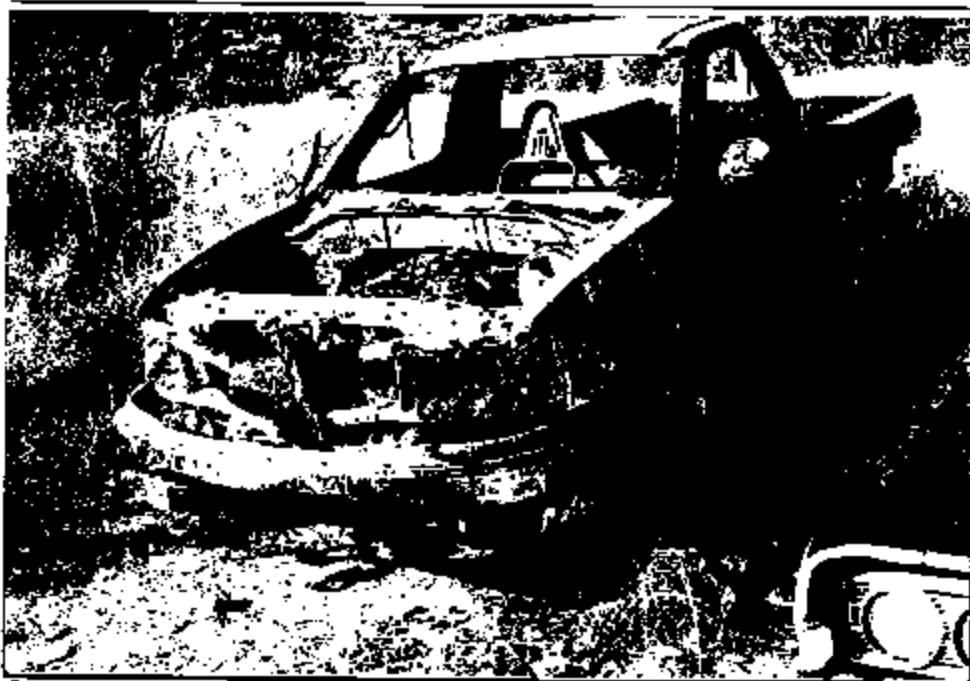
Enclosure

1483 N. Mt. Juliet Rd., # 195, Mt. Juliet, TN 37122 - 615-754-8585

PHOTO SHEET



Description : #



Description : #

Claim #

SFCHRFMA

Issue List

01/16/01 14:35:14

FCSD REGION: _____ MARKET: _____ ISSUE STATUS: _____
 P&A CODE: _____
 VIN: 1FTRF18L7X [REDACTED] CASE NUMBER: _____
 SALES REGION: _____ SALES ZONE: _____ ISSUE TYPE: _____

A	LAST HND/	Customer Phone Number/	Reason/	Stat/
C	P&A	Trmt Customer Name	Year Model	Type
	10/30/00	[REDACTED] (H) [REDACTED] (B)	REDIRECTED CALL - REDIRECT 1999 F-SERIES	C 01

F1=Help F2=AddAction F5=CustomerList F6=DealerInfo
 F7=Prev F8=Next F10=IssueDetail F11=Menu F12=Return
 NO MORE RECORDS AVAILABLE OGDB079

8225-01-200-2000

SFCHIDMA

Issue Detail

01/16/01 14:35:24

→

VIN: 1FTRF18L7XN [REDACTED] Year: 1999 Model: F-SERIES
Owner Status: SUBSEQUENT WSD: 07/02/99 Mileage: 1
Name: [REDACTED] Hm Ph: [REDACTED]
Tint: [REDACTED] Case: 529063040 Day Ph: [REDACTED]
Symptom:
Reason: REDIRECTED CALL - REDIRECT
Dealer:
Issue Type: 01 INQUIRY CAN Court: Legal Issue Type:
Issue Status: C CLOSED CAN Award: MORSII Contact: N

A/C DATE Origin Description

10/30/00 CACID9 CONSUMER AFFAIRS: ADDRESS AVAILABLE IN PHRASEOLOGY

F1=Help F2=AddAction F4=ActionDetail F6=DealerInfo
F7=Prev F8=Next F9=ViewMORSII F11=Menu F12=Return
NO MORE RECORDS AVAILABLE OGDB079

ENG-005-LC-0297

SFCHADMA

Action Detail

01/16/01 14:35:35

-->

VIN: 1FTRE18L7XN [REDACTED] Year: 1999 Model: F-SERIES
Owner Status: SUBSEQUENT WSD: 07/02/99
Name: [REDACTED] Hm Ph: [REDACTED]
Trmt: Case: 529063040 Day Ph: [REDACTED]
Symptom Desc:
Reason Desc: REDIRECTED CALL - REDIRECT
Dealer:
Issue Type: 01 INQUIRY Issue Status: C CLOSED
Comm Type: PH PHONE Odometer Reading: 1 MI
Analyst: RECCLEST ROBERT ECCLESTON Document Number:
Action Date: 10/30/00 Action Data: Action Time: 14:41:50 EST
Origin Desc: US REDIRECT CASE BASE
Action Desc: CONSUMER AFFAIRS: ADDRESS AVAILABLE IN PHRASEOLOGY
Comments: CUSTOMER SAYS: CUST FROM AN INSURANCE CO WOULD LIKE TO KNO
W THE ORIGINAL SELLING DEALER. PER CUSTOMER, DEALER SAYS:
NONE CAC ADVISED: ALL REQUESTS MUST BE SUBMITTED IN WRITIN
G TO: FORD MOTOR COMPANY; CONSUMER AFFAIRS DEPARTMENT; 1680
O EXECUTIVE PLAZA DRIVE; MD# 3NE-B; DEARBORN, MI 48126-4207
INFERENCE CASE ID: 71

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

OGDB079



Engineering and Fire
Investigations

318 Seaboard Lane
Suite 104
Franklin, TN
37067-8242
T: 615-778-0160
F: 615-778-0170

FIRE INVESTIGATION Report One and Final

INSURED: [REDACTED]
LOSS LOCATION: Portland, Tennessee
DATE OF LOSS: Unknown
CLAIM NO: [REDACTED]
EFL File NO: 94218-00634

Done

Report Date: October 24, 2000
Prepared For: CGU
P.O. Box 280908
Nashville, Tennessee 37228
Attention: Dianne Harris

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

94216-00634

October 24, 2000

Insured: [REDACTED]

ASSIGNMENT

The assignment to conduct an origin and cause investigation was received on October 11, 2000. The investigation commenced on October 15, 2000.

ENCLOSURES

- 1) Vehicle Fire Examination Report;
- 2) Thirty 35mm color photographs with explanation sheet;
- 3) Alldata Automotive Recalls and Technical Service Bulletins;
- 4) NHTSA Recall Database Search;
- 5) Carfax Database Search;
- 6) Additional Materials Packet containing unmounted photographs and negative.

INVESTIGATION

This loss involved a 1989 Ford, F150, four-wheel drive pick-up truck with Vehicle Identification Number 1FTRF16LX[REDACTED]. The burned vehicle was examined on October 15, 2000 at Sanders Garage and Towing in Portland, Tennessee. Various employees of Sanders Garage were on the premises during the course of the inspection.

The vehicle appeared in good condition prior to the loss and consistent with its age. There was no evidence of collision damage. The overall burn patterns indicated the fire had originated within the engine compartment.

The exterior examination revealed heavy fire damage throughout the engine compartment. The paint had burned from both front fenders. Oxidation patterns were noted on the fenders resulting from the burning fires. The most severe demarcation was found on the right front fender. The right front fire had burned more than the left. The hood, which is comprised of an aluminum composite, was melted away. The grill area was also heavily burned and ultimately destroyed. There was a general oxidation pattern noted on the roof. A symmetrical burn pattern was noted on the rear of the cab corresponding with the center portion of the cab. The paint on the exterior sides of the doors and body panels remained intact.

The fire patterns on the exterior of the vehicle lessened toward the interior compartment of the truck. All of the window glass had been broken as the fire spread into the interior and developed. The windshield had fallen into the interior. The side windows were broken with shattered pieces of smoke stained

94218-00634

Insured: [REDACTED]

October 24, 2000

glass recovered on the interior. Similar findings were made of the rear window. This would indicate the glass was intact at the time of the loss.

The interior inspection revealed the fire had progressed from the dash area after the fire breached the firewall. Most of the combustibles comprising the interior finish had been burned to some degree. Demarcation patterns on the interior side of the door panels indicated the fire had burned from the seat level upward. Portions of the seat padding on the lower seat frames remained.

The ignition switch was in the operating position with the key remaining in the ignition switch. The insured related that the vehicle was still running when he discovered the fire and went for help. The transmission shift lever was down at the time of the inspection as if it was in drive. According to towing personnel however, they had moved the shift lever in an attempt to disengage the four-wheel drive in order to tow the vehicle from the location where it burned.

The debris on the interior of the vehicle was systematically removed from the floor board area. The carpet remained relatively intact although melting/burning plastics had fallen to the floor as the dash area burned. Contents recovered within the interior included photographs, a small tool kit, plastic storage box, personal papers/check stubs, and the insured's keys related to his work. There was no indication any of the factory-installed components had been removed prior to the fire. There had been no aftermarket devices installed.

The wiring harness inside the interior of the vehicle had burned and was devoid of insulation. However, there was no evidence of shorting found that could have contributed to the cause of the fire. The evidence indicated the fire had originated within the engine compartment and had spread into the interior as the fire developed.

A visual inspection of the underside of the vehicle and drive-train failed to reveal any unusual or excessive oil or fluid leaks. There was no evidence of burning noted to the underside of the engine compartment or conducted heat to the floor pans.

The inspection continued in the engine compartment. As noted, this was the area of most intense burning. Virtually all of the combustible components had been consumed during the fire. The damage to the rear of the motor was not as severe as the damage to the forward portion of the motor.

The hood had melted away. There was more of the composite material on the left hood hinge than on the right hood hinge. The right side of the radiator had

94216-00634

October 24, 2000

Insured: 

melted from the interior side more than on the left. An examination of the alternator housing revealed the right side had melted more severely than had the left side. The air plenum of the throttle body was melted to the front right where two of the throats had melted as opposed to one throat on the left side. The right composite valve cover exhibited severe heating. The clamps and tubing material at the rear of the right fuel rail was completely destroyed or missing with much less damage found at the rear of the fuel rail on the left side where the clamps and remnants of the neoprene tubing remained.

The battery, which was mounted on the right fender well, had been destroyed and the plates were basically lying exposed. There was no remarkable heat or electrical damage found on the battery cables or connectors. The main conductor from the alternator to the battery had fused/arc'd to the front portion of the right fuel rail. The main wiring harness, extending from one side of the vehicle to the other across the firewall, had burned/shorted in two at the rear of the right valve cover.

All of the indicators pointed to the fire having originated on the right side of the engine. Potential accidental ignition sources in the area of origin included the electrical wiring and the exhaust manifold, which was heated during the course of the vehicle's operation. Fuel sources in the area of origin primarily consisted of the combustible insulation on the wiring, gasoline from the fuel rail/injectors, and combustible transmission fluid.

As noted, the wiring harness extending across the firewall above the rear of the right valve cover had shorted/melted in two. The damage was relatively uniform and likely occurred as the fire developed. There was also evidence of the lead wire from the alternator to the battery had shorted and fused to the fuel rail. The fused portion of the wire was not pulled loose from the rail because of the potential destruction. It could not be determined from the visual inspection if the failure could have caused a pin hole leak in the fuel rail allowing atomized gasoline to escape. There was also information concerning a stain around the first fuel injector on the right side of the engine and within the area of origin. However, there was no report of gasoline visibly leaking upon a prior occasion when it was checked. As noted, the vehicle was running at the time of the fire and if such a leak suddenly occurred, the electric fuel pump would have maintained the pressure in the fuel delivery system and fed gasoline to the fire once ignition occurred.

Also in this area was the filler tube for the transmission. Corresponding with the location of the top of the filler tube was an ashen colored pattern on the composite valve cover. The pattern and filler tube corresponded with a

94216-00834

October 24, 2000

Insured: [REDACTED]

significant amount of heat in the immediate area. The top portion of the dipstick appeared relatively in place but it was heavily charred. It should be noted that in some reported cases in other vehicles, transmission overheating has caused a back-flow discharge of fluid from the filler tube, which was subsequently ignited by the exhaust manifold. The top of the filler tube in this vehicle is above the exhaust manifold. Most transmission fluids have an ignition temperature of approximately 350 degrees, which is well within the operating temperature of the exhaust manifold. [REDACTED] related during an interview that the transmission had stuck in four-wheel drive and he had driven the vehicle in low range for approximately one mile at a speed of approximately 30mph. This might have caused the transmission to overheat.

[REDACTED] advised he had purchased the vehicle used from Hippodrome of Rivergate approximately 50 days prior to the fire. The truck had approximately 15,000 miles on it when he bought it. The only service that had been conducted consisted of an oil change performed by [REDACTED] himself.

On the day of the fire, he came upon another vehicle stuck in a ditch. He engaged the electronic shift to put the vehicle into four-wheel drive low in order to pull the vehicle out of the ditch. After removing the other vehicle from the ditch, he attempted to get the truck out of four-wheel drive, but it would not return to two-wheel drive. The switch to engage the four-wheel drive would turn but the light on the dash would not go out. He drove the vehicle for approximately a mile at a speed of approximately 30mph. He then stopped and began to try to get the vehicle back into two-wheel drive by stopping, putting it in reverse and then forward. He had tried for approximately 15 minutes when he heard a click and the light went off. He thought the four-wheel drive had been disengaged. He proceeded to drive the truck for another couple of miles at normal speed when he began to smell smoke coming from the vents. He described the odor reminiscent of burning plastic.

He stopped the vehicle and got out to check under the hood, but left the motor running. He went to the front and attempted to open the hood when flames shot out. He dropped the hood and began running to his uncle's house, which was approximately a mile away, to call for help.

Since he had purchased the vehicle, he had noticed that it would surge when it was first cranked. The engine would seem to smooth out after it had warmed up. He also reported detecting a gasoline smell each time he would fill-up the tank with gasoline. As previously indicated, he had noticed a stain on the intake manifold around the first injector on the right side of the motor. He had checked

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it but never found any standing gasoline or seen a spray when the engine was operating.

He had no opinion as to the cause of the fire. He related that he thought it had come out of four-wheel drive, but was told by the wrecker personnel that the four-wheel drive was still engaged when they attempted to pull it from the scene. They tried moving the shift level, but ended up having to disengage the four-wheel drive from under the vehicle. This information was confirmed with the personnel of Sanders Garage who pulled it.

Recall and Technical Service Bulletins were researched through Alldata and the National Highway Traffic Safety Administration regarding this particular make and model type vehicle. Although there were several technical bulletins, there was one recall that might potentially affect this vehicle. The recall, NHTSA Campaign ID Number 98V194000, involved a faulty "O" ring in the fuel injector that might have been damaged when the fuel pressure regulator was installed. It affected units manufactured from March 1998 to August 1998. The manufacture date of this particular unit is not known.

There were also two incidents found in the NHTSA Consumer Complaints concerning engine compartment fires found out of 277 records. ODI Identification Number 551280 reports that on January 7, 2000, a fire occurred in the engine compartment of a F150 Pick-up truck. The complaint indicated a possible engine failure caused the vehicle to catch fire in the engine compartment and that the vehicle was only 10 months old at the time. There were no specifics as to the cause of the fire. Additionally, ODI Identification Number 838894 reports that on April 14, 1999, the engine compartment of an F150 truck caught fire after it had been sitting for 5 minutes while running. There were also no specifics as to the failure, but it was noted that the manufacturer had been notified.

A database search of the vehicle's history through Carfax indicated on July 2, 1999 the vehicle was registered as a private vehicle, according to the Tennessee Motor Vehicle Department out of McMinnville, Tennessee. On July 29, 1999, the vehicle was first titled. The title number is 58851041. The vehicle was offered for sale at dealership on April 21, 2000 according to information from Auto Inventory in Madison, Tennessee. The reported mileage at that time was 11,855.

All of the database materials have been enclosed for your review.

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DETERMINATION OF ORIGIN AND CAUSE

This fire originated in the right side of the engine compartment in the vicinity of the fuel rail, wiring harness, and transmission filler tube. The specific cause of this fire is undetermined pending further evaluation.

COMMENTS

As we discussed, there was to be no destructive examination or testing concerning this vehicle pending the notification and inspection of representatives of Ford Motor Company. As soon as this is arranged, please advise and I will make arrangements to accompany them during their inspection. This file will be placed on a 30-day diary in the interim.

If I can be of further assistance, or if additional information is required, please do not hesitate in contacting me.

E. Metta Hardy
Vice President, Fire Investigations
Nashville, Tennessee
(615) 778-0160

30 Day Diary

EMH/mh

94216-00634

October 24, 2000

Insured: [REDACTED]

PHOTOGRAPH EXPLANATION SHEET

- 1) Front left view of the Ford F150 truck.
- 2) Rear.
- 3) Heat pattern emanating from center portion of rear window.
- 4) Right side of vehicle.
- 5) Front.
- 6) Interior portion of vehicle before any debris removal.
- 7) Floorboard on driver's side showing carpet intact and no floor level burning.
- 8) Center console area and personal papers and photographs found within.
- 9) Toolbox found under seat and additional papers.
- 10) Papers in glove box.
- 11) Wiring harness through center portion of dashboard damaged by fire.
- 12) Ignition switch and key in the operating position.
- 13) Front. Note radiator melted on right side with diagonal pattern from right to left.
- 14) Overview of engine damage.
- 15) Material remaining on left hood hinges.
- 16) Left side of engine and wiring.
- 17) Connectors remaining at rear of left fuel rail.
- 18) Heat exposure and melting to left side of alternator.
- 19) Front view of alternator showing most molten material to right side.

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- 20) More extreme damage to right side of alternator showing direction of heat travel.
- 21) Air plenum and throttle body. Note most severe melting corresponding with right side.
- 22) Fire damage and demarcation to right valve cover.
- 23) Ends of right fuel rail.
- 24) Arced/fused alternator wire at front of right fuel rail.
- 25) Burned/severed wiring harness along firewall corresponding with right valve cover.
- 26) Wiring and connections to onboard computer damaged from fire exposure.
- 27) Overview of engine showing the fire was most concentrated to front right portion.
- 28) Transmission filler tube and top of dipstick.
- 29) View of underside of vehicle from driver's side.
- 30) Underside of vehicle as viewed from right/passenger's side showing no fire under vehicle.



EFI

Engineering and Fire
Investigations

Photo Sheet

EFI No.: 14216-88634

Insured: [REDACTED]



No. 1



No. 2



Photo Sheet

EFI
Engineering and Fire
Investigation

EFI No.: 842 16-00034

Insured: [REDACTED]



No. 3



No. 4

EFI

Engineering and Fire
Investigations

Photo Sheet

EFI No.: 84218-08874

Insured: [REDACTED]



No. 1



No. 2

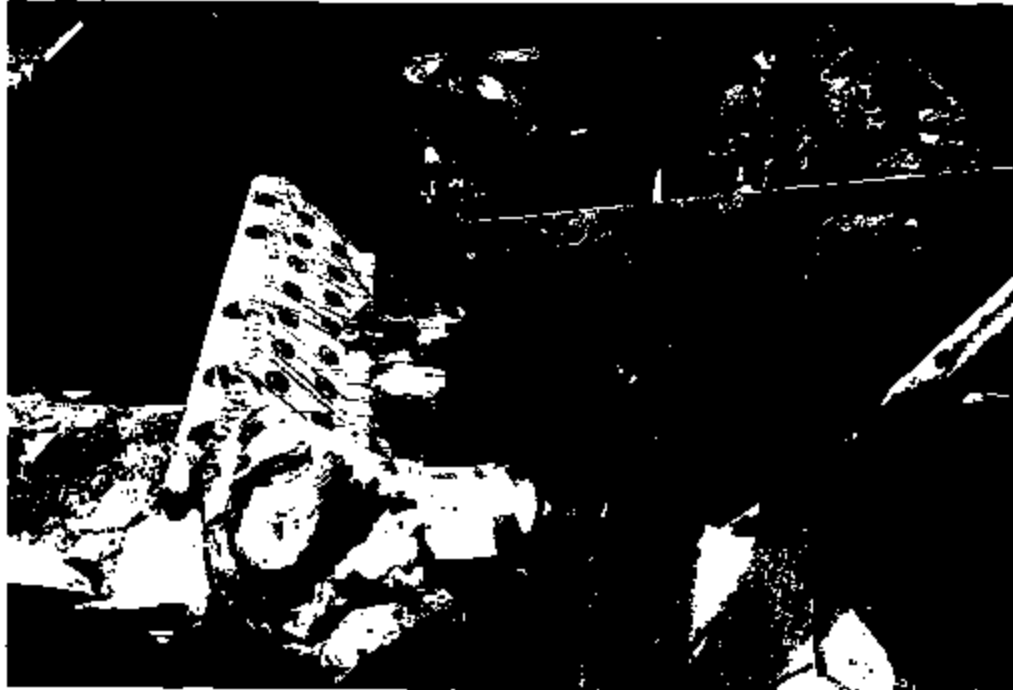
Photo Sheet

EFI No.: 94216-00034

Insured: [REDACTED]



No. 7



No. 8



EFI
Engineering and Fire
Investigations

Photo Sheet

EFI No: 96216-99834

Insured: [REDACTED]



No. 9



No. 10



EFI

Engineering and Fire
Investigations

Photo Sheet

EFI No.: NY15-00834

Insured: [REDACTED]



No. 11



No. 12

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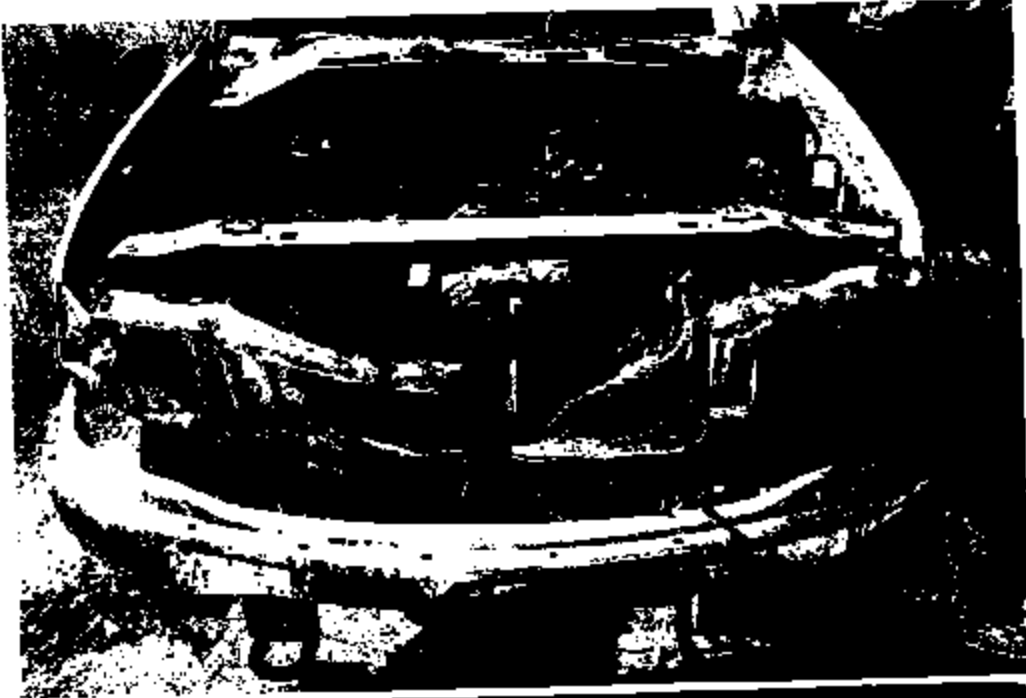
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EFI

Engineering and Fire
Investigations

EFI No.: 84219-8824

Involved: [REDACTED]



No. 13



No. 14



EF
Engineering and Fire
Investigations

Photo Sheet

EFI No.: 84216-09834

Insured: [REDACTED]



No. 18



No. 19

EFI

Engineering and Fire
Investigations

Photo Sheet

EFI No.: 64216-86834

Insured: [REDACTED]



No. 17



No. 18

Photo Sheet

EFI

Engineering and Fire
Investigations

EFI No.: 94216-00634

Insured: [REDACTED]



No. 19



No. 20

Photo Sheet

EF
Engineering and Fire
Investigation

EPI No.: 94218-00634

Insured: [REDACTED]



No. 21



No. 22

EFI

Engineering and fire
Investigations

Photo Sheet

EFI No: 94216-50634

Insured: [REDACTED]



No. 22



No. 24

EFI

Engineering and Fire
Investigators

Photo Sheet

EFI No.: 94218-00634

Insured: [REDACTED]



No. 28



No. 29

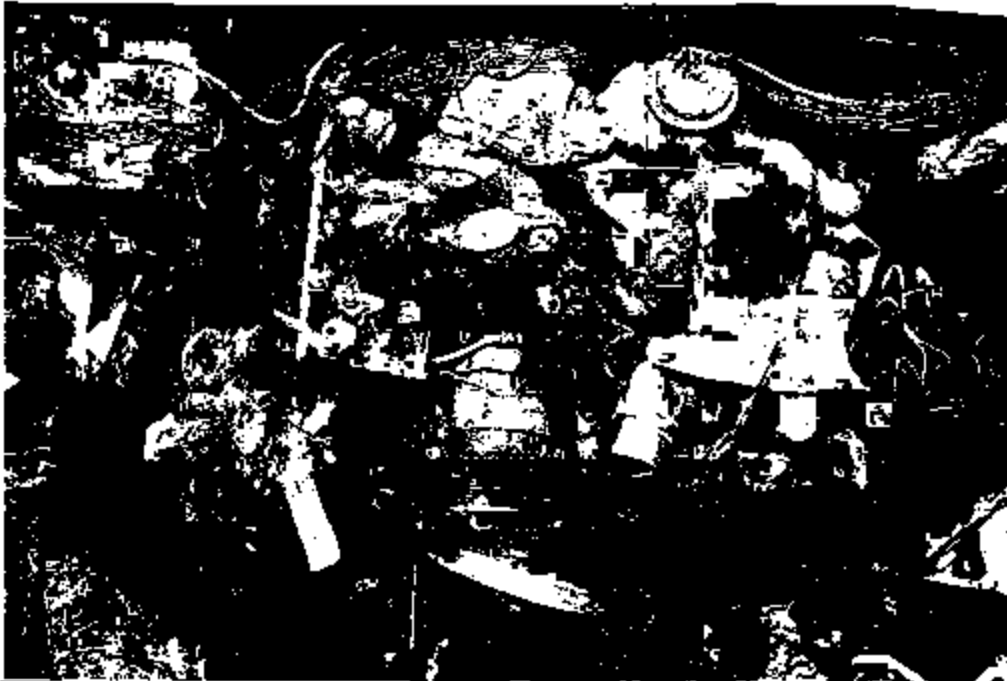


EPI
Engineering and Fire
Investigations

Photo Sheet

EPI No.: E4216-09934

Insured: [REDACTED]



No. 27



No. 28

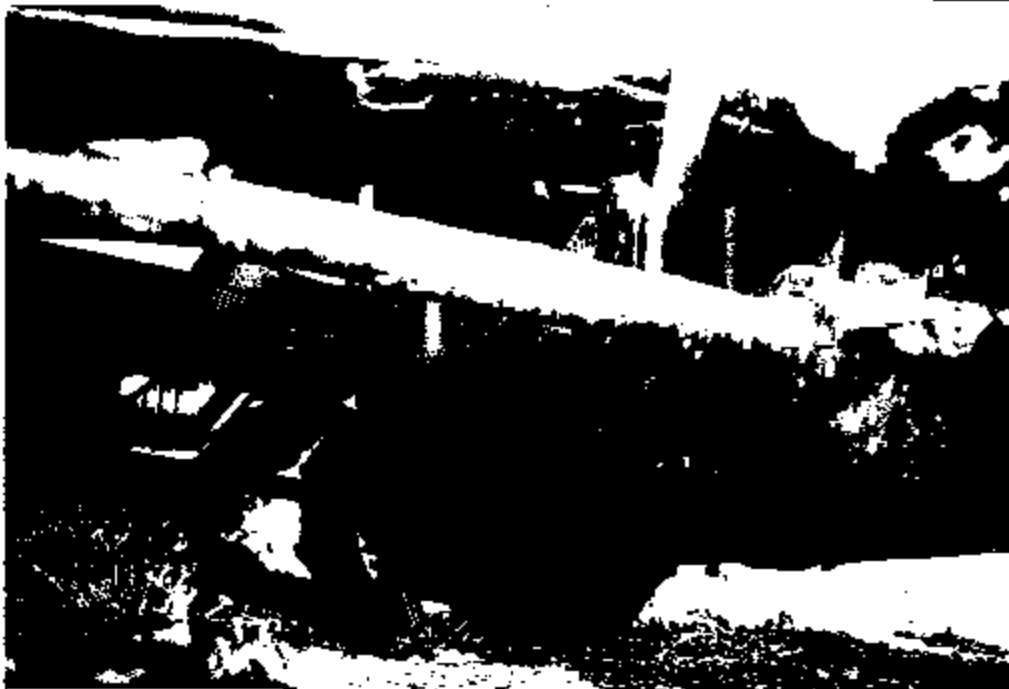
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EF1 No.: 84216-61834

Insured: [REDACTED]



No. 29

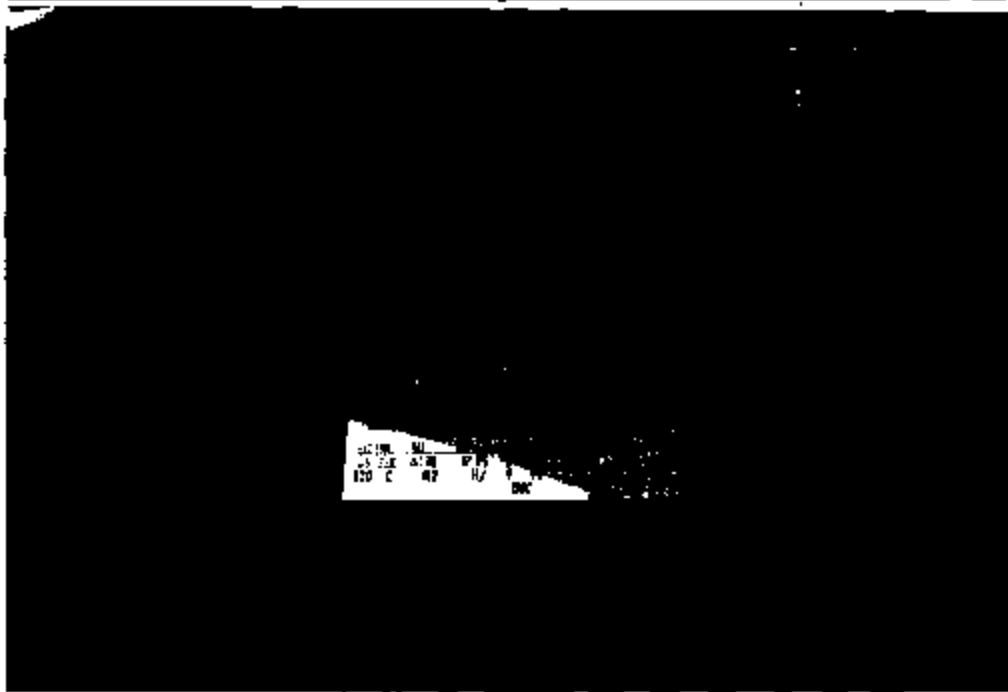


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PHOTO SHEET



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EA95-005-LC-5323

PHOTO SHEET



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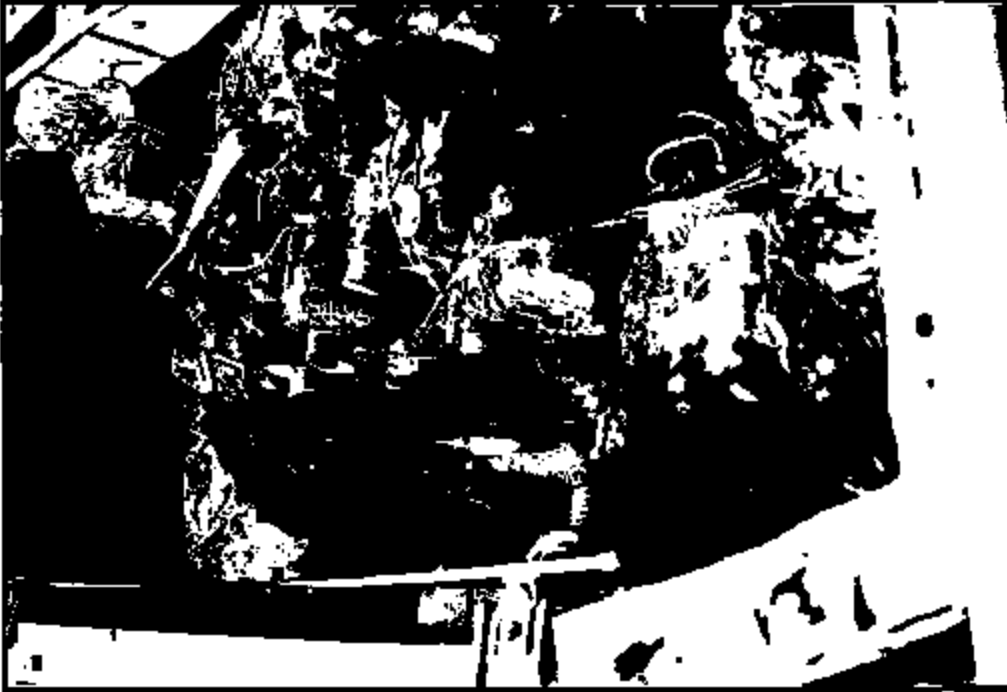


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