





FISHER KANARIS, P.C.
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April 7, 2005

Shawn L. Norton
Ford Motor Company
Office of General Counsel
Park Lane Towers West
Suite 300
Three Parkland Blvd.
Dearborn, MI 48126-2568

Re: Hanover re: [REDACTED]
Claim No.: [REDACTED]
D/L: 11/18/04
Our File No.: 04-1710

Dear Mr. Norton:

Our office was retained by Hanover Insurance in regards to a loss suffered by [REDACTED] on November 18, 2004. On that date, his 1999 Ford Expedition Eddie Bauer started on fire while parked in the driveway of his residence. Damage occurred to the vehicle which was determined by Progressive Insurance to be a total loss. Damage also occurred to his residence and his personal property therein.

Hanover Insurance is still currently adjusting the claim for the damage to the residence and personal property. The documentation of the loss is expected shortly from Hanover. The undersigned will advise you when the adjustment is complete and forward all relevant documents.

Also, be advised our office is representing the interests of Progressive Insurance in regards to the loss of [REDACTED] 1999 Ford Expedition Eddie Bauer. The vehicle VIN number is 1FMRU17LXX1 [REDACTED]. Again, the vehicle was determined to be a total loss. Enclosed please find the vehicle appraisal report prepared by Progressive Insurance and a copy of the computer print-out draft to [REDACTED] for settlement. The total amount of the settlement was \$14,836.56 which does not include the \$500.00 deductible. As such, the entire amount of that claim will be \$15,336.56.

EP05-080-LC1-1845

FISHER KANARIS, P.C.
ATTORNEYS AT LAW

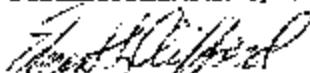
Shawn L. Norton
Ford Motor Company
April 7, 2005
Page 2

It is the undersigned's understanding that Ford has inspected the vehicle at Clarke Automotive. Please advise as to Ford's position regarding the cause and origin of the fire. Obviously, the vehicle will not be salvaged and therefore not determined until such time as liability can be established or a settlement reached. In addition, please advise whether there are any component manufacturers which Ford believes should be placed on notice of any destructive testing.

We thank you for your attention to this matter and look forward to your response shortly. If you have any questions or concerns, feel free to contact the undersigned at your earliest convenience.

Very truly yours,

FISHER KANARIS, P.C.


Ernest L. Clifford

ELC:cam
Enclosures
E:\04-1710\Letters\Ford.02.wpd

ISSUE LIST				
Last Handling Date/ Issue Status	Name/ Reason Desc	Vin/ Case No.	Model Year and Vehicle Line	Issue Type
11/23/2004 CLOSED	[REDACTED] LEGAL - FIRE CLAIM	1FMRU17LXX [REDACTED] 560309274	1999 EXPEDITION	07

EN05-080-1C1-1047

[REDACTED] 5/10/2005

All Action Details for Issue

Print

VIN: 1FMRU17D0 [REDACTED] Year: 1999 Model: EXPEDITION Case: 560303274
 Name: [REDACTED] Owner Status: Subsequent WSD: 1999-04-30
 Symptom Desc: FIRE/SMOKE VISIBLE FLAME Primary Phone: [REDACTED]
 Reason Desc: LEGAL - FIRE CLAIM Secondary Phone: [REDACTED]
 Issue Type: 07 LEGAL Issue Status: CLOSED

Action: OPEN LEGAL CONTACT - PRODUCT LIABILITY
 Dealer: 09910 VETERANS FORD Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION-FD
 Odometer: 95427 MI Comm Type: MAIL
 Analyst Name: LEICH, CHERIE Analyst: CLEICH
 Action Date: 11/22/2004 Action Time: 15:33:50.317 Action Data: No

Comments *****PRODUCT LIABILITY***** FAX RECEIVED 11-19-04. DEALER CONTACT: MIKE
 ARCENEAUX. CUSTOMER ALLEGES VEHICLE CAUGHT FIRE UNDER THE HOOD. CUSTOMER REQUESTS CONTACT FROM
 FORD REPRESENTATIVE

Action: MAKE OUTBOUND CALL TO DEALER
 Dealer: 09910 VETERANS FORD Origin Desc: CONSUMER AFFAIRS - LITIGATION
 Odometer: 95427 MI Comm Type: PHONE PREVENTION
 Analyst Name: FONSECA, LOURDES Analyst: LFONSECA
 NEARON (L.C.)
 Action Date: 11/23/2004 Action Time: 12:12:23.989 Action Data: Yes

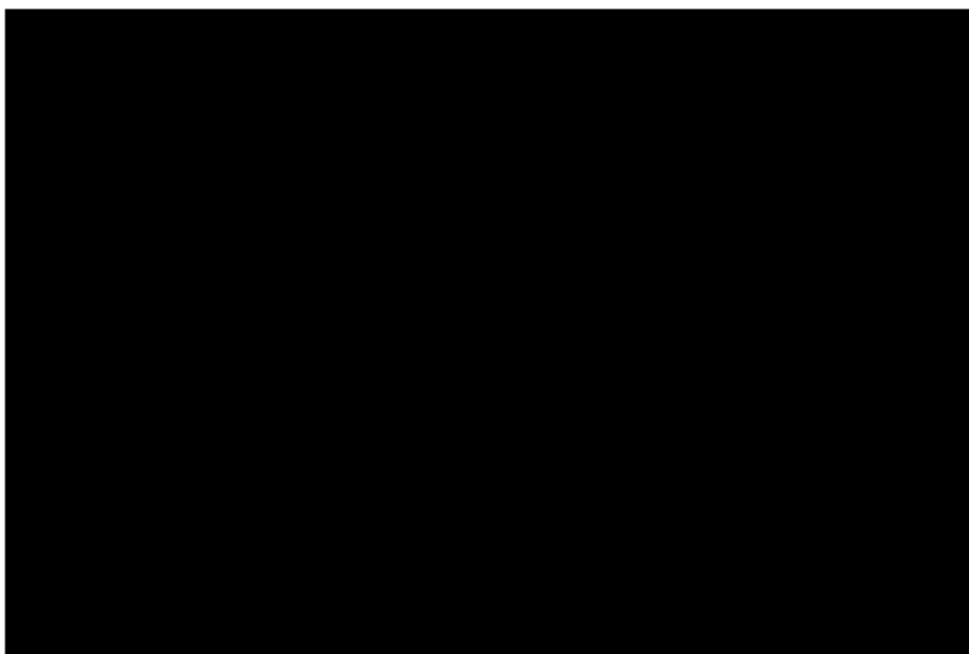
Comments PROPERTY DAMAGE ESTIMATE AT \$200,000, HOME AND CAR BURNED. LPA FORWARDING TO OGC.

Data Element Name	Data Value
CONTACT PERSON	MIKE ARCENEAUX

Action: REDIRECT TO OGC - PROPERTY DAMAGE OVER \$10,000
 Dealer: 09910 VETERANS FORD Origin Desc: CONSUMER AFFAIRS - LITIGATION
 Odometer: 95427 MI Comm Type: PHONE PREVENTION
 Analyst Name: FONSECA, LOURDES Analyst: LFONSECA
 NEARON (L.C.)
 Action Date: 11/23/2004 Action Time: 12:13:20.502 Action Data: No

Comments PROPERTY DAMAGE ESTIMATED AT \$200,000, HOME AND CAR BURNED. LPA FORWARDING TO OGC.

5603-005-1-01-1848



STATE OF MICHIGAN

JURY FEE PAID
THIS DATE:

IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE

[REDACTED]
Plaintiff,

-vs-

No. 01 CP

[REDACTED]
Defendants.

STEVE LEHTO (P45068)
ADAM S. ALEXANDER (P53584)
Attorneys for Plaintiff
31275 Northwestern Hwy., Ste. 121
Farmington Hills, MI 48334
(248) 855-0866

COMPLAINT AND JURY DEMAND

There is no other pending or resolved civil action arising out of the transaction or occurrence alleged in the complaint.

Plaintiff, by her above named attorneys, complains against the above named defendants as follows:

1. Plaintiff is a resident of the City of Clarkston, Michigan.
2. Defendant, Ford Motor Company, ("Manufacturer"), is a Delaware corporation authorized to do business in the State of Michigan and, at all times relevant hereto, was engaged in the manufacture, sale, distribution, and/or importing of Ford motor vehicles and related equipment, and carries on continuous business in Oakland County.
3. Defendant, Ford Motor Credit Company, ("Bank"), is a Delaware company engaged in the

business of financing motor vehicle purchases and leases in the State of Michigan.

4. Defendant Allstate Insurance Company, ("Allstate"), is a foreign insurance company authorized to do business in the State of Michigan and, at all times relevant hereto, was engaged in the business of insuring motor vehicles and/or motorists and assessing damage claims with respect to those motor vehicles and/or motorists and, at all times relevant hereto, carried on a continuous and systematic portion of its business within Oakland County, Michigan.

5. On or about October 3, of 2001 Plaintiff purchased a new Ford Expedition from an Authorized Ford dealer, which motor vehicle was designed, manufactured, distributed and/or imported by Defendant Manufacturer.

6. At the time of Plaintiff's purchase, Plaintiff executed a finance contract with the Defendant Bank; at all times relevant hereto, up until June 21, 2002, Plaintiff made all required installment payments to Defendant Bank on a timely basis, (a copy of the finance contract is in the possession of Defendant Bank).

7. At the time of Plaintiff's purchase, and at all times relevant hereto, Plaintiff's Ford Expedition was insured by Allstate for vehicle damage including collision and fire coverage, and Plaintiff paid all required premiums in connection with that insurance coverage. (A copy of the "insurance contract" is in the possession of Defendant Allstate).

8. On or about June 21, 2002, the subject Ford Expedition was severely damaged by a fire, causing the vehicle to be a total loss.

9. The fire and subsequent damage was caused either by a manufacturing defect, by accident, or by another circumstance which is contemplated and covered by the insurance contract, but under no circumstances was the fire caused by Plaintiff, directly or indirectly, or by anyone associated with Plaintiff either directly or indirectly.

10. In June of 2002 Plaintiff made a insurance claim with Allstate relating to the fire damage referenced above, requesting payment of benefits in accordance with the terms of the insurance contract described above; Allstate has failed and/or refused to honor the claim.

11. Since June of 2002, Plaintiff's credit record has been wrongfully derogated and damaged by Defendant Bank; Defendant Bank is also subject to all of Plaintiff's claims and defenses against Manufacturer, pursuant to MCL 445.865 and MCL 492.114a(b), and pursuant to the language of the contract itself, arising out of the above referenced sale.

12. Because of the total loss of the subject vehicle, Plaintiff was forced to purchase substitute transportation at her own expense, constituting "cover" and incurring additional expenses and damages.

13. Plaintiff additionally alleges that the damage to her credit was caused, in part or in whole, by the defective nature of the subject vehicle and/or by Allstate's wrongful failure to honor Plaintiff's insurance claim in a timely manner.

14. This cause arises out of the Defendants' breach of warranty, misrepresentation, breach of contract and bad faith, and violations of statutes, as hereinafter set forth.

15. Plaintiff seeks damages in excess of \$25,000 and/or equitable relief, including repair of her credit record and compensation for its derogation, and her claims are otherwise within the jurisdiction of this Court.

COUNT I
BREACH OF CONTRACT (ALLSTATE ONLY)

16. Plaintiff incorporates by reference all facts and allegations set forth in this complaint.

17. Plaintiff entered into an insurance contract with Allstate, wherein Plaintiff promised to pay premiums to Allstate in exchange for certain coverages including coverage for fire damage.

18. Plaintiff signed and executed all necessary documents provided by Allstate and otherwise conformed with the terms and obligations of the insurance contract.

19. On June 21, 2002, Plaintiff's vehicle was severely damaged by an accidental fire and Plaintiff informed Allstate in a timely manner of said damage and requested payment of benefits in accordance with the terms of the insurance contract described above.

20. Fire damage was a covered loss under the insurance contract and no notice has ever been given to Plaintiff that her claim would be denied for any reason whatsoever.

21. Plaintiff conformed with all responsibilities under the insurance contract and fully cooperated with Allstate performing every act and contingency required under the contract for payment of benefits.

22. Despite the fact that Plaintiff provided satisfactory proof of loss, Allstate failed and/or refused to honor Plaintiff's insurance claim.

23. Allstate's actions in failing to honor Plaintiff's insurance claim constitute a breach of the insurance contract and bad faith.

24. Plaintiff was harmed by Allstate's breach of the contract.

25. Plaintiff's damages include: derogation of her credit record, the actual cash value of the insurance contract which would fully pay the balance of the lien of the subject vehicle and/or the fair market value of the subject vehicle, and a determination by the Court that Allstate must provide insurance coverage so that Plaintiff is permanently relieved from installment payments, default, or deficiencies relating to the subject vehicle as well as interest, attorneys fees, court costs, and other incidental and consequential damages as allowed by law.

WHEREFORE, Plaintiff prays for judgment against Defendants in whatever amount above \$25,000 Plaintiff is found to be entitled, in addition to, or in the alternative for an equitable

determination to enforce the insurance contract, plus interest, costs and reasonable attorney fees.

COUNT II

MISREPRESENTATION and/or FRAUD (ALLSTATE ONLY)

26. Plaintiffs incorporate by reference all facts and allegations set forth in this complaint.
27. At all times relevant hereto, Defendants represented to Plaintiffs that the subject insurance policy would provide for fire damage coverage on the subject vehicle upon satisfactory proof of loss.
28. The foregoing representations were false.
29. Defendants made the aforesaid representations knowing the same to be false, or with reckless disregard as to whether they were true or false, or, alternatively, innocently, but with the intent that Plaintiffs rely on same.
30. Plaintiffs relied on the aforesaid representations.
31. Defendants benefitted from Plaintiffs' reliance.
32. As a direct and proximate result of Defendants aforescribed fraud and/or misrepresentation, Plaintiffs have suffered the damages set forth above, as well as mental distress, anxiety, humiliation and embarrassment.

WHEREFORE, Plaintiffs pray for judgment against Defendants jointly and severally, in whatever amount above \$25,000 Plaintiff is found to be entitled or in the alternative for an equitable determination to enforce the insurance contract, plus interest, costs and reasonable attorney fees.

COUNT III

BREACH OF WARRANTIES (FORD MOTOR COMPANY ONLY)

33. Plaintiff incorporates by reference all facts and allegations set forth in his complaint.
34. Defendant Ford is a merchant with respect to motor vehicles under MCL 440.2104.
35. The aforementioned motor vehicle purchased by Plaintiff was subject to implied warranties

of merchantability under MCL 440.2314.

36. Defendants, to induce said sale, also made certain express warranties and representations to Plaintiffs, both orally and in writing and through their advertising and conduct.

37. Said express and implied warranties and representations included, but were not limited to, the following:

- (a) Said vehicle was fit for the ordinary purposes of safe, reliable transportation;
- (b) Said vehicle was of good, sound and merchantable quality;
- (c) Said vehicle was free from defective parts and workmanship;
- (d) Said vehicle was so engineered and designed as to function without requiring unreasonable maintenance and repairs;
- (e) Any defects or non-conformities would be cured within a reasonable time;
- (f) In the event said vehicle was not free from defective parts or workmanship that Defendants would repair or replace same without cost to Plaintiff.

38. Said vehicle was not as warranted and represented and has suffered from an internal defect which caused sudden combustion so that the vehicle suffered severe fire damage.

39. As a result of its defects, said vehicle cannot be reasonably relied on by Plaintiff for the ordinary purpose of safe, comfortable and efficient transportation.

40. The vehicle is permanently damaged and totaled so that an attempted repair of the defect is impossible.

41. As a direct and proximate result of Defendants' various breaches of warranty, Plaintiff has

suffered damages, including but not limited to: payoff to the bank of the remaining lien amount, the cost and inconvenience of obtaining alternative transportation, interest and sales tax, insurance, and in addition, Plaintiff will suffer future damages, including but not limited to, the cost of covering the contract elsewhere, aggravation and inconvenience, together with costs, attorney fees and interest in attempting to obtain relief from Defendant's wrongful conduct, along with derogation of Plaintiff's credit record.

WHEREFORE, Plaintiff prays for judgment against Defendant Ford Motor Company, in whatever amount above \$25,000 Plaintiff is found to be entitled, plus interest, costs and reasonable attorney fees.

COUNT IV
LIABILITY UNDER MAGNUSON-MOSS
WARRANTY ACT (15 USC §2301 ET SEQ) (FORD MOTOR COMPANY ONLY)

42. Plaintiff incorporates by reference all facts and allegations set forth in this complaint.

43. This Court has jurisdiction to decide claims brought under 15 USC §2301 et seq, by virtue of 15 USC §2301(d)-(a).

44. Plaintiff is a consumer as defined in 15 USC §2301(3).

45. Defendants are suppliers and warrantors as defined in 15 USC §2301(4)(5).

46. The afordescribed motor vehicle is a consumer product as defined in 15 USC §2301(6).

47. 15 USC §2301(a)(1), requires Defendants, as warrantors, to remedy any defect, malfunction or nonconformance of the subject vehicle within a reasonable time and without charge to Plaintiffs, as defined in 15 USC §2304(d).

48. Despite repeated demands and despite the fact that Plaintiff has complied with all reasonable terms and conditions imposed on them by Defendants, Defendants have failed and refused to remedy within a reasonable time and without charge, the defects heretofore set forth in Count I of

this Complaint.

49. As a result of Defendants' breaches of express and implied warranties as set forth in this Complaint, and Defendants' failure to remedy same within a reasonable time and without charge to Plaintiff, Plaintiff has suffered the damages enumerated in Count I of this Complaint

WHEREFORE, Plaintiff prays that this Honorable Court enter its Order requiring Defendants to accept return of the subject vehicle and refund Plaintiff's purchase price, together with taxes, insurance premiums, interest, costs and actual attorney fees as provided by 15 USC §2310(d)(2) or in the alternative, that Plaintiff be awarded damages in whatever amount above \$10,000 she is found to be entitled, plus interest, costs and actual attorney fees.

COUNT V

VIOLATION OF MCL 445.901, ET. SEQ.

(MICHIGAN CONSUMER PROTECTION ACT/FORD MOTOR COMPANY)

50. Plaintiff incorporates by reference all facts and allegations set forth in her complaint.

51. Plaintiff is a "person" as defined in the Michigan Consumer Protection Act, MCL 445.902(b).

52. The transactions complained of herein constitute "trade or commerce" as defined in the Michigan Consumer Protection Act, MCL 445.902(c).

53. In the course of the transactions which are the subject of this lawsuit, Defendant Ford engaged in following conduct:

- (a) Making fraudulent and/or negligent representations, and misrepresentations as hereinbefore and hereinafter alleged;
- (b) Represented the subject vehicle to be of good, merchantable quality, free of defects, when in fact was not and is not;
- (c) Failing to adequately and properly inform Plaintiff of her rights and remedies with

respect to the transactions which are the subject of this Complaint;

- (d) Failing to reveal material facts including but not limited to the nature of the defects complained of herein and the fact that the subject vehicle should have been "totaled";
- (e) Failing to offer a refund of the present value of the subject vehicle or replacement of the subject vehicle in accordance with the applicable insurance contract and applicable law, and failing to reimburse Plaintiff out of pocket costs as hereinbefore outlined in accordance with the applicable insurance contract and applicable law;
- (f) Failing to provide promised benefits, including, but not limited to, a safe, reliable vehicle in addition to replacement of the subject vehicle or refund of the present value of the vehicle and/or reimbursement for out of pocket costs should the vehicle fail to conform to its warranties;
- (g) Failing to promptly restore to Plaintiff the present value of the vehicle or replace it with one similar to that which he purchased.

54. The above described conduct violated the Michigan Consumer Protection Act, specifically but not limited to the following: MCL 445.903(e),(m),(n),(p),(q),(s),(u),(y) and (z).

55. As a result of the Defendants Ford's actions, Plaintiff has suffered the damages hereinbefore set forth and loss of use of the subject vehicle, the cost of obtaining alternate transportation, as well as current and future damages including derogation of Plaintiff's credit record, loss of down payment, insurance, lost wages, as well as mental distress, harassment, humiliation and embarrassment recoverable under *Avery v. Industry Mortgage Co.*, 135 F Supp2d 840; and Plaintiff is also entitled to statutory damages and attorney fees as provided in the Michigan Consumer Protection Act, specifically, MCL 445.911. above Plaintiff has suffered the damages hereinbefore set forth and, also are entitled to statutory damages and attorney fees as provided in the Michigan Consumer

Protection Act, specifically, MCL 445.911.

WHEREFORE, Plaintiff prays for Judgment against Defendant Ford, in whatever amount above \$25,000 she is found to be entitled, and/or an equitable damages including, but not limited to a determination that Ford must keep the subject vehicle and return to Plaintiff the present value plus interest, costs and reasonable attorney fees.

COUNT VI
VIOLATION OF MCL 445.901 ET. SEQ.
(MICHIGAN CONSUMER PROTECTION ACT/ALLSTATE ONLY)

56. Plaintiffs incorporate by reference all facts and allegations set forth in this complaint.

57. Plaintiffs are a "persons" as defined in the Michigan Consumer Protection Act, MCL 445.902(b).

58. The transactions complained of herein constitute "trade or commerce" as defined in the Michigan Consumer Protection Act, MCL 445.902(c).

59. In the course of the transactions which are the subject of this lawsuit, Defendant Allstate engaged in following conduct:

- (a) Making fraudulent and/or negligent representations, as hereinbefore and hereinafter alleged, including, but not limited to the representation that Plaintiffs would be covered by insurance in case of fire;
- (b) Represented that Plaintiff's claim would be processed and handled in good faith, which it was not;
- (c) Failing to adequately and properly inform Plaintiff of her rights and remedies with respect to the transactions which are the subject of this Complaint;
- (d) Failing to reveal material facts including but not limited to excessive delays in handling the claim and facts which prevented Allstate from either denying or granting the claim

in a reasonable amount of time;

- (e) Failing to pay Plaintiff's claim in accordance with the applicable insurance policy and applicable law;
- (f) Charging Plaintiffs a price in grossly in excess of the value of the policy at the time it was sold;
- (g) Failing to provide promised benefits, including, but not limited to, the insurance benefits described above;
- (h) Failing to promptly restore to Plaintiff the present value of the vehicle or replace it with one similar to that which he purchased before it was totaled, and/or reimburse Plaintiff for out of pocket costs loss of items in the subject vehicle.
- (i) Represented that Plaintiffs' financial obligations with the FMCC would be covered by the subject insurance contract;
- (j) Causing a probability of confusion as to the approval of insurance coverage.
- (k) Representing that services had approval and benefits that they did not have, including but not limited to the subject automobile insurance coverage.
- (l) Entering into a consumer transaction in which the consumer waives or purports to waive a right, benefit, or immunity provided by law, unless the waiver is clearly stated and the consumer has specifically consented to it.

60. The above described conduct violated the Michigan Consumer Protection Act, specifically but not limited to the following: MCL 445.903(a),(c),(e),(m),(u),(o),(p),(q),(s),(t),(u),(v) and (z).

61. As a result of the Defendant Allstate's actions, Plaintiff has suffered the damages hereinbefore set forth and loss of use of the subject vehicle, the cost of obtaining alternate transportation, as well as current and future damages including derogation of Plaintiff's credit record,


loss of down payment, insurance, lost wages, as well as mental distress, harassment, humiliation and embarrassment recoverable under *Avery v. Industry Mortgage Co.*, 135 F Supp2d 840; and Plaintiff is also entitled to statutory damages and attorney fees as provided in the Michigan Consumer Protection Act, specifically, MCL 445.911.

WHEREFORE, Plaintiffs pray for Judgment against Defendant Allstate as outlined in Count I of Plaintiff's complaint, in whatever amount above \$25,000 they are found to be entitled or in the alternative for an equitable determination to enforce the insurance contract, together with statutory attorney fees, plus interest, costs and all incidental and consequential damages allowed by law.

DEMAND FOR JURY TRIAL

Plaintiff hereby demand a jury trial in the above entitled cause.

Respectfully submitted,

By: 
STEVE LEHTO (P45068)
ADAM S. ALEXANDER (P53584)
Attorneys for Plaintiff
31275 Northwestern Hwy., Ste. 121
Farmington Hills, MI 48334
(248) 855-0866

April 21, 2003

MARKET CLAIM OFFICE
2600 TROY CENTER DRIVE #102
TROY MI 48064

PHONE NUMBER: 248-643-8100
OFFICE HOURS: MONDAY-FRIDAY 8:00-5:30



July 24, 2002

FORD MOTOR CO - CUSTOMER ASSISTANCE CENTER
P.O. BOX 6248
DEARBORN MI 48121

CONSUMER AFFAIRS
SECTION

2 JUL 26 P3:53

Allstate Insurance Company

Claim Number: [REDACTED]

Our Insured: [REDACTED]

Date of Loss: June 21, 2002

Re: 2001 Expedition, VIN 1FMPU16LX1 [REDACTED]



Please accept this letter as notice for our subrogation rights on the above captioned matter.

On June 21, 2002 our customers 2001 Ford Expedition sustained a fire loss resulting in substantial damage. We secured a cause and origin report (please find copy enclosed) in which it was determined that the fire was caused by faulting wiring.

The vehicle is currently located at our Total Loss storage facility at 13000 Haggerty, Belleville, MI 734-699-5500 and is available for your inspection.

Please forward all correspondence to my attention at Allstate Insurance, 2600 Troy Center Dr, Suite 102, Troy MI 48064. I can be reached at 1-248-816-8861 Monday - Friday 8:00 AM - 4:30 PM.

Thank you.

Sincerely,

SHELLEY IVESON
Allstate Insurance Company

SH07/0/02/1

July 8, 2002

IN RE: Allstate Claim No. [REDACTED]
H&A File No. 02-1493VF
[REDACTED]

BERNDON
ASSOCIATES

Investigators/Consultants

35136 Schoolcraft
Livonia, Michigan 48150
Fax: 734-591-0140

1 800 961-2909
wal@berndon-assoc.com
dan@berndon-assoc.com

P.O. Box 27
Boysie City, Michigan 49712
231 582-5543

Licensed in Michigan,
Ohio, Illinois and Arizona

www.berndon-assoc.com

PREDICATION:

This report is predicated upon the request of Ms. Shelley Imason, Allstate Claims Representative, to conduct an investigation into [REDACTED] with special reference to the fire loss of a 2001 Ford, Expedition.

SECRETARY OF STATE:

Through the Secretary of State, the following information was obtained:

2001 FORD	1FMPU16LX1 [REDACTED]
32 STA-WAGON	ORIGINAL
10/03/2001	175M2750224 EXPEDITION 16 A

[REDACTED]
CLARKSTON [REDACTED]

FORD MOTOR CREDIT COMPANY
PO BOX 105704 10/02/2001
ATLANTA GA 30348

REGISTRATION INFORMATION:

MTX885	PC-TRANSFER
09/01/2002	K-524-511-734-610

INSPECTION:

On June 28, 2002 at 9:00 a.m., this Investigator arrived at Suburban Ford, in Waterford, to conduct an investigation into the fire loss of a 2001 Ford, Expedition.

EC05-005-LC1-1052

IN RE: Allstate Claim No. [REDACTED]
H&A File No. 02-1493VF
[REDACTED]

July 8, 2002
Page 2

Once at the scene, a close inspection provided the following information:

SEE ENCLOSED INVESTIGATION REPORT

Prior to leaving the scene, several 35mm color photographs were taken and are enclosed.

ORIGIN AND CAUSE INVESTIGATION:

On June 28, 2002 at 9:00 a.m., this investigator arrived at Suburban Ford in Waterford to conduct an origin and cause investigation into the fire loss of a 2001 Ford, Expedition, white in color, Vehicle Identification Number 1FMPU16LX1L [REDACTED]

Upon arriving at the dealership, the vehicle is located in a secured lot and at this time, the remains of the Vehicle Identification Number in the area of the windshield and dash have been partially destroyed by the fire, however, the last four digits are legible, reading 4006.

Initial observations reveal evidence of a fire to have originated within the engine compartment, that extended to the melting and cracking of all of the window glass. The fire further extended to blistering of the painted surfaces of the entire vehicle.

The examination of the fuel tank, fill tube and fuel cap reveals all are intact with no evidence of any fuel leakage. The examination of the underside reveals it is free of any fire origin.

At this time, the examination is focused to the rear cargo area, where high burning is present throughout and there is no evidence of any fire origin. Wiring traveling throughout the rear cargo area reveals charred wiring insulation present, and there is no evidence of any electrical failure that could be found and attributed to the cause of the fire. The inspection continues, and the carpeted rear cargo floor area is basically intact, and there is no evidence of any low burning.

At this time, the examination is focused to the passenger compartment, where again, high burning is present throughout. Seat cushion material remains on all seats, all four floor areas are basically intact and there is no evidence of any low burning.

The dashboard reveals combustibles remaining along the entire length of same, however, the fire damage is more pronounced on the right or passenger side versus the left or driver's side.

IN RE: Allstate Claim No. [REDACTED]
H&A File No. 02-1493VF
[REDACTED]

July 8, 2002
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Wiring traveling along the dashboard reveals charred wiring insulation present and no evidence of any electrical failure could be found and attributed to the cause of the fire.

At this time, the inspection is focused to the engine compartment, whereupon examining same, it is determined that a fire has originated within the engine compartment, and the fire damage present is high in nature. The examination of the front section of the engine compartment reveals little remains of the air conditioning condenser and radiator. The transmission cooler lines reveal hose material remaining within the compression fittings, combustibles remain in the lower section of the engine compartment within the front, and there is no evidence of any fire origin.

The examination of the left or driver's side of the engine compartment reveals the power distribution center is secured to the inner left fender, combustibles surround same, also wiring traveling from same reveals it is void of insulation. The examination does reveal a main cable traveling from the power distribution center, along the cowl, and over to the starter solenoid on the right or passenger side and is found to be void of insulation.

At this time, the examination is focused to the right front of the engine compartment, where the remains of battery plates are found, both battery cables are void of insulation, and there is no evidence of any electrical failure that could be found and attributed to the cause of the fire.

At this time, a subsequent check of the fluid levels reveals the oil is mixed with water due to extinguishment, the transmission fluid level is full and clean, and all remaining fluids have drained during the course of the fire.

The examination of the top of the engine reveals both combustible balance tubes for the fuel rail to have been consumed, however, the fuel lines in the left rear of the engine compartment reveals they are basically intact, both retaining clips are intact, and no evidence of any fuel leakage could be found and attributed to the cause of the fire. Also, combustibles do surround all fuel injectors, confirming no fire origin due to fuel leakage from the injectors.

The examination of both valve covers reveals fire damage present, however, they are basically intact. The examination continues, and the front of the engine reveals fire damage present to the casting, more pronounced on the left or driver's side versus the right or passenger side. The examination of the power steering line in the left front lower section of the engine compartment reveals hose material still present, confirming no fire origin within the lower section of the

IN RE: Allstate Claim No. [REDACTED]
H&A File No. 02-1493VF
[REDACTED]

July 8, 2002
Page 4

engine compartment. The examination of the bottom of the engine does reveal evidence of combustible fluid present, however, no evidence of any fire origin.

At this time, the examination is focused to the alternator, where fire damage is present to the casing and the heavier gauge cable traveling from same to the starter solenoid is completely void of insulation, with evidence of electrical faulting, to include arcing and fusing, in the middle of the cable. Further, upon reconstructing the routing of the cable that travels from the power distribution center to the starter solenoid and the cable that travels from the alternator to the starter solenoid, the cable for the alternator broke in two, closest the starter solenoid, as it is brittle.

At this time, the examination is focused to both front cast wheels, where the fire damage present to the inner right or passenger side is much more prevalent, versus the left or driver's side.

At this time, after completing the above inspection and examination, it is the opinion of this Investigator that the fire was accidental in nature. It is further the opinion of this Investigator that the fire originated within the engine compartment, and at this time, the investigation continues.

TITLE INFORMATION:

A review of the title information indicates that the 2001 Ford, Expedition is an original purchase in the name of [REDACTED] of 6061 Snow Apple Drive in Clarkston as of October 3, 2001, at which time, the odometer read 16 actual miles. The secured interest is listed as Ford Motor Credit Company and the Michigan license plate of [REDACTED] is not due to expire until September 1, 2002. The driver's license number listed on the registration is [REDACTED]

NICB VINASSIST:

A review of the NICB Vinassist indicates that the 2001 Ford, Expedition 4x4 is equipped with a 5.4 liter, V8 engine and was assembled in Wayne, Michigan.

IN RE: Allstate Claim No. [REDACTED]
H&A File No. 02-1493VF
[REDACTED]

July 8, 2002
Page 5

NATIONAL HIGHWAY TRAFFIC & SAFETY ADMINISTRATION:

A search of the National Highway Traffic and Safety Administration, Recall Database, produced four recalls, and upon reviewing same, none were found to pertain to the fire in question.

ALLDATA SYSTEM:

A search of the Alldata System produced nine recalls pertaining to the vehicle in question. upon reviewing same, none were found to pertain to the fire in question.

A further search was conducted of the Technical Service Bulletins, producing a number of bulletins pertaining to the vehicle in question. Upon reviewing same, none were found to pertain to the fire in question.

INTERVIEW (LESLIE KUNKLER):

On June 27, 2002 at 4:30 p.m., Investigator Robert Persyn conducted an interview with [REDACTED] who is the title holder, named insured and primary operator of the vehicle in question.

It was learned that the fire occurred on June 21, 2002 at approximately 1:52 a.m. while parked at 1985 Oakwood in Ortonville. Subsequently, the Brandon Township Fire Department was summoned and subsequently extinguished the fire involving the 2001 Ford, Expedition, equipped with an eight cylinder engine.

Further questioning revealed that the vehicle was purchased new in September of 2001 from Allen Ford on Telegraph Road in Pontiac. A three year, 36,000 mile warranty was issued at the time of the purchase and no extended warranty was ever purchased. Since ownership, warranty work completed included a loose bolt on a door and was satisfied at Allen Ford in Pontiac. At the time of the fire, the fuel tank was approximately one-quarter full and [REDACTED] boyfriend checks the fluid levels on a regular basis. The last person to have entered the engine compartment was [REDACTED] boyfriend to change the oil, one month prior to the fire. Oil changes are secured every 3,000 to 4,000 miles and no oil or other fluids are ever added. Prior to parking the vehicle last, there were no operability problems, no warning lights illuminated and there were no changes in any of the gauges. Further, no mechanical or electrical problems had been experienced.

IN RE: Allstate Claim No. [REDACTED]
H&A File No. 02-1493VF
[REDACTED]

July 8, 2002
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The mileage at the time of the purchase was new and the mileage at the time of the fire loss was approximately 8,000 miles. Further questioning revealed that [REDACTED] is a nonsmoker and no one was smoking in the vehicle prior to parking the vehicle. It was also learned that a CD changer had been installed by Allen Ford at the time of the purchase.

Further questioning revealed that the vehicle had been involved in a minor accident in the left front, as the front marker light and yellow running light had been replaced by LA Collision on Baldwin Road in Pontiac and Allstate serviced the claim.

At the time of the fire, the vehicle had been parked since Tuesday, and on Friday at 1:52 a.m., the vehicle was on fire and the Brandon Township Fire Department responded and extinguished the fire.

[REDACTED] indicated that she was not present during the course of the fire and could not provide any specifics. In a short scenario, [REDACTED] reiterated that the vehicle had been parked at her mom's house since Tuesday, and apparently, the Brandon Township Fire Department responded to the vehicle fire on Friday, at approximately 1:50 a.m. On the fire report, it indicates that the fire is a result of an electrical short, possibly the computer within the engine compartment. [REDACTED] has no idea as to the cause of the fire. When questioned regarding if any contents were in the vehicle at the time of the fire, it was learned that papers, a school bag, and other miscellaneous items were present. At this time, no further information could be obtained and the interview was terminated.

CONCLUSION:

Having completed an examination of the vehicle, interviewed the insured, who last operated the vehicle prior to the fire, conducted research pertaining to the vehicle in question, and based upon all of the information known at the time of the preparation of this report, it is the opinion of this Investigator that the fire was accidental in nature. It is further the opinion of this Investigator that the fire originated within the engine compartment, where there is evidence of electrical faulting, to include arcing and fusing within the alternator/generator cable, sufficient to ignite the wiring insulation and immediate combustibles into open flame, with the fire extending upward and outward from that location, causing the damage present. The fire is deemed to be an accidental fire, electrical in nature.

IN RE: Allstate Claim No. [REDACTED]
H&A File No. 02-1493VF
[REDACTED]

July 8, 2002
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At this time, all requests for services have been completed, we are closing our file and forwarding our report and photographs for your review.


Timothy P. Herndon


Walter O. Herndon, Jr.
(Concurring)

TPH/jam

VEHICLE FIRE INVESTIGATION

H.A. ASSOCIATES
Investigators/Consultants

6135 Schoolcraft
Livonia, Michigan 48150
AX 734-691-6140

800-861-2909
rah@hamdon-assoc.com
lrah@hamdon-assoc.com

P.O. Box 27
Livonia City, Michigan 48172
31-682-6543

Licensed in Michigan, Ohio
Illinois & Arizona

Fire Dept. Branon

Incident No. NOT REQ.

Date/Time Of Investigation 6-28-02 @ 9 AM

Vehicle Examined At Suburban Ford, Waterford

Location At Time Of Fire 1985 Oakwood, Ortonville

Alley ☐ Building ☐ Driveway/Garage ☒ Field ☐ Freeway ☐ Park ☐ Pk Lot ☐ Street ☐

Date Of Fire 6-21-02 Day _____ Time of Call 152 A Arrived _____ Clear _____

Description Of Vehicle Fire

Title Holder:	
Owner	[REDACTED]
Address	[REDACTED]
Year <u>2001</u> Make <u>Ford</u> Model <u>Expedition</u>	
Color: (Top) <u>WHT</u> (Bottom) <u>WHT</u>	
License Plate:	
State <u>MI</u> Number [REDACTED] Expiration Date <u>7-1-02</u>	
Vehicle Identification Number: <u>1FMPUJ6LX1E</u> [REDACTED]	
Lien Holder: <u>Ford Motor Credit Company</u>	
Insurance Company: <u>Allstate</u>	

Passenger Compartment (Interior)

Dashboard:	Intact <input type="checkbox"/>	Missing <input type="checkbox"/>	Partially Consumed <input checked="" type="checkbox"/>	Consumed <input type="checkbox"/>
Radio:	Intact <input checked="" type="checkbox"/>	Missing <input type="checkbox"/>	Aftermarket <input type="checkbox"/>	
Speakers:	Intact <input checked="" type="checkbox"/>	Missing <input type="checkbox"/>	Aftermarket <input type="checkbox"/>	
Bulkhead:	Intact <input type="checkbox"/>	Breached By Fire <input checked="" type="checkbox"/>		
Ignition:	Intact <input checked="" type="checkbox"/>	Missing <input type="checkbox"/>	On Position <input type="checkbox"/>	Off Position <input checked="" type="checkbox"/>
			Locked <input checked="" type="checkbox"/>	Thumb Assist Off <input type="checkbox"/>
Tampered With/Intact	<input type="checkbox"/>	Tampered With/Defeated	<input type="checkbox"/>	Destroyed By Fire <input type="checkbox"/>
				In Debris <input type="checkbox"/>
Steering Column:	Intact/Locked <input checked="" type="checkbox"/>	Intact/Unlocked <input type="checkbox"/>	Tampered With/Intact	<input type="checkbox"/>
			Tampered With/Defeated	<input type="checkbox"/>
			Missing	<input type="checkbox"/>
			Destroyed By Fire	<input type="checkbox"/>
Gear Shift Selector (Column <input checked="" type="checkbox"/> Floor <input type="checkbox"/>		Locked <input checked="" type="checkbox"/>	Unlocked <input type="checkbox"/>	Destroyed By Fire <input type="checkbox"/>
		Manual <input type="checkbox"/>		
Front Seat:	Intact <input type="checkbox"/>	Missing <input type="checkbox"/>	Partially Consumed <input checked="" type="checkbox"/>	Consumed <input type="checkbox"/>
Rear Seat:	Intact <input type="checkbox"/>	Missing <input type="checkbox"/>	Partially Consumed <input checked="" type="checkbox"/>	Consumed <input type="checkbox"/>
Third Seat:	Intact <input type="checkbox"/>	Missing <input type="checkbox"/>	Partially Consumed <input type="checkbox"/>	Consumed <input type="checkbox"/>
				N/A <input checked="" type="checkbox"/>
Glove Box:	Intact <input type="checkbox"/>	Partially Consumed <input checked="" type="checkbox"/>	Consumed <input type="checkbox"/>	
Items In Glove Box				
Owner's Manual	<input checked="" type="checkbox"/>	Miscellaneous Papers	<input type="checkbox"/>	
Center Console	Intact <input type="checkbox"/>	Partially Consumed <input checked="" type="checkbox"/>	Consumed <input type="checkbox"/>	N/A <input type="checkbox"/>
Items In Center Console				

VEHICLE FIRE INVESTIGATION 2

Passenger Compartment (Interior) Cont.

13	Air Bags:					
	Steering Wheel:	Intact <input type="checkbox"/>	Missing <input type="checkbox"/>	Deployed <input type="checkbox"/>	Fire Damaged <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
	Passenger Side Dash:	Intact <input type="checkbox"/>	Missing <input type="checkbox"/>	Deployed <input type="checkbox"/>	Fire Damaged <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
	Right Rear:	Intact <input type="checkbox"/>	Missing <input type="checkbox"/>	Deployed <input type="checkbox"/>	Fire Damaged <input type="checkbox"/>	N/A <input type="checkbox"/>
	Left Rear:	Intact <input type="checkbox"/>	Missing <input type="checkbox"/>	Deployed <input type="checkbox"/>	Fire Damaged <input type="checkbox"/>	N/A <input type="checkbox"/>
	Side Air Bags (Driver):	Intact <input type="checkbox"/>	Missing <input type="checkbox"/>	Deployed <input type="checkbox"/>	Fire Damaged <input type="checkbox"/>	N/A <input type="checkbox"/>
	Side Air Bags (Pass):	Intact <input type="checkbox"/>	Missing <input type="checkbox"/>	Deployed <input type="checkbox"/>	Fire Damaged <input type="checkbox"/>	N/A <input type="checkbox"/>
	Headliner/Curtain:	Intact <input type="checkbox"/>	Missing <input type="checkbox"/>	Deployed <input type="checkbox"/>	Fire Damaged <input type="checkbox"/>	N/A <input type="checkbox"/>
14	Ignition Key:	None Found <input checked="" type="checkbox"/>	In Ignition <input type="checkbox"/>	At Scene <input type="checkbox"/>	In Debris <input type="checkbox"/>	
15	Odometer Reading:	Analog <input type="checkbox"/> Digital <input type="checkbox"/> Oil Change Sticker <input type="checkbox"/> Vandalized <input type="checkbox"/>				
		Removed <input type="checkbox"/>	Destroyed By Fire <input checked="" type="checkbox"/>	Date:		
16	Title Information: (Date Of Transfer To Current Owner/Mileage)					
	10-3-01 16A					
17	Personal Effects In Passenger Compartment					
	Ø					

Engine Compartment

18	Engine Accessibility:	Limited (Hood Jammed) <input type="checkbox"/>	Open <input checked="" type="checkbox"/>	Forced Open By Investigator <input type="checkbox"/>	
19	Engine:	Intact <input type="checkbox"/>	Missing <input type="checkbox"/>	Partially Stripped <input type="checkbox"/>	Fire Damaged <input checked="" type="checkbox"/>
20	Battery:	Intact <input type="checkbox"/>	Missing <input type="checkbox"/>	Fire Damaged <input checked="" type="checkbox"/>	
21	Aux Battery:	Intact <input type="checkbox"/>	Missing <input type="checkbox"/>	Fire Damaged <input checked="" type="checkbox"/>	N/A <input checked="" type="checkbox"/>
22	Radiator:	Intact <input type="checkbox"/>	Missing <input type="checkbox"/>	Fire Damaged <input checked="" type="checkbox"/>	
Fluid Levels - NOTE: D.B.F. = DRAINED BY FIRE					
23	Oil <input checked="" type="checkbox"/> H2O	Transmission Full	Radiator	Brake	Power Steering
	D.B.F. <input type="checkbox"/>	D.B.F. <input type="checkbox"/>	D.B.F. <input checked="" type="checkbox"/>	D.B.F. <input checked="" type="checkbox"/>	D.B.F. <input checked="" type="checkbox"/>
24	Belts:	Intact <input type="checkbox"/>	Partially Consumed <input type="checkbox"/>	Consumed <input checked="" type="checkbox"/>	
25	Upper Hose:	Intact <input type="checkbox"/>	Partially Consumed <input type="checkbox"/>	Consumed <input checked="" type="checkbox"/>	
26	Lower Hose:	Intact <input type="checkbox"/>	Partially Consumed <input type="checkbox"/>	Consumed <input checked="" type="checkbox"/>	
27	Engine Parts Missing:	Ø			
28	Anti-Theft System:	Factory <input checked="" type="checkbox"/>	Type: Security Lock	Unknown <input type="checkbox"/>	
29	Additional Information:	Ø			

Exterior Examination

30	Tires:				
	Type	Custom Wheels/Wheel Covers	% of Tread Wear	No. Of Lugs	Missing
LF	1	1	Consumed	All	
LR	1	1		NONE	X
RF	1	1	Consumed	All	

VEHICLE FIRE INVESTIGATION 3

Door Cylinders (Locks)

31	Driver Door:	Intact		Fire Damaged	<input checked="" type="checkbox"/>	Forced Entry	
32	Left Rear (sliding/cargo) Door(s):	Intact		Fire Damaged		Forced Entry	
33	Rear Cargo Door(s):	Intact		Fire Damaged		Forced Entry	
34	Right Rear (sliding/cargo) Door(s):	Intact		Fire Damaged		Forced Entry	
35	Passenger Door:	Intact		Fire Damaged	<input checked="" type="checkbox"/>	Forced Entry	

Trunk Compartment Examination

36	Pickup		Van		Utility Vehicle	<input checked="" type="checkbox"/>	
37	Trunk Lock:	Intact <input checked="" type="checkbox"/>	Locked <input checked="" type="checkbox"/>	Open	Fire Damaged		Forced
38	If Forced, By Whom?						
39	Trunk Release:	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Unknown <input type="checkbox"/>	Entry To Trunk:	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

Trunk Contents

40	Spare Tire:	Intact	Missing <input checked="" type="checkbox"/>	On Vehicle	Fire Damaged	
41	Tire Change Equipment:	Intact <input type="checkbox"/>	Missing <input type="checkbox"/>	At Scene <input type="checkbox"/>	Engine Compartment	<input type="checkbox"/>
42	Other Contents/Personal Effects In Trunk Compartment/Cargo Area:					
	Φ					

Glass Condition

43	Windshield:	Intact	Missing	Melted/Cracked By Heat <input checked="" type="checkbox"/>	Broken	In	Out
44	Electric Windows:	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>				
45	Driver's Window:	Intact <input type="checkbox"/>	Missing <input type="checkbox"/>	Melted/Cracked By Heat <input checked="" type="checkbox"/>	Broken <input type="checkbox"/>	In <input type="checkbox"/>	Out <input type="checkbox"/>
	Position:	Up <input checked="" type="checkbox"/>	Down <input type="checkbox"/>				
46	Left Rear Window:	Intact <input type="checkbox"/>	Missing <input type="checkbox"/>	Melted/Cracked By Heat <input checked="" type="checkbox"/>	Broken <input type="checkbox"/>	In <input type="checkbox"/>	Out <input type="checkbox"/>
	Position:	Up <input checked="" type="checkbox"/>	Down <input type="checkbox"/>	Stationary <input type="checkbox"/>	Moveable <input type="checkbox"/>		
47	Left Rear 3 rd Window:	Intact <input type="checkbox"/>	Missing <input type="checkbox"/>	Melted/Cracked By Heat <input checked="" type="checkbox"/>	Broken <input type="checkbox"/>	In <input type="checkbox"/>	Out <input type="checkbox"/>
	Position:	Stationary <input checked="" type="checkbox"/>	Moveable <input type="checkbox"/>				
48	Rear Window:	Intact	Missing	Melted/Cracked By Heat <input checked="" type="checkbox"/>	Broken	In	Out
49	Right Rear 3 rd Window:	Intact <input type="checkbox"/>	Missing <input type="checkbox"/>	Melted/Cracked By Heat <input checked="" type="checkbox"/>	Broken <input type="checkbox"/>	In <input type="checkbox"/>	Out <input type="checkbox"/>
	Position:	Stationary <input checked="" type="checkbox"/>	Moveable <input type="checkbox"/>				
50	Right Rear Window:	Intact <input type="checkbox"/>	Missing <input type="checkbox"/>	Melted/Cracked By Heat <input checked="" type="checkbox"/>	Broken <input type="checkbox"/>	In <input type="checkbox"/>	Out <input type="checkbox"/>
	Position:	Up <input checked="" type="checkbox"/>	Down <input type="checkbox"/>	Stationary <input type="checkbox"/>	Moveable <input type="checkbox"/>		

VEHICLE FIRE INVESTIGATION 4

02

Passenger Window: Intact ☐ Missing ☐ Melted/Cracked By Heat ☒ Broken ☐ In ☐ Out ☐
 Position: Up ☒ Down ☐

Sun Roof:	Open		Missing		Closed		Fire Damaged	
Convertible:	Up		Missing		Down		Fire Damaged	
T-Top:	On		Missing				Fire Damaged	
Hard/Soft Top:	On		Missing				Fire Damaged	


* Vehicle

Gasoline <input checked="" type="checkbox"/>	Diesel <input type="checkbox"/>	Natural Gas <input type="checkbox"/>	Electric <input type="checkbox"/>	Hybrid <input type="checkbox"/>
1. Fuel Tank:	Intact	Missing		Fire Damaged
1. Fill Pipe:	Intact	Missing		Fire Damaged
1. Fuel Cap:	Intact	Missing		Fire Damaged
2. Fuel Tank:	Intact	Missing		Fire Damaged
2. Fill Pipe:	Intact	Missing		Fire Damaged
2. Fuel Cap:	Intact	Missing		Fire Damaged
Transmission Pan:	Intact	Missing	Leakage Noted	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Oil Pan:	Intact	Missing	Leakage Noted	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>

10

Areas	Open	Closed	Missing	Rust	Damage	Vandalized	Consumed
Front Bumper:							
Hood:							
Grille:							
Left Fender:							
Driver's Door:		X					
Left Rear (sliding/cargo) Door(s):		X					
Left Quarter Panel:							
Trunk Lid/Tail Gate:							
Rear Cargo Door(s):							
Rear Bumper:							
Roof:							
Right Quarter Panel:							
Right Rear (sliding/cargo) Door(s):		X					
Passenger Door:		X					
Right Fender:							

Body Condition: Excellent ☐ Good ☒ Fair ☐ Poor ☐

Evidence Confiscated: 

Investigated By: 

ical Service Bulletins

Is:

<u>sr</u>	<u>Date</u>	<u>Name</u>
	Aug 00	Campaign - 4R100 Transmission Replacement
	Feb 00	Recall - Revised Child Tether Instructions
	Jan 01	Campaign - Warranty Guide Supplement
	Mar 01	Recall - Driver's Airbag Replacement
	Jul 01	Recall - Outboard Seats Belt May Not Fully Latch
	Aug 01	Recall - Defective Wiper Motor Switch/Gear Cover
00V396000	Nov 00	Recall 00V396000: Child Restraint Anchor Non-Compliance
01V227001	Jul 01	Recall 01V227001: Seat Belt Buckle Defect
01V258000	Aug 01	Recall 01V258000: Wiper Motor Gear Case Cover

Technical Service Bulletins

All Technical Service Bulletins:

Number	Date	Name
00-16-1	Aug 00	A/T - "Prior To Repair" Tag Procedure Notice
00-21-5	Oct 00	Reverse Park Aid - Proximity Sensor Malfunction
00-22-2	Oct 00	Steering - Correct Placement of P/S Pump Bolt/Washer
00-23-10	Nov 00	A/T - In Line Fluid Filter Kit
00B54	Aug 00	Campaign - 4R100 Transmission Replacement
00L11	Feb 00	Recall - Revised Child Tether Instructions
00L12	Jan 01	Campaign - Warranty Guide Supplement
01-10-12	May 01	Wire Harness - Terminal Repair Kit
01-11-7	Jun 01	A/T - 4R70W Delayed Engagement/No Forward Gears
01-12-8	Jun 01	Air Suspension - Lamp ON/DTC's B2140 or C2140 Set
01-13-5	Jul 01	A/T - 4R100 Delayed or No 2nd Gear Shift
01-13-7	Jul 01	A/T - 4R70W Clunk Noise on 2nd to 1st Gear Downshift
01-14-1	Jul 01	Transfer Case - Inadvertent Shifts
01-15-6	Aug 01	Heater Core - Repeated Failure
01-15-7	Aug 01	A/T - Fluid Application Charts
01-18-1	Sep 01	Shift Interlock (BRAKE) - Inadvertent Disabling
01-2-5	Feb 01	Seat Belts - Warning System Operation
01-20-3	Oct 01	Drivability - Vacuum Leak Detection
01-21-5	Oct 01	Engine - High Idle/Sticking Throttle
01-23-6	Nov 01	Engine Coolant - Propylene Glycol Recommendations
01-24-6	Dec 01	Engine - Oil System Priming Procedures
01-25-3	Dec 01	A/C - White Flakes Coming From Vents W/Blower On
01-4-2	Mar 01	Oil Pressure Sending Unit - Drip Shield Interference
01-4-7	Mar 01	Engine - Oil Recommendations/Applications
01-6-2	Apr 01	PATS System - Diagnostic Service Tips
01-7-3	Apr 01	Fuel Pump - Whine Heard Through Radio Speakers
01-7-8	Apr 01	EVAP System - MIL ON Multiple DTC's Set
01-9-7	May 01	Emissions/Computers/Electronics - Drivability Diagnosis
01S10	Mar 01	Recall - Driver's Airbag Replacement
01S21	Jul 01	Recall - Outboard Seats Belt May Not Fully Latch
01S24	Aug 01	Recall - Defective Wiper Motor Switch/Gear Cover
02-1-2	Jan 02	Horn - Weak Alarm System Confirmation Chirp
02-1-4	Jan 02	Engine Head Gasket - Approved Replacement Procedures
02-1-6	Jan 02	Wheels/Tires - Road Force Measurement Equipment
02-1-9	Jan 02	Engine Oil - Oil Recommendations/Applications
NHTSA00V396000	Nov 00	Recall 00V396000: Child Restraint Anchor Non-Compliance
NHTSA01V227001	Jul 01	Recall 01V227001: Seat Belt Buckle Defect
NHTSA01V258000	Aug 01	Recall 01V258000: Wiper Motor Gear Case Cover

02-1493VF



1. Close-up view of the Vehicle Identification Number remaining in the area of the windshield and dash

2. Overall view of the left front



ENC-885-1C1-1875



3. Overall view of the driver's side

4. Close-up view of the left rear





5. Close-up view of the fuel cap, intact

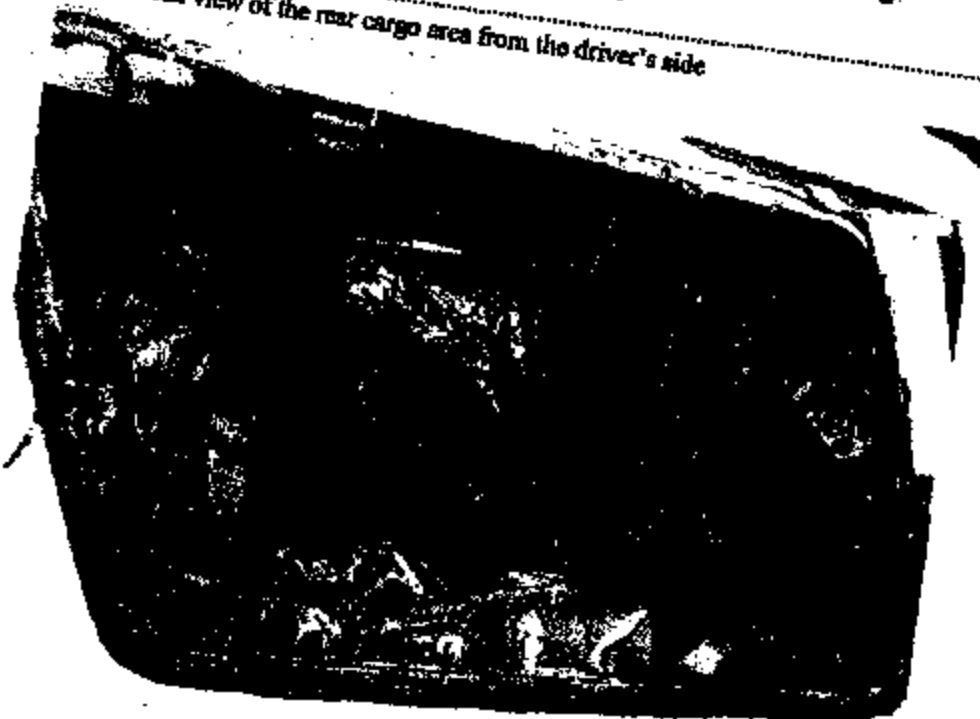
6. Overall view of the rear





9. Overall view of the rear cargo area from the rear

10. Overall view of the rear cargo area from the driver's side





11. Overall view of the rear seats from the driver's side

12. Overall view of the front passenger compartment from the driver's side





13. Overall view of the rear cargo area from the passenger side

14. Overall view of the rear passenger compartment from the passenger side





15. Overall view of the front passenger compartment from the passenger side

16. Close-up view of the ignition cylinder, intact in the off/locked position





17. Overall view of the dashboard

18. Overall view of the engine compartment from the passenger side





21. Overall view of the engine compartment on the passenger side from the front

22. Close-up view of the remains of the custom wheel in the left front





23. Close-up view of the remains of the custom wheel on the right front

24. Overall view of the remains of the power distribution center





25. Overall view of the remains of the wiper motor in the cowl

26. Overall view of the damage present to the front of the engine

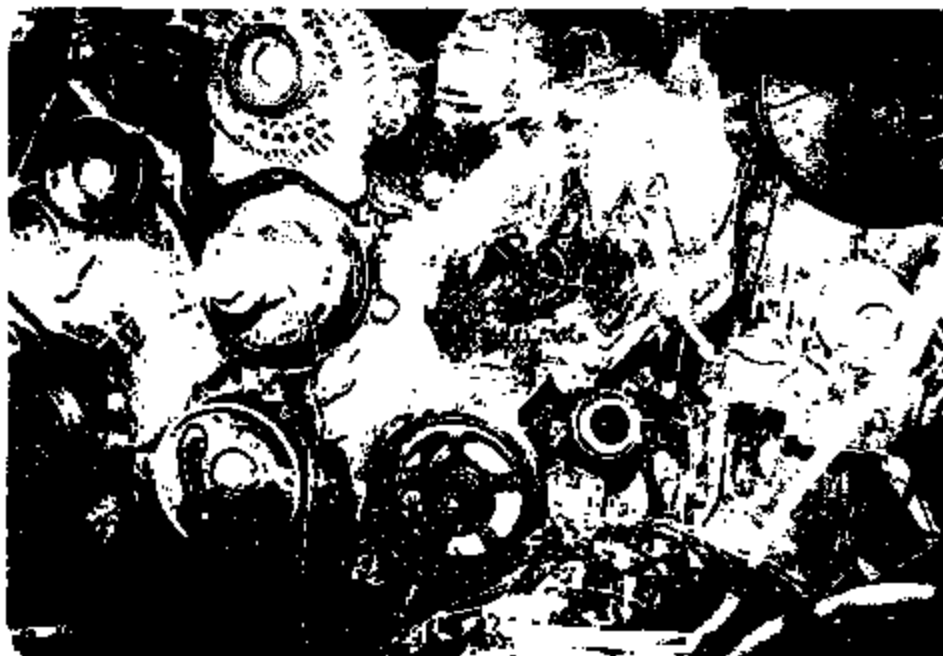




27. Overall view of the valve cover on the right or passenger side

28. Overall view of the fire damage present to the front section of the engine





29. Overall view of damage present to the engine, on the front

30. Overall view of the cable traveling from the power distribution center over the brake booster





31. Overall view of the routing of this cable, which travels from the power distribution center, along the cowl

32. Another overall view depicting this cable traveling across the rear of the engine





33. Overall view of this cable as it travels to the starter solenoid in the right rear

34. Close-up view of this cable having broken while this Investigator was reconstructing same





35. Overall view of the routing of the alternator cable traveling to the starter solenoid in the right rear

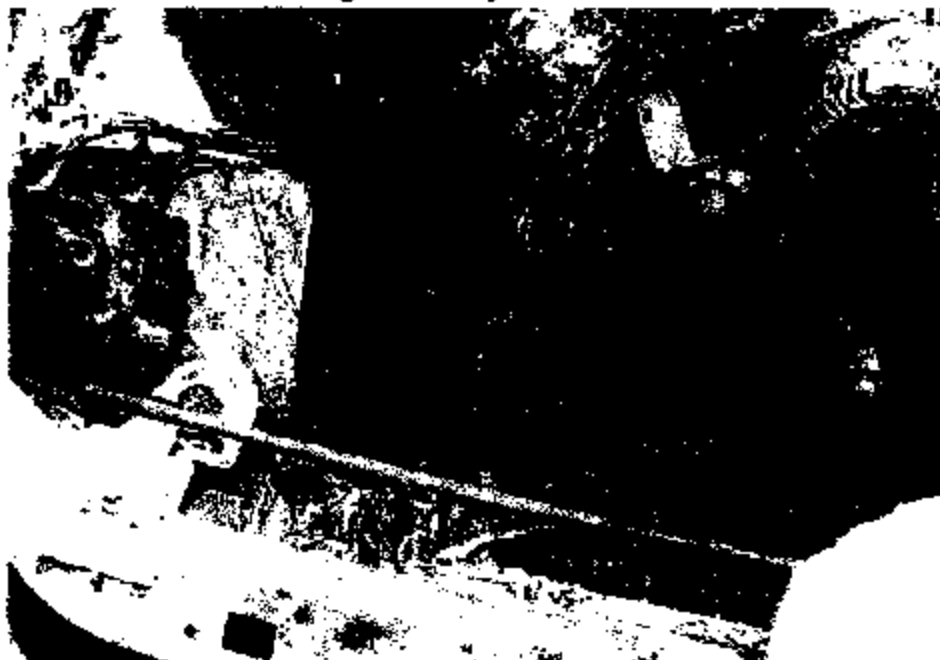
36. Close-up view of the fire damage present to the alternator





37. Close-up view of the remains of battery plates and both cables

38. Overall view of the routing of the battery cables





41. Another extreme close-up view of arcing and fusing present within the alternator cable

42. Extreme close-up view of arcing and fusing present within the alternator cable



SFCHDMA

Issue Detail

08/12/02 08:28:57

VIN: 1FMPU16LX1 Year: 2001 Model: EXPEDITION
Owner Status: ORIGINAL WSD: 09/27/01 Mileage:
Name: Hm Ph:
Trmt: Case: 603401762 Day Ph:
Symptom:
Reason: SPECIAL LIAISON - GENERAL/OTHER
Dealer: ALAN FORD INC
Issue Type: 02 INFORMATION CAN Court: Legal Issue Type:
Issue Status: C CLOSED CAN Award: MORSII Contact: N

A/C DATE Origin Description

07/25/02 CACM10 EXEC REF OUTBOUND CALL TO DEALERSHIP
07/26/02 CACM10 EXEC REF CONCUR WITH DEALERSHIP
07/26/02 CACM10 EXEC REF DOCUMENT ADDITIONAL INFORMATION
07/26/02 CACM10 EXEC REF DOCUMENT ADDITIONAL INFORMATION

F1=Help F2=AddAction F4=ActionDetail F6=DealerInfo
F7=Prev F8=Next F9=viewMORSII F11=Menu F12=Return
NO MORE RECORDS AVAILABLE OGD8427

SFCHADMA

Action Detail

08/12/02 08:29:05

VIN: 1FMPU16LX1L Year: 2001 Model: EXPEDITION
Owner Status: ORIGINAL WSD: 09/27/01
Name: Hm Ph:
Trmt: Case: 603401762 Day Ph:
Symptom Desc:
Reason Desc: SPECIAL LIAISON - GENERAL/OTHER
Dealer: ALAN FORD INC
Issue Type: 02 INFORMATION Issue Status: C CLOSED
Comm Type: PH PHONE Odometer Reading: MI
Analyst: DKAROSS DEBRA KAROSS Document Number:
Action Date: 07/25/02 Action Data: Action Time: 15:38:52 EST
Origin Desc: CRC- PRIORITY GROUP
Action Desc: EXEC REF OUTBOUND CALL TO DEALERSHIP
Comments: CUSTOMER SAYS: PER CUSTOMER, DEALER SAYS: *EXECUTIVE O
FFICES** *EXEC REP, DEBRA 7/25/02 MADE OBC TO JIM LLORENCE
S/M AT ALAN FORD. HE SAID THAT THE VEHICLE MAY BE TAKEN BACK
TO THE BODY SHOP. JIM WILL INVESTIGATE TO SEE IF THE VEHICL
E IS BACK THERE AND GIVE ME ANY INFORMATION HE MAY HAVE. C
AC ADVISED:

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

OGDR427

E085-805-LC1-1894

SFCHADMA

Action Detail

08/12/02 08:29:08

VIN: 1FMPU16LX1 Year: 2001 Model: EXPEDITION
Owner Status: ORIGINAL WSD: 09/27/01
Name: Hm Ph: [REDACTED]
Trmt: Case: 603401762 Day Ph: [REDACTED]
Symptom Desc:
Reason Desc: SPECIAL LIAISON - GENERAL/OTHER
Dealer: ALAN FORD INC
Issue Type: 02 INFORMATION Issue Status: C CLOSED
Comm Type: PH PHONE Odometer Reading: MI
Analyst: DKAROSS DEBRA KAROSS Document Number:
Action Date: 07/26/02 Action Data: Action Time: 14:46:15 EST
Origin Desc: CRC- PRIORITY GROUP
Action Desc: EXEC REF CONCUR WITH DEALERSHIP
Comments: CUSTOMER SAYS: PER CUSTOMER, DEALER SAYS: CAC ADVISE
D: **EXEC REP, DEBRA 7/25/02** SPOKE WITH JIM LLORENCE S/M
OF ALAN FORD REGARDING THE VEHICLE THAT BELONGS MS KUNKLER
CLAIMS THAT AN ALLSTATE INSPECTOR LOOKED AT THE VEHICLE AND
THE CUSTOMER HAS BEEN OFFERED A SETTLEMENT OF \$25,000.00 AN
D THE CUST HAS NOT ACCEPTED THIS OFFER. THIS APPEARS TO BE A

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

OGDB427

SFCHADMA

Action Detail

08/12/02 08:29:10

VIN: 1FMPU16LX1 Year: 2001 Model: EXPEDITION
Owner Status: ORIGINAL WSD: 09/27/01
Name: Hm Ph: [REDACTED]
Trmt: Case: 603401762 Day Ph: [REDACTED]
Symptom Desc:
Reason Desc: SPECIAL LIAISON - GENERAL/OTHER
Dealer: ALAN FORD INC
Issue Type: 02 INFORMATION Issue Status: C CLOSED
Comm Type: PH PHONE Odometer Reading: NI
Analyst: DKAROSS DEBRA KAROSS Document Number:
Action Date: 07/26/02 Action Data: Action Time: 14:46:15 EST
Origin Desc: CRC- PRIORITY GROUP
Action Desc: EXEC REF CONCUR WITH DEALERSHIP
Comments: D THE CUST HAS NOT ACCEPTED THIS OFFER. THIS APPEARS TO BE A
N INSURANCE COMPANY ISSUE.

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

OGDB427

SFCHADMA

Action Detail

08/12/02 08:29:12

VIN: 1FMPU16LX1L Year: 2001 Model: EXPEDITION
Owner Status: ORIGINAL WSD: 08/27/01
Name: Hm Ph: [REDACTED]
Trmt: Case: 603401762 Day Ph: [REDACTED]
Symptom Desc:
Reason Desc: SPECIAL LIAISON - GENERAL/OTHER
Dealer: ALAN FORD INC
Issue Type: 02 INFORMATION Issue Status: C CLOSED
Comm Type: PH PHONE Odometer Reading: MI
Analyst: DKAROSS DEBRA KAROSS Document Number:
Action Date: 07/26/02 Action Data: Action Time: 17:15:19 EST
Origin Desc: CRC- PRIORITY GROUP
Action Desc: EXEC REF DOCUMENT ADDITIONAL INFORMATION
Comments: CUSTOMER SAYS: PER CUSTOMER, DEALER SAYS: CAC ADVISE
D: *EXECUTIVE OFFICES ** EXEC REP, DEBRA 7/26/02** MADE O
BC TO JOYC KUNKLER TO FOLLOW UP ON THIS ISSUE. INFORMED HER
THAT THE ISSUE APPEARS TO BE AN INSURANCE MATTER .HOWEVER TH
E LITIGATION PREVENTION ANALYST ASSIGNED TO THIS FILE HAS NO
T CLOSED OFF THE ISSUE. CUST HAS BEEN ASKING FOR A RENTAL AN

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

OGDB427

SFCHADMA

Action Detail

08/12/02 08:29:13

VIN: 1FMPU16LX1L Year: 2001 Model: EXPEDITION
Owner Status: ORIGINAL WSD: 09/27/01
Name: Hm Ph:
Trmt: Case: 603401762 Day Ph:
Symptom Desc:
Reason Desc: SPECIAL LIAISON - GENERAL/OTHER
Dealer: ALAN FORD INC
Issue Type: 02 INFORMATION Issue Status: C CLOSED
Comm Type: PH PHONE Odometer Reading: MI
Analyst: DKAROSS DEBRA KAROSS Document Number:
Action Date: 07/26/02 Action Data: Action Time: 17:15:19 EST
Origin Desc: CRC- PRIORITY GROUP
Action Desc: EXEC REF DOCUMENT ADDITIONAL INFORMATION
Comments: T CLOSED OFF THE ISSUE. CUST HAS BEEN ASKING FOR A RENTAL AN
D I INFORMED HER THAT UNDER THE CIRCUMSTANCES, FORD WOULD NO
T BE ABLE TO SUPPLY A RENTAL VEHICLE. AS SOON AS I HEAR MOR
E FROM LITIGATION PREVENTION, I WILL LET HER KNOW. **ISSUE
CLOSED***

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

OGDB427

SFCHIDMA

Issue Detail

08/12/02 08:29:23

VIN: 1FMPU16LX1 Year: 2001 Model: EXPEDITION
Owner Status: ORIGINAL WSD: 09/27/01 Mileage: 8000
Name: Hm Ph:
Trmt: Case: 603401762 Day Ph:
Symptom: PANELS/UNIBODY RUST/CORROSION HOOD
Reason: LEGAL - ACCIDENT / FIRE
Dealer: ALAN FORD INC
Issue Type: 07 LEGAL CAN Court: Legal Issue Type:
Issue Status: C CLOSED CAN Award: MORSII Contact: N

A/C DATE Origin Description

06/25/02 CACI38 ADVISE CUST INFORMATION WILL BE SENT TO CONSUMER AFFAIRS
06/26/02 CALGL MAKE OUTBOUND CALL TO CUSTOMER
06/28/02 CALGL REFER TO INSURANCE CARRIER - INSURANCE COMPANY ALREADY INVOL

F1=Help F2=AddAction F4=ActionDetail F6=DealerInfo
F7=Prev F8=Next F9=ViewMORSII F11=Menu F12=Return
NO MORE RECORDS AVAILABLE OGDB427

SFCHADMA

Action Detail

08/12/02 08:29:27

VIN: 1FMPU16LX1 Year: 2001 Model: EXPEDITION
Owner Status: ORIGINAL WSD: 09/27/01
Name: Hm Ph: [REDACTED]
Trmt: Case: 603401762 Day Ph: [REDACTED]
Symptom Desc: PANELS/UNIBODY RUST/CORROSION HOOD
Reason Desc: LEGAL - ACCIDENT / FIRE
Dealer: ALAN FORD INC
Issue Type: 07 LEGAL Issue Status: C CLOSED
Comm Type: PH PHONE Odometer Reading: 8000 MI
Analyst: KMUIRHEA KERRY-ANN MUIRHEAD Document Number:
Action Date: 06/25/02 Action Data: Y Action Time: 16:42:40 EST
Origin Desc: US CONCERN CASE BASE
Action Desc: ADVISE CUST INFORMATION WILL BE SENT TO CONSUMER AFFAIRS
Comments: CUSTOMER SAYS: *- FIRE HAPPENED JUNE 21, 2002 AT 2:30AM -
* THE VEH WAS NOT RUNNING AND THE THE VEH CAUGHT ON FIRE *
- THE LOCATION IS ORTONVILLE MICHIGAN *- CUST FILED CLAIM
WITH THE FIRE DEPARTMENT AND THE STATUS OF THE FINDING IS
THAT THE VEH IS A TOTAL LOSS AND THERE WAS AN ELECTRICAL FAI
LURE THAT CAUSED THE FIRE IN THE VEH CUST IS ALLEGING THERE

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

OGDB427

SFCHADMA

Action Detail

08/12/02 08:29:29

VIN: 1FMPU16LX1 Year: 2001 Model: EXPEDITION
Owner Status: ORIGINAL WSD: 09/27/01
Name: Hm Ph:
Trmt: Case: 603401762 Day Ph:
Symptom Desc: PANELS/UNIBODY RUST/CORROSION HOOD
Reason Desc: LEGAL - ACCIDENT / FIRE
Dealer: ALAN FORD INC
Issue Type: 07 LEGAL Issue Status: C CLOSED
Comm Type: PH PHONE Odometer Reading: 8000 MI
Analyst: KMUIRHEA KERRY-ANN MUIRHEAD Document Number:
Action Date: 06/25/02 Action Data: Y Action Time: 16:42:40 EST
Origin Desc: US CONCERN CASE BASE
Action Desc: ADVISE CUST INFORMATION WILL BE SENT TO CONSUMER AFFAIRS
Comments: LURE THAT CAUSED THE FIRE IN THE VEH CUST IS ALLEGING THERE
IS A DEFECT IN THE VEH AND FORD IS RESPONSIBLE FOR THIS CON
CERN *- CUST FILED A CLAIM WITH INSURANCE AND AN ADJUSTED
NEEDS TO INSPECT THE VEH *- CUST WANTS FORD TO BE AWARE AN
D CUST IS Eeking RENTAL VEH PER CUSTOMER, DEALER SAYS: N
ONE: CAC ADVISED: - I WILL FORWARD THIS INFORMATION TO OUR

F1=Help F2=AddAction F4=PrevAction F5=NextAction F6=ActionData

F9=PrevComments F10=NextComments F11=Menu F12=Return F13=ESP

MORE COMMENTS AVAILABLE

OGDB427

SFCHADMA

Action Detail

08/12/02 08:29:30

VIN: 1FMPU16LX1 [REDACTED] Year: 2001 Model: EXPEDITION
Owner Status: ORIGINAL WSD: 09/27/01
Name: [REDACTED] Hm Ph: [REDACTED]
Trmt: Case: 603401762 Day Ph: [REDACTED]
Symptom Desc: PANELS/UNIBODY RUST/CORROSION HOOD
Reason Desc: LEGAL - ACCIDENT / FIRE
Dealer: ALAN FORD INC
Issue Type: 07 LEGAL Issue Status: C CLOSED
Comm Type: PH PHONE Odometer Reading: 8000 MI
Analyst: KMUIRHEA KERRY-ANN MUIRHEAD Document Number:
Action Date: 06/25/02 Action Data: Y Action Time: 16:42:40 EST
Origin Desc: US CONCERN CASE BASE
Action Desc: ADVISE CUST INFORMATION WILL BE SENT TO CONSUMER AFFAIRS
Comments: ONE: CAC ADVISED: - I WILL FORWARD THIS INFORMATION TO OUR
CONSUMER AFFAIRS GROUP. SOMEBODY FROM CONSUMER AFFAIRS WILL
CONTACT YOU IN 2 BUSINESS DAYS. PLEASE NOTIFY YOUR INSURANCE
CARRIER AND REPORT THIS INCIDENT. *- LOANER I S NOT A
PROVISION OF FOR THIS CONCERN THIS IS AN ISSUE THAT NEEDS T
O BE DEALT WITH INSURANCE COMPANY INFERENCE CASE ID: 5349

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

OGDB427

E005-005-LC1-1182

SFCHADMA

Action Detail

08/12/02 08:29:32

→
VIN: 1FMPU16LX1 [REDACTED] Year: 2001 Model: EXPEDITION
Owner Status: ORIGINAL WSD: 09/27/01
Name: [REDACTED] Hm Ph: [REDACTED]
Trmt: [REDACTED] Case: 603401762 Day Ph: [REDACTED]
Symptom Desc: PANELS/UNIBODY RUST/CORROSION HOOD
Reason Desc: LEGAL - ACCIDENT / FIRE
Dealer: ALAN FORD INC
Issue Type: 07 LEGAL Issue Status: C CLOSED
Comm Type: PH PHONE Odometer Reading: 8000 MI
Analyst: 2224VK VINCE KIRKSEY Document Number:
Action Date: 06/26/02 Action Data: Y Action Time: 10:15:19 EST
Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION
Action Desc: MAKE OUTBOUND CALL TO CUSTOMER
Comments: ***LPA COMMENTS***
LPA MADE OUTBOUND CALL TO THE CUSTOMER BUT THEY WERE NOT
AVAILABLE. LPA WILL RE-CONTACT THE CUSTOMER LATER THIS WEEK
REGARDING HER VEHICLE FIRE.

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

OGDB427

SFCHADMA

Action Detail

08/12/02 08:29:35

VIN: 1FMPU16LX1 [REDACTED] Year: 2001 Model: EXPEDITION
Owner Status: ORIGINAL WSD: 09/27/01
Name: [REDACTED] Hm Ph: [REDACTED]
Trmt: [REDACTED] Case: 603401762 Day Ph: [REDACTED]
Symptom Desc: PANELS/UNIBODY RUST/CORROSION HOOD
Reason Desc: LEGAL - ACCIDENT / FIRE
Dealer: ALAN FORD INC
Issue Type: 07 LEGAL Issue Status: C CLOSED
Comm Type: PH PHONE Odometer Reading: 8000 MI
Analyst: 2224VK VINCE KIRKSEY Document Number:
Action Date: 06/28/02 Action Data: N Action Time: 14:07:17 EST
Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION
Action Desc: REFER TO INSURANCE CARRIER - INSURANCE COMPANY ALREADY INVOL
Comments: ***LPA COMMENTS***

LPA HAS REFERRED THE CUSTOMER BACK TO THEIR INSURANCE DUE TO
THEM ALREADY INVESTIGATING THE MATTER. LPA HAS FORWARDED A
LETTER TO THE CUSTOMER EXPLAINING FMC POSITION IN THE MATTER
AND INDICATING THAT THE REGULAR MANUFACTURER'S WARRANTY HAS
NO PROVISIONS FOR RENTAL VEHICLES. LPA ASKED THE CUSTOMER

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

OGDB427

SFCHADMA

Action Detail

08/12/02 08:29:36

VIN: 1FMPU16LXL Year: 2001 Model: EXPEDITION
Owner Status: ORIGINAL WSD: 08/27/01
Name: Hm Ph:
Trmt: Case: 603401762 Day Ph:
Symptom Desc: PANELS/UNIBODY RUST/CORROSION HOOD
Reason Desc: LEGAL - ACCIDENT / FIRE
Dealer: ALAN FORD INC
Issue Type: 07 LEGAL Issue Status: C CLOSED
Comm Type: PH PHONE Odometer Reading: 8000 MI
Analyst: 2224VK VINCE KIRKSEY Document Number:
Action Date: 06/28/02 Action Data: N Action Time: 14:07:17 EST
Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION
Action Desc: REFER TO INSURANCE CARRIER - INSURANCE COMPANY ALREADY INVOL
Comments: NO PROVISIONS FOR RENTAL VEHICLES. LPA ASKED THE CUSTOMER
CONTINUE WORKING WITH THEIR INSURANCE COMPANY TO ADDRESS
THEIR VEHICLE CONCERNS. NO FURTHER ACTION IS NEEDED TO RESOL
VE.

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

DGDB427

SFCHIDMA

Issue Detail

08/12/02 08:29:46

VIN: 1FMPU16LX11 Year: 2001 Model: EXPEDITION
Owner Status: ORIGINAL WSD: 09/27/01 Mileage: 1
Name: Hm Ph:
Trmt: Case: 603401762 Day Ph:
Symptom:
Reason: LEGAL - CUSTOMER WAITING FOR ACKNOWLEDGEMENT
Dealer: ALAN FORD INC
Issue Type: 02 INFORMATION CAN Court: Legal Issue Type:
Issue Status: C CLOSED CAN Award: MORSII Contact: N

A/C DATE Origin Description

06/27/02 CACI38 CB-IT MAY TAKE 7 DAYS FOR CONSUMER AFFAIRS TO BEGIN INVESTIG
06/28/02 CALGL CREATE CLOSED INFO CONTACT

F1=Help F2=AddAction F4=ActionDetail F6=DealerInfo
F7=Prev F8=Next F9=ViewMORSII F11=Menu F12=Return
NO MORE RECORDS AVAILABLE OGD8427

SFCHADMA

Action Detail

08/12/02 08:29:50

VIN: 1FMPU16LX1 Year: 2001 Model: EXPEDITION
Owner Status: ORIGINAL WSD: 09/27/01
Name: Hm Ph:
Trmt: Case: 603401762 Day Ph:
Symptom Desc:
Reason Desc: LEGAL - CUSTOMER WAITING FOR ACKNOWLEDGEMENT
Dealer: ALAN FORD INC
Issue Type: 02 INFORMATION Issue Status: C CLOSED
Comm Type: ML MAIL Odometer Reading: 1 MI
Analyst: JGUERRER JOSELITO GUERRERO Document Number:
Action Date: 06/27/02 Action Data: Action Time: 16:20:48 EST
Origin Desc: US CONCERN CASE BASE
Action Desc: CB-IT MAY TAKE 7 DAYS FOR CONSUMER AFFAIRS TO BEGIN INVESTIG
Comments: CUSTOMER SAYS: = CUST IS CALLING BACK AND REQUESTING FOR L
OANER VEH = VEH CAUGHT ON FIRE AND TOTALED COMPLETELY = IN
SURANCE COMPANY WONT PROVIDE HER RENTAL AND REQUESTED TO CAL
L US BACK = SHE FEELS THAT ITS FORD FAULT AND WE SHOULD BE
THE ONE PROVIDING RENTAL FOR HER NOTE
== = CUST REQUESTING T OBE CONTACTED BY LEGAL DEPT ON HOME

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

OGD8427

E885-885-LC1-1187

SFCHADMA

Action Detail

08/12/02 08:29:52

VIN: 1FMPU16LX11 Year: 2001 Model: EXPEDITION
Owner Status: ORIGINAL WSD: 09/27/01
Name: Hm Ph:
Trmt: Case: 603401762 Day Ph:
Symptom Desc:
Reason Desc: LEGAL - CUSTOMER WAITING FOR ACKNOWLEDGEMENT
Dealer: ALAN FORD INC
Issue Type: 02 INFORMATION Issue Status: C CLOSED
Comm Type: ML MAIL Odometer Reading: 1 MI
Analyst: JGUERRER JOSELITO GUERRERO Document Number:
Action Date: 06/27/02 Action Data: Action Time: 16:20:48 EST
Origin Desc: US CONCERN CASE BASE
Action Desc: CB-IT MAY TAKE 7 DAYS FOR CONSUMER AFFAIRS TO BEGIN INVESTIG
Comments: = = CUST REQUESTING T OBE CONTACTED BY LEGAL DEPT ON HOME
PH NUMBER 248-745-1720 = THEY CAN CONTACT HER ANYTIME EXCEP
T 1:00 PM TO 5:00 PM TUESDAY AND THURSDAY = FROM MONDAY ,WE
DNESDAY AND FRIDAY,SHE CAN BE REACH ANYTIME PER CUSTOMER, D
EALER SAYS: = NONE CAC ADVISED: - IT MAY TAKE UP TO 7 DA
YS FOR CONSUMER AFFAIRS TO BEGIN AN INVESTIGATION - CONSUME

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

OGDB427

SFCHADMA

Action Detail

08/12/02 08:29:54

VIN: 1FMPU16LX1L Year: 2001 Model: EXPEDITION
Owner Status: ORIGINAL WSD: 09/27/01
Name: Hm Ph: [REDACTED]
Trmt: Case: 603401762 Day Ph: [REDACTED]
Symptom Desc:
Reason Desc: LEGAL - CUSTOMER WAITING FOR ACKNOWLEDGEMENT
Dealer: ALAN FORD INC
Issue Type: 02 INFORMATION Issue Status: C CLOSED
Comm Type: ML MAIL Odometer Reading: 1 MI
Analyst: JGUERRER JOSELITO GUERRERO Document Number:
Action Date: 06/27/02 Action Data: Action Time: 16:20:48 EST
Origin Desc: US CONCERN CASE BASE
Action Desc: CB-IT MAY TAKE 7 DAYS FOR CONSUMER AFFAIRS TO BEGIN INVESTIG
Comments: YS FOR CONSUMER AFFAIRS TO BEGIN AN INVESTIGATION - CONSUME
R AFFAIRS WILL CONTACT YOU BY MAIL OR PHONE - DOCUMENTED IN
FORMATION, ADDED TO PREVIOUS FILE INFERENCE CASE ID: 1572

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

OGDB427

SFCHADMA

Action Detail

08/12/02 08:29:57

⇒
VIN: 1FMPU16LX1 Year: 2001 Model: EXPEDITION
Owner Status: ORIGINAL WSD: 09/27/01
Name: Hm Ph:
Trmt: Case: 603401762 Day Ph:
Symptom Desc:
Reason Desc: LEGAL - CUSTOMER WAITING FOR ACKNOWLEDGEMENT
Dealer: ALAN FORD INC
Issue Type: 02 INFORMATION Issue Status: C CLOSED
Comm Type: ML MAIL Odometer Reading: 1 MI
Analyst: 2224VK VINCE KIRKSEY Document Number:
Action Date: 06/28/02 Action Data: N Action Time: 14:02:22 EST
Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION
Action Desc: CREATE CLOSED INFO CONTACT
Comments: ***LPA COMMENTS***
THE LEGAL DEPT. HAS RECEIVED THE CUSTOMER REQUEST, AND WILL
ADDRESSING THE ISSUE WITH THE CUSTOMER.

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

OGDB427

SFCHDMA

Issue Detail

08/12/02 08:30:05

→

VIN:	1FMPU16LX1L	Year:	2001	Model:	EXPEDITION
Owner Status:	ORIGINAL	WSD:	09/27/01	Mileage:	8000
Name:				Hm Ph:	
Trmt:		Case:	603401762	Day Ph:	
Symptom:	PANELS/UNIBODY ALIGNMENT/FIT				
Reason:	AWA - AWA DENIED				
Dealer:	ALAN FORD INC				
Issue Type:	02	INFORMATION	CAN Court:	Legal Issue Type:	
Issue Status:	C	CLOSED	CAN Award:	MORSII Contact: N	

A/C DATE Origin Description

06/25/02 CACI38 VEHICLE DOES NOT HAVE ANY LOANER PROVISION; NO ASSISTANCE

F1=Help F2=AddAction F4=ActionDetail F6=DealerInfo
F7=Prev F8=Next F9=ViewMORSII F11=Menu F12=Return
NO MORE RECORDS AVAILABLE OGDB427

SFCHADMA

Action Detail

08/12/02 08:30:09

VIN: 1FMPU16LX11 Year: 2001 Model: EXPEDITION
Owner Status: ORIGINAL WSD: 09/27/01
Name: Hm Ph:
Trmt: Case: 603401762 Day Ph:
Symptom Desc: PANELS/UNIBODY ALIGNMENT/FIT
Reason Desc: AWA - AWA DENIED
Dealer: ALAN FORD INC
Issue Type: 02 INFORMATION Issue Status: C CLOSED
Comm Type: PH PHONE Odometer Reading: 8000 MI
Analyst: KMUIRHEA KERRY-ANN MUIRHEAD Document Number:
Action Date: 06/25/02 Action Data: Action Time: 16:42:40 EST
Origin Desc: US CONCERN CASE BASE
Action Desc: VEHICLE DOES NOT HAVE ANY LOANER PROVISION; NO ASSISTANCE
Comments: CUSTOMER SAYS: *- FIRE HAPPENED JUNE 21, 2002 AT 2:30AM -
* THE VEH WAS NOT RUNNING AND THE THE VEH CAUGHT ON FIRE *
- THE LOCATION IS ORTONVILLE MICHIGAN *- CUST FILED CLAIM
WITH THE FIRE DEPARTMENT AND THE STATUS OF THE FINDING IS
THAT THE VEH IS A TOTAL LOSS AND THERE WAS AN ELECTRICAL FAI
LURE THAT CAUSED THE FIRE IN THE VEH CUST IS ALLEGING THERE

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

OGDB427

SFCHADMA

Action Detail

08/12/02 08:30:11

VIN: 1FMPU16LX1L Year: 2001 Model: EXPEDITION
Owner Status: ORIGINAL WSD: 09/27/01
Name: Hm Ph:
Trmt: Case: 603401762 Day Ph:
Symptom Desc: PANELS/UNIBODY ALIGNMENT/FIT
Reason Desc: AWA - AWA DENIED
Dealer: ALAN FORD INC
Issue Type: 02 INFORMATION Issue Status: C CLOSED
Comm Type: PH PHONE Odometer Reading: 8000 MI
Analyst: KMUIRHEA KERRY-ANN MUIRHEAD Document Number:
Action Date: 06/25/02 Action Data: Action Time: 16:42:40 EST
Origin Desc: US CONCERN CASE BASE
Action Desc: VEHICLE DOES NOT HAVE ANY LOANER PROVISION; NO ASSISTANCE
Comments: LURE THAT CAUSED THE FIRE IN THE VEH CUST IS ALLEGING THERE
IS A DEFECT IN THE VEH AND FORD IS RESPONSIBLE FOR THIS CON
CERN *- CUST FILED A CLAIM WITH INSURANCE AND AN ADJUSTED
NEEDS TO INSPECT THE VEH *- CUST WANTS FORD TO BE AWARE AN
D CUST IS SEEKING RENTAL VEH PER CUSTOMER, DEALER SAYS:
CAC ADVISED: - I HAVE RESEARCHED THIS MATTER THIS SITUATI
F1=Help F2=AddAction F4=PrevAction F5=NextAction F6=ActionData
F9=PrevComments F10=NextComments F11=Menu F12=Return F13=ESP
MORE COMMENTS AVAILABLE

OGDB427

SFCHADMA

Action Detail

08/12/02 08:30:12

→
VIN: IFMPU16LX11 Year: 2001 Model: EXPEDITION
Owner Status: ORIGINAL WSD: 09/27/01
Name: Hm Ph: [REDACTED]
Trmt: Case: 603401762 Day Ph: [REDACTED]
Symptom Desc: PANELS/UNIBODY ALIGNMENT/FIT
Reason Desc: AWA - AWA DENIED
Dealer: ALAN FORD INC
Issue Type: 02 INFORMATION Issue Status: C CLOSED
Comm Type: PH PHONE Odometer Reading: 8000 MI
Analyst: KMUIRHEA KERRY-ANN MUIRHEAD Document Number:
Action Date: 06/25/02 Action Data: Action Time: 16:42:40 EST
Origin Desc: US CONCERN CASE BASE
Action Desc: VEHICLE DOES NOT HAVE ANY LOANER PROVISION; NO ASSISTANCE
Comments: CAC ADVISED: - I HAVE RESEARCHED THIS MATTER THIS SITUATI
ON FOR YOU AND UNFORTUNATELY FORD CANNOT PROVIDE ASSISTANCE
FOR THIS MATTER. - PLEASE CONTACT YOUR INSURANCE CARRIER FO
R ADDITIONAL ASSISTANCE. INFERENCE CASE ID: 5378

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

OGDB427

REG-30

02

4/00

FIRE / PROPERTY RECORD

FIRE RESCUE INCIDENT REPORT MIAMI-DADE COUNTY, FLORIDA

UNIT REPORTING SHIFT

343

B

0101 INCIDENT NUMBER 021102 INCIDENT ADDRESS 14260 SW 139 CT

TIME REPORTED

2256

02 FIRST NAME (NAME) MIDDLE INITIAL PROP SEQUENCE 02

STRUCTURE TYPE 12 STORIES HEIGHT 12 SQUARE FEET 3 OCCUPANT TOTAL TYPE 11111 ACTION TAKEN 115

OCCUPANT NAME SPECIFIC PROPERTY 573 MOBILE PROPERTY

OWNER ADDRESS SAME

REPAIRS DAMAGE REPAIRS DAMAGE ON 1ST UNIT ARRIVAL WHEN FIRE OUT COND OFF FIRE FLAME TRAVEL METHOD OBSTACLE TO

FLAME 3 SMOKE 6 SMOKE 6 ON ARRIVAL FACTOR EXTINGUISH CONTROL

DETECTOR TYPE POWER SUPPLY PERFORMANCE SPRINKLER SYSTEM HEADS OPERATED COVERAGE

REPAIRS DAMAGE REPAIRS DAMAGE DOWNED TO FIRMING COMPANY

YEAR MAKE MODEL YEAR STATE VINS

EQUIPMENT INVOLVED FORM MATERIAL IGNITED TYPE MATERIAL IGNITED

18 AD EQUIPT 69 EQUIPT 43 PLASTIC

FORM HEAT IGNITION IGNITION FACTOR ESTIMATED LOSS

89 HOSTILE 93 EXPOSURE 5000

AREA OF ORIGIN LEVEL ORIGIN FINE CONTENTS

47 VEHICLE STOR 31 GRADE +9' 20000

INVESTIGATOR 4 2/1/02

INVESTIGATED BY

FIRE HOSE (NO) 1" 2" 3" 4" 5" 6" 8" 10" 12" 14" 16" 18" 20" 22" 24" 26" 28" 30" 32" 34" 36" 38" 40" 42" 44" 46" 48" 50" 52" 54" 56" 58" 60" 62" 64" 66" 68" 70" 72" 74" 76" 78" 80" 82" 84" 86" 88" 90" 92" 94" 96" 98" 100"

GROUND AERIAL LADDERS LADDERS FIRE RELATED CASUALTIES FIRE DEPT SUPPORT OTHER PERSONNEL PERSONNEL PERSONNEL

02 INJURY DEATH

PERSONNEL OF UNIT REPORTING RICHARD G BOND R GRUNWALD M CONDEMAN B 2/1/02

DAMAGE HOUSE DAMAGE FROM EXPOSURE FIRE DAMAGE RESTRIKAL AUTO REPAIR EQUIPT INSIDE STRUCTURE

DAMAGE HOUSE DAMAGE FROM EXPOSURE FIRE DAMAGE RESTRIKAL AUTO REPAIR EQUIPT INSIDE STRUCTURE

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DAMAGE HOUSE DAMAGE FROM EXPOSURE FIRE DAMAGE RESTRIKAL AUTO REPAIR EQUIPT INSIDE STRUCTURE

FD-205-005-LC1-1115

All Action Details for Issue

FORD MOTOR COMPANY RECEIVED AUG 6 2002	VIN: 1FMRU17L2W	Year: 1998	Model: EXPEDITION	Case: 524000532
	Name: [REDACTED]	Owner Status: Subsequent	WSD: 1998-02-25	
	System Desc: FIRE/SMOKE VISIBLE FLAME UNDERHOOD		Primary Phone: [REDACTED]	
	Reason Desc: LEGAL - ALLEGED - NON-SERIOUS INJURY		Secondary Phone: [REDACTED]	
	Issue Type: 07 LEGAL	Issue Status: CLOSED		
Action: INJURY; ADVISE CUST INFORMATION WILL BE FORWARDED TO CONSUMER AFF				
Dealer: 04820 WORLD FORD/KENDALL				
Odometer: 83174 MI				
Analyst Name: MICHELLE SUTHERLAND				
Action Date: 03/01/2002				
Comm Type: MAIL				
Analyst: MSUTHER				
Action Time: 11:56 AM				
Action Date: No				
Origin Desc: US CONCERN CASE BASE				
Caller Information If Different From Vehicle Owner:				
First Name Middle Initial Last Name Day Phone Relationship				

Comments CUSTOMER SAYS: >> VEH HAD ELECTRICAL FIRE >> FIRE INVESTIGATOR TEAM WOULD LIKE TO IMPOUND THE VEH >> DAMAGE WAS DONE TO THE BUSINESS - >> HAVE CONTACTED INSURANCE COMPANY - HAVE NOT STATED STATUS OF CLAIM >> FIRE INVESTIGATOR SAID ELECTRICAL PROBLEM >> AMERICAN AUTOMOTIVE ENGINEERING - IS THE NAME OF CUST STORE - IN MIAMI >> FIRE TOOK PLACE 2/11/02 >> POLICE REPORT # IS >> 819328 - MIAMI >> FIRE INVESTIGATOR # >> 2022675 (FIRE RESCUE DEPT) >> CASE NUMBER IS # 0204174 - INSURANCE PER CUSTOMER, DEALER SAYS: >> NONE << CAC ADVISED: - THIS INFORMATION WILL BE FORWARDED TO OUR CONSUMER AFFAIRS OFFICE. SOMEBODY WILL CONTACT IN TWO BUSINESS DAYS. INFERENCE CASE ID: 8341

Action: SEND ACKNOWLEDGEMENT LETTER TO CUSTOMER
 Dealer: 04820 WORLD FORD/KENDALL
 Odometer: 83174 MI
 Analyst Name: CASSANDR JONES
 Action Date: 03/01/2002
 Comments CUST IS UNSATISFIED WITH THE \$ AMOUNT OF SETTLEMENT WITH INSURANCE CO. CUST MUST GO THROUGH SUBROGATION WITH INSURANCE CO. LPA PROPOSES NO FURTHER ACTION.

Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION

Comm Type: MAIL

Analyst: CJONES

Action Time: 1:44 PM

Action Date: Yes

Data Element Name

Data Value

CERTIFIED LETTER #

Action: FINAL CASE DISPOSITION
 Dealer: 04820 WORLD FORD/KENDALL
 Odometer: 83174 MI
 Analyst Name: CASSANDR JONES
 Action Date: 03/27/2002
 Comments LETTER SENT TO CUST ADVISING OF SUBROGATION.

Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION

Comm Type: MAIL

Analyst: CJONES

Action Time: 8:48 AM

Action Date: No

E885-005-101-1316

18/02

Action: UPDATE/ADDCO CASE
Dealer: 04820 WORLD FORD/KENDALL

Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION

Odokurter: 65174 MI
Analyst Name: CASSANDR JONES
Action Date: 06/18/2002

Comm Type: MAIL
Analyst: CJONES
Action Time: 9:33 AM

Action Date: No

Comments: CUST HAS HIRED AN ATTORNEY. DAMAGES TO THE VEHICLE AS WELL AS TO THE REPAIR SHOP THE VEHICLE WAS IN WAS IN EXCESS OF 25,000 DOLLARS. DUE TO THE AMOUNT OF DAMAGES, SENDING OVER TO OGC FOR REVIEW. IN THE INTERIM, THE ATTY WILL BE SENDING OVER EXACT REPAIR ESTIMATES AND POLICE REPORTS WHEN THEY BECOME AVAILABLE.

EX-106-151-1117

6/18/02

LAW OFFICES

Andrew B. Sapiro

8525 S.W. 32nd Street - Suite B-4
Oak Plaza Professional Center
Miami, Florida 33156

Telephone: (305) 586-1800

Facsimile: (305) 270-0557

October 21, 2002

Ford Motor Company
Park Lane Towers West
Suite 300
Three Parklane Blvd.
Dearborn, Michigan 48126

My Client: [REDACTED]
Vehicle: 1998 Ford Expedition
VIN: 1FMRU17L2WA [REDACTED]
Analyst: Shawn Norton

Dear Mr. Norton:

This package is in response to your letter of August 12, 2002.
The enclosures include:

1. Metro-Dade County fire damage report;
2. Report and attachments of Crash Recorder Consulting, Inc., dated September 4, 2002;
3. Damage estimate invoice sheets prepared by David Lee of American Automotive and an associated parts catalog;
4. Selected damage photographs
5. CNA Insurance Company, as subrogee of [REDACTED] Inc. pleadings.

The fire damage report and the report of Crash Recorder Consulting, Inc. will address most of the questions contained in your August 12 correspondence. For purposes of this investigation, you can assume that at the time of the fire, the keys were in the ignition of the motor vehicle, in the off ignition position.

Limited information is available on the vehicle, as it was owned by a third party. I enclose a copy of a vehicle printout from the State of Florida. The owner of the vehicle, David Chance, has retained separate counsel, and is presumably available to give a statement with respect to the service history of the vehicle.

I have spoken with Mr. Chance, who informs me that there are no after market additions or modifications to this vehicle. This was confirmed in the inspection performed by our expert.

Our expert concludes that the subject Expedition caught fire due to faulty original equipment wiring. There was no evidence of any vehicle modification or tampering that suggests a separate or different cause of the fire.

The vehicle remains under cover in [redacted] automotive garage and is available for inspection. Our expert has requested to be present during any inspection requested by Ford Motor Company. Note that while our expert inspection was thorough, no attempt was made to take apart or disassemble any portion of the Expedition. The vehicle is therefore available for inspection in the condition found after the fire was extinguished.

You may also note at the conclusion of our expert's report a lengthy series of similar Complaints filed against similar Ford vehicles. We take the position that the vehicle fire was due to a defect known to Ford, and therefore Ford's responsibility.

The fire in question caused extensive damage to the business premises of American Automotive Engineering. The heat of the fire damaged or destroyed shop equipment costing in excess of \$100,000 dollars. [redacted] damage claim includes the loss of equipment and business furnishings. There are numerous photographs available depicting damage to the shop, and close up photographs of damage to individual pieces of equipment. Selected photos are enclosed on disc. All of the photographs may be viewed when Ford schedules the inspection of the subject vehicle.

The damage claim of [redacted] is broken down into several elements. The loss of hand tools is itemized in a five page inventory. The individual items can be found in the corresponding pages of the enclosed snap-on catalog. The prices for each item were obtained from [redacted] local Snap-on representative, and are current replacement prices. These can all presumably be verified through any Snap-on representative nationally.

The handtools in question all need to be replaced. They were all ruined, as a result of damage from the heat of the fire or the chemical used to extinguish the fire. Individual handtools, such as wrenches, for instance, all lost their finish and are no longer safe to use. They now lack strength and integrity and can no longer be warranted by Snap-on.

The damage inventory includes essential shop equipment, such as the vehicle lifts, which were severely damaged. While most of the shop records were burned or destroyed in the fire, [REDACTED] has photographs to document the presence of, and damage to, the various items identified in his inventory.

In addition to his claim for damages, my client also must now defend a subrogation action filed by the insurance carrier for the building owner/landlord. Enclosed for your review is the Complaint filed and served against American Automotive by CNA Insurance Company, as subrogee of Bill Eisner, Inc.. The Answer is also enclosed. It is now apparent that the defense of this claim will require the filing of a third party action against Ford in the next 30 days. This action will include our claim for damages.

Please call my office to arrange an inspection of the vehicle in the shop, hopefully with an eye towards resolving my client's damage claim.

Thank you in advance for your attention to this matter.

Very truly yours,



Andrew B. Sapiro

ABS/sm

cc: Patrick Goss, Esq.

Crash Recorder Consulting, Inc.

22064 Greenwich Court West
Boca Raton, Florida 33428
Tel: 561-350-7334

September 4, 2002

Mr. David Lee
American Automotive Engineering
14280 S.W. 139th Court
Miami, Florida 33186
Tel: 305-255-1160
Fax: 305-255-1163

Re: 1998 Ford Expedition VIN 1FMRU17L2WL [REDACTED]
Crash Recorder Consulting File No. 2049

Dear [REDACTED]

Pursuant to your request, Crash Recorder Consulting, Inc. (CRC) performed an analysis involving the cause of the fire this vehicle sustained. In order to perform this analysis CRC researched, reviewed, inspected, and/or discussed this matter with the following.

- Inspection and photographic documentation of subject Ford Expedition VIN 1FMRU17L2WL [REDACTED]
- Inspection of exemplar Ford Expedition VIN 1FMRU17L6W [REDACTED]
- NHTSA Consumer Complaints of Ford Expeditions from 1997 through 2002 model year.
- NHTSA Recall information for Ford Expeditions from 1997 to 2002
- Inspection of photographs of facility taken the day of loss.
- Interview with [REDACTED]

According to information supplied by [REDACTED] the subject vehicle was towed into his facility for a problem involving the shift interlock. There were 65,000+ miles showing on the odometer. The vehicle started normally, remained running, and had no indication of battery drain or other electrical malfunctions that would necessitate disconnecting the vehicle battery. Disconnecting electrical power is not a standard procedure for vehicles with this type of customer complaint.

At approximately 11 PM, 5 hours after the vehicle was parked inside the American Automotive Engineering facility, alarms sounded indicating a problem in the building. Upon arrival to the facility a few minutes later, [REDACTED] found the building engulfed in heavy smoke. Fire crews later reported that the front of the subject Expedition was on fire and the fire was quickly extinguished. The resulting smoke and heat of the fire caused considerable damage to the facility, and its contents.

Inspection of the subject vehicle showed the greatest concentration of heat to be on the left side of the engine compartment, near the main fuse panel. This assessment is based on the following evidence.

- The only remaining portion of the hood is located over the battery on the right side of the engine compartment.
- The brake master cylinder, which is located to the immediate right of the main fuse panel, had the aluminum housing completely melted away. Aluminum components of similar construction farther away from the fuse panel show signs of heat deformity, but are mostly intact and recognizable.
- The left front tire is the only tire that went away during the fire. The right front tire which is located under the battery was not exposed to temperatures high enough to destroy it.
- The main wire harness bundle connecting the under hood fuse panel, through the vehicle fire wall, to the dashboard is completely destroyed as well as the entire dashboard.
- The steering wheel was not completely consumed and still retains the airbag as well as some padding, indicating that the primary source of heat was farther away than the instrument cluster.

There is no indication of any non factory equipment including sound or video equipment, being added to this vehicle. The battery terminals do not appear to be mutilated, and do not have any aftermarket leads attached to them. There are no aftermarket wires running from the engine compartment to the passenger compartment indicating the addition of supplemental electrical accessories. No aftermarket engine performance parts were observed to be installed.

An exemplar Expedition built 4 months after the subject vehicle was also in the facility for repair of its rear leveling suspension. This vehicle activated its self leveling suspension pump 25 minutes after the ignition was shut off, while it was unattended. This pump activation reoccurred 5 minutes later in the same configuration. While the subject truck did not have any indication of a problem with its suspension the exemplar vehicle provided an excellent example of how these vehicles can activate circuits without any action of an operator. It is possible that the subject vehicle had a electrical circuit activate, malfunction, overheat, and start melting the insulation off its affected wiring. This problem would also directly affect any wires within the immediate vicinity. As the affected wires insulation melted away, these now un-insulated wires were able to make

contact with, and provide an ignition source for any combustible materials under the hood and dashboard.

Review of the National Highway Traffic Safety Administration's website revealed numerous consumer complaints involving fires in these vehicles. Fires and electrical failures have resulted from problems with their instrument clusters, radios, fuse boxes, windshield wipers, air conditioners, and fuel leaks. Due to the delayed nature of this fire, as well as the pattern of damage, the fuel line failures are not a suspected cause in this vehicle's case. Any of the electrical components could have resulted in the wiring overload that resulted in this fire.

The initial source of electrical circuit overload will not be determinable without further inspection that would require the disassembly and subsequent disruption of the vehicle from its current condition. Due to the severity of the damage this subsequent inspection may not reveal a specific cause that can be identified further than the known preexisting problems with other similar vehicles.

Summary and Opinion

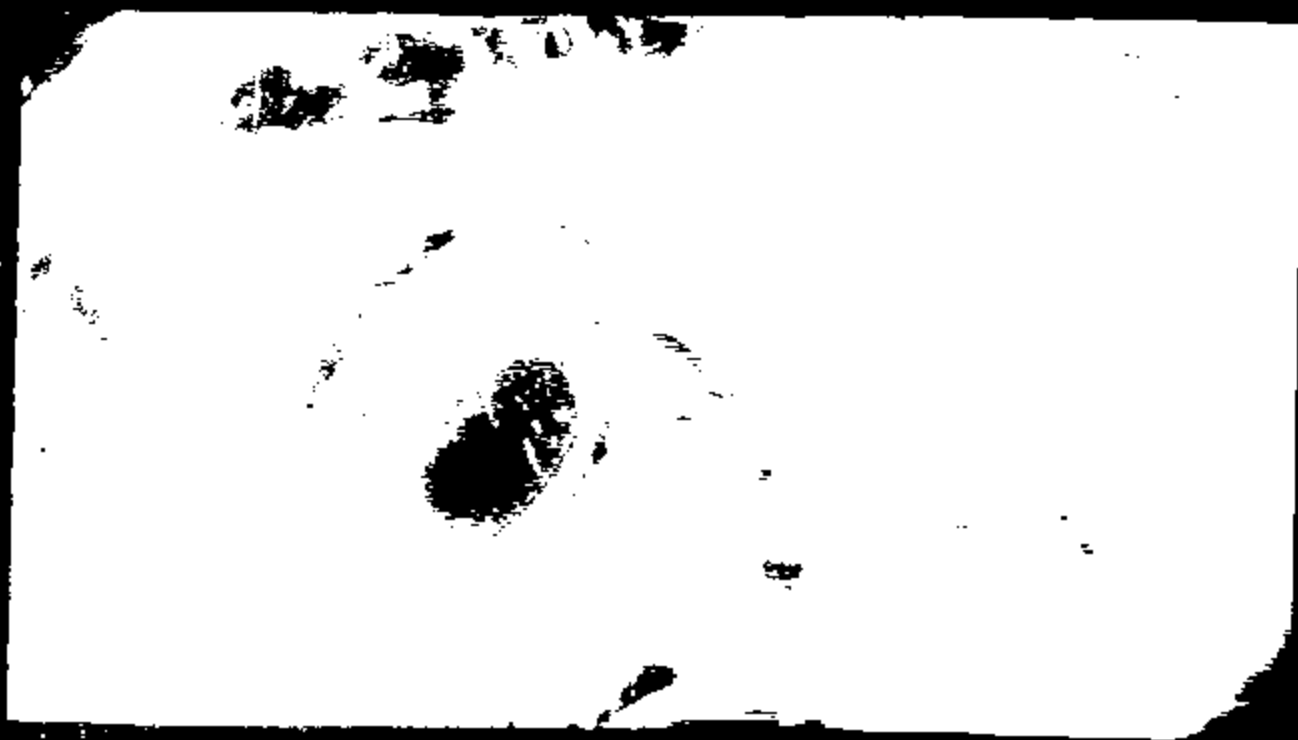
Based on this review of evidence and material, CRC has reached the opinion that the fire in the subject Expedition was caused by faulty original equipment wiring. There is no indication that the vehicle was modified, tampered with, or abused in any way that could have resulted in this fire starting.

Opinions expressed in this report are based on information available at this time. If additional materials become available CRC reserves the right to update opinions. If you have questions regarding this analysis, please contact me so that we can discuss this material.

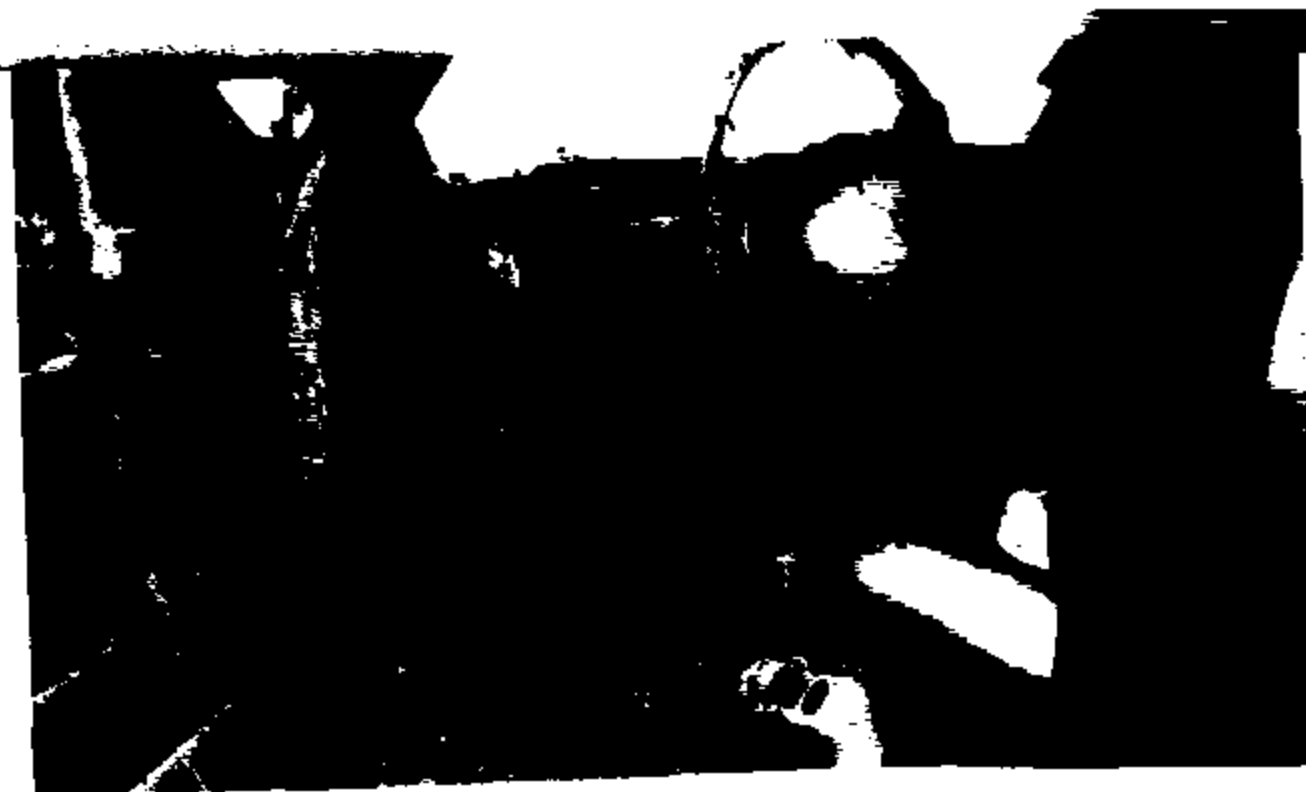
Sincerely,



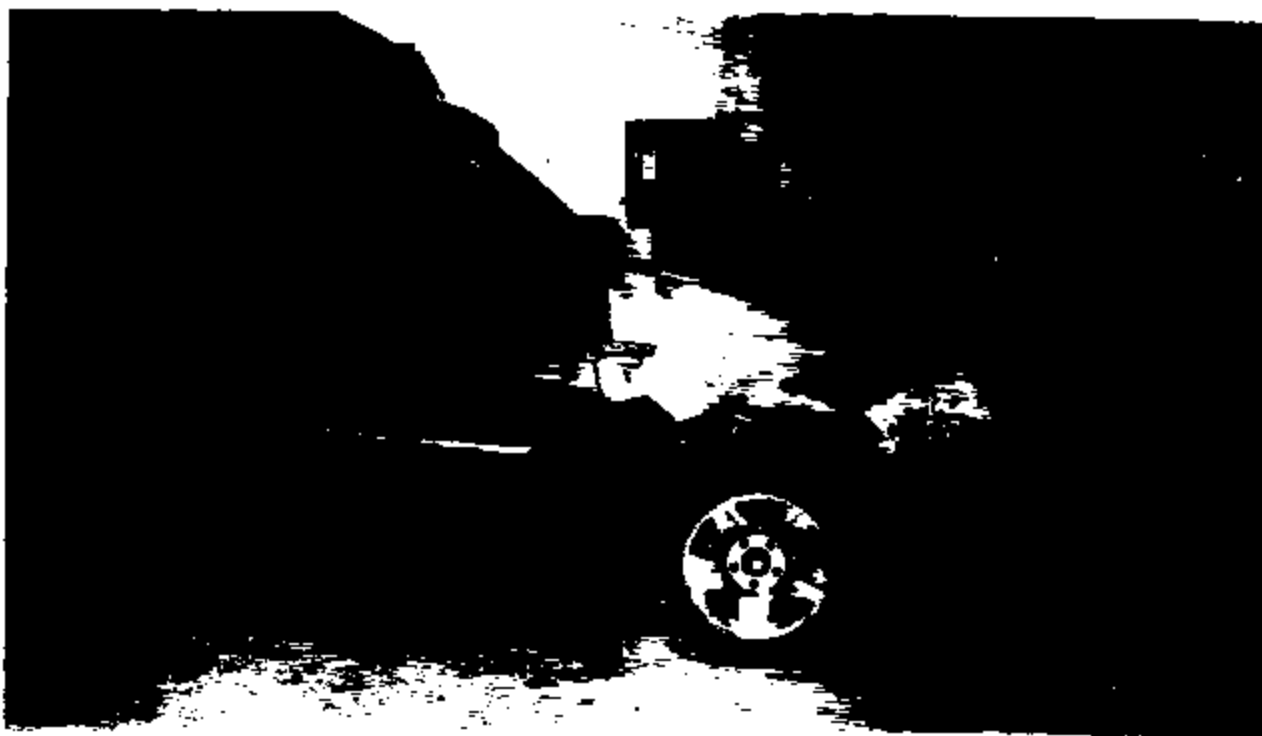
Jay Vitagliano
CRC President



ERG-002-LC1-1124



6885-885-1C1-1125



EROS-005-LC1-1127



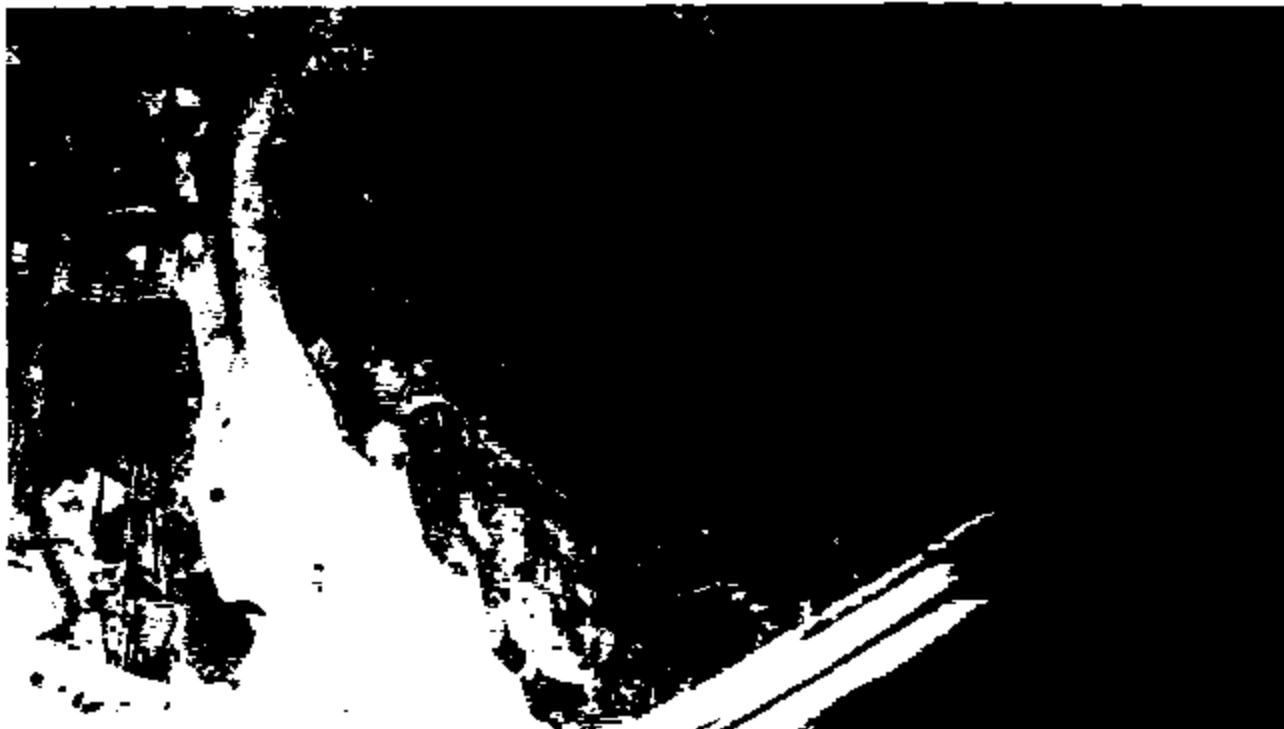
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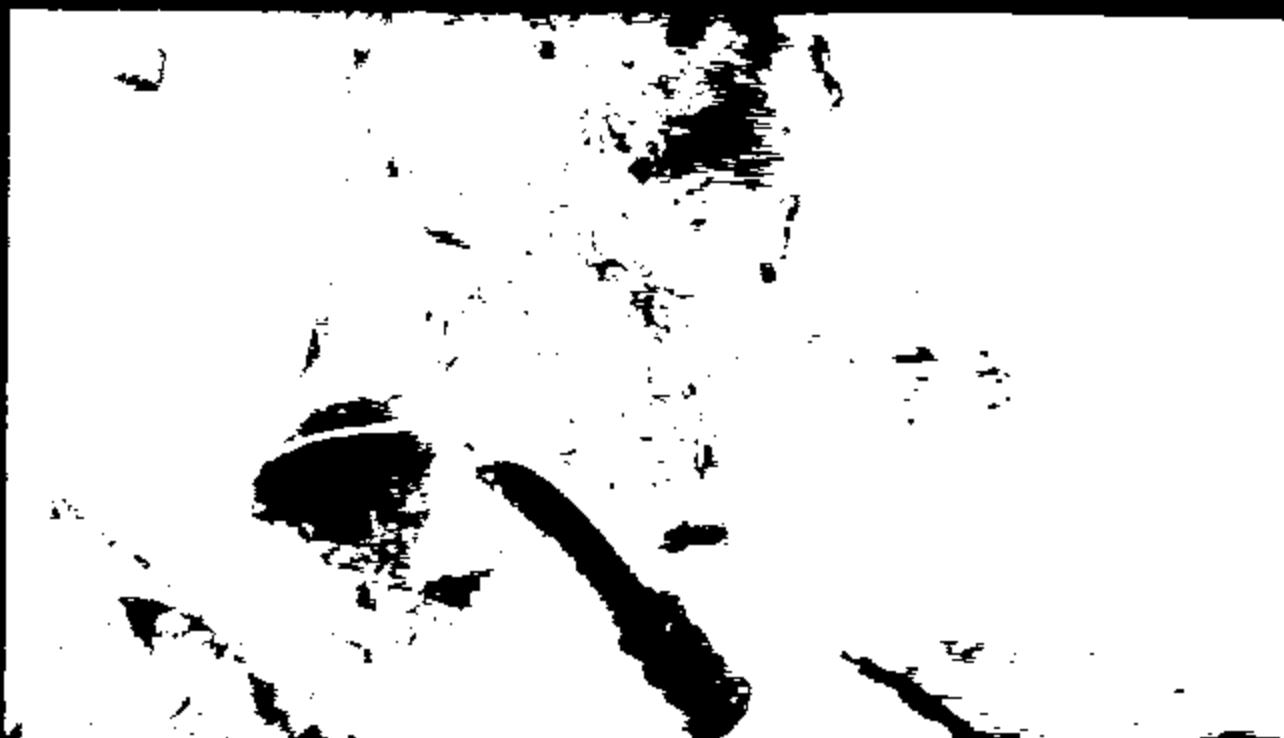
ENG-000-L01-1129



ED05-085-LC1-1138



2005-065-1C1-1131

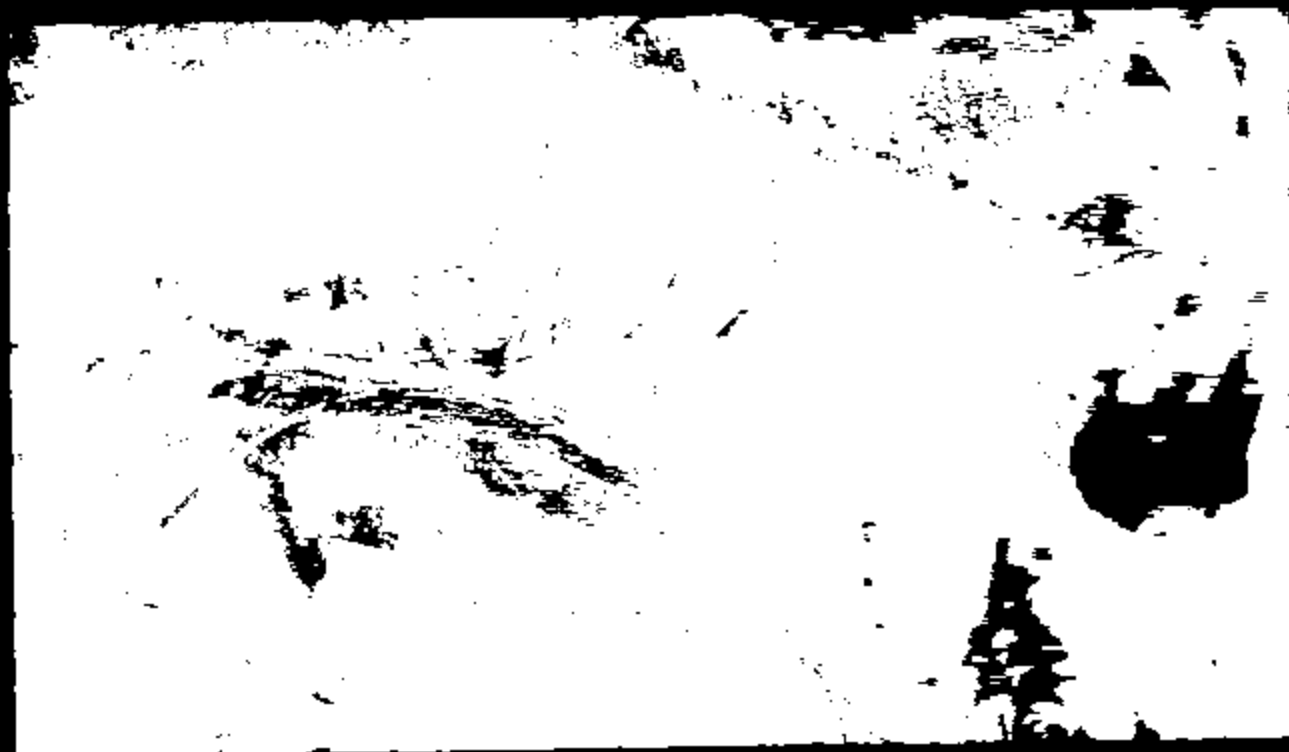


EA85-605-LC1-1132





6025-025-LC1-1134



2025-005-LC1-1135



EROS-205-LC1-1138



USAA CASUALTY INSURANCE COMPANY
9800 Fredericksburg Road, San Antonio, TX 78288

CERTIFIED NO. 71792860 1160 00450326
RETURN RECEIPT REQUESTED

FORD MOTOR COMPANY
FORD MOTOR COMPANY
1-T ALMERICAN ROAD
DEARBORN MI 48126-2798

September 24, 2003

Policyholder: [REDACTED]
Reference Number: 2458154-7102-4-7951
Date Of Loss: September 13, 2003
Loss Location: Hartwell, Georgia
USAA Tax ID Number: [REDACTED]
Your Policyholder: [REDACTED]
Your Reference Number: unknown

OCT 02 2003

To whom it may concern:

This is to notify you of an explosion of a 2003 Ford Expedition that occurred while the vehicle was parked and unoccupied. Please call me to arrange for a joint inspection.

This is to notify you of our subrogation interests and to request that you not make any settlements on this claim without protecting our recovery rights. The exact amount of our claim and supporting documentation will follow separately.

If you wish to discuss this matter, please contact me.

Sincerely,

Carol Maberry

Carol Maberry
Senior Claims Representative
Southeast Regional Office
Phone: 1-800-531-8222 Ext. 43246
Fax Phone: 1-800-531-8877

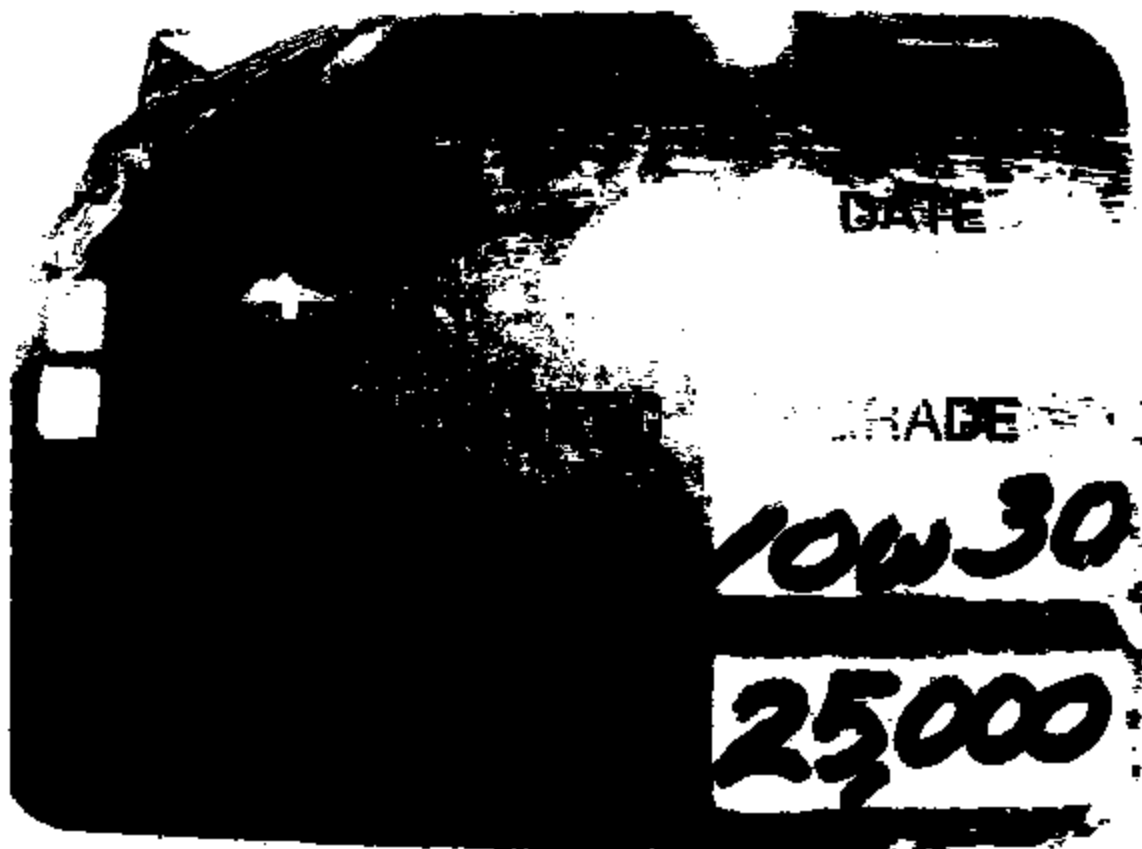
2458154 - 4 - GA - 09/13/03 - 7951 - 2 - A109

** TOTAL PAGE.02 **

2003-003-101-1137



8905-665-L01-1138





1/17/51
AT 241 KPa/35

TIRE'S
RIMS
PSI COLD

CABLE FEDERAL MOTOR
ON THE DATE OF

279611

F0231
T0267



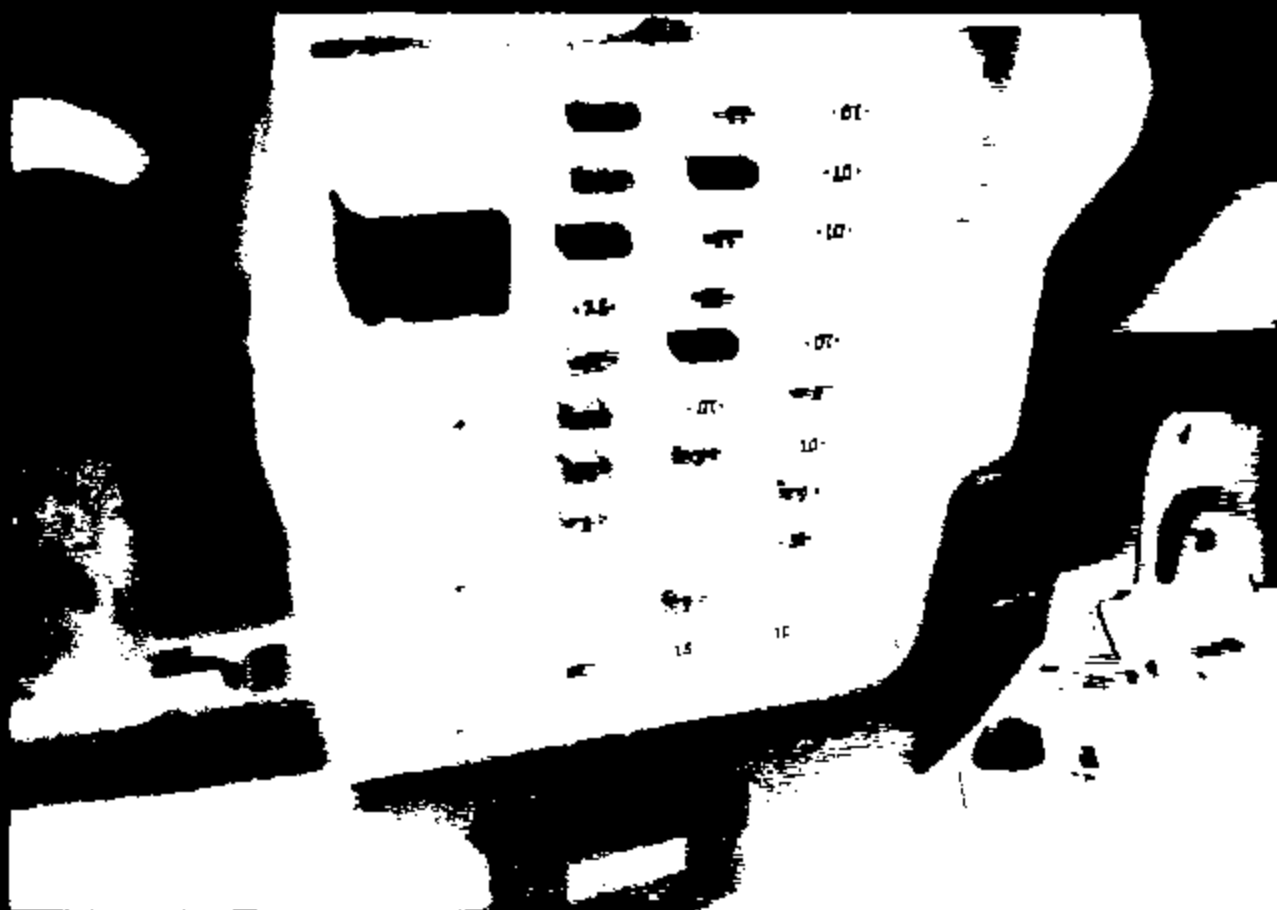
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EROS-885-LC1-1141











EA85-885-LC1-1147



2025-202-LC1-1148





DA05-005-LC1-1148



EA25-868-LC1-1159



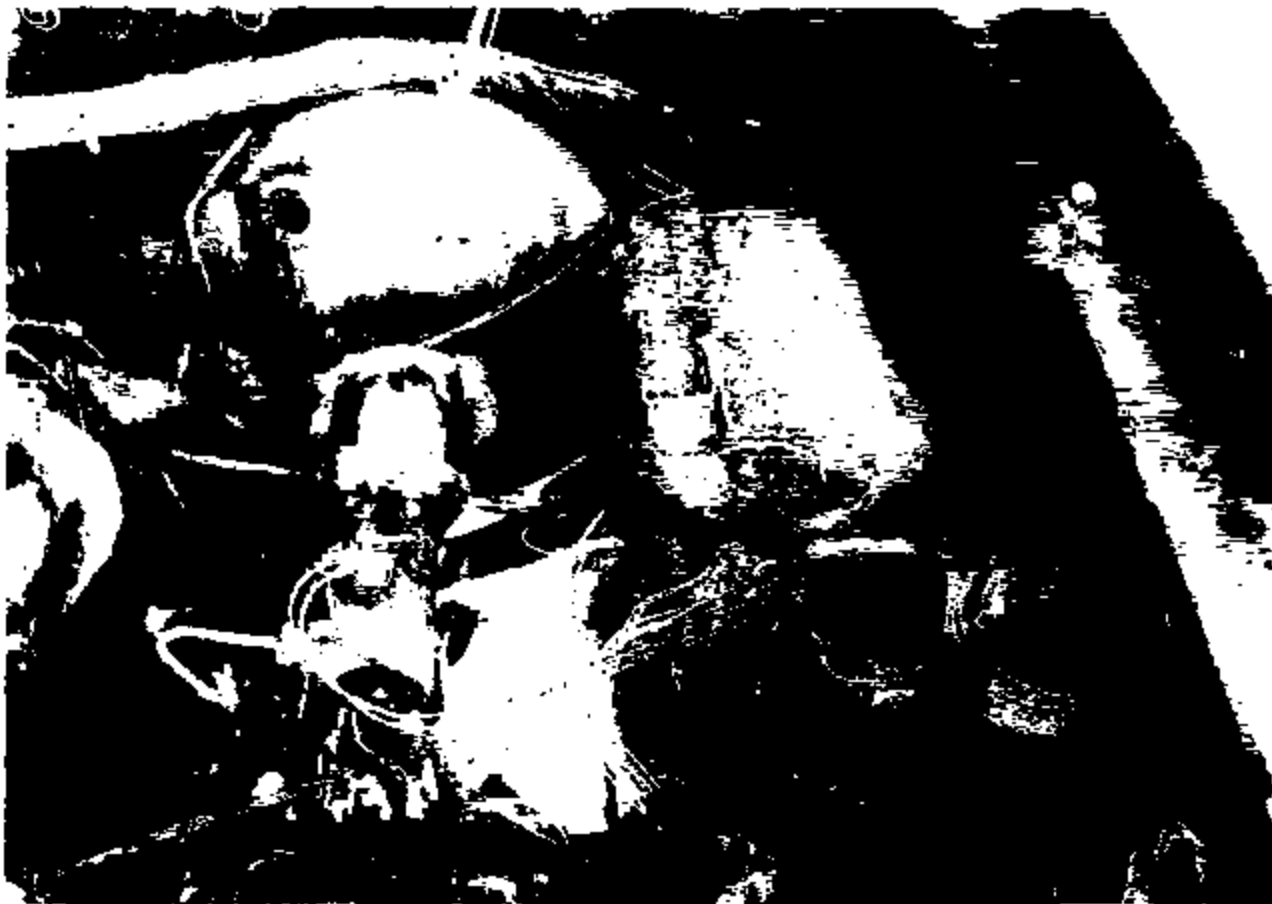


ENC-005-LC1-1152





2005-006-LC1-1154





EGG-285-1C1-1158



ER63-003-LC1-1157



USAA CASUALTY INSURANCE COMPANY
9800 Fredericksburg Road, San Antonio, TX 78288

SHAWN L. NORTON
FORD MOTOR COMPANY
PARKLANE TOWERS WEST
SUITE 300
THREE PARKLANE BOULEVARD
DEARBORN, MICHIGAN 48126-2568

RECEIVED DEC 1 2003

November 18, 2003

Policyholder: [REDACTED]
Reference Number: [REDACTED]
Date Of Loss: September 13, 2003
Loss Location: Hartwell, Georgia

Dear Mr. Norton:

In order to assist you in evaluating this claim, I have provided the information you requested.

1. Description of the incident: On 9-13-2003 our insured drove approximately 300 yards from his home to the Hartwell Marina in Hartwell, Georgia. Our insured parked his 2002 Ford Expedition, removed the keys and locked the vehicle. Approximately 45 minutes later, while our insured was on his jet ski, he noticed smoke and firemen in the parking lot of the marina. Our insured went to investigate and saw his vehicle was on fire. The marina employees has spent 4 extinguishers after calling the fire department. Comments from the firemen were that it looked like an electrical fire that started in the fuse box area and crept up the wiring column into the dash area spreading into the engine. The marina employees said flames were coming from the fuse box area.

2. A copy of the fire report is enclosed

3. The mileage at the time of the incident was approximately 24,000 miles.

4. Pictures taken at the scene are enclosed.

5. In the Origin and Cause report, electrically generated heat from an undetermined malfunction is the only cause that cannot be ruled out.

6. The Origin and Cause report is enclosed.

7. The salvage location: Auto Auctions 125 Old Highway 138
Loganville, Georgia 30249-4814 770-784-5767 Fax 770-787-4168

2458154 - 4 - GA - 09/13/03 - 7951 - 2 - C200

ER05-005-1C1-1158

The vehicle has been shrink wrapped to preserve the evidence with a legal hold placed on the vehicle

8. The vehicle is a total loss. The appraisal is enclosed.
9. Our insured states all service was done at your dealership where the vehicle was leased new.

University Ford-Mazda 4200 Atlanta Highway Bogart, Georgia 30622
708-546-7200

I am enclosing the only service record we have - see attached.

10. No aftermarket equipment.
11. The engine was not running.
12. The keys were not in the ignition.

13. The vehicle was leased new from University Ford at above address.

Please contact my office to coordinate the inspection of this vehicle.

Sincerely,

Carol Maherry

Carol Maherry
Senior Claims Representative
Southeast Regional Office
Phone: 1-800-531-8222 Ext. 43246
Fax Phone: 1-800-531-8877

HART COUNTY FIRE DEPARTMENT INCIDENT FIELD REPORT

FDID 07301 Date: 9-17-17 Exposure: Yes/No Yes Alarm Time: 11:27 Clear Time: 10:47 Trip # 5
 Responding Station 6714 Units Responded C-4 C-5 Others _____
 Correct Address: _____ City: HARTWELL GA
 Firefighter / Civilian _____ DOB _____

TYPE OF INCIDENT (Circle)

Fire (Type) Structure Grass Woods Brush Accident Fire Alarm Other _____
 Occupant Name _____ Phone #: _____
 Owner Name: _____ Address: _____ Phone #: _____

TYPE OF PROPERTY (Circle)

Residence Business Church Education Farm Road Open Land Timber Corps Land Other HART

ACTIONS TAKEN (Circle)

Extinguish Rescue Investigate Remove Hazard Stand By Salvage Mutual Aide Other _____

GRASS FIELD HAY WOODS OR BRUSH FIRE

What burned? Grass Brush Trash Woods Crop (or) Type of Crop _____ # of Bales _____
 Value _____ Acres Burned _____ Forestry Y/N _____ Control Burn Y/N _____ How did Fire Start? _____
 (Owner statement) _____

VEHICLE FIRE

Type of Vehicle _____ Make FORD Model CRUISE Year 2002
 Tag # _____ State GA Vin # _____ Where did fire appear to start? _____
 Engine Compartment Passenger / Cab area Trunk / Storage area Running Gear Other _____

TOTAL LOSS TO FRONT OF TRUCK-CAR STRUCTURE FIRE

Use of Structure? House Mobile home Shed / Garage School Commercial Industrial Office Apartment
 Construction? Wood Metal Brick / Block Heavy timber # of Stories _____ Size _____ X
 Smoke detector Y/N Working Y/N If No Why Not? _____ Sprinkler Y/N Working Y/N
 Where did fire start? _____ Fire floor # _____ grade basement
 How did fire appear to start? (Owner statement if any) _____

Was any equipment the cause of the fire? What? _____ Model? _____
 Make _____ Year _____ Serial # _____ How much burned? _____

RESPONDING MEMBERS

<u>A. DUNN</u>	<u>PA. HUG</u>	<u>W.H. BARNARD P.C.</u>
<u>D. HUNTER</u>	<u>R. WILSON</u>	
<u>K. TINSLEY</u>	<u>T. FOWLER</u>	
<u>W. TINSLEY</u>	<u>T. DENNIS</u>	
<u>H. HANSEN</u>	<u>S. GRANN</u>	
<u>G. LUCKY</u>		

Assisted By? _____ Gallons of Water? 100 Where from? CITY
 Insurance company? _____ Agent Name? _____
 Officer in Charge? H. HUNTER Member making report? H. HUNTER



P.O. BOX 1279
SNELLVILLE, GEORGIA 30078
770-978-1251

October 29, 2003

Carol Maberry
USAA
P.O. Box 31643
Tampa, FL 33631-3643

RE: [REDACTED]
2002 Ford Expedition
V.I.N. 1FMFU18L42 [REDACTED]
Date of Loss: 9-13-03
Member No. 2458154
C.I.S. File No. 0333230

Dear Ms. Maberry:

In accordance with your September 24, 2003 request Cunningham Investigative Services Fire Analysis Specialist Kevin Cunningham visited the Loganville, Georgia area on September 26, 2003 to investigate the above captioned fire loss. The purpose of the investigation was to determine the origin and cause of the fire.

A visual and photographic inspection of the fire-damaged vehicle was conducted at IAA.

The information received revealed that the vehicle was parked at a marina for approximately 45 minutes before catching on fire in the center of the rear of the engine compartment. The photographs of the fire in progress were closely examined.

Close examination revealed that the vehicle was in good condition at the time of the fire. No evidence of any collision damage was found on the vehicle. The residue from a dry powder extinguisher agent was found in the engine compartment at the time of this inspection. The burn patterns revealed that the fire originated in the rear center of the engine compartment and extended into the center of the dash. Electrically generated heat from an undetermined malfunction is the only cause that cannot be ruled out for this fire. The fire did not consume the interior of the passenger compartment. No abnormalities were found at the electric fuse center on the left (driver's side) of the dash. The vehicle was not disturbed in anticipation of a future examination when all interested parties have been notified and can be present to determine the exact malfunction that may have caused the fire.

The photographs taken at the time of this inspection are enclosed with this report.

2003-005-LC1-1101

2003-005-LC1-1101

Based upon the observations and investigation to date, it is the opinion of Cunningham Investigative Services that the fire originated in the rear center of the engine compartment. It is also the opinion of Cunningham Investigative Services that electrically generated heat from an undetermined malfunction is the only cause that cannot be ruled out for this fire. It is further the opinion of Cunningham Investigative Services that further investigation when all interested parties have been notified and can be present will be necessary to determine the exact malfunction that may have caused the fire.

CUNNINGHAM INVESTIGATIVE SERVICES



Kevin Cunningham, LAAI-CFI
Fire Analysis Specialist

KTC/sbc



EROS-506-LC1-1163



ER05-005-LC1-1164



EOSS-035-LC1-1185



EROS-005-LC1-1100

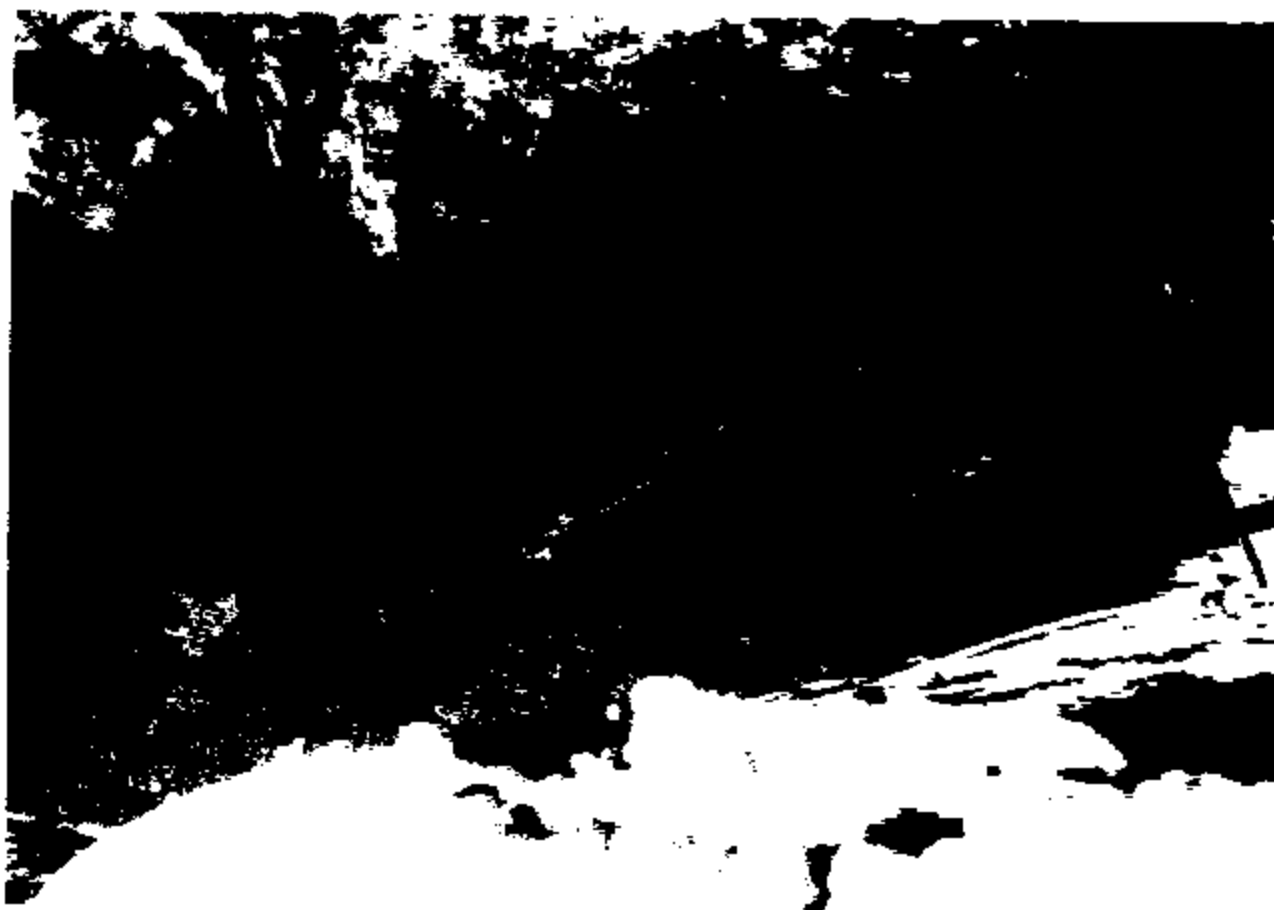


EA05-001-LC1-1187











COUNTRY

Insurance & Financial Services

3440 38th Avenue
Moline, IL 61265

tel (309) 757-1650

(800) 303-1721

fax (309) 757-0063

www.countryfinancial.com

February 18, 2004

Ford Motor Company
Box 8248
MD-3NE-B
Dearborn MI 48128-2588

RE: Date of Loss: February 2, 2004
Claim Number [REDACTED]
Insured Name: [REDACTED]

Dear Ford Motor:

This is to put you on notice of possible Subrogation against Ford in regards to a 1995 Ford F150 engine compartment fire. This vehicle owned by our Insured was parked in the attached garage when the fire started. The vehicle engine compartment has been determined as the origin of the fire. The resulting damage was a total loss of the insured dwelling and personal property along with the F150.

Our insured name: [REDACTED]

Alpha II

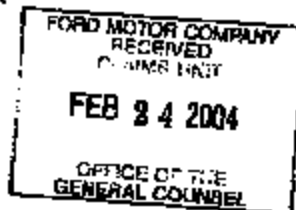
Vehicle: 1995 Ford F150
4x4 2 door long F14
vin: 1FTEF14N0S [REDACTED]
Engine 8-5.0L-FI
Miles 80,000

Please contact me if you have questions please reach me at 309-757-1655.

Sincerely,

COUNTRY Mutual Insurance Company®

John Rowley
John Rowley
Property Specialist
309-757-1655

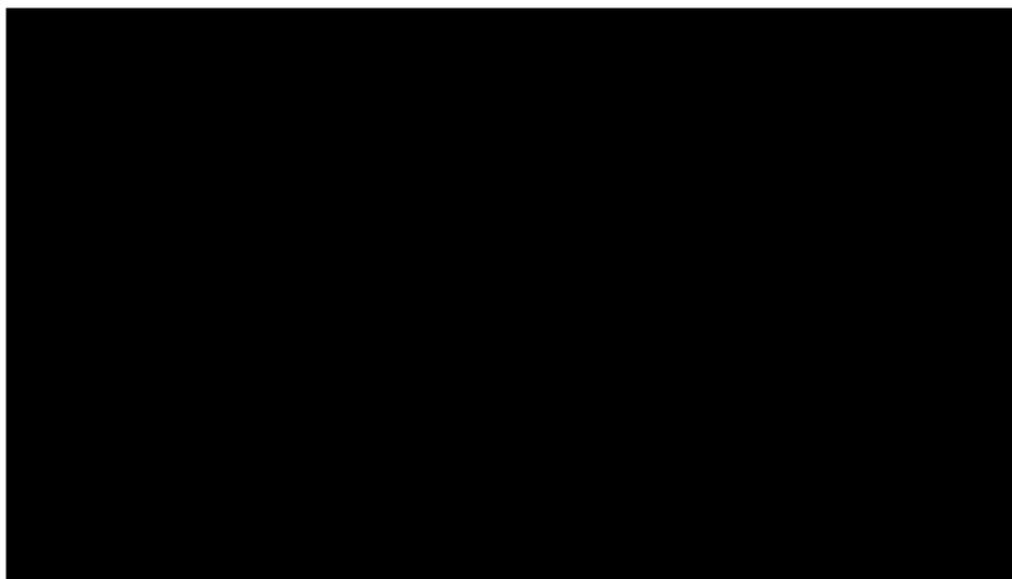


FEB 20 AM 43

CONSUMER AFFAIRS SECTION

*1995 F-150
- 60,000 (M)
- VIN
- Feb 2, 04*

ENR-000-LC1-1173



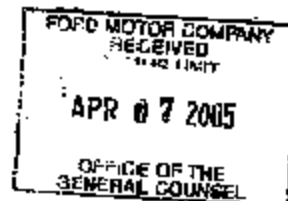


APR 06 2005

Date: March 29, 2005

FORD MOTOR COMPANY
CONSUMER AFFAIRS DEPT
P.O. BOX 6248
MD-3NE-B
DEARBORN, MI 48126

Re: Named Insured: [REDACTED]
Vehicle Info: 1997 FORD F-150
VIN: 1FTDX1764V [REDACTED]
Claim #: [REDACTED]
Policy #: [REDACTED]
Date of Loss: 03/10/2005
Date Reported: 03/10/2005



To Whom It May Concern:

In the investigation of the above reference claim, it appears the fire was caused by an electrical short in the engine compartment of the truck. The insured advised that the cruise control was not operational on the vehicle at the time of loss and there had not been any electrical components replaced on the vehicle. The vehicle had been parked for several hours at the Insured's place of employment at the time of the fire. The fire also damaged two vehicles parked beside the Insured's vehicle.

Due to the nature of this fire and it's similarities to your recent recall of newer model vehicles, Assurance America Insurance request that you complete an inspection of this loss.

We will hold the vehicle at the following salvage yard for your inspection for 30 days:

Copart
399 Oak Ridge Road
Tifton, GA 31794
Phone: (229) 386-4900
Fax: (229) 386-5013
Lot #: 03581095

I will need to know when you would be sending someone to inspect this vehicle so I can call Copart and give authorization for your inspection.

Sincerely

[Signature]
Kevin Edwards
Claims Specialist
Assurance America Insurance
888-952-2902 Ext #223 (Toll Free)
888-579-8801 (Toll Free Fax)
kedwards@aaiclaims.com

Cc: Karen Gleason

PO Box 723128 Atlanta, GA 31139
678-996-0110 fax 770-984-0170
claims@aaiclaims.com

PROD-805-101-1174

INCIDENT REPORT ALBANY FIRE DEPARTMENT

NFIRS-1

FORM 04701		INCIDENT NO. 044	EXP NO. 00	MO 03	DAY 10	YR 05	DAY OF WEEK Thursday	ALARM TIME 1655	ARRIVAL TIME 1659	IN SERVICE 1740	
TYPE OF SITUATION FOUND Vehicle Fire							TYPE OF ACTION TAKEN Extinguished		MUTUAL AID () Read () Clean		
FIXED PROPERTY USE Parking lot							IGNITION FACTOR Undetermined				
CORRECT [REDACTED]							CC 079	TWN 073	ZIP CODE [REDACTED]	CENSUS TRACT [REDACTED]	
OCCURANCE NAME [REDACTED]							TELEPHONE [REDACTED]		ROOM/APT NO. [REDACTED]		
OWNER NAME SAME							ADDRESS 1507 Argonne		TELEPHONE SAME		
METHOD OF ALARM FROM PUBLIC 911			TYPE OF ALARM S-111		DISTRICT 03	SHIFT B	STATION 03	NO. ALARMS 1			
BTL USED YES		PERSONNEL RESPONDED 4		ENGINES RESPONDED 1		AERIAL APPARATUS 0		OTHER VEHICLES 1			

NUMBER OF INJURIES FIRE SERVICE 0	OTHER 0	NUMBER OF FATALITIES FIRE SERVICE 0	OTHER 0
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COMPLEX Parking Area		MOBILE PROPERTY TYPE Automobile	
AREA OF FIRE ORIGIN Engine Compartment		EQUIPMENT INVOLVED IN IGNITION Engine	
FORM OF HEAT OF IGNITION Undetermined	TYPE OF MATERIAL IGNITED Undetermined	FORM OF MATERIAL IGNITED Undetermined	
METHOD OF EXTINGUISHMENT 1 1/4 250 gal water	LEVEL OF FIRE ORIGIN 3 ft. Above grade	ESTIMATED LOSS \$8,000	ESTIMATED VALUE 10,000

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

IF MOBILE PROPERTY	YEAR 97	MAKE V48	MODEL F-150	SERIAL NO. [REDACTED]	LICENSE NO. [REDACTED]
IF EQUIPMENT INVOLVED IN IGNITION	YEAR 96	MAKE FORD	MODEL F-150	SERIAL NO. 1E10X1710VA	[REDACTED]

☒ CHECK IF COMMENTS

OFFICER IN CHARGE (NAME, POSITION, ASSIGNMENT) Lt. R. Eaden Sta 3 B-Shift	DATE 3-10-05
MEMBER MAKING REPORT (IF DIFFERENT FROM ABOVE)	DATE

INCIDENT REPORT

ALBANY FIRE DEPARTMENT

A

FOID	INCIDENT NO	EXP NO	MO	DAY	YR	DAY OF WEEK	ALARM TIME
04/01	1004	000	03	10	05	Thursday	1653

NARRATIVE

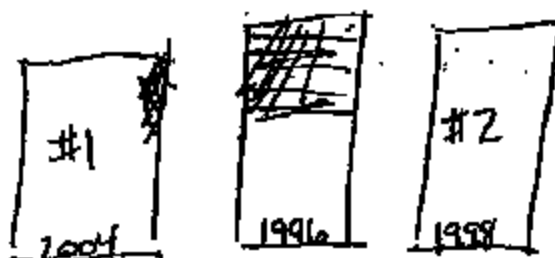
On Arrival found 96 F150 pickup engine Area fully involved with fire. The hood was melted away front windshield melted, front left tire on fire. Used 1 3/4 250 gal water to extinguish & cool interior as well as 2 other vehicles parked next to this vehicle.

Exposure #1 2004 Ford Expedition XLT

Owner [REDACTED]

Exposure #2 1998 Ford Explorer XLT

Owner [REDACTED]



INCIDENT REPORT
ALBANY FIRE DEPARTMENT

NFIRS-1

										<input type="checkbox"/> DELETE <input type="checkbox"/> CHANGE		
A	FOID 04701	INCIDENT NO 0404	EXP NO 01	MO 03	DAY 10	YR 05	DAY OF WEEK Thursday	ALARM TIME 1655	ARRIVAL TIME 1659	IN SERVICE 1740		
B	TYPE OF SITUATION FOUND Exposure to Fire						TYPE OF ACTION TAKEN Coded Exterior		MUTUAL AID <input type="checkbox"/> (Recd) <input type="checkbox"/> (Given)			
C	FIXED PROPERTY USE Parking Lot						IGNITION FACTOR Radiant Heat					
D	CORRECT ADDRESS [REDACTED]						CO. 023	TWN 002	ZIP CODE [REDACTED]	CENSUS TRACT [REDACTED]		
E	OCCUPANCY [REDACTED]						TO CHANGE [REDACTED]		ROOM/APT NO [REDACTED]			
F	OWNER NAME Same						ADDRESS [REDACTED]		TELEPHONE None			
G	METHOD OF ALARM FROM PUBLIC 911						TYPE OF ALARM Bell		DISTRICT 03	SHIFT A	STATION 03	
H	B11 USED Yes		PERSONNEL RESPONDED 4		ENGINES RESPONDED 1		AERIAL APPARATUS 0		OTHER VEHICLES 1			

I	NUMBER OF INJURIES FIRE SERVICE 0		OTHER 0	NUMBER OF FATALITIES FIRE SERVICE 0		OTHER 0
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J	COMPLEX Parking Area		MOBILE PROPERTY TYPE Automobile	
K	AREA OF FIRE ORIGIN Right Garden Area		EQUIPMENT INVOLVED IN IGNITION Vehicle fire	
L	FORM OF HEAT OF IGNITION Vehicle fire (Exposure)		TYPE OF MATERIAL IGNITED Paint, Light Covers	FORM OF MATERIAL IGNITED Paint from Light Covers
M	METHOD OF EXTINGUISHMENT Dry Ice Extinguisher		LEVEL OF FIRE ORIGIN 3rd Floor	ESTIMATED LOSS \$2000
				ESTIMATED VALUE \$20,000

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

S	IF MOBILE PROPERTY Automobile	YEAR 04	MAKE Ford	MODEL Exposition ELT	SERIAL NO. VIN 1-4	LOCATION NO. [REDACTED]
T	IF EQUIPMENT INVOLVED IN IGNITION	YEAR	MAKE	MODEL	SERIAL NO. 1500456789	[REDACTED]

(X) CHECK IF COMMENTS

U	OFFICER IN CHARGE (NAME, POSITION, ASSIGNMENT) Lt DE Golden 3rd Shift	DATE 3-10-05
	MEMBER MAKING REPORT (IF DIFFERENT FROM ABOVE)	DATE

INCIDENT REPORT

ALBANY FIRE DEPARTMENT

NFIRS-1

☐ DELETE
☐ CHANGE

A	FOID 04701	INCIDENT NO 1664	EXP NO 02	MO 03	DAY 10	YR 05	DAY OF WEEK Thursday	ALARM TIME 11:55	ARRIVAL TIME 11:59	IN SERVICE 1740
B	TYPE OF SITUATION FOUND Exposure to fire						TYPE OF ACTION TAKEN Investigation		MUTUAL AID <input type="checkbox"/> Recd <input type="checkbox"/> Given	
C	FIXED PROPERTY USE Parking Lot						IGNITION FACTOR Exposure to fire vehicle			
D	CORRECT ADDRESS [REDACTED]						CO. 023	TWN 31	ZIP CODE 205	CENSUS TRACT [REDACTED]
E	OCCUPANT [REDACTED]						TELEPHONE [REDACTED]		ROOM/APT NO [REDACTED]	
F	OWNER NAME Same						ADDRESS [REDACTED]		TELEPHONE Same	
G	METHOD OF ALARM FROM PUBLIC 911			TYPE OF ALARM FD11			DISTRICT 03	SHIFT B	STATION 03	NO. ALARMS 1
H	911 USED Yes		PERSONNEL RESPONDED 4		ENGINES RESPONDED 1		AERIAL APPARATUS 0		OTHER VEHICLES 1	

I	NUMBER OF INJURIES FIRE SERVICE 0		OTHER 0		NUMBER OF FATALITIES FIRE SERVICE 0		OTHER 0	
---	--------------------------------------	--	---------	--	--	--	---------	--

J	COMPLEX Parking Area		MOBILE PROPERTY TYPE Automobile	
K	AREA OF FIRE ORIGIN Left front Area		EQUIPMENT INVOLVED IN IGNITION Vehicle Fire	
L	FORM OF HEAT OF IGNITION Exposure - Radiant heat		TYPE OF MATERIAL IGNITED unidentified	
M	METHOD OF EXTINGUISHMENT 1 1/2 tank water		LEVEL OF FIRE ORIGIN 3 ft Above	
			ESTIMATED LOSS 2,000	
			ESTIMATED VALUE 15,000	

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

S	IF MOBILE PROPERTY Automobile		YEAR 98	MAKE Ford	MODEL Explorer Nt	SERIAL NO. 41W44	786 LICENSE NO.
T	IF EQUIPMENT INVOLVED IN IGNITION		YEAR	MAKE	MODEL	SERIAL NO. 1F02U32E7W	

[X] CHECK IF COMMENTS

OFFICER IN CHARGE (NAME, POSITION, ASSIGNMENT)	DATE
Lt P. Golden Sr. 3 Bn. Lt	3-10-05
MEMBER MAKING REPORT (IF DIFFERENT FROM ABOVE)	DATE

Michael
Lewis
8132Vinson Guard Service
INCIDENT REPORT

NATURE OF INCIDENT:		REPORT NO. <u>MG-23-10-05[1]</u>
<input type="checkbox"/> Theft of Property	<input checked="" type="checkbox"/> Other <u>FIRE</u>	<u>3-10-05</u> <u>1823</u> Date and Time of Report
<input type="checkbox"/> Found Property		<u>3-10-05</u> <u>1657</u> Date and Time of Incident
<input type="checkbox"/> Vandalism		<u>F&G</u> Work Site
<input type="checkbox"/> Trespassing		<u>MAIN GATE PARKING LOT</u> Location of Incident
<input type="checkbox"/> Policy/Rule Violation		
<input type="checkbox"/> Unauthorized Entry/Exit		
<input type="checkbox"/> Substance Abuse		
<input type="checkbox"/> Vehicle Accident		
REPORT IN DETAIL: Who — What — When — Where — How — Why		
Complainant	ID or Soc. Sec. No.	Dept. or Address
		<u>K-22 Miami</u>
Offender	ID or Soc. Sec. No.	Dept. or Address
Witness	ID or Soc. Sec. No.	Dept. or Address
<u>Vinson Security</u>		<u>MAIN GATE</u>

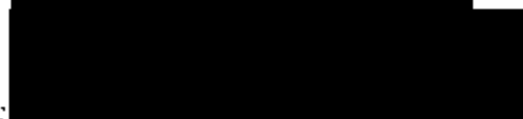
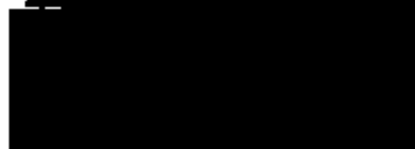
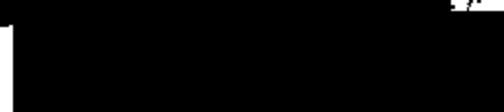
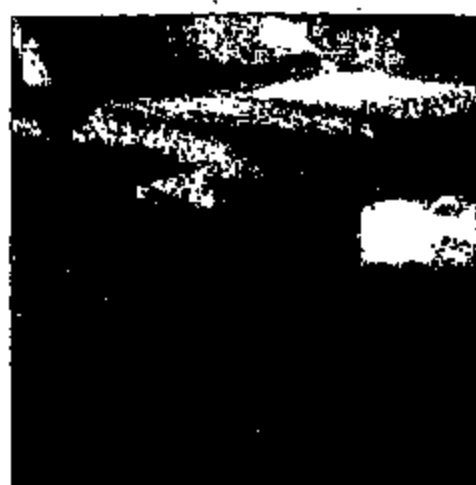
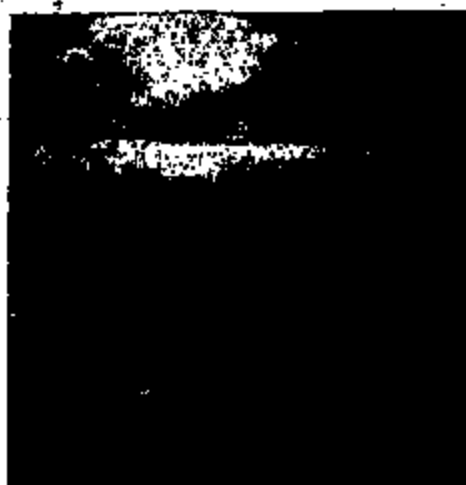
DESCRIPTION OF INCIDENT AT APPROX 1657 KIDICAL FELT THAT A CAR IN THE PARKING LOT
THE MAIN GATE GUARD STATED THAT A CAR IN THE PARKING LOT
WAS ON FIRE. OFFICER CAMPBELL CALLED 911 FOR A FIRE TRUCK, 1 OFFICER
DISPATCHED. TURNED THE CAMERA TO MAIN GATE. WE CONTACTED Sgt. Dixon
AND THE FIRE TRUCK. AT 1658 THE FIRE ALARM TO BLD 79 WAS
PULLED. OCPD WAS CALLED AT 1703 SO WE COULD IDENTIFY WHOSE
CAR WAS BELONGING TO. TRUCK #1 IS OWNED BY [REDACTED]
K-6 FLAME, WAS DAMAGED AT 1630 AND APPEARED NOTHING WAS WRONG
TRUCK #1 CAUGHT ON FIRE, BEING FULLY IMMERSED. REASON UNKNOWN
FOR THE FIRE - TOTAL DAMAGE. TRUCK #2 [REDACTED]

Estimate of Theft or Damage \$ <u>TOTAL</u>	REPORTED BY:
Continued on Reverse Side <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<u>[Signature]</u> Security Officer
Reviewed by: <u>[Signature]</u> Date: <u>03/10/05</u>	

Wilson Guard Service
INCIDENT REPORT

REPORT NO. M6-03-10-0511

FROM 2A WILSON ROAD DAMAGE TO TRUCK RIGHT SIDE AND SIDE TREE
 PLASTIC ON THE TREE EST. DAMAGE \$3000. TRUCK#3 OWNED BY [REDACTED]
 [REDACTED] AND SPACE DAMAGE, SHE WORKS IN CURE WORKING TIME FOR
 COMPANY FULLY PUT OUT THE FIRE AT 1710 AND LEFT AT 1745. TRUCK
 CARRIED THE AREA. TRUCK#1 WILL BE TOWED AWAY LATER THIS
 TRUCK#2 WILL CLEAN AREA. TIM HARTMAN AND CEE BLUNT
 MONITOR





ERMS-005-L01-11A2

3/29/2005



3/29/2005

ENCLOSURE LC1-1183



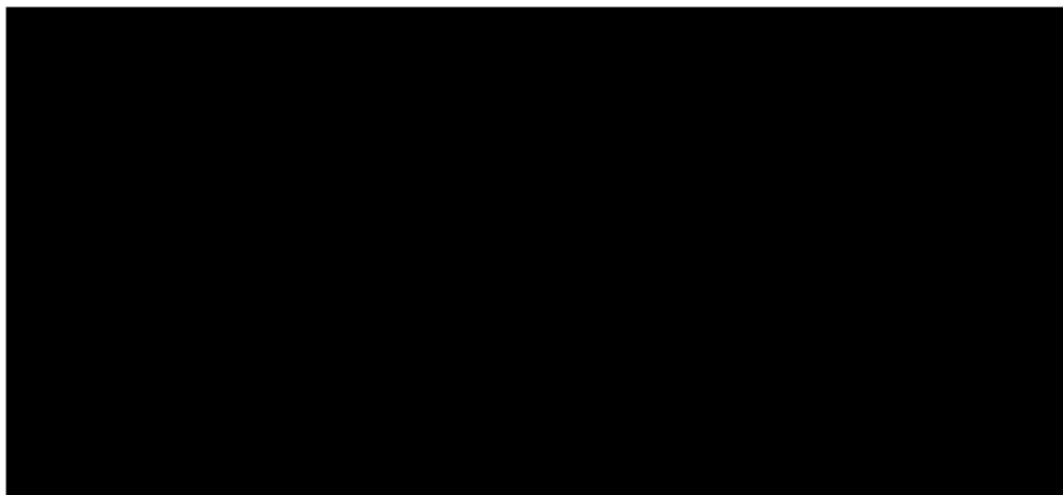
3/29/2005

EROS-885-LC1-1184



3/29/2005

EROS-085-LC1-1185



Monday, February 14, 2005

FORD MOTOR COMPANY
PARKLAND TOWERS WEST, #300
DEARBORN, MI 48126-2568

FEB 23 2005

Re: PRODUCT DEFECT CAUSED VEHICLE FIRE AND RESULTING DAMAGES.

VIN: 1FTRW08L41K [REDACTED]

Year: 2001

Make: FORD

Model: F-150

Our Insured: [REDACTED]

Address: [REDACTED] NY [REDACTED]

Phone No.: [REDACTED]

Our Claim No.: [REDACTED]

Date of Loss: 1-23-05

Damages: \$ 24,001.20

FEB 23 2005

NOTICE OF SUBROGATION CLAIM

Please accept this letter as formal notice of our subrogation rights in regard to the above-captioned claim. Demand is hereby made upon you for payment of Progressive's damages and those of Progressive's insured.

Our investigation indicates damages to our insured's vehicle was a direct result of a manufacturer's defect or negligence on your behalf. Enclosed please find all supporting documentation.

Please acknowledge receipt of my subrogation demand and forward your payment of \$24,001.20 to my attention, payable to "Progressive Northeastern Insurance Company, as subrogee of [REDACTED]", and mail to my attention at [REDACTED] Richmond Hts., OH [REDACTED]

You can contact me at the number listed below should you need additional documentation or care to discuss this claim.

Thank you for your anticipated cooperation.

Progressive Northeastern Insurance Company

William P. Kiesel
Subrogation Representative
(440) 603-7967

ENCLOSURE LC1-1108

All Action Details for Issue

Print

VIN: 1FTRD10K141K	Year: 2001	Model: F-SERIES	Case: 006750275
Name: [REDACTED]	Owner Status: Subsequent	WFO: 2001-04-20	
Symptom Desc: FIRE/SMOKE SCORCHED/BURNT UNDERHOOD		Primary Phone: [REDACTED]	
Reason Desc: LEGAL - ACCIDENT / FIRE		Secondary Phone: [REDACTED]	
Issue Type: 07 LEGAL	Issue Status: CLOSED		

Action: ADVISE CUST INFORMATION WILL BE SENT TO CONSUMER AFFAIRS - FIRE
 Dealer: 03676 RIVERHEAD MOTORS, INC. Origin Desc: US CONCERN CASE BASE
 Odometer: 105000 MI Comm Type: PHONE
 Analyst Name: MONGE FATIMA Analyst: FMONGE2
 Action Date: 01/27/2005 Action Time: 18:57:55.938 Action Date: No

Comments: CUSTOMER SAID: VEH BURNT TO THE GROUND ON SAT JAN 22 2005 PARKED AT THE APARTMENT PARKING LOT - FOLLOWING MORNING ENGINE WAS BURNT AND THE DASHBOARD AREA WAS BURNT - HAPPENED 0.30-10.30 PM - FIRE STARTED UNDER THE ENGINE COMPARTMENT - PICKED UP BY INSURANCE COMPANY AND IS CURRENTLY WITH THEM - FIRE REPORT WAS FILED - NO FINDINGS PROVIDED BY FIRE DEPARTMENT - CLAIM WAS FILED WITH INSURANCE - CLAIM PENDING YES PENDING - VEHIS NOT REPAIRABLE - FIRE OCCURED AT 75 SUNRISE CRT APT 18 MORICHES NY 11955 - CNN FORD ANNOUNCING A RECALL FOR CRUISE CONTROL - WANTS TO VERIFY THE RECALL - DEALER SAID: RIVERHEAD MOTORS, INC. 1655 OLD COUNTRY ROAD RIVERHEAD, NY 11901 TEL: (631) 727-2200 CNC ADVISED: - I WILL FORWARD THIS INFORMATION TO OUR CONSUMER AFFAIRS GROUP. SOMEBODY FROM CONSUMER AFFAIRS WILL CONTACT YOU IN 2 BUSINESS DAYS. PLEASE NOTIFY YOUR INSURANCE CARRIER AND REPORT THIS INCIDENT.

Action: SEND ACKNOWLEDGEMENT LETTER TO CUSTOMER
 Dealer: 03676 RIVERHEAD MOTORS, INC. Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION
 Odometer: 105000 MI Comm Type: PHONE
 Analyst Name: KIRKSEY, VINCE (V.) Analyst: VIKRKSE1
 Action Date: 01/28/2005 Action Time: 16:27:11.862 Action Date: No

Comments: ***LPA COMMENTS*** LPA ACKNOWLEDGES RECEIPT OF THE CUSTOMER'S CONTACT MADE TO THE CRC. THE CUSTOMER IS ALLEGING A DEFECT CAUSED HIS VEHICLE FIRE. NO INJURIES WERE SUSTAINED, AND INSURANCE COMPANY WAS CONTACTED. [THE CUSTOMER IS SEEKING FMC TO INVESTIGATE THE MATTER.]

Action: REFER TO INSURANCE CARRIER- BEYOND WARRANTY
 Dealer: 03676 RIVERHEAD MOTORS, INC. Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION
 Odometer: 105000 MI Comm Type: MAIL
 Analyst Name: KIRKSEY, VINCE (V.) Analyst: VIKRKSE1
 Action Date: 02/02/2005 Action Time: 15:08:53.381 Action Date: No

Comments: ***LPA COMMENTS*** LPA HAS REVIEWED THE ABOVE CASE, AND FOUND THE CUSTOMER'S VEHICLE IS BEYOND THE REGULAR WARRANTY WITH NO ADDITIONAL COVERAGE AVAILABLE, AND NO RECALLS/PROGRAMS PERTAINING TO THE CUSTOMER'S CONCERN. BASED ON THIS INFORMATION, WE WILL BE UNABLE TO PROVIDE ASSISTANCE IN THE MATTER, AND PROPOSE NO FURTHER ACTION.

E005-005-1C1-1187

3/7/2005

All Action Details for (same)

Print

VIN: 1GTR140141	Year: 2001	Model: F-SERIES	Case: 588780275
Name: [REDACTED]	Owner Status: Subsequent	WSD: 2001-04-20	
Symptom Desc: GENERAL INQUIRIES REQUEST/ NON-VEHICLE RELATED		Primary Phone: [REDACTED]	
Reason Desc: CAC RELATED - FM CSR FOLLOWING CONTACT		Secondary Phone: [REDACTED]	
Issue Type: 02 INFORMATION	Issue Status: CLOSED		

Action: CALLBACK ADD ADDITIONAL COMMENTS

Dealer: 03076 RIVERHEAD MOTORS, INC.

Origin Desc: US CONCERN CASE BASE

Odometer: 1 MI

Comn Type: PHONE

Analyst Name: RICHARDSON PAUL

Analyst: PRCHA54

Action Date: 01/28/2005

Action Time: 15:28:41.280

Action Date: No

Comments: CUSTOMER SAID: CUST IS CALLING ABOUT THE VEH FIRE AND THEY WOULD LIKE THE NUMBER TO THE LEGAL DEPT/CRIC ADVISED: PLEASE ALLOW THE REQUESTED TIME FOR THE FOLLOW UP TO OCCUR SO THAT YOUR ISSUE MAY BE PROPERLY ADDRESSED.

E928-005-101-1100

3/7/2005

All Action Details for Issue

Print

VIN: 1FTRW08L41 Year: 2001 Model: F-SERIES Case: 598780275
 Name: [REDACTED] Owner Status: Subsequent WSD: 2001-04-20
 Symptom Desc: FIRE/SMOKE/SCORCHED/BURNT UNDERHOOD Primary Phone: [REDACTED]
 Reason Desc: RECALL/CP - VEHICLE INVOLVEMENT Secondary Phone: [REDACTED]
 Issue Type: 03 CONCERN Issue Status: CLOSED
 Initial Customer Contact: 01/28/2005

Action: ADVISE CUST OF FSACSP; DOCUMENT CAMPAIGN NUMBER
 Dealer: 03678 RIVERHEAD MOTORS, INC. Origin Desc: US INQUIRY CASE BASE
 Odometer: 105000 MI Comm Type: PHONE
 Analyst Name: MONGE FATIMA Analyst: FMONGE2
 Action Date: 01/27/2005 Action Time: 15:42:15.438 Action Date: Yes

Comments: CUSTOMER SAID: -VEH BURNT TO THE GROUND ON SAT JAN 22 2005-PARKED AT THE APARTMENT PARKING LOT -FOLLOWING MORNING ENGINE WAS BURNT AND THE DASHBOARD AREA WAS BURNT-HAPPENED 9:30-10:30 PM - FIRE STARTED UNDER THE ENGINE COMPARTMENT - PICKED UP BY INSURANCE COMPANY AND IS CURRENTLY WITH THEM -FIRE REPORT WAS FILED -NO FINDINGS PROVIDED BY FIRE DEPARTMENT -CLAIM WAS FILED WITH INSURANCE - CLAIM PENDING YES PENDING -VEHS NOT REPAIRABLE -FIRE OCCURED AT 79 SUNRISE CRT APT 18 MORICHES NY 11855-CNN -FORD ANNOUNCING A RECALL FOR CRUISE CONTROL PROBLEM -WANTS TO VERIFY THE RECALL-DEALER SAID: RIVERHEAD MOTORS, INC. 1885 OLD COUNTRY ROAD-RIVERHEAD, NY 11901 TEL: (631) 727-2200-FCO ADVISED: PLEASE ADVISE THE CUSTOMER OF THE INFORMATION FOUND IN THE CUSTOMER LETTER OR THE SEARCH ENGINE Q&A. PLEASE DOCUMENT ANY INFORMATION YOU PROVIDE TO THE CUSTOMER-ADVISED CUST AS PER CASE ON SAFETY RECALL 01521-IN SOME OF THE AFFECTED VEHICLES, IT IS POSSIBLE THAT THE DRIVER'S AND/OR FRONT PASSENGER'S OUTBOARD SEAT BELT BUCKLE MAY NOT FULLY LATCH. IN THE EVENT OF AN ACCIDENT, THE RESTRAINT SYSTEM MAY NOT PROVIDE THE DESIGNED LEVEL OF OCCUPANT PROTECTION-BEFORE DEMONSTRATING OR DELIVERING ANY OF THE VEHICLES INVOLVED IN THIS RECALL, THE DEALER MUST INSPECT THE FRONT DRIVER'S SEAT AND OUTBOARD FRONT PASSENGER'S SEAT BELT BUCKLE FOR PROPER LATCH PERFORMANCE. -ADVISED CUST THAT THIS IS THE ONLY SAFETY RECALL OPEN ON THE VEH AT THIS TIME

Data Element Name	Data Value
FSACSP CAMPAIGN NUMBER	01521

Action: NO REPAIR PROCEDURE AVAILABLE AT THIS TIME PER - "OTHER"
 Dealer: 03678 RIVERHEAD MOTORS, INC. Origin Desc: DEALER
 Odometer: 105000 MI Comm Type: PHONE
 Analyst Name: RIVERHEAD MOTORS Analyst: T-TUMUL1
 Action Date: 01/28/2005 Action Time: 15:07:53.528 Action Date: No

Comments: VEHICLE WENT ON FIRE INSURANCE COMPANY IS LOOKING AT VEHICLE CUSTOMER HEARD RECALL ON NEWS FOR SPEED CONTROL CUSTOMER WANTS TO BLAME SPEED CONTROL ?????

2005-085-1-01-1100

All Action Details for Issue

Print

VIN: 1FTRM1BLAN	Year: 2001	Model: F-SERIES	Case: 53950172
Name:	Owner Status: Original	WSD: 2001-04-20	
Symptom Desc: COOLING SYSTEM NOISE RADIATOR AREA		Primary Phone:	
Reason Desc: RECALL/ONP - SCHEDULING AND APPOINTMENT		Secondary Phone:	
Issue Type: Q2 INFORMATION	Issue Status: CLOSED		

Action: RECALL - PART ORDERED
Dealer: 03840 8Y06SET FORD
Odometer: 1000 MI
Analyst Name: FROST, RACHELLE
Action Date: 01/17/2002

Comm Type: PHONE
Analyst: R-FROST2
Action Time: 14:57:03.096

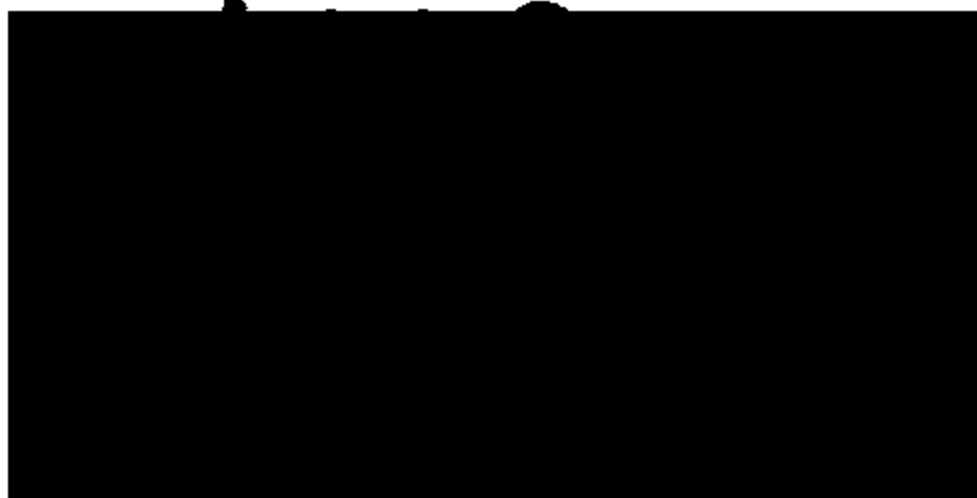
Origin Desc: RENKIM

Action Date: No

Continents PROGRAM 01883. PLEASE FORWARD THIS TO YOUR PARTS AND SERVICE DEPTS. HAS CONTACTED FORD PROGRAM ASSISTANCE CENTER TO OBTAIN CSP PART. THE CUSTOMER HAS CHOSEN YOUR DEALERSHIP FOR A SERVICE APPOINTMENT. PLEASE CONTACT THE OWNER WITHIN 3 DAYS TO SETUP A SERVICE DATE. YOU WILL RECEIVE THE PART WITH YOUR DAILY PARTS SHIPMENT. THE FIRST 9 AND LAST 8 OF THE VIN WILL APPEAR ON THE PACKING SLIP. CUSTOMER PHONE NUMBER IS 616-238-8551. FOR ANY QUESTIONS OR CUSTOMER INFORMATION, PLEASE CALL 1-800-248-0185. REFERENCE D.O.R.# 50258.

FRI05-005-LS1-1199

3/7/2005



All Action Details for Issue

Print

VIN: 1ETEEL2WVK	Year: 1997	Model: F-SERIES	Case: 351840535
Name: [REDACTED]	Owner Status: Subsequent	WSD: 1996-10-21	
Symptom Desc: FIRE/SMOKE SMOKE		Primary Phone: [REDACTED]	
Reason Desc: LEGAL - CUSTOMER WAITING FOR OGC LETTER		Secondary Phone: [REDACTED]	
Issue Type: 02 INFORMATION	Issue Status: CLOSED		

Action: CB-IT TAKES ABOUT 5 BUSINESS DAYS TO RECEIVE THE LETTER		
Dealer: D4967 DUNCAN FORD-LINCOLN-MERCURY	Origin Desc: US CONCERN CASE BASE	
Odometer: 80000 MI	Comms Type: PHONE	
Analyst Name: NIKOLOVSKI STEVAN	Analyst: SNIKOL04	
Action Date: 03/04/2005	Action Time: 12.45.21.757	Action Data: No

Comments CUSTOMER SAID: -THE VEHICLE HAD A FIRE. -WAS TOLD SOMEONE WILL CALL ME BACK ON FRIDAY. -NO ONE HAS CALLED ME BACK YET. DEALER SAID: -NONECHG ADVISED: THANK YOU FOR CONTACTING FORD MOTOR COMPANY IN RELATION TO THIS ISSUE. IT TAKES APPROXIMATELY 10 BUSINESS DAYS TO RECEIVE THE LETTER TO TAKE IN ACCOUNT FOR ANY POSTAL OFFICE DELAYS. IF YOU DO NOT RECEIVE YOUR LETTER IN 10 DAYS, PLEASE CALL US BACK AND WE WILL REQUEST FOR A SECOND LETTER TO BE MAILED.

EPC-005-LC1-1181

3/8/2005

All Action Details for Issue

Print

VIN: 1FTEP17W4V	Year: 1997	Model: F-SERIES	Case: SB1640535
Name:	Owner Status: Subsequent	WSD: 1999-10-21	
Symptom Desc:		Primary Phone:	
Reason Desc: MISC INQUIRY - GENERAL/OTHER		Secondary Phone:	
Issue Type: 02 INFORMATION	Issue Status: CLOSED		

Action: AS PER TEAM LEADER

Dealer:

Odometer: 00000 MI

Analyst Name: BLAKE NOVELETTE

Action Date: 03/02/2005

Comms Type: PHONE

Analyst: NBLAKE

Action Time: 14:48:48.853

Origin Desc: MANUAL - PHONE CSR

Action Date: Yes

Comments CUSTOMER SAID: STATES THAT HE HAD CALLED CRC ABOUT HIS FIRE- ****SEE HISTORICAL ****-. WAS TOLD HE WILL RECEIVED A CALLED WITHIN 5 BUSINESS DAYS - HAVEN'T RECEIVED A CALL BACK - HAD CALL BACK AND WAS STILL TOLD SOMEONE WILL CALL HIM BACK- SEEKING ASSISTANCE DEALER SAID: NONE CRC ADVISED: AS PER HELEN STATES TO ADVISE CUST THAT TO WAITE UNTIL FRIDAY AND IF HE HAD NOT RECEIVED A CALL THEN HE SHOULD CALLED CRC BACK - ****INSIDE INFO**** IF CUST CALL BACK, CSR SHOULD ESCALATE TO TEAM LEADER

Data Element Name

Data Value

TEAM LEADER NAME

JBLAGROV

E005-005-LC1-1192

3/8/2005

All Action Details for Issue

Print

VIN: 1FTEP17W4V Year: 1997 Model: F-SERIES Case: 361640535
 Name: Owner Status: Subsequent WSD: 1998-10-21
 Symptom Desc: FIRE/SMOKE SMOKE Primary Phone:
 Reason Desc: RECALL/ONP - VEHICLE INVOLVEMENT Secondary Phone:
 Issue Type: 03 CONCERN Issue Status: CLOSED
 Initial Customer Contact: 02/22/2005

Action: ADVISE CUST OF FSACSP; DOCUMENT CAMPAIGN NUMBER
 Dealer: 04967 DUNCAN FORD-LINCOLN-MERCURY Origin Desc: US INQUIRY CASE BASE
 Odometer: 80000 MI Comm Type: PHONE
 Analyst Name: SANDRA BARTELL Analyst: SBARTELL
 Action Date: 02/22/2005 Action Time: 10.05.15.421 Action Date: Yes

Comments CUSTOMER SAID: _THE VEH CAUGHT ON FIRE FEB/17/2006 AT 3:30AM _THE VEH WAS SITTING SINCE 10:00PM NIGHT BEFORE _SMOKE CAME IN MY APPTMENT AND YOU COULD NOT EVEN BREATHE _THE FIRE DEPARTMENT PUT THE FIRE OUT THEY STATED IT MAY HAVE COME UNDER THE HOOD AND THEY ARE DOING FURTHER INVESTIGATION _IT MELTED THE WATERLINES AND PIPES AND UNDERNEATH THE PARKING LOT THERE WAS SMOKE DAMAGE IT CAUSED DAMAGE TO MY APARTMENT BUILDING'S _THE POLICE WERE THERE AND THEY TURNED IT OVER TO THE FIRE DEPARTMENT _DAMAGE THAT WAS CAUSED WERE FOUR APARTMENT BUILDING'S _INSURANCE COMPANY WAS CONTACTED AND WE ARE WAITING ON THEM _FIRE DEPARTMENT ADVISED THERE MAY BE A FSA AND TO LET FORD KNOW ABOUT THIS _I'M CALLING TO LET YOU KNOW WHAT ARE MY NEXT STEPS ?DEALER SAID: DUNCAN FORD - LINCOLN - MERCURY 1618 ROOSEVELT BLVD KEY WEST, FL 33040 DISTANCE: 1.24 MILE TEL: (305) 294-5126 FAX: (305) 294-4536 CRC ADVISED: PLEASE ADVISE THE CUSTOMER OF THE INFORMATION FOUND IN THE CUSTOMER LETTER OR THE SEARCH ENGINE Q&A. PLEASE DOCUMENT ANY INFORMATION YOU PROVIDE TO THE CUSTOMER.

Data Element Name

Data Value

FSACSP CAMPAIGN NUMBER

00622

Action: AWAITING ASSISTANCE - TECHNICAL HOTLINE
 Dealer: 04967 DUNCAN FORD-LINCOLN-MERCURY Origin Desc: DEALER
 Odometer: 80000 MI Comm Type: PHONE
 Analyst Name: STEPHEN PETRO Analyst: S-PETRO
 Action Date: 02/28/2005 Action Time: 13.31.05.730 Action Date: No

Comments CALLED CUSTOMER ON 2/22, HE BOUGHT TRUCK USED 2 TO 2.5 YEARS AGO FROM INDEPENDANT CAR LOT. TRUCK IS REGISTERED AS COMMERCIAL VEH. CUSTOMER & LOCAL FIRE DEPT STATES THE FIRE STARTED IN LEFT REAR CORNER OF ENGINE COMPARTMENT. CALLED LYNN LOWE AT FORD FLEET BECAUSE TRUCK IS A COMMERCIAL USE & WENT OVER ALL INFO. LYNN CALLED ME BACK ON 2/24 & SAID FORD LEGAL WOULD CALL ME WITHIN 24 HOURS. STILL NO CALL AS OF 1:00PM ON 2/28/05. CALLED CUSTOMER 2/28 TO ASK IF FORD HAD CALL HIM YET & HE SAID NO. CALLED RECALL SUPPORT & THEY SHOW SEATECH ELECTRIC AS OWNER(WHICH IS BRIAN'S COMPANY) BUT THE ADDRESS INFO IS WRONG. DIANA SAID SHE WOULD CORRECT IT FOR FUTURE INFO. PETER

Action: DOCUMENT INFORMATION AND CLOSE CONTACT
 Dealer: 04967 DUNCAN FORD-LINCOLN-MERCURY Origin Desc: FIELD ORGANIZATION
 Odometer: 80000 MI Comm Type: OTHER
 Analyst Name: LINSEY JENSEN (LJENSE11) Analyst: LJENSE11
 Action Date: 03/01/2005 Action Time: 10.48.39.854 Action Date: No

Comments RECALL INFO - DIRECT TO INFORMATION DIRECTORIES

FORD-2005-LC1-11073

3/8/2005

All Action Details for Issue

Print

VIN: 1FTEF17W4V	Year: 1997	Model: F-SERIES	Case: 381640535
Name:	Owner Status: Subsequent	WSD: 1998-10-21	
Symptoms Desc: GENERAL INQUIRIES REQUEST/ NON-VEHICLE RELATED		Primary Phone:	
Reason Desc: CAC RELATED - FM CSR FOLLOWING CONTACT		Secondary Phone:	
Issue Type: 02 INFORMATION	Issue Status: CLOSED		

Action: CALLBACK ADD ADDITIONAL COMMENTS		
Dealer: 04967 DUNCAN FORD-LINCOLN-MERCURY		Origin Desc: US CONCERN CASE BASE
Odometer: 80000 MI	Comms Type: PHONE	
Analyst Name: LEONARD SSONKO	Analyst: LSSONKO	
Action Date: 02/28/2005	Action Time: 15:44:53.639	Action Date: No

Comments: CUSTOMER SAID: -CUST WANTS TO KNOW WHAT RECALLS ARE ON HER VEH. CRC ADVISED: PLEASE ALLOW THE REQUESTED TIME FOR THE FOLLOW UP TO OCCUR SO THAT YOUR ISSUE MAY BE PROPERLY ADDRESSED.

FPOB-000-LC1-1109

3/8/2005

All Action Details for Issue

Print

VIN: 1FTEF17W4VK [REDACTED] Year: 1907 Model: F-SERIES Case: 361640535
Name: [REDACTED] Owner Status: Subsequent WSD: 1986-10-21
Symptom Desc: FIRE/SMOKE SCORCHED/BURNT UNDERHOOD Primary Phone: [REDACTED]
Reason Desc: ICCD - RESOLUTION REQUIRED Secondary Phone: [REDACTED]
Issue Type: 03 CONCERN Issue Status: OPEN
Initial Customer Contact: 02/24/2005

Action: OPEN NAPS CONTACT-PRODUCT LIABILITY
Dealer: 88024 FORD MOTORCOMPANY-FORD DIV Origin Desc: NORTH AMERICAN FLEET SERVICE
Odometer: 00000 MI Comm Type: PHONE
Analyst Name: LOWE (LOWE12),LYNN Analyst: (LOWE12)
Action Date: 02/24/2005 Action Time: 16:48:27.103 Action Date: No

Comments: CVO REC'D A CALL FROM SVC MGR(PETER PETRO)/WDLRSHIP DUNCAN FORD 305-294-6128 REGARDING A VEH THAT CAUGHT FIRE, STATES VEH HAS A RECALL 00S22 FUEL LINE VEH CAUGHT FIRE ON FEB 17,2005 PROPERTY DAMAGE ALLEGED. THERE IS A PREVIOUS CUdle CASE IN THE SYSTEM CASE #361640535. DLRSHIP STATES VEH IS STILL ON THE CUST PREMISES. DLRSHIP STATES FIREDEPT STATES(HOTEST SPOT OF FIRE IS LEFT REAR CORNER OF THE ENGINE COMPARTMENT). CVO IS FAXING ALL INFO TO JULIE SZYMANSKI. CVO WILL INFORM DLRSHIP THAT THIS CASE WILL BE HANDLED IN OGC.

2005-085-LS1-1195

3/8/2005

All Action Details for Issue

Print

VIN: 1FTEH17W4VW	Year: 1997	Model: F-SERIES	Case: 381640535
Name: [REDACTED]	Owner Status: Subsequent	WSD: 1996-10-21	
Symptom Desc: FRESMOKE SMOKE		Primary Phone: [REDACTED]	
Reason Desc: LEGAL - ACCIDENT / FIRE		Secondary Phone: [REDACTED]	
Issue Type: 10 OGC	Issue Status: CLOSED		

Action: CONTACT ADVANCED TO OGC

Dealer: 04967 DUNCAN FORD-LINCOLN-MERCURY

Origin Desc: US CONCERN CASE BASE

Odometer: 80000 MI

Comm Type: PHONE

Analyst Name: SANDRA BARTELLA

Analyst: SBARTELL

Action Date: 02/22/2005

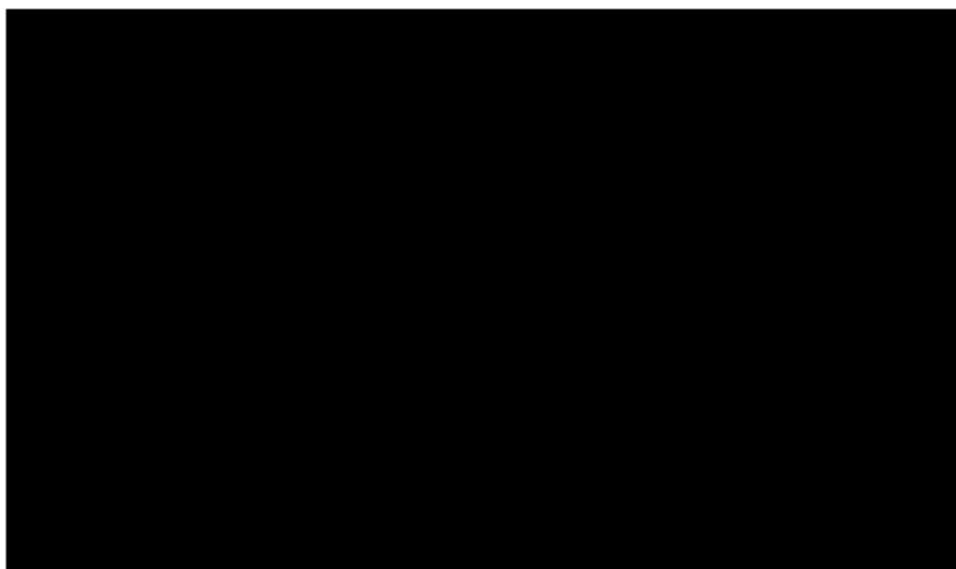
Action Time: 10:02:44.121

Action Data: No

Comments CUSTOMER SAID: _THE VEH CAUGHT ON FIRE FEB/17/2005 AT 3:30AM _THE VEH WAS SITTING SINCE 10:00PM NIGHT BEFORE _SMOKE CAME IN MY APPATMENT AND YOU COULD NOT EVEN BREATH _THE FIRE DEPARTMENT PUT THE FIRE OUT THEY STATED IT MAY HAVE COME UNDER THE HOOD AND THEY ARE DOING FURTHER INVESTIGATION _IT MELTED THE WATERLINES AND PIPES AND UNDERNEATH THE PARKING LOT THERE WAS SMOKE DAMAGE IT CAUSED DAMAGE TO MY APARTMENT BUILDINGS _THE POLICE WERE THERE AND THEY TURNED IT OVER TO THE FIRE DEPARTMENT _DAMAGE THAT WAS CAUSED WERE FOUR APARTMENT BUILDINGS _INSURANCE COMPANY WAS CONTACTED AND WE ARE WAITING ON THEM _FIRE DEPARTMENT ADVISED THERE MAY BE A FSA AND TO LET FORD KNOW ABOUT THIS _I'M CALLING TO LET YOU KNOW WHAT ARE MY NEXT STEPS ?DEALER SAID: DUNCAN FORD - LINCOLN - MERCURY 1818 ROOSEVELT BLVD KEY WEST, FL 33040 DISTANCE: 1.24 MILE STEL: (305) 294-6126 FAX: (305) 294-4536 CRC ADVISED: I WILL FORWARD THIS INFORMATION TO THE FORD OGC DEPARTMENT. YOU WILL BE CONTACTED WITHIN 3-5 BUSINESS DAYS.

E005-005-LC1-1189

3/8/2005

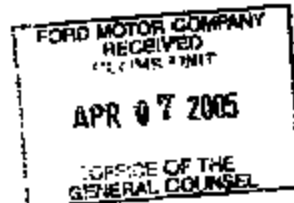




AIG Personal Lines Claims
Charissa Bonaparte, Claims Representative
640 Century Point
Lake Mary
FL 32748
407-829-7545 direct
800-215-7588 ext. 7545 toll-free
407-829-8360 fax
charissa.bonaparte@aig.com

March 28, 2005

Ford Motor Company
Attn: Consumer Affairs
P O Box 6248 Mid-3ne-B
Dearborn, FL 48126



RE: Insured: [REDACTED]
Claimant: [REDACTED]
Claim Number: [REDACTED]
Date of Loss: February 27, 2005
Policy Number: [REDACTED]
Loss Location: [REDACTED] Port St. Lucie, FL

Dear Ford Motor Company:

We represent the above insured for a loss, which occurred on February 27, 2005.

Our investigation indicates that you contributed to this loss. We, therefore, request that you or your liability insurance carrier reimburse us and/or our insured for these damages.

Please forward this letter to your liability insurance carrier or insurance agent and have them contact us immediately.

If you have no insurance coverage please contact us at the number listed above.

We would like to notify Ford Motor Credit of a fire and total loss of a 1998 Ford Expedition Vin # 1FMRU1762W [REDACTED]. We will make the vehicle available for inspection for the next 30 days. The vehicle is at Copart stock # 2568565 at [REDACTED] FL [REDACTED] they can be reached [REDACTED].

Failure to comply with this request may result in legal action against you.

Sincerely,

Charissa Bonaparte Phone: 407-829-7545
Claims Representative
For: THE INS CO OF THE STATE OF PENNSYLVANIA

ENC-625-1C1-1187

5127



Services Provided by Members of
American International Group, Inc.

All Action Details for Issue

Print

VIN: 1FUEF11722M1 [REDACTED] Year: 1998 Model: EXPEDITION Case: 505480605
Name: [REDACTED] Owner Status: Subsequent WSD: 1998-02-28
Symptom Desc: FIRE/SMOKE SCORCHED/BURNED UNDERHOOD Primary Phone: [REDACTED]
Reason Desc: LEGAL - ALLEGED - NON-SERIOUS INJURY Secondary Phone:
Issue Type: 07 LEGAL Issue Status: CLOSED

Action: ADVISE CUST INFORMATION IS FORWARDED TO OUR PRODUCT CLAIMS GROUP
Dealer: 04846 SUNRISE FORD COMPANY Origin Desc: US CONCERN CASE BASE
Odometer: 130000 MI Comm Type: PHONE
Analyst Name: FREELAND, KIM Analyst: KFREELAN
Action Date: 03/01/2005 Action Time: 14.02.25.768 Action Data: No

Comments: CUSTOMER SAID: 08 EXPEDITION CAUGHT ON FIRE. FIRE STARTED AT 12:20PM ON SUNDAY MORNING, FIRE DEPT CAME 40 MINUTES AFTER THEY WERE CALLED. VEHICLE CAUGHT FIRE AND VEHICLE IS NOW TOTALLED. TIRES ARE MELTED OUT ON THE DRIVEWAY. THERE IS NOTHING LEFT. CUSTOMER WANTS TO KNOW IF MY VEHICLE WAS INVOLVED IN THE NEWEST RECALL FORD HAS PUT OUT FOR THE UNDER THE HOOD FIRE? AND TO REPORT THAT HER VEHICLE CAUGHT ON FIRE. DEALER SAID: SUNRISE FORD 5435 SOUTH US HIGHWAY 1 FORT PIERCE, FL 34982. CRC ADVISED: - THIS INFORMATION WILL BE FORWARDED TO OUR CONSUMER AFFAIRS GROUP. SOMEBODY WILL CONTACT IN TWO BUSINESS DAYS. ADVISED CUSTOMER AS PER THIS CASE PATH.

Action: SEND ACKNOWLEDGEMENT LETTER TO CUSTOMER
Dealer: 04846 SUNRISE FORD COMPANY Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION
Odometer: 130000 MI Comm Type: OTHER
Analyst Name: CASSANDRA JONES Analyst: CJONES
Action Date: 03/01/2005 Action Time: 16.27.06.918 Action Data: No

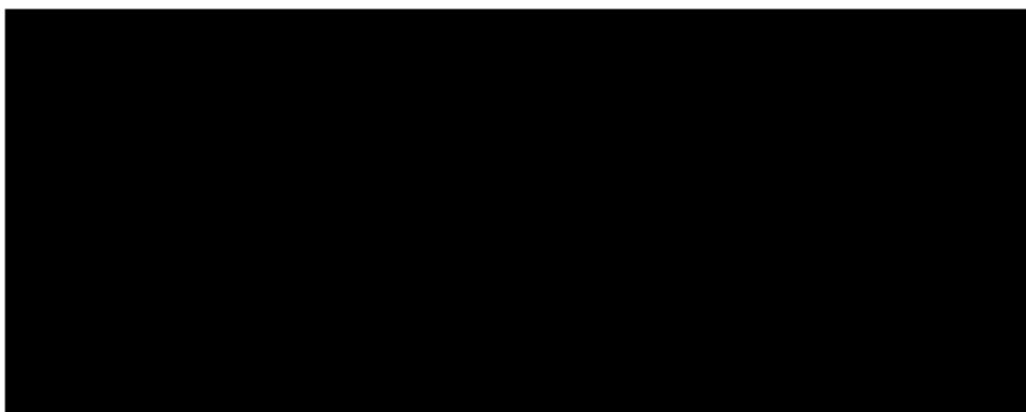
Comments: LPA SPOKE TO CUSTOMER. EXPLAINED THERE ARE NO OPEN RECALLS RELATED TO CONCERNS. GAVE CUSTOMER ADDRESS FOR SUBROGATION REFERRAL.

Action: CLOSING COMMENTS - DENIAL - BASED ON LITIGATION PREVENTION REVIEW
Dealer: 04846 SUNRISE FORD COMPANY Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION
Odometer: 130000 MI Comm Type: OTHER
Analyst Name: CASSANDRA JONES Analyst: CJONES
Action Date: 03/01/2005 Action Time: 16.27.58.771 Action Data: No

Comments: LETTER WILL BE SENT TO CUSTOMER.

EPC-RES-101-1109

4/18/2005



TAX FILE 1/24/2003

255

24th JUDICIAL DISTRICT COURT FOR THE PARISH OF JEFFERSON

STATE OF LOUISIANA

NO. 546-782

DIV. L
JUDGE
Charles A. Fausch

VERSUS

FORD MOTOR COMPANY, THE CITY OF KENNER FIRE DEPARTMENT, THE
CITY OF KENNER, EAST BANK CONSOLIDATED SPECIAL SERVICE FIRE
PROTECTION DISTRICT, STATE FARM INSURANCE COMPANY, ABC
INSURANCE COMPANY AND
XYZ INSURANCE COMPANY

FILED: _____

DEPUTY CLERK

PETITION FOR DAMAGES

The petition of _____ a person of the full age of majority and
domiciled in the Parish of Jefferson, State of Louisiana, through undersigned counsel, with
respect says:

1.

Made defendants herein are:

- A) THE FORD MOTOR COMPANY, (hereinafter referred to as "Ford"), upon
information and belief is a foreign corporation, licensed to do and doing business in the
Parish of Jefferson, State of Louisiana.
- B) CITY OF KENNER FIRE DEPARTMENT (hereinafter sometimes referred to
as Kenner Fire Department), upon information and belief, an entity which is a division of
the City of Kenner and organized under the laws of the State of Louisiana;
- C) THE CITY OF KENNER, a governmental entity organized under the laws of
the State of Louisiana, through Louis Cosgent, in his official capacity as Mayor of the
City of Kenner;
- D) EAST BANK CONSOLIDATED SPECIAL SERVICE FIRE
PROTECTION DISTRICT (hereinafter sometimes referred to as Jefferson Fire
Department), upon information and belief is an entity organized under the laws of the
State of Louisiana;
- E) STATE FARM INSURANCE COMPANY, (hereinafter referred to as "State
Farm") upon information and belief, is a foreign insurance company, licensed to do, and

1

doing business in the State of Louisiana, who at all times pertinent hereto had in full force and effect a liability insurance policy covering the plaintiff, [REDACTED]

[REDACTED] from the type of liability alleged herein;

F) ABC INSURANCE COMPANY, an as yet unknown insurance company that will be subsequently named through discovery, but upon information and belief, is a foreign insurance company, licensed to do, and doing business in the State of Louisiana, who at all times pertinent hereto had in full force and effect a liability insurance policy covering the defendant, City of Kenner Fire Department, from the type of liability alleged herein;

G) XYZ INSURANCE COMPANY, an as yet unknown insurance company that will be subsequently named through discovery, but upon information and belief, is a foreign insurance company, licensed to do, and doing business in the State of Louisiana, who at all times pertinent hereto had in full force and effect a liability insurance policy covering the defendant, East Bank Consolidated Special Service Fire Protection District, from the type of liability alleged herein;

2.

On or about July 19, 2002, plaintiff [REDACTED] parked a Ford F150 pickup truck in a garage which was part of the main structure located at [REDACTED], in Kenner Louisiana, in the Parish of Jefferson, an area within the jurisdiction of the court.

3.

After parking the Ford truck in the garage, the garage became engulfed in flames spreading fire throughout the remainder of the structure and destroying the vehicle.

4.

The City of Kenner's Fire Department was notified and, based on information and belief, took approximately thirty minutes to respond.

5.

The Jefferson Parish Fire Department was also notified and, based on information and belief, upon arrival did not locate a fire hydrant near the structure which delayed extinguishing the fire.

6.

2

Ford Motor Company is liable to the plaintiff pursuant to the Louisiana Product Liability Act ("LPLA"), La.R.S. 9:2800.51, *et seq.* and in particular, La.R.S. 9:2800.54 (A).

7.

Plaintiff avers that his vehicle had a defective characteristic in its construction and/or design, that rendered the vehicle unreasonably dangerous for ordinary anticipated use.

8.

The defendant, Ford, initially and subsequently failed to adequately warn the plaintiff against the vehicle's unreasonably dangerous condition, despite Ford's knowledge of the condition.

9.

Upon information and belief the said defect/unreasonably dangerous condition existed when the vehicle left the custody and control of Ford Motor Company.

10.

Further damage was sustained by the plaintiff due to the negligence of Kenner's Fire Department's failure to respond in a reasonable manner of time.

11.

Kenner's Fire Department's failure to respond in a reasonable time limit is grossly negligent and inexcusable, and was the proximate cause of the plaintiff's property being totally destroyed.

12.

The Kenner City Fire Department is further negligent in the following respects, but not limited thereto, to wit:

- (a) Failure to train;
- (b) Failure to supervise;
- (c) Failure to install adequate devices to locate fire hydrants;
- (d) Failure to extinguish the fire in a timely manner;
- (e) Such other acts or omissions as will be shown on the trial, all of which will be

shown in contravention of the exercise of due care, prudence, and the laws of the State of Louisiana and the Parish of Jefferson which are specially pleaded as if and as though copied in extenso.

13.

The plaintiff, due to the negligence of the Jefferson Parish Fire Department's inability to locate a fire hydrant, sustained further damage and was the proximate cause of the plaintiff's property being totally destroyed.

14.

The Jefferson Parish Fire Department is further negligent in the following respects, but not limited thereto, to wit:

- (a). Failure to train;
- (b.) Failure to supervise;
- (c). Failure to locate fire hydrants;

(d.) Such other acts or omissions as will be shown on the trial, all of which will be shown in contravention of the exercise of due care, prudence, and the laws of the State of Louisiana and the Parish of Jefferson which are specially pleaded as if and as though copied in extensor.

15.

At the time of this accident, the plaintiff had a policy of liability insurance, in full force and effect with State Farm, covering his vehicle from the type of liability alleged herein.

16.

In due course State Farm was fully notified of the plaintiff's claim. In spite of notice State Farm has failed to settle this claim and has violated the terms of LSA-R.S. 22:658 and/or LSA-R.S. 22:1220. Said defendant is therefore responsible to your petitioner for statutory penalties, attorney fees and costs, all as provided in said statutes.

17.

The Kenner City Fire Department is a division and direct extension of The City of Kenner, and therefore, The City of Kenner is liable for the negligent acts and/or omissions of The Kenner City Fire Department.

18.

As a result of the herein above described accident and the defendants' negligence, plaintiff [REDACTED] incurred property damages, depreciation, loss of use, loss of revenue, loss of deductible, emotional pain and suffering, and any and all other damages proven at a trial of this matter as are reasonable under the premises.

19.

The defendants are jointly, severally and solidarily liable to the plaintiffs for the above damages.

20.

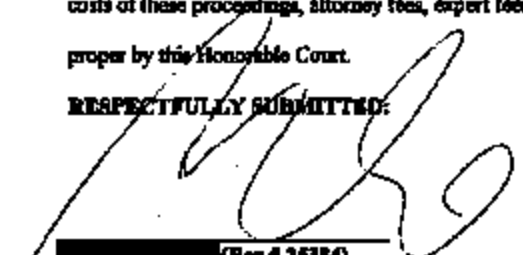
[REDACTED] avers amicable demand without avail.

21.

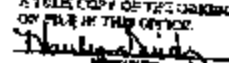
Petitioner reserves his right to trial by jury on all issues.

WHEREFORE, Plaintiff [REDACTED], prays that after due proceedings are had that there be judgment herein in favor of the plaintiff and against the defendants Ford Motor Company, The City Of Kenner Fire Department, The City Of Kenner, East Bank Consolidated Special Service Fire Protection District, State Farm Insurance Company, ABC Insurance Company And XYZ Insurance Company jointly, severally, and in solido, for damages as are reasonable in the premises with legal interest thereon from date of judicial demand and for all costs of these proceedings, attorney fees, expert fees and all general and equitable relief deemed proper by this Honorable Court.

RESPECTFULLY SUBMITTED:


[REDACTED] (Bar # 25384)
Attorney for the Plaintiff
285 West Esplanade Ave., Suite 303
Kenner, Louisiana 70065
Telephone (504) 469-3280
Facsimile (504) 469-3353

PLEASE HOLD SERVICE AS TO ALL DEFENDANTS

A TRUE COPY OF THE ORIGINAL
OF FILE IN THIS OFFICE.

JAMES J. JAMES, CLERK
U.S. FEDERAL DISTRICT COURT
NEW ORLEANS, LA.