

PE06-048

FORD

1/12/2007

APPENDIX E

Index for Lawsuit and Claim
Files

PE06-048
Lawsuit and Non-Litigation Claim Index

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PE06-048

FORD

1/12/2007

APPENDIX E

Lawsuits and Claims
Documents





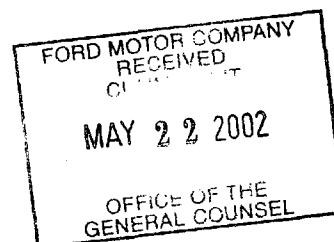
P.O Box 870 * Hernando, MS 38632 **

CONSUMER AFFAIRS
SECTION

May 17, 2002

2 MAY 22 10:54

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



OUR INSURED : [REDACTED]
OUR CLAIM NUMBER : [REDACTED]
DATE OF ACCIDENT : 01-19-2002
AMOUNT : \$19,891.80
PENDING COVERAGES : subrogation

Our insured's property was damaged on the above date. Our investigation indicates that you are responsible for the damage. Investigation indicates that fire originated at the driver's side rear of the engine compartment at the location of the fuel line.

Nationwide has paid for these damages, which gives us the right to recover the full amount of the loss from you, the responsible party.

If you have automobile, homeowner, or any other insurance that will cover this claim, please give us the name of your insurance company and we will make our claim to them. We consider the amount listed above to be payment in full, but will promptly notify you if we incur any additional expenses.

Please complete the bottom portion of this letter and return it within (10) days. If you have automobile insurance we will make our claim directly to them. If you do not have any insurance, please check the appropriate box below. If full payment is not enclosed you will be contacted.

Thank you for your immediate attention in this matter.

Melanie Painter

NATIONWIDE PROPERTY & CASUALTY INSURANCE COMPANY
Melanie Painter
Claims Department
(662) 429-3295

1/19/02
\$19,892.50
101 escape
VIN
27,000

Please provide us with the information below and return this letter.

Name of insurance company _____ Phone No _____
Address _____ Agent Name _____
Policyholder's Name _____ Policy Number _____

☐ I am not insured, my full payment is enclosed.

☐ I am not insured. My social security number is _____ Phone No _____

Signed: _____ Date: _____

NFIRS-1 Basic Form Tracy City Volunteer Fire Dept

31141 FDID	TN State	01/19/2002 Incident Date	1 Station	Tracy City	0000051 Incident	000 Exposure
---------------	-------------	-----------------------------	--------------	------------	---------------------	-----------------

Number/Milepost	Prefix	White City Circle Street or Highway	Street Type	Suffix
Apt./Suite/Room		Tracy City City	TN State	Zip Code Plus 4
Cross Street Directions			1 Street address Location Type	

131 Passenger vehicle fire Incident Type	N None Aid Given or Received
	TN Their Incident Their FDID and State

Alarm Date and Time: 01/19/2002 12:46 Arrival Date and Time: 01/19/2002 12:49 Controlled Date and Time: / / : : Last Unit Cleared Date and Time: 01/19/2002 13:20	N Night Time Shift Shift or Platoon 1 Tracy City District Special Studies Id Special Studies Value
--	---

11 Extinguish Primary Action Taken Additional Action Taken 1 Additional Action Taken 2	<table style="width:100%;"> <tr> <th style="width:30%;">Apparatus</th> <th style="width:10%;">Personnel</th> </tr> <tr> <td>Suppression</td> <td>0</td> </tr> <tr> <td>EMS</td> <td>0</td> </tr> <tr> <td>Other</td> <td>0</td> </tr> </table>	Apparatus	Personnel	Suppression	0	EMS	0	Other	0
Apparatus	Personnel								
Suppression	0								
EMS	0								
Other	0								

Property Loss \$25,000.00	Deaths	Injuries	2 Detector did not alert occupants Detector
Contents Loss \$100.00	Fire Service Casualties 0	0	
Pre-Incident Property Loss \$0.00 (None)	Civilian Casualties 0	0	
Pre-Incident Contents Loss \$0.00 (None)	* No Casualties were reported		
	N None Hazardous Materials Release		

NN Not mixed use Mixed Use Property UU Undetermined Property Use	<table style="width:100%;"> <tr> <th colspan="2">Completed Forms</th> </tr> <tr> <td>(*) Fire - 2</td> <td>() HazMat - 7</td> </tr> <tr> <td>() Structure - 3</td> <td>() Wildland Fire - 8</td> </tr> <tr> <td>() Civilian Fire Cas. - 4</td> <td>() Apparatus - 9</td> </tr> <tr> <td>() Fire Service Cas. - 5</td> <td>() Personnel - 10</td> </tr> <tr> <td>() EMS - 6</td> <td>() Arson - 11</td> </tr> </table>	Completed Forms		(*) Fire - 2	() HazMat - 7	() Structure - 3	() Wildland Fire - 8	() Civilian Fire Cas. - 4	() Apparatus - 9	() Fire Service Cas. - 5	() Personnel - 10	() EMS - 6	() Arson - 11
Completed Forms													
(*) Fire - 2	() HazMat - 7												
() Structure - 3	() Wildland Fire - 8												
() Civilian Fire Cas. - 4	() Apparatus - 9												
() Fire Service Cas. - 5	() Personnel - 10												
() EMS - 6	() Arson - 11												

Person / Entity Involved				
Business Name		Phone Number		
Prefix	First Name	Middle	Last Name	Suffix
Number / Milepost	Prefix	Street or Highway		Street Type Suffix
P.O. Box	Apt. / Room / Suite	Tracy City City		TN State Zip Plus 4

NFIRS-1 Basic Form
Tracy City Volunteer Fire Dept

31141 FDID	TN State	01/19/2002 Incident Date	1 Station	Tracy City	0000051 Incident	000 Exposure
---------------	-------------	-----------------------------	--------------	------------	---------------------	-----------------

Owner											
Business Name					Phone Number						
Prefix		First Name		Middle		Last Name		Suffix			
Number / Milepost		Prefix		Street or Highway				Street Type		Suffix	
P.O. Box		Apt. / Room / Suite		City				State		Zip	Plus 4
Remarks Gulfport, MS Vehicle, Escape 2001, Driving down White City Circle, Car was missing, pulled into driveway, turn engine off turned around and looked at it and vehicle was on Fire. Weather Wet and Cool Equipment Used - 728 Water Used - 500 Gallons Outside City Limits Firemen Responding - Theron Gross, Dewey Layne, Hasekel Meadow, Steve Sabados, Steve Sabados II, Robbie Bateman											
733		Steve C Sabados				Fire Man		Any Truck		01/19/2002	
Officer in Charge						Position or Rank		Assignment		Date	
733		Steve C Sabados				Fire Man		Any Truck		01/19/2002	
Member Making Report						Position or Rank		Assignment		Date	

NFIRS-2 Fire Form **Tracy City Volunteer Fire Dept**

31141 FDID	TN State	01/19/2002 Incident Date	1 Station	Tracy City	0000051 Incident	000 Exposure
---------------	-------------	-----------------------------	--------------	------------	---------------------	-----------------

<i>* Not Residential</i> Estimated number of residential living units in building of origin: 0 <i>whether or not all units became involved</i> <i>* Buildings not involved</i> Number of buildings involved: 0 <i>* None or less than 1 acre</i> Acres burned: 0 (outside fires)	<i>* No on-site materials or products have been specified</i> On-Site Material & Storage Use 1 On-Site Material & Storage Use 2 On-Site Material & Storage Use 3
--	--

UU Undetermined Area of fire origin UU Undetermined Heat source	UU Undetermined Item first ignited Type of material first ignited
---	---

U Cause undetermined after investigation Cause of ignition <i>* No factors contributing to ignition have been specified</i> First factor contributing to ignition Second factor contributing to ignition	Human Factors Contributing to Ignition () Asleep () Possibly impaired by alcohol or drugs () Unattended person () Possibly mentally disabled () Physically disabled () Multiple persons involved () Age was a factor
--	---

<i>* No equipment was involved in ignition</i> Equipment Involved in Ignition Brand Model Serial # Year Equipment Power Source	Equipment Portability Fire Suppression Factor (1) Fire Suppression Factor (2) Fire Suppression Factor (3)
---	---

3 Involved in ignition and burned Mobile Property Involved			
11 Passenger car. Mobile Property Type	FO Ford Mobile Property Make	2001 Year	
Escape Mobile Property Model	1111111 License Plate Number	MS State	111111111 VIN Number

A Privileged and Confidential Report

Prepared For

**Nationwide Insurance Company
c/o Mr. Sam Bell**

Insured

[REDACTED]

Policy Number

[REDACTED]

Claim Number

[REDACTED]

**TechniFire Number
020212-05-D-4360**

TechniFire Services Company LLC

Insured:**Policy Type:**

Auto Coverage

Date of Loss:

January 19, 2002

Loss Location:

Tracy City, TN

Risk Information:**Make:**

Ford

Model:

Escape

Year:

2001

VIN:

1FMCU03151K [REDACTED]

Mileage:

- 27,000 per insured

Notes:

The insured reported to Nationwide Insurance Company that the vehicle was being driven and had just turned in the driveway. The vehicle started sputtering and missing and white and gray smoke was visible under the hood area. The insured reportedly lives in Mississippi and was visiting his brother in Tracy City, Tennessee.

File History

Glenn Aslinger is the assigned investigator representing TechniFire Services Company.

On February 12, 2002, this file was established under the direction of Mr. Sam Bell, who represents Nationwide Insurance Company in Knoxville, Tennessee.

On February 13, 2002, the vehicle was examined at SadiSCO in Chattanooga, Tennessee.

On February 13, 2002, a verbal report was provided to Mr. Sam Bell.

During the investigation:

- a) the vehicle was examined for cause and origin determination; and
- b) information was provided by Mr. Sam Bell.

Instructions Received:

The following instructions were provided upon receipt of this assignment:

Conduct salvage inspection for C & O

Persons referred to in this report:

Mr. Sam Bell

Insured
Nationwide
Insurance Co.

Origin and Fire Spread

The fire began on the interior of the motor compartment at the driver's side rear of the engine at the location of the fuel line. Flame development included gasoline released from the failed fuel line with subsequent ignition by an arc or spark generated from the operating engine. Fire spread throughout the motor compartment with the ignition and burning of adjacent plastic and rubber components. Flames also extended through the firewall at the center interior dash. The fire was extinguished with major flame development confined to the motor compartment area.

Fire Causation

The fire was caused by the failure of the fuel line with subsequent release of fuel into the operating motor compartment. The opinion as to the fire cause is based on the following:

- 1) Fire flow and demarcation patterns on motor components, firewall, fender well and hood indicating the fire began at the driver's side rear of the engine at the location of the fuel line.
- 2) Burn and char patterns on motor components, firewall, dash, fender well and hood indicating the fire began at the driver's side rear of the motor compartment at the location of the fuel lines.
- 3) Oxidation and demarcation patterns on firewall, fender well, hood and motor components indicating the fire began at the location of the fuel line.
- 4) Melting and degradation of plastic, rubber and aluminum components indicating the fire began at the driver's side rear of the motor compartment at the location of the fuel line.
- 5) The elimination of other potential causes.
- 6) Information provided by the insured to Nationwide Insurance Company.

Evidence Obtained During the Salvage Examination**By this Investigator**

Engine oil and automatic fluid samples were removed and are currently stored at TechniFire's office in Chattanooga, Tennessee.

By other Investigators/Agents

There was no indication that any evidence had been removed by others prior to my vehicle examination.

INSPECTION SUMMARY**Exterior**

The most extensive damage to the exterior of the vehicle occurred at the areas adjacent to the motor compartment including fenders, hood, grill and windshield areas. All four tires and wheels were on the vehicle when the fire occurred. There was no indication that any exterior component had been removed from the vehicle prior to the fire.

Undercarriage

The most extensive damage to the undercarriage area occurred adjacent to the motor compartment and is the result of drop-down burning occurring at the driver's side rear of the motor compartment. There was no indication the fire began at the undercarriage area.

Motor Compartment

The motor compartment was extensively damaged as a result of the fire. The most extensive damage occurred at the driver's side rear of the engine at the location of the fuel line. All components of the motor compartment appear to have been in their appropriate locations at the time the fire occurred. Damage configuration within the motor compartment indicates a failure at the fuel line resulting in the release of gasoline into the motor compartment with subsequent ignition by an arc or spark generated by the operating engine.

Passenger Compartment

The passenger compartment was damaged as a result of the fire. Flames extended through the firewall at the center of the interior dash resulting in the ignition and burning of plastic and upholstery of the dash. The doors were closed and the windows were in the "up" position. All components of the passenger compartment appear to have been in their appropriate locations at the time the fire occurred. The damage configuration within the passenger compartment does indicate the fire's development at the driver's side rear of the motor compartment extending through the firewall into the center interior dash.

SYSTEMS

Electrical

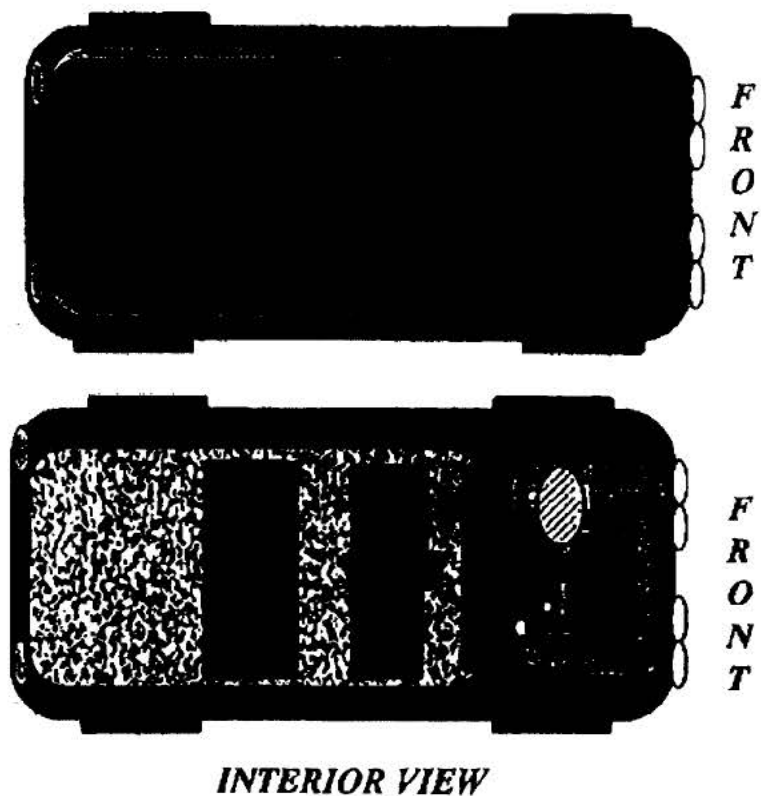
Both the primary and secondary electrical systems were connected when the fire occurred. The battery was found in the motor compartment. There was no indication of a failure or potential fire cause at the battery or primary wiring. Secondary wiring within the motor compartment as well as passenger compartment was damaged as a result of exposure to heat and flame. There is no indication that a failure of the electrical system resulted in the fire.

Fuel System

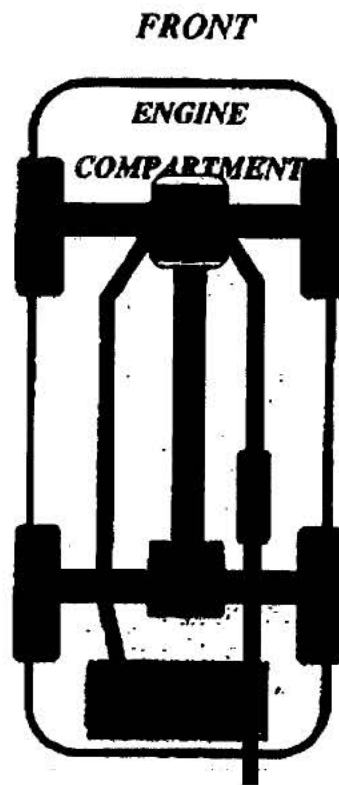
The fuel tank and rigid lines extending to the motor compartment were intact at the time the fire occurred. A flexible section of fuel line extending from approximately the driver's side frame to the fuel rail was missing. A potential failure at the coupling for flexible line is the cause of the fire.

Drive Train

The motor oil level was full as indicated on the dipstick. The automatic transmission fluid level was within the acceptable range. All components of the drive train were in their appropriate locations and externally appeared to be operable.



INTERIOR VIEW



UNDERSIDE VIEW

Note: Not to scale. This diagram is for illustration only and may not accurately represent the vehicle's dimensions, components, or accessories.



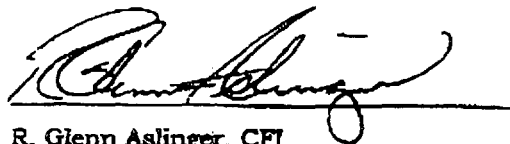
Area of Origin

TechniFire Services Company

Investigator: R. Glenn Aslinger, CFI

Insured: [REDACTED]
DOL: January 19, 2002
Policy No.: [REDACTED]
Claim No.: [REDACTED]
TechniFire No: 020212-05-D-4360

Submitted this 4TH day of March, 2002.



R. Glenn Aslinger, CFI

TechniFire Services Company
 P. O. Box 17356
 Chattanooga, TN 37415
 (423) 876-1700



Mr. Sam Bell
Nationwide Insurance Company
100 South Campbell Station Rd.
Knoxville, TN 37922

Invoice 1-4360
Federal Tax ID: 62-1771209
Date: 3/4/2002

Service Invoice

DESCRIPTION		AMOUNT
Insured: [REDACTED]		
Policy No.: [REDACTED]		
Claim No.: [REDACTED]		
TechniFire No.: [REDACTED]		
Vehicle fire analysis		750.00
Our legal name is TechniFire Services Company, LLC.		
Our Federal Identification Number is 62-1771209.		
Please make checks payable to TechniFire Services Company, LLC.		
Thank you for the opportunity to be of service. If you need additional information regarding this file, or have a question about the report, please contact our office at (423) 876-1700.		
Total		\$750.00

*** TOTAL PAGE.009 ***



Photo Information

1. Front and passenger side of vehicle.(1A)



Photo Information

2. Rear and passenger side of vehicle.(2A)



Photo Information

3. Rear and driver's side of vehicle.(3A)



Photo Information

4. Front and driver's side of vehicle.(4A)



Photo Information

5. The fuel cap was in place at the time the fire occurred.(7A)



Photo Information

6. The vehicle identification number located at the driver's side left of the dash.(24A)



Photo Information

7. View of the interior of the passenger compartment at the rear cargo area.(9A)



Photo Information

8. View of the rear seating area at the interior of the passenger compartment.(6A)



Photo Information

9. View of the front seating area at the interior of the passenger compartment.(11A)



Photo Information

10. View of the interior dash from the driver's side of the vehicle.(14A)



Photo Information

11. View of the interior dash from the passenger side of the vehicle.(10A)



Photo Information

12. View of the center console and steering area at the center dash.(12A)



Photo Information

13. View of the front grill and hood area of the motor compartment.(5A)



Photo Information

14. View of the underside of the vehicle hood.(26A)

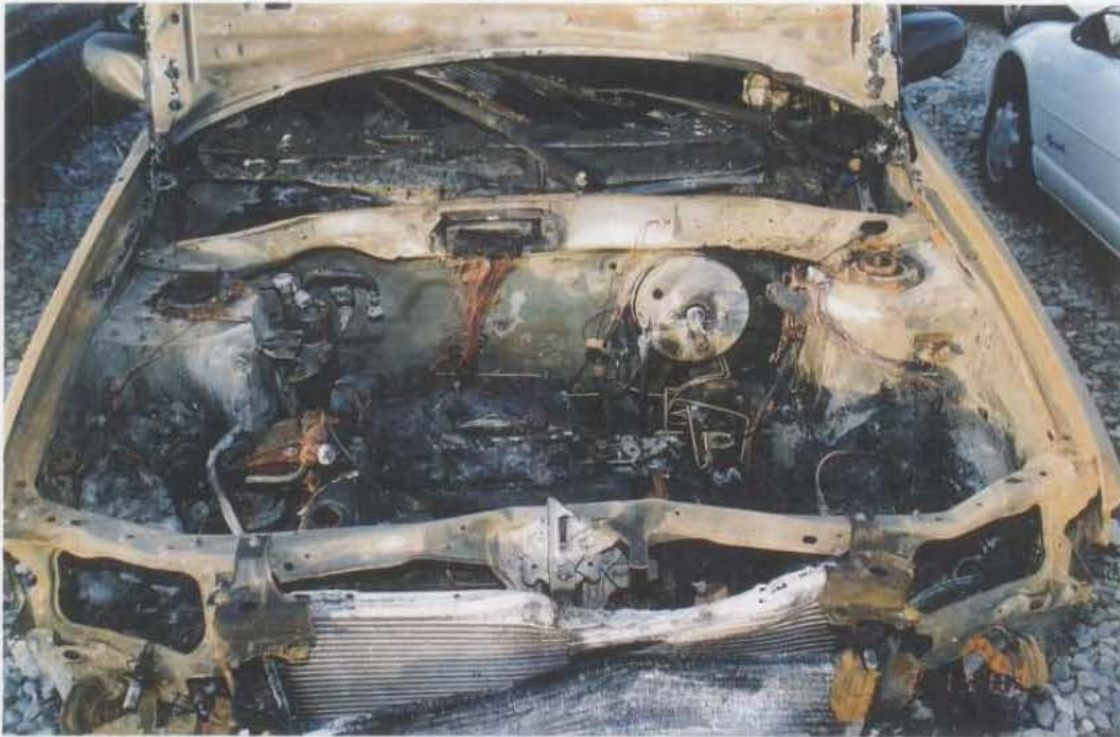


Photo Information

15. View of the motor compartment area.(15A)



Photo Information

16. View of the motor compartment from the passenger side of the vehicle.(16A)



Photo Information

17. View of the motor compartment from the driver's side of the vehicle.(17A)



Photo Information

18. The battery remains were found in the motor compartment. There is no indication of a failure or potential fire cause at the battery or primary wiring.(18A)



Photo Information

19. The motor oil level was full as indicated on the dipstick.(29A)



Photo Information

20. The automatic transmission fluid level was within the acceptable range.(20A)



Photo Information

21. The area at the driver's side rear of the motor compartment. Melting and degradation of plastic, rubber and aluminum components indicate the fire occurred at the driver's side rear of the engine at the location of the fuel lines.(19A)



Photo Information

22. Close up view of the fuel line at the driver's side rear of the engine.(21A)



Photo Information

23. Close up view of the fuel line coupling at the fuel rail.(22A)



Photo Information

24. View of the rigid fuel line extending along the driver's side frame into the motor compartment area.(23A)



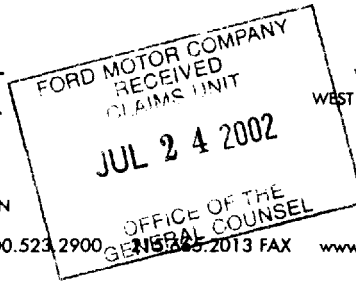
PHILADELPHIA
ATLANTA
CHARLOTTE
CHERRY HILL
CHICAGO
DALLAS
LAS VEGAS
LONDON
LOS ANGELES



A PROFESSIONAL CORPORATION

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SAN DIEGO
SAN FRANCISCO
SEATTLE
WASHINGTON, DC
WEST CONSHOHOCKEN
WILMINGTON



Mark E. Utke
Direct Phone 215.665.2164
mutke@cozen.com

July 19, 2002

CERTIFIED AND U.S. MAIL

Office of the General Counsel
c/o Ford Motor Company
Park Lane Towers West, Suite 400
3 Parklane Boulevard
Dearborn, MI 48126-2568

Re: [REDACTED]
D/L: 7/5/02
Location: [REDACTED] Colliers, WVA
Our File No. To Be Assigned

Dear Sir or Madam:

Please be advised, this office represents Allstate Insurance Company, the property insurance carrier for [REDACTED]

On July 5, 2002, the Araciches experienced a fire which destroyed their home. Initial investigation reveals that this fire started in a 2002 Ford Escape which was parked in the homeowners' garage. The damages sustained are in excess of \$200,000.00.

Please be advised, it is my intention to hold Ford Motor Company responsible for reimbursement of any proceeds which are paid as a result of this fire on behalf of Allstate Insurance Company. In that regard, I request that you immediately contact my office to further discuss this matter. In addition, should you desire to inspect the fire scene, I request that you immediately contact my office to make appropriate arrangements for such a site visit. The site will not remain in its current condition for an indefinite period of time.

Thank you for your cooperation in this matter.

Very truly yours,

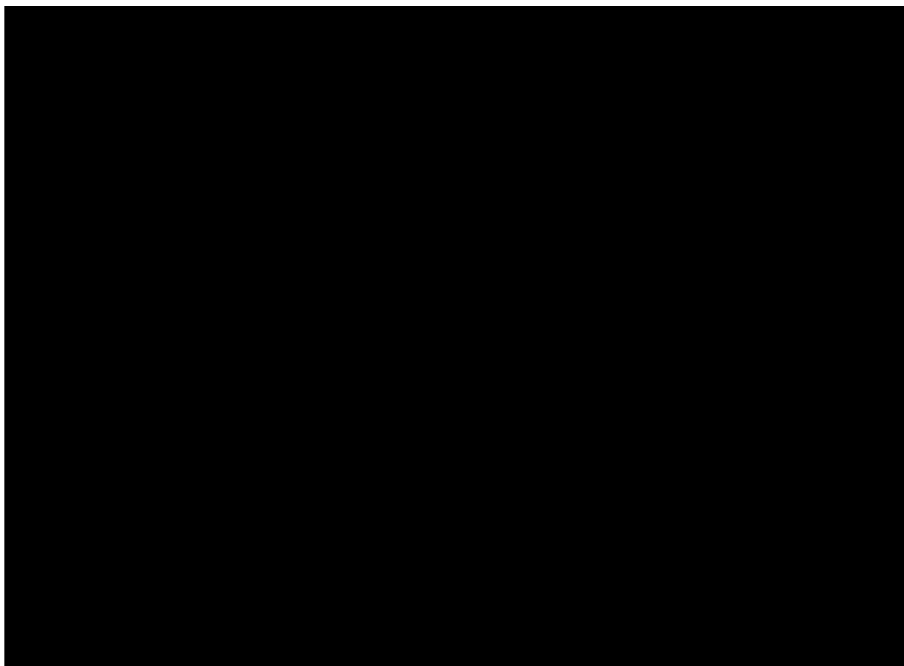
COZEN O'CONNOR

MARK E. UTKE

MEU/ada

1669547\1 099994.000

PE06-048-0027LC



State Farm Fire and Casualty Company



June 03, 2003

RECEIVED

JUN 06 2003

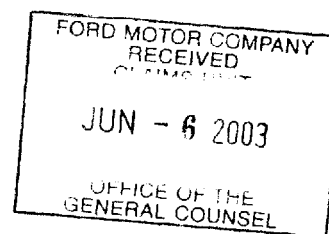
P.O. Box 11040
1825 S. Val Vista Dr.
Mesa, AZ 85214

Phone: (480)497-7300
Fax: (480)497-7365

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

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

RE: Claim Number: [REDACTED]
Our Insured: [REDACTED]
Date of Loss: May 23, 2003
Make, Model & Year: Ford Escape – 2001
VIN: 1FMYU04141K [REDACTED]



To Whom It May Concern:

The identified 2001 Ford Escape is insured by State Farm Fire and Casualty Company. This 2001 Ford Escape experienced a fire on May 23, 2003.

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

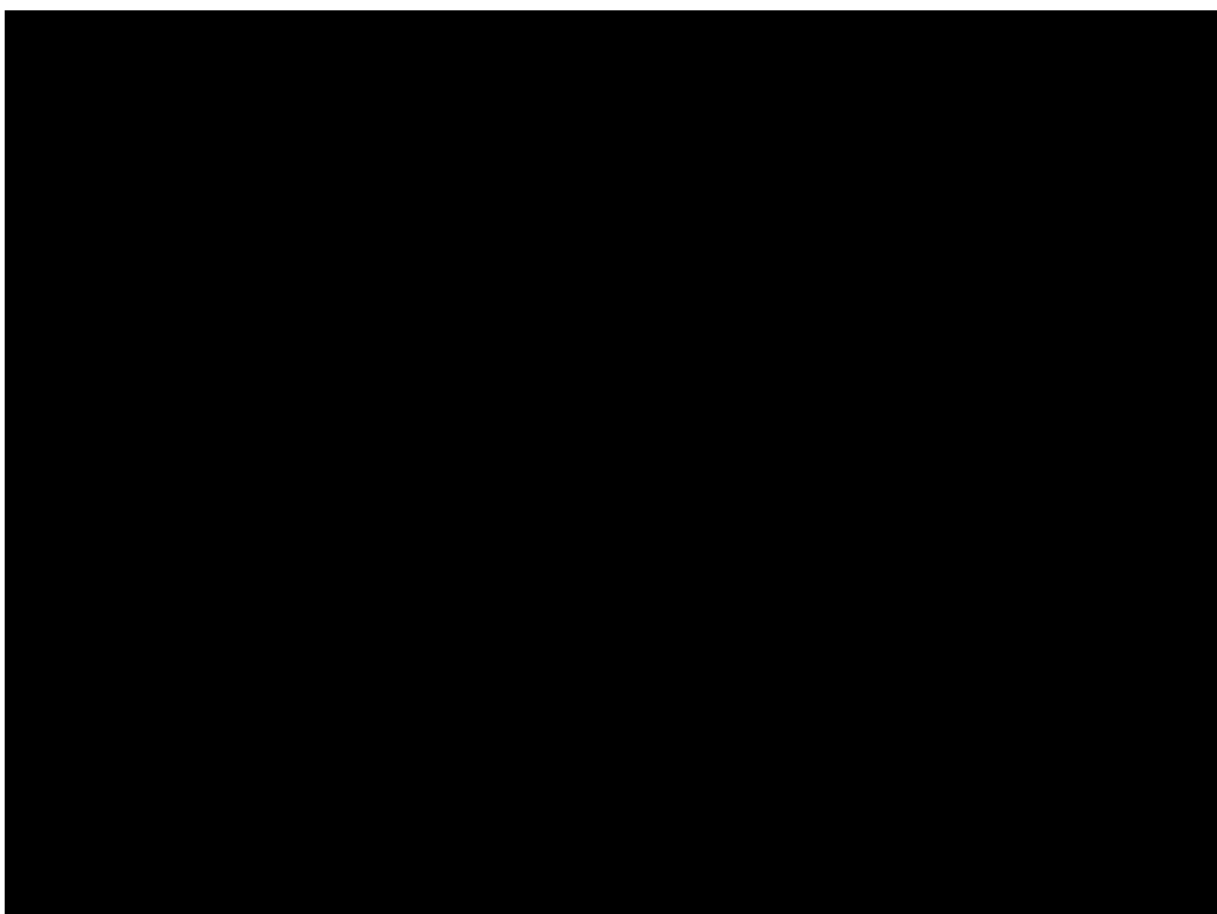
Please contact me at 480-497-7383 to set up a time for your inspection.

Sincerely,

Lisa O'Brien
Claim Representative
480-497-7383

cc: Five Star Ford
7100 E. McDowell Rd
Scottsdale, AZ 85257

5/23/03
- '01 Escape
- VIN



Do you or anyone else have additional insurance on this vehicle? ☐ Yes ☒ No

If yes, who? (name, address, phone #) Do have Ford's GAP care

Name of other insurance company/agent into unknown 800-521-2774

Any other vehicles in your household? ☒ Yes ☐ No Name of insurance company and agent on these other vehicles Progressive - same policy

Your prior insurance company and agent _____

Membership AAA or other road service club? ☐ Yes ☐ No

Club name (Ford's) Roadside Assist Member # unknown

IV. VEHICLE EQUIPMENT (check box if vehicle had any of the following, indicating purchase price/date)

☒ Power windows	☒ Power mirrors	☒ Driver-side air bags	☐ Std. transmission
☒ Air conditioning	☐ Driver-side power seat	☒ Passenger-side air bags	☒ Automatic transmission
☐ Cellular phone make _____	☐ Passenger-side power seat	☒ Tilt steering wheel	☐ Electrical/manual trunk release
☒ Cruise control	☐ ABS brakes	☐ Tinted glass	☒ Luggage rack
☒ Alarm system <u>unknown</u>	☒ Stereo AM/FM	☐ T-tops	☒ Aluminum/alloy wheels
☐ Passive <u>Ford's</u>	☒ Cassette	☐ Factory	☐ Factory
☐ Non-passive	☒ CD player	☐ After market	☐ After market
Brand type _____	CD player mounting Location _____		Make _____
☐ Leather interior	☐ All-wheel drive	☒ Power door locks	☐ Convertible top
	☒ 4x4	☒ Remote/keyless entry	☐ Sun roof

If cellular phone was checked, list phone # and servicing co. _____

Was all equipment/accessories operational prior to loss? ☒ Yes ☐ No If no, describe _____

Rear driver side door handle was broke

V. VEHICLE CONDITION (Other Distinguishing Features — Dents, decals, trailer hitch, interior, etc.) Prior to Loss

	Poor	Fair	Good	Excellent	DESCRIPTION	NEW	REBUILT
Paint				☒	<u>few minor scratches</u>		
Transmission				☒			
Engine				☒			
Body				☒			
Tires				☒			

1. Who performs routine maintenance service? Ford Liberty / Frank Auto Date last serviced unknown

2. Date of last repair work unknown By whom? Ford Liberty

3. Type of repair completed? unknown

4. Who performed current state emission test? NA

Date last inspected NA

5. Who performed last state inspection? NA

Date last inspected NA

6. Pre-insurance inspection completed? ☐ Yes ☒ No If yes, by whom? _____

VI. Date vehicle purchased/leased? 10/6/01 ☒ New ☐ Used Purchase price \$ 21,929.96

Name, address, & phone # of dealer or individual you purchased vehicle from Liberty Ford -

Southwest 6600 Pearl Rd Parma OH 44130 (440) 838-2600

Trade in vehicle 2001 Chevy Trade in allowance \$2000 How did you learn vehicle was for sale/lease? paper

How was vehicle paid for? ☐ Cash ☐ Check ☒ Financed ☐ Other-Explain _____

Mileage on vehicle at time of purchase/lease 18

At time of purchase was the vehicle

damaged? ☐ Yes ☒ No If yes, describe _____

Seven Hills OH 44131

If financed/leased - name, address, phone # of company Ford Credit 5700 Lombard Ave

Account # [redacted] At the time of fire, balance due \$ 20,519 Loan term (months) 60

Monthly payment \$ 530.60 Date last loan payment made 5-10-03 Is account past due? ☐ Yes ☒ No

If yes, how long? NA If vehicle leased, length of lease NA What is turn-in date of lease? NA

Have you offered vehicle for sale or trade? ☐ Yes ☒ No When? _____ How much? _____

Any offers? ☐ Yes ☒ No Who? _____

How long was it for sale or trade? _____ Are keys in your possession? ☒ Yes ☐ No

How many sets of keys? 2 Who has them? me & Ford

Were all keys accounted for at time of fire? ☒ Yes ☐ No If no, explain _____

OH REV. CODE §2913.47

"ANY PERSON WHO, WITH INTENT TO DEFRAUD OR KNOWING THAT HE IS FACILITATING A FRAUD AGAINST AN INSURER, SUBMITS AN APPLICATION OR FILES A CLAIM CONTAINING A FALSE OR DECEPTIVE STATEMENT IS GUILTY OF INSURANCE FRAUD."

This affidavit must be signed, notarized, and returned by mail to a Progressive Insurance claims office.

Signed [redacted] Signature Individual Completing Affidavit

Witness [redacted] Witness Address Bedford, OH

Subscribed and sworn to before me this 17 day of May, Year 2003

Licensed Notary - State Of Ohio Personally Known ☒ Identification Produced ☒

Identification (seal)

Form No. 2201 (9/97) OH

PE06-048-0031LC



5255 Commerce Parkway West • Parma • OH • 44130
Phone: (440)887-0645 • Fax: (216)398-7202

June 2, 2003

Progressive Insurance Company
30440 Lakeland Boulevard
Wickliffe, Ohio 44092

ATT: Mr. Jim Selvaggio

RE:	INSURED:	[REDACTED]
	TYPE OF VEHICLE:	2002 Ford Escape
	DATE OF LOSS:	May 5, 2003
	CLAIM NO:	[REDACTED]
	OUR FILE NO:	OR273

Dear Mr. Selvaggio:

This is a preliminary report with regard to the fire origin and cause evaluation of a 2002 Ford Escape bearing short VIN [REDACTED]. Examination of the subject vehicle took place on May 16, 2003, at Liberty Ford situated on Broadway Avenue in Bedford, Ohio.

During the evaluation, no destructive testing was performed with the exception of the removal of the left front headlight so that a clear view of the fire-damaged area could be observed. Destructive testing did not take place due to the fact that a third party evaluation is anticipated in this matter. Should a third party evaluation become necessary, please contact my office, and arrangements can be made so that all parties can be present during destructive testing.

During the evaluation of this vehicle, full photo documentation was performed. Any photographs not used in this report will be maintained in the file for a period of up to ten (10) years. Should further photo documentation become necessary, please contact my office and arrangements will be made.

Examination of the subject vehicle began by verifying that the VIN number found on the Federal Identification Sticker, seen in Figure No. 1, matched the VIN supplied by your office. The VIN did match and positively identified the subject vehicle. At this point I proceeded with my inspection.

FIGURE #1

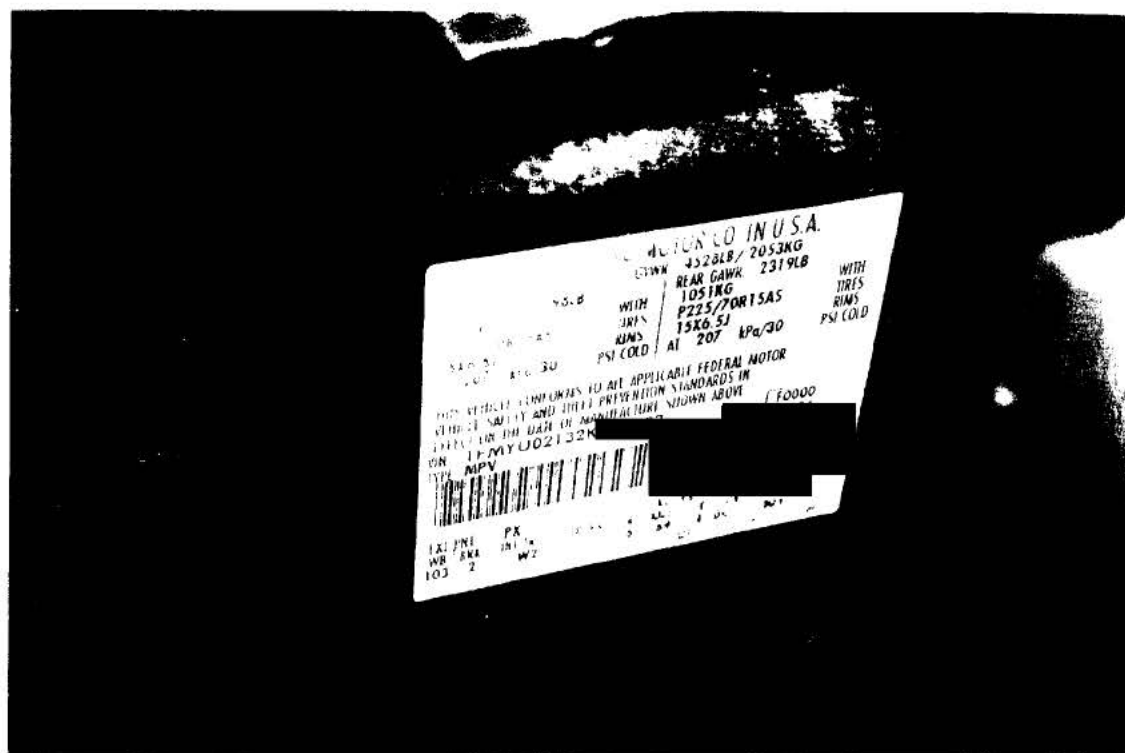


Figure No. 2 shows a right side view of the subject vehicle. Examination revealed no evidence of collision damage that may have caused or contributed to the vehicle fire. The right side of the vehicle did not show any evidence of fire damage.

FIGURE #2



Figure No. 3 shows a view across the hood and left fender of the vehicle as seen from the left fender area. The fire damage appeared to be at and around the left side of the vehicle near the area of the battery and the power distribution center. The fire damage was isolated to the engine compartment of the vehicle.

FIGURE #3



Figure No. 4 shows a view of the left front of the subject vehicle as seen from the left front bumper area. This photograph exhibits fire damage to the fender, hood and core support area..

FIGURE #4



Figure No. 5 shows the remainder of the left side of the vehicle, exhibiting no evidence of collision damage.

FIGURE #5



Figure No. 6 shows a view of the forward passenger compartment. No evidence of fire intrusion into the passenger compartment was found. I found that the radio in the subject vehicle was factory-installed. I did not find any evidence of aftermarket components installed in the passenger compartment of the vehicle.

FIGURE #6



Figures No. 7 through 10 show various views of the fire-damaged zone. As previously mentioned, the fire damage was predominantly to the left forward quadrant of the vehicle. Fire damage did not extend to the right side of the vehicle. The burn patterns would give indication that the fire was more predominant in the forward portion of the engine compartment near the battery and electrical distribution center with damage mitigating toward the rear engine compartment.

FIGURE #7



FIGURE #8

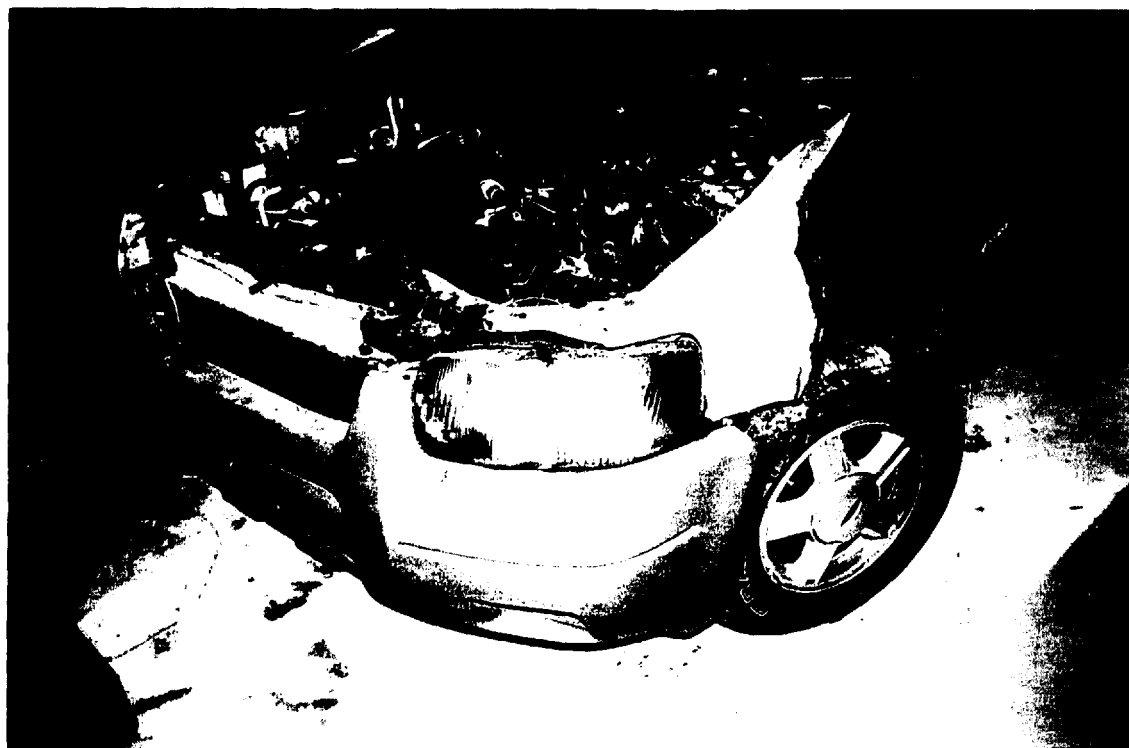


FIGURE #9



FIGURE #10



Figure No. 11 shows a view across the engine compartment as seen from the left side. It was found that the air filter housing was consumed, as were portions of the air filter snorkel. The battery showed heavy directional burn damage on the outer face toward the left fender, mitigating toward the inside of the vehicle. The fire damage was more significant in the forward engine compartment near the battery and power distribution center. The damage mitigated toward the rear of the engine compartment. Please note that plastic and combustible components, such as the master cylinder reservoir, were still in place in the rear portion of the engine compartment, while damage was heavy in the forward engine compartment area.

FIGURE #11

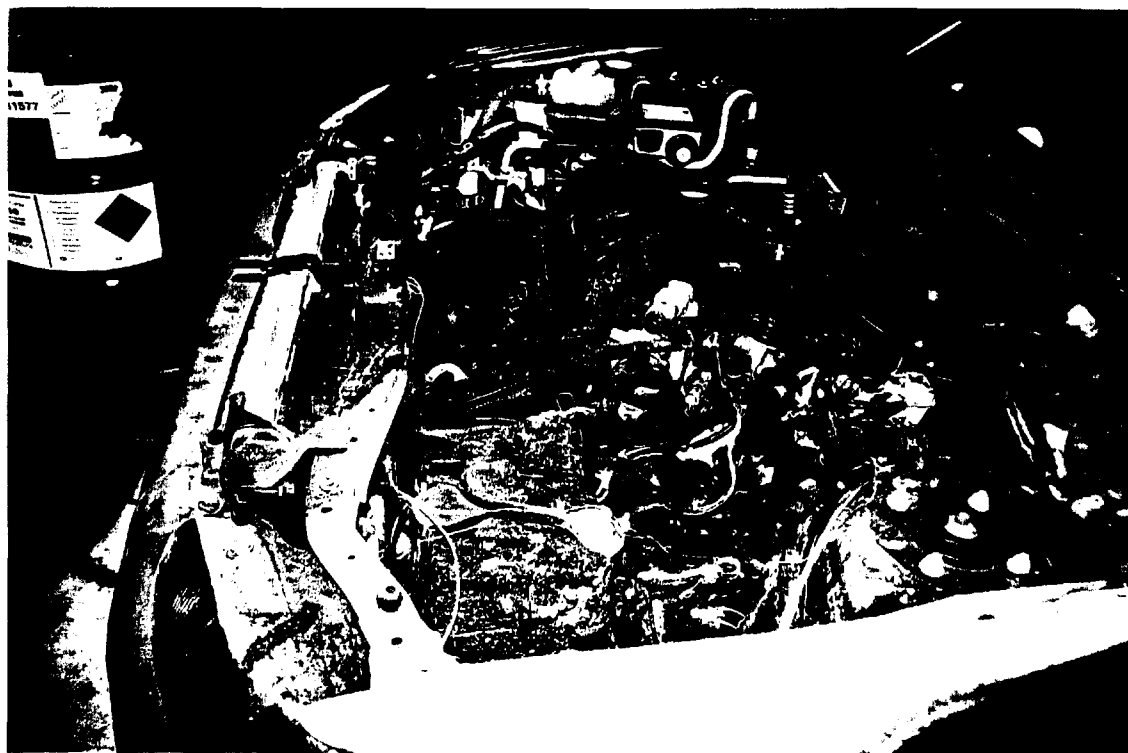


Figure No. 12 shows a view of the fire-affected zone as seen from the left front bumper area. In this photograph, you will note that the heaviest area of damage was at and around the battery and power distribution center. The damage to the battery itself was more significant on the fender side and less significant on the inside face. The damage to the upper portion of the battery was also more significant on the fender side and mitigated toward the left, indicating rollover progression at and around this area. The core support burn damage ended slightly inward of the battery. The fire damage to the actual engine compartment diminished significantly toward the mid section of the engine compartment. The fire damage at and around the rear bulkhead was primarily on the left side of the vehicle with no exhibited damage toward the mid and right side.

FIGURE #12



Figure No. 13 shows the air filter remains that were found on the cowl of the vehicle at the time of my inspection.

FIGURE #13



Figure No. 14 shows a view from above the fire-affected zone. Please note that the most heavily damaged area was at and around the inside face of the battery and the power distribution center. The air filter housing is in close proximity to these components.

FIGURE #14

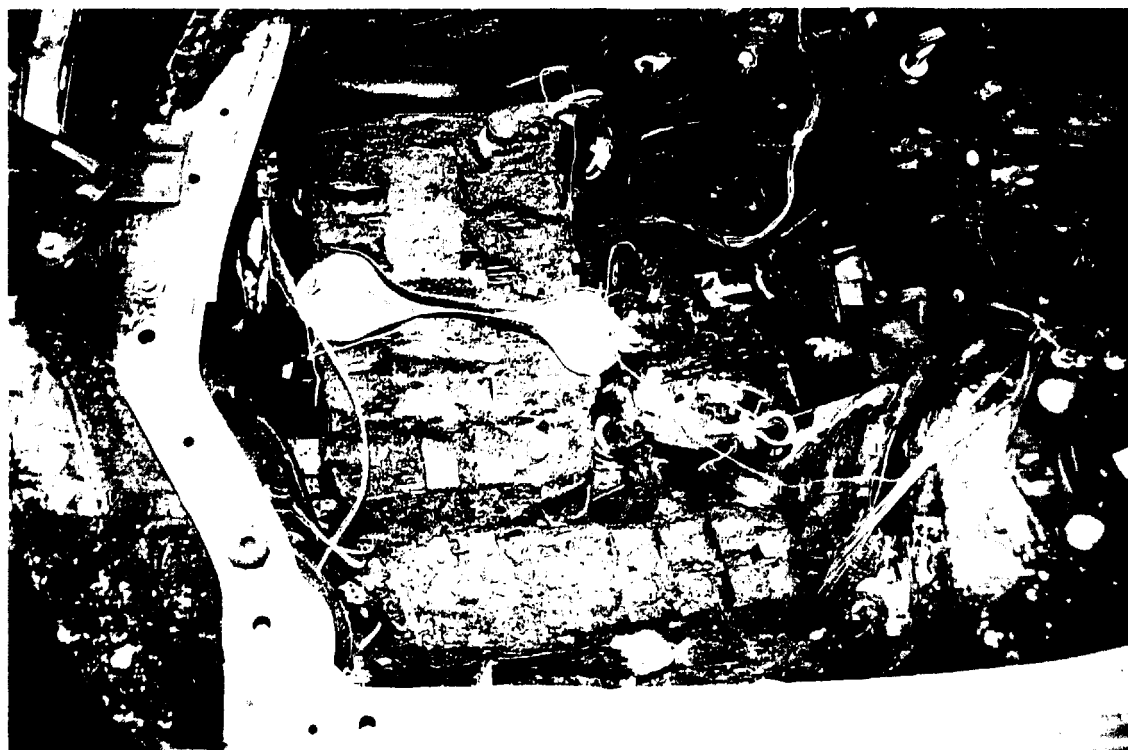


Figure No. 15 shows a view of the left rear engine compartment. The damage was significantly less in this area. Fuel lines did become involved in the vehicle fire, which added fuel load to the rear portion of the engine compartment. The fuel lines became involved later in the progression of fire as the damage is much less significant in this area compared to the front.

FIGURE #15



Figure No. 16 shows a view of the right side engine compartment, exhibiting minimal damage.

FIGURE #16

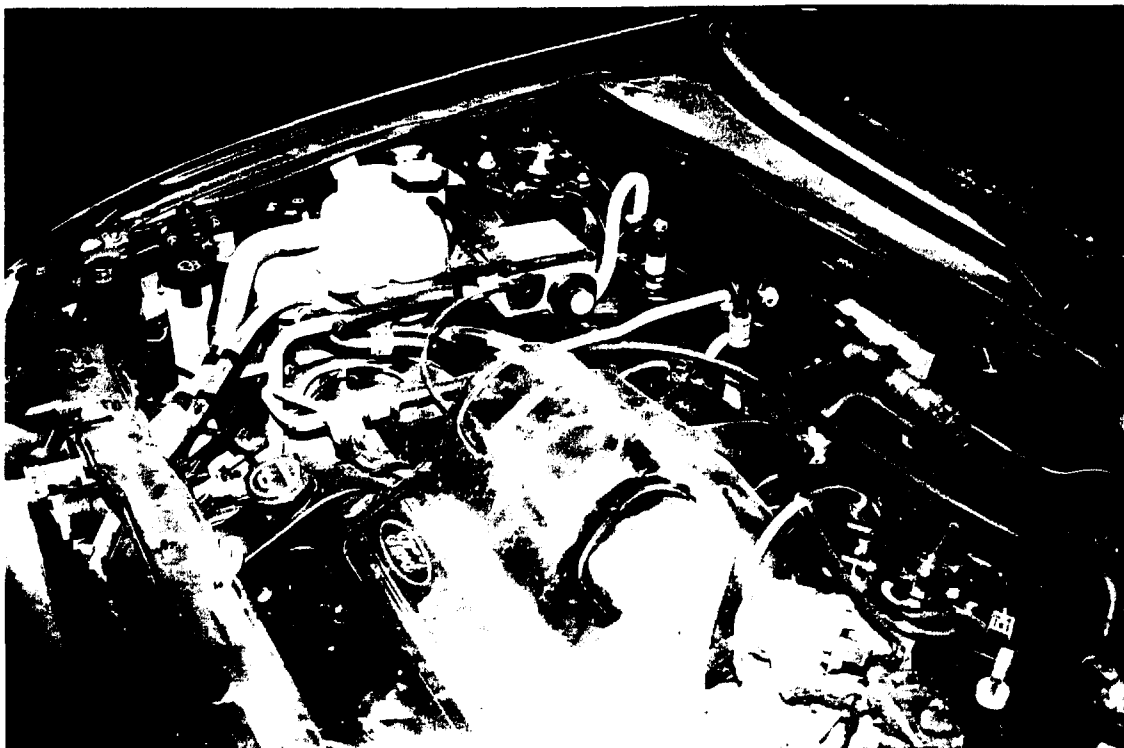


Figure No. 17 shows a closer view of the heavily damaged battery side and power distribution center. Please note that both positive terminals on the power distribution center were void of any plastic covering over them. The battery is melted very significantly in this area.

FIGURE #17



Figure No. 18 shows a view of the power distribution center as seen from the front of the vehicle. The damage to this area mitigated toward the rear portion of the engine compartment. The primary amount of fire damage to the power distribution center was in the forward portion of the compartment near the battery.

FIGURE #18

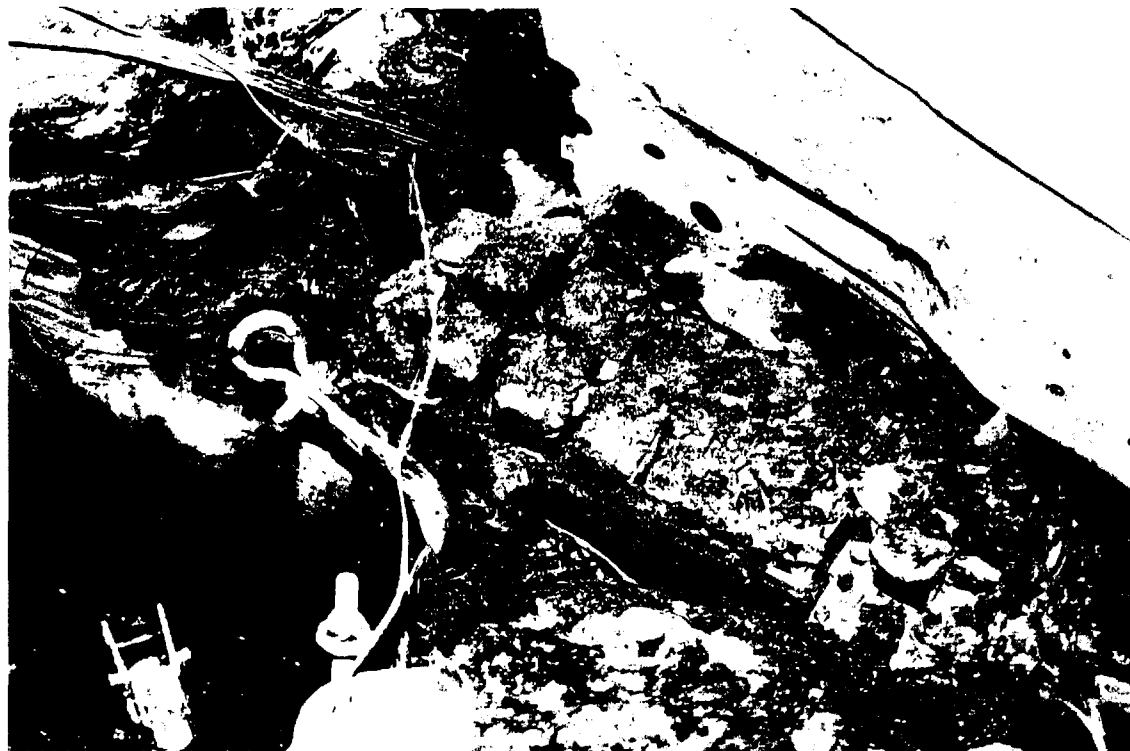


Figure No. 19 shows a view of the front face of the battery as well as the wiring harnesses routed in the forward portion of the engine compartment, as seen through the headlight opening. The burn patterns found in this area erupted from below the power distribution center in a typical upward and outward progression.

FIGURE #19

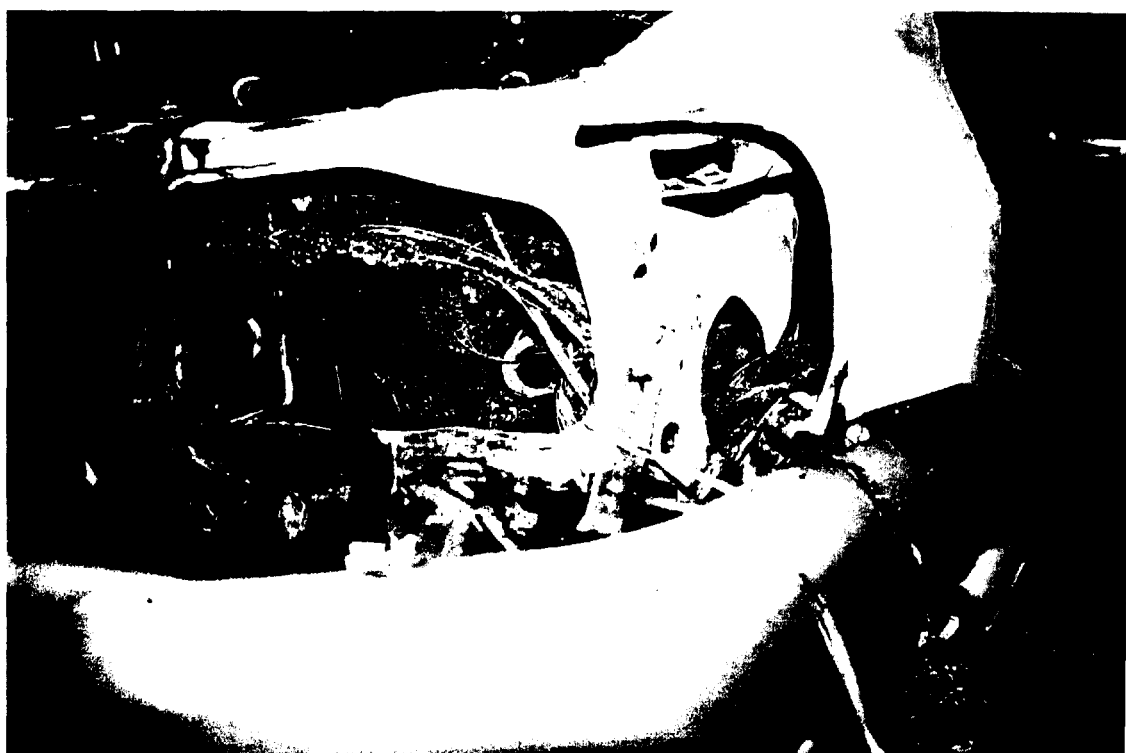


Figure No. 20 shows a view of the underside of the forward portion of the power distribution center. This area was heavily affected by fire damage. Evidence of wire beading and separation was also present in this area. It would appear from the initial evaluation that an electrical fire has taken place in this area. Destructive testing was not performed at this time so that an evaluation by all available parties can be scheduled.

FIGURE #20

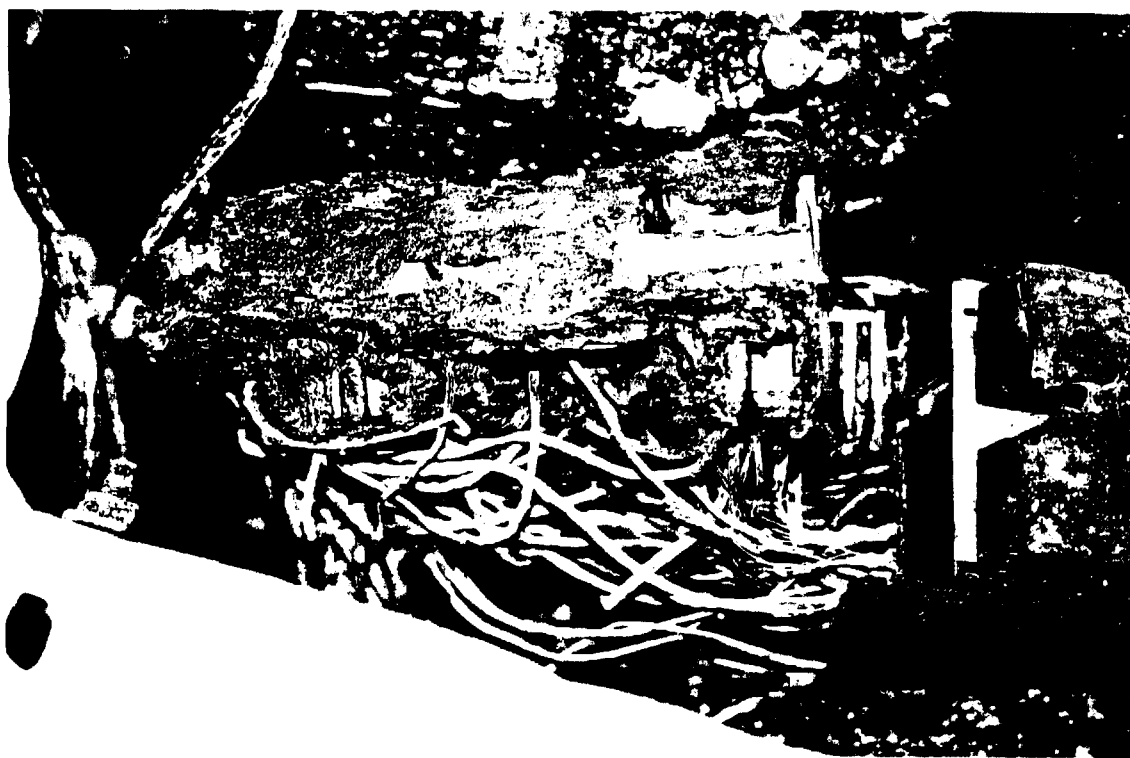
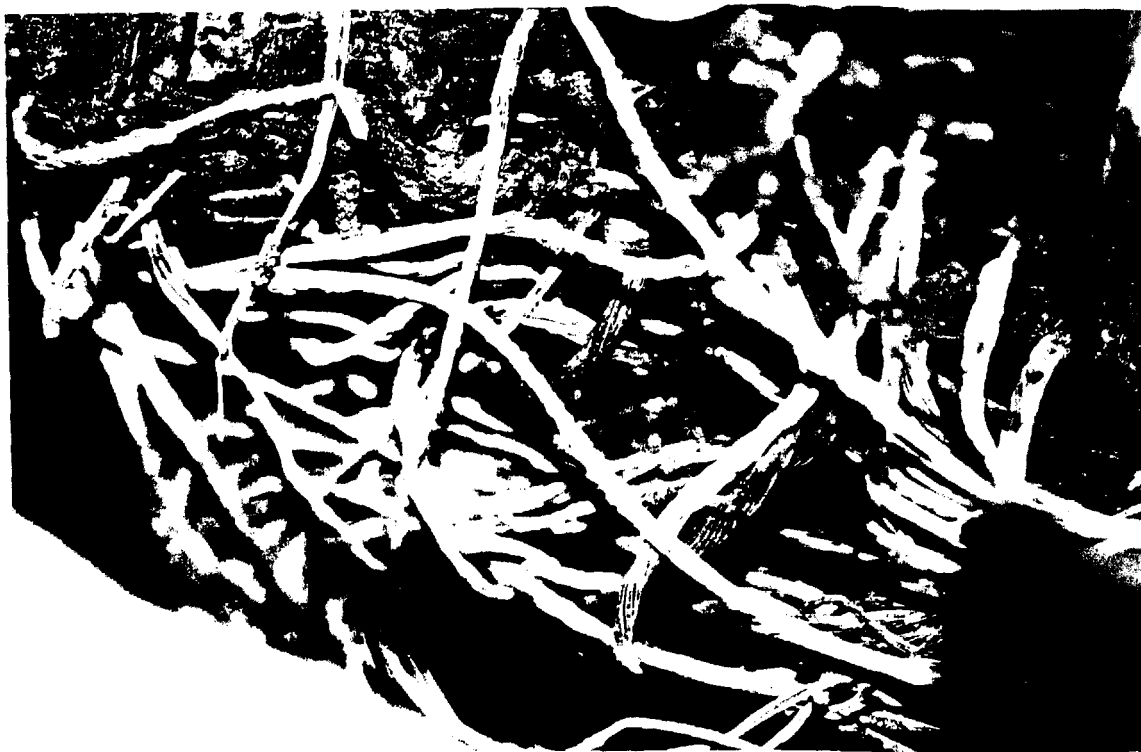


Figure No. 21 shows a closer view of some of the wiring found under the power distribution center near the area of fire origination. Please note that there are separated wires and beading was found on some of the wiring conductors.

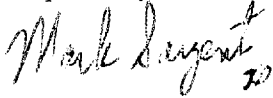
FIGURE #21



Following a thorough and complete evaluation of all remaining evidence in this case, and based on my knowledge, training and years of experience as a Forensic Mechanic and Vehicle Fire Investigator, it is my professional opinion that the initial examination of this vehicle shows significant evidence that an electrical failure has taken place that caused and/or contributed to the ignition of the combustible components in the left forward engine compartment. During the evaluation, I did not find evidence of any type of collision damage that may have caused the vehicle fire, nor did I find evidence that aftermarket component installation caused the vehicle fire. No destructive testing was performed at this time in anticipation of a third party evaluation, including Ford Motor Division and/or subsequent parties, that may provide further information into this matter. At this time it is my opinion that an electrical failure did take place that resulted in this fire.

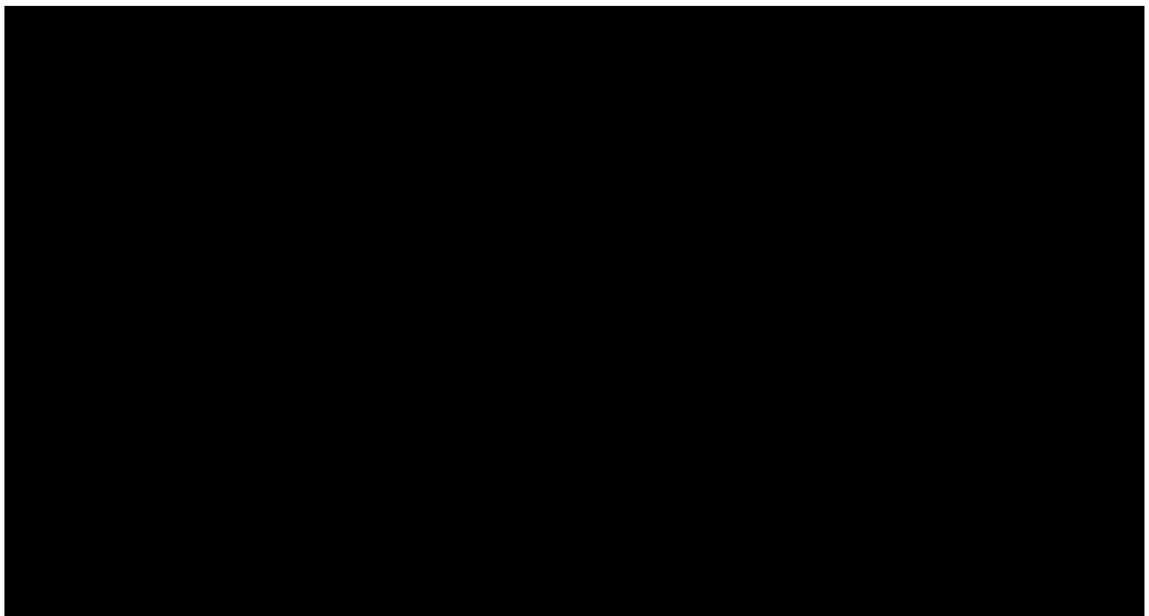
If I can be of any further assistance in this matter, please feel free to contact me at any time.

Respectfully Submitted,



Mark Sargent
Forensic Mechanic
Licensed Investigator
Ohio License No. 6868
ASE Recertified Master Technician

MS/sk

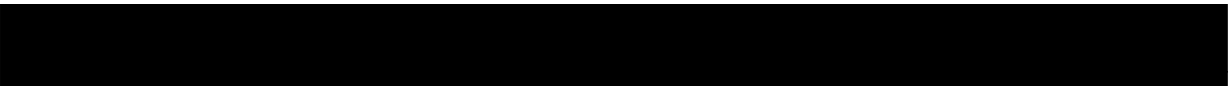


ISSUE LIST

Last Handling Date/ Issue Status	Name/ Reason Desc	Vin/ Case No.	Model Year and Vehicle Line	Issue Type
10/16/2003 CANCEL	[REDACTED] LEGAL - OTHER ATTORNEY DEMAND	1FMYU01121K [REDACTED] 1463212212	2001 ESCAPE	07
12/3/2002 CLOSED	[REDACTED] LEGAL - CUSTOMER WAITING FOR ACKNOWLEDGEMENT	1FMYU01121K [REDACTED] 1463212212	2001 ESCAPE	02
9/5/2002 CLOSED	[REDACTED] AWA - W/N CRITERIA, REQUEST AWA PRIOR REPAIR	1FMYU01121K [REDACTED] 1463212212	2001 ESCAPE	02
9/4/2002 CLOSED	[REDACTED] LEGAL - INSURANCE COMPANY SETTLEMENT	1FMYU01121K [REDACTED] 1463212212	2001 ESCAPE	02
8/29/2002 CLOSED	[REDACTED] LEGAL - ACCIDENT / FIRE	1FMYU01121K [REDACTED] 1463212212	2001 ESCAPE	07
8/27/2002 CLOSED	[REDACTED] REDIRECTED CALL - LEGAL SECTION	1FMYU01121K [REDACTED] 1463212212	2001 ESCAPE	02
8/19/2002 CLOSED	[REDACTED] AWA - WITHIN CRITERIA, REQUESTING AWA	1FMYU01121K [REDACTED] 1463212212	2001 ESCAPE	02
8/9/2002 CLOSED	[REDACTED] AWA - AWA DENIED	1FMYU01121K [REDACTED] 1463212212	2001 ESCAPE	02
8/9/2002 CLOSED	[REDACTED] MISC INQUIRY - CHANGE OF ADDRESS	1FMYU01121K [REDACTED] 1463212212	2001 ESCAPE	02

10/17/2003

Action List		
Date	Origin	Description
10/16/03	CALGFD	OPEN LEGAL CONTACT - ATTORNEY DEMAND
10/16/03	CALGFD	CANCEL ISSUE

10/17/2003

PE06-048-0050LC

Action Detail

VIN: 1FMYU01121K [REDACTED]	Year: 2001	Model: ESCAPE	Case: [REDACTED]
Name: [REDACTED]	Owner Status: Original	WSD: 2001-09-16	
Symptom Desc: AUTO TRANS GENERAL LEAKS		Primary Phone:	
Reason Desc: LEGAL - OTHER ATTORNEY DEMAND		Secondary Phone: [REDACTED]	
Issue Type: 07 LEGAL	Issue Status: CANCEL	Dealer: TOM CLARK FORD, INC.	
Origin Desc: CA-LITIGATION PREVENTION-FRONT DESK		P & A Code: 07996	
Action Desc: OPEN LEGAL CONTACT - ATTORNEY DEMAND			
Odometer: 41000 MI	Comm Type: MAIL		
Action Date: 10/16/2003	Action Time: 14:41:06:950	Action Data: Yes	
Analyst Name: LEICH,CHERIE	Analyst: CLEICH		

COMMENTS: *****ATTORNEY DEMAND***** DATE STAMPED 10-14-03. ATTORNEY ALLEGES CLIENT'S VEHICLE IS DEFECTIVE. ATTORNEY DEMANDS CONTACT FROM FORD REPRESENTATIVE.

[REDACTED] 17/2003

PE06-048-0051LC

Action Detail

VIN: 1FMYU011218	Year: 2001	Model: ESCAPE	Case:
Name:	Owner Status: Original	WSD: 2001-09-16	
Symptom Desc: AUTO TRANS GENERAL LEAKS		Primary Phone:	
Reason Desc: LEGAL - OTHER ATTORNEY DEMAND		Secondary Phone:	
Issue Type: 07 LEGAL	Issue Status: CANCEL	Dealer: TOM CLARK FORD, INC.	
Origin Desc: CA-LITIGATION PREVENTION-FRONT DESK		P & A Code: 07996	
Action Desc: CANCEL ISSUE			
Odometer: 41000 MI	Comm Type: OTHER	Action Data: No	
Action Date: 10/16/2003	Action Time: 15:22:16:173		
Analyst Name: LEICH,CHERIE	Analyst: CLEICH		

COMMENTS: CANCELLED ISSUES, OPENED UNDER INCORRECT CUSTOMER.

/17/2003

Action List

Date	Origin	Description
08/22/02	CACI38	CB-IT MAY TAKE 7 DAYS FOR CONSUMER AFFAIRS TO BEGIN INVESTIGATION
12/03/02	DEALER	UNABLE TO CONTACT CUSTOMER 3 TIMES

02-12-10/17/2003

PE06-048-0053LC

Action Detail

VIN: 1FMYU01121K [REDACTED]	Year: 2001	Model: ESCAPE	Case: [REDACTED]
Name: [REDACTED]	Owner Status: Original	WSD: 2001-09-16	
Symptom Desc:		Primary Phone:	
Reason Desc: LEGAL - CUSTOMER WAITING FOR ACKNOW		Secondary Phone: [REDACTED]	
Issue Type: 02 INFORMATION	Issue Status: CLOSED	Dealer: SUNRISE FORD OF NORTH HOLLYWOOD	
Origin Desc: US CONCERN CASE BASE		P & A Code: 05453	
Action Desc: CB-IT MAY TAKE 7 DAYS FOR CONSUMER AFFAIRS TO BEGIN INVESTIGATION			
Odometer: 15000 MI	Comm Type: PHONE		
Action Date: 08/22/2002	Action Time: 14:57:50:153	Action Data: No	
Analyst Name: VIOLET RICHARDSON	Analyst: VRICHARD		

COMMENTS: VLC078TCUSTOMER SAYS: - SOMEONE WAS SUPPOSED TO HAVE CALLED HIM BACK ABOUT THE ISSUE - WOULD LIKE TO KNOW WHAT IS HAPPENING AS HE IS STILL WITHOUT A VEH - IS PAYING FOR A RENTAL ALSO - WAWANESA INSURANCE CO. WAS ALSO CONTACTED BY HIMSELF - INSURANCE CO. TEL NO. 800-438-4300 OR 858-874-5300 - INSURANCE APPRAISER HAS ALSO VISITED THE VEH - CAN ALSO CALL HIS WIFE [REDACTED] PER CUSTOMER, DEALER SAYS: NONE CAC ADVISED: - IT MAY TAKE UP TO 7 DAYS FOR CONSUMER AFFAIRS TO BEGIN AN INVESTIGATION - CONSUMER AFFAIRS WILL CONTACT YOU BY MAIL OR PHONE - DOCUMENTED INFORMATION, ADDED TO PREVIOUS FILE INFERENCE CASE ID: 1572

[REDACTED] CustC10/17/2003

PE06-048-0054LC

Action Detail

VIN: 1FMYU01121K [REDACTED]	Year: 2001	Model: ESCAPE	Case: [REDACTED]
Name: [REDACTED]	Owner Status: Original	WSD: 2001-09-16	
Symptom Desc:		Primary Phone: [REDACTED]	
Reason Desc: LEGAL - CUSTOMER WAITING FOR ACKNOW		Secondary Phone: [REDACTED]	
Issue Type: 02 INFORMATION	Issue Status: CLOSED	Dealer: SUNRISE FORD OF NORTH HOLLYWOOD	
Origin Desc: DEALER		P & A Code: 05453	
Action Desc: UNABLE TO CONTACT CUSTOMER 3 TIMES			
Odometer: 15000 MI	Comm Type: OTHER		
Action Date: 12/03/2002	Action Time: 11:52:15:180	Action Data: No	
Analyst Name: MICHAEL ALLEN	Analyst: M-ALL33		

COMMENTS: IS THIS ISSUE CLOSED?

CustC10/17/2003

PE06-048-0055LC

Action List		
Date	Origin	Description
08/09/02	CACI38	PROVIDE INFORMATION ACCORDING TO PHRASEOLOGY
08/09/02	CACI38	PROVIDE INFORMATION ACCORDING TO PHRASEOLOGY
09/05/02	CACM12	AWARD REPAIR FINANCIAL ASSISTANCE

2002-09-10/17/2003

PE06-048-0056LC

Action Detail

VIN: 1FMYU01121K [REDACTED] Year: 2001 Model: ESCAPE Case: [REDACTED]
 Name: [REDACTED] Owner Status: Original WSD: 2001-09-16
 Symptom Desc: TIRES/WHEELS TIRE WEAR Primary Phone: [REDACTED]
 Reason Desc: AWA - W/N CRITERIA, REQUEST AWA PRI Secondary Phone: [REDACTED]
 Issue Type: 02 INFORMATION Issue Status: CLOSED Dealer: SUNRISE FORD OF NORTH HOLLYWOOD
 Origin Desc: US CONCERN CASE BASE P & A Code: 05453
 Action Desc: PROVIDE INFORMATION ACCORDING TO PHRASEOLOGY
 Odometer: 15000 MI Comm Type: PHONE
 Action Date: 08/09/2002 Action Time: 13:42:29:117 Action Data: No
 Analyst Name: JASON WYNTER Analyst: JWYNTER

COMMENTS: VLC078TCUSTOMER SAYS: -VEH FRONT TIRES ARE WORN AND WILL REQUIRE REPLACEMENT SOON. -DLR ADVISED CUST THAT CUST MUST PERIODICALLY CHECK ALIGNMENT AND OUT OF ALIGNMENT CAUSED PREMATURE WEAR TO TIRES. -CUST SEEKING COVERAGE AS CUST JUST PURCHASED VEH. -DLR ADVISED CUST REPAIR IS AT CUST EXPENSE CUST SEEKING ASSIST ON REPLACING TIRES PER CUSTOMER, DEALER SAYS: SUNRISE FORD OF NORTH HOLLYWOOD 5500 LANKERSHIM BLVD. NORTH HOLLYWOOD, CA 91601 TEL: (818) 980-9800. -CUST MUST PERIODICALLY CHECK ALIGNMENT. -DLR ADVISED CUST REPAIR IS AT CUST EXPENSE. CAC ADVISED: - ANY REQUEST FOR ASSISTANCE MUST BE REVIEWED BY A FORD/LINCOLN/MERCURY DEALERSHIP SO THAT THEY HAVE THE OPPORTUNITY TO INSPECT THE VEHICLE AND DETERMINE WHAT IS WRONG WITH THE VEHICLE AND IF THERE IS ANY POSSIBLE WARRANTY COVERAGE FOR THE ISSUE [REDACTED] AFTER THE DEALERSHIP'S DIAGNOSIS IS COMPLETE THE CRM/SM AT THE DEALERSHIP CAN REVIEW YOUR ISSUE AND MAKE A FINAL DECISION ABOUT ANY FINANCIAL ASSISTANCE FOR THIS REPAIR. =OBC TO DLR= =SPOKE TO REBECCA CRM WHO ADVISED CUST HAS NOT BEEN TO DLR BUT ONCE FOR WARRANTY WORK FOR CHECK ENGINE LIGHT -NO MAINTANACE RECORDS WITH DLR -ADVISED DLR WOULD NOT ASSIST -ADVISED CRM OF CUST IS PART OF CDP PROGRAM AND CRC WILLING TO ASSIST ON REPLACING TIRE FOR 50% -CRM OK WITH CSR ASSISTING -ADVISED CUST FORD AND DLR WILLING TO ASSIST WITH 50% -CUST ADVISED NOT HAPPY WITH OFFER AS HE DOES NOT HAVE MONEY TO PAY FOR TIRE REPLACEMENT AND THAT HE WILL JUST GO AND TRADE FOR ANOTHER VEH, PROBABLY A TOYOTA -APPOLGIZED TO CUST AND ADVISED INFO DOCUMENTED =OBC TO DLR= ADVISE CRM CUST REJECTED OFFER -ISSUE CLOSED NO ASISSTANCE- INERENCE CASE ID: 5410

[REDACTED] 17/2003

PE06-048-0057LC

Action Detail

VIN: 1FMYU01121K [REDACTED] Year: 2001 Model: ESCAPE Case: [REDACTED]
 Name: [REDACTED] Owner Status: Original WSD: 2001-09-16
 Symptom Desc: TIRES/WHEELS TIRE WEAR Primary Phone: [REDACTED]
 Reason Desc: AWA - W/N CRITERIA, REQUEST AWA PRI Secondary Phone: [REDACTED]
 Issue Type: 02 INFORMATION Issue Status: CLOSED Dealer: SUNRISE FORD OF NORTH HOLLYWOOD
 Origin Desc: US CONCERN CASE BASE P & A Code: 05453
 Action Desc: PROVIDE INFORMATION ACCORDING TO PHRASEOLOGY
 Odometer: 15000 MI Comm Type: PHONE
 Action Date: 08/09/2002 Action Time: 14:33:40:917 Action Data: No
 Analyst Name: NANCY DI RICO Analyst: NDIRICO

COMMENTS: VLC078TCUSTOMER SAYS: -SPOKE WITH JASON, LAVERNE -TIRE ISSUE-FRONT TIRES ARE WORN -WAS PROVIDED WITH FINANCIAL ASSISTANCE 50% -DID NOT DENY THE OFFER, I ONLY SAID THAT I COULD NOT AFFORD THE REPAIR -WILL ACCEPT THE OFFER FOR 50% AS I REALLY NEED THE HELP --SEEKING FINANCIAL ASSISTANCE PER CUSTOMER, DEALER SAYS: -SUNRISE FORD HAS THE VEH CAC ADVISED: - ANY REQUEST FOR ASSISTANCE MUST BE REVIEWED BY A FORD/LINCOLN/MERCURY DEALERSHIP SO THAT THEY HAVE THE OPPORTUNITY TO INSPECT THE VEHICLE AND DETERMINE WHAT IS WRONG WITH THE VEHICLE AND IF THERE IS ANY POSSIBLE WARRANTY COVERAGE FOR THE ISSUE. AFTER THE DEALERSHIP'S DIAGNOSIS IS COMPLETE THE CRM/SM AT THE DEALERSHIP CAN REVIEW YOUR ISSUE AND MAKE A FINAL DECISION ABOUT ANY FINANCIAL ASSISTANCE FOR THIS REPAIR. --ADV CX THAT DUE TO THE CIRCUMSTANCES, THAT WE WILL PROVIDE THE 50% ASSISTANCE -CX DID APOLOGIZE FOR HIS BEHAVIOUR --ADV CX THAT TIRES ARE NOT WARRANTED BY BUMPER TO BUMPER OR ESP--BECAUSE OF THE SITUATION, WE ARE WILLING TO ASSIST YOU WITH 50% FOR THE REPAIR -CX ACCEPTED OFFER AND WILL BE TAKING THE VEH ON TUES TO SUNRISE FORD FOR THE TIRE CONCERN INFERENCE CASE ID: 5410

[REDACTED] 17/2003

Action Detail

VIN: 1FMYU01121K	Year: 2001	Model: ESCAPE	Case:
Name:	Owner Status: Original	WSD: 2001-09-16	
Symptom Desc: TIRES/WHEELS TIRE WEAR		Primary Phone:	
Reason Desc: AWA - W/N CRITERIA, REQUEST AWA PRI		Secondary Phone:	
Issue Type: 02 INFORMATION	Issue Status: CLOSED	Dealer: SUNRISE FORD OF NORTH HOLLYWOOD	
Origin Desc: MANUAL - EMAIL		P & A Code: 05453	
Action Desc: AWARD REPAIR FINANCIAL ASSISTANCE			
Odometer: 15000 MI	Comm Type: PHONE		
Action Date: 09/05/2002	Action Time: 14:22:17:603	Action Data: Yes	
Analyst Name: MULZAC,WAYNE	Analyst: WMULZAC		

COMMENTS: VLC078TCUSTOMER SAYS: - NONE PER CUSTOMER, DEALER SAYS: - NONE CAC ADVISED: - E-MAIL RECIEVED FROM ED - QCCLR APPLICATION PROBLEM AT THE DLR - OBC TO DLR AND SPOKE W/MICHAEL ALLEN S/M TO PROVIDE CODE

17/2003

Action Detail

VIN: 1FMYU01121K [REDACTED] Year: 2001 Model: ESCAPE Case: [REDACTED]
 Name: [REDACTED] Owner Status: Original WSD: 2001-09-16
 Symptom Desc: Primary Phone: [REDACTED]
 Reason Desc: LEGAL - INSURANCE COMPANY SETTLEMEN Secondary Phone: [REDACTED]
 Issue Type: 02 INFORMATION Issue Status: CLOSED Dealer: SUNRISE FORD OF NORTH HOLLYWOOD
 Origin Desc: US CONCERN CASE BASE P & A Code: 05453
 Action Desc: ADVISE CUSTOMER TO CONTACT THEIR INSURANCE COMPANY FOR ASSISTANCE
 Odometer: 15000 MI Comm Type: PHONE
 Action Date: 08/30/2002 Action Time: 10:48:42:743 Action Data: No
 Analyst Name: LLOYS DILLON Analyst: LDILLON

Caller Information If Different From Vehicle Owner:

First Name	Middle Initial	Last Name	Day Phone	Relationship
ROSE RO		TAZI	8184878137	SPOUSE

COMMENTS: VLC078TCUSTOMER SAYS: *****TRNASFER FROM INQUIRY*** VEH WAS INVOLVE IN A FIRE SEEKING INFO REGARDING ISSUE..INSURANCE WIL BE GETTING \$20483 AND VEH IS OWES \$18000 ON VEH..SEEKING A NEW VEH INSTEAD OF PAY OFF..CX RENT A VEH FROM JULY 18TH UNTIL NOW..CX WILL NOT COME OUT WITH ANYTHING ON VEH PER CUSTOMER, DEALER SAYS: CAC ADVISED: - PLEASE DISCUSS THIS ISSUE WITH YOUR INSURANCE COMPANY. FORD IS UNABLE TO ASSIST IN THIS SITUATION. INFERENCE CASE ID: 5353

... [REDACTED] CustC10/17/2003

Action Detail

VIN: 1FMYU01121K [REDACTED] Year: 2001 Model: ESCAPE Case: [REDACTED]
 Name: [REDACTED] Owner Status: Original WSD: 2001-09-16
 Symptom Desc: Primary Phone: [REDACTED]
 Reason Desc: LEGAL - INSURANCE COMPANY SETTLEMEN Secondary Phone: [REDACTED]
 Issue Type: 02 INFORMATION Issue Status: CLOSED Dealer: SUNRISE FORD OF NORTH HOLLYWOOD
 Origin Desc: US CONCERN CASE BASE P & A Code: 05453
 Action Desc: ADVISE CUSTOMER TO CONTACT THEIR INSURANCE COMPANY FOR ASSISTANCE
 Odometer: 15000 MI Comm Type: PHONE
 Action Date: 09/04/2002 Action Time: 13:48:38:683 Action Data: No
 Analyst Name: NANCY DI RICO Analyst: NDIRICO

Caller Information If Different From Vehicle Owner:

First Name	Middle Initial	Last Name	Day Phone	Relationship
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	SPOUSE

COMMENTS: VLC078TCUSTOMER SAYS: -CALLING BACK ON SAME ISSUE -VEH BLEW UP IN AN ELECTRICAL CONCERN--
 ACCIDENT -VEH MELTED DOWN IN LESS THAN 3 MINUTES -SUNRISE FORD IS WHERE WE BOUGHT THE VEH -INSURANCE CO.
 ADV CX THAT THEY WERE GOING TO PAY OFF THE VEH--WE DID NOT ACCEPT THE OFFER YET -WE WANT FORD TO GIVE US
 ANOTHER VEH -THE BALANCE THAT WE WILL BE GETTING BACK IS \$2700 AS THE INSURANCE CO IS PAYING OFF THE VEH TO
 FORD -INSURANCE CO WILL BE PAYING OFF THE FINANCE CO AND GIVE THE CX THE REMAINING BALANCE OF \$2700 -OUR
 PAYMENTS TO FORD AUTO \$468.00 A MONTH -IF I HAVE A WARRANTY ON THE VEH WHY DOES FORD NOT GET INVOLVED -WE
 OWE THE FORD FINANCE CO TO WHICH THE INSURANCE CO WILL BE PAYING OFF AND OUR BALANCE IS \$2700 -SEEKING
 FURTHER ASSISTANCE PER CUSTOMER, DEALER SAYS: NONE CAC ADVISED: - PLEASE DISCUSS THIS ISSUE WITH YOUR
 INSURANCE COMPANY. FORD IS UNABLE TO ASSIST IN THIS SITUATION. INFERENCE CASE ID: 5353

[REDACTED] &CustC10/17/2003

Action Detail

VIN: 1FMYU01121K [REDACTED]	Year: 2001	Model: ESCAPE	Case: [REDACTED]
Name: [REDACTED]	Owner Status: Original	WSD: 2001-09-16	
Symptom Desc: FIRE/SMOKE VISIBLE FLAME UNDERHOOD		Primary Phone: [REDACTED]	
Reason Desc: LEGAL - ACCIDENT / FIRE		Secondary Phone: [REDACTED]	
Issue Type: 07 LEGAL	Issue Status: CLOSED	Dealer: SUNRISE FORD OF NORTH HOLLYWOOD	
Origin Desc: US CONCERN CASE BASE		P & A Code: 05453	
Action Desc: ADVISE CUST INFORMATION WILL BE SENT TO CONSUMER AFFAIRS			
Odometer: 18000 MI	Comm Type: PHONE		
Action Date: 08/19/2002	Action Time: 13:28:02:217	Action Data: Yes	
Analyst Name: ELIZABETH BOODHAI	Analyst: EBOOD		

COMMENTS: VLC078TCUSTOMER SAYS: - VEH WAS INVOLVED IN A FIRE - THE INCIDENT OCCURED ON AUG 17 APPROX 9:30 AM - CUST HAD PARKED THE VEH BEHIND HIS BUILDING AND WENT INSIDE TO DROP SOMETHING AT HOME AND WHEN HE CAME BACK THE VEH WAS ON FIRE - APPROX TIME OF LEAVING THE VEH AND COMING BACK IS 5 MINUTES MAX - CUST ARRIVED ON THE SCENE AND HE SAW FLAMES COMING OUT OF THE ENGINE COMPARTMENT - A TRIPLE A TOW TRUCK DRIVER SAW THE FIRE AND USED HIS EXTINGUISHER BUT IT RAN OUT AND THE FIRE WAS STILL THERE - THE CUST AND THE TRIPLE A TOW TRUCK DRIVER THEN STARTED PUTTING WATER ON THE FIRE BUT IT WAS GETTING WORSE (CUST DID THIS BECAUSE HE WAS SCARED THAT IT WOULD DAMAGE THE VEH BESIDE HIS AND THE BUILDING) - THE FIRE DEPT EVENTUALLY SHOWED UP ON THE SCENE AND PUT OUT THE FIRE - A FIRE REPORT WAS FILED AND THEY BELIEVE THAT THE CAUSE WAS ELECTRICAL - NO POLICE OR AMBULANCE WAS CALLED TO THE SCENE - NO INJURIES TO - THE VEH IS CURRENTLY IN THE SAME LOCATION IT WASN'T MOVED - THE FIRE CAUSED DAMAGE THE ENGINE, RADITOR, HOOD, LIGHTS, FENDERS EVERYTHING IN THE AREA IN THE FRONT - CUST HAS CONTACTED AN INSURANCE CO. - CUST BELIEVES THAT THIS IS A DEFECT IN THE PRODUCT THAT CAUSED THE CONCERN PER CUSTOMER, DEALER SAYS: - MICHAEL ALLEN S/M HAD AN ATTITUDE PROBLEM WITH CUST WIFE 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. INFERENCE CASE ID: 5349

[REDACTED] 0/17/2003

Action Detail

VIN: 1FMYU01121K	Year: 2001	Model: ESCAPE	Case
Name:	Owner Status: Original	WSD: 2001-09-16	
Symptom Desc: FIRE/SMOKE VISIBLE FLAME UNDERHOOD		Primary Phone:	
Reason Desc: LEGAL - ACCIDENT / FIRE		Secondary Phone:	
Issue Type: 07 LEGAL	Issue Status: CLOSED	Dealer: SUNRISE FORD OF NORTH HOLLYWOOD	
Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION		P & A Code: 05453	
Action Desc: MAKE OUTBOUND CALL TO CUSTOMER			
Odometer: 18000 MI	Comm Type: PHONE		
Action Date: 08/20/2002	Action Time: 18:03:44:197	Action Data: Yes	
Analyst Name: LEAH GALE	Analyst: 9245LG		

COMMENTS: MESSAGE LEFT ON HOME PHONE NUMBER/MESSAGE CENTER ASKING THAT CUSTOMER CONTACT ME BACK AT 313 845-5547 BETWEEN 9:30-6 EST

17/2003

PE06-048-0063LC

Action Detail

VIN: 1FMYU01121K [REDACTED]	Year: 2001	Model: ESCAPE	Case [REDACTED]
Name: [REDACTED]	Owner Status: Original	WSD: 2001-09-16	
Symptom Desc: FIRE/SMOKE VISIBLE FLAME UNDERHOOD		Primary Phone:	
Reason Desc: LEGAL - ACCIDENT / FIRE		Secondary Phone: [REDACTED]	
Issue Type: 07 LEGAL	Issue Status: CLOSED	Dealer: SUNRISE FORD OF NORTH HOLLYWOOD	
Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION		P & A Code: 05453	
Action Desc: FINAL CASE DISPOSITION			
Odometer: 18000 MI	Comm Type: PHONE		
Action Date: 08/29/2002	Action Time: 14:25:25:740	Action Data: No	
Analyst Name: LEAH GALE	Analyst: 9245LG		

COMMENTS: LPA SPOKE WITH BARAK ISAACS WHO ADVISED HE WAS CALLING FOR CUSTOMER. VERIFIED NO INJURIES IN FIRE. INSURANCE COMPANY HAS BEEN CONTACTED AND HAVE TOTALLED THE VEHICLE. LPA ADVISED THAT MATTER SHOULD CONTINUE THROUGH THE INSURANCE COMPANY AND EXPLAINED SUBROGATION PROCESS.

[REDACTED]/17/2003

Action Detail

VIN: 1FMYU01121K [REDACTED] Year: 2001 Model: ESCAPE Case: [REDACTED]
Name: [REDACTED] Owner Status: Original WSD: 2001-09-16
Symptom Desc: Primary Phone: [REDACTED]
Reason Desc: REDIRECTED CALL - LEGAL SECTION Secondary Phone: [REDACTED]
Issue Type: 02 INFORMATION Issue Status: CLOSED Dealer: SUNRISE FORD OF NORTH HOLLYWOOD
Origin Desc: US CONCERN CASE BASE P & A Code: 05453
Action Desc: CONSUMER AFFAIRS; ADDRESS AVAILABLE IN PHRASEOLOGY
Odometer: 15000 MI Comm Type: PHONE
Action Date: 08/27/2002 Action Time: 14:19:46:620 Action Data: No
Analyst Name: NATASHA SEATON Analyst: NSEATON

Caller Information If Different From Vehicle Owner:

First Name	Middle Initial	Last Name	Day Phone	Relationship
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	ATTORNEY

COMMENTS: VLC078TCUSTOMER SAYS: -ATTORNEY CALLING ON BEHALF OF CUST -BOUGHT VEH YEARS AGO MANY PROBLEMS -VEH HAD ELECTRIC PROBLEM AND CAUGHT ON FIRE -CUST IS LOOKING FOR ASSIST AND IS GETTING RUNAROUND -CUST IS SEEKING TO GET RID OF VEH AND GET MONEY BACK ; ALSO HAD TO RENT VEH PER CUSTOMER, DEALER SAYS: -NONE CAC ADVISED: - PLEASE SEND A DEMAND LETTER TO FORD MOTOR COMPANY, CONSUMER AFFAIRS P.O. BOX 6248, MD-3NE-B DEARBORN, MICHIGAN 48126 ---->ADVISED AS PER HISTORICALS (MESSAGE LEFT ON HOME PHONE NUMBER/MESSAGE CENTER ASKING THAT CUSTOMER CONTACT ME BACK AT [REDACTED] INFERENCE CASE ID: 5339

CustC10/17/2003

Action Detail

VIN: 1FMYU01121K [REDACTED] Year: 2001 Model: ESCAPE Case: [REDACTED]
Name: [REDACTED] Owner Status: Original WSD: 2001-09-16
Symptom Desc: TIRES/WHEELS TIRE WEAR Primary Phone:
Reason Desc: AWA - WITHIN CRITERIA, REQUESTING Secondary Phone: [REDACTED]
Issue Type: 02 INFORMATION Issue Status: CLOSED Dealer: SUNRISE FORD OF NORTH HOLLYWOOD
Origin Desc: US CONCERN CASE BASE P & A Code: 05453
Action Desc: PROVIDE ASSISTANCE
Odometer: 15000 MI Comm Type: PHONE
Action Date: 08/13/2002 Action Time: 12:47:02:083 Action Data: Yes
Analyst Name: VIOLET RICHARDSON Analyst: VRICHARD

COMMENTS: VLC078TCUSTOMER SAYS: - CUST IS CALLING BACK BECAUSE YOU WISH TO TAKE UP THE OFFER WHICH WAS PROVIDED TO HIM FOR 50% - WENT TO THE DLRSHIP WHO ADVISE THAT HE WOULD HAVE TO PAY FULL COST FOR THE TIRES PER CUSTOMER, DEALER SAYS: NONE CAC ADVISED: - I HAVE REVIEWED THIS SITUATION WITH YOUR DEALERSHIP AND WE HAVE AGREED DUE TO YOUR LOYALTY TO FORD AND THE DEALERSHIP THEY WOULD LIKE TO PROVIDE YOU WITH ASSISTANCE TOWARDS YOUR VEHICLE REPAIR. - WE WILL FOLLOW UP WITH THE DEALERSHIP ONCE THE REPAIRS HAVE BEEN COMPLETED ON YOUR VEHICLE, TO PROVIDE THE NECESSARY INFORMATION FOR THE COVERAGE. - I WILL ALSO FOLLOW UP WITH YOU TO ENSURE THAT THE REPAIRS HAVE BEEN COMPLETED. - (NOTE TO CSR: PROVIDE THE AMOUNT OF ASSISTANCE, IF AVAILABLE TO THE CUSTOMER. PLEASE SCHEDULE A FOLLOW UP WITH THE CUSTOMER AND THE DEALERSHIP) ===== OBC TO DLR ===== SPOKE WITH MIKE ALLEN (SM) TO ADVISE THAT THE 50% CONTRIBUTION TOWARDS THE TIRE REPLACEMENT WAS REINSTATED AND SHOULD SUBMIT THROUGH P98 FOR COMMITMENT CODE INFERENCE CASE ID: 5414

[REDACTED] /17/2003

Action Detail

VIN: 1FMYU01121K [REDACTED]	Year: 2001	Model: ESCAPE	Case: [REDACTED]
Name: [REDACTED]	Owner Status: Original	WSD: 2001-09-16	
Symptom Desc: TIRES/WHEELS TIRE WEAR		Primary Phone:	
Reason Desc: AWA - WITHIN CRITERIA, REQUESTING		Secondary Phone: [REDACTED]	
Issue Type: 02 INFORMATION	Issue Status: CLOSED	Dealer: SUNRISE FORD OF NORTH HOLLYWOOD	
Origin Desc: DEALER		P & A Code: 05453	
Action Desc: DOCUMENT ADDITIONAL INFORMATION			
Odometer: 15000 MI	Comm Type: VISIT		
Action Date: 08/19/2002	Action Time: 15:44:25:110	Action Data: No	
Analyst Name: MICHAEL ALLEN	Analyst: M-ALL33		

COMMENTS: TIRES HAVE BEEN REPLACED AS OF AUG 13TH. AWAITING COMMITMENT CODE FROM CAC.

[REDACTED]/17/2003

PE06-048-0067LC

Action Detail

VIN: 1FMYU01121K [REDACTED] Year: 2001 Model: ESCAPE Case: [REDACTED]
Name: [REDACTED] Owner Status: Original WSD: 2001-09-16
Symptom Desc: TIRES/WHEELS TIRE WEAR Primary Phone: [REDACTED]
Reason Desc: AWA - AWA DENIED Secondary Phone: [REDACTED]
Issue Type: 02 INFORMATION Issue Status: CLOSED Dealer: SUNRISE FORD OF NORTH HOLLYWOOD
Origin Desc: US CONCERN CASE BASE P & A Code: 05453
Action Desc: ADVISE CUST VEHICLE IS BEYOND WARRANTY; NO ASSISTANCE
Odometer: 15000 MI Comm Type: PHONE
Action Date: 08/09/2002 Action Time: 14:17:30:720 Action Data: No
Analyst Name: LAVERNE Analyst: LMCGARRE

COMMENTS: VLC078TCUSTOMER SAYS: -CUST REQUESTED TO SPEAK TO THE PREVIOUS CSR -CUST IS NOT HAPPY WITH OFFER OF 50% OF ASSISTANCE BUT WOULD LIKE TO CHANGE HIS MIND -CUST USED PROFANITY AND HUNG UP THE PHONE PER CUSTOMER, DEALER SAYS: NONE CAC ADVISED: - I HAVE REVIEWED YOUR SITUATION AND UNFORTUNATELY, THERE ARE NO WARRANTIES, FSA/CSP ON YOUR VEHICLE THAT WOULD PROVIDE ASSISTANCE FOR THIS REPAIR
***** DUE TO THE CUSTS STATEMENT REGARDING GETTING A TOYOTA
A DECLINING THE OFFER WHEN GIVEN, CRC WILL NOT PROVIDE FINANCIAL ASSISTANCE INFERENCE CASE ID: 5411

[REDACTED] 17/2003

Action Detail

VIN: 1FMYU01121K [REDACTED] Year: 2001 Model: ESCAPE Cas [REDACTED]
Name: [REDACTED] Owner Status: Original WSD: 2001-09-16
Symptom Desc: Primary Phone: [REDACTED]
Reason Desc: MISC INQUIRY - CHANGE OF ADDRESS Secondary Phone: [REDACTED]
Issue Type: 02 INFORMATION Issue Status: CLOSED Dealer: SUNRISE FORD OF NORTH HOLLYWOOD
Origin Desc: MANUAL - PHONE CSR P & A Code: 05453
Action Desc: UPDATE CUSTOMER ADDRESS OR PHONE NUMBER
Odometer: 15000 MI Comm Type: PHONE
Action Date: 08/09/2002 Action Time: 12:51:47:320 Action Data: No
Analyst Name: MATTHEW GRECH Analyst: MGRECH

COMMENTS: VLC078TCUSTOMER SAYS: -VEH FRONT TIRES ARE WORN AND WILL REQUIRE REPLACEMENT SOON. -DLR ADVISED CUST THAT CUST MUST PERIODICALLY CHECK ALIGNMENT AND OUT OF ALIGNMENT CAUSED PREMATURE WEAR TO TIRES. -CUST SEEKING COVERAGE AS CUST JUST PURCHASED VEH. -DLR ADVISED CUST REPAIR IS AT CUST EXPENSE. PER CUSTOMER, DEALER SAYS: SUNRISE FORD OF NORTH HOLLYWOOD 5500 LANKERSHIM BLVD. NORTH HOLLYWOOD, CA 91601 TEL: (818) 980-9800. -CUST MUST PERIODICALLY CHECK ALIGNMENT. -DLR ADVISED CUST REPAIR IS AT CUST EXPENSE. CAC ADVISED: *TRANSFERRED TO CUST DIFF.

C10/17/2003

PE06-048-0069LC

- NOTICE TO DEFENDANT - YOU ARE BEING SUED BY PLAINTIFF

To protect your rights, you must appear in this court on the trial date shown below. You may lose the case if you do not appear. The court may award the plaintiff the amount of the claim and the costs. Your wages, money, and property may be taken without further warning from the court.

- AVISO AL DEMANDADO - A USTED LO ESTAN DEMANDANDO

Para proteger sus derechos, usted debe presentarse ante esta corte en la fecha del juicio indicada abajo. Si no se presenta, puede perder el caso. La corte puede decidir en favor del demandante por la cantidad del reclamo y los costos. A usted le pueden quitar su salario, su dinero, y otras cosas de su propiedad, sin aviso adicional por parte de esta corte.

PLAINTIFF/DEMANDANTE

[REDACTED]
[REDACTED]
NO HOLLYWOOD, CA [REDACTED]
[REDACTED]

DEFENDANT/DEMANDADO

NGP MOTORS, INC
DBA SUNRISE FORD

5500 LANKERSHIM BLVD.
NO HOLLYWOOD, CA 91601
(818) 980-9800

FORD MOTOR CORPORATION
AGENT FOR SERVICE:CT CORPORATION SYSTEM

818 WEST SEVENTH STREET
LOS ANGELES, CA 90017
() -

Fict. Bus. Name Stmt. No. Expires:

PLAINTIFF'S CLAIM

1. ☒ a. Defendant owes me the sum of \$ 5000.00 , not including court costs, because (describe claim and date):
PICKED CAR UP AFTER FORD WORKED ON IT WITHIN 1 HOUR CAR BLEW UP Date: 08 /17 /2002
BURNT TO GROUND TOTALLY.
2. ☐ b. I have had an arbitration of an attorney-client fee dispute. (Attach Attorney-Client fee Dispute form (see form SC-101)).
3. ☐ This claim is against a government agency, and I filed a claim with the agency. My claim was denied by the agency, or the agency did not act on my claim before the legal deadline. (See form SC-150.)
4. ☒ a. I have asked defendant to pay this money, but it has not been paid.
☐ b. I have NOT asked defendant to pay this money because (explain):
4. This court is the proper court for the trial because ☒ A *(In the box at the left, insert one of the letters from the list called "Venue Table" on the back of this sheet. If you select D, E, or F, specify additional facts in this space):*
5. I have ☐ have not ☒ filed more than one other small claims action anywhere in California during this calendar year in which the amount demanded is more than \$2,500.
6. I have ☐ have not ☒ filed more than 12 claims in this court, including this claim, during the previous 12 months.
7. I understand that
 - a. I may talk to an attorney about this claim, but I cannot be represented by an attorney at the trial in the small claims court.
 - b. I must appear at the time and place of trial and bring all witnesses, books, receipts, and other papers or things to prove my case.
 - c. I have no right of appeal on my claim, but I may appeal a claim filed by the defendant in this case.
 - d. If I cannot afford to pay the fees for filing or service by a sheriff, marshal, or constable, I may ask that the fees be waived.
8. I have received and read the sheet explaining some important rights of plaintiffs in the small claims court.
9. No defendant is in the military service ☐ except (name):
I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct.

DATE
07/23/2003

TYPE OR PRINT PLAINTIFF'S NAME
YOUSSEF TAZI

SIGNATURE OF PLAINTIFF
= > >

ORDER TO DEFENDANT

You must appear in this court on the trial date and time SHOWN BELOW if you do not agree with the plaintiff's claim. Bring all witnesses, books, receipts, and other papers or things with you to support your case.

HEARING DATE	DATE	DAY	TIME	DIVISION	LOCATION
FECHA DEL JUICIO	10/28/2003	TUE	01:30 PM	NWP	6230 SYLMAR AVE.

Filed on (date): 07/23/2003

JOHN A. CLARKE, Executive Officer/Clerk
By SAKITA COWANS, Deputy

THE COUNTY PROVIDES SMALL CLAIMS ADVISOR SERVICES FREE OF CHARGE. READ THE INFORMATION ON THE REVERSE.

SC-100 (Rev. 1-98) PLAINTIFF'S CLAIM AND ORDER TO DEFENDANT (Small Claims)
EITHER PARTY MAY REQUEST A POSTPONEMENT IN WRITING 7 CALENDAR DAYS PRIOR TO TRIAL, FEE \$10.00

PARTY ☒ PLAINTIFF ☐ DEFENDANT (Name and Address): NAME AND ADDRESS OF COURT: NORTHWEST DISTRICT Van Nuys Court House West 14400 ELLIOTT MALL Van Nuys Ca 91401	TELEPHONE NO.: FOR COURT USE ONLY
PLAINTIFF(S): DEFENDANT(S): CT Corporation System	
PROOF OF SERVICE (Small Claims)	HEARING DATE: 10/28/03 DAY: Tues TIME: 1:30 pm DEPT./DIVISION: NWP

1. At the time of service I was at least 18 years of age and not a party to this action, and I served copies of the following:

- ☐ Plaintiff's Claim ☐ Order of Examination
☐ Defendant's Claim ☐ Subpoena Duces Tecum

☒ Other (specify):

Registered certified mail

2. a. Party served (specify name of party as shown on the documents served):

CT Corporation System

b. Person served: ☐ party in item 2.a. ☐ other (specify name and title or relationship to the party named in item 2.a.)

3. By delivery ☐ at home ☒ at business

a. date: 10/02/03

b. time: 11:45 AM

c. address: street, Los Angeles, CA,

4. Manner of service (check proper box):

- a. ☐ Personal service. I personally delivered to and left copies with the party served. (C.C.P. 415.10)
- b. ☐ Substituted service on corporation, unincorporated association (including partnership), or public entity. By leaving, during usual office hours, copies in the office of the person served with the person who apparently was in charge and thereafter mailing (by first-class mail, postage prepaid) copies to the person to be served at the place where the copies were left. (C.C.P. 415.20(a))
- c. ☐ Substituted service on natural person, minor, incompetent, or candidate. By leaving copies at the dwelling house, usual place of abode, usual place of business, or usual mailing address other than a U. S. Postal Service post office box of the person served in the presence of a competent member of the household or a person apparently in charge of the office or place of business, at least 18 years of age, who was informed of the general nature of the papers, and thereafter mailing (by first-class mail, postage prepaid) copies to the person to be served at the place where the copies were left. (C.C.P. 415.20(b))
- d. ☒ Date of mailing: 10/2/03

From (city): *North Hollywood Ca*

Information regarding date and place of mailing is required for services effected in manner 4.b. and 4.c. above.
 Certified mail service may be performed only by the Clerk of the Court in small claims matters.

5. Person serving (name, address, and telephone number):

- a. Fee for service: \$
- b. ☐ Not a registered California process server
- c. ☐ Exempt from registration under B&P Section 22350(b)
- d. ☐ Registered California process server
1. ☐ Employee or independent contractor
2. Registration Number:
3. County:

6. ☐ I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

7. ☐ I am a California sheriff, marshal, or constable and I certify that the foregoing is true and correct.

Date:

(SIGNATURE OF SERVER)

LAFD FIRS

FIELD OPERATION (902S)

ACTION: ...

INC NO: 0345 DATE: 081702 1ST ONS: EN060
ADDRESS: 06201 N BECK AV
COMPANY: EN060

DATES: ALARM 081702 SCENE 081702 TRANS HOSP CMPLT 081702
TIMES: 0940 0945 1000

NUMBER OF PERSONNEL: 4 FIREFIGHTER INJURIES: 0 FATALITIES: 0

COMMENTS: UNKNOWN CAUSE, 2001 VEHICLE WITH LOW MILEAGE, NO SIGN OF SUSPICIO
US ACT HOOD CLOSED UPON FD ARRIVAL
.....

F902M STATUS CODE: ..

MEMBER ID #: RW2706 NAME: RONALD A WEBER



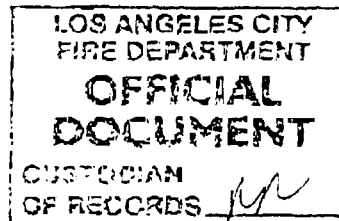
ENTER=SEND REPORT; CTRL(LEFT ONLY)=RESET; F2=CANCEL REPORT;
F7=PAGE BACKWARD; F8=PAGE FORWARD; F12=SIGN OFF

DATE 10/17/03

CITY OF LOS ANGELES

FIRE DEPARTMENT

FIELD INCIDENT REPORT



INCIDENT NUMBER: 0345
EXPOSURE NUMBER: 000
INCIDENT DATE: 08/17/02

TIME OF ALARM: 0940
INCIDENT LOCATION: 6202 N BECK AV

FLOOR OF ORIGIN:
OWNERS NAME:
CORPORATION:
OCCUPANTS NAME:
DOING BUSINESS AS:



TYPE OF INCIDENT: FIRE MOBILE PROP OUTSIDE STRUCTURE
PROPERTY USE: ROAD OR PARKING AREA
ORIGIN OF FIRE: ENGINE, GEAR, WHEEL AREA
FORM OF HEAT: FORM OF IGNITION UNKNOWN
IGNITION FACTOR: PART FAILURE LEAK OR BREAK
MATERIAL 1ST IGNITED
TYPE: FLEXIBLE PLASTICS
FORM: FORM OF MATERIAL, UNKNOWN

MOBIL EQUIPMENT: AUTOMOBILE
MAKE FORD LIC/VIN 4UIM066
EST PROPERTY LOSS: 5,000
EST CONTENT LOSS:

INFORMATION CONTAINED IN THIS REPORT IS INTENDED FOR THE SOLE USE OF THE LOS ANGELES FIRE DEPARTMENT. ESTIMATIONS AND EVALUATIONS MADE HEREIN REPRESENT 'MOST LIKELY' AND 'MOST PROBABLE' CAUSE AND EFFECT. ANY REPRESENTATION AS TO VALIDITY OR ACCURACY OF DATA CONTAINED IN THIS REPORT, EXCEPT WHERE IT PERTAINS TO THE STATISTICAL DATA BASE OF THE CITY OF LOS ANGELES, IS NEITHER INTENDED OR IMPLIED.

10/21/03 TUE 10:06 [TX/RX NO 7484]

OCT 22 2003 14:38

PAGE.03

PE06-048-0073LC

LAFD FIRE

FIELD OPERATION (902S)

ACTION: ...

INC NO: 0345 DATE: 081702 1ST CNS: EN060
ADDRESS: 06201 N BECK AV
COMPANY: EN060

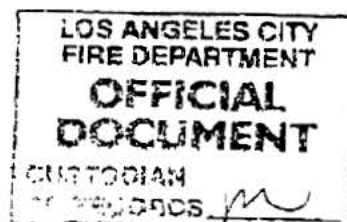
DATES: ALARM 081702 SCENE 081702 TRANS HOSP CMPLT 081702
TIMES: 0940 0945 1000

NUMBER OF PERSONNEL: 4 FIREFIGHTER INJURIES: 0 FATALITIES: 0

COMMENTS: UNKNOWN CAUSE, 2001 VEHICLE WITH LOW MILEAGE, NO SIGN OF SUSPICIO
US ACT HOOD CLOSED UPON FD ARRIVAL
.....

F902M STATUS CODE: ...

MEMBER ID #: RW2706 NAME: [REDACTED]



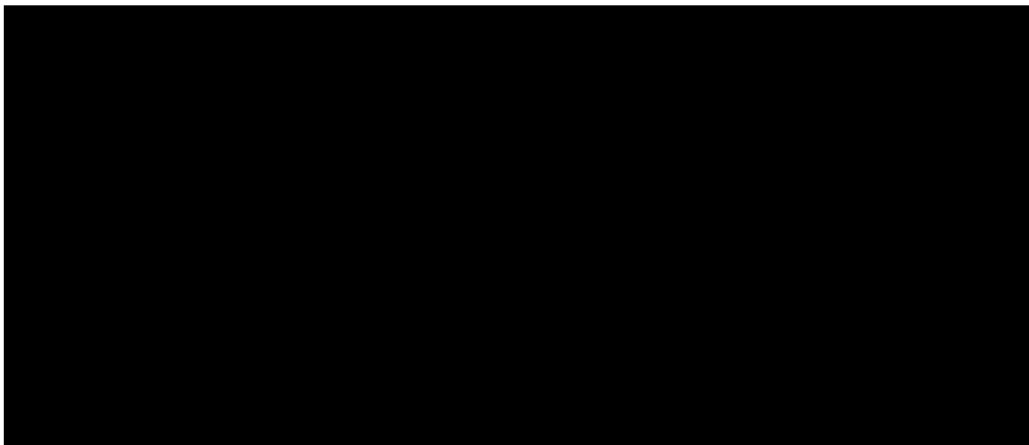
ENTER=SEND REPORT; CTRL(LEFT ONLY)=RESET; F2=CANCEL REPORT;
F7=PAGE BACKWARD; F8=PAGE FORWARD; F12=SIGN OFF

10/21/03 TUE 10:06 [TX/RX NO 7484]

OCT 22 2023 14:38

PAGE 04

PE06-048-0074LC



State Farm Insurance Companies



October 17, 2003

Attn: Ruth Davis
Ford Motor Company
PO Box 6248, MD 3Nf-B
Dearborn, MI 48126

State Farm Insurance Co.
3743 Boettler Oaks Dr. Suite C
Uniontown, OH 44685
Phone: 330-899-8410
Fax: 330-899-8968
Toll Free: 866-657-3128

CONSUMER AFFAIRS
SECTION

3 OCT 28 A9:20

RE: Claim Number: [REDACTED]
Date of Loss: June 14, 2003
Our Insured: [REDACTED]

OCT 28 2003

Dear Ms. [REDACTED]

Our investigation indicates you may be responsible for the above referenced incident.

Our policy entitles us to collection of payments paid to or on behalf of our insured. If you have insurance to protect you against such liability, refer this letter to your insurance company and advise me as to your insurance company's name, address, and policy number.

Please complete the information below and return it to me in the envelope provided.

Insurance Company and/or Agent: _____

Address: _____

Phone Number: _____

Policy and/or Claim Number: _____

If you do not have insurance, please call us so that we can discuss payment of your debt.

6/14/03

1

11/11/2016

[REDACTED]

Plaintiffs,

V.

Cleveland, Ohio

and

METRO TOWING
4066 E. 71st Street
Cleveland, Ohio 44105,

and

FORD MOTOR COMPANY
Parklane Towers West, Suite 300
Three Parklane Boulevard
Dearborn, MI 48126-2568,

Defendants.

[illegible]

Case No. _____

Judge _____

COMPLAINT

1. At all times herein mentioned, Plaintiff [REDACTED] was the owner of a 2001 Ford Escape automobile, which became disabled in a parking lot in Middleburg Heights, Ohio on June 14, 2003.

2. Defendant Ford Motor Company, in connection with the sale of said vehicle to Plaintiff [REDACTED], provided a service to the Plaintiff known as the Ford Roadside Assistance Program, which entitled the Plaintiff to contact Defendant Ford Motor Company to assist in the transport of said motor vehicle if and when it became disabled.

3. Plaintiffs allege that Plaintiff contacted Ford Motor Company for said purpose and Defendant Ford Motor Company, through said program, arranged for said vehicle to be towed by Defendant Metro Towing.

4. Plaintiffs allege that Defendant [REDACTED] an employee of Defendant Metro Towing, in response to the call placed by Defendant Ford Motor Company, arrived at the Middleburg Heights location and connected Plaintiff's vehicle to the tow truck for the purpose of transporting said vehicle to a repair facility in Portage County, Ohio.

5. Plaintiffs allege that Defendant Jason Anderson was negligent in connecting the disabled motor vehicle of the Plaintiff to said tow truck and as a result of Defendant's negligence, Plaintiff's above-described motor vehicle caught fire while in route to the repair facility in Portage County, Ohio.

6. As a result of Defendant Jason Anderson's negligence, Defendant Metro Towing, as his employer, is vicariously liable for said Defendant's negligence, as said Defendant [REDACTED] was acting in the course and scope of his employment at the time of said negligence.

7. Plaintiffs further allege that Defendant Ford Motor Company is liable to the Plaintiffs for the damages caused by Defendant Jason Anderson's negligence in that Ford Motor Company arranged for said tow through the Ford Roadside Assistance Program and Defendant Jason Anderson and his employer, Defendant Metro Towing, were acting as the agent of Defendant Ford Motor Company in connection with the towing of said motor vehicle.

8. Plaintiffs allege that Defendant Ford Motor Company is vicariously liable for the negligence of Defendant [REDACTED] and Defendant Metro Towing in connection with the improper tow.

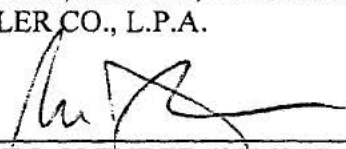
9. At the time of said incident, Plaintiff State Farm Mutual Automobile Insurance Company was the automobile insurance carrier for Plaintiff [REDACTED] and provided full insurance coverage, including comprehensive coverage from fire and other perils.

10. As a result of the above-described incident, Plaintiff's motor vehicle was damaged in the sum of \$15,584.29 and pursuant to said policy of insurance, Plaintiff State Farm Mutual Automobile Insurance Company paid the sum of \$15,334.29 for the damage sustained to said vehicle and is subrogated to the rights of its insured to the extent of said payment.

11. Plaintiff [REDACTED] sustained a \$250.00 deductible as a result of the negligence of the Defendants.

WHEREFORE, Plaintiffs State Farm Mutual Automobile Insurance Company and [REDACTED] pray judgment against Defendants Jason Anderson, Metro Towing and Ford Motor Company, jointly and severally, in the total sum of \$15,584.29 plus interest as provided by law and costs incurred in this action.

STRACHAN, MILLER, OLENDER &
ROESSLER CO., L.P.A.



ROBERT J. OLENDER (0016245)

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Fax: (216) 621-7175



5255 Commerce Parkway West • Parma • OH • 44130
Phone: (440)887-0645 • Fax: (216)398-7202

October 1, 2003

State Farm Insurance Company
3743 Boettler Oaks, Suite C
Uniontown, Ohio 44685

ATT: Ms Vita Moore

RE:	INSURED:	[REDACTED]
	TYPE OF VEHICLE:	2001 Ford Escape
	DATE OF LOSS:	June 14, 2003
	CLAIM NO:	[REDACTED]
	OUR FILE NO:	OR521

Dear Ms Moore:

This report is in regard to the fire origin and cause evaluation of a 2001 Ford Escape bearing short VIN [REDACTED]. Examination of the subject vehicle was requested by your office on September 15, 2003. The examination of the vehicle took place at the insured's residence, [REDACTED] in Ravenna, Ohio on Sept 17, 2003.

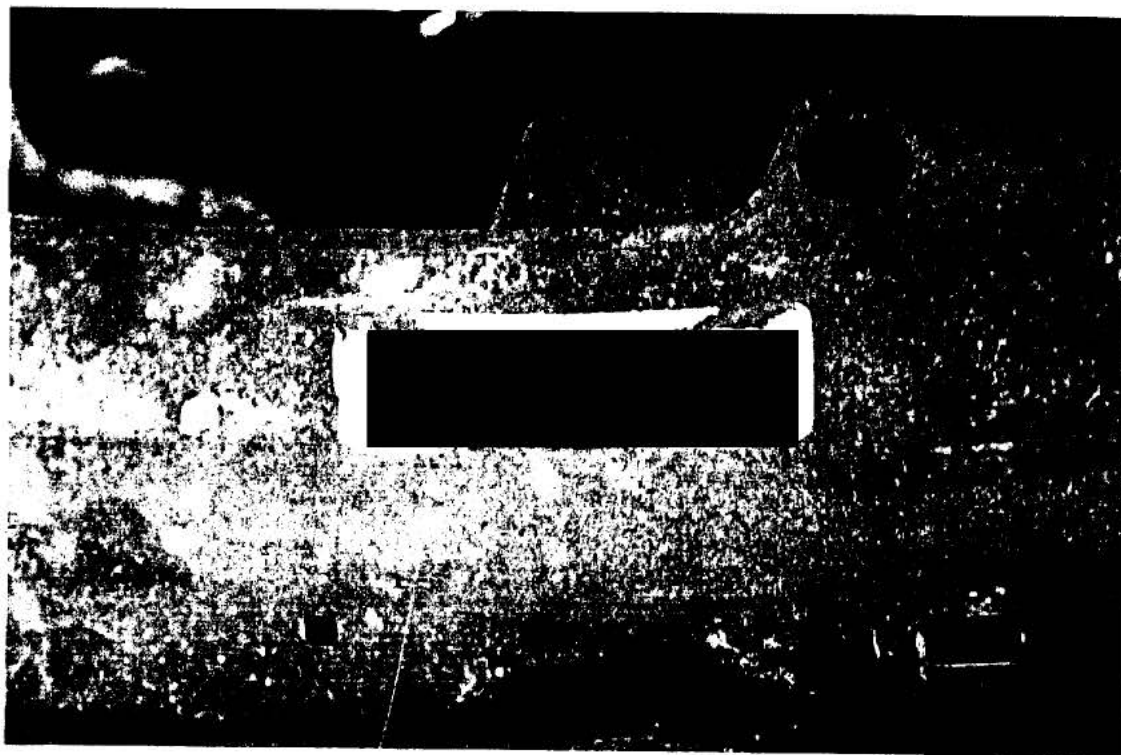
During the evaluation, full photo documentation of the vehicle was performed. Any photographs not used in this report will be maintained in the file for a period of up to ten (10) years. Should further photo documentation become necessary, please contact my office and arrangements will be made.

During the examination of the vehicle, I was able to speak to [REDACTED] with regard to the events that took place on the above captioned Date of Loss. He stated that his daughter was driving the vehicle and was at a shopping mall on the west side of Cleveland. The vehicle was left unattended for a short period and when his daughter came out to the vehicle and attempted to start it, it would not start. She called Ford Roadside Assistance so that the vehicle could be towed. She wanted the vehicle towed back to facilities near her residence, although Ford Roadside Assistance stated that they would have to tow it to the closest dealership for repair. She agreed to pay the difference in the towing charges so that it could be towed closer to her residence in Ravenna. Ford Roadside Assistance dispatched a tow truck from Metro Towing that was driven by Mr. Jason Anderson. The vehicle was then towed from the parking lot en route to the dealership chosen by [REDACTED].

According to the fire report by [REDACTED] he was towing the vehicle on the Turnpike, and at or around the 186-mile mark, he noticed smoke coming from the vehicle. He then stopped and found a fire under the hood. He unhooked the vehicle from his tow truck and the fire department responded. When the fire department responded, they found a fully involved vehicle fire, including the passenger compartment.

Examination of the subject vehicle began with verification that the cowl-mounted VIN plate, seen in Figure No. 1, matched the VIN supplied by your office. The VIN plate was heavily damaged by the vehicle fire, although certain digits were still able to be recognized and the VIN did identify the subject vehicle.

FIGURE #1



At this time I proceeded with an exterior evaluation of the subject vehicle to determine the burn patterns. It was found that the burn patterns correlated with the witness statement given by Mr. [REDACTED] that the fire erupted within the engine compartment of the vehicle. Figure No. 2 shows a view of the forward portion of the vehicle. I did not find any evidence of collision damage in the forward portion of the vehicle that may have caused or contributed to the fire.

Upon my arrival, I was informed by [REDACTED] that the vehicle appeared to have a dead battery, hence the need for it to be towed. Since the battery was discharged, this would eliminate the possibility of an electrical failure that may have caused the vehicle fire. An adequate voltage supply is needed to produce any type of electrical current that may cause an electrical fire.

Please note in Figure No. 2 that there is heavy engine compartment fire involvement. The burn patterns found within the engine compartment will be described later in this report. The preliminary evaluation of the engine compartment indicated that the fire erupted at and around the left side of the engine compartment near the transmission. It should be noted that this is a front-wheel drive vehicle with a transverse mounted engine and transaxle assembly.

FIGURE #2



Figure No. 3 shows a view of the left side of the subject vehicle. Burn patterns extended from the engine compartment into the passenger compartment of the vehicle, mitigating toward the rear. The front tire was completely consumed. There were significant hotspots at and around the left fender, which matched hotspots found on the hood of the subject vehicle at and around the left side. This will be depicted later in this report. Burn patterns found on the left side of the vehicle were much more severe than those found on the right, indicating a greater fuel load on the left side of the vehicle as well as the initial ignition area of the fire.

FIGURE #3



Figure No. 4 shows a view of the right side of the subject vehicle. Burn patterns mitigated toward the rear of the vehicle, although the front door and fender showed significant flame impingement. The right front tire was completely consumed. The hotspots found on the right side fender were not as significant as those found on the left side fender.

FIGURE #4



Figure No. 5 shows a view of the right side of the subject vehicle as seen from the rear. During the evaluation, I did not find any evidence of collision damage that may have caused or contributed to the fire. The fire damage mitigated at and around the mid door area rearward. The interior of the vehicle was heavily damaged by the fire, predominantly in the forward portion, mitigating toward the mid and rear sections.

FIGURE #5



Figures No. 6 and 7 show rear and left rear views of the vehicle. Minimal exterior fire damage was present at and around these areas.

FIGURE #6



FIGURE #7



Figure No. 8 shows a view of the left side mid and rear sections of the vehicle, exhibiting the burn patterns found on the doors. The burn patterns mitigated toward the rear of the subject vehicle. The burn patterns found on the exterior portion of the vehicle indicated a front to rear progression of fire. This correlates with the witness statement indicating that the fire erupted in the engine compartment.

FIGURE #8



Figure No. 9 shows a view across the hood of the subject vehicle. During the evaluation of the burn patterns found on the hood, I found significant hotspotting on the left side with fire patterns progressing toward the mid area and right side of the subject vehicle as well as the forward portion of the vehicle.

FIGURE #9



Figure No. 10 shows a view of the underside of the hood. The flame impingement patterns on the underside of the hood were more significant on the left side, decreasing toward the right side.

FIGURE #10



Figures No. 11 and 12 show views of the interior of the subject vehicle. The forward passenger compartment showed very heavy fire damage, consuming the front seats and seat bottoms as well as the dashboard of the vehicle. The mid section seating area still contained some seat bottom foam. This is consistent with fire traveling from front to rear. Fire will rise in an upward and outward progression until striking a horizontal object, such as the roof of the vehicle, at which time it will travel horizontally across that surface. This creates a rollover effect for a fire traveling from front to rear. This will consume the rear seatback prior to the rear seat bottom. All directional burn patterns found within the passenger compartment of the vehicle indicate a front to rear progression. Examination of the remaining dashboard components, including the condenser assembly, indicated that the fire erupted in the engine compartment, traveling through the bulkhead and the windshield area into the passenger compartment.

FIGURE #11



FIGURE #12

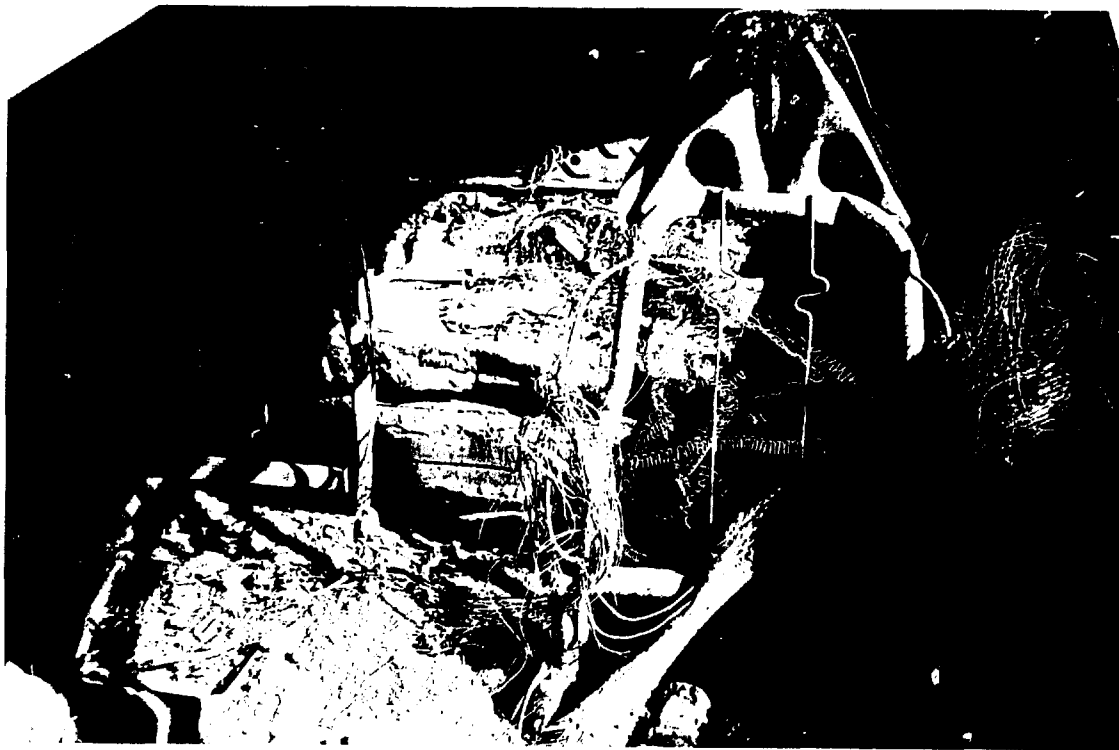


Figure No. 13 shows a view of the dashboard across the cowl area. The condenser was burned from the bulkhead side inward. This shows an engine compartment to passenger compartment progression of fire.

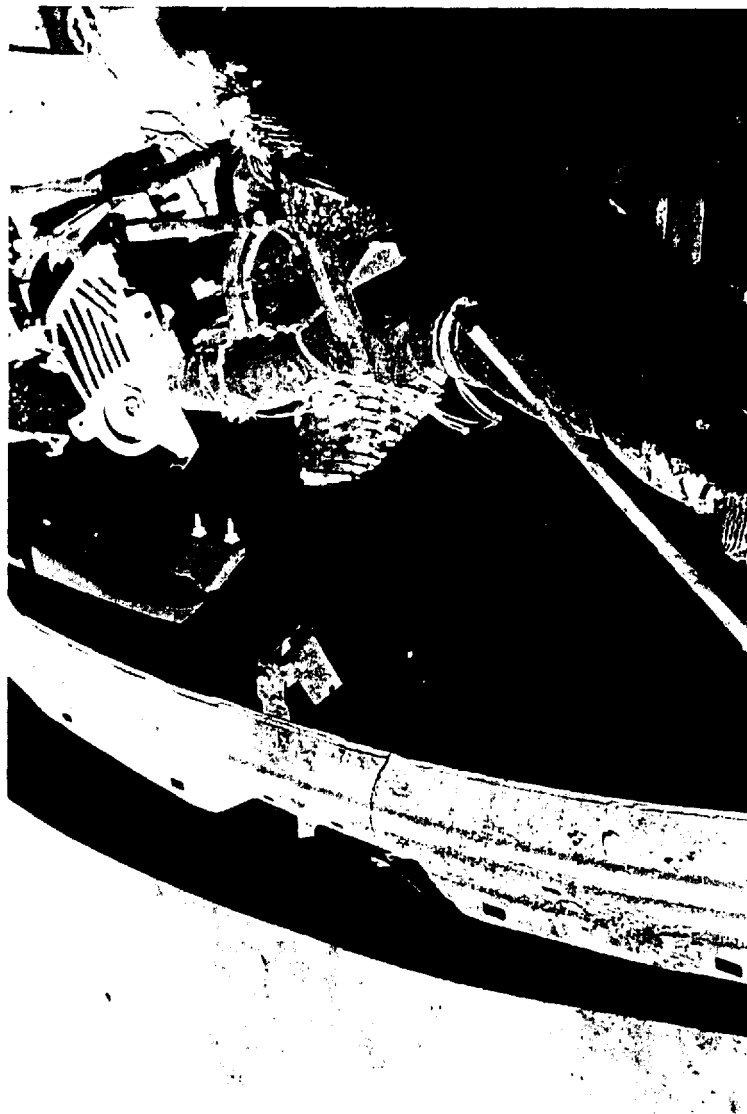


FIGURE #13

At this time I began an evaluation of the engine and engine compartment. Figure No. 14 shows a view of the engine compartment as seen from the left front fender area. The components found on the left side of the engine compartment showed significant fire damage, including soft metal melting. The battery was nearly completely consumed. The master cylinder was consumed by fire. Heavy plastic and soft metal destruction were found throughout the left side area. The left side engine compartment was considered to be the area of fire origination. The fire damage mitigated toward the right side.

FIGURE #14

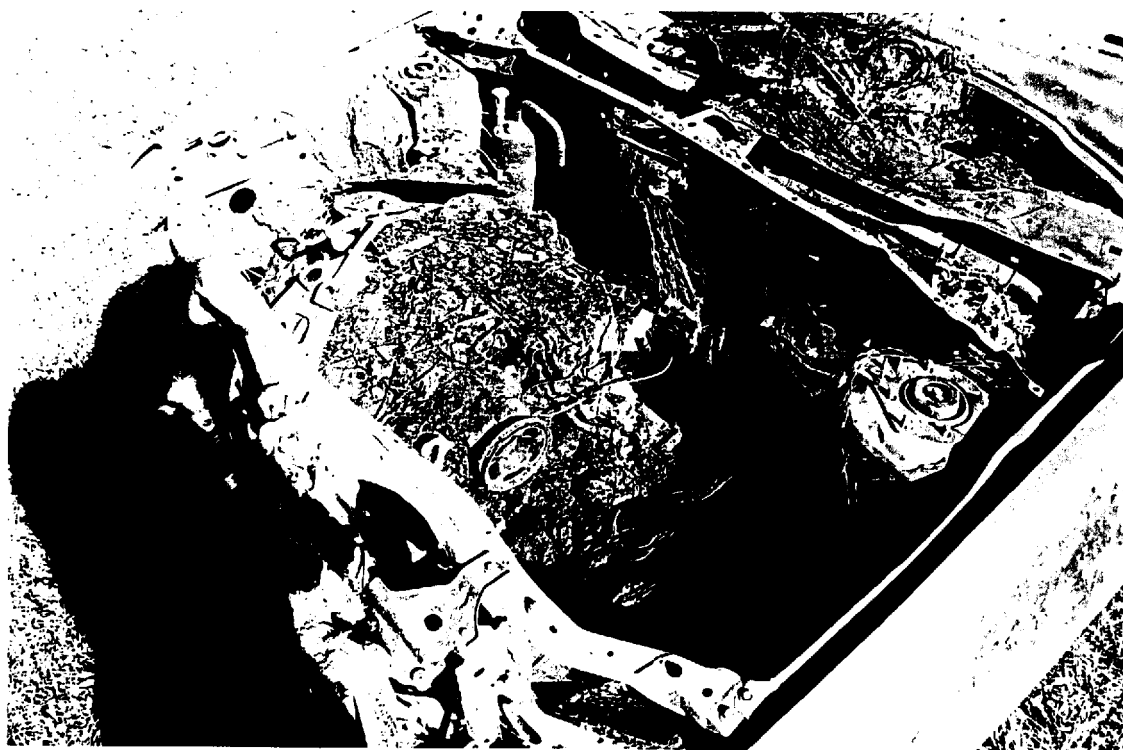
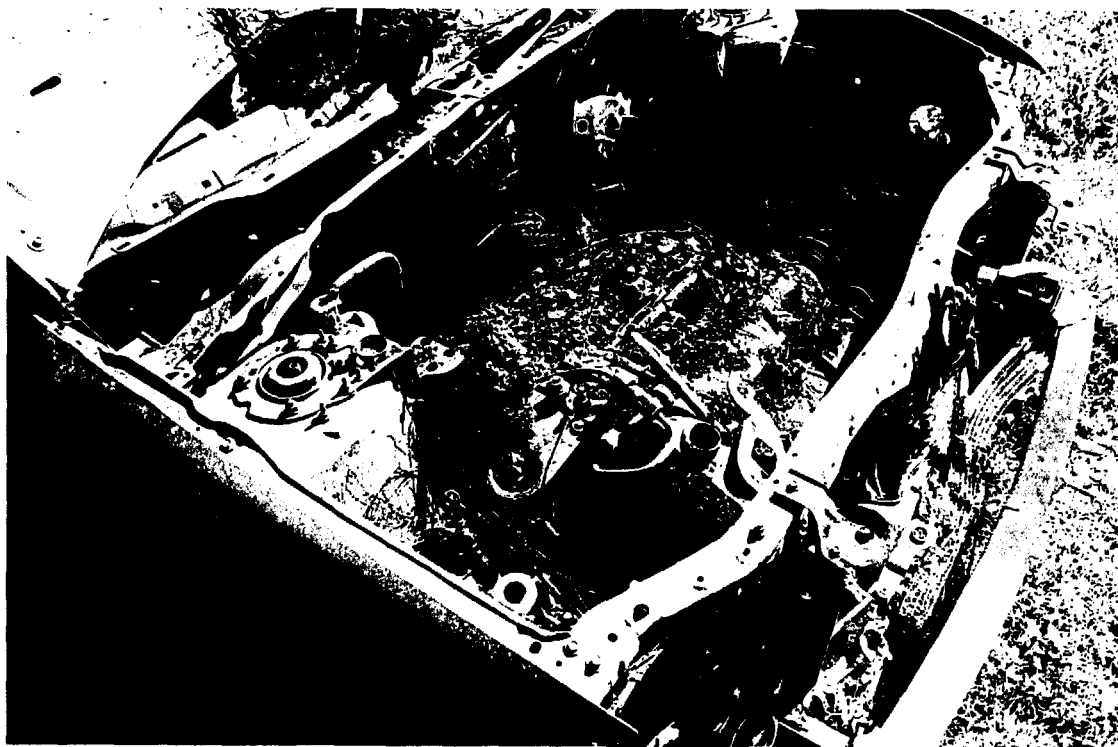


Figure No. 15 shows a view of the engine and engine compartment as seen from the right side. The right side engine compartment suffered extensive damage, although the burn patterns found on the right side indicated a left to right progression. This was found in not only the soft metal, but also in the remaining plastic and combustible components.

FIGURE #15



Figures No. 16, 17 and 18 show closer views of the left side engine compartment. Please note that the transmission is present on the left side of the engine. During the examination of the vehicle, it was found that the transmission fluid was not readable on the dipstick or any other measuring device used. This would give indication that fluid expulsion took place from the transmission assembly. Fluid expulsion will not take place on a non-running vehicle unless it is towed improperly. This is a front wheel drive vehicle that must be towed from the front if it is wheel-lifted, or on a flatbed, or by using dollies on the front wheels if it necessary to tow it from the rear.

When towing a front wheel drive vehicle from the rear with the front wheels on the ground, even if the transmission is in "NEUTRAL", internal components of the transmission are moving and lubrication is not available. This results in friction heating and eventual component failure that can result in a vehicle fire. Taking into consideration that the fluid level in the transmission was not readable on any type of measuring device, and that the remnant of fluid that was retrieved from the transmission was black, this would give indication that the transmission overheated during towing procedures. This would result in expulsion of fluid and/or case fracture. The friction heating that will take place inside the transaxle assembly is sufficient to ignite fluid, especially if a case breach takes place. The transmission case will generate radiant heat to the nearby combustible components due to the fact that no cooling of the transmission can take place because fluid circulation is not present.

It was more than apparent that the fire erupted at and around the left side engine compartment, and taking into consideration that the vehicle was in fact towed improperly and that the fluid level was nearly void in the transmission, it can be concluded that the improper towing procedures resulted in a transmission failure and fire.

FIGURE #16

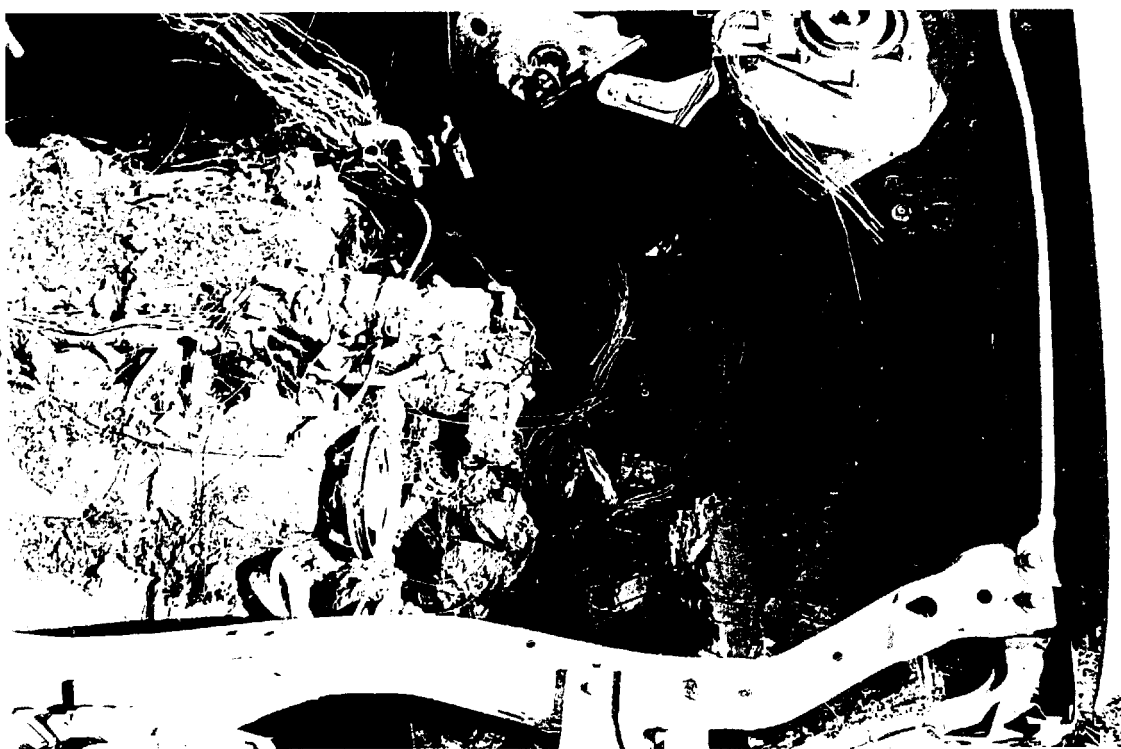


FIGURE #17

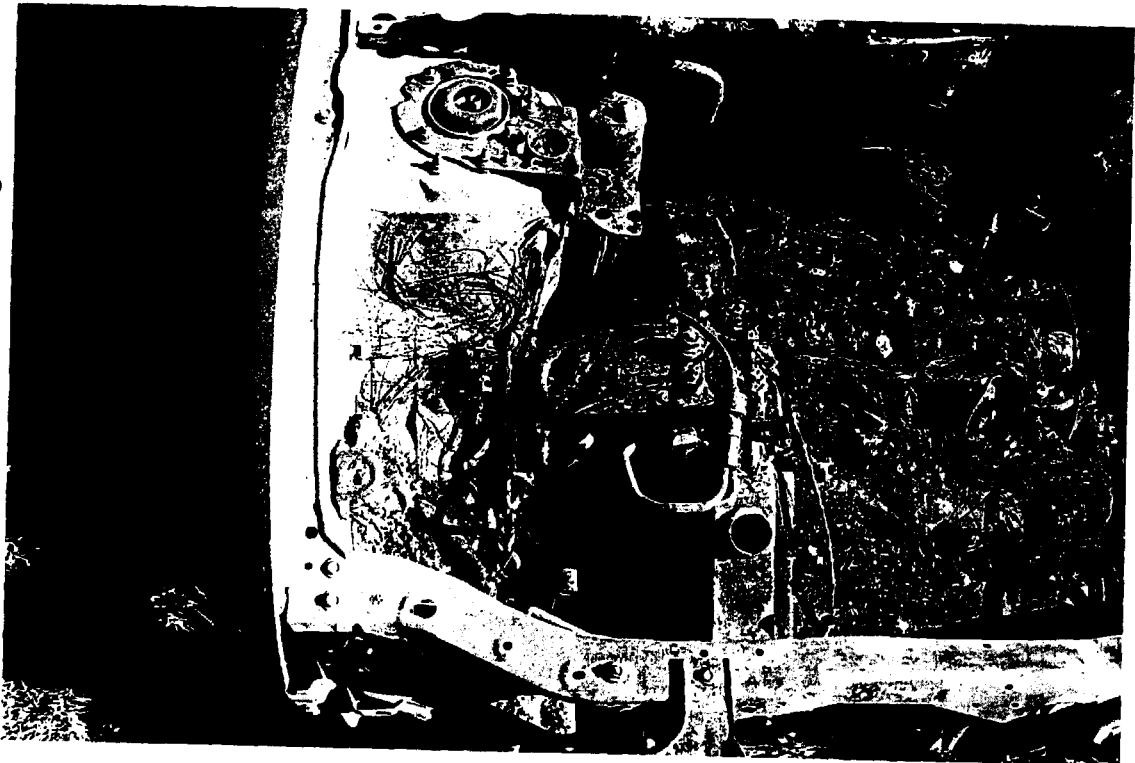


FIGURE #18



Figure No. 19 shows a view of the right side engine compartment in comparison to the left. Please note that less substantial damage is present on the right side compared to the left. The directional burn patterns also go from left to right.

FIGURE #19



Following a thorough and complete evaluation of all remaining evidence in this case, and based on my knowledge, training and years of experience as a Forensic Mechanic and Vehicle Fire Investigator, it is my professional opinion that the fire that took place in this vehicle was a result of improper towing procedures. It was apparent that the vehicle was towed from the rear without the use of dollies on the front wheels. This towing procedure cannot take place on a front wheel drive vehicle. The improper towing resulted in movement of internal components in the transmission, which resulted in friction heat and extreme heat buildup, which would have caused the ignition of nearby plastic and combustible components external to the transmission, fluid expulsion and/or transmission case failure. Any of the above will cause the ignition of components, including the transmission fluid and nearby combustible products.

Further disassembly of the transmission can be performed to further this opinion. No further disassembly took place at the time of this examination due to the fact that a third party evaluation is anticipated. If this third party evaluation is requested, please contact my office so that all available parties can be present during the inspection. No destructive testing was performed at the time of my evaluation and the opinions are based on the burn patterns and available evidence. It is my opinion that disassembly of the transmission will further the opinion that the vehicle was towed incorrectly, which resulted in the vehicle fire.

If I can be of any further assistance in this matter, please feel free to contact me at any time.

Respectfully Submitted,



Mark Sargent
Forensic Mechanic
Licensed Investigator
Ohio License No. 6868
ASE Recertified Master Technician

MS/sk

67027 FDID *	OH State *	06 Incident Date *	2003 Year	1 Station	03-000064 Incident Number *	000 Exposure *	☐ Delete ☐ Change ☐ No Activity	NFIRS -1 Basic			
B Location* ☐ Check this box to indicate that the address for this incident is provided on the Wildland Fire module in Section B "Alternative Location Specification". Use only for Wildland fires.											
Census Tract 0001 - 00 ☒ Street address 186 I-80 OTP Number/Milepost Prefix Street or Highway Street Type Suffix ☐ Intersection ☐ In front of ☐ Rear of ☐ Adjacent to ☐ Directions Apt./Suite/Room City State Zip Code OH 44241 Cross street or directions, as applicable											
C Incident Type * 131 Passenger vehicle fire Incident Type			E1 Date & Times Midnight is 0000 Check boxes if dates are the same as Alarm Alarm always required Date Alarm * 06 14 2003 16:53:00 Month Day Year Hr Min Sec ARRIVAL required, unless canceled or did not arrive ☒ Arrival * 06 14 2003 17:10:00 CONTROLLED Optional. Except for wildland fires ☒ Controlled 06 14 2003 17:21:00 LAST UNIT CLEARED, required except for Wildland fires ☒ Last Unit ☒ Cleared 06 14 2003 17:35:00			E2 Shift & Alarms Local Option Shift or Alarms District Platoon B 7					
D Aid Given or Received* 1 ☐ Mutual aid received 2 ☐ Automatic aid rec'd. 3 ☐ Mutual aid given 4 ☐ Automatic aid given 5 ☐ Other aid given N ☒ None Their FDID Their State Their Incident Number			E3 Special Studies Local Option Special Study ID# Special Study Value								
F Actions Taken * 11 Extinguish Primary Action Taken (2) Additional Action Taken (2) Additional Action Taken (3)			G1 Resources * ☒ Check this box and skip this section if an Apparatus or Personnel form is used. Apparatus Personnel Suppression 0002 0004 EMS Other ☐ Check box if resource counts include aid received resources.			G2 Estimated Dollar Losses & Values LOSSES: Required for all fires if known. Optional for non fires. None Property \$ 016,000 Contents \$ 000,000 PRE-INCIDENT VALUE: Optional Property \$ 016,000 Contents \$ 000,000					
Completed Modules ☒ Fire-2 ☐ Structure-3 ☐ Civil Fire Cas.-4 ☐ Fire Serv. Cas.-5 ☐ EMS-6 ☐ HazMat-7 ☐ Wildland Fire-8 ☒ Apparatus-9 ☒ Personnel-10 ☐ Arson-11			H1*Casualties None Deaths Injuries Fire Service Civilian H2 Detector Required for Confined Fires. 1 ☐ Detector alerted occupants 2 ☐ Detector did not alert them U ☐ Unknown			H3 Hazardous Materials Release N ☐ None 1 ☐ Natural Gas: slow leak, no evacuation or HazMat actions 2 ☐ Propane gas: c21 lb. tank (as in home BBQ grill) 3 ☐ Gasoline: vehicle fuel tank or portable container 4 ☐ Kerosene: fuel burning equipment or portable storage 5 ☐ Diesel fuel/fuel oil: vehicle fuel tank or portable 6 ☐ Household solvents: home/office spill, cleanup only 7 ☐ Motor oil: from engine or portable container 8 ☐ Paint: from paint cans totaling < 55 gallons 0 ☐ Other: special HazMat actions required or spill > 55gal., Please complete the HazMat form			I Mixed Use Property NN ☐ Not Mixed 10 ☐ Assembly use 20 ☐ Education use 33 ☐ Medical use 40 ☐ Residential use 51 ☐ Row of stores 53 ☐ Enclosed mall 58 ☐ Bus. & Residential 59 ☐ Office use 60 ☐ Industrial use 63 ☐ Military use 65 ☐ Farm use 00 ☐ Other mixed use		
J Property Use* Structures 131 ☐ Church, place of worship 161 ☐ Restaurant or cafeteria 162 ☐ Bar/Tavern or nightclub 213 ☐ Elementary school or kindergarten 215 ☐ High school or junior high 241 ☐ College, adult education 311 ☐ Care facility for the aged 331 ☐ Hospital			341 ☐ Clinic, clinic type infirmary 342 ☐ Doctor/dentist office 361 ☐ Prison or jail, not juvenile 419 ☐ 1-or 2-family dwelling 429 ☐ Multi-family dwelling 439 ☐ Rooming/boarding house 449 ☐ Commercial hotel or motel 459 ☐ Residential, board and care 464 ☐ Dormitory/barracks 519 ☐ Food and beverage sales			539 ☐ Household goods, sales, repairs 579 ☐ Motor vehicle/boat sales/repair 571 ☐ Gas or service station 599 ☐ Business office 615 ☐ Electric generating plant 629 ☐ Laboratory/science lab 700 ☐ Manufacturing plant 819 ☐ Livestock/poultry storage (barn) 882 ☐ Non-Residential parking garage 891 ☐ Warehouse					
Outside 124 ☐ Playground or park 655 ☐ Crops or orchard 669 ☐ Forest (timberland) 807 ☐ Outdoor storage area 9 ☐ Dump or sanitary landfill 1 ☐ Open land or field			936 ☐ Vacant lot 938 ☐ Graded/care for plot of land 946 ☐ Lake, river, stream 951 ☐ Railroad right of way 960 ☐ Other street 961 ☒ Highway/divided highway 962 ☐ Residential street/driveway			981 ☐ Construction site 984 ☐ Industrial plant yard Lookup and enter a Property Use code only if you have NOT checked a Property Use box: Property Use 961 Highway or divided highway					

NFIRS-1 Revision 03/11/99

TRAFFIC CRASH REPORT

OH-1 (Rev. 10/99)



1D-91-327

 CRASH SEVERITY
 1 FATAL 3 FDO
 2 INJURY 4 UNKNOWN

 PRIVATE PROPERTY
 YES/NO
 1 NOT YES/NO
 2 SOLID
 3 UNKNOWN

 PHOTOS
 TAKEN
 X

 OH-2 OH-3 OH-4P Other
 X X X

DAY OF WEEK

SAT

NAME (OF CITY, VILLAGE OR TOWNSHIP) &

STREETSBO

LATITUDE

67

LONGITUDE

 STREET LIGHTS
 YES/NO
 X

TYPE LOG

 TYPE LOCATION POINT USED
 1 NAMED STREET 3 NUMBERED ROUTE
 2 NUMBERED STREET

M.P. 185.6

 REPORT MADE BY
 1 M W

M.P. 186

REF POINT

 REFERENCE POINT USED
 01 STATE LINE
 02 INTERSECTION 2 STREETS
 03 COUNTY LINE

 04 ROSS NUMBER
 05 TOWNSHIP BOUNDARY
 06 MILE POST
 07 CORPORATION LIMIT
 08 PLACE NAME WHO REFERENCE
 09 DIRECTION
 10 STREET OR ROUTE WHO REFERENCE

0101

NAME (LAST, FIRST, MIDDLE)

CLEVELAND, OH

0-00-1973 29 M

DL STATE

OH

LP STATE

OH

INSURED

BY

 1 NONE 4 OTHER
 2 EMS 5 UNKNOWN
 3 POLICE

TRANSPORTED BY

NONE

INJURED TAKEN TO

OWNER NAME (IF SAME, WRITE "SAME")

ADDRESS (STREET, CITY, STATE, ZIP CODE)

YEAR

2000

MAKE

FORD

MODEL

F-SSD

COLOR

RED

INSURANCE COMPANY

TOWING SERVICE

RIVER'S

OWNER PHONE #

OFFICER CHARGED

OFFICER DESCRIPTION

NAME (LAST, FIRST, MIDDLE)

ADDRESS (STREET, CITY, STATE, ZIP CODE)

DL STATE

OH

LP STATE

OH

INSURED

BY

 1 NONE 4 OTHER
 2 EMS 5 UNKNOWN
 3 POLICE

TRANSPORTED BY

NONE

INJURED TAKEN TO

OWNER NAME (IF SAME, WRITE "SAME")

ADDRESS (STREET, CITY, STATE, ZIP CODE)

YEAR

2000

MAKE

FORD

MODEL

F-SSD

COLOR

RED

INSURANCE COMPANY

TOWING SERVICE

RIVER'S

OWNER PHONE #

OFFICER CHARGED

OFFICER DESCRIPTION

NAME (LAST, FIRST, MIDDLE)

HOME PHONE #

ADDRESS (STREET, CITY, STATE, ZIP CODE)

 INJURED TAKEN BY
 1 NONE 4 OTHER
 2 EMS 5 UNKNOWN
 3 POLICE

TRANSPORTED BY

INJURED TAKEN TO

NAME (LAST, FIRST, MIDDLE)

HOME PHONE #

ADDRESS (STREET, CITY, STATE, ZIP CODE)

 INJURED TAKEN BY
 1 NONE 4 OTHER
 2 EMS 5 UNKNOWN
 3 POLICE

TRANSPORTED BY

INJURED TAKEN TO

 SEATING POSITION
 01 FRONT - LEFT (MC DRIVER)
 02 FRONT - MIDDLE
 03 FRONT - RIGHT
 04 SECOND - LEFT (MC PASSENGER)
 05 SECOND - MIDDLE
 06 SECOND - RIGHT
 07 THIRD - LEFT
 08 THIRD - MIDDLE
 09 THIRD - RIGHT
 10 SLEEPING POSITION OF CAB
 11 ENCLOSED CARGO AREA
 12 UNENCLOSED CARGO AREA
 13 TRAILING UNIT
 14 EXTENSION
 15 OTHER
 16 NON-MOTORIST
 17 UNKNOWN

 SAFETY EQUIPMENT
 01 NONE USED
 02 SHOULDER BELT ONLY
 03 LAP BELT ONLY
 04 SHOULDER/LAP BELT
 05 CHILD SAFETY SEAT
 06 MC PASSENGER SEAT
 07 USE UNKNOWN
 08 NON-MOTORIST
 09 NONE USED
 10 HELMET USED
 11 PROTECTIVE PANTS
 12 REFLECTIVE CLOTHING
 13 LIFELINE
 14 OTHER
 15 UNKNOWN

 AIR BAG
 1 NOT DEPLOYED
 2 DEPLOYED - FRONT
 3 DEPLOYED - SIDE
 4 DEPLOYED - BOTH
 5 NOT APPLICABLE
 6 UNKNOWN

 AIR BAG SWITCH
 1 NOT PRESENT
 2 IN ON POSITION
 3 IN OFF POSITION
 4 UNKNOWN

 EJECTION
 1 NOT EJECTED
 2 TOTALLY EJECTED
 3 PARTIALLY EJECTED
 4 NOT APPLICABLE
 5 UNKNOWN

 TRAPPED
 1 NOT TRAPPED
 2 EJECTED BY MECHANICAL MEANS
 3 FELL BY NON-MECHANICAL MEANS
 4 UNKNOWN

 INJURED
 1 NO INJURY
 2 POSSIBLE
 3 NON-INFLAMMATING
 4 INFLAMMATING
 5 FATAL INJURY
 6 UNKNOWN

Motorist/Non-Motorist

BLANK FOR WITNESS

H07701

Top Copy - COPS Bottom Copy - Agency

UNIT NUMBERS	DAMAGE AREA	PRE-CRASH ACTIONS	SEQUENCE OF EVENTS	POSTED SPEED	DRUG TEST STATUS
01		01	02	65	1
NON-MOTORIZED LOCATION 01 DAMAGED CROSSWALK AT INTERSECTION 02 INTERSECTION/NO CROSSWALK 03 NON-INTERSECTION CROSSWALK 04 DRIVEWAY ACCESS CROSSWALK 05 IN ROADWAY 06 NOT IN ROADWAY 07 MEDIAN (NOT RUT SHOULDER) 08 ISLAND 09 SHOULDER 10 SIDEWALK 11 WITHIN 10 FEET OF ROADWAY (NOT SHOULDER, MEDIAN, SIDEWALK, ISLAND) 12 BEYOND 10 FEET OF ROADWAY (OTHER THRUWAY) 13 OUTSIDE THRUWAY 14 SHARED USE PATHS OR TRAILS 15 UNKNOWN	MOST DAMAGED AREA 01 NONE 02 CENTER FRONT 03 FRONT FRONT 04 FRONT SIDE 05 FRONT REAR 06 REAR CENTER 07 LEFT REAR 08 LEFT SIDE 09 LEFT FRONT 10 TOP AND WINDOWS 11 UNDERCARRIAGE 12 LOAD/TRAILER 13 TOTAL (ALL AREAS) 14 OTHER 15 UNKNOWN	CONTRIBUTING CIRCUMSTANCES 01 NONE 02 FAILURE TO YIELD 03 RUN RED LIGHT, OR STOP SIGN 04 EXCEEDED SPEED LIMIT 05 VIOLATED STOP 06 VIOLATED TURN 07 LEFT OF CENTER 08 FOLLOWED TOO CLOSELY/ACCID 09 IMPROPER LANE CHANGE/ 10 DROVE OFF ROAD/ 11 IMPROPER PASSING 12 IMPROPER START FROM PARKED POSITION 13 STOPPED ON PARKED ILLEGALLY 14 OPERATING VEHICLE IN IMPROPER, RECKLESS, CARELESS, NEGLECT OR ABANDONED MANNER 15 SLEEPING TO AVOID (DUE TO WEAR, SLEEPY, SORRY, VEHICLE, DEFECT, NON-MOTORIZED IN ROADWAY, ETC) 16 FAILURE TO CONTROL 17 VISION OBSTRUCTION 18 DRIVER INATTENTION 19 FADDED/ASLEEP 20 OPERATING DEFECTIVE EQUIPMENT 21 LOAD SHIFTING/FALLING/BUILDING 22 OTHER IMPROPER ACTION 23 UNKNOWN 24 OTHER 25 UNKNOWN	NON-COLLISION 01 OVERTURN/FLIP 02 FIRE/EXPLOSION 03 IMPROPER 04 JACKKNIFE 05 CIRCUMSTANTIAL LANE/SHIFT 06 EQUIPMENT FAILURE 07 SEPARATION OF UNITS 08 RAN OFF ROAD RIGHT 09 RAN OFF ROAD LEFT 10 CROSS MEDIAN/CENTERLINE 11 CORNER RUMBLE 12 OTHER NON-COLLISION 13 UNKNOWN NON-COLLISION 14 COLLISION W/ PERSONAL VEHICLE, OR OBJECT, NOT DRUG 15 PERSONAL 16 PENALTY 17 RAILWAY VEHICLE 18 ANIMAL - FARM 19 ANIMAL - DEER 20 ANIMAL - OTHER 21 MOTOR VEHICLE IN TRANSPORT 22 PARKED MOTOR VEHICLE 23 WORK ZONE MAINTENANCE EQUIPMENT 24 OTHER MOVABLE OBJECT 25 COLLISION W/ OTHER OBJECT 26 IMPACT ATTENTION/CHASM CURB 27 BRIDGE OVERHUNG STRUCTURE 28 BRIDGE PIER ON RIGHT/LEFT 29 BRIDGE PIER 30 CURB/RAIL 31 CURB/FACE 32 CHANGING END 33 MEDIAN BARRIER 34 HIGHEST TRAFFIC SIGN POST 35 OVERHEAD SIGN POST 36 LIGHT/ILLUMINATED SUPPORT 37 UTILITY POLE 38 OTHER POST, POLE OR SUPPORT 39 CURB 40 DITCH 41 EMBANKMENT 42 FENCE 43 MAILBOX 44 TREE 45 OTHER FIXED OBJECT 46 WORK ZONE MAINTENANCE EQUIPMENT 47 UNKNOWN FIXED OBJECT 48 OTHER 49 UNKNOWN	TRAFFIC CONTROL 01 NO CONTROL 02 STOP SIGN 03 YIELD SIGN 04 TRAFFIC SIGNAL 05 TRAFFIC FLARE 06 SCHOOL ZONE 07 RAILROAD CROSSING 08 RAILROAD FLARE 09 RAILROAD GATES 10 CONSTRUCTION BARRICADE 11 POLICE OFFICER 12 PARKING BARRIER 13 CRASHWALL LINES 14 RAILROAD WALL SIGNAL 15 TRAFFIC CONTROL DEVICE (OPERATIVE, MISSING, OBSCURED) 16 OTHER	DRUG TEST TYPE 1 NONE 2 TEST REFUSED 3 TEST GIVEN, CONTAMINATED SAMPLE/UNUSABLE 4 TEST GIVEN, RESULTS KNOWN 5 TEST GIVEN, RESULTS UNKNOWN 6 UNKNOWN DRUG TEST TYPE 1 NONE 2 BLOOD 3 URINE 4 OTHER DRUG TEST S.B.2. RESULT 1 NONE 2 MARIJUANA 3 COCAINE 4 CANNABIS 5 AMPHETAMINE 6 PCP 7 OTHER 8 UNKNOWN AT TIME OF REPORTING
07	12	01	02	43	01
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OHIO TRAFFIC ACCIDENT - DIAGRAM/NARRATIVE CONTINUATION

OH-2 (Rev. 1/82)

LOCAL REPORT NUMBER 10-91-327	REPORTING AGENCY STATE HIGHWAY PATROL	DATE OF ACCIDENT M 06 14 11 03
IN COUNTY OF PORTAGE	ACCIDENT LOCATION [REDACTED]	

UNIT 1

VIN-1FDAF57F8YE [REDACTED]

DAMAGE- NONE

UNIT 1 - LOAD

2001 FORD ESCAPE

RP- QP DOLL - OH

VIN-1FMYU01181K [REDACTED]

DAMAGE- VEHICLE WAS SEVERELY
BURNED FROM FRONT TO
BACK

* UNIT 1 WAS TOWING THE BURNED VEHICLE.
THE BURNED VEHICLE WAS CONNECTED
TO THE TOWING VEHICLE AT THE
REAR. THE FRONT WHEELS WERE ROTATING
ON THE ROAD DURING TRANSPORT.

* OWNER OF UNIT 1 - LOAD

[REDACTED]
RAVENNA, OH

OFFICER'S SIGNATURE

Tpm M. Dols

BADGE NO.

85

OHIO TRAFFIC CRASH WITNESS STATEMENT

OH-3 REV 1/82

LOCAL REPORT NUMBER	10-91-327	REPORTING AGENCY	STATE HIGHWAY PATROL	DATE OF CRASH	M 06 10 14 03
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FOR LOCAL USE ONLY — DO NOT SUBMIT TO THE STATE EXCEPT FOR FATAL CRASHES

I, [REDACTED] (PRINTED) HEREBY MAKE THIS VOLUNTARY STATEMENT TO

TPR. A.M. DOLES
(OFFICER'S NAME)

AT

[REDACTED]
(LOCATION)

X I [REDACTED] WAS ON A USAC CALL AT BAGLEY & PEARL TO RETRAVE A FORD ESCAPE. THE CUSTOMER WAS TOLD BY A COLLEGE TO TRY TO START THE VEHICLE. DANE GRIFFIN T. [REDACTED] TOLD HER TO SHUT OFF. I [REDACTED] THEN PROCEEDED TO TOW THE VEHICLE TO KLABER FORD. I WAS ON THE TURNPIKE BOE WHEN I [REDACTED] HEARD A BOOFF SOUND AND THEN THERE WAS A LOT OF WHITE SMOKE COMING FROM UNDER THE HOOD. I [REDACTED] STOPPED AND PULLED OVER AND UNHOOKED THE VEHICLE AND MOVED TO A SAFE DISTANCE.

Q. WERE YOU OPERATING THE FORD ESCAPE?

A. NO.

Q. WAS IT HOOKED ON TO THE TOW TRUCK?

A. YES.

Q. DID YOU NOTICE ANY SMOKE BEFORE YOU CONNECTED THE FORD ESCAPE?

A. NO.

Q. DID YOU TELL THE OWNER TO START THE FORD ESCAPE BEFORE YOU CONNECTED IT TO YOUR TRUCK?

ADDRESS
OF
WITNESSSIGNATURE
OF
WITNESS

HSY 7003

CLEVELAND, OH

OFFICER'S SIGNATURE

TPR. A.M. DOLES

OHIO TRAFFIC CRASH WITNESS STATEMENT

OH-3 REV 1/82

LOCAL REPORT NUMBER	10-91-327	REPORTING AGENCY	STATE HIGHWAY PATROL	DATE OF CRASH	M 0610 14 03
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FOR LOCAL USE ONLY — DO NOT SUBMIT TO THE STATE EXCEPT FOR FATAL CRASHES

I, [REDACTED] (PRINTED) HEREBY MAKE THIS VOLUNTARY STATEMENT TO

TPR. A.M. DOLES AT [REDACTED]
(OFFICER'S NAME)

A. NO, THE GUY WITH HER TOLD THE OWNER TO
START IT. I DID NOT.

Q. DO YOU SMOKE?

A. YES.

Q. DID YOU THROW OUT A CIGARETTE
BEFORE THE FIRE?

A. NO.

Q. WHY DID YOU TOW THIS CAR?

A. SHE WANTED (THE OWNER) THE ESCAPE TOWED
TO KLABEN FORD.

ADDRESS
OF
WITNESS [REDACTED] CLEVELAND OH [REDACTED]

SIGNATURE
OF
WITNESS [REDACTED] OFFICER'S SIGNATURE A.M. Dols

HSY 7003

-2-

OHIO TRAFFIC CRASH WITNESS STATEMENT

OH-3 REV 1/82

LOCAL REPORT NUMBER	10-91-327	REPORTING AGENCY	STATE HIGHWAY PATROL	DATE OF CRASH	M 06 10 14 03
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FOR LOCAL USE ONLY — DO NOT SUBMIT TO THE STATE EXCEPT FOR FATAL CRASHES

I, [REDACTED] (PRINTED) HEREBY MAKE THIS VOLUNTARY STATEMENT TO

TPR. A.M. DOLES

AT

(OFFICER'S NAME)

(LOCATION)

Q. DID YOU TOW THE FORD ESCAPE FROM THE
SCENE OF THE FIRE ON 6-14-03?

A. YES.

Q. HOW WAS THE VEHICLE PARKED WHEN YOU
ARRIVED AT THE SCENE?

A. OPPOSITE THE DIRECTION OF TRAFFIC.

Q. SHOULD THIS FORD ESCAPE BEEN TOWED
FROM THE REAR?

A. ABSOLUTELY NOT.

Q. WHY NOT?

A. TOWING A FRONT WHEEL DRIVE VEHICLE
FROM THE REAR CAUSES TRANSMISSION
FAILURE RESULTING ~~IN~~ FROM EXCESS
HEAT CREATED BECAUSE NO FLUID IS
BEING CIRCULATED TO COOL THE TRANS-
MISSION.

Q. COULD THIS RESULT IN FIRE?

A. YES.

Q. HOW LONG HAD YOU WORKED AS A WRECKER
DRIVER?

A. MORE THAN 4 YEARS.

ADDRESS
OF
WITNESSSIGNATURE
OF
WITNESS

HSY 7003

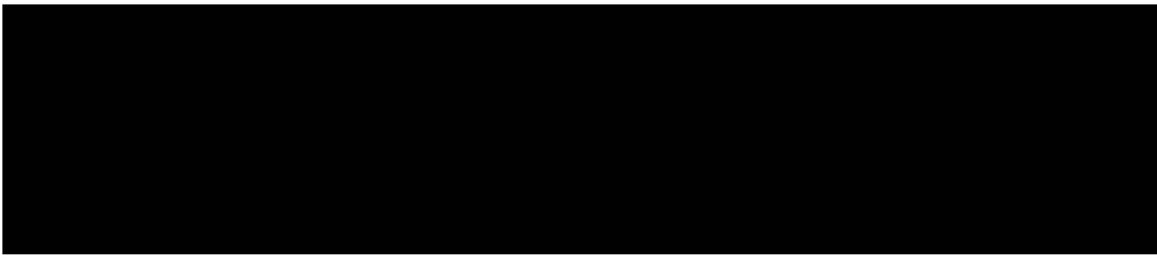
RAYMOND DILLON

OFFICER'S SIGNATURE

J.M. DOLES

9-18-77

Narrative		Diagram	
UNIT 1 WAS EASTBOUND ON OHIO TURNPIKE IN RIGHT LANE. UNIT 1 NOTICED SMOKE COMING FROM VEHICLE IT WAS TOWING. UNIT 1 STOPPED ON BERM AND DISCONNECTED FROM CAR BEING TOWED.			
NUMBER OF COLLISION OR IMPACT 1 Not Collision Between Two Vehicles in Transport 2 Head-on 3 Head-on 4 Head-to-head 5 Backward 6 Angle 7 Emergency, Same Direction 8 Emergency, Opposite Direction 9 Unknown	SCHOOL BUS RELATED 1 No 2 Yes, Directly Involved 3 Yes, Indirectly Involved 4 Unknown Work Zone Related 1 No 2 Yes 3 Unknown Type Of Work Zone 1 Lane Closure 2 Lane Shift/Overlap 3 Work On Shoulder Or Median 4 Interim/Temporary Bypass 5 Other LOCATION OF CHAIN IN WORK ZONE 1 Before First Work Zone 2 Advance Warning Area 3 Transition Area 4 Activity Area Workzone Present 1 No 2 Yes 3 Unknown	WEATHER 01 Clear 02 Cloudy 03 Fog, Smoke, Mist 04 Rain 05 Sleet, Hail (Freezing Rain Drizzle) 06 Snow 07 Severe Conditions 08 Blowing Sand/Dust, Dirt/Snow 09 Other 10 Unknown Light Conditions Primary Secondary 1 Daylight 2 Dawn 3 Dusk 4 Dark - Lighted Roadway 5 Dark - Not Lighted 6 Dark - Unknown Lighting 7 Glare 8 Other 9 Unknown	
Truck/Bus UNIT # 1 2 THE CHAIN INVOLVED ONE OR MORE OF THE FOLLOWING: A TRUCK (MOTOR VEHICLE) WITH A GVWR MORE THAN 10,000 POUNDS; OR A TRUCK (MOTOR VEHICLE) WITH A HAZARDOUS MATERIALS PLACARD; OR A BUS DESIGNED FOR AT LEAST 8 PERSONS, INCLUDING DRIVER. COMPANY (FIRM EMPLOYER) ADDRESS (Street, City, St, ZIP Code)		THE CHAIN INVOLVED ONE OR MORE OF THE FOLLOWING: A FATALITY; OR AN INJURY REQUIRING TRANSPORTATION FOR IMMEDIATE MEDICAL TREATMENT; OR AT LEAST ONE VEHICLE WAS TOWED DUE TO DRAGGING DAMAGE OR REQUIRED INTERVENEING ASSISTANCE BEFORE PROCEEDING UNDER ITS OWN POWER. COMPANY NAME	
US DOT 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100		PLACARD # 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100	
Police Action DATE CHAIN REPORTED TIME REC'D DISPATCH ARRIVED CLASSED OTHER TOTAL MINUTES 20 97		Officer's Name TPR. A.M. DOLES Rank 85 Signature SGT M.F. HILL Date Report Filed 06/19/2003	
Report Taken By 1 POLICE AGENCY 2 MOTORIST Report Taken At 1 SCENE 2 STATION 3 OTHER Supervisor 1 Yes 2 No		Top Copy - GSPB Bottom Copy - Agency	





























**Allied
Insurance**

a member of Nationwide Insurance

JANUARY 26, 2004

Allied Property & Casualty Ins Co
Des Moines Regional Office
3820 109th St Dept 2004
Des Moines, IA 50391-2004
Phone: 515-252-7288 / 800-532-1121

FORD MOTOR COMPANY

PO BOX 6248
DEARBORN MI 48126

4 FEB -3 A8 '04

Insured:
Claim Number:
Policy Number:
Date of Loss

12 /07 /03

**Your Insured:
Your Claim Number:**

Dear:

This letter serves as notification of our subrogation rights.

Based on the information available to us at this time, it has been determined that your insured was negligent in the accident on 12 /07/03 . If we issue payment for damages and/or injures sustained in this accident, we will be looking to you for reimbursement.

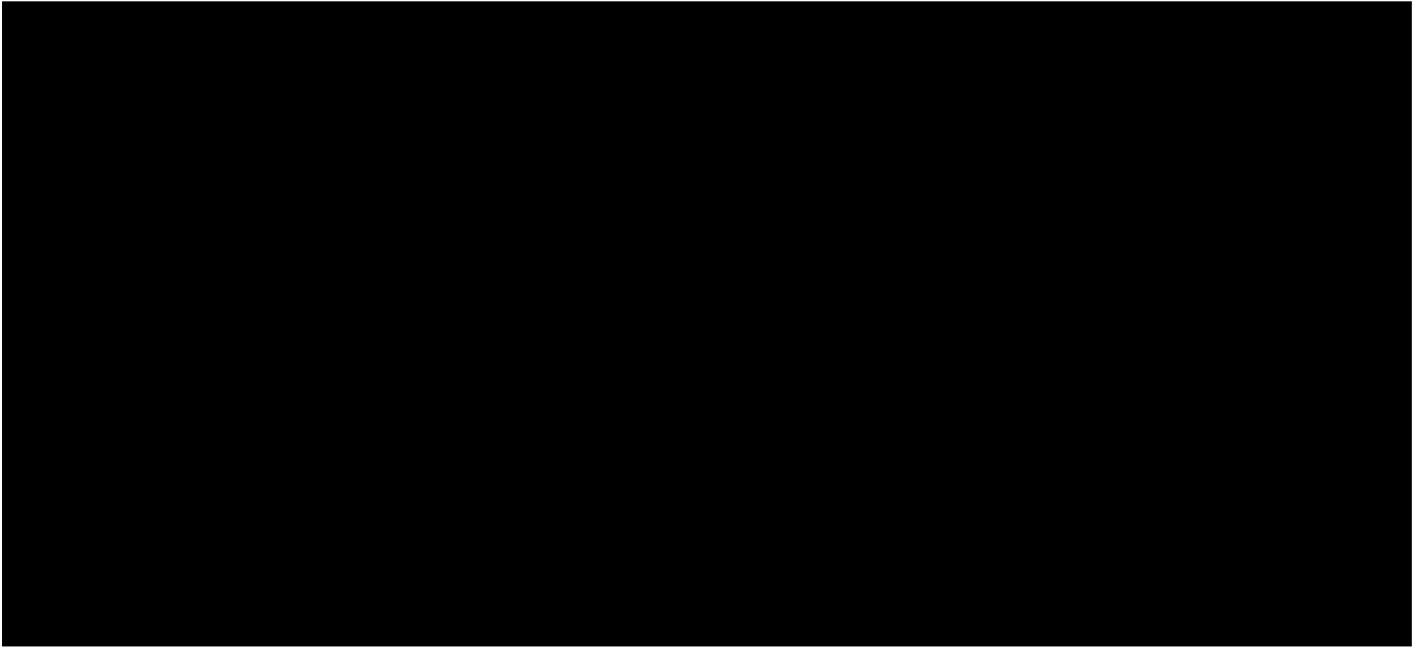
Sincerely,

JARED BLAKESTAD
Ext. 2099
Claim Representative
Allied Property & Casualty Ins Co

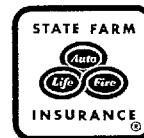
FORD MOTO RECEIVED
CLAIM

FEB 04 2004

OFFICE OF THE
GENERAL COUNSEL



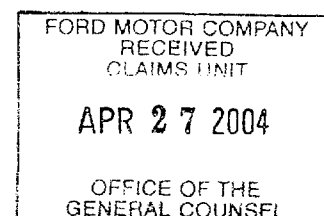
State Farm Insurance Companies®

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED****7003-1680-0001-5337-4891**

April 21, 2004

P. O. Box 9613
Winter Haven, FL 33883-9613
1-800-301-7350

FORD MOTOR COMPANY
PARKLANE TOWERS WEST
3 PARKLANE BLVD STE 400
DEARBORN MI 48126-2568



RE: Claim Number: [REDACTED]
Our Insureds: [REDACTED]
Date of Loss: April 1, 2004
Make, Model and Year of Vehicle: 2003 Ford Escape Sports Wagon
VIN of Vehicle: 1FMYU03163K [REDACTED]

To Whom It May Concern:

The identified vehicle is insured by State Farm Mutual Automobile Insurance Company. This vehicle experienced a fire loss on April 1, 2004.

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

Please contact me at 1-800-301-7350, Ext. 8552 to set up a time for your inspection.

Sincerely,

Lisa Estien
Claim Representative
1-800-301-7350 Ext. 8552
STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY

LE/030/0421006.122

4/1/04
- 103 escape
- VIN

State Farm Insurance Companies



October 20, 2004

10/20/04 P.O. Box 9613
Winter Haven, FL 33883-9613
(800) 301-7350

FORD MOTOR COMPANY
PARKLANE TOWERS WEST STE 300
THREE PARKLANE BLVD
DEARBORN, MICHIGAN 48126-2568

RE: Claim Number : [REDACTED]
Date of Loss : April 1, 2004
Our Insured : [REDACTED]
Your Reference: [REDACTED]

Dear Ms. [REDACTED]

I am writing to advise that the Cause and Origin inspection was negative and we will not subrogate this claim.

Should you have any questions, just call.

Sincerely,


Lisa Estien X8552
Claim Representative
(800) 301-7350

State Farm Mutual Automobile Insurance Company

cc: Enc. Copy of your letter dated 5/6/04



State Farm Insurance Companies



State Farm Insurance Co.
PO Box 916
Parsippany, New Jersey 07054-9

April 19, 2004

Ford Motor attn: Customer relationship center
16800 executive plaza drive
dearborne, MI 48121

STATE FARM
INSURANCE

4 APR 27 09:44

RE: Claim Number: [REDACTED]
Date of Loss: April 10, 2004
Our Insured: Ford Motor attn: Customer relationship center

Dear Sir Madam:

This is to serve as a notice that our insured's vehicle, vin # 1FMYU02151K [REDACTED] was involved in a fire loss that totalled this vehicle. Please take this letter as notice of our future Subrogation claim regarding this loss.

We further give you this opportunity to inspect this vehicle. The car is located at a Sadisco Salvage Yard in Maryland, USA. Please contact them at 301-599 6000 and reference stock # [REDACTED] to arrange an inspection time and secure location. We have made them aware of your future contact.

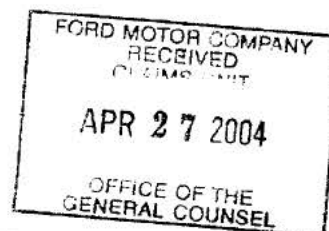
Please call me with any questions you may have.

Sincerely,

Timothy Kaczorek

Timothy Kaczorek X6815, Team 20
Claim Representative
(888) 326-0164

State Farm Mutual Automobile Insurance Company



- 4/10/04
- '01 Escape
- VIN



IN THE TERRITORIAL COURT OF THE VIRGIN ISLANDS

DIVISION OF SAINT CROIX

[REDACTED]
Plaintiff,

v.

METRO MOTORS, SC, INC. & FORD
MOTOR COMPANY

Defendant.

CIVIL NO. [REDACTED]

**ACTION FOR DAMAGES,
BREACH OF WARRANTY**

JURY TRIAL DEMANDED

COMPLAINT

COMES NOW Plaintiff, [REDACTED] by and through her undersigned counsel, **RHONDA HOSPEDALES, Esq.**, by and way of Complaint against the Defendant alleges that:

1. Plaintiff is an adult resident of St. Croix, U.S. Virgin Islands.
2. Upon information and belief, Defendant, seller METRO MOTORS, SC, INC., (hereinafter referred as "Metro Motors") is a corporation organized and existing under the law of the U.S Virgin Islands, and is and was at all times herein mentioned engaged in the business of selling Ford automobiles at its Estate Golden Rock dealership
3. Defendant manufacturer, Ford Motor Company, (herein after referred as "Ford Motor") is a Delaware Corporation with its principal place of business in Dearborn, Michigan. At all times relevant hereto, Ford Motor company was in the business of designing, manufacturing, distributing, advertising, marketing, promoting, selling and leasing motor vehicles, including the 2001 Ford Escape Model.

4. On July 2001, Plaintiff purchased from Defendant Metro Motors a new automobile manufactured by defendant manufacturer, bearing VIN No. IFMYUO1B81K ██████████ and described as follows: 2001Red 4 Door Ford Escape, XLS. Plaintiff paid in consideration therefore the sum of \$22,104.97. Defendants, in the contract of sale, marked Exhibit "A", and attached hereto and made a part of this pleading by reference, made the following warranty:

Bumper-to-Bumper Coverage begins at the warranty start date and lasts for three years or 36,000 miles, whichever occurs first. During this coverage period, authorized Ford Motor Company dealers will repair, replace, or adjust all parts on your vehicle that are defective in factory-supplied materials or workmanship.

5. Plaintiff purchased the automobile in reliance on the above warranty.

6. Upon taking delivery of the vehicle, Plaintiff's vehicle began to "cut out", on several occasions and was immediately delivered to Defendant Metro Motors, which attempted to repair the defective vehicle, but the vehicle was never repaired so that it operated properly.

7. On February 10, 2003, Plaintiff delivered her vehicle to Defendant Metro with regard to fumes that were escaping through the AC vent as well as her vehicle "cutting out". On February 13, 2003, Plaintiff retrieved the vehicle around 3:00pm. Plaintiff, later that same evening, discovered smoke coming from the hood of the vehicle.

8. Upon inspection of the vehicle, Plaintiff observed that some of the wires were burning.

9. Plaintiff's vehicle was delivered to Defendant Metro Motors on Friday, February 14, 2003. A mechanic for Metro Motors inspected the vehicle and informed the

Plaintiff that a rat bit up the wires causing the wires to catch on fire. Defendant Metro Motors thereafter refused and failed to repair the vehicle.

10. Upon information and belief, at least five people, who purchased the 2001 Ford Escape at Metro Motors and who experienced similar problems with their vehicles as the Plaintiff, were able to receive a replacement vehicle.

11. Upon information belief, early production models of the Ford Escape have suffered from fire safety related recalls. The recalls have included 1) wipers that stopped working, 2) loose steering wheels, and 3) Fuel line leakage and vehicle fires.

12. The motor vehicle purchased from Defendants by the Plaintiff was not reasonably fit and useful for the purposes warranted, for the reason that it contained a variety of hidden, latent, and complex defects, which were discoverable only through the use of the vehicle.

13. Under proper use, the motor vehicle continually failed to operate properly, required repeated repairs and adjustments, and afforded Plaintiff limited use thereof.

14. By reason of Defendant's breach of warranty, Plaintiff has suffered damages resulting from the loss in value of the automobile directly attributable to Defendants failure to repair or replace the defective vehicle.

15. Plaintiff has suffered further damage by reason of Defendants breach of warranty resulting from loss of use of the automobile, inconvenience, and time lost.

WHEREFORE, Plaintiff requests judgment as follows:

A. Awarding judgment in favor of Plaintiff and against Defendant in an amount to be proven at trial;

B. For interest thereon at the rate of four (4%) per annum from the date of judgment until paid;

C. For reasonable attorney's fees incurred by Plaintiff in prosecuting this action; and

D. Awarding "Plaintiff such other and further relief as the Court may deem equitable and just.

Respectfully Submitted

DATED: 3/18, 2004

By: Rhonda Hospedales
Rhonda Hospedales, Esq.
THE BORNIN FIRM
Commerce Place
1142 King Street, Suite 205
Christiansted, St. Croix
U.S. Virgin Islands 00820
(340) 692-6800



PROGRESSIVE

401 Corporate Woods Drive, Suite 150
Tomball, TX 77375
progressive.com

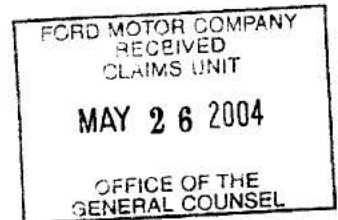
Ford Consumer Affairs
P.O. Box 6248 - MD - 3NE - B
Dearborn, MI 48126

CONSUMER AFFAIRS
SECTION

RE: Our Insured:
Vehicle:
Date of Loss:
Our Claim Number:

2002 Ford Escape
1FMYU04142K

4 MAY 25 410 09



18 May 2004

To Whom it May Concern:

Please be advised that the vehicle described above was involved in a fire that resulted in the vehicle being deemed a total loss. Results of our investigation into this claim have revealed that Ford Motor Company is liable for the damages.

Please consider this official notice of your involvement in this loss. Accordingly, you have the right to conduct an inquiry into this matter including a review of the current *cause and origin* investigation report that was completed by an independent contractor on 10 May 2004. If you wish to inspect this vehicle, please contact me at 850-475-2319 within 3 days of receipt of this letter, and we will arrange a mutually agreeable time for inspection of the vehicle.

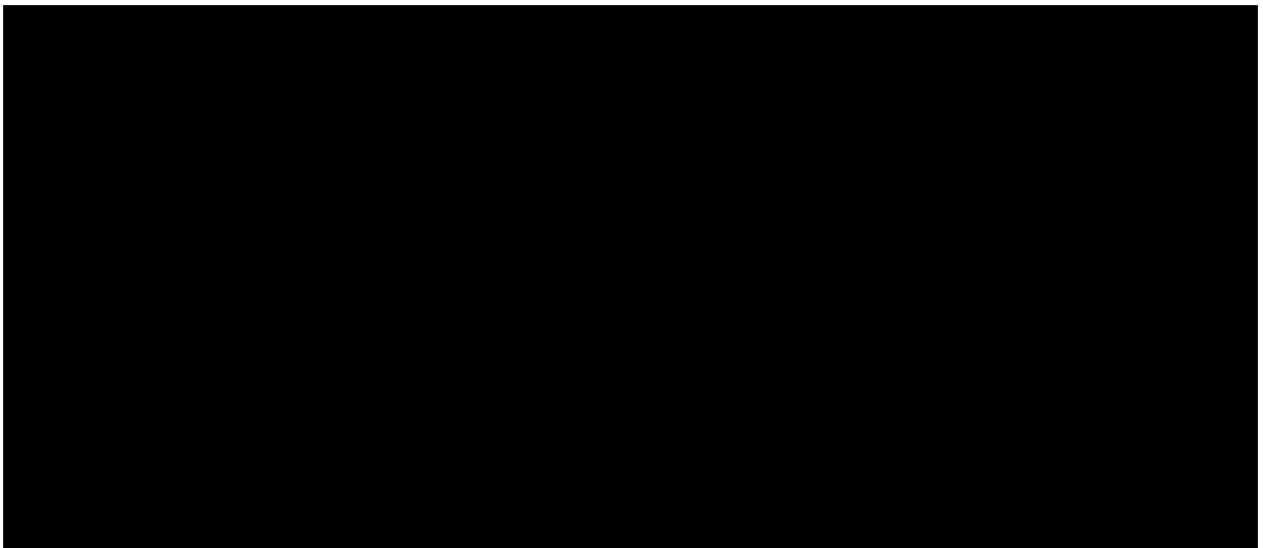
Thank you for your anticipated cooperation.

Sincerely;

A handwritten signature in black ink, appearing to read "Douglas Koontz".

Douglas Koontz
Progressive Fire and Theft Claims Investigator

PE06-048-0131LC



RECEIVED JUN - 8 2004

LAW OFFICES
STEVEN J. JACOBSON, P.A.

ATTORNEYS & COUNSELORS AT LAW

Steven J. Jacobson *
Mindy Leber Taran
Bryan Manno
J. Steven Warner
Anthony Merendino

* Also Admitted Washington, D.C.

5701 North Pine Island Road, Suite 320
Fort Lauderdale, Florida 33321

Telephone (954) 726-6626
Facsimile (954) 720-5982

June 3, 2004

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



Re: **Progressive Express Insurance Company, as Subrogee for** [REDACTED]
vs. Ford Motor Company

Progressive's Claim No. : [REDACTED]
Date of Loss : 11/12/03
Vehicle Make : Ford
Vehicle Model : Escape
Year of Vehicle : 2002
VIN : 1FMYU03192K [REDACTED]
Claim Amount : \$17,990.50 (exclusive of interest,
costs and attorney's fees)

Dear Shawn:

Please be advised that the above-captioned law firm represents [REDACTED] as insurer for [REDACTED] regarding the above-referenced claim.

Enclosed please find documentation supporting the liability of Ford Motor Company and the damages to our client regarding the above-referenced claim. You should find enclosed copies of the following documents:

1. Miami-Dade Police Report;
2. Preliminary expert report by Applications Engineering Group, Inc. ("AEGI"); and
3. Copy of Draft Number [REDACTED] in the amount of \$17,490.50 paid by Progressive.

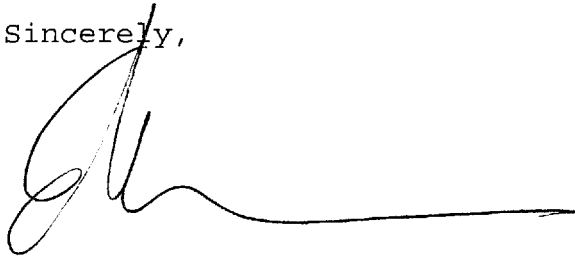
On November 12, 2003, while parked, the subject vehicle caught on fire as a result of a mechanical or electrical defect in the vehicle's engine compartment. As a consequence of the fire, the subject vehicle was destroyed.

PE06-048-0133LC

Based upon our investigation of this incident it appears that Ford Motor Company is the proximate and sole cause of the damage and therefore is responsible for any and all damages sustained by Progressive's insured's vehicle. [REDACTED] is seeking reimbursement for the \$17,990.50 (inclusive of a \$500.00 deductible) it paid to its insured, [REDACTED] as a result of the fire damage to this vehicle, as well as current accrued interest. Therefore, please remit payment in the amount of \$17,990.50, plus accrued interest, payable to Steven J. Jacobson Trust Account to the above-captioned address. Our Federal Tax ID Number is 65-0578538.

Thank you for your cooperation in this matter. If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in dark ink, appearing to be 'AM', with a long horizontal flourish extending to the right.

Anthony Merendino, Esq.

AM:am

enclosures

cc: Progressive Express Insurance Company

This is an attempt to collect on a debt and any information obtained shall be used for that purpose. In accordance with the Fair Debt Collection Practices Act, 15 USCS § 1692g (1995), unless the consumer, within thirty (30) days after receipt of the notice, disputes the validity of the debt, or any portion thereof, the debt will be assumed to be valid by the debt collector; if the consumer notifies the debt collector in writing within the thirty-day period that the debt, or any portion thereof, is disputed, the debt collector will obtain verification of the debt or a copy of a judgment against the consumer and a copy of such verification or judgment will be mailed to the consumer by the debt collector; and, upon the consumer's written request within the thirty (30) day period, the debt collector will provide the consumer with the name and address of the original creditor, if different from the current creditor.

OFFENSE-INCIDENT REPORT

Agency Code 095		Gang Related ☐		Juvenile Warn/Dismiss ☐		1. Original ☐		2. Supplement ☐	
Date of Supplement		MIAMI-DADE POLICE DEPARTMENT				Agency Report Number 607053B			
Original Day Reported WED		Date 11-22-03		Time (mil) 1711		Time Dispatched (mil) 1712		Time Completed (mil) 1845	
Incident Type 1. Felony 2. Traffic Felony		3. Misdemeanor 4. Traffic Misdemeanor		5. Ordinance 6. Other		Incident Day From WED		Date 11-22-03	
OFF/INC # 1		Type 9		Description VEHICLE FIRE		A-Attempted C-Committed ☒		Statute Violation Number 7	
OFF/INC # 2		Type		Description		A-Attempted C-Committed		Statute Violation Number	
Incident Location (Street, Apt. Number)		City MIAMI		District 6		Grid 028101		Area 1	
Business Name/Area Identifier PARKING LOT		Location Type		Forced Entry 0. N/A 1. Yes		Occupancy 0. N/A 1. Occupied		2. Unoccupied 3. Abandoned	
01. Residence-Single		06. Gas Station		11. Specialty Store		16. Storage		21. Airport	
02. Apartment/Condo		07. Liquor Sales		12. Drug Store/Hospital		17. Gov't/Public Bldg.		22. Bus/Rail Terminal	
03. Residence-Other		08. Bar/Nightclub		13. Bank/Financial Inst.		18. School/University		23. Construction Site	
04. Hotel/Motel		09. Supermarket		14. Commercial/Office Bldg.		19. Jail/Prison		24. Other Structure	
05. Convenience Store		10. Dept/Discount Store		15. Industrial/Mfg.		20. Religious Bldg.		25. Parking Lot/Garage	
26. Highway/Roadway		99. Other		27. Park/Woodlands/Field		28. Lake/Waterway		29. Motor Vehicle	
30. Other Mobile									
# OFF/INC. 01		# Victims 00		# Offenders 00		# Prem. Ent. 00		# Veh. Stolen 00	
Type Weapon 00. N/A 01. Handgun		02. Rifle 03. Shotgun 04. Firearm		05. Knife/Cutting Instrument 06. Blunt Object		07. Hands/Fist/Feet 08. Poison 09. Explosives		10. Fire/Incendiary 11. Threat/Intimidation 12. Simulated Weapon	
13. Drugs 88. Unknown 99. Other									
V/W Code V-Victim W-Witness C-Reporting Person		Victim Type 0. N/A 1. Juvenile 2. L.E. Officer 3. Adult		4. Business 5. Government 6. Church 9. Other		Race N-N/A W-White B-Black		Sex N-N/A M-Male F-Female U-Unknown	
Residence Type 0. N/A 1. City 2. County		Residence Status 0. N/A 1. Full Year 2. Part Year 3. Non-Resident		Extent of Injury 0. None 1. Minor 2. Serious 3. Fatal					
Injury Type 00. N/A 01. Gunshot 02. Stabbed		03. Laceration 04. Unconscious 05. Poss. Broken Bones 06. Poss. Internal Injury		07. Loss of Teeth 08. Burns 09. Abrasions/Bruises 99. Other		Victim Relationship To Offender 00. N/A 01. Undetermined 02. Stranger		03. Spouse 04. Ex-Spouse 05. Co-Habitant	
06. Parent 07. Brother/Sister 08. Child 09. Step-Parent		10. Step-Child 11. In-Law 12. Other Family 13. Student		14. Teacher 15. Child of Boy/Girl 16. Boy/Girl Friend		17. Friend 18. Neighbor 19. Sitter/Day Care 20. Employee		21. Employer 22. Landlord/Tenant 23. Acquaintance 99. Other Known	
OFF/INC Indicator 1. #1 2. #2		V/W Code 1. #1 2. #2		V. Type 1. #1 2. #2		Name (Last, First, Middle or Business)		Residence Phone	
Address (Street, Apt. Number)		City MIAMI		State FL		Zip		Business Phone	
Other Contact Info. (Time Available, Interpreter, etc.)		Synopsis of Involvement OWNER OF LISTED VEHICLE							
If V/W Code V, W, or P		Race		Sex		Date of Birth or Age		Res. Type Res. Status Extent of Injury Injury Type(s) Relationship Ethnicity Will victim prefer charges? Yes ☐ No ☐	
OFF/INC Indicator 1. #1 2. #2		Suspect Code S-Suspect A-Arrestee		Code #		Juvenile		Name (Last, First, Middle)	
Maiden Name		Nickname/Street Name		Place of Birth		Residence Phone			
Last Known Address (Street, Apt. Number)		City		State		Zip		Business Phone	
Occupation		Employer/School		Address		Social Security Number			
Driver's License State/Number		Immigration and Naturalization Number		Other I.D. Number		OBTS Number (Arrested)		FCIC/NCIC	
Clothing (Describe)		Scars/Marks/Tattoos (Location/Describe)		Hair Style					
Race		Sex		Date of Birth or Age		Height		Weight	
Complexion		Build		Facial Hair		Teeth		Speech/Voice	
Special Identifiers									
ZOI PARKED HIS VEHICLE AT LISTED LOCATION ON LISTED DATE AND TIME. ZOI THEN EXITED HIS VEHICLE AND WENT INSIDE A BUSINESS. WHILE INSIDE THE BUSINESS, ZOI LOOKED OUTSIDE AND SAW HIS VEHICLE ON FIRE. ENGINE #1 (LT. GAGNON / ALARM # 3168635) THEN ARRIVED AND EXTINGUISHED THE FIRE FROM ZOI'S VEHICLE (ENGINE). ENGINE #1 ADVISED THE VEHICLE FIRE WAS AN ELECTRICAL PROBLEM. ZOI ADVISED BY RESCUE TO CONTACT HIS INSURANCE. ZOI GIVEN CASE CARD. ZOI TOWED HIS VEHICLE AT HIS PERSONAL REQUEST.									
Person/Unit Notified		Time		Related Report Number(s)					
Officer(s) Reporting R. LUIS		I.D. Number 1780		Reported To ARJUNA		Unit 1323		Agency Code 095	
Officer Reviewing (if Applicable)		Clearance Type 1. Arrest 2. Exceptional 3. Unfounded 4. Open Pend.		A-Adult J-Juvenile		Date 11/14/03		Number Arrested 00	
Exception Type 1. Extradition		2. Arrest on Primary Offense Secondary Offense Without Presentation		3. Death of Offender 4. V/W Refused to Connect		Page 1		Page 1 of 12	

VEHICLE/PROPERTY REPORT

1. Original
2. Supplement

095		MIAMI-DADE POLICE DEPARTMENT		Agency Rep		iber	
of Supplement		Original Date Reported		Primary Offense Description		Victim #1 Name	
1 1 1 2 2 0 0 3		VEHICLE FIRE		NONE			
Person Code		Status Code		Damage Code		Type	
V- Victim S- Suspect M- Missing A- Arrestee E- Escapee		1. Stolen 2. Recovered 3. Stolen and Recovered 4. Suspicious		0. N/A 1. Arson 2. Criminal Mischief 3. During Other Offense		1. Auto 2. Truck/Van 3. Motorcycle 4. Camper/RV 5. Bus	
Person Code #		Veh. #		Status		Damage	
2 1 0 1		1		9		9	
Tag Reg./Doc. #		Reg. State		Reg. Year		Decal Number	
V56CIV		FL		2004			
VIN/Hull/FAA		Year		Make		Model	
1 F M Y U 0 3 1 9 2 K		2002		FORD		ESCAPE	
Condition		Insurance Company		Lien Holder		Recovery Code	
1. Window Closed 2. Locked		UNKNOWN				1. Family Residence 2. Apt. Complex 3. Housing Project 4. Commercial/Industrial	
Color (Top/Bottom)		Description (Identifying Characteristics, Noticeable Damage, Interior Color, etc.)		Style		Stolen / Recovered	
GREEN/GREEN		DAMAGED BY FIRE		SUV		1. Local / Local 2. Local / Other 3. Other / Local	
Vessel Name		Length		Hull Material		Propulsion	
Recovery Address/Geographic Indicator		Date Recovered		Value Recovered			
Recovery Loc.		Recovery Code		Original Reporting Agency		Report Number	
Method of Theft		Components Stripped		FCIC/NCIC		Location of Original Theft	
1. N/A 2. Keys 3. Hot Wire		1. N/A 2. Tires/Wheels 3. Radio/CB 4. Battery 5. Interior 6. Transmission 7. Engine Parts 8. Major Body Parts 9. Tag/Decal Stolen					
Towed By		Storage Location		FCIC/NCIC		Location of Original Theft	
Type of Theft		Status Code		Damage Code		Reason/Authority	
00. N/A 01. Burglary 02. Robbery 03. Shoplifting 04. Pocket Picking 05. Purse Snatching 06. Embezzlement 07. From Coin Oper. Machine 08. From Public Access Bldg 09. From Vehicle 10. Extortion 11. By Computer 12. Fraud 99. Other		1. Stolen 2. Recovered		0. N/A 1. Arson 2. Criminal Mischief 3. During other Offense 9. Other		1. Local / Local 2. Local / Other 3. Other / Local	
Person Code		Status Code		Property Type		Z. Miscellaneous	
V- Victim S- Suspect		1. Stolen 2. Recovered		A. Auto Accessory/Part B. Bicycle C. Camera/Photo Equipment D. Drug E. Equipment/Tool F. Food/Liquor/Consumable G. Gun H. Household Appliance/Goods I. Plant/Citrus J. Jewelry/Precious Metal K. Clothing/Fur L. Livestock M. Musical Instrument N. Construction Machinery O. Office Equipment P. Ant/Collection Q. Computer Equipment R. Radio/Stereo S. Sports Equipment T. TV/Video/VCR U. Currency/Negotiable V. Credit Card/Non-Negotiable W. Boat Motor X. Structure Y. Farm Equipment		Z. Miscellaneous	
Person Code #		Item #		Status		Damage	
2 1 0 1		1		9		9	
Serial Number		Owner Applied Number		Name		Brand	
				VEHICLE ENGINE AND BODY			
Value		Value Recovered		Date Recovered		FCIC/NCIC	
2 4 0 0 0 1 0 0							
Person Code #		Item #		Status		Damage	
Serial Number		Owner Applied Number		Name		Brand	
Value		Value Recovered		Date Recovered		FCIC/NCIC	
Person Code #		Item #		Status		Damage	
Serial Number		Owner Applied Number		Name		Brand	
Value		Value Recovered		Date Recovered		FCIC/NCIC	
Property Stolen Value		Change in Property Stolen Value		Property Recovered Value		Change in Property Recovered Value	
Activity		Type		Description		Quantity	
P. Possess S. Sell B. Buy T. Traffic R. Smuggle		D. Deliver E. Use K. Dispense/Distribute M. Manufacture/Produce/Cultivate Z. Other		A. Amphetamine B. Barbiturate C. Cocaine E. Heroin H. Hallucinogen		M. Marijuana O. Opium/Derivative P. Paraphernalia/Equipment S. Synthetic	
Activity		Type		Description		Quantity	
Activity		Type		Description		Quantity	
Activity		Type		Description		Quantity	
Officer(s) Reporting		ID Number(s)/Locator Code		Unit		Date	
R. LUIS		4796133		L373		11-12-03	
Officer Reviewing (If Applicable)		Routed To		Referred To		Assigned To	
Case Status		Clearance Type		A-Adult J-Juvenile		Jail Number	
1. Arrest 2. Exceptional 3. Unfounded 4. Open Pend.		1. Arrest 2. Exceptional 3. Unfounded 4. Open Pend.					
Exception Type		Arrest on Primary Offense		Death of Offender		Prosecution Declined	
1. Extradition		2. Arrest on Primary Offense		3. Death of Offender		5. Prosecution Declined	
OBTS Number		Page		Page			
		7		17			

January 22, 2004

Progressive Insurance Company
Attention: Ms. Lynda Hoffman
8200 Northwest 33rd Street, Suite 100
Miami, Florida 33122

Re: Schulman Ford Escape Fire Inspection
Client File: [REDACTED]
AEGI File: [REDACTED]

Dear Ms. Hoffman,

On December 4, 2003, Applications Engineering Group, Inc., (AEGI), was requested to perform a preliminary inspection of a 2002 Ford Escape (Ford) which was involved in a fire on November 12, 2003. It was reported that the owner, [REDACTED] drove the vehicle a short distance and then parked it. He returned a few minutes later and discovered the vehicle on fire. There were no reports of any prior problems. Mr. Dennis Kerr of Ward & Whitmore Universal Fire Consultants, Inc. identified the origin of the fire as the left rear area of the engine compartment. AEGI was specifically requested to inspect the Ford and determine if any electrical or mechanical components had malfunctioned, if any defects existed and/or if any service or repairs had been made that may have caused the fire.

On January 15, 2004, AEGI performed a preliminary inspection of the Ford at Sadisco® in Miami, Florida. The vehicle was identified as a 2002 Ford Escape, VIN 1FMYU03192K [REDACTED] (Photograph 1). The exterior exhibited fire/heat damage on the front end, hood and left front fender (Photographs 2, 3 and 4). The interior exhibited minor smoke damage with no visible heat damage.

The underside of the hood exhibited the greatest heat damage above the left rear area of the engine compartment (Photograph 5). In the engine compartment, the greatest heat damage was observed in the area to the left and rear of the engine (Photographs 6, 7 and 8). Damaged components in this area included the air intake duct, several electrical conductors and sensors, the fuel line and the brake fluid reservoir. Heat damage extended throughout the engine compartment.

Conductors, connectors and small electrical components located on the left side of the engine compartment were visually inspected. All exhibited heat damage with no visible evidence of an electrical malfunction found. The battery exhibited heat damage that was consistent with damage due to external heating (Photograph 9). The exposed lengths of

the battery cables exhibited no visible evidence of an electrical malfunction. The underhood fuse block (Power Distribution Center) exhibited relatively uniform heat damage throughout and exhibited no visible evidence of an electrical malfunction (Photograph 10). The cover of the power distribution center had melted onto the components, and therefore, the condition of the fuses could not be determined

The flexible section of the fuel line, which connects the metal fuel lines had melted/burned away (Photographs 11 and 12). The fuel line connection on the engine side appeared to be provided with the factory retaining clip (Photograph 13). The fuel line connection components on the supply side had melted/burned away and, therefore, the components used for this connection could not be confirmed. The vacuum line attached to the fuel pressure regulator had also melted/burned away (Photograph 14). The fuel pressure regulator was not disassembled to inspect the condition of the diaphragm. The factory configuration of the flexible fuel line connections were documented on a 2004 Ford Escape (Photographs 15 and 16).

The plastic brake fluid reservoir had melted off of the master cylinder.

Inspection of the interior fuse block revealed that the 5 amp fuse identified as 'ABS/ASC' and the 15 amp fuse identified as the 'STOP' were found in an open (nonconducting) condition and the remaining fuses were found in a conducting condition (Photographs 17 and 18).

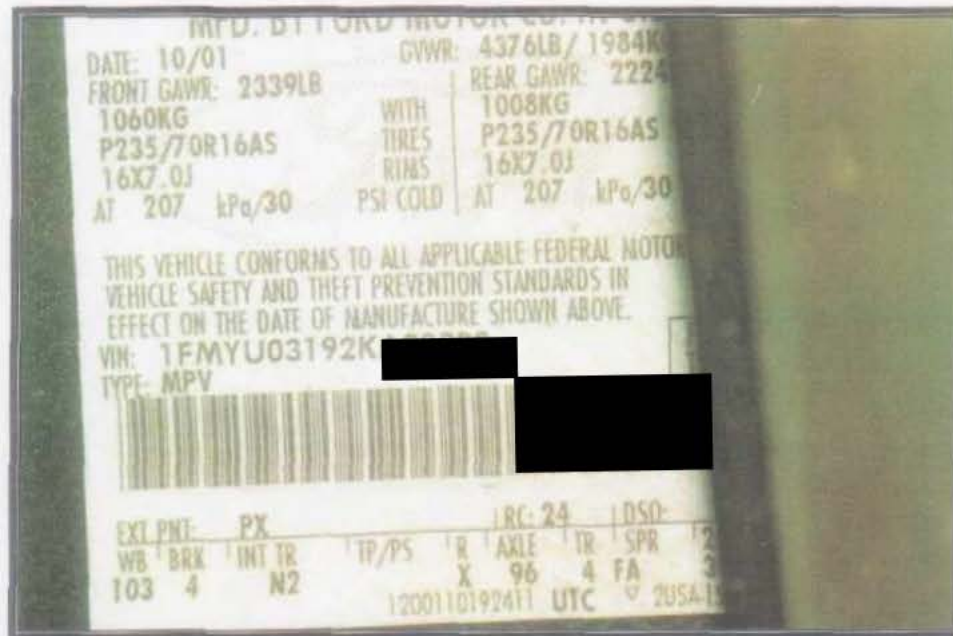
A search was made with the National Highway Traffic and Safety Administration (NHTSA) for recalls, defect investigations, technical service bulletins (TSB) or consumer complaints for a 2002 Ford Escape. No applicable recalls or consumer complaints were listed.

It was reported that Jiffy Lube performed the oil changes on this vehicle. It is recommended that the service history be obtained for the Jiffy Lube services that were performed in order to determine if any work performed by Jiffy Lube contributed or caused this fire.

A fire occurring in a vehicle while it is parked is not an expected occurrence. Due to the heat damage in the area of identified fire origin, a mechanical or an electrical failure could not be ruled out by the visual inspection. Potential causes of this fire include a fluid leaking or spraying onto heated surfaces of the engine and/or associated parts or an electrical malfunction in an energized circuit. Without regard to possible external events, a mechanical or electrical defect or malfunction most likely occurred in the left rear area of the engine compartment resulting in this fire.

The inspection was conducted in accordance with ASTM E860-97, "Standard Practice For Examining And Testing Items That Are Or May Become Involved In Litigation".

AEGI



Photograph 1
(VIN plate)



Photograph 2
(Exterior view of left front corner)

AEGL

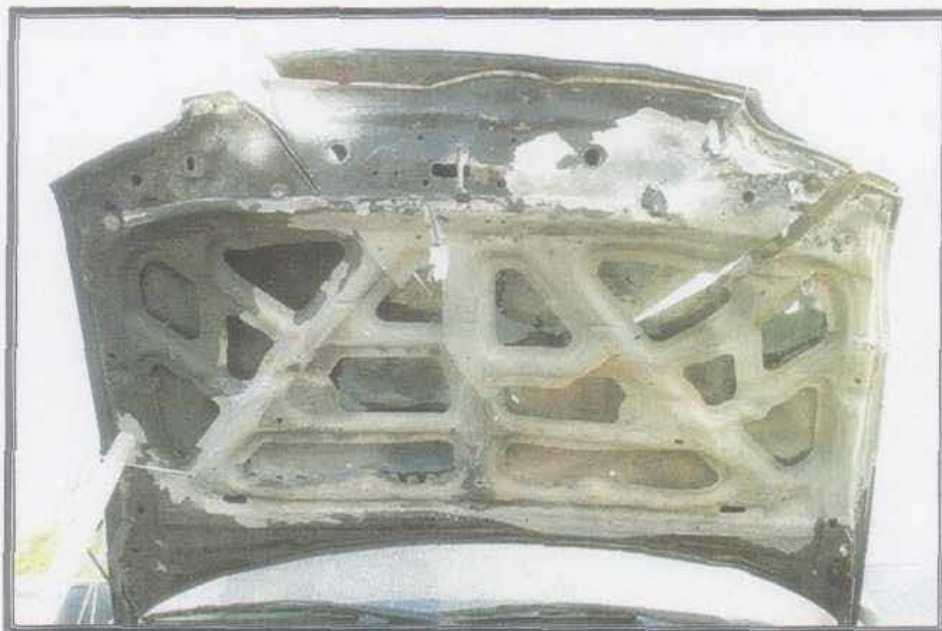


Photograph 3
(Exterior view of right front corner)



Photograph 4
(Exterior view of hood and front end)

AEGL



Photograph 5
(Underside of hood)

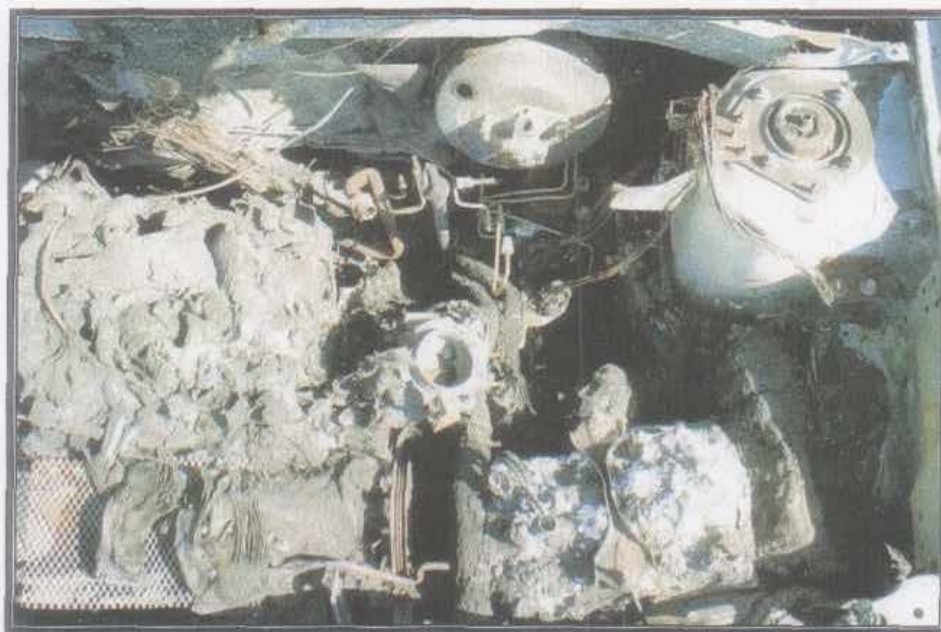


Photograph 6
(Overall view of engine compartment with fallen hood liner in place)

AEGL



Photograph 7
(Overall view of engine compartment with fallen hood liner removed)



Photograph 8
(Downward view of area of greatest heat damage)

AEGI



Photograph 9
(Heat damage to battery)



Photograph 10
(Heat damage to underhood fuse box (Power Distribution Panel))

AEGI



Photograph 11
(Flexible fuel line connection point on engine side and fuel pressure regulator)



Photograph 12
(Flexible fuel line connection point on supply side)

AEGL

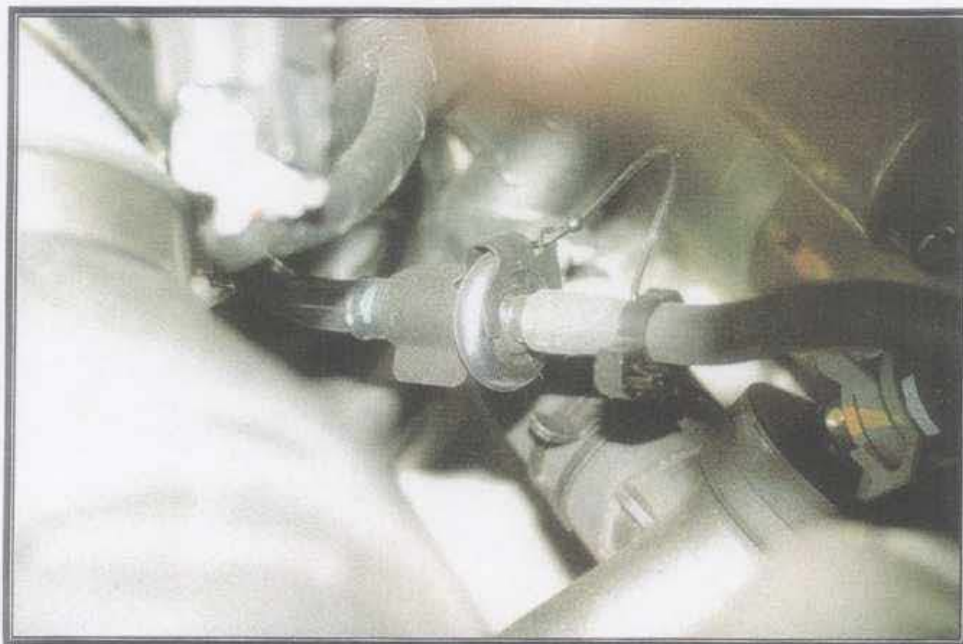


Photograph 13
(Closer view of flexible fuel line connection point on engine side)

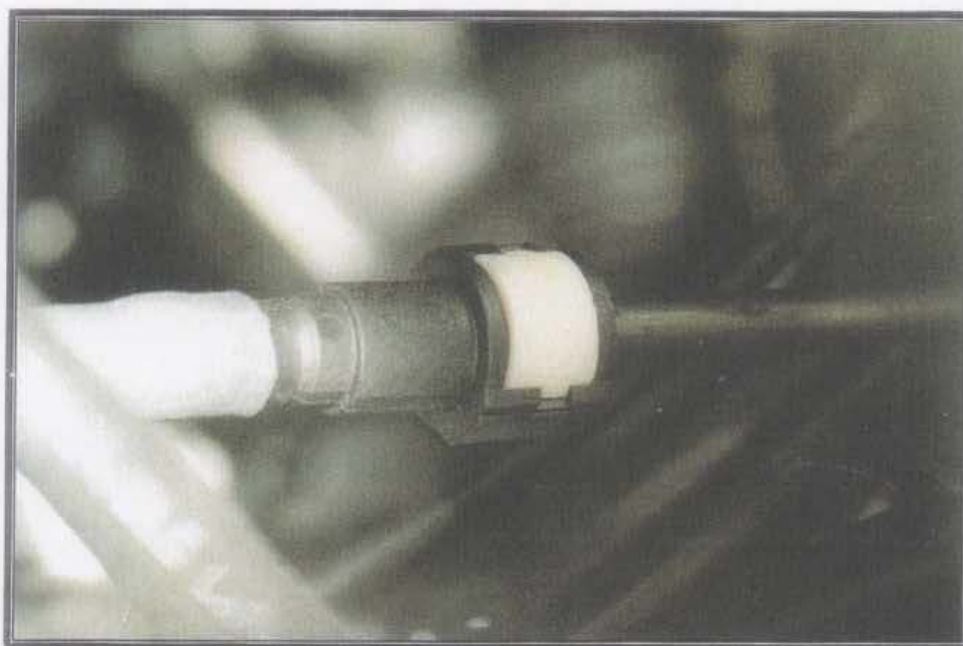


Photograph 14
(Fuel pressure regulator)

AEGI

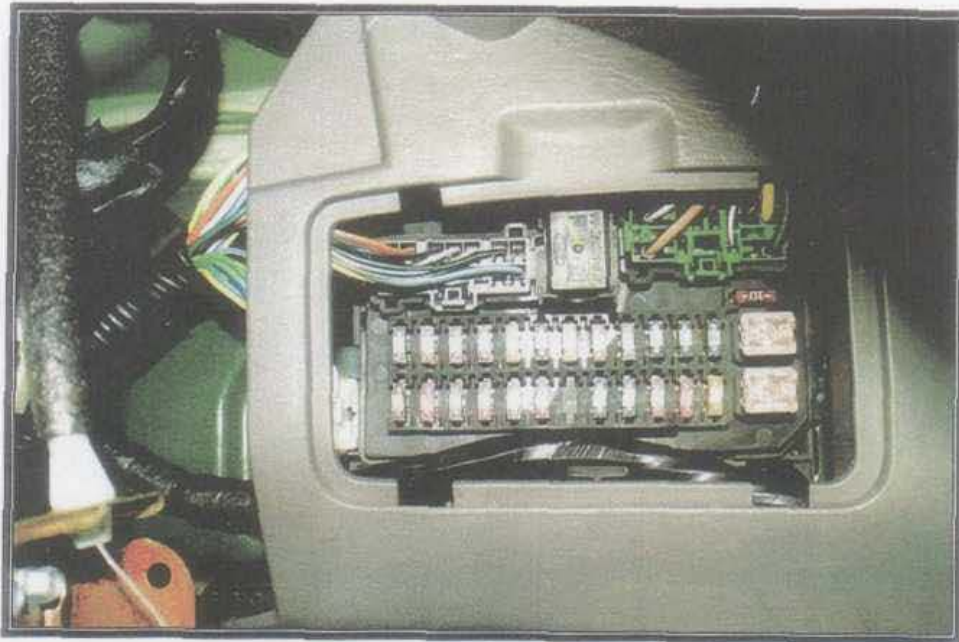


Photograph 15
(Original configuration of flexible fuel line connection on engine side)

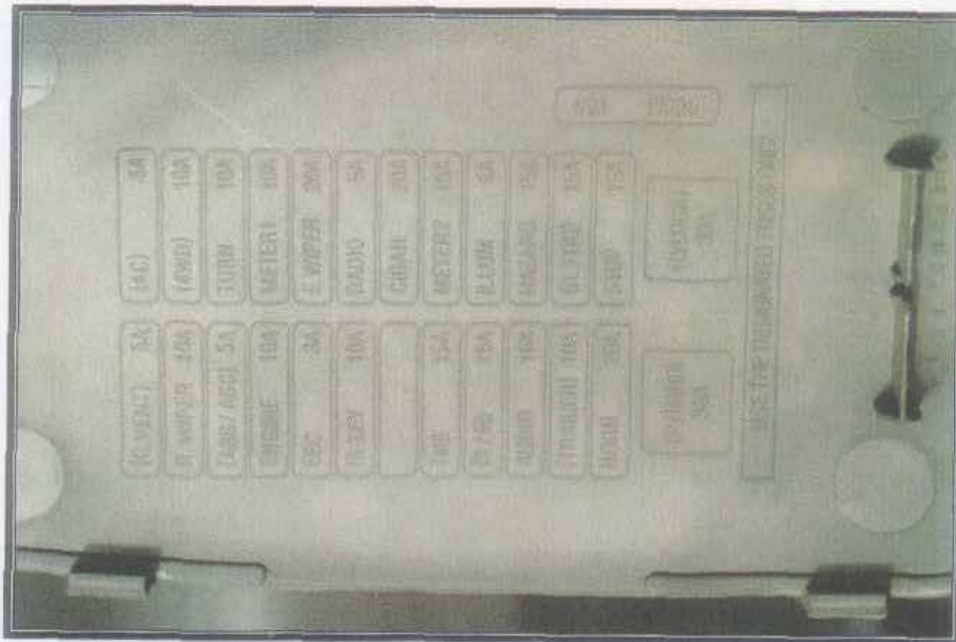


Photograph 16
(Original configuration of flexible fuel line connection on supply side)

AEGI

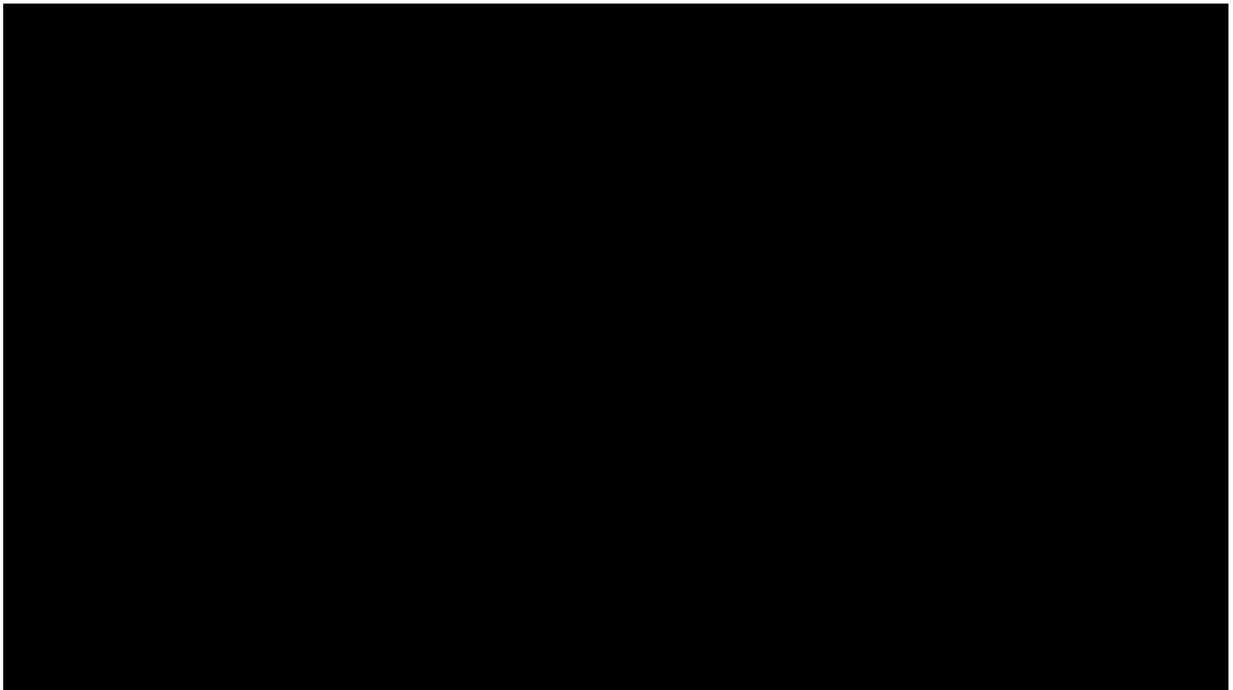


Photograph 17
(Interior fuse panel)



Photograph 18
(Identification of interior fuses)

AEGI



JUL 12 2004

6/28
Wonne



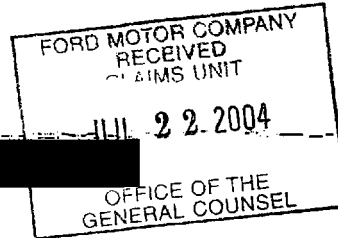
1001 E Hector Street * Suite 300 * Conshohocken, PA 19428

Ford Motor Company
Consumer Affairs
Dearborn, MI 48126

New

June 22, 2004

OUR INSURED: [REDACTED]
OUR CLAIM NUMBER: [REDACTED]
DATE OF LOSS: 06-19-2004



04 JUN 25 P2:01
FORD CREDIT
LEGAL OFFICE

To Whom It May Concern:

Please be advised that I represent [REDACTED] The above vehicle was involved in a vehicle fire, which resulted from alleged engine compartment. The incident occurred in Olyphant, PA on the above date.

In order to determine the cause of the problem, including a determination as to whether any defect in the vehicle was in existence at the time of the fire, an inspection and testing of the vehicle will be conducted by Crawford & Company, and authorized representative of the above. The inspection will take place at Copart Auto Salvage yard in Pennsburg, PA in ten days.

As you have an interest in this matter, from both a safety precaution standpoint and as potential defendants in litigation, you are invited to have an expert attend and participate in the inspection and testing procedures.

To coordinate the inspection date and time, please contact Crawford and Company at (800) 315-0383. Should you have any questions pertaining to this matter, or wish to discuss the same in further detail, you may contact the undersigned at 877-838-9816 ext. 2823.

Any person who knowingly and with intent to defraud any insurance company or other person files an application for insurance or statement of claim containing any materially false information or conceals for the purpose of misleading information concerning any fact material thereto commits a fraudulent insurance act, which is a crime and subjects such a person to criminal and civil penalties.

I would like to caution that should your expert fail to appear at the inspection, you will forfeit any right to subsequently claim prejudice/spoliation under Nally Vs Volkswagen of America, Inc., 405 Mass. 191 (1989).

NATIONWIDE MUTUAL INSURANCE COMPANY
Michael Krause (PA-20-CKEN)

Any person who knowingly and with intent to defraud any insurance company or other person files an application for insurance or statement of claim containing any materially false information or conceals for the purpose of misleading information concerning any fact material thereto commits a fraudulent insurance act, which is a crime and subjects such a person to criminal and civil penalties.

(EC)
- 6/19/04
- Olyphant, PA

OLYPHANT FIRE DEPARTMENT

NATIONWIDE INSURANCE:

**FOR A COMPLETE FIRE REPORT THERE IS A CHARGE
OF \$ 25.00 DOLLARS INCLUDED IS A FIRE CHIEFS REPORT FOR
THE INCIDENT AT:**


OLYPHANT PA

TYPE OF ALARM : VEHICLE

PLEASE MAKE CHECK PAYABLE TO:

**OLYPHANT FIRE DEPARTMENT C/O
DAVID TULLY
201 SANDERSON AVE.
OLYPHANT, PA 18447**

**THANK YOU,
CHIEF TULLY**

**FIRE CHIEFS REPORT FOR STATION 26
OLYPHANT FIRE DEPARTMENT****ALARM: 46 DATE: JUNE 20, 2004 TIME: 2:30 AM PM****NAME:** [REDACTED] **INSURANCE: NATIONWIDE**
OLYPHANT, PA [REDACTED]**ALARM TYPE:****AUTOMATIC****STRUCTURE****CAR FIRE X****MVA****BRUSH****MUTUAL AID****OTHER****COMPANIES RESPONDING:****E 261 X E 268****E 262 X E 26****E 264 X R 26****B 26 A 269****MUTUAL COMPANIES:**
_____**STRUCTURE TYPE: COMMERCIAL RESIDENTIAL HI-RISE**
CHURCH SCHOOL OTHER**FIRE MARSHALL NOTIFIED: YES X NO TIME: 11:30 AM**

REMARKS: THE OLYPHANT FIRE DEPARTMENT WAS DISPATCHED TO THE ABOVE LOCATION FOR A VEHICLE FIRE. UPON ARRIVAL WE FOUND AN ENGINE COMPARTMENT FIRE. THE FIRST DUE ENGINE COMPANY STRETCHED A 1 3/4 HAND LINE TO ESTINGUISH THE FIRE. AS THE OWNER CHECKED THE VEHICLE HE FOUND THAT NO PESONAL POSSESSIONS HAD BEEN TAKEN FROM THE VEHICLE. A CALL WAS PUT IN TO THE FIRE MARSHALL AT 11:30 AM, HE RETURNED MY CALL ON TUESDAY AND MENTIONED HE WOULD TAKE A LOOK AT THE VEHICLE THAT MORNING. AS OF JUNE 23 TPR. ADDRESS FROM THE DUNMORE BARRICKS HAS NOT GOT BACK TO ME.

CHIEF: *David Lucy***DATE:** *June 23, 2004*

Insured: [REDACTED]
File No.: [REDACTED]

1

ASSIGNMENT:

Received from: Michael Krause, Nationwide Insurance
Instructions: Conduct an Origin and Cause examination of a vehicle fire after waiting ten days to allow time for manufacturer to respond to notice

Received on: Tuesday June 22, 2004 2:43 PM
Commenced on: Tuesday July 6, 2004 7:20 AM
Completed on: Tuesday July 6, 2004 5:45 PM

Verbal report on: Tuesday July 6, 2004 1:30 PM and 3:50 PM
Verbal report to: Michael Krause of Nationwide Insurance Company

RISK:

Make	2002 Ford	Model	Escape
VIN	1FMYU04192K [REDACTED]	License Plate	None

ORIGIN AND CAUSE SUMMARY:

Based on the information presently available, the area of origin for this fire was in the front left side of the engine compartment.

The fire spread to combustible materials (hoses, belts, and wiring insulation) within the engine compartment and to the upper left portion of the dash in the passenger compartment before the fire was extinguished.

The ignition source for this fire was the vehicle's electrical system at the fuse panel located at the front left side of the engine compartment.

The first material ignited was wiring insulation.

The event that brought the ignition source and the first material ignited together was failure of wiring insulation at the fuse panel.

Insured: [REDACTED]
File No.: [REDACTED]

2

BACKGROUND:

[REDACTED] reported this vehicle was purchased used, along with an extended warranty, from Hertz Car Sales on Old Forge Road, Moosic, PA, approximately 14 months before the fire. [REDACTED] reported at the time of purchase the vehicle recorded approximately 27,300 miles, and that at the time of the fire the vehicle recorded approximately 31,000 miles.

[REDACTED] reported Hertz Car Sales had replaced the front bumper prior to purchasing this vehicle. [REDACTED] reported this vehicle was repaired by Given's Ford, Dickson City, PA, in May 2004, for a recall associated with engine cutout at highway speeds, and that Given's Ford recalibrated the engine computer.

[REDACTED] reported that Laser Lube, Dunmore, PA, last changed the oil in October 2003, and that the Given's Ford was last under the hood before the fire.

[REDACTED] reported her daughter smokes when using this vehicle.

[REDACTED] reported she last used this vehicle the day before the fire to pick up her son and that she returned home at 11:30 PM. [REDACTED] reported she parked the vehicle next to her residence with all windows closed, but she did not activate the factory installed alarm system nor did she lock the vehicle. [REDACTED] reported no recurring problems with the vehicle prior to the fire and that the vehicle ran normally with no unusual odors or noises.

[REDACTED] reported an unidentified man, tall, thin, wearing a blue sweatshirt, passing her house discovered the fire at approximately 3:00 a.m., and that the unidentified man notified the fire department. [REDACTED] reported this man alerted her family to the fire by pounding on her door. [REDACTED] reported the fire department arrived within approximately five minutes.

[REDACTED] a volunteer fireman, reported his wife returned home and parked the vehicle at approximately 11 p.m. [REDACTED] reported he first observed flames coming out the front wheel wells and around the hood of the vehicle after he was awakened by the unidentified man pounding on the door. [REDACTED] reported he went outside and used a garden hose on the outside of the vehicle before opening the hood, whereupon he observed a fully involved engine compartment fire.

Insured: [REDACTED]
File No.: [REDACTED]

3

VEHICLE EXAMINATION:

The vehicle was examined at the Copart Salvage Yard, Pennsburg, PA. The unit was stored under stock # [REDACTED]. The vehicle is a 2002 Ford Escape SUV, VIN #1FMYU04192K [REDACTED].

EXTERIOR:

This vehicle is a four-door SUV. The examination of the vehicle started with the exterior, starting at the front of the vehicle and going around the vehicle in a counter-clockwise direction. The unburned portions of the vehicle were in excellent condition.

The hood, lift gate, and all four doors were closed. The front of the vehicle showed heavy fire damage to the hood, left fender, left side of the front bumper, and the upper grill. The hood was distorted by heat. The paint was burned away from the hood and most of the left fender. The left front door, left rear door, left quarter panel, rear bumper, right quarter panel, right rear door, and right front door were intact with neither observed fire damage nor observed collision damage. The rear lift gate had no observed fire damage but had a dent approximately 1 inch by 1.5 inch and 8/32 inch deep above the left taillight. The left taillight was partially broken. The right fender was fire damaged only at the upper right corner. The roof and pillars were intact, with some heat discoloration on the pillars next to the hood.

The windshield was cracked and broken from the fire. The left front, left rear, rear, right rear, and right front glass were intact. All windows were closed. This vehicle is equipped with electric windows.

The left front door lock was intact. The right front door lock was not accessible from the outside of the vehicle. No exterior trunk lock was observed.

All 4 tires mounted on the vehicle were Continental brand on alloy wheels. The left front tire had 4/32 inch tread depth. The left rear tire had 6/32 inch tread depth. The right rear tire had 5/32 inch tread depth. The right front tire had 2/32 inch tread depth. The centers of the wheels were capped and the wheel lugs were not observed.

INTERIOR:

The interior of the vehicle was fire damaged at and above the left side of the dash. The upper left side of the dash was partly consumed. Portions of a wiring harness in the upper left portion of the dash were intact. Insulation was burned off portions of the brake light switch wire. The damaged wires in the dash were examined and no evidence of electrical shorts or faults was observed. The radio and speakers were intact. The ignition was intact and in the off position. The key was not in the ignition but was hanging by a cord from the steering column. The steering column was intact and locked.

The front seat was intact with some melting on the left side from drop down debris from the headliner or visor. The rear seat was intact. The driver's side and passenger's side air bags were intact.

The floor and carpet were intact. There was some drop down damage to the carpet in front of the driver's seat.

The odometer was destroyed and the actual vehicle mileage at the time of this fire could not be determined. An oil change sticker on the windshield was imprinted with "Laser Lube", was dated 1/10/04 and marked 32,808 miles.

Personal items observed in the passenger area included a pen, two air fresheners, a Father's Day card, a deck of cards, a child's toy, a plastic butane cigarette lighter, a Pennsylvania map, Burger King ketchup packets, and chewing gum.

Other than the fire damage to the area around the left side of the dash, the interior of the vehicle was not burned. The fire damage to the left side of the dash is consistent with heat entering the interior of the vehicle from the outside. As a result, the interior of the vehicle was eliminated as the area of origin of this fire.

TRUNK AREA:

This vehicle is an SUV with a rear cargo area. Two child's toys were observed in the cargo area. The spare tire and tire changing equipment were intact. The cargo area received some smoke damage but was intact.

ENGINE COMPARTMENT:

The engine compartment of the vehicle was examined and it was found to contain a V-6 engine mounted from left to right. Portions of the top of the engine were melted. The battery, mounted in the front left side of the engine compartment, was partly consumed. The radiator was partly consumed and the coolant level was low. The upper radiator hose was partly consumed and the lower radiator hose was intact. The belt on the right side of the engine was partly consumed, and the belt on the left side of the engine was fully consumed.

The engine oil was between the minimum and maximum levels. The brake fluid reservoir was consumed by the fire. The transmission fluid level was full. No fluid leakage was observed.

A wiring harness located in the wheel well area above the left front tire was fire damaged and all insulation was burned. This wiring was examined and no evidence of shorts or faults was observed.

Rubber hoses at the upper right front of the engine compartment were only partly consumed by the fire. Insulation was completely burned off most wires in the engine compartment except for a harness located at the right rear side that retained some charred insulation. The engine compartment wiring harnesses were examined and no evidence of shorts or faults was observed except at the location of the fuse panel.

The area of greatest heat damage to the engine compartment wires and wiring harnesses was observed to be at the left front, to the left of the battery, at the location of the fuse panel. The fuse panel was connected directly to the battery and would remain energized even when the vehicle is off and parked. What appeared to be the left front portion of the fuse panel was broken off and the bottom side showed evidence of electrical shorts and faults. Electrical shorts produce enough heat to ignite wiring insulation and plastic materials. Due to the severe damage to the fuse panel it was not possible to determine which electrical circuits shorted without destroying what remained.

VEHICLE UNDERCARRIAGE:

The undercarriage of the vehicle was examined and there was some fire damage to the front right side. Paint remained on the remainder of the underside of the vehicle. The fuel tank, fuel filler, filler cap, transmission, and oil pan were intact.

Insured:
File No.:

6

ENCLOSURES:

- 1 Photographs - Mounted = 32
- 2 Photographs – Unmounted = 29
- 3 Photograph Negatives

Insured:
File No.:

7

PHOTO LOG
Location / Depicting

No.

- 1 View of the front of the vehicle
- 2 View of the driver's side of vehicle
- 3 View of the rear of the vehicle
- 4 View of the passenger's side of the vehicle
- 5 View of the vehicle's VIN plate through the broken windshield
- 6 View of the rear cargo area
- 7 View of the vehicle's interior and the windshield from the rear cargo area
- 8 View of the spare tire and jack
- 9 View of the vehicle information label
- 10 View of the driver's side of vehicle with doors open
- 11 View of the interior from the passenger's door
- 12 View of the interior from the driver's door
- 13 View of the upper left side of the dash and the steering column
- 14 View of the driver's seat
- 15 View of the wiring harness above the left front wheel
- 16 View of the underside of the hood
- 17 View of the engine compartment from the front, showing the battery and fuse panel at the left front of the engine compartment, which is the lower right in this view
- 18 View of the engine compartment from the left front
- 19 View of the engine compartment from the right front
- 20 View of the left front portion of the engine compartment from the left
- 21 View of the left front portion of the engine compartment from the right, showing heavily oxidized steel below and to the right of the wiring harness that is routed above the left front wheel
- 22 View of the wiring harness that is routed above the left front wheel, where it exits the engine compartment, showing heavily oxidized steel below and to the left of the wiring harness
- 23 View of the remains of the fuse panel, from the right side
- 24 View of the broken off front portion of the fuse panel, showing evidence of electrical shorts
- 25 View of the broken off front portion of the fuse panel
- 26 View of the broken off front portion of the fuse panel
- 27 View of the broken off front portion of the fuse panel

Insured:



8

File No.:



- 28 View of the underside of the fuse panel showing evidence of electrical shorts
- 29 View of the undercarriage of the vehicle, from the rear, showing the spare tire well and the rear portions of the drivetrain
- 30 View of the undercarriage of the vehicle, from the right front, showing the left front
- 31 View of the undercarriage of the vehicle, from the left front, showing the right front
- 32 View of the undercarriage of the vehicle, from the left front, showing the left front

Photo Mounting Sheet



1.



2.

Photo Mounting Sheet



3.



4.

Photo Mounting Sheet



Photo Mounting Sheet



7.



8.

File Identification: [REDACTED]

Insured: [REDACTED]

MFD. BY FORD MOTOR CO. IN U.S.A.

DATE: 03/02 GVWR: 4528LB / 2053KG

FRONT GAWR: 2398LB REAR GAWR: 2319LB

1087KG WITH 1051KG WITH

P235/70R16AS TIRES P235/70R16AS TIRES

16X7.0J RIMS 16X7.0J RIMS

AT 207 kPa/30 PSI COLD AT 207 kPa/30 PSI COLD

THIS VEHICLE CONFORMS TO ALL APPLICABLE FEDERAL MOTOR
VEHICLE SAFETY AND THEFT PREVENTION STANDARDS IN
EFFECT ON THE DATE OF MANUFACTURE SHOWN ABOVE.

VIN: 1FMYU04192K [REDACTED] F0000
TYPE: MPV T0000

[REDACTED]

EXT PNT:	BZ	RC:	16	DSQ:	
WB BRK	INT TR	TP/PS	R AXLE	TR	SPR
103	4	22	X	69	4 GC
1200203150008			UTC		2USA1520472AA

9.



10.

Photo Mounting Sheet



11.



12.

Photo Mounting Sheet



13.



14.

Photo Mounting Sheet



15.



16.

Photo Mounting Sheet



17.



18.

Photo Mounting Sheet



19.



20.

Photo Mounting Sheet



21.



22.

Photo Mounting Sheet



23.



24.

Photo Mounting Sheet



25.



26.

Photo Mounting Sheet



27.



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Photo Mounting Sheet



29.



30.

Photo Mounting Sheet



31.



32.



State Farm Insurance Companies®

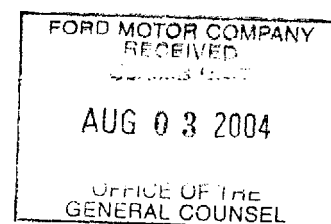


July 30, 2004

Tempe Operations Center
2700 South Sunland Drive
P. O. Box 22105
Tempe, AZ 85285-2105
Phone #: 1 (888) 759-9034
Fax #: 1 (888) 759-9032

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

RE: Claim #: [REDACTED]
Our Insured: [REDACTED]
Date of Loss: July 26, 2004
2001 Ford Escape sportwagon
VIN #1FMYU04151K [REDACTED]



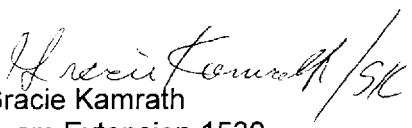
Dear Ford Motor Company:

This State Farm® insured vehicle was involved in an engine loss/fire. We are pending a settlement with our insured as the vehicle has been declared a total loss.

Our investigation revealed the cause of loss was due to a possible fuel leakage, resulting as an engine fire to our insured vehicle.

Please consider this letter as our demand for reimbursement of \$ (unknown at this time).

Sincerely,


Gracie Kamrath
Team Extension 1530
Phone: 1 (888) 759-9034
STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY

412/0729018r1



ISSUE LIST

Last Handling Date/ Issue Status	Name/ Reason Desc	Vin/ Case No.	Model Year and Vehicle Line	Issue Type
4/30/2004 CLOSED	[REDACTED] CI - BBB	1FMYU93143K [REDACTED] 1669311114	2003 ESCAPE	02
4/26/2004 CLOSED	[REDACTED] LEGAL - ACCIDENT / FIRE	1FMYU93143K [REDACTED] 1669311114	2003 ESCAPE	07
4/20/2004 CLOSED	[REDACTED] RECALL/ONP - VEHICLE INVOLVEMENT	1FMYU93143K [REDACTED] 1669311114	2003 ESCAPE	02

All Action Details for Issue

[Print](#)

VIN: 1FMYU93143K [REDACTED] Year: 2003
Name: [REDACTED] Owner Status: Original
Symptom Desc: ENGINE GENERAL CONCERN MECH FAILURE
Reason Desc: CI - BBB
Issue Type: 02 INFORMATION Issue Status: CLOSED

Model: ESCAPE

Case: [REDACTED]

WSD: 2002-09-30

Primary Phone: [REDACTED]

Secondary Phone: [REDACTED]

Action: CREATE CLOSED INFO - 3RD PARTY AGENCY

Dealer: 05240 DICK SMITHFORD, INC.

Origin Desc: CONSUMER AFFAIRS - CONSUMER INTERVENTION

Odometer: 25000 MI

Comm Type: EMAIL

Analyst Name: JACKSON,CELESTE (C.)

Analyst: CJACKS84

Action Date: 04/30/2004

Action Time:
09.09.55.227

Action Data: Yes

Comments SR. CI ANALYST COMMENTS: CUSTOMER STATES CONCERNS AS ENGINE FIRE CAUSED VEHICLE TO BE TOTALED BY INSURANCE COMPANY. CUSTOMER SEEKS: REFUND OF EQUITY AND DIFFERENCE INSURANCE DIDN'T COVER. **CI SENT CLOSING RESPONSE LETTER TO REFERRING PARTY; LITIGATION PREVENTION INVOLVED.

Data Element NameData Value

3RD PARTY AGENCY

BBB/MO

REGION NUMBER

53

DATE OF LETTER (MM-DD-YYYY)

04-28-2004

DATE RECEIVED (MM-DD-YYYY)

04-29-2004

TIME RECEIVED (HH:MM)

08:48

1/5/2005

PE06-048-0179LC

All Action Details for Issue

Print

VIN: 1FMYU93143K [REDACTED] Year: 2003
Name: [REDACTED] Owner Status: Original
Symptom Desc: FIRE/SMOKE SCORCHED/BURNT UNDERHOOD
Reason Desc: LEGAL - ACCIDENT / FIRE
Issue Type: 07 LEGAL Issue Status: CLOSED

Model: ESCAPE Case: [REDACTED]
WSD: 2002-09-30
Primary Phone: [REDACTED]
Secondary Phone: [REDACTED]

Action: ADVISE CUST INFORMATION WILL BE SENT TO CONSUMER AFFAIRS

Dealer: 05240 DICK SMITHFORD, INC.

Origin Desc: US CONCERN CASE BASE

Odometer: 25000 MI

Comm Type: PHONE

Analyst Name: CAROLETTE EVANS

Analyst: CEVANS

Action Date: 04/20/2004

Action Time: 18.32.51.126

Action Data: Yes

Caller Information If Different From Vehicle Owner:

First Name

Middle Initial

Last Name

Day Phone

Relationship
FRIEND

Comments CUSTOMER SAYS: -CALLING ON BEHALF OF CUSTS ROOM MATE -ROOM MATES VEH IS INSURED UNDER CUSTS INSURANCE -CUSTS CAN BE CONTACTED AT WORK# IS [REDACTED] -SMARTT SYSTEM WILL NOT UPDATE CUSTS INFO WITH WORK# -THE FORD DLR IS DRAGGIN THEIR FEET TO TAKE CARE OF A CONCERN -THE ENGINE COUGHT FIRE YESTERDAY AND THERE WAS NO WARNING -THERE WAS SMOKE AND NO WARNING LIGHTS -THE FIRE DEPT CAME OUT TO PUT OUT THE SMOKE -FIRE DEPT SID IT LOOKED LIKE IT WAS ELECTRICAL -EVERYONE IS SAYING LET THE INSURANCE TAKE CARE OF THE ISSUE BUT CUST DOES NOT THINK THAT THE INSURANCE SHOULD TAKE OF THE CONCERN -CUST HAS CONTACTED THE INSURANCE COMPANY ALL STATE PER CUSTOMER, DEALER SAYS: DICK SMITH FORD, INC. -DLR TELLS CUST TO CONTACT INSURANCE TO TAKE CARE OF THE ISSUE 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. INFERENCE CASE ID: 5349

Data Element Name

Data Value

FIRE/ACCIDENT

F

Action: MAKE OUTBOUND CALL TO CUSTOMER

Dealer: 05240 DICK SMITHFORD, INC.

Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION

Odometer: 25000 MI

Comm Type: PHONE

Analyst Name: TANYA ROQUEMORE
(TROQUEMO)

Analyst: TROQUEMO

Action Date: 04/21/2004

Action Time:
11.13.44.528

Action Data: Yes

Comments LPA SPOKE TO CUSTOMER. CUSTOMER SAID THE VEHICLE IS AT THE DEALERSHIP. INSURANCE COMPANY IS GOING TO HAVE VEHICLE INSPECTED. DEALERSHIP WILL NOT DO INSPECTION. ENGINE IS BURNT, BUT THERE IS NOT ANY DAMAGE TO THE INTERIOR OF THE VEHICLE. CUSTOMER THINKS THAT FORD DEALERSHIP SHOULD COVER THE EXPENSE OF THE VEHICLE SINCE IT IS STILL UNDER WARRANTY AND THINKS FIRE WAS DUE TO A DEFECT.

Data Element Name

Data Value

CONTACT PERSON

Action: REFER TO INSURANCE CARRIER - INSURANCE COMPANY ALREADY INVOLVED

Dealer: 05240 DICK SMITHFORD, INC.

Origin Desc: CONSUMER AFFAIRS - LITIGATION

1/5/2005

PE06-048-0180LC

Odometer: 25000 MI
Analyst Name: TANYA ROQUEMORE
(TROQUEMO)

Action Date: 04/21/2004

Comm Type: PHONE
Analyst: TROQUEMO

Action Time:
12.01.36.141

PREVENTION

Action Data: No

Comments LPA INFORMED CUSTOMER TO WORK WITH INSURANCE COMPANY. SENT LETTER OF PREVIOUS INSURANCE INVOLVEMENT.

Action: UPDATE/ADDCO CASE

Dealer: 05240 DICK SMITHFORD, INC.

Odometer: 25000 MI
Analyst Name: TANYA ROQUEMORE
(TROQUEMO)

Action Date: 04/26/2004

Comm Type: OTHER
Analyst: TROQUEMO

Action Time:
12.09.48.701

Origin Desc: CONSUMER AFFAIRS - LITIGATION
PREVENTION

Action Data: No

Comments LPA REC'D DEALER REQUEST. CALLED AND SPOKE WITH SM WHO SPOKE TO ZM WHICH SAID THE CUSTOMER SHOULD HAVE INSURANCE COMPANY HANDLE THE INVESTIGATION. CUSTOMER IS AWARE TO LET INSURANCE COMPANY SUBROGATE.

All Action Details for Issue

[Print](#)

VIN: 1FMYU93143K [REDACTED] Year: 2003
Name: [REDACTED] Owner Status: Original
Symptom Desc: GENERAL INQUIRIES REQUEST/NON-VEHICLE RELATED
Reason Desc: RECALL/ONP - VEHICLE INVOLVEMENT
Issue Type: 02 INFORMATION Issue Status: CLOSED

Model: ESCAPE Case: [REDACTED]
WSD: 2002-09-30
Primary Phone: [REDACTED]
Secondary Phone: [REDACTED]

Action: ADVISE CUSTOMER OF RECALL/ONP; DOCUMENT CAMPAIGN NUMBER

Dealer: 05240 DICK SMITHFORD, INC.

Origin Desc: US INQUIRY CASE BASE

Odometer: 25000 MI

Comm Type: PHONE

Analyst Name: CAROLETTE EVANS

Analyst: CEVANS

Action Date: 04/20/2004

Action Time: 18.32.51.930

Action Data: Yes

Comments CUSTOMER SAYS: RECALL INFO -CUSTS ROOM MATE HEARD ABOUT THE RECALL NUT DID NOT HEAR TOO MUCH ABOUT IT PER CUSTOMER, DEALER SAYS: DICK SMITH FORD, INC. CAC ADVISED: - PLEASE ADVISE CUSTOMER OF THE INFORMATION FOUND IN THE THE CUSTOMER LETTER OR THE SEARCH ENGINE Q&A. - PLEASE DOCUMENT ANY INFORMATION PROVIDED TO CUSTOMER. - IF IN THE FUTURE YOU WISH TO CHECK AND SEE IF YOUR VEHICLE HAS ANY OPEN SAFETY OR EMISSIONS RECALLS PRESENT AND WOULD PREFER TO USE AN ELECTRONIC MEDIUM, THIS INFORMATION IS ALSO AVAILABLE AT WWW.FORD.COM, CLICK ON CONTACT US, THEN ASK KATE AND CHOOSE RECALLS AS THE TOPIC -==--NOTE -CUST DID NOT WANT THE DETAILS OF THE RECALL READ TO HER -CUST WOULD RATHER WAIT UNTIL THE LETTER COMES IN THE MAIL BECUASE IF THE VEH IS TOTALLED THEN THERE IS NO NEED FOR THE RECALL INFO INFERENCE CASE ID: 1039

Data Element Name**Data Value**

RECALL/ONP CAMPAIGN NUMBER

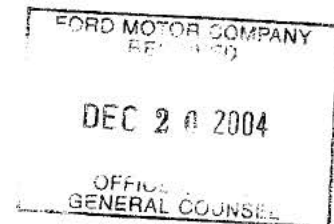
04S13



Certified Mail [REDACTED]

December 14, 2004

Ford Motor Company
Parklane Towers West, Suite 300
3 Parklane Blvd
Dearborn, MI 48126-2568



RE: Claim #: [REDACTED]
Our Insured: [REDACTED]
Loss Date: 4/19/04
Amt. of Claim: \$18710.50

Attention: [REDACTED]

The above noted subrogation claim has been identified as a product liability loss. We paid our insured for their loss and are looking to you for reimbursement. Should you or your carrier need more information, please call or write me. Please remit payment to Allstate Payment Processing Center, Attn: Subro Cash, PO Box 227257, Dallas, TX 75222-7257. Please include our claim number.

Complete description of the incident: Vehicle caught on fire while being driven due to a fuel leak where the return fuel line connected to the engine block.

Our statement of defect: Strict Liability

Location of evidence: IAA, 990 S. 68th Street, Kansas City, KS 66111. 913-299-9522, Stock # [REDACTED]

Manufacturer: Ford

Model: Escape

Year: 2003

VIN: 1FMYU93143K [REDACTED]

The following information is attached:

- Check copy
- Payment supporting paperwork
- C&O report and original photos
- List of insured's out of pocket loss

Please acknowledge receipt of this claim and your position regarding payment of our damages within 30 days.

Sincerely,

David Laughlin
David Laughlin, SCLA
Subrogation Senior Service Representative

4/19/04
\$18,710.50
'03 Escape
VIN
Kansas City, MO
~25,000

Roanoke National Subrogation Claims Center
3800 Electric Road, Suite 301, PO Box 21169, Roanoke, VA 24018
Phone: 1-800-776-2615 or (540) 989-2600 Fax: (540) 989-2640 or (540) 776-3803
Hours: 8:00 AM - 4:30 PM EST Monday - Friday

PE06-048-0183LC



**Consolidated Forensic
Investigations, Inc.**

Michael A. Schlatman
Charles T. Jacobs
Chief Executive Officers

CONFIDENTIAL

Date: May 20, 2004 CFI Number: [REDACTED]
Investigator: Larry W. Stemmerman Report Number: 1
Telephone: (913) 671-7500

Policy Number: [REDACTED]

Claim Number: [REDACTED]

Insured: [REDACTED]

Loss Location: [REDACTED]

Kansas City, Missouri

Date of Loss: April 19, 2004

Compiled For: Allstate Insurance Company
4400 College Boulevard, Suite 200
Overland Park, Kansas 66211

Attention Of: Ms. Stephanie Littleton

The release of this confidential report is solely the responsibility of the addressee.

Mid-Missouri Regional Office:
Post Office Box 1641
Columbia, MO 65205
Phone/Fax: 573-474-1105

Kansas City Main Office:
Post Office Box 16144
Shawnee Mission, KS 66203
Phone: 913-671-7500 Fax: 913-671-7503

St. Louis Field Office:
Post Office Box 715
Cedar Hill, MO 63016
Phone/Fax: 636-274-7349

PE06-048-0184LC



ASSIGNMENT

This assignment was received on April 19, 2004. Instructions were to conduct an origin and cause examination. This is a first and final report.

SUMMARY

On April 19, 2004 at approximately 3:15 p.m., the Kansas City, Missouri Fire Department responded to a vehicle fire located on Bannister Road, Kansas City, Missouri. The fire department extinguished the fire.

An origin and cause examination was conducted on April 23, 2004. Our examination revealed that the area of origin of the fire was within the engine compartment of a 2003 Ford Escape SUV. The area of origin of the fire was determined to be at a point where a hose was connected to the return fuel line that was attached to the engine.

It is our opinion that a fuel leak originated at that location. Vapors from the fuel were ignited by an ignition source within the engine compartment. The cause of the fire is accidental.

PROPERTY

The property involved in the loss was a 2003 Ford Escape SUV. The vehicle was powered by a V-6, 24 valve, fuel injected engine with automatic transmission with all wheel drive. The tire size was 23570R16. The automatic transmission of the vehicle had full power.

INVESTIGATION

An origin and cause investigation was conducted on April 23, 2004, beginning at approximately 1:30 p.m. Present and assisting this investigator was Mr. Shawn Humphrey, an automobile mechanic.



Exterior Examination

An exterior examination was conducted by first observing the front of the vehicle. Plastic material on the front of the grill had been partially consumed by the fire. The left headlight was partially melted. There was extensive fire damage to the exterior side of the hood. Most prevalent heat damage to the exterior side of the hood was directly in front of the steering wheel and slightly to the right. (Photograph 1)

The left side of the vehicle was examined. Minor heat damage was observed to the left front fender. The driver's door glass had been broken at some point in time. (Photograph 2)

The rear of the vehicle was examined. Attached to the rear of the vehicle was a Missouri license plate with number 407 FEN. There was no visible fire damage. (Photograph 3)

The right side was examined. The right front door glass had been broken. There did not appear to be other damage to the right side. (Photograph 4)

Interior Examination

The interior of the vehicle was then examined. The interior was eliminated as an area of origin of the fire. (Photograph 5)

Attached to the windshield was a Jiffy Oil maintenance sticker. Information on the maintenance sticker stated that the next date due for an oil change was June 15, 2004, or mileage of 26,781. (Photograph 6)

The engine compartment had sustained very extensive and severe fire damage throughout. Visible on top of the engine was a fire damaged EGR valve. The throttle body housing had detached from the air plenum. The throttle body had also sustained extensive fire damage. A part of a master cylinder had also been partially consumed by the fire. (Photograph 7)



During of the examination of the engine, the EGR valve was removed from the EGR valve tube. We observed very extensive fire damage to the left side of the engine. The throttle body had been detached from the engine during the progress of the fire. (Photograph 8)

Some debris was removed from the engine compartment, exposing the starter solenoid and the remains of the high pressure fuel line. (Photograph 9)

The examination of the high-pressure fuel line connection that was attached to the engine block revealed a safety clip on the line. (Photographs 10 & 11)

During the examination of the area below where the high-pressure fuel line was located, an attempt was made to locate any remains of the return fuel line. The return fuel line was not found. However, a clip that secured the return fuel line to the engine component of the engine block was found under debris.

The engine plenum was removed and we observed severe melting and damage to the plenum that had been directly over the location where the fuel return line had been attached to the engine block. (Photographs 12 & 13)

The clip that secured the fuel return line to the engine block was taken as an exhibit and is being retained by this investigator. (Photographs 14 & 15)

An exemplar vehicle with an identical engine was located at the dealership and examined for comparison purposes. (Photographs 16 & 17)

WITNESS INFORMATION

This investigator contacted the insured [REDACTED] by telephone. She provided the following information. The insured stated that she had just left work and driven approximately three miles and smoke



started coming into the car. According to the insured, the only thing she had done within those three miles was that she had turned the climate control to air conditioning.

The only recent work on the car, according to the insured, was an oil change approximately two months prior to the fire. The insured stated that she estimated the car had somewhere around 25,000 miles on it at the time of the fire. The insured stated that the first flames she saw were ones that she saw while walking away from the car, looking back and seeing fire dropping onto the street on the driver's side of the vehicle.

The insured was asked when she started the car prior to the fire if it started okay and she stated, "yes."

CONCLUSION

The cause of the fire is accidental. It is the opinion of this investigator and Mechanic Shawn Humphrey that the fire originated at a point where the return fuel line was connected to a component of the engine block. Fuel vapors were ignited at that point by an ignition source within the engine compartment.



STATUS

All instructions have been completed. This is a first and final report. If further investigation is desired in this or any other matter, please do not hesitate to contact us.

WITNESSES

- | | | |
|----|------------------|---------------------|
| 1. | Humphrey, Shawn* | Automobile Mechanic |
| 2. | [REDACTED] | Insured |

*Not interviewed for this report.



ENCLOSURES

1. 17 color photographs

Larry W. Stemmerman
Senior Investigator
(913) 671-7500

LWSsbm
Enclosures

PHOTOGRAPH DESCRIPTIONS
04P301



Photographs taken April 23, 2004

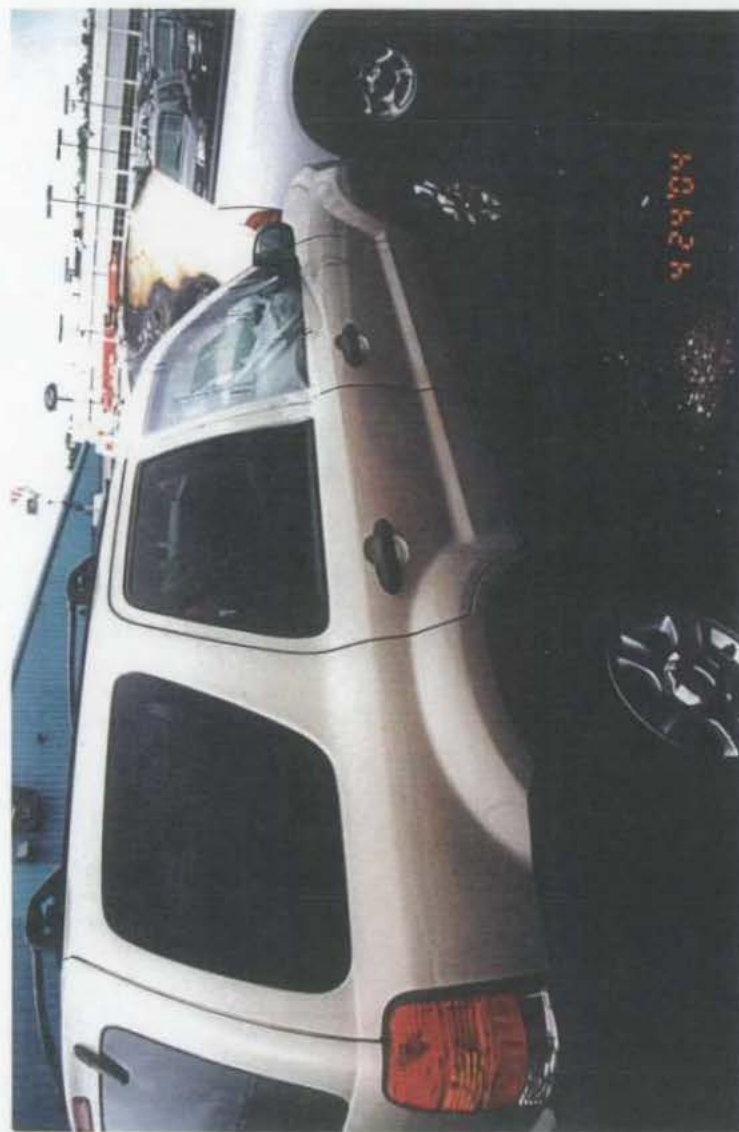
1. Front of vehicle, hood area. Note heat damage to the area of the vehicle near the point of the arrow.

2. Left side of vehicle.



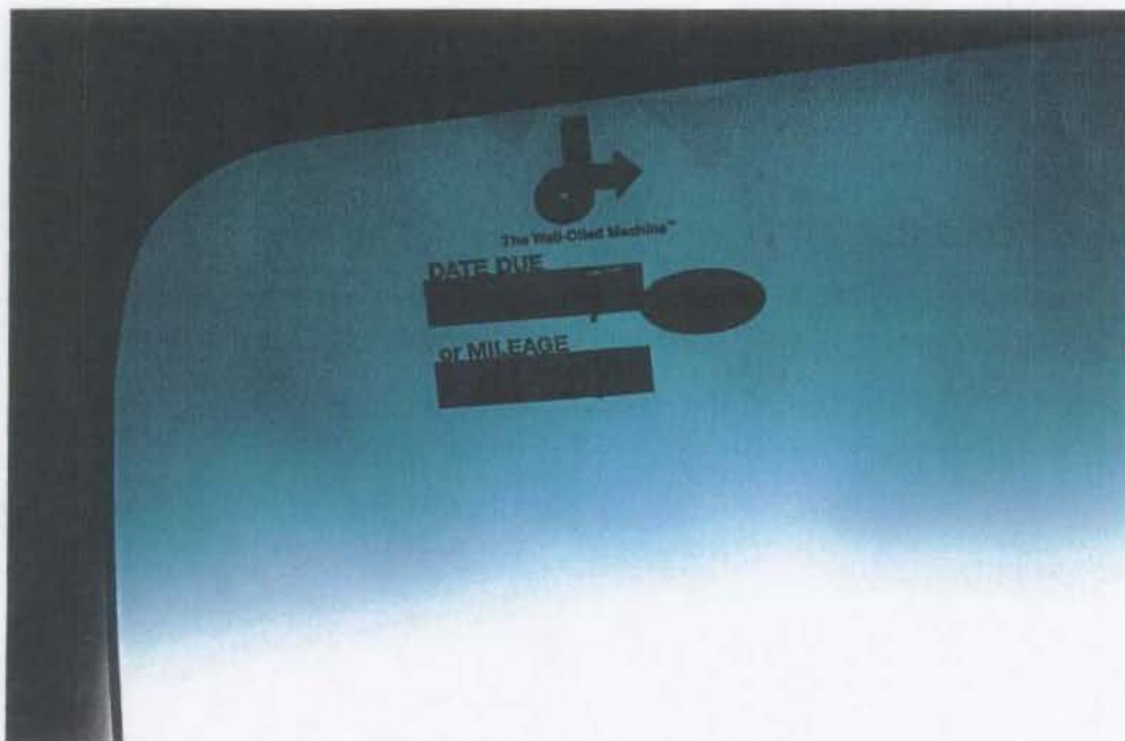
3. Rear of vehicle.

4. Right side of vehicle.



5. Passenger compartment.

6. Sticker attached to windshield.



7. Engine compartment. EGR valve is located at arrow 1. Throttle body is located at arrow 2.

8. Left to right view of right side of vehicle. EGR tube is located at arrow 1. The throttle body is located at arrow 2.



9. Engine compartment. Photograph taken left to right. Starter solenoid is located at arrow 1. High-pressure fuel line connection is located at arrow 2.

10. Close up view of starter solenoid at arrow 1. Component attached to high-pressure fuel line with safety clip is located at arrow 2.



11. Left side of vehicle showing connection to high-pressure fuel lines at arrow 1.

12. Underside of the air plenum.



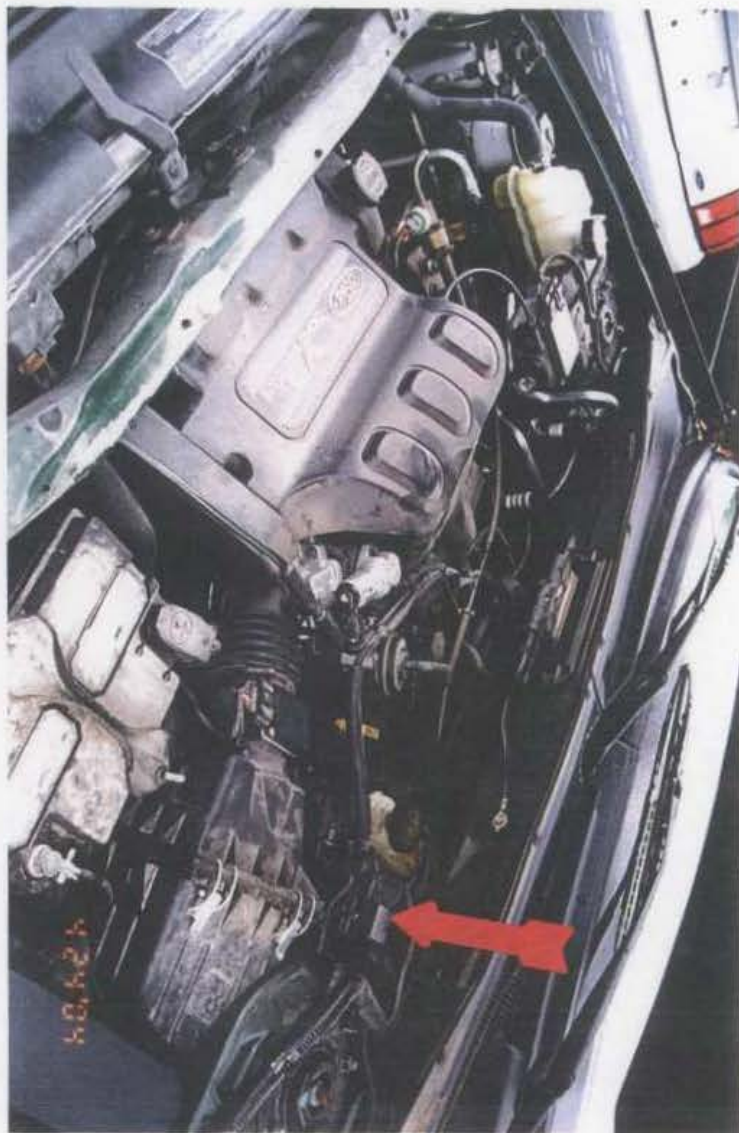
13. Close up view of underside of air plenum.

14. Clip that was attached to the return fuel line.

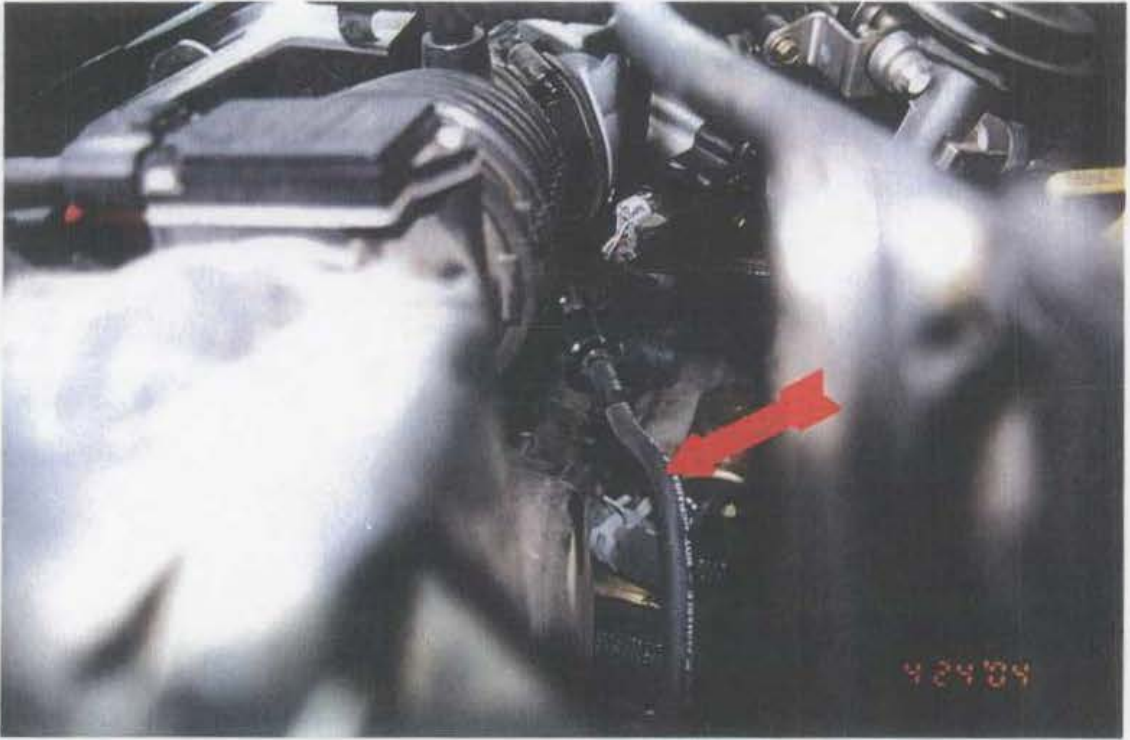


15. Clip that was attached to the return fuel line.

16. Engine compartment of exemplar vehicle. The return fuel line and charcoal canister are located at the point of the arrow.



17. High-pressure fuel line located on exemplar vehicle is located at the point of the arrow.





January 6, 2005

IN RE: Citizens Claim No. 2 [REDACTED]
H&A File No [REDACTED]
Date Received: January 3, 2005
[REDACTED]

PREDICATION:

This report is predicated upon the request of Ms. Amy Gervais, Citizens Claims Specialist, to conduct an investigation into [REDACTED] with special reference to the fire loss of a 2002 Ford, Escape.

SECRETARY OF STATE:

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

2002 FORD 1FMCU04112K [REDACTED]
24 STA-WAGON TRANSFER
05/14/2003 [REDACTED] ESCAPE 8712 A

[REDACTED]
WYANDOTTE [REDACTED]

NATIONAL CITY BANK
6750 MILLER RD 05/13/2003
BECKERVILLE OH 44141

REGISTRATION INFORMATION:

[REDACTED] PC-RENEWAL
04/04/2005 [REDACTED]

INSPECTION:

On January 3, 2005 at 1:00 p.m., Investigators Walt Herndon and Randy List arrived at Fleet Auto, in Riverview, to conduct an investigation into the fire loss of a 2002 Ford, Escape.

HERNDON

ASSOCIATES

Investigators / Consultants

36135 Schoolcraft
Livonia, Michigan 48150
Fax: 734-591-0140

1 800 961-2909
walt@herndon-assoc.com
dan@herndon-assoc.com

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

Licensed in Michigan,
Ohio, Illinois, Indiana and Arizona

www.herndon-assoc.com

PE06-048-0210LC

IN RE: Citizens Claim No. [REDACTED]
H&A File No. [REDACTED]
Date Received: January 3, 2005
[REDACTED]

January 6, 2005
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Once at the scene, a close inspection provided the following information:

SEE ENCLOSED INVESTIGATION REPORT

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

ORIGIN AND CAUSE INVESTIGATION:

On January 3, 2005 at 1:00 p.m., Investigators Walt Herndon and Randy List arrived at Fleet Auto Body, 18935 Quarry in Riverview, to conduct an origin and cause investigation into the fire loss of a 2002 Ford, Escape, gray in color, Vehicle Identification Number 1FMCU04112KB [REDACTED]. Upon arriving at the auto body facility, the vehicle was located and identified by its Vehicle Identification Number found in the area of the windshield and dash.

Initial observations reveal evidence of a fire to have originated within the engine compartment that extended to blistering of the painted surface of the hood in the left rear. The fire further extended to the plastic cowl and windshield wiper motor.

The investigation is now focused to the remainder of the painted surface of the vehicle, and there is no evidence of any direct fire impingement.

The examination of the fuel tank, fill tube and fuel cap, as well as the underside of the vehicle, reveals no evidence of any fuel leakage or fire damage.

Entry is now gained into the cargo area, where there is a plastic container with car care products. The examination further reveals a blanket.

The examination is now focused to the passenger compartment, where there is no evidence of any direct fire impingement. The examination does reveal aftermarket seat covers and an aftermarket cover for the steering wheel.

The investigation is now focused to the dashboard area, where there is a Kenwood AM/FM CD player, which is aftermarket, which has been installed. The examination further reveals the dashboard is intact with no evidence of any direct fire impingement.

IN RE: Citizens Claim No. [REDACTED]
H&A File No. 05-0001VF
Date Received: January 3, 2005
[REDACTED]

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The investigation is now focused to the windshield, where there is an oil change sticker, indicating the next oil change due February 9, 2005 at 32,715 miles.

Entry is now gained into the engine compartment, where a check of the fluid levels reveals all are full, clean and within the safe range.

The investigation is now focused to the battery, where there is an aftermarket power cable running to the battery, there is an in-line fuse, 40 amp, which has failed. The examination reveals that the aftermarket cable is routed along the shock tower on the left or driver's side, enters the passenger compartment, where there is an aftermarket module for a remote start. The examination of this cable reveals a small area void of insulation, which is within the area of origin. The examination further reveals a factory wiring harness, which is arced in two, which is sufficient to ignite the wiring insulation and immediate combustibles, with the fire extending to the cowl area, windshield wiper motor area and wiring harnesses within this area that travel to the power distribution center.

The investigation of the two bolts that extend through the shock tower reveal a plastic clip on one, the second one had melted plastic present. The examination further reveals that the power cable, which is aftermarket, that travels through the bulkhead, was resting against the factory wiring harness, which would have caused the movement of the factory wiring harness.

At this time, after completing an examination of the vehicle, it was the opinion of both Investigators that the fire was accidental in nature. It is further the opinion of both Investigators that the fire originated within a short to ground in the factory wiring harness, sufficient to ignite the wiring insulation, with the fire extending, causing the damage present. The fire is deemed to be an accidental fire, electrical in nature.

At this time, Investigators are unable to rule out the installation of the aftermarket power cable for the remote starter as being a cause of the fire.

TITLE INFORMATION:

A review of the title information indicates that the vehicle was transferred into the name of [REDACTED], Wyandotte, Michigan on May 14, 2003. At the time of the transfer, the odometer showed 8,712 actual miles. The first secured interest is listed

IN RE: Citizens Claim No. [REDACTED]
H&A File No. [REDACTED]
Date Received: January 3, 2005
[REDACTED]

January 6, 2005
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as National City Bank as of May 13, 2003. The Michigan license plate of [REDACTED] was not due to expire until April 4, 2005. The driver's license number listed on the registration was [REDACTED]
[REDACTED]

NICB VINASSIST:

A review of the NICB Vinassist indicates that the 2002 Ford, Escape XLT 4x4 is equipped with a 3.0 liter, V6 engine and was assembled in Kansas City, Clacoma, Missouri.

NATIONAL HIGHWAY TRAFFIC & SAFETY ADMINISTRATION:

A search of the National Highway Traffic & Safety Administration, Recall Database produced three records pertaining to 2002 Ford, Escape vehicles. A review of these records revealed none pertained to the fire in question.

ALLDATA SYSTEM:

A search of the Alldata System produced three recalls and a number of Technical Service Bulletins pertaining to 2002 Ford, Escape four wheel drive vehicles, equipped with 3.0 liter engines. A review of these records revealed none pertained to the fire in question.

DEARBORN FIRE DEPARTMENT:

A search of the Dearborn Fire Department records produced incident number [REDACTED]. According to this report, the Dearborn Fire Department responded to a vehicle fire on December 30, 2004 at 12:40 p.m. at 2331 Monroe in the City of Dearborn. The fire department arrived at 12:45 p.m. and cleared the scene at 1:09 p.m. Further review of the report reveals that the area of origin was listed as the engine area, with the heat source and item first ignited listed as undetermined.

A review of the narrative report reveals that the fire department was called to the scene at [REDACTED] reference a car fire. Upon arrival, they were met by the car owner. She stated they were

IN RE: Citizens Claim No. [REDACTED]
H&A File No. [REDACTED]
Date Received: January 3, 2005
[REDACTED]

January 6, 2005
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in the doctor's office when a person came into the office and stated there was a Ford, Escape on fire in the parking lot. The owner and her father went out to the Escape and there was a small fire under the hood. The father lifted up the hood and put the fire out with snow and a dry chemical fire extinguisher. They found no active fire. The burn damage from the fire was in the area of the firewall and windshield wiper motor area, burning the motor itself and some plastic and other wiring. Engine 2 disconnected the battery and the owner was told not to drive the SUV and have it towed to the shop and call her insurance company. (See enclosed report.)

INTERVIEW (HEATHER MASSERANT):

On January 4, 2005 at 6:05 p.m., Investigator Randy List conducted an interview with [REDACTED] who is the title holder, named insured and primary operator of the vehicle in question. Further questioning revealed that at the time of the fire, the vehicle was parked and that no one else operates the vehicle other than the insured.

When questioned regarding any recent complaints or problems with the vehicle, she indicated she has had none.

The fire was discovered on December 30, 2004 between 12:30 and 12:45 p.m., and the weather conditions were clear and 40 degrees. The location of the fire was [REDACTED] in Dearborn. Specifically, the vehicle was in a parking lot. Subsequently, unknown person(s) contacted 911 and the Dearborn Fire Department responded in under five minutes and extinguished a fire involving a 2002 Ford, Escape, gray in color. The vehicle in question was purchased used in the spring of 2003 from J&E Vehicle. At the time of the purchase, the remainder of the three year, 36,000 mile warranty was in effect on the vehicle and no extended warranty was obtained.

When questioned regarding any warranty service performed on the vehicle, the insured indicated she has had none. When questioned regarding any service work performed on the vehicle, the insured indicated she has had none.

At the time of the fire, the fuel tank was approximately three-quarters full, it was learned that both Heather and Harry check the fluid levels. When questioned regarding who the last person was to have entered the engine compartment, the insured indicated Loveday's Oil Change Facility in Southgate on November 11, 2004.

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H&A File No. [REDACTED]
Date Received: January 3, 2005
[REDACTED]

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Oil changes are secured every 3,000 miles and in between oil changes, she does not have to add any other fluids.

When questioned regarding any mechanical or electrical problems with the vehicle, the insured indicated she has had none. Mileage at the time of the purchase was approximately 8,000 miles, mileage at the time of the loss was approximately 32,000 miles.

When questioned regarding receiving any recall notices, campaigns or correspondence from the manufacturer, the insured indicated she had, there were several, and all were satisfied at Southgate Ford.

The insured went on to state that she is a nonsmoker and no one was smoking in or around the vehicle prior to it being parked.

When questioned regarding adding any accessories to the vehicle since the purchase, she indicated that she had an aftermarket AM/FM CD player installed by Mickey Shorr in April of 2003. The Mickey Shorr is located on Fort Street in Lincoln Park.

The insured went on to state that she had the remote start installed by Mickey Shorr in the fall of 2003, and she would attempt to locate the receipts and fax same to this office.

When questioned regarding any non-factory wiring on the vehicle, the insured indicated the remote start. The insured went on to state that the vehicle is equipped with a factory alarm system and keyless entry.

Since ownership of the vehicle, it has not been involved in an accident and it was learned that at the time of the discovery of the fire, the vehicle had been parked for 45 minutes. Accessories being operated prior to parking the vehicle were none.

The insured went on to state that the vehicle is wired for a trailer.

Just prior to the discovery of the fire, she did not observe any fluid leaks, she did not experience any operability problems, no warning lights were illuminated, she did not detect any odors or hear any noises. The smoke was first observed emanating out from under the hood on the driver's side and was gray and white. The fire was first observed after the hood was open, the

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flames were at the back of the engine, by the windshield, on the driver's side. The color of the flames were orange. The hood was closed, then opened by her father to see what was burning.

At the time of the fire, all doors were closed and locked and all windows were up.

In a short scenario, the insured stated the vehicle had been driven approximately 30 minutes, then parked at the doctor's office. Approximately 30 to 45 minutes later, someone came into the doctor's office and stated a car was on fire. The insured's father went to the lot to discover the vehicle was smoking under the hood on the driver's side. The insured's father opened the hood and flames were seen under the hood by the driver's windshield. Snow was thrown on the fire, the fire department arrived and put it out with water. No one photographed the vehicle at the fire location and the firemen indicated that the probable cause was the windshield wiper motor. The insured has no idea as to the cause of the fire.

As a result of the fire, no other vehicles or property were damaged and no other fire investigators, public or private, have contacted the insured. Further, no items were removed from the area where the fire was first observed.

Contents in the passenger compartment included CDs, personal things and a baseball bat. Contents within the trunk compartment were a first aide kit and a vehicle emergency kit.

CONCLUSION:

Having completed an examination of the vehicle, examined an exemplar vehicle, conducted research pertaining to the vehicle in question, interviewed the insured, who was an eye witness to the fire, and based upon all of the information known at the time of the preparation of this report, it is the opinion of both Investigators that the fire was accidental in nature. It is further the opinion of both Investigators that the fire originated within a factory harness located in the left rear of the engine compartment, in the immediate area of the shock tower and brake booster, where there is evidence of electrical faulting sufficient to ignite the wiring insulation and immediate combustibles into open flame, with the fire extending, causing the damage present. The fire is deemed to be an accidental fire, electrical in nature.

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It should be noted that Investigators cannot rule out the installation of the power cable and the routing of the power cable as being a contributing factor, causing the short to ground in the factory wiring.

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



Walter O. Herndon, Jr.



Randy J. List

WOH/jam

VEHICLE FIRE INVESTIGATION

Fire Dept. DETROIT

Incident No. _____

Date/Time Of Investigation 1-3-05 @ 1:00 PM

Vehicle Examined At FLSET AUTO, RIVERVIEW

Location At Time Of Fire _____

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

Date Of Fire 1-3-05 Day THURSDAY Time of Call _____ Arrived _____ Clear _____

Description Of Vehicle

Title Holder	[REDACTED]		
Owner	[REDACTED]		
Address	<u>Wyandotte, MI</u>		
Year	<u>2002</u>	Make	<u>Ford</u>
		Model	<u>ESCAPE</u>
Color: (Top)	<u>Grey</u>	(Bottom)	<u>Grey</u>
License Plate:			
State	<u>MICHIGAN</u>	Number	<u>SCV559</u>
		Expiration Date	[REDACTED]
Vehicle Identification Number:	<u>1FMCU04112K</u>		
Lien Holder:	<u>NATIONAL</u>		
	<u>5-13-03</u>		
Insurance Company:	<u>CITIZENS</u>		

Passenger Compartment (Interior)

1	Dashboard:	Intact ☒	Missing ☐	Partially Consumed ☒	Consumed ☐
2	Radio:	Intact ☒	Missing ☐	Aftermarket ☒	<u>K-WOOD</u>
3	Speakers:	Intact ☒	Missing ☐	Aftermarket ☐	
4	Bulkhead:	Intact ☒	Breached By Fire ☒		
5	Ignition:	Intact ☒	Missing ☐	On Position ☐	Off Position ☒
		Locked ☐	Thumb Assist Off ☐		
	Tampered With/Intact	☐	Tampered With/Defeated	☐	Destroyed By Fire ☐
6	Steering Column:	Intact/Locked ☒	Intact/Unlocked ☐	Tampered With/Intact	☐
		Tampered With/Defeated ☐	Missing ☐	Destroyed By Fire	☐
7	Gear Shift Selector (Column ☐ Floor ☒	Locked ☒	Unlocked ☐	Destroyed By Fire	☐
		Manual ☐			
8	Front Seat:	Intact ☒	Missing ☐	Partially Consumed	Consumed ☐
9	Rear Seat:	Intact ☒	Missing ☐	Partially Consumed	Consumed ☐
10	Third Seat:	Intact ☒	Missing ☐	Partially Consumed	Consumed ☐
					N/A ☒
11	Glove Box:	Intact ☒	Partially Consumed ☐	Consumed ☐	
	Items In Glove Box				
	Owner's Manual	☒	Miscellaneous Papers	☐	
12	Center Console	Intact ☒	Partially Consumed ☐	Consumed ☐	N/A ☐
	Items In Center Console				

VEHICLE FIRE INVESTIGATION

2

Passenger Compartment (Interior) Cont.

13	Air Bags:					
	Steering Wheel:	Intact ☒	Missing ☐	Deployed ☐	Fire Damaged ☐	N/A ☐
	Passenger Side Dash:	Intact ☒	Missing ☐	Deployed ☐	Fire Damaged ☐	N/A ☐
	Right Rear:	Intact ☐	Missing ☐	Deployed ☐	Fire Damaged ☐	N/A ☒
	Left Rear:	Intact ☐	Missing ☐	Deployed ☐	Fire Damaged ☐	N/A ☒
	Side Air Bags (Driver):	Intact ☐	Missing ☐	Deployed ☐	Fire Damaged ☐	N/A ☒
	Side Air Bags (Pass):	Intact ☐	Missing ☐	Deployed ☐	Fire Damaged ☐	N/A ☒
	Headliner/Curtain:	Intact ☐	Missing ☐	Deployed ☐	Fire Damaged ☐	N/A ☒
14	Ignition Key:	None Found ☐	In Ignition ☒	A Debris ☐		
15	Odometer Reading: <u>32,715</u>					
	Analog ☐	Digital ☐	Vandalized ☐	Oil Change Sticker ☒		
	Removed ☐	Destroyed By Fire ☐	Date: <u>2-9-05</u>			
16	Title Information: (Date Of Transfer To Current Owner/Mileage)					
17	Ashtray: Smoking Materials Present ☐ Yes ☒ No ☐ Unk ☐ Cigar Lighter ☐ Unk ☐					
18	Personal Effects In Passenger Compartment <u>CANDY, SUNDRIES, AFTERMKT matts, SEAT COVERS, STEERING WHEEL CARK.</u>					

NEXT SERVICE



You can always trust the guys who use Valvoline.
Loveday's, Inc.
 18700 Northline Road
 Southgate, MI 48195
 734-374-0202

Thank you
For Your Business

Date: 02/09/05 Mileage: 32,715

Engine Compartment

19	Engine Accessibility:	Limited (Hood Jammed) ☐	Open ☒	Forced Open By Investigator ☐
20	Engine:	Intact ☒	Missing ☐	Partially Stripped ☐
21	Battery:	Intact ☒	Missing ☐	Fire Damaged ☐
22	Aux Battery:	Intact ☒	Missing ☐	Fire Damaged ☐
23	Radiator:	Intact ☒	Missing ☐	Fire Damaged ☐
Fluid Levels - NOTE: D.B.F. = DRAINED BY FIRE				
24	Oil <u>FULL</u>	Transmission <u>FULL</u>	Radiator <u>FULL</u>	Brake <u>FULL</u>
	D.B.F. ☐	D.B.F. ☐	D.B.F. ☐	D.B.F. ☐
25	Belts:	Intact ☒	Partially Consumed ☐	Consumed ☐
26	Upper Hose:	Intact ☒	Partially Consumed ☐	Consumed ☐
27	Lower Hose:	Intact ☒	Partially Consumed ☐	Consumed ☐
28	Engine Parts Missing:			
29	Anti-Theft System:	Factory ☒	Type: <u>SECURE LOCK</u>	Unknown ☐
30	Additional Information: <u>AFTERMKT Remote Start (MICKEY SHORES)</u>			

Exterior Examination

31	Tires:				
	Type	Custom Wheels/ Wheel Covers	% of Tread Wear	No. Of Lugs	Missing
LF	<u>4/1000</u>	<u>4</u>	<u>9/32</u>	<u>ALL</u>	
LR					
RR					
RF					

VEHICLE FIRE INVESTIGATION 3

Door Cylinders (Locks)

32	Driver Door:	Intact	☒	Fire Damaged	☐	Forced Entry	☐
33	Left Rear (sliding/cargo) Door(s):	Intact	☒	Fire Damaged	☐	Forced Entry	☐
34	Rear Cargo Door(s):	Intact	☐	Fire Damaged	☐	Forced Entry	☐
35	Right Rear (sliding/cargo) Door(s):	Intact	☒	Fire Damaged	☐	Forced Entry	☐
36	Passenger Door:	Intact	☒	Fire Damaged	☐	Forced Entry	☐

Trunk Compartment Examination

37	Pickup	☐	Van	☐	Utility Vehicle	☒	Other	☐
38	Trunk Lock:	Intact	☐	Locked	☐	Open	Fire Damaged	Forced
39	If Forced, By Whom?							
40	Trunk Release:	Yes ☐	No ☐	Unknown ☐	Entry To Trunk:	Yes ☐	No ☐	

Trunk Contents

41	Spare Tire:	Intact	☒	Missing	☐	On Vehicle	☐	Fire Damaged	☐
42	Tire Change Equipment:	Intact	☐	Missing	☐	At Scene	☐	Engine Compartment	☐
43	CD Changer	Yes	☐	No	☐	Other Contents/Personal Effects In Trunk Compartment/Cargo Area:			
	<i>Blanket, Survival Kit</i>								

Glass Condition

44	Windshield:	Intact	☒	Missing	☐	Melted/Cracked By Heat	☐	Broken	☐	In	☐	Out	☐
45	Electric Windows:	Yes	☒	No	☐								
46	Driver's Window:	Intact	☒	Missing	☐	Melted/Cracked By Heat	☐	Broken	☐	In	☐	Out	☐
	Position:	Up	☒	Down	☐								
47	Left Rear Window:	Intact	☒	Missing	☐	Melted/Cracked By Heat	☐	Broken	☐	In	☐	Out	☐
	Position:	Up	☒	Down	☐	Stationary	☐	Moveable	☐				
48	Left Rear 3 rd Window:	Intact	☐	Missing	☐	Melted/Cracked By Heat	☐	Broken	☐	In	☐	Out	☐
	Position:	Stationary	☒	Moveable	☐								
49	Rear Window:	Intact	☒	Missing	☐	Melted/Cracked By Heat	☐	Broken	☐	In	☐	Out	☐
50	Right Rear 3 rd Window:	Intact	☒	Missing	☐	Melted/Cracked By Heat	☐	Broken	☐	In	☐	Out	☐
	Position:	Stationary	☐	Moveable	☐								
51	Right Rear Window:	Intact	☒	Missing	☐	Melted/Cracked By Heat	☐	Broken	☐	In	☐	Out	☐
	Position:	Up	☒	Down	☐	Stationary	☐	Moveable	☐				

VEHICLE FIRE INVESTIGATION 4

52	Passenger Window:	Intact ☒	Missing ☐	Melted/Cracked By Heat ☐	Broken ☐	In ☐	Out ☐
	Position:	Up ☒	Down ☐				
53	Sun Roof:	Open ☐	Missing ☐	Closed ☐	Fire Damaged ☐		
54	Convertible:	Up ☐	Missing ☐	Down ☐	Fire Damaged ☐		
55	T-Top:	On ☐	Missing ☐	Fire Damaged ☐			
56	Hard/Soft Top:	On ☐	Missing ☐	Fire Damaged ☐			

Under Vehicle

57	Gasoline ☒	Diesel ☐	Natural Gas ☐	Electric ☐	Hybrid ☐
58	1. Fuel Tank:	Intact ☒	Missing ☐	Fire Damaged ☐	
59	1. Fill Pipe:	Intact ☒	Missing ☐	Fire Damaged ☐	
60	1. Fuel Cap:	Intact ☒	Missing ☐	Fire Damaged ☐	
61	2. Fuel Tank:	Intact ☐	Missing ☐	Fire Damaged ☐	
62	2. Fill Pipe:	Intact ☐	Missing ☐	Fire Damaged ☐	
63	2. Fuel Cap:	Intact ☐	Missing ☐	Fire Damaged ☐	
64	Transmission Pan:	Intact ☒	Missing ☐	Leakage Noted ☐	Yes ☐ No ☒
65	Oil Pan:	Intact ☒	Missing ☐	Leakage Noted ☐	Yes ☐ No ☒

NOTE: For Damage * L = Light M = Medium H = Heavy

	Areas	Open	Closed	Missing	Rust	Damage *	Vandalized	Consumed
66	Front Bumper:							
67	Hood:							
68	Grille:							
69	Left Fender:							
70	Driver's Door:							
71	Left Rear (sliding/cargo)							
72	Left Quarter Panel:							
73	Trunk Lid/Tail Gate:							
74	Rear Cargo Door(s):							
75	Rear Bumper:							
76	Roof:							
77	Right Quarter Panel:							
78	Right Rear (sliding/cargo)							
79	Passenger Door:							
80	Right Fender:							

81	Body Condition:	Excellent ☐	Good ☒	Fair ☐	Poor ☐
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82	Evidence Confiscated:	
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Investigated By:

A FDID <u>08205</u> State <u>MI</u> Incident Dt <u>12/30/2004</u> Station <u>2</u> Incident Number <u>[REDACTED]</u> Exposure <u>000</u>		☐ Delete ☐ Change ☐ No Activity		NFIRS -1 Basic	
B Location* ☐ Check this box to indicate that the address for this incident is provided on the Wildland Fire Module in Section 3 "Alternative Location Specification". Use only for Wildland fires.					
☒ Street address <u>[REDACTED]</u> ☐ Intersection Number/Milepost Prefix Street or Highway Street Type Suffix ☐ In front of ☐ Rear of <u>Dearborn</u> <u>MI</u> <u>[REDACTED]</u> - <u>[REDACTED]</u> ☐ Adjacent to Apt./Suite/Room City State Zip Code ☐ Directions Cross street or directions, as applicable					
C Incident Type * <u>131</u> Passenger vehicle fire Incident Type		E1 Date & Times Midnight is 0000 Check boxes if dates are the same as Alarm Date. Alarm always required Alarm ☒ Month <u>12</u> Day <u>30</u> Year <u>2004</u> Hr <u>12</u> Min <u>40</u> Sec <u>00</u> ARRIVAL required, unless canceled or did not arrive ☒ Arrival ☒ Month <u>12</u> Day <u>30</u> Year <u>2004</u> Hr <u>12</u> Min <u>45</u> Sec <u>00</u> CONTROLLED Optional, Except for wildland fires ☐ Controlled LAST UNIT CLEARED, required except for wildland fires ☒ Last Unit Month <u>12</u> Day <u>30</u> Year <u>2004</u> Hr <u>13</u> Min <u>09</u> Sec <u>00</u> ☒ Cleared		E2 Shift & Alarms Local Option <u>2</u> <u>01</u> <u>2D</u> Shift or Alarms District Platoon	
D Aid Given or Received* 1 ☐ Mutual aid received Their FDID Their State 2 ☐ Automatic aid recvd. 3 ☐ Mutual aid given 4 ☐ Automatic aid given Their Incident Number 5 ☐ Other aid given 6 ☒ None		E3 Special Studies Local Option Special Study ID# Special Study Value			
F Actions Taken * <u>86</u> Investigate Primary Action Taken (1) Additional Action Taken (2) Additional Action Taken (3)		G1 Resources * ☒ Check this box and skip this section if an Apparatus or Personnel form is used. Apparatus Personnel Suppression <u>0001</u> <u>0003</u> EMS Other ☐ Check box if resource counts include aid received resources.		G2 Estimated Dollar Losses & Values LOSSES: Required for all fires if known. Optional for non fires. None Property \$ <u>[REDACTED]</u> , <u>002</u> , <u>000</u> ☐ Contents \$ <u>[REDACTED]</u> , <u>000</u> , <u>000</u> ☐ PRE-INCIDENT VALUE: Optional Property \$ <u>[REDACTED]</u> , <u>018</u> , <u>000</u> ☐ Contents \$ <u>[REDACTED]</u> , <u>000</u> , <u>000</u> ☐	
Completed Modules ☒ Fire-2 ☐ Structure-3 ☐ Civil Fire Cas.-4 ☐ Fire Serv. Cas.-5 ☐ EMS-6 ☐ HazMat-7 ☐ Wildland Fire-8 ☒ Apparatus-9 ☒ Personnel-10 ☐ Arson-11		H1* Casualties None Deaths Injuries Fire Service <u>[REDACTED]</u> <u>[REDACTED]</u> Civilian <u>[REDACTED]</u> <u>[REDACTED]</u> H2 Detector Required for Confined Fires. 1 ☐ Detector alerted occupants 2 ☐ Detector did not alert them U ☐ Unknown		H3 Hazardous Materials Release N ☐ None 1 ☐ Natural Gas: slow leak, no evaluation or HazMat actions 2 ☐ Propane gas: <21 lb. tank (as in home BBQ grill) 3 ☐ Gasoline: vehicle fuel tank or portable container 4 ☐ Kerosene: fuel burning equipment or portable storage 5 ☐ Diesel fuel/fuel oil: vehicle fuel tank or portable 6 ☐ Household solvents: home/office spill, cleanup only 7 ☐ Motor oil: from engine or portable container 8 ☐ Paint: from paint cans totaling < 55 gallons 0 ☐ Other: Special HazMat actions required or spill > 55gal.. Please complete the HazMat form	
J Property Use* Structures 131 ☐ Church, place of worship 161 ☐ Restaurant or cafeteria 162 ☐ Bar/Tavern or nightclub 213 ☐ Elementary school or kindergarten 215 ☐ High school or junior high 241 ☐ College, adult education 311 ☐ Care facility for the aged 331 ☐ Hospital Outside 124 ☐ Playground or park 655 ☐ Crops or orchard 669 ☐ Forest (timberland) 807 ☐ Outdoor storage area 919 ☐ Dump or sanitary landfill 931 ☐ Open land or field		341 ☐ Clinic, clinic type infirmary 539 ☐ Household goods, sales, repairs 342 ☐ Doctor/dentist office 579 ☐ Motor vehicle/boat sales/repair 361 ☐ Prison or jail, not juvenile 571 ☐ Gas or service station 419 ☐ 1-or 2-family dwelling 599 ☐ Business office 429 ☐ Multi-family dwelling 615 ☐ Electric generating plant 439 ☐ Rooming/boarded house 629 ☐ Laboratory/science lab 449 ☐ Commercial hotel or motel 700 ☐ Manufacturing plant 459 ☐ Residential, board and care 819 ☐ Livestock/poultry storage (barn) 464 ☐ Dormitory/barracks 882 ☐ Non-residential parking garage 519 ☐ Food and beverage sales 891 ☐ Warehouse 936 ☐ Vacant lot 981 ☐ Construction site 938 ☐ Graded/care for plot of land 984 ☐ Industrial plant yard 946 ☐ Lake, river, stream 951 ☐ Railroad right of way 960 ☐ Other street 961 ☐ Highway/divided highway 962 ☐ Residential street/driveway Lookup and enter a Property Use code only if you have NOT checked a Property Use box: Property Use <u>UUU</u> Undetermined			

NFIRS-1 Revision 03/11/99

K1 Person/Entity Involved

Local Option

Business name (if applicable)

Area Code

Phone Number

☐ Check This Box if same address as incident location. Then skip the three duplicate address lines.

Mr., Ms., Mrs. First Name

MI

Last Name

Suffix

Number

Prefix

Street or Highway

Street Type

Suffix

Post Office Box

Apt./Suite/Room

City

State

Zip Code

☐ More people involved? Check this box and attach Supplemental Forms (NFIRS-1S) as necessary

K2 Owner☐

Same as person involved? Then check this box and skip The rest of this section.

Local Option

Business name (if Applicable)

Area Code

Phone Number

☐ Check this box if same address as incident location. Then skip the three duplicate address lines.

Mr., Ms., Mrs. First Name

MI

Last Name

Suffix

Number

Prefix

Street or Highway

ST

Suffix

Post Office Box

Apt./Suite/Room

Wyandotte

City

MI

State

Zip Code

L Remarks

Local Option

Called to the scene [REDACTED] for a car fire, upon E2 arrival E2 crew was met by the car owner. Stated that they were in a Doctors office when a person came in to the office and stated that there was a Ford Escape on fire in the parking lot. The owner and her father went out to the Escape and there was a small fire under the hood. The father lifted up the hood and put the fire out with snow and a dry chemical ext. we found no active fire, the burn damage from the fire was in the area of the fire wall and windshield wiper motor area. Burning the motor itself and some plastic and other wiring. E2 crew disconnected the battery, the owner was told not to drive the SUV and have it towed to a shop and call her insurance Company. E2 went back in service. Owner [REDACTED] st Wyandotte, MI [REDACTED]

L Authorization

156

Officer in charge ID

Guentner, Ronald W

Signature

FF2

Position or rank

Assignment

12

30

2004

Month Day Year

Check Box if same as Officer in charge.

156

Member making report ID

Guentner, Ronald W

Signature

FF2

Position or rank

Assignment

12

30

2004

Month Day Year

A FDID 08205 State MI Incident Date 12/30/2004 Station 2 Incident Number [REDACTED] Exposure 000		☐ Delete ☐ Change ☐ No Activity NFIRS -2 Fire	
--	--	---	--

B Property Details B1 ☐ Not Residential Estimated Number of residential living units in building of origin whether or not all units became involved B2 ☒ Buildings not involved Number of buildings involved B3 ☐ None Acres burned (outside fires) ☐ Less than one acre	C On-Site Materials or Products ☐ None Complete if there were any significant amounts of commercial, industrial, energy or agricultural products or materials on the Property, whether or not they became involved Enter up to three codes. Check one or more boxes for each code entered. On-site material (1) On-site material (2) On-site material (3) 1 ☐ Bulk storage or warehousing 2 ☐ Processing or manufacturing 3 ☐ Packaged goods for sale 4 ☐ Repair or service 1 ☐ Bulk storage or warehousing 2 ☐ Processing or manufacturing 3 ☐ Packaged goods for sale 4 ☐ Repair or service 1 ☐ Bulk storage or warehousing 2 ☐ Processing or manufacturing 3 ☐ Packaged goods for sale 4 ☐ Repair or service
---	---

D Ignition D1 83 Engine area, running Area of fire origin ★ D2 00 Undetermined Heat source ★ D3 00 Undetermined Item first ignited ★ ☐ Check Box if fire spread was confined to object of origin D4 ☐ ☐ Type of material first ignited Required only if item first ignited code is 00 or <70	E1 Cause of Ignition ☐ Check box if this is an exposure report. Skip to section G 1 ☐ Intentional 2 ☐ Unintentional 3 ☐ Failure of equipment or heat source 4 ☐ Act of nature 5 ☐ Cause under investigation U ☐ Cause undetermined after investigation	E3 Human Factors Contributing To Ignition Check all applicable boxes 1 ☐ Asleep ☐ None 2 ☐ Possibly impaired by alcohol or drugs 3 ☐ Unattended person 4 ☐ Possibly mental disabled 5 ☐ Physically Disabled 6 ☐ Multiple persons involved 7 ☐ Age was a factor Estimated age of person involved 1 ☐ Male 2 ☐ Female
--	---	---

F1 Equipment Involved In Ignition ☐ None If Equipment was not involved, skip to Section G Equipment Involved Brand Model Serial # Year	F2 Equipment Power Equipment Power Source F3 Equipment Portability 1 ☐ Portable 2 ☐ Stationary Portable equipment normally can be moved by one person, is designed to be use in multiple locations, and requires no tools to install.	G Fire Suppression Factors Enter up to three codes. ☐ None Fire suppression factor (1) Fire suppression factor (2) Fire suppression factor (3)
---	---	---

H1 Mobile Property Involved ☐ None 1 ☐ Not involved in ignition, but burned 2 ☐ Involved in ignition, but did not burn 3 ☒ Involved in ignition and burned	H2 Mobile Property Type & Make 11 Passenger car. Mobile property type FO Ford Mobile property make	Local Use ☐ Pre-Fire Plan Available Some of the information presented in this report may be based upon reports from other Agencies ☐ Arson report attached ☐ Police report attached ☐ Coroner report attached ☐ Other reports attached
--	---	--

Escape Mobile property model	2002 Year
SCV 559 License Plate Number	MI 1FMCU04112K State VIN Number

NFIRS-2 Revision 01/19/99



January 5, 2005

Ford Motor Company
Attn: Consumer Affairs
16800 Executive Plaza Dr.
Dearborn, MI 48126-4207

RE: Claim Number: [REDACTED]
Date of Loss: 12/30/2004
Insured: [REDACTED]
Vehicle: 2002 Ford Escape
VIN: 1FMC04112K [REDACTED]

To Whom It May Concern:

On December 30, 2004, our insured vehicle sustained fire damage. On the date of the loss, this property was insured by Citizens Insurance Company of America under policy number [REDACTED]. We are currently conducting an investigation of the loss and pursuing any potential claim we may have against any and all parties who may have had some connection with the loss.

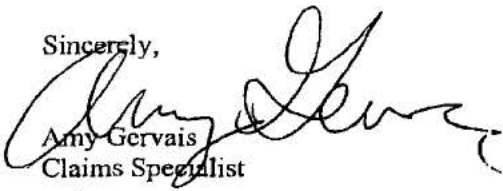
Our preliminary investigation reveals that Ford Motor Company is responsible in some way for the damages to our insured's property.

Please be advised that you are hereby afforded an opportunity to inspect the damage. The vehicle is currently located at the following address:

Fleet Auto Body
18935 Cory St.
Riverview, MI
734 283 2450

If you wish to inspect these damages, please notify me immediately. We will extend our offer until January 14, 2005.

Sincerely,


Amy Gervais
Claims Specialist

CC: Herndon & Associates

1:44:59 PM

01-03-2005

VINassist(R) Version 1.26

(c) by NICB 1991

Law Enforcement Edition

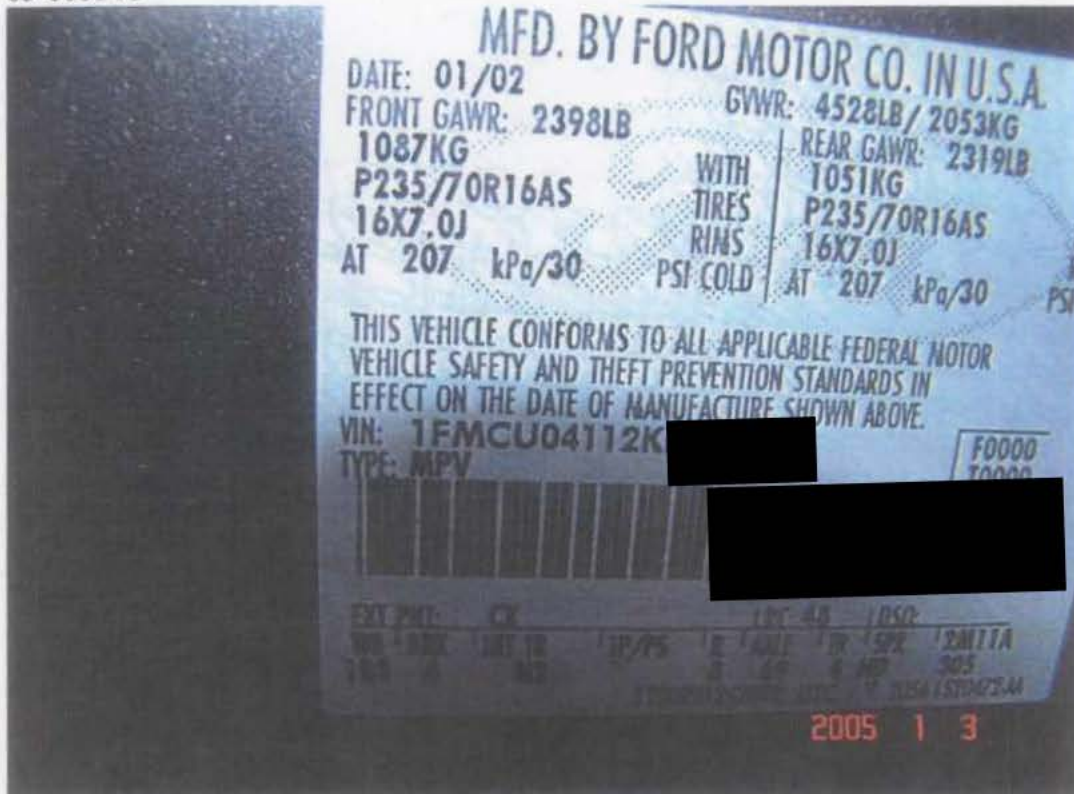
VIN:1FMCU04112K

DIGIT	DESCRIPTION	MEANING
1	Country of Origin	UNITED STATES
F	Manufacturer	FORD FORD
M	Vehicle Type	MULTI PURPOSE VEHICLE
C	Gross Vehicle Weight	4001-5000 GVWR W/SEC.GEN ARBGS+SIDE
U04	Series	ESCAPE XLT 4X4 5-DOOR
1	Engine	3.0 SEFI-DOHC V6/5.9 I6 DSL CUM ISB
1	Check Digit	CHECK DIGIT VALID
2	Year	2002
K	Assembly Plant	KANSAS CITY: CLAYCOMO, MO
B75591	Sequence Number	IN RANGE

***** VIN Passed Test *****

VIN indicates a 2002 FORD ESCAPE XLT 4X4 5-DOOR

(c) by NICB, 1991



1. A view of the Federal Manufacturers Label located on the pillar post behind the driver's door.
2. A view of the vehicle from the front.





3. A view of the vehicle from the left front.

4. A view of the vehicle, driver's side front.





5. A view of the vehicle, driver's side rear.

6. A view of the left rear of the vehicle.





7. A view of the rear of the vehicle.

8. A view of the right rear of the vehicle.





9. A view of the passenger's side rear.

10. A view of the passenger's side front.





11. A view of the right front of the vehicle.

12. A view of the contents of the cargo compartment.





13. A view of the contents of the blue rubbermade container within the cargo compartment.

14. A view of the fuel filler neck and cap, left rear.





15. A view of the backseat from the driver's side.

16. A view of the front seat from the driver's side.





17. A view of the oil change sticker located on the windshield on the driver's side.

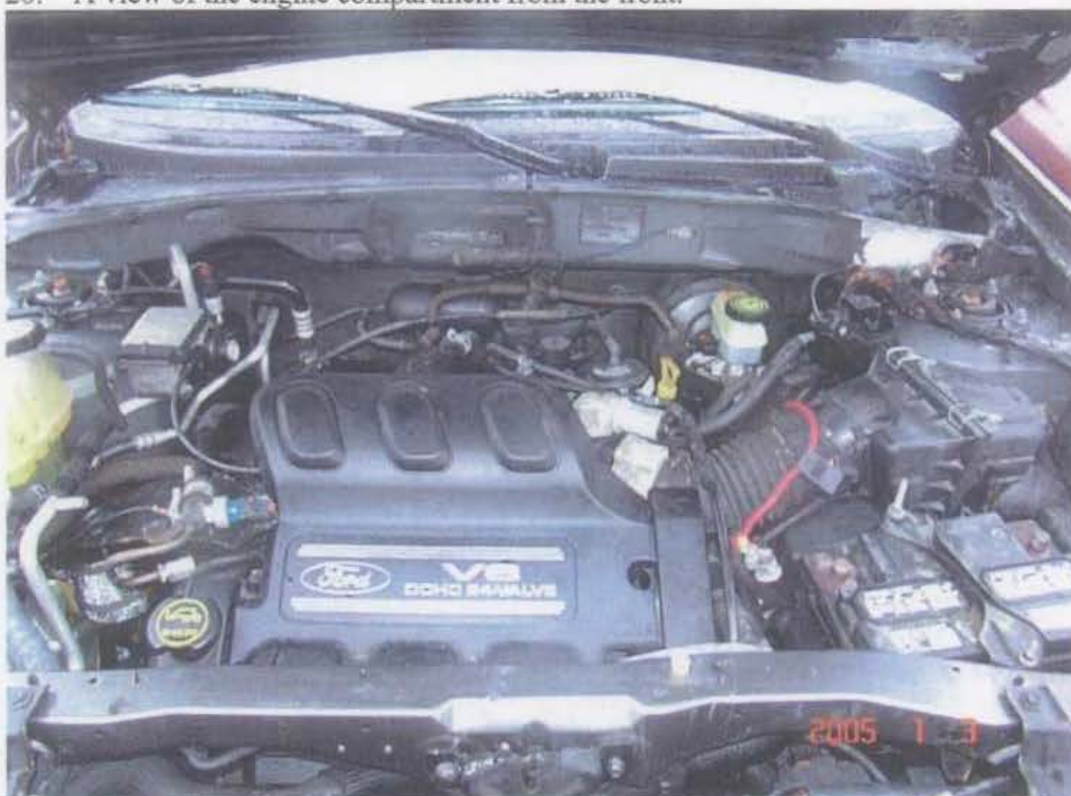
18. A view of the dashboard on the driver's side.

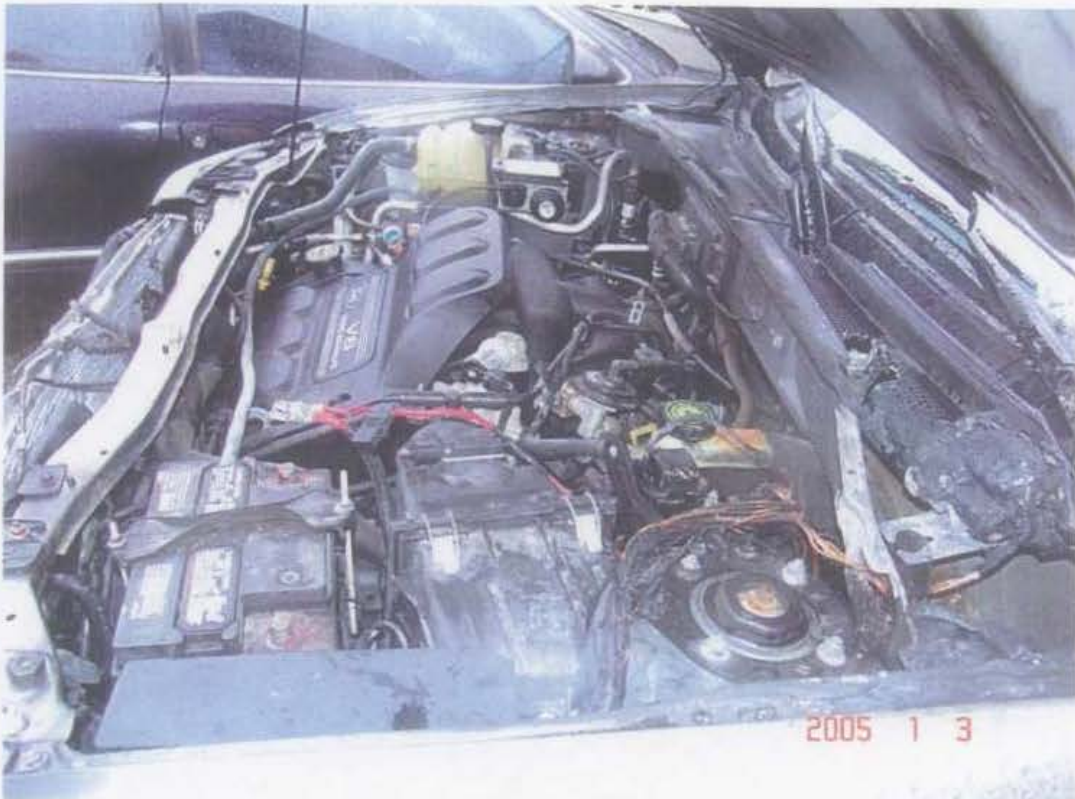




19. A view of the dashboard from the passenger's side.

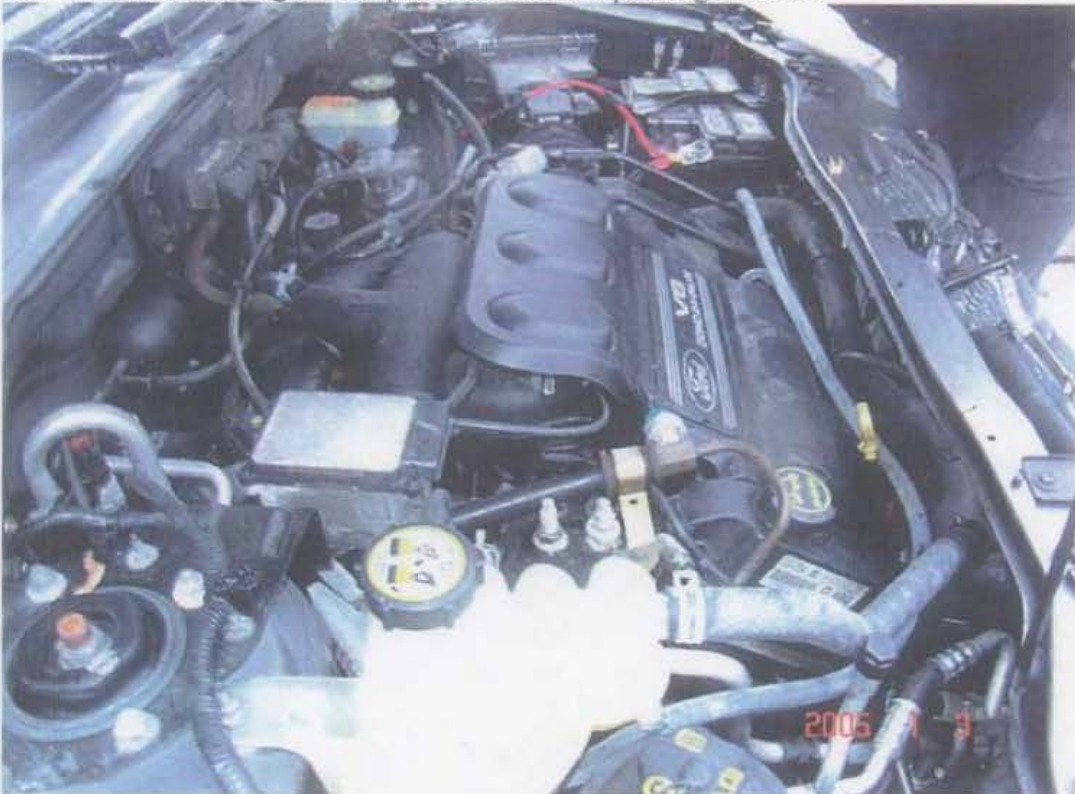
20. A view of the engine compartment from the front.





21. A view of the engine compartment from the driver's side.

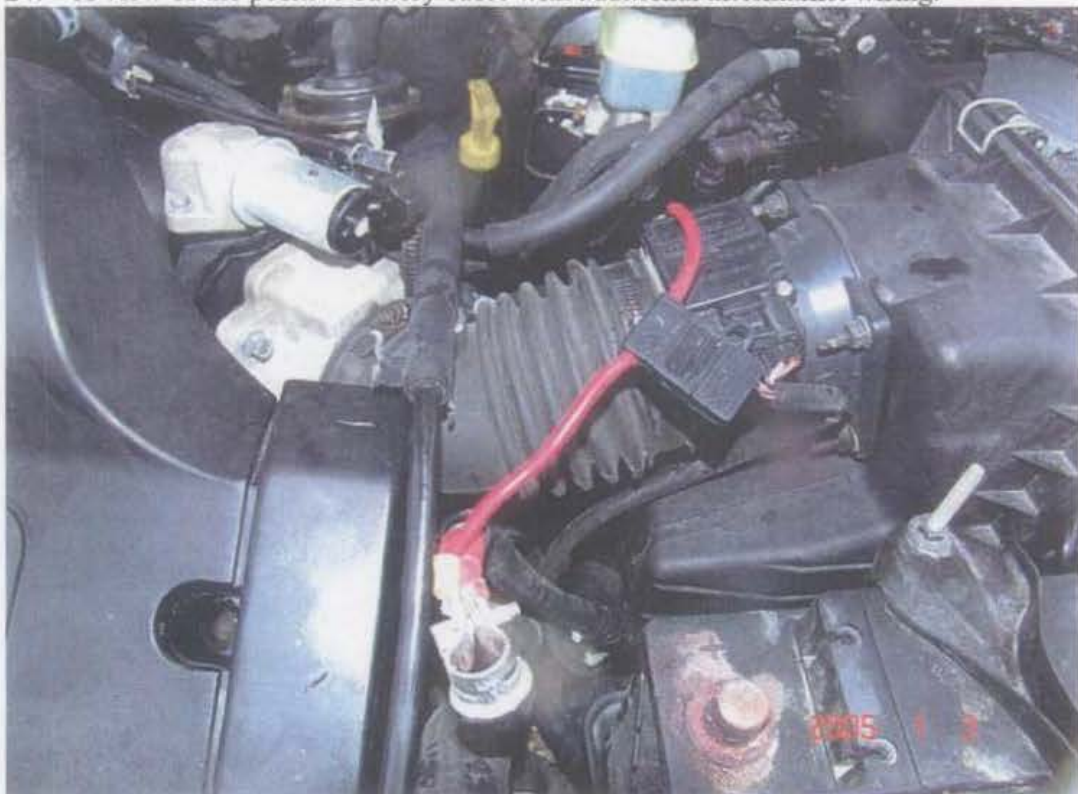
22. A view of the engine compartment from the passenger's side.





23. A view of the battery located on the engine compartment, driver's side front.

24. A view of the positive battery cable with additional aftermarket wiring.





25. A view of the inline fuse located within the aftermarket wiring.

26. A view of the 40-amp inline fuse removed from the harness.

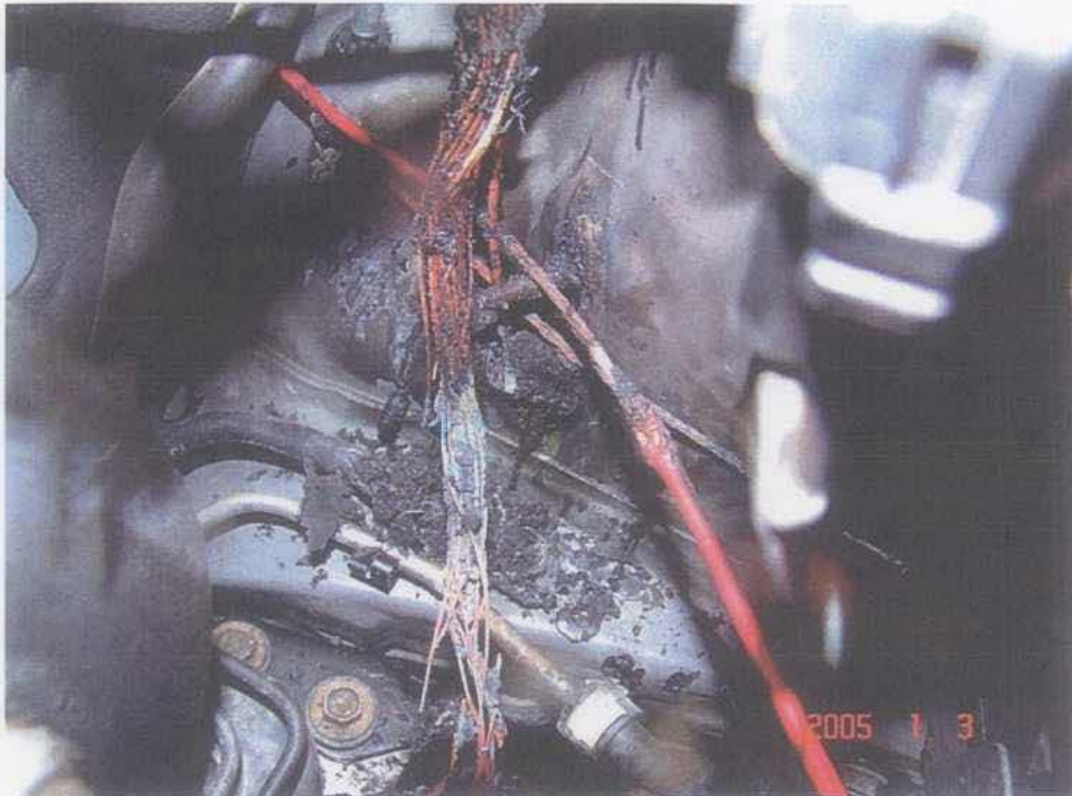




27. A view of the aftermarket wiring heading towards the brake wall on the driver's side.

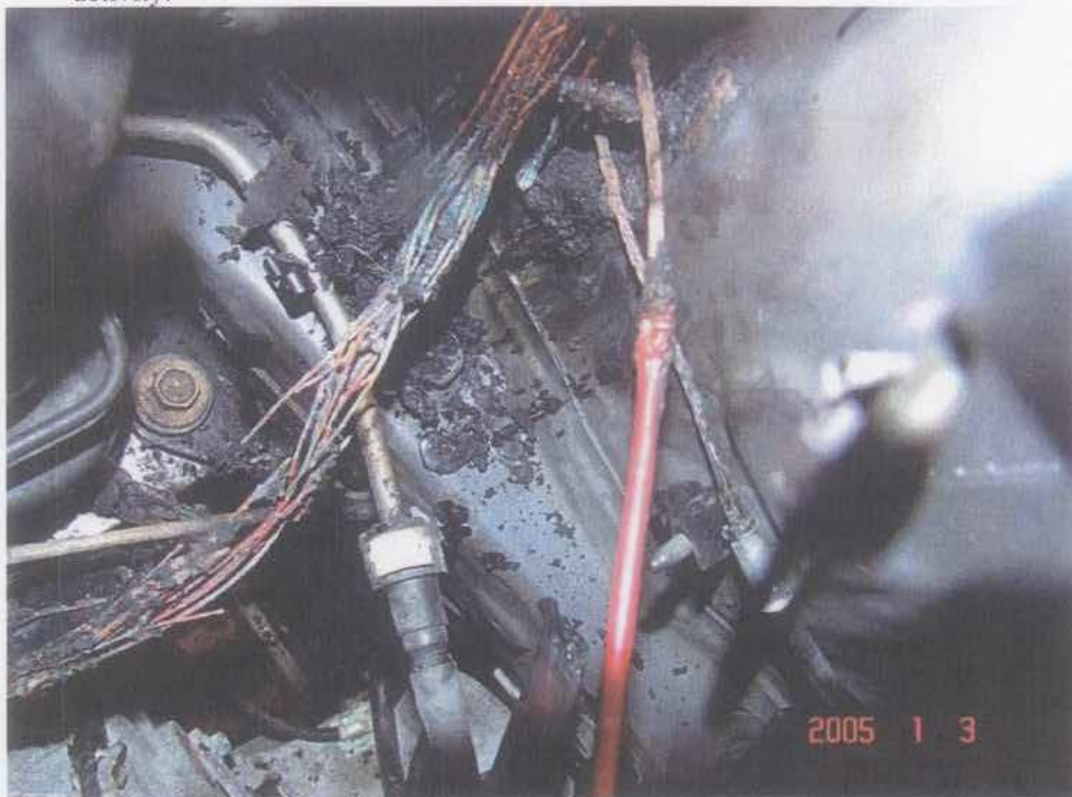
28. A view of the digital odometer reading 31,390 miles.

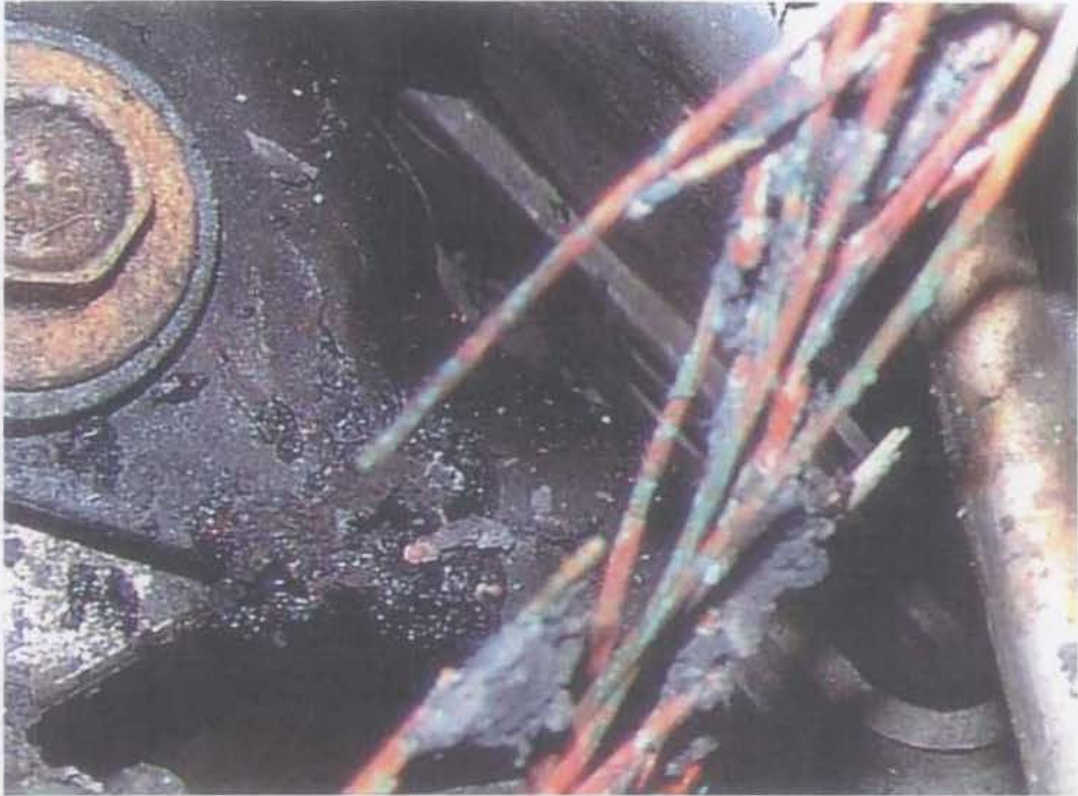




29. A view of the aftermarket wiring leaning up against a bolt coming out of the shock tower.

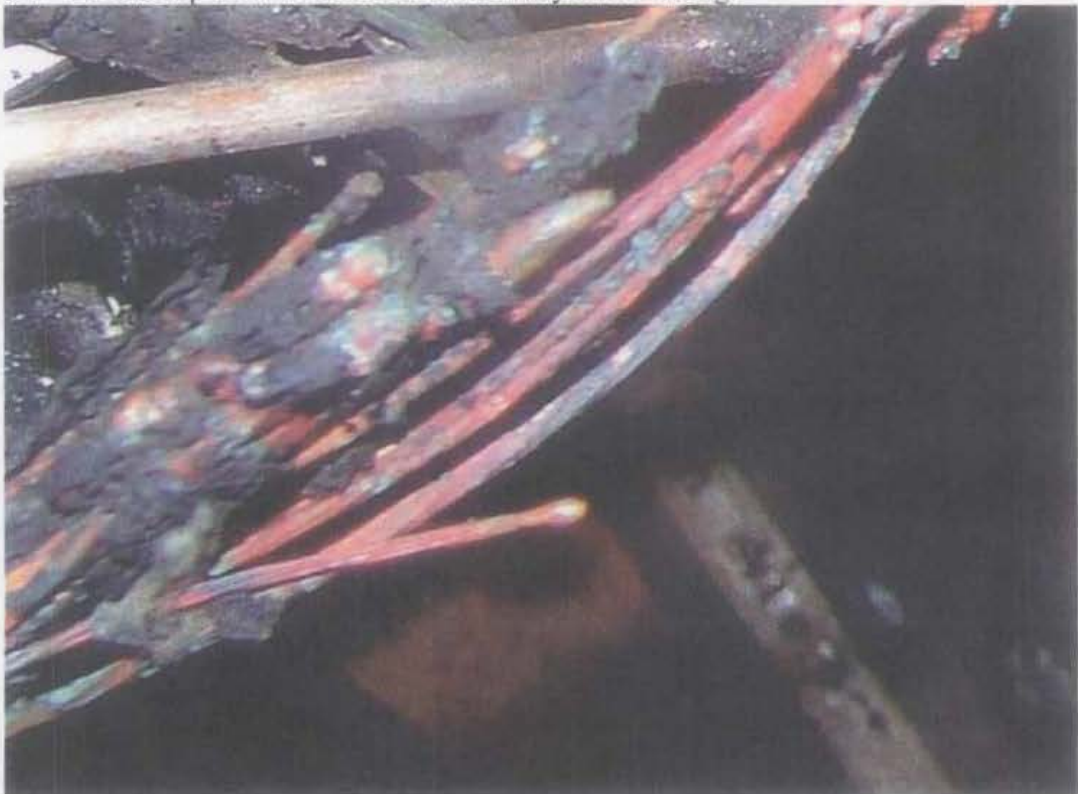
30. A view of the electrical wiring on the driver's side shock tower with electrical activity.





31. A close-up view of the electrical activity in the wiring.

32. A close-up view of the electrical activity in the wiring.





33. A view of the electrical wiring factory harness top of the shock tower, driver's side of the engine compartment.

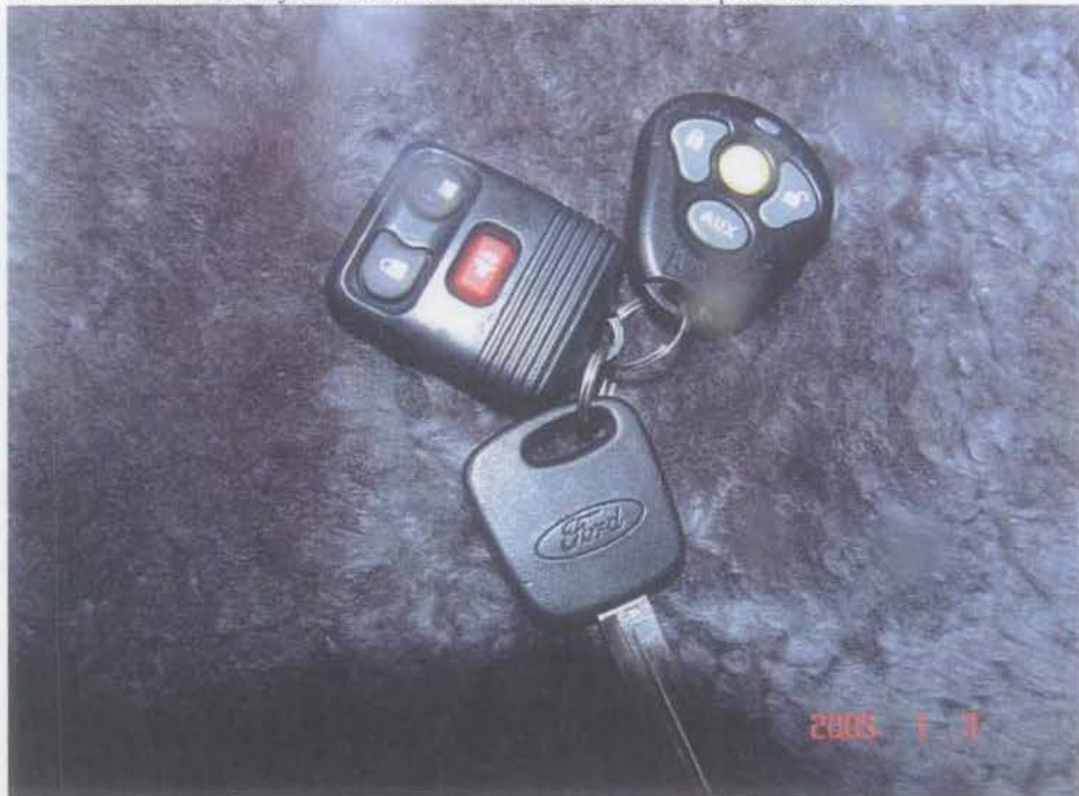
34. A view of the red aftermarket wiring coming into the passenger compartment through the brake wall.

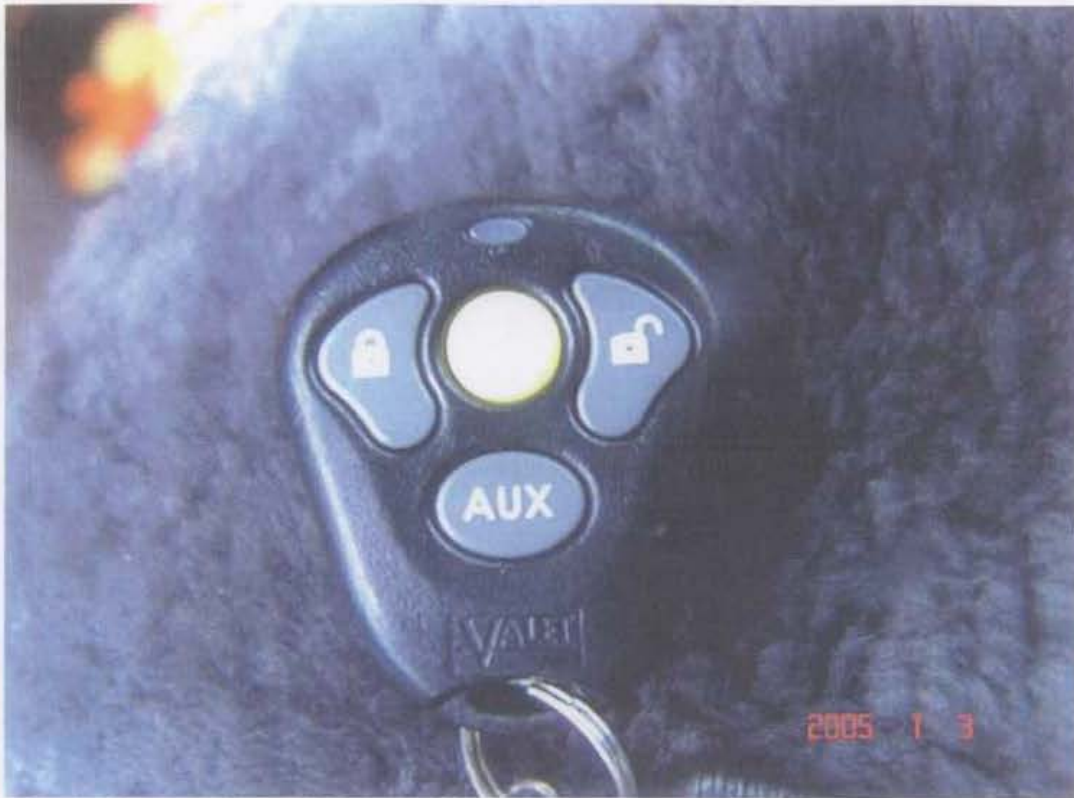




35. A view of the aftermarket remote start unit marked 555U.

36. A view of the key and fobs that were in the vehicle upon arrival.





37. A close-up view of the valet fob.

38. Rear side of the valet fob.





39. A view of the Kenwood KDC2022 aftermarket stereo system in the dash.

40. A view of the underside of the hood.

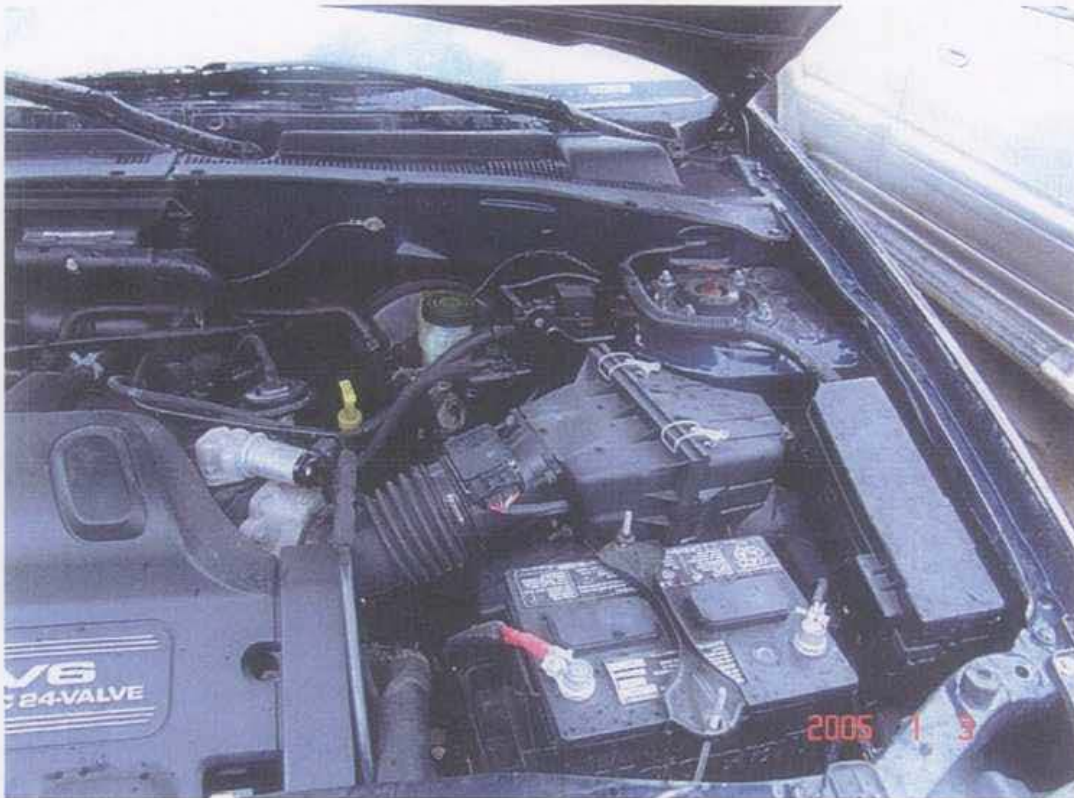




41. A view of the engine compartment on the driver's side rear.

42. A view of the hood with burn mark, driver's side rear.





43. A view of the exemplar vehicle's engine compartment on the driver's side.

44. A view of the wiring harness on top of the shock tower, left side.





45. A view of the wire and plastic harness, shock tower, front of the driver's side.

46. A view of the wiring harness and along the rear of the shock tower driver's side.





47. Additional view of wiring harness along the rear of the shock tower.

48. Front view of the factory wiring harness along the shock tower.





ISSUE LIST

Last Handling Date/ Issue Status	Name/ Reason Desc	Vin/ Case No.	Model Year and Vehicle Line	Issue Type
5/16/2005 CLOSED	[REDACTED] MISC INQUIRY - FORD MOTOR COMPANY FEEDBACK	1FMYU04172K [REDACTED] 1625431155	2002 ESCAPE	02
4/29/2005 CLOSED	[REDACTED] LEGAL - CUSTOMER WAITING FOR ACKNOWLEDGEMENT	1FMYU04172K [REDACTED] 1625431155	2002 ESCAPE	02
4/27/2005 CLOSED	[REDACTED] CAC RELATED - F/M CSR FOLLOWING CONTACT	1FMYU04172K [REDACTED] 1625431155	2002 ESCAPE	02
4/26/2005 CLOSED	[REDACTED] LEGAL - ACCIDENT / FIRE	1FMYU04172K [REDACTED] 1625431155	2002 ESCAPE	07

6/13/2005

PE06-048-0252LC

All Action Details for Issue

Print

VIN: 1FMYU04172K [REDACTED] Year: 2002
Name: [REDACTED] Owner Status: Subsequent
Symptom Desc: GENERAL INQUIRIES REQUEST/NON-VEHICLE RELATED
Reason Desc: MISC INQUIRY - FORD MOTOR COMPANY FEEDBACK
Issue Type: 02 INFORMATION Issue Status: CLOSED

Model: ESCAPE Case: [REDACTED]
WSD: 2002-05-14
Primary Phone: [REDACTED]
Secondary Phone: [REDACTED]

Action: ADVISE CUSTOMER THE FEEDBACK HAS BEEN DOCUMENTED

Dealer:

Odometer: 58000 MI

Analyst Name: MARCELLE JOANNE

Action Date: 05/16/2005

Comm Type: PHONE

Analyst: JMARCEL5

Action Time: 14.19.53.183

Origin Desc: US INQUIRY CASE BASE

Action Data: No

Comments CUSTOMER SAID: =CUST SAYS HAVE AN AFTERMARKET WARRANTY COMPLETE CARE.=CUST SAYS NO LONGER HAD THE ESCAPE MODLE IT CAUGHT ON FIRE.=CUST SAYS BOUGHT ANOTHER MODLE VEH AND WAS NOT PLEASED WITH THE WHICH FORD HANDLE THE MATTER WITH THE ESCAPE.=CUST SAYS NORMAL PURCHASE FOR TRUCKS FOR HIS COMPANY AND MAY CONTINUE TO DO SO, HOWEVER WANTED TO KNOW IF FORD HAD ANYTHING DIFFERENT TO SAY REGARDING THE LOST OF THE ESCAPE VEH.=CUST SAYS WANTED TO INFORM FORD ON THIS MATTER THAT NO ONE CONTACTED HIM ON THIS MATTER.=CUST SAYS INSURANCE CO IS INVESTIGATING THIS MATTER.CRC ADVISED: THANK YOU FOR PROVIDING FORD MOTOR COMPANY WITH FEEDBACK; YOUR OPINIONS ARE VALUABLE TO US. I HAVE DOCUMENTED YOUR COMMENTS AND THE INFORMATION YOU PROVIDED REGARDING YOUR EXPERIENCE WITH OUR COMPANY. YOU WILL NOT BE CONTACTED UNLESS A SPECIFIC DEPARTMENT REQUIRES ADDITIONAL INFORMATION OR CLARIFICATION.==CSR ADVISED CUST OF THE ABOVE INFO.

6/13/2005

PE06-048-0253LC

All Action Details for Issue

Print

VIN: 1FMYU04172K [REDACTED]
Name: [REDACTED]
Symptom Desc: GENERAL INQUIRIES REQUEST/NON-VEHICLE RELATED
Reason Desc: LEGAL - CUSTOMER WAITING FOR ACKNOWLEDGEMENT
Issue Type: 02 INFORMATION

Year: 2002
Owner Status: Subsequent
Issue Status: CLOSED

Model: ESCAPE Case: [REDACTED]
WSD: 2002-05-14
Primary Phone: [REDACTED]
Secondary Phone: [REDACTED]

Action: CB-IT MAY TAKE 7 DAYS FOR CONSUMER AFFAIRS TO BEGIN INVESTIGATE

Dealer: 03676 RIVERHEAD MOTORS, INC.

Origin Desc: US CONCERN CASE BASE

Odometer: 58000 MI

Comm Type: PHONE

Analyst Name: NARAYAN PRABHA

Analyst: PNARAYA4

Action Date: 04/29/2005

Action Time: 11.15.14.837

Action Data: No

Comments CUSTOMER SAID: *** ATTN : SAME ISSUE AS IN HISTORICAL ***- CUST STILL AWAITING A RESPONSE FROM THE LEGAL DEPT.- CUST WAS ADVISED HE WILL RECEIVE A RESPONSE IN 2 BUSINESS DAYS.- CUST WILL PURSUE LEGAL ACTION IF HE DOES NOT GET A RESPONSE IN 4 HOURS. CSR ADVISED: THANK YOU FOR CONTACTING US IN RELATION TO YOUR ONGOING CASE. CONSUMER AFFAIRS INVESTIGATIONS MAY TAKE UP TO 7 DAYS TO INITIATE. LET ME ASSURE YOU THAT THIS TYPE OF SITUATION IS A HIGH PRIORITY FOR FORD MOTOR COMPANY. I HAVE VERIFIED YOUR CONTACT INFORMATION TO ENSURE WE CAN CONTACT YOU WHEN FURTHER INFORMATION IS AVAILABLE OR REQUIRED.*** AS PER TL GINA...CSR ADVISED CUST AS PER LPA COMMENTS- LPA REVIEWED FILE UNIT IS BEYOND WARRANTY AND NOT INVOLVED IN RECALL 05S28..THIS IS AN INSURANCE ISSUE THEY CAN SUBROGATE FORD IF THEY CHOOSE.*** CSR PRINTED ISSUE & ESCALATED TO TL GINA FOR FURTHER HANDLING ***

6/13/2005

PE06-048-0254LC

All Action Details for Issue

Print

VIN: 1FMYU04172K [REDACTED]
Name: [REDACTED]
Symptom Desc: GENERAL INQUIRIES REQUEST/NON-VEHICLE RELATED
Reason Desc: CAC RELATED - F/M CSR FOLLOWING CONTACT
Issue Type: 02 INFORMATION

Year: 2002
Owner Status: Subsequent
Issue Status: CLOSED

Model: ESCAPE Case: [REDACTED]
WSD: 2002-05-14
Primary Phone: [REDACTED]
Secondary Phone: [REDACTED]

Action: CALLBACK ADD ADDITIONAL COMMENTS
Dealer: 03676 RIVERHEAD MOTORS, INC.

Origin Desc: US CONCERN CASE BASE

Odometer: 58000 MI

Comm Type: PHONE

Analyst Name: PAUL REHANA

Analyst: PREHANA

Action Date: 04/27/2005

Action Time: 14.50.29.007

Action Data: No

Comments CUSTOMER SAID: - CUST HAD CALLED CRC ON MON REG VEH CATCHING FIRE- CUST WAS SUPPOSED TO HEAR FROM CONSUMER AFFAIRS- SEEKING STATUS OF F/DEALER SAID: RIVERHEAD MOTORS, INC. 1655 OLD COUNTRY ROAD RIVERHEAD, NY 11901 TEL: (631) 727-2200 CRC ADVISED: PLEASE ALLOW THE REQUESTED TIME FOR THE FOLLOW UP TO OCCUR SO THAT YOUR ISSUE MAY BE PROPERLY ADDRESSED.

Action: CALLBACK ADD ADDITIONAL COMMENTS
Dealer: 03676 RIVERHEAD MOTORS, INC.

Origin Desc: US CONCERN CASE BASE

Odometer: 58000 MI

Comm Type: PHONE

Analyst Name: PAUL REHANA

Analyst: PREHANA

Action Date: 04/27/2005

Action Time: 14.50.29.246

Action Data: No

Comments CUSTOMER SAID: - CUST HAD CALLED CRC ON MON REG VEH CATCHING FIRE- CUST WAS SUPPOSED TO HEAR FROM CONSUMER AFFAIRS- SEEKING STATUS OF F/DEALER SAID: RIVERHEAD MOTORS, INC. 1655 OLD COUNTRY ROAD RIVERHEAD, NY 11901 TEL: (631) 727-2200 CRC ADVISED: PLEASE ALLOW THE REQUESTED TIME FOR THE FOLLOW UP TO OCCUR SO THAT YOUR ISSUE MAY BE PROPERLY ADDRESSED.

Action: CALLBACK ADD ADDITIONAL COMMENTS
Dealer: 03676 RIVERHEAD MOTORS, INC.

Origin Desc: US CONCERN CASE BASE

Odometer: 58000 MI

Comm Type: PHONE

Analyst Name: PAUL REHANA

Analyst: PREHANA

Action Date: 04/27/2005

Action Time: 14.50.29.773

Action Data: No

Comments CUSTOMER SAID: - CUST HAD CALLED CRC ON MON REG VEH CATCHING FIRE- CUST WAS SUPPOSED TO HEAR FROM CONSUMER AFFAIRS- SEEKING STATUS OF F/DEALER SAID: RIVERHEAD MOTORS, INC. 1655 OLD COUNTRY ROAD RIVERHEAD, NY 11901 TEL: (631) 727-2200 CRC ADVISED: PLEASE ALLOW THE REQUESTED TIME FOR THE FOLLOW UP TO OCCUR SO THAT YOUR ISSUE MAY BE PROPERLY ADDRESSED.

6/13/2005

PE06-048-0255LC

All Action Details for Issue

Print

VIN: 1FMYU04172K [REDACTED] Year: 2002
Name: [REDACTED] Owner Status: Subsequent
Symptom Desc: FIRE/SMOKE VISIBLE FLAME UNDERHOOD
Reason Desc: LEGAL - ACCIDENT / FIRE
Issue Type: 07 LEGAL Issue Status: CLOSED

Model: ESCAPE Case: [REDACTED]
WSD: 2002-05-14
Primary Phone: [REDACTED]
Secondary Phone: [REDACTED]

Action: ADVISE CUST INFORMATION WILL BE SENT TO CONSUMER AFFAIRS - FIRE

Dealer: 03676 RIVERHEAD MOTORS, INC.

Origin Desc: US CONCERN CASE BASE

Odometer: 58000 MI

Comm Type: PHONE

Analyst Name: MARCELLE JOANNE

Analyst: JMARCEL5

Action Date: 04/25/2005

Action Time: 17.21.54.666

Action Data: No

Comments CUSTOMER SAID: =CUST SAYS TURN THE VEH OFF AND OPENED THE FRONT DOOR AND THE VEH CAUGHT ON FIRE VISABLE FLAMES FROM UNDER THE HOOD.=CUST SAYS THE FIRE DEPT DID COME OUT RIGHT A REPORT ON THE MATTER.=CUST SAYS FIRE DEPT RAN THE VIN AND STATED THAT THE VEH WAS INVOLVED IN RECALL FOR THE FIRE HARZARDS.=CUST SAYS THE POLICE DEPT WAS OUT TOOK REPORT AS WELL.=CUST SAYS INSURANCE CO NOTIFIED.=CUST SAYS DID SMELL SMOKE ODOR FROM UNDER THE HOOD YEATERDAYS AND LAST NIGHT.=CUST SAYS VEH CAUGHT ON FIRE TODAY.1 :20 AND 1:25 PM=CUS SAYS NO ONE WAS HURT=CUST SAYS THE VEH IS STILL WITH CUST.=CUST SAYS IS CONTACTING FORD ON THE MATTER TODAY.BELIEVES THAT THE VEH CAUGHT ON FIRE DUE TO A DEFECT.=====CUST SAYS DID TAKE THE VEH TO OTIS FORD FOR A NO START CONCERN AND DID TAKE THE VEH TO RIVERHEAD FORD AND THEY COULD NOT FIND THE PROBLEM.=====DEALER SAID: RIVERHEAD MOTORS, INC. 1655 OLD COUNTRY ROADRIVERHEAD, NY 11901PHONE: 631-727-2200CRC 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.==CSR ADVISED CUST OF THE ABOVE INFO.==

Action: SEND ACKNOWLEDGEMENT LETTER TO CUSTOMER

Dealer: 03676 RIVERHEAD MOTORS, INC.

Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION

Odometer: 58000 MI

Comm Type: MAIL

Analyst Name: VALMA SANDERS
(VSANDERS)

Analyst: VSANDERS

Action Date: 04/26/2005

Action Time:
14.50.01.563

Action Data: No

Comments LPA REVIEWED FILE UNIT IS BEYOND WARRANTY AND NOT INVOLVED IN RECALL 05S28..THIS IS AN INSURANCE ISSUE THEY CAN SUBROGATE FORD IF THEY CHOOSE

Action: DENY ASSISTANCE - BEYOND WARRANTY

Dealer: 03676 RIVERHEAD MOTORS, INC.

Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION

Odometer: 58000 MI

Comm Type: MAIL

Analyst Name: VALMA SANDERS
(VSANDERS)

Analyst: VSANDERS

Action Date: 04/26/2005

Action Time:
14.50.30.889

Action Data: No

Comments SEE PREV COMMENTS..

6/13/2005

PE06-048-0256LC

PEERLESS INSURANCE

Member Liberty Mutual Group



P.O. Box 4858
Syracuse, New York 13221
315-431-6100

May 3, 2005

[REDACTED]
Calverton, NY
[REDACTED]

Re: Owner: [REDACTED]
Vehicle: 2002 Ford Escape
Vin #: 1FMYU04172K [REDACTED]
Claim Number: [REDACTED]
Date of Loss: April 25, 2005

Dear Insured:

This letter confirms our offer on the above vehicle.

As you know our appraiser has viewed the damages to your vehicle and determined it to be a total loss. We have enclosed a copy of the total loss evaluation for your review.
We determined our offer:

ACV:	14955.00
Tax (8.75%):	1308.56
Tag & Title Fee:	12.75
Deductible:	1000.00
Total Settlement Amount:	15276.31

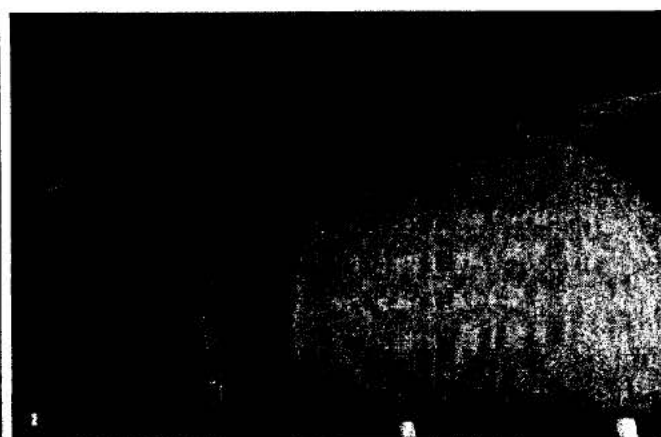
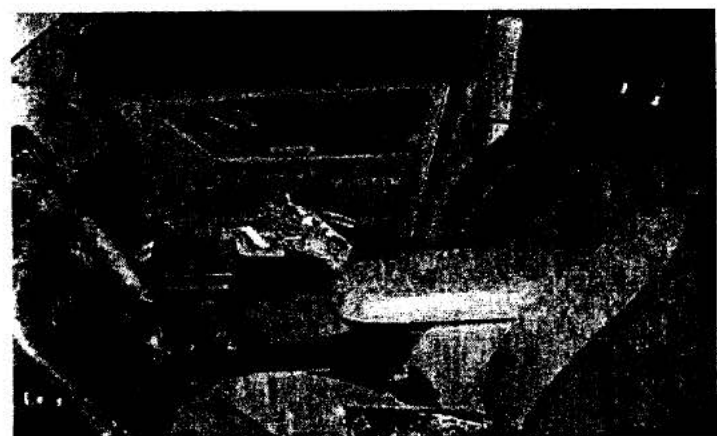
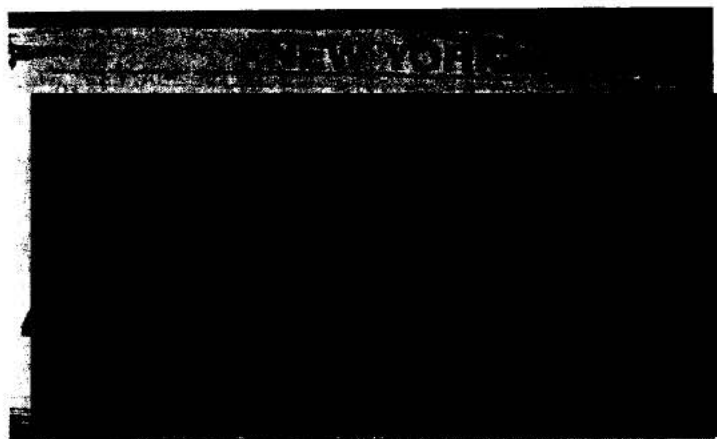
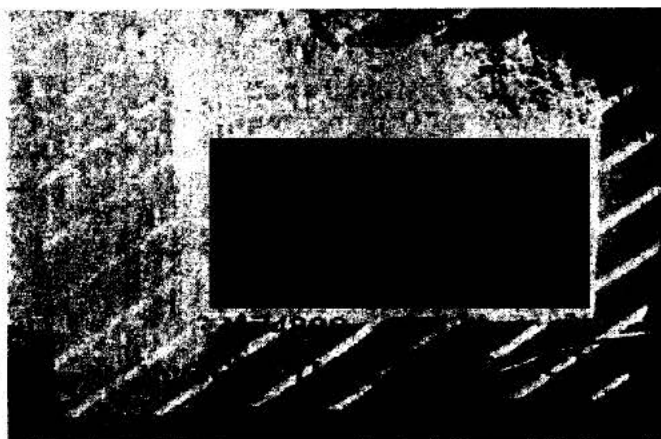
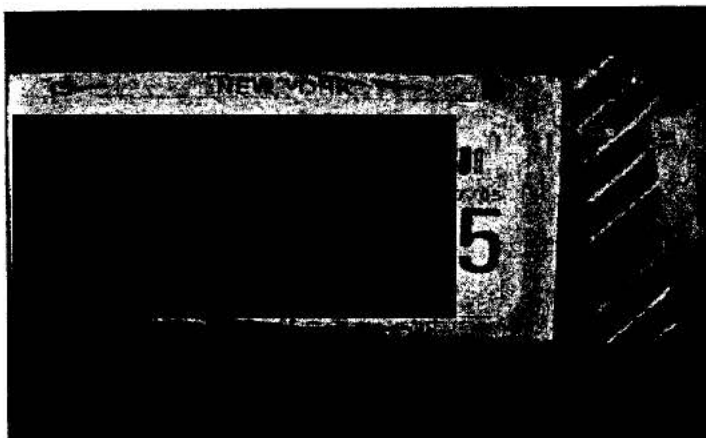
Please keep in mind, we need your **signed title**, any remaining **keys**, any **original lien releases** prior to any payments being issued. If there is a lien on the vehicle, we will need the lien holder name, telephone number, and loan number for that vehicle so that we can make arrangements to pay the lien. I also ask that you also contact the lien holder and advise them Peerless Insurance will be in contact with them regarding payment on the loan. In addition if you have any outstanding bills as a result of this loss, please forward to me for reimbursement consideration.

Thank you for your cooperation in this matter, if you have any questions please feel free to contact me at 1-800-443-4000 x6150.

Sincerely,

Tracy Hildebrandt
Claim Representative

PE06-048-0257LC

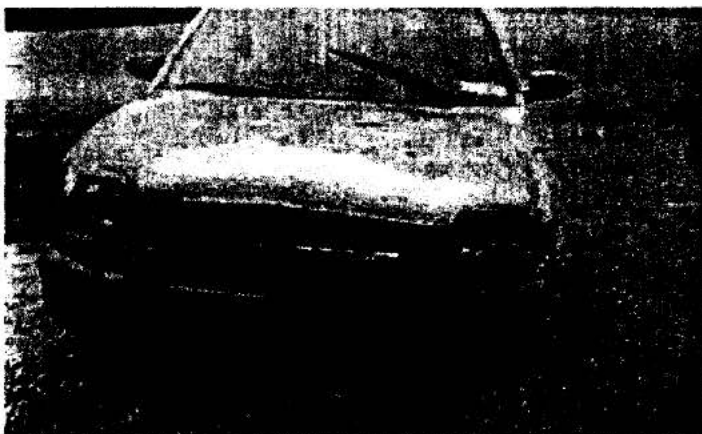
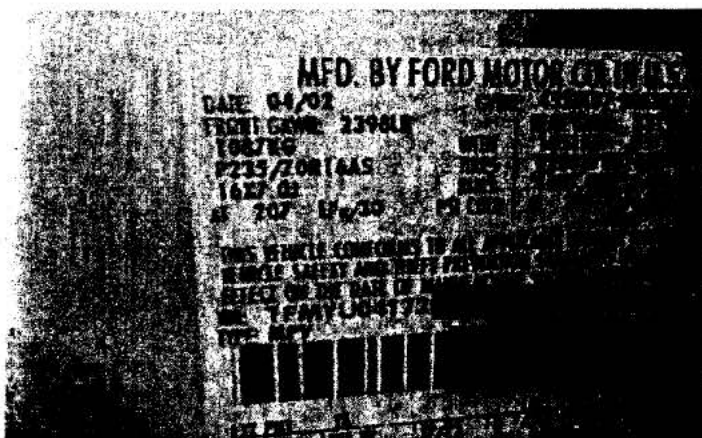


SCA APPRAISAL COMPANY
P.O. Box 1455, Burbank CA 91507 -

Client: [REDACTED]
Examiner: LAWLEE, KARA
Claim Number: [REDACTED]

Owner: [REDACTED]
Vehicle/Property: 2002 FORD ESCAPE XLY
VIN: [REDACTED]

Appraiser: Starr, John
File Number: 66161



SCA APPRAISAL COMPANY
 P.O. Box 1455, Burbank CA 91507 -

Client: [REDACTED]
 Examiner: LAWLEE, KARA
 Claim Number: [REDACTED]

Owner: [REDACTED]
 Vehicle/Property: 2002 FORD ESCAPE XLY
 VIN: [REDACTED]

Appraiser: Starr, John
 File Number: 66161



SCA APPRAISAL COMPANY
P.O. Box 1455, Burbank CA 91507 -

Client: [REDACTED]
Examiner: LAWLEE, KARA
Claim Number: [REDACTED]

Owner: [REDACTED]
Vehicle/Property: 2002 FORD ESCAPE XLY
VIN: [REDACTED]

Appraiser: Starr, John
File Number: 66161

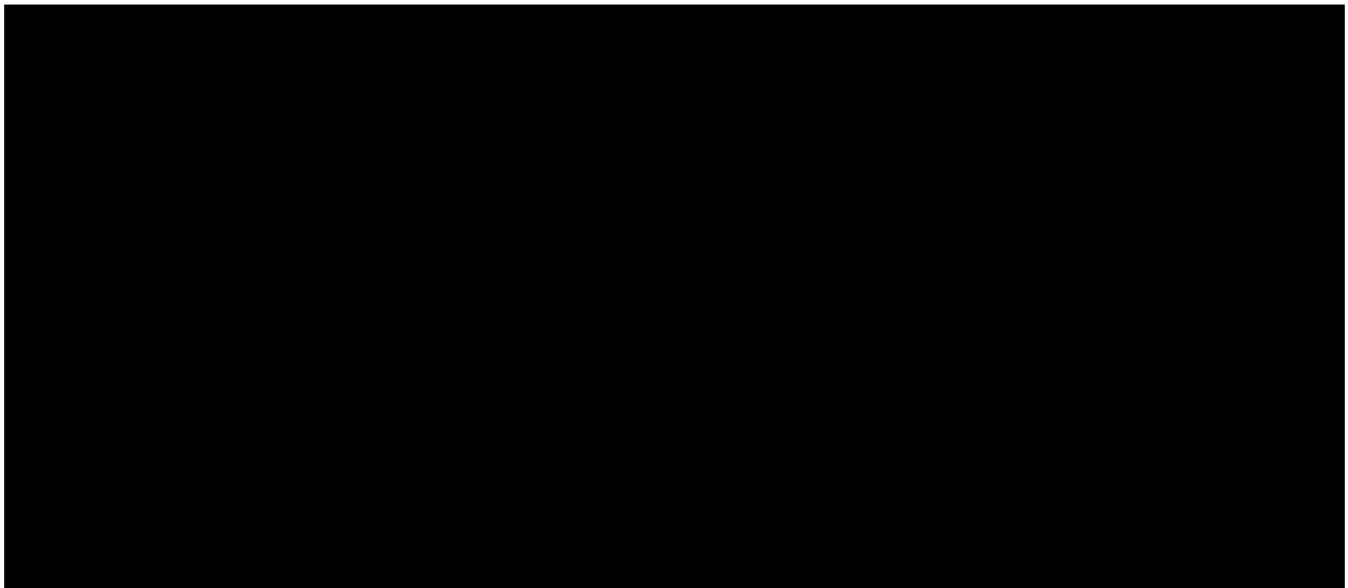


SCA APPRAISAL COMPANY
P.O. Box 1455, Burbank CA 91507 -

Client: [REDACTED]
Examiner: LAWLEE, KARA
Claim Number: [REDACTED]

Owner: [REDACTED]
Vehicle/Property: 2002 FORD ESCAPE XLT
VIN: [REDACTED]

Appraiser: Starr, John
File Number: 66161



AFFIDAVIT OF VEHICLE FIRE or VEHICLE THEFT

Failure to answer all questions may delay settlement of your claim and/or could cause interruption of your rental vehicle authorization. If a question is not applicable to your loss, simply annotate "N/A". Making false statements could also jeopardize the processing of your claim.

SECTION I - INSURED INFORMATION

NAME: [REDACTED] ALIAS / NICKNAMES: [REDACTED]
ADDRESS: [REDACTED]
CITY: EL Paso STATE: TX ZIP CODE: [REDACTED]
HOW LONG HAVE YOU LIVED AT THIS ADDRESS? 3 mo's
PHONE / CELL PHONE NUMBER - DAYTIME: [REDACTED]
PHONE / CELL PHONE NUMBER - EVENING/WEEKEND: [REDACTED]
DATE OF BIRTH: [REDACTED] SOCIAL SECURITY NUMBER: [REDACTED]
DRIVER'S LICENSE NUMBER: [REDACTED] STATE: TX EXPIRES: 02/25/06
MARITAL STATUS: Divorced
NUMBER OF DEPENDENTS: 2 TOTAL NUMBER OF DRIVERS IN HOUSEHOLD: 1
NAME OF OTHER PERSONS RESIDING WITH YOU AT TIME OF LOSS: [REDACTED] - son
[REDACTED] - daughter
YOUR OCCUPATION: Pt Accounts - Collections NUMBER OF YEARS: 7 mo's
NAME / ADDRESS / PHONE NUMBER OF EMPLOYER: Physicians Hospital
1416 George Dieter
EL Paso, TX 79936 (915) 849-5442
SPOUSE'S NAME: N/A ALIAS OR NICKNAMES: N/A
ADDRESS (ONLY IF DIFFERENT THAN ABOVE): N/A

ADDITIONAL PHONE NUMBERS: N/A
DATE OF BIRTH: / NA / SOCIAL SECURITY NUMBER: - NA -
DRIVER'S LICENSE NUMBER: N/A STATE: NA EXPIRES: / NA /
SPOUSE'S OCCUPATION: N/A NUMBER OF YEARS: N/A
NAME / ADDRESS / PHONE NUMBER OF SPOUSE'S EMPLOYER: N/A

GROSS ANNUAL INCOME FOR HOUSEHOLD: \$ 22,500 (Include Spouse, Child Support, Etc.)

- () YES (☒) NO Does any driver of this vehicle have a physical or emotional impairment that would diminish his or her ability to drive?
() YES (☒) NO Does any driver of this vehicle have a license restriction (other than glasses)?
() YES (☒) NO Has any driver been convicted of a criminal offense?
() YES (☒) NO Have you, or any member of your household, filed bankruptcy or had repossessions or judgments within the past 5 years?
() YES (☒) NO Have you been a resident of your community less than 2 years?
() YES (☒) NO Is unmarried owner or principal driver under age 25? If so, what is the policy number of parents' automobile policy?

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SECTION II - NAME / ADDRESS OF TITLED OWNER(S):

(As noted on Vehicle Title or Registration)

[REDACTED]
[REDACTED]
EL PASO, TX [REDACTED]
[REDACTED]

SECTION III - PRIOR DAMAGE / PRIOR LOSS INFORMATION:

HAD THIS VEHICLE EVER BEEN DAMAGED PRIOR TO THIS LOSS: () YES (✓) NO

IF YES, WHAT WAS THE AMOUNT OF DAMAGES: \$ N/A

IF YES, WERE THOSE DAMAGES REPAIRED: () YES () NO N/A

IF YES, WHO REPAIRED THE DAMAGES: N/A

IF YES, NAME OF INSURANCE COMPANY (If other than Nationwide) THAT HANDLED THAT CLAIM:

N/A

HAVE YOU EVER HAD A VEHICLE STOLEN BEFORE: () YES (✓) NO

IF YES, WHAT WAS THE DATE OF PRIOR THEFT: / N/A /

IF YES, WHAT WAS THE YEAR - MAKE - MODEL OF THE VEHICLE STOLEN:

N/A

IF YES, WAS THE VEHICLE RECOVERED: () YES () NO N/A

IF YES, NAME OF INSURANCE COMPANY (If other than Nationwide) THAT HANDLED THAT CLAIM:

N/A

HAVE YOU EVER HAD A VEHICLE FIRE LOSS BEFORE: () YES (✓) NO

IF YES, NAME OF INSURANCE COMPANY (If other than Nationwide) THAT HANDLED THAT CLAIM:

N/A

NOTE: IF MORE THAN ONE PRIOR THEFT OR PRIOR FIRE LOSS, PLEASE PROVIDE SAME INFORMATION FOR EACH VEHICLE:

N/A

SECTION IV - DETAILS OF THIS TOTAL THEFT LOSS: (✓) Not Applicable

DATE OF THEFT: _____ TIME: _____ () AM () PM

SPECIFIC LOCATION FROM WHICH VEHICLE WAS TAKEN: _____

WHY WAS YOUR VEHICLE AT THIS LOCATION: _____

WHO LEFT THE VEHICLE AT THIS LOCATION: _____

• DID THIS PERSON HAVE PERMISSION TO USE YOUR VEHICLE: () YES () NO

• PHONE NUMBER / ADDRESS (IF DIFFERENT FROM YOURS): _____

• DATE OF BIRTH: ____/____/____ SOCIAL SECURITY NUMBER: ____-____-____

• DRIVER'S LICENSE NUMBER: _____ STATE: _____ EXPIRES: ____/____/____

WERE ALL DOORS LOCKED: () YES () NO

WERE THERE SIGNS OF FORCED ENTRY: () YES (EXPLAIN) _____ () NO

DATE / TIME VEHICLE LAST SEEN: _____ () AM () PM

DATE / TIME THEFT DISCOVERED: _____ () AM () PM

WHO DISCOVERED VEHICLE MISSING: _____

DATE / TIME THEFT REPORTED TO LAW ENFORCEMENT: _____

WHO REPORTED THEFT TO LAW ENFORCEMENT: _____

DEPARTMENT / PRECINCT / PHONE NUMBER OF LAW ENFORCEMENT THEFT WAS REPORTED TO: _____

NAME OF OFFICER WHO RESPONDED: _____

CASE OR REPORT NUMBER FOR THIS REPORTED LOSS: _____

HAVE ANY ARRESTS BEEN MADE, OR ARE THERE ANY SUSPECTS AT THIS TIME: () YES () NO

IF VEHICLE WAS STOLEN AWAY FROM RESIDENCE, HOW DID YOU / DRIVER GET HOME? _____

DID YOU HAVE ANY PERSONAL PROPERTY STOLEN WITH YOUR VEHICLE? () YES () NO

DO YOU HAVE ANY KNOWLEDGE WHO MAY HAVE STOLEN YOUR VEHICLE: () YES () NO

DO YOU HAVE ANY KNOWLEDGE OF THE WHEREABOUTS OF YOUR VEHICLE: () YES () NO

DO YOU HAVE ANY INVOLVEMENT OR ROLE IN THE THEFT OF YOUR VEHICLE: () YES () NO

DO YOU HAVE ANY OTHER INFORMATION YOU BELIEVE IS PERTINENT TO THIS LOSS: () YES () NO

• IF YES TO ANY OF THE FOUR QUESTIONS ABOVE, PLEASE EXPLAIN: _____

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SECTION V - DETAILS OF THIS FIRE LOSS: () Not ApplicableDATE OF FIRE LOSS: 03/10/05 TIME: 12:40 () AM (☒) PMSPECIFIC LOCATION OF VEHICLE AT TIME OF FIRE LOSS: EL Paso, TXWHO LEFT THE VEHICLE AT THIS LOCATION: [REDACTED]WHY WAS YOUR VEHICLE AT THIS LOCATION: My employerWAS THE VEHICLE OCCUPIED AT TIME OF THE FIRE? () YES (☒) NOIF NO, WERE ALL DOORS LOCKED AT TIME OF FIRE? (☒) YES () NOIF NO, WERE ALL WINDOWS ROLLED UP TIGHT AT TIME OF FIRE? (☒) YES () NOIF OCCUPIED AT TIME OF THE FIRE: N/AWAS FIRE FIRST NOTICED BY SMELL OR BY SIGHT? [REDACTED]WHICH SIDE OF THE VEHICLE WAS EXIT MADE FROM? [REDACTED]

WAS ANY DOOR LEFT OPEN AFTER EXITING VEHICLE? () YES () NO

WAS THE IGNITION KEY REMOVED? () YES () NO

WAS THE HOOD RAISED / OPENED? () YES () NO

WAS THE GAS CAP REMOVED? () YES () NO

WAS COLOR WAS THE SMOKE? [REDACTED]

IN WHAT AREA DID THE FIRE START?

(☒) ENGINE COMPARTMENT () PASSENGER COMPARTMENT () LUGGAGE COMPARTMENTIN YOUR OPINION, WHAT CAUSED THE FIRE? UnknownWAS FIRE REPORTED TO FIRE DEPT? (☒) YES () NO - WAS FIRE RUN REPORT MADE? (☒) YES () NO

IF YES, WHAT WAS NAME - ADDRESS - PHONE NUMBER OF FIRE DEPARTMENT THAT RESPONDED?

EL Paso Fire Dept. Pumper (24)771-1000 EL Paso, TX Fire Report # [REDACTED]WAS FIRE REPORTED TO POLICE? (☒) YES () NO - WAS A POLICE REPORT MADE? (☒) YES () NO

IF YES, WHAT WAS NAME - ADDRESS - PHONE NUMBER OF POLICE DEPARTMENT THAT RESPONDED?

EL Paso Police Dept Police Report # [REDACTED]EL Paso, TXHOW LONG DID YOU REMAIN AT THE SCENE? 2:30 pmHOW DID YOU / OCCUPANTS GET HOME? A friend gave me a ride homeANY WITNESSES TO THIS FIRE LOSS? (☒) YES () NO

IF YES, BY FIRST LAST NAME, PHONE NUMBER OF ALL ADDITIONAL WITNESSES:

[REDACTED]

SECTION VI - DETAILS OF THIS PARTIAL THEFT LOSS: (✓) Not Applicable

DATE OF THEFT: _____ TIME: _____ () AM () PM

SPECIFIC LOCATION FROM WHICH VEHICLE WAS VANDALIZED: _____

WHY WAS YOUR VEHICLE AT THIS LOCATION: _____

WHO LEFT THE VEHICLE AT THIS LOCATION: _____

• DID THIS PERSON HAVE PERMISSION TO USE YOUR VEHICLE: () YES () NO

• PHONE NUMBER / ADDRESS (IF DIFFERENT FROM YOURS): _____

• DATE OF BIRTH: ____/____/____ SOCIAL SECURITY NUMBER: ____-____-____

• DRIVER'S LICENSE NUMBER: _____ STATE: _____ EXPIRES: ____/____/____

WERE ALL DOORS LOCKED: () YES () NO

WERE THERE SIGNS OF FORCED ENTRY: () YES (EXPLAIN) _____ () NO

DATE / TIME VEHICLE LAST SEEN: _____ () AM () PM

DATE / TIME THEFT DISCOVERED: _____ () AM () PM

WHO DISCOVERED VEHICLE: _____

DATE / TIME THEFT REPORTED TO LAW ENFORCEMENT: _____

WHO REPORTED THEFT TO LAW ENFORCEMENT: _____

DEPARTMENT / PRECINCT / PHONE NUMBER OF LAW ENFORCEMENT THEFT WAS REPORTED TO: _____

NAME OF OFFICER WHO RESPONDED: _____

CASE OR REPORT NUMBER FOR THIS REPORTED LOSS: _____

HAVE ANY ARRESTS BEEN MADE, OR ARE THERE ANY SUSPECTS AT THIS TIME: () YES () NO

DO YOU HAVE ANY OTHER INFORMATION YOU BELIEVE IS PERTINENT TO THIS LOSS: () YES () NO

• IF YES TO ANY OF THE FOUR QUESTIONS ABOVE, PLEASE EXPLAIN: _____

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SECTION VI - VEHICLE PURCHASE INFORMATION:

DATE OF PURCHASE: 01/27/05 () NEW (☒) USED PURCHASE PRICE: \$ 12,750
NAME / ADDRESS / PHONE NUMBER OF SELLER: CICO AUTO SALES / PAYLESS AUTO1318 George Dieter
EL PASO, TXHOW DID YOU LEARN THE VEHICLE WAS FOR SALE: WAS referred to this place
& saw it in lot w/ sale stickerHOW DID YOU PAY FOR VEHICLE: () CASH / CHECK (☒) FINANCEDHOW MANY SETS OF KEYS DID YOU RECEIVE WITH PURCHASE OF VEHICLE: 1# OF DUPLICATE SETS OF KEYS MADE FOR THIS VEHICLE SINCE PURCHASE: 0WAS ANOTHER VEHICLE TRADED-IN ON THIS VEHICLE: (☒) YES () NOIF YES, WHAT WAS THE YEAR - MAKE - MODEL - VALUE OF THAT VEHICLE: 1990 Honda
Accord \$1,250DID YOU PURCHASE ANY OTHER INSURANCE (Such as GAP Insurance) ON THIS VEHICLE: () YES (☒) NO

• IF YES, PLEASE EXPLAIN: _____

DID YOU PURCHASE / FINANCE AN EXTENDED WARRANTY FOR THIS VEHICLE: () YES (☒) NO

• IF YES, WHAT WAS THE ADDITIONAL COST: \$ _____

SECTION VII - LIENHOLDER INFORMATION:

NAME / ADDRESS / PHONE NUMBER OF LIENHOLDER HOLDING TITLE TO VEHICLE: West TexasCredit UnionP.O. Box 971940 EL PASO, TX 79997

ACCOUNT NUMBER: _____

AMOUNT OF MONTHLY PAYMENTS: \$ 288.00 NUMBER OF MONTHS FINANCED: 48ARE PAYMENTS CURRENT: (☒) YES () NO• WHEN WAS LAST PAYMENT MADE: 03/08/05HAVE YOU RECEIVED ANY NOTIFICATION OF REPOSSESSION: () YES (☒) NO

• IF YES, PLEASE EXPLAIN: _____

SECTION VIII – ADDITIONAL VEHICLE INFORMATION:

CONDITION AT TIME OF LOSS: () NEEDED SOME REPAIRS / FAIR () AVERAGE / PRIVATE OWNER
 () DEALER FRONT-LINE / RETAIL READY (✓) OTHER – EXPLAIN BELOW:

Sun Roof motor was worked on, New Tires were put on,
Winds hield had been replaced

ANY DISTINGUISHING FEATURES THAT MIGHT HELP IDENTIFY YOUR VEHICLE: (✓) YES () NO

• IF YES, PLEASE EXPLAIN: color was yellow

ANY MECHANICAL REPAIRS OR BODY WORK RECENTLY COMPLETED OR NEEDED: (✓) YES () NO

• IF YES, PLEASE EXPLAIN: car dealer worked on motor for sun roof

WHO PERFORMED ROUTINE MAINTENANCE ON YOUR VEHICLE: () SELF () OTHER

• IF OTHER, PLEASE PROVIDE NAME / ADDRESS / PHONE NUMBER: N/A

DATE LAST SERVICED: / N/A MILEAGE AT THAT TIME:

NUMBER OF KEYS TO VEHICLE AT TIME OF LOSS: 1

NUMBER OF KEYS CURRENTLY IN YOUR POSSESSION: 1

WAS VEHICLE EQUIPPED WITH AN ALARM OR THEFT DETERRENT SYSTEM:

• (✓) YES () NO () DO NOT KNOW

ANY DINGS, DENTS, OR SCRATCHES: (✓) YES () NO Back Bumper on drivers ide was scratch

ANY CRACKED OR BROKEN WINDOWS: () YES (✓) NO

ANY COLOR MIS-MATCHED PANELS: () YES (✓) NO

ANY MISSING TRIM OR PARTS: () YES (✓) NO

SECTION IX – VEHICLE DESCRIPTION:

VIN: 1FMYU03131K Total of 17 Digits).

YEAR: 2001 MAKE: FORD MODEL: ESCAPE xLT

MILEAGE AT TIME OF LOSS: 82,000 ??? () IN EXCESS OF 100,000 MILES.

COLOR (OUTSIDE): Yellow COLOR (INSIDE): gray

BODY STYLE: (CHECK ALL APPLICABLE FEATURES OR OPTIONS)

() 2DR () 3DR (✓) 4DR (✓) HATCHBACK () CONVERTIBLE () STATION WAGON
 (✓) SPORT UTILITY VEHICLE () PICKUP TRUCK () ½ TON () ¾ TON () 1-TON () OTHER
 () SHORT BED () LONG BED () STYLESIDE / FLEETSIDE () FLARESIDE () CAB & CHASSIS
 () WINDOW VAN () PANEL VAN () CUSTOMIZED VAN () MOTORCYCLE

DRIVE-TRAIN (CHECK ALL APPLICABLE FEATURES OR OPTIONS)

() 4-CYL () 5-CYL (✓) 6-CYL () 8-CYL () 10-CYL () 12-CYL
 () TURBO () DIESEL () ALTERNATIVE FUEL (EXAMPLE: ELECTRIC/HYBRID/PROPANE)
 (✓) AUTOMATIC () ELEC. OVERDRIVE () MANUAL: () 3-SPEED () 4-SPEED () 5-SPEED () 6-SPEED

COMMENTS / ADDITIONAL EXPLANATION: N/A

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FACTORY POWER OPTIONS: (CHECK ALL APPLICABLE FEATURES OR OPTIONS)

() DRIVER'S SEAT () LUMBAR () PASSENGER'S SEAT (✓) MIRRORS () ANTENNA
 (✓) TRUNK RELEASE () STEERING (✓) BRAKES (✓) WINDOWS (✓) DOOR LOCKS

FACTORY EQUIPPED AUDIO / VIDEO OPTIONS: (CHECK ALL APPLICABLE FEATURES OR OPTIONS)

(✓) AM (✓) FM (✓) STEREO (✓) SEEK (✓) SCAN (✓) CASSETTE () CB RADIO () CAR PHONE
 (✓) CD PLAYER () CD CHANGER () CD STACKER (✓) EQUALIZER () WATT AMPLIFIER
 () BOSE MUSIC SYSTEM () JBL STEREO SYSTEM () INFINITY STEREO SYSTEM
 () MONTERRY STEREO SYSTEM () NAKAMICHI STEREO SYSTEM () OTHER - EXPLAIN BELOW:

FACTORY EQUIPPED WHEELS / TIRES: (CHECK ALL APPLICABLE FEATURES)

() STANDARD HUBCAPS OR TRIM RINGS () FULL WHEEL COVERS () WIRE WHEEL COVERS
 () ALUMINUM WHEELS (✓) ALLOY WHEELS () STYLED WHEELS () WIRE WHEELS
 (✓) CHROME WHEELS () RALLY WHEELS () OTHER: _____

TYPE / SIZE TIRES: 16**FACTORY DÉCOR / CONVENIENCE: (CHECK ALL APPLICABLE FEATURES)**

(✓) AIR CONDITIONING () DUAL A/C CONDITIONING () AUTOMATIC TEMPERATURE CONTROL
 (✓) REAR WINDOW DEFROSTER (✓) TINTED GLASS () PRIVACY GLASS () FOG LAMPS
 (✓) TILT STEERING WHEEL () TELESCOPIC STEERING WHEEL (✓) CRUISE CONTROL
 (✓) REAR WINDOW WIPER (✓) INTERMITTENT WINDSHIELD WIPERS () KEYLESS ENTRY
 (✓) CLOTH SEATS () LEATHER SEATS (✓) RECLINING SEATS () 3RD SEAT - WAGONS
 () SPLIT BENCH SEATS (✓) BUCKET SEATS (✓) FLOOR CONSOLE (✓) OVERHEAD CONSOLE
 (✓) BODY SIDE MOULDINGS () WOODGRAIN EXTERIOR TRIM
 () 2-TONE PAINT () METALLIC PAINT () PEARL COAT PAINT

FACTORY SAFETY OPTIONS: (CHECK ALL APPLICABLE FEATURES)

(✓) DRIVER'S AIRBAG (✓) PASSENGER'S AIRBAG () SIDE AIRBAG () HEADREST AIRBAG
 () AIRBAG LOCKOUT (✓) ANTI-LOCK BRAKES () POSITRACTION () TRACTION LOCK
 () 4-WHEEL DISC BRAKES (✓) THEFT DETERRENT PACKAGE () AUTO LEVEL CONTROL

FACTORY ROOF OPTIONS: (CHECK ALL APPLICABLE FEATURES)

VINYL TOP: () FULL () HALF () CABRIOLET TOP (✓) ROOF RACK () REMOVABLE HARDTOP
 SUNROOF/MANUAL: () STEEL (✓) GLASS () FLIP-UP T-TOPS: () GLASS () SOLID
 SUNROOF/ELECTRIC: () STEEL (✓) GLASS () DUAL SUNROOF

COMMENTS / ADDITIONAL EXPLANATION: _____

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FACTORY TRUCK / VAN / UTV-SUV OPTIONS: (CHECK ALL APPLICABLE FEATURES)

- ☐ POWER SLIDING REAR DOOR ☐ SLIDING REAR WINDOW ☐ 3RD DOOR ☐ 4TH DOOR
☒ REAR STEP BUMPER: PAINTED ☐ REAR STEP BUMPER: CHROME ☐ DUAL FUEL TANKS
☐ RUNNING BOARDS: FIBERGLASS ☒ RUNNING BOARDS: METAL ☐ CHROME BED RAILS
☐ GRILLE GUARD: PAINTED ☐ GRILLE GUARD - CHROME ☐ ROLL BAR ☐ WINCH ☐ TOW PKG.
☒ HARD TOP ☐ SOFT TOP ☐ DUAL REAR WHEELS ☐ BED LINER: VINYL ☐ BED LINER: SPRAY
☒ HIGHBACK BUCKET SEATS ☐ QUAD SWIVEL BUCKETS ☐ SWIVEL CAPTAIN CHAIRS
☐ 7-PASSENGER ☐ 8-PASSENGER ☐ 9-PASSENGER ☐ 12-PASSENGER ☐ 15-PASSENGER
☐ 4-WHEEL DRIVE ☐ OFF-ROAD PACKAGE ☐ HEAVY DUTY / WORK TRUCK PACKAGE

NON-FACTORY ACCESSORIES, ENHANCEMENTS, REFURBISHMENTS, OR UPGRADES:

DATE PURCHASED: **AMOUNT PAID / COST:** **DESCRIPTION / DETAIL OF ENHANCEMENT:**

_____	_____	_____
_____	_____	_____
_____	_____	_____

PLEASE PROVIDE A BRIEF DESCRIPTION OF YOUR LOSS, INCLUDING ANY ADDITIONAL INFORMATION / DETAIL THAT YOU WISH TO ADD:

my vehicle was just parked in the parking lot when I happened to go outside and people told me my truck was smoking and in a matter of minutes just went up in flames. The vehicle had not been driven for an 1 1/2 hours. My vehicle was parked at work when this occurred.

CAUTION: READ CAREFULLY BEFORE SUBMITTING AFFIDAVIT.

I SWEAR THAT THE INFORMATION CONTAINED IN THIS TOTAL THEFT, FIRE LOSS, OR PARTIAL THEFT AFFIDAVIT, CONSISTING OF FIFTEEN (15) PAGES, INCLUDING THE COVER PAGE AND THIS SIGNATURE PAGE, IS COMPLETE, TRUE, AND CORRECT UNDER PENALTY OF PERJURY. I AGREE TO COOPERATE WITH NATIONWIDE MUTUAL INSURANCE COMPANY AND IT'S SUBSIDIARIES AND AFFILIATES (NATIONWIDE) THROUGHOUT THE PROCESS OF MY CLAIM AND AGREE TO TAKE WHATEVER STEPS ARE NECESSARY TO PROTECT THIS VEHICLE FROM FURTHER DAMAGE OR COST TO NATIONWIDE INSURANCE COMPANY. IF APPLICABLE, SHOULD I BE NOTIFIED THAT THIS VEHICLE HAS BEEN RECOVERED, AT ANY TIME, I WILL NOTIFY NATIONWIDE IMMEDIATELY. SHOULD ANY SUSPECT BECOME KNOWN TO ME, I WILL ADVISE LAW ENFORCEMENT AND NATIONWIDE IMMEDIATELY AND ASSIST IN PROSECUTION OF ANYONE FOUND TO BE GUILTY OR INVOLVED IN THE THEFT, DISMANTLING, OR DESTRUCTION OF THIS VEHICLE.

3/14/05

(DATE / SIGNATURE / PRINTED NAME OF INSURED)

(DATE / SIGNATURE / PRINTED NAME OF SPOUSE)

(DATE / SIGNATURE / PRINTED NAME OF WITNESS)

PLEASE NOTE THIS PAGE MUST BE NOTARIZED TO COMPLETE YOUR CLAIM

State of Texas

County of TexasSworn to and subscribed before me on the 14th day of March, 2005.

(Personalized Seal)

Maggie Rodriguez
Notary Public Signature

KELLOUGH & ASSOCIATES, INC.
MIDLAND-AMARILLO-LUBBOCK-DALLAS & SAN ANTONIO
TEXAS

April 26, 2005

Mr. Pat Bailey
Nationwide Insurance
12401 Research Blvd.
Suite 150
Austin, Texas 78759

Re	Vehicle	: 2001 Ford Escape
	Vehicle Identification	: 1FMYU03131K [REDACTED]
	License	: Texas [REDACTED]
	Claim Number	: [REDACTED]
	Our File Number	: [REDACTED]

Dear Mr. Bailey:

Pursuant to your request I conducted an origin and cause examination on the above referenced vehicle. The vehicle was located at the IAAI Auto Auction located at 14651 Gateway West in El Paso County, Texas. My examination commenced on Friday, April 15, 2005.

I have enclosed 20 color photographs with this report to document the damage to the vehicle.

The vehicle examined had sustained a localized but extensive fire in the engine compartment with the heaviest damage occurring mostly from about the center of the compartment to the driverside, see photographs 8 & 9. The left front tire sustained fire and heat damage and the tire was deflated. The fire vented out the left headlight area. See photographs 6 & 7.

This vehicle has a transverse mounted gasoline engine with the front of the engine facing the left side of the engine compartment. This is the area of the fire origin that involved gasoline where a rubber fuel line was consumed. This area is shown in photographs 13, 14 & 15. Additionally the brake master cylinder was burned away and the brake fluid was also consumed.

The electrical service in this immediate area was destroyed where the insulation was burned off leaving the stranded copper wiring bare. I found no arcing or electrical involvement present. The battery cables were also absent insulation but fully intact with no area of arcing found.

Photographs 19 & 20 show the remains of the throttle body that was found separated from the engine. This component had sustained damage from heat causing deformity.

HOME OFFICE: P.O. BOX 80143, MIDLAND, TEXAS 79708
432-570-8668 / 432-556-5479

PE06-048-0273LC

PAGE 2

CLAIM NUMBER: [REDACTED]

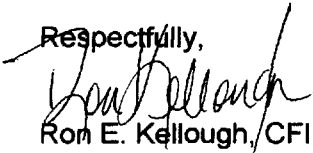
As we discussed it is my opinion this fire was caused by the ignition of gasoline at the front of the engine area as shown in photograph 15 where the fuel line is located and the connecting line is burned away. There were no other causes for this fire identified

I could not determine that the fire was a result of the recall concerning the O-Ring at the fuel filter but this possibility could not be eliminated as the cause. It was reported that the owner of the vehicle had returned to work and approximately 30 minutes later a co-worker discovered the fire. This is consistent to the possibility of a gasoline leak onto a hot engine that could ignite the gasoline vapors.

It was also reported the vehicle had 79,500 miles on it at the time of the fire and the owner had recently purchased it used. I found no evidence that this vehicle had ever been involved in an accident or any body damage had been repaired. My examination was based on only a visual examination of the damage and did not involve a background investigation on the vehicle as to any recent repairs or recall repairs that may have been accomplished on this vehicle.

I will not conduct any further investigation on this loss at this time. If any additional information becomes available I would appreciate the opportunity to review and will expand or amend my opinion if appropriate.

Respectfully,



Ron E. Kellough, CFI
President
Kellough & Associates, Inc.



Kellough & Associates, Inc.

PHOTOGRAPH SHEET

File No.:



No. 1



No. 2



Kellough & Associates, Inc.

PHOTOGRAPH SHEET

File No.:



No. 3



No. 4

Page 2 of 10



Kellough & Associates, Inc.

PHOTOGRAPH SHEET



NO. 5



NO. 6



Kellough & Associates, Inc.

PHOTOGRAPH SHEET

File No.:



No. 7



No. 8

Page 4 of 10



PHOTOGRAPH SHEET

File No.:

Kellough & Associates, Inc.



No. 9



No. 10

Page 5 of 10



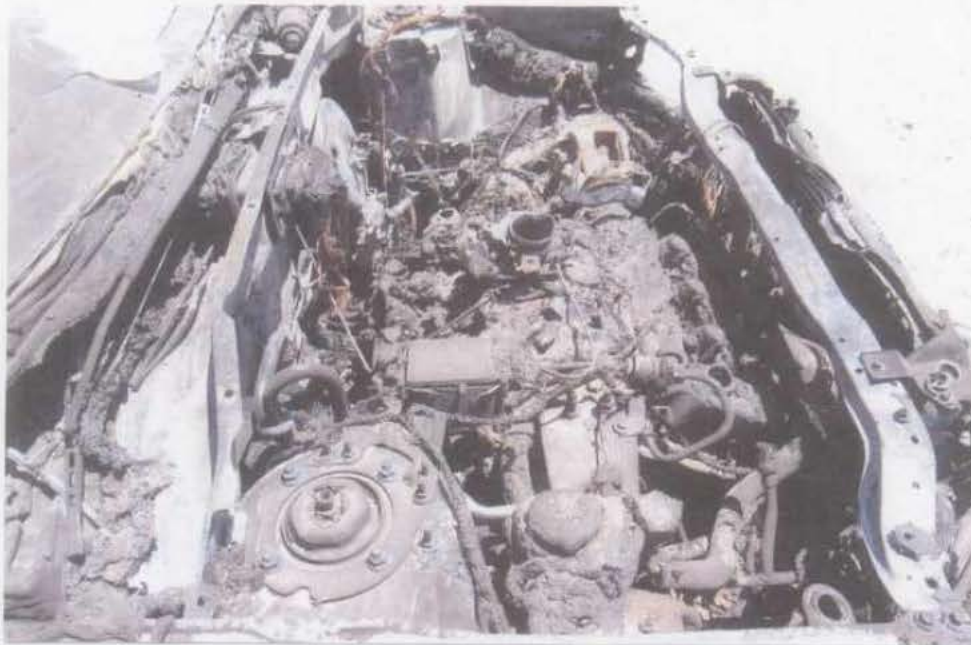
Kellough & Associates, Inc.

PHOTOGRAPH SHEET

File No.:



NO. 11



NO. 12

Page 6 of 10



Kellough & Associates, Inc.

PHOTOGRAPH SHEET

File No.:



No. 13



No. 14

Page 7 of 10



Kellough & Associates,

PHOTOGRAPH SHEET

File No.: [REDACTED]



no. 15



no. 16

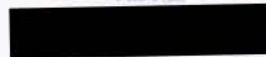
Page 8 of 10



Kellough & Associates, Inc.

PHOTOGRAPH SHEET

File No.:



NO. 17



NO. 18

Page 9 of 10



Kellough & Associates, Inc.

PHOTOGRAPH SHEET

File No.: [REDACTED]

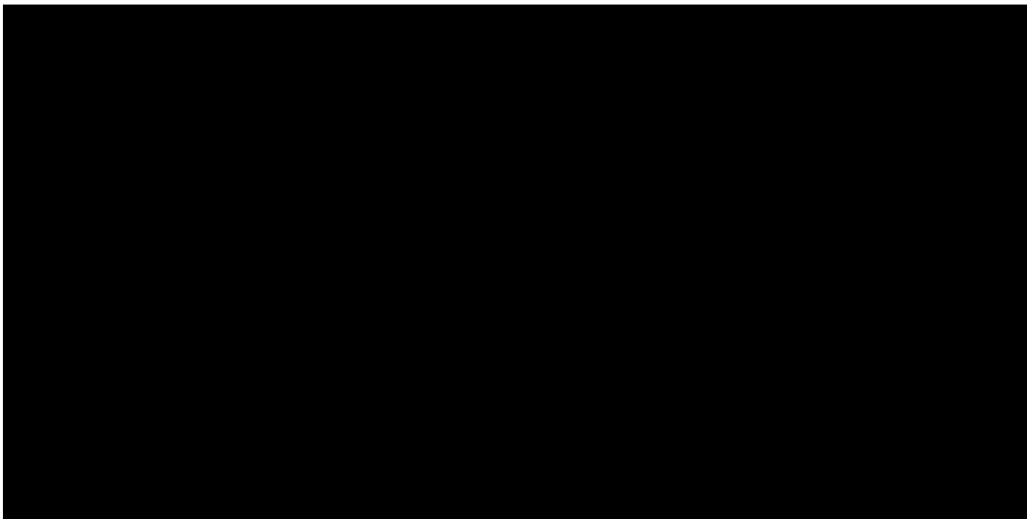


No. 19



No. 20

Page 10 of 10



RECEIVED JUN 7 2005

OGG
548

The Motorists Insurance Group, You know us.®

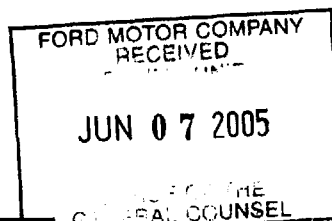
5007 E 4 NND

P.O. Box 182476, Columbus, Ohio 43218-2476

JUN 03 2005
www.motoristsgroup.com

May 29, 2005

FORD MOTOR COMPANY
CUSTOMER RELATIONSHIP CENTER
P O BOX 6248
DEARBORN MI 48121



Claim number : [REDACTED]
Insured : [REDACTED]
Date of occurrence : 05/01/2005

Please be advised that Motorists Insurance Group is the homeowners insurance carrier and the auto carrier for [REDACTED]. This letter is to put you on notice of a vehicle fire that occurred on May 1, 2005 to our insured's 2002 Ford Escape when it was parked in her garage. The fire caused extensive damage to the home, and destroyed the vehicle.

The vehicle was purchased new at Waikem Ford on Lincoln Way E. in Massillon OH. All service was performed there. We have also up Waikem on notice of this loss. The addresses are as follows:

Waikem Auto Group
4321 Lincoln Way E.
Massillon OH 44646

330-478-1801

2002 Ford Escape VIN 1FMYU04192K [REDACTED]

[REDACTED]
Massillon OH [REDACTED]

We are having a fire cause and origin engineer inspect the vehicle, and we are requesting that your work with him in inspecting the vehicle. Please contact this office at your earliest convenience to arrange to meet for the inspection.

We thank you for your attention to this matter.

Motorists Mutual Insurance Company

ROBERT KELLMAN
CLAIMS SPECIALIST
(330) 896-7818 OR (800) 876-8766 EXT 37818
FAX: (866) 790-6431
CM@MOTORISTSGROUP.COM

The Motorists Insurance Group

Motorists Mutual Insurance Company
Motorists Life Insurance Company
MICO Insurance Company

American Hardware Mutual Insurance Company
AHM Insurance Agency, Inc.

Wilson Mutual Insurance Company
Broad Street Brokerage, LLC

Iowa Mutual Insurance Company
Iowa American Insurance Company

PE06-048-0286LC



4665 Allen Road
Suite A
Stow, Ohio 44224
330.923.2360 • 800.343.4366
Fax 330.923.2365
www.SEAlimited.com

July 8, 2005

Motorists Insurance Company
Robert Kellman
P.O. Box 7647
Akron, Ohio 44306

Re: Vehicle Fire Analysis – Preliminary Report

Insured: [REDACTED]

Address of Loss: 2 [REDACTED]
Massillon, Ohio [REDACTED]

Date of Loss: May 1, 2005

Your Claim No. [REDACTED]

SEA Project No. [REDACTED]

Dear Mr. Kellman:

On May 2, 2005, you requested that SEA, Ltd. conduct an investigation into the above-captioned fire and render a professional opinion regarding the cause of the loss. A verbal report of our findings from the initial fire scene investigation was provided to you on May 6, 2005. On June 30, 2005, you requested that SEA provide you with a preliminary report of the investigation thus far. Therefore, this report, accompanied by photographs in bulk format, will provide you with the status of the investigation, and will indicate some of the work that still remains to be completed.

A visit to the fire scene was conducted on May 5, 2005, by SEA Electrical Engineer Thomas J. Whitby, P.E., C.F.E.I. At that time, the following investigative tasks were completed:

- Permission to enter the property and examine the vehicle was obtained from [REDACTED]
- An interview with the vehicle owner, [REDACTED] was conducted at the fire scene.
- Copies of the vehicle's service and maintenance records from Waikem Ford, Inc., were obtained and reviewed.

- The dwelling's garage where the vehicle was located at the time of the fire was examined and documented with photographs, field notes, and schematics. Debris that had fallen to the garage floor from the vehicle during the fire was gathered and stored with the vehicle.
- The 2002 Ford Escape was examined and documented with photographs, field notes and schematics.
- Remaining burn patterns were analyzed, and the origin area for this fire was isolated.
- Potential accidental and incendiary causes were considered and evaluated.
- Available ignition sources within the origin area were addressed.
- The ABS control module, which was located in the origin area and broke loose during the fire, was removed from the vehicle and transported to SEA's facility in Stow, Ohio. This module was removed and stored to ensure it would not be lost during the transport of the vehicle from the dwelling to the storage location (ADS in Columbia Station, Ohio).
- The site visit was temporarily ceased to notify Ford and Waikem Ford of the fire to allow them an opportunity to examine the vehicle. No destructive testing or disassembly has been performed on the vehicle up to the date of this report.

Subsequent to the initial site investigation, SEA has performed the following tasks:

- A copy of the wiring schematics for the 2002 Ford Escape was obtained and reviewed.
- The National Highway Traffic Safety Administration's web site was reviewed for any recalls, service bulletins, defect investigations, or complaints pertaining to the 2002 Ford Escape.
- Two exemplar 2002 Ford Escapes were examined and documented for educational and comparative purposes.
- The subject vehicle was towed from the premises to ADS in Columbia Station, Ohio, where it will be stored until otherwise instructed.

After the completion of all the above-mentioned tasks, SEA has concluded that **this fire originated within the engine compartment of the subject 2002 Ford Escape, while it was parked in the garage of the residence (the vehicle was pulled into the driveway by the fire department).** The subject vehicle had VIN No. 1FMYU04192K[REDACTED]

Mr. Robert Kellman
July 8, 2005
Page 3

More specifically, this fire originated near the right rear quadrant of the vehicle's engine compartment, at or near the ABS (anti-lock brake system) control module.

Located in the area where the burn patterns on the vehicle appear to originate was the ABS control module. Visual examination of this module revealed evidence of electrical arcing and shorting both on the wiring at the top of the module and on the electrical components inside this module. **Although the opinions stated within this report are preliminary and subject to change upon obtaining new information, a failure of the ABS control module inside the vehicle has been determined to be the likely cause for this fire.**

At this time, no final conclusion as to the exact cause of the fire has been determined. A more in-depth examination of the vehicle's engine compartment is required in order to finalize conclusions about the cause of the fire. This in-depth examination will require some destructive disassembly and testing. Because of the destructive nature of the examination, SEA will wait to hear from both Ford and Waikem Ford regarding their intentions to examine the vehicle. Should Ford and/or Waikem Ford decide they would like to be involved in the destructive examination of the vehicle, an examination date can be coordinated through SEA. Should these companies decide not to participate in this examination, SEA will require a written notification of non-participation.

SEA has no further actions scheduled at this time. Should you have any questions regarding this report, please do not hesitate to contact this office. At the conclusion of this investigation and upon your request, a full detailed report of our findings in this matter can be prepared. We will place this file on hold until we hear from Motorists Insurance Company, Ford Motor Company, and Waikem Ford regarding the completion of the vehicle examination. Thank you for allowing us to assist you in this matter.

Report Prepared By:



Thomas J. Whitby, P.E., C.F.E.I.
Electrical Engineer
State of Ohio
Registration No. E-70258

Report Reviewed By:



Richard P. Shearer, P.E.
Director of Engineering
State of Ohio
Registration No. E-39823

TJW/plh

08/24/2005 02:38PM

PE06-048-0289LC

MASSILLON FIRE DEPARTMENT RESPONSE RECORD

C:\MSPUB\FORMS\RUN-REP O.F.

Station: **1**

Alarm No.: **1220**

Date: 05-01-05 ☒ FIRE ☐ PS ☐ R&E Shift: ☐ 1 ☐ 2 ☒ 3 Type of Call: ☐ Accid. ☐ Building ☐ Box ☒ Vehicle ☐ Out on arrival ☐ Other ☐ False Strike out time: _____	Vehicle	Enroute	On Scene	Fill	In Service	In Quarters
	E - 210					
	E - 211	0907	0911		0949	1035
	E - 212	0907	0910		1039	1047
	E - 213					
	E - 214	0913		0916	1313	1400
	E - 215					
	T - 216					
	R - 218					
	R - 220					
R - 230	0907	0911		0949	1030 to run 1221	
R - 240						

Location: _____ Caller: _____

BUILDING: _____
Occupant(s): _____

Owner: **SAME AS ABOVE**

Address: _____

Construction Type: **FRAME**

No. of Stories: **2** Type of Occupancy: **RAISED RANCH SINGLE FAMILY DWELLING**

Smoke Detectors: ☒ Yes ☐ No Activated: ☒ Yes ☐ No

Bldg. Sprinklered: ☐ Yes ☐ No Activated: ☐ Yes ☐ No

Insurance Agent (building): **MOTORIST INSURANCE GROUP TOM HAMSHER AGENCY**

Insurance Agent (contents): **SAME AS ABOVE**

Estimated Loss (building): **\$5,000.00**

Estimated Loss (contents): **\$2,500.00**

VEHICLE:

Owner: _____ Driver: **PARKED IN GARAGE**

Address: _____ Address: _____

Make: **FORD ESCAPE**

V. I. N. **1FMYU04192Z**

Year: **2002**

License: _____

Estimated Loss: **\$13,000.00**

Insurance Agent: **SAME AS DWELLING**

OTHER: _____

FIRE : (cause):

UNDER INVESTIGATION BY THE FIRE PREVENTION BUREAU

Origin (Floor & Location): **ENGINE COMPARTMENT OF VEHICLE PARKED INSIDE THE GARAGE**

Extension to: **DASH AREA OF VEHICLE - SMOKE DAMAGE THROUGHOUT RESIDENCE**

CASUALTIES: (Injuries, Deaths (Name, Age, Injury))

HOSE	Laid	Used	Total Feet	Section Numbers
Booster				
1 1/2"				
1 3/4"				
2 1/2"	300'	300'	300'	16,170,212,403,1479,1486
2 1/2"				
4"				

Pump Time..... Axes..... 1 Aerial..... Hand lights..... 1
 Ladders used.. Pike poles..... Fans..... 1 Generator.....
 (give Length) ... Flood lights... Scotts..... 4 Extinguishers..
 Other: THERMAL IMAGER, 1 SPARE AIR BOTTLE

Hydrant Location: [REDACTED] Condition: OK Time: 1/2 HR.
 Hydrant Location: Condition: Time:

REMARKS & DETAILS -

RESPONDED TO A REPORT STRUCTURE FIRE. UPON ARRIVAL OF E212, LIGHT SMOKE WAS SHOWING FROM THE RESIDENCE. E211 LAID A SUPPLY LINE FROM THE HYD. AT 25TH & MEADOWS. ENTERED THE HOME AND FOUND SMOKE COMING FROM THE GARAGE AREA. PULLED A 1-3/4" INTO THE HOME, ENTERED THE GARAGE, AND FOUND A FIRE IN THE VEHICLE PARKED IN THE GARAGE. COULD NOT GET THE GARAGE OPEN FROM THE INTERIOR. OPENED THE GARAGE DOOR FROM THE EXTERIOR. AFTER THE GARAGE DOOR WAS OPENED, REMOVED THE LINE FROM THE HOME AND ENTERED THE GARAGE DOOR WITH THE LINE. EXTINGUISHED THE REMAINING FIRE IN THE VEHICLE. USED FANS TO REMOVE SMOKE FROM THE RESIDENCE.

ROHRS TOWING WAS CALLED TO PULL THE VEHICLE FROM THE GARAGE. THE F.P.B. WAS CALLED TO INVESTIGATE.

THE FIRE HEAVILY DAMAGED THE FRONT END OF THE VEHICLE AND CAUSED SMOKE DAMAGE THROUGHOUT THE HOME.

J. BOWERS WAS CALLED TO SECURE THE GARAGE DOOR.

SIGNED: (Name & Rank) [REDACTED]

VEHICLE	OFFICER	DRIVER	TAIL	MASK
E210				
E211	BRUMBAUGH	PODLOGAR	FLYNT	E. SMITH/SHERER
E212 / R220	McDERMOTT	WINTERS		
E213 / R230	MARKWOOD	FAY		
E214 / R240	ANNEN	GANOE		
E215				

ADDITIONAL PERSONNEL:

CAPT. J. LAYNE & INSP. STUCK

FILED

MAY 22 2006

PHIL G. GIAVASIS
STARK COUNTY OHIO
CLERK OF COURTS

COURT OF COMMON PLEAS
STARK COUNTY, OHIO

[REDACTED]
Columbus, OH [REDACTED]

Plaintiff

v.

GEO. WAIKEM FORD, INC.
4321 Lincoln Way East
Massillon, OH 44646
Attn: George E. Waikem, Jr.

and

FORD MOTOR COMPANY
Park Lane Towers West, Suite 300
3 Park Lane Boulevard
Dearborn, MI 48126-2568

Defendants

CASE NO. [REDACTED]

JUDGE

Sinclair

COMPLAINT

(With Jury Demand Endorsed Hereon)

PR

6 MAY 30 P 4:40

RECEIVED
CLERK OF COURTS
STARK COUNTY, OHIO

1. [REDACTED] is a property and
casualty insurance company licensed to do business in the state of Ohio.

2. At all times herein, [REDACTED] insured the real and personal property of
[REDACTED] Massillon, Ohio [REDACTED] including
her home and automobile.

3. Defendant Geo. Waikem Ford, Inc. ("Waikem") is an Ohio corporation that operates as a Ford auto dealership.

4. Ford Motor Company ("Ford") is a foreign corporation licensed to do business in the state of Ohio.

5. In or about 2002, [REDACTED] purchased a new 2002 Ford Escape (the "Vehicle") from Waikem. On information and belief, on numerous occasions, [REDACTED] took the Vehicle to Waikem for servicing, including repair work for several recalls. The only services on the Vehicle, not performed by Waikem, were for periodic oil changes.

6. On May 1, 2005, the Vehicle caused a fire while parked in [REDACTED] garage (the "Fire"). The Vehicle had not been driven for at least several hours before it caused the Fire.

7. The Fire caused substantial damage to the Vehicle and substantial damage to the real and personal property of [REDACTED]

8. Motorists paid \$48,152.79 on behalf of [REDACTED] for damage to her real and personal property and in excess of \$17,065.98 on behalf of [REDACTED] for damage to the Vehicle.

9. Motorists became subrogated to the rights of [REDACTED] to the extent of these payments.

COUNT I
(Against Ford Motor Company)

10. Motorists incorporates each and every allegation contained in paragraphs 1 through 9 of this Complaint.

11. Ford is a manufacturer of products as defined in the Ohio Product Strict Liability Statute.

12. Ford either defectively manufactured or designed the Vehicle such that the Vehicle could cause a fire. On information and belief, it is believed that such a defect in the

automatic braking system caused the Fire but since Ford has refused to cooperate in the further testing and inspection of the Vehicle, Plaintiff has not finalized its investigation.

13. Ford's defective manufacture and/or design of the Vehicle was the proximate cause of the Fire and loss in this case.

14. Because of Ford's defective design and/or manufacture, Ford is liable to Motorist in the amount in excess of \$48,152.79.

**COUNT II
(Breach of Warranty)**

15. [REDACTED] each and every allegation contained in paragraphs 1 through 14 of this Complaint.

16. Ford either expressly or impliedly warranted that the Vehicle would be free from defects that could or may cause a fire.

17. Ford breached its warranties.

18. Ford is liable to Motorists for an amount in excess of \$17,065.98 for breach of warranty.

**COUNT III
(Negligence Against Waikem)**

19. [REDACTED] each and every allegation contained in paragraphs 1 through 18 of this Complaint.

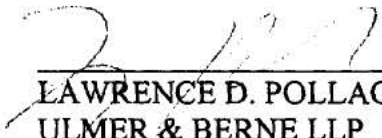
20. On several occasions, Waikem inspected and/or performed repairs on the Vehicle.

21. In the alternative to the above strict product liability and breach of warranty claims, to the extent that the Vehicle may have been altered from its original design, Waikem negligently made such alterations and/or repairs.

22. Waikem's negligence is the proximate cause of the Fire that occurred.

23. Waikem is liable to [REDACTED] in an amount in excess of \$65,000.

WHEREFORE, [REDACTED] prays for damages against Ford and/or Waikem in an amount in excess of \$25,000 plus cost of this action.


LAWRENCE D. POLLACK (0042477)

ULMER & BERNE LLP

Skylight Office Tower

1660 West 2nd Street, Ste. 1100

Cleveland, Ohio 44113-1448

lpollack@ulmer.com

Tel. (216) 583-7000

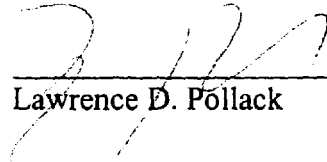
Fax. (216) 583-7001

Attorney for Plaintiff

[REDACTED]

JURY DEMAND

Plaintiff requests a jury of the maximum number to hear all issues in this case.



Lawrence D. Pollack





- Government Employees Insurance Company
- GEICO General Insurance Company
- GEICO Indemnity Company
- GEICO Casualty Company

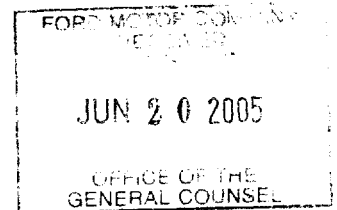
One GEICO Landing ■ Virginia Beach, Virginia 23454-5696

June 13, 2005

New

Office of General Counsel
Attn: Shawn Norton
3 Park Lane Blvd
Dearborn, MI 48126

Our Claim Number: [REDACTED]
Our Insured: [REDACTED]
Vehicle: 2002 Ford Escape XLT
VIN# 1FMCU04162K [REDACTED]



Dear Mr. Norton:

Please be advised that our insured's Escape caught fire on June 4, 2005 while it was parked and unoccupied. The fire appears to have been caused by an electrical malfunction and will be further investigated by GEICO. If you would like to have a representative present while a cause and origin expert determines the cause, please call me so that we can make arrangements. If I do not hear from you by June 23, 2005 we will proceed without your presence. Should the cause be determined to be that of a manufacturer's defect, GEICO will notify all necessary parties and submit out subrogation paperwork to you. Thank you in advance for your attention in this matter.

Very truly yours,

Jeff VanBuskirk
Fire Investigator
(800)582-8114 ext 6816
jvanbuskirk@geico.com

cc: [REDACTED]

ISSUE LIST

Last Handling Date/ Issue Status	Name/ Reason Desc	Vin/ Case No.	Model Year and Vehicle Line	Issue Type
6/13/2005 CLOSED	[REDACTED] LEGAL - FIRE CLAIM	1FMCU04162K [REDACTED] [REDACTED]	2002 ESCAPE	07

[REDACTED] 6/23/2005

PE06-048-0299LC

All Action Details for Issue

Print

VIN: 1FMCU04162H [REDACTED] Year: 2002
Name: [REDACTED] Owner Status: Subsequent
Symptom Desc: FIRE/SMOKE VISIBLE FLAME
Reason Desc: LEGAL - FIRE CLAIM
Issue Type: 07 LEGAL Issue Status: CLOSED

Model: ESCAPE Case: [REDACTED]
WSD: 2002-01-31
Primary Phone: [REDACTED]
Secondary Phone:

Action: OPEN LEGAL CONTACT - PRODUCT LIABILITY - FIRE

Dealer: 06644 WILLIAMSBURG MOTORS, INC.

Origin Desc: CONSUMER AFFAIRS - LITIGATION
PREVENTION-FD

Odometer: 46000 MI

Comm Type: EMAIL

Analyst Name:
LEICH,CHERIE

Analyst: CLEICH

Action Date: 06/09/2005

Action Time:
10.46.55.640

Action Data: Yes

Comments *****PRODUCT LIABILITY*****EMAIL RECEIVED 6-7-05. DEALER CONTACT:
[REDACTED] CUSTOMER ALLEGES VEHICLE STARTED ON FIRE WHILE PARKED IN THE GARAGE.CUSTOMER
REQUESTS CONTACT FROM FORD REPRESENTATIVE.

Data Element Name	Data Value
ANALYST ID	KDUNLAP

Action: MAKE OUTBOUND CALL TO DEALER

Dealer: 06644 WILLIAMSBURG MOTORS, INC.

Origin Desc: CONSUMER AFFAIRS - LITIGATION
PREVENTION

Odometer: 46000 MI

Comm Type: PHONE

Analyst Name: DUNLAP,
KENISHA

Analyst: KDUNLAP

Action Date: 06/10/2005

Action Time:
09.12.46.797

Action Data: No

Comments LPA CONTACTED DLR CONTACT RICK JONES. RICK WAS UNAVAILABLE. LPA LEFT A V-MAIL MSG.

Action: INFORMATIONAL CALL/FAX

Dealer: 06644 WILLIAMSBURG MOTORS, INC.

Origin Desc: CONSUMER AFFAIRS - LITIGATION
PREVENTION

Odometer: 46000 MI

Comm Type: PHONE

Analyst Name: DUNLAP,
KENISHA

Analyst: KDUNLAP

Action Date: 06/13/2005

Action Time:
10.33.46.155

Action Data: No

Comments LPA RECEIVED A CALL FROM [REDACTED] [REDACTED] STATED THAT THE DATE OF THE FIRE WAS 6/4/05. HE
STATED THAT THE VEHICLE IS CURRENTLY WITH GEICO INSURANCE. GEICO HAS DEEMED THE VEHICLE A
TOTAL LOSS. THERE WERE NO INJURIES. THE VEHICLE WAS PARKED IN A GARAGE AT THE TIME OF THE FIRE
AND CAUSED DAMAGE TO THE HOME. CUSTOMER BELIEVES THAT THE VEHICLE FIRE IS RELATED TO 05S28.

Action: REFER TO INSURANCE CARRIER - INSURANCE COMPANY ALREADY INVOLVED

Dealer: 06644 WILLIAMSBURG MOTORS, INC.

Origin Desc: CONSUMER AFFAIRS - LITIGATION
PREVENTION

Odometer: 46000 MI

Comm Type: PHONE

6/23/2005

PE06-048-0300LC

Analyst Name: DUNLAP,
KENISHA

Analyst: KDUNLAP

Action Date: 06/13/2005

Action Time:
10.34.52.472

Action Data: No

Comments LPA ADVISED CUSTOMER TO CONTINUE WORKING WITH HIS INSURANCE COMPANY AS THEY ARE ALREADY INVOLVED, THERE ARE NO RELATED RECALLS, NO RELATED REPAIR HISTORY, AND THE VEHICLE IS BEYOND WARRANTY. NOTHING FURTHER. LPA MAILED CLOSING CORRESPONDENCE. CASE FILED.

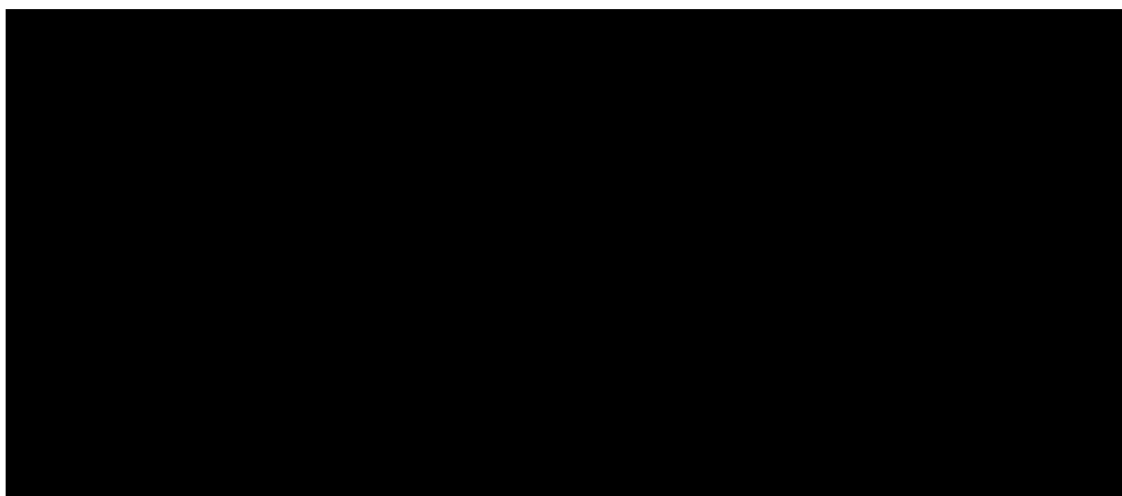
6/23/2005

PE06-048-0301LC

Vehicle List					
VIN	Year	Model	Sales Type	Owner Status	Vehicle Info
1FMCU04162K [REDACTED]	2002	ESCAPE	RETAIL SALE TO PRIVATE INDIVIDUAL	Subsequent Owner	Oasis Warranty History
1FMCU94164K [REDACTED]	2004	ESCAPE	RETAIL SALE TO PRIVATE INDIVIDUAL	Subsequent Owner	Oasis Warranty History

6/23/2005

PE06-048-0302LC



New

JUN 28 2005

BEGINNING OF CONTACT
06/25/2005

VOICE OF THE CUSTOMER TRACKING SYSTEM

08.00.04

REGION: 53 KANSAS CITY OGC ISSUE CASE NBR: [REDACTED]
VIN: 1FMYU04181K [REDACTED] ZONE: B2 OPENED: 06/24/2005
ENGINE: 1 VEH TYPE: T CLOSED: 06/24/2005

LAST NAME: [REDACTED] FIRST NAME: [REDACTED] STATUS: CLOSED
TITLE: [REDACTED] MI: K
ADDRESS: [REDACTED]
CITY: OMAHA STATE: NE ZIP: [REDACTED]
HOME PHONE: [REDACTED]
MODEL YEAR: 2001 MODEL: ESCAPE XLT 4X4
MILEAGE: 100000
DEALER NAME: ANDERSON FORD, INC. SALES CODE: F53025 P & A: 07192
REASON CODE: 0792 LEGAL - ACCIDENT / FIRE
SYMPTOMS: 704145 FIRE/SMOKE VISIBLE FLAME UNDERHOOD

ORIGIN: CACI38 - US CONCERN CASE BASE COMMUNICATION: PHONE
ACTION: 705 - CONTACT ADVANCED TO OGC
DOCUMENT: ANALYST: GPINNOCK PINNOCK GEORGE

DATE: 06/24/2005 TIME: 11.12.20:
ACTION DATA/COMMENTS:

CUSTOMER SAID: [REDACTED] VEH STILL IN DRIVEWAY - VEH
CAUGHT ON FIRE, 06/20/05 AT APPROX 10PM- FIRE DEPT INVEST
IGATING, WE THINK IT'S FROM THE ANTI-LOCK BRAKES- FOUND FIRE
UNDER HOOD OF VEH, HAD TO SAW HOOD OPEN- INS CO NOTIFIED AS
WELL- FIRE HAPPENED IN OUR GARAGE, DID SERIOUS SMOKE DAMA
GE TO HOUSE, NO INJURIES, HUSBAND INHALED LOTS OF SMOKE - H
AD TO SPEND THE NIGHT IN A HOTEL, NO RENTAL VEH SINCE EITHER
- INS HAS NO RENTAL COVERAGE- SAW LOTS OF INFO ON NET/MEDIA
REGARDING FORD VEHICLES CATCHING ON FIRE - WHAT WILL FORD D
O TO HELP ?DEALER SAID: ANDERSON FORD INC.2500 WILDCATLINCOL
N, NE 68521TEL: (402) 458-9800FAX: (712) 642-2679 > NO INP
UTCRC ADVISED: I WILL FORWARD THIS INFORMATION TO THE FORD O
GC DEPARTMENT. YOU WILL BE CONTACTED WITHIN 3-5 BUSINESS DAY
S.



ISSUE LIST

Last Handling Date/ Issue Status	Name/ Reason Desc	Vin/ Case No.	Model Year and Vehicle Line	Issue Type
7/1/2005 CLOSED	[REDACTED] LEGAL - CUSTOMER WAITING FOR ACKNOWLEDGEMENT	1FMYU04181K [REDACTED] 403401755	2001 ESCAPE	02
6/24/2005 CLOSED	[REDACTED] LEGAL - ACCIDENT / FIRE	1FMYU04181K [REDACTED] 403401755	2001 ESCAPE	10

F... 7/5/2005

PE06-048-0305LC

All Action Details for Issue

[Print](#)

VIN: 1FMYU04181K [REDACTED]
Name: [REDACTED]
Symptom Desc: FIRE/SMOKE SMOKE UNDERHOOD
Reason Desc: LEGAL - CUSTOMER WAITING FOR ACKNOWLEDGEMENT
Issue Type: 02 INFORMATION
Year: 2001
Owner Status: Original
Issue Status: CLOSED

Model: ESCAPE Case: [REDACTED]
WSD: 2001-02-19
Primary Phone: [REDACTED]
Secondary Phone: [REDACTED]

Action: CB-IT MAY TAKE 7 DAYS FOR CONSUMER AFFAIRS TO BEGIN INVESTIGATE

Dealer: 07192 ANDERSON FORD, INC.

Origin Desc: US CONCERN CASE BASE

Odometer: 100000 MI

Comm Type: PHONE

Analyst Name: EBRAHIM MOHAMED

Analyst: MEBRAHI2

Action Date: 07/01/2005

Action Time: 09.46.19.904

Action Data: No

Comments CUSTOMER SAID: - THE VEH CAUGHT FIRE WHEN IT WAS PARKED IN THE GARAGE - HAD CALLED THIS CENTER - WAS EXPECTING TO HEAR FROM LEGAL DEPT BUT HAS NOT
DEALER SAID: ANDERSON FORD INC. 2500 WILDCATLINCOLN, NE 68521
CRC ADVISED: THANK YOU FOR CONTACTING US IN RELATION TO YOUR ONGOING CASE. CONSUMER AFFAIRS INVESTIGATIONS MAY TAKE UP TO 7 DAYS TO INITIATE. LET ME ASSURE YOU THAT THIS TYPE OF SITUATION IS A HIGH PRIORITY FOR FORD MOTOR COMPANY. I HAVE VERIFIED YOUR CONTACT INFORMATION TO ENSURE WE CAN CONTACT YOU WHEN FURTHER INFORMATION IS AVAILABLE OR REQUIRED.

7/5/2005

PE06-048-0306LC

All Action Details for Issue

[Print](#)

VIN: 1FMYU04181K [REDACTED] Year: 2001 Model: ESCAPE Case: [REDACTED]
Name: [REDACTED] Owner Status: Original WSD: 2001-02-19
Symptom Desc: FIRE/SMOKE VISIBLE FLAME UNDERHOOD Primary Phone: [REDACTED]
Reason Desc: LEGAL - ACCIDENT / FIRE Secondary Phone:
Issue Type: 10 OGC Issue Status: CLOSED

Action: CONTACT ADVANCED TO OGC

Dealer: 07192 ANDERSON FORD, INC.

Odometer: 100000 MI

Analyst Name: PINNOCK GEORGE

Action Date: 06/24/2005

Comm Type: PHONE

Analyst: GPINNOCK

Action Time: 11.12.20.790

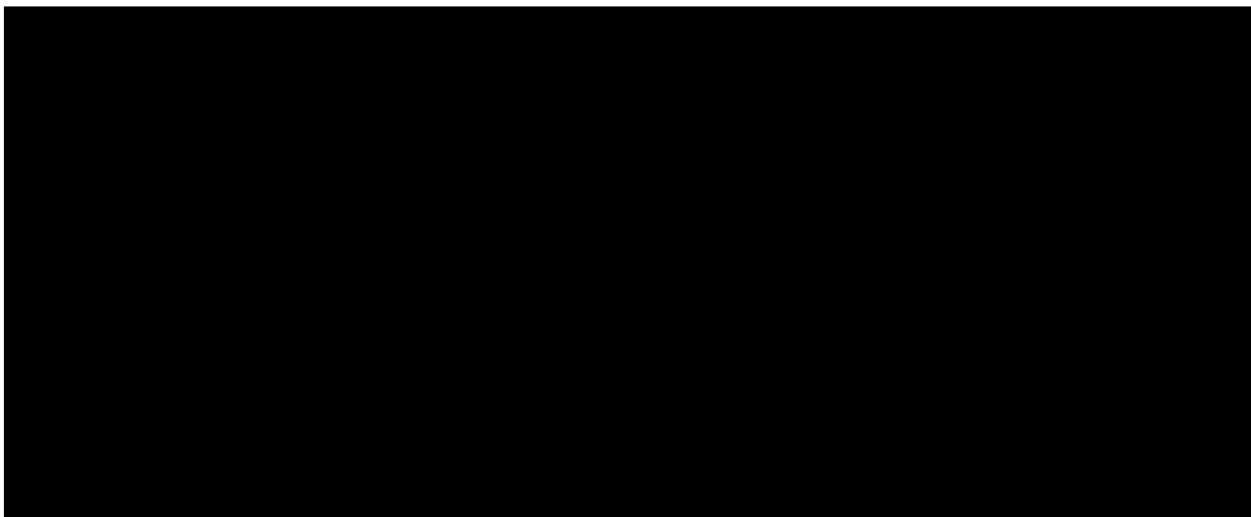
Origin Desc: US CONCERN CASE BASE

Action Data: No

Comments CUSTOMER SAID: - [REDACTED] VEH STILL IN DRIVEWAY - VEH CAUGHT ON FIRE, 06/20/05 AT APPROX 10PM- FIRE DEP'T INVESTIGATING, WE THINK IT'S FROM THE ANTI-LOCK BRAKES- FOUND FIRE UNDER HOOD OF VEH, HAD TO SAW HOOD OPEN- INS CO NOTIFIED AS WELL- FIRE HAPPENED IN OUR GARAGE , DID SERIOUS SMOKE DAMAGE TO HOUSE , NO INJURIES, HUSBAND INHALED LOTS OF SMOKE - HAD TO SPEND THE NIGHT IN A HOTEL, NO RENTAL VEH SINCE EITHER - INS HAS NO RENTAL COVERAGE- SAW LOTS OF INFO ON NET/MEDIA REGARDING FORD VEHICLES CATCHING ON FIRE - WHAT WILL FORD DO TO HELP ?DEALER SAID: ANDERSON FORD INC.2500 WILDCATLINCOLN, NE 68521TEL: (402) 458-9800FAX: (712) 642-2679 > NO INPUTCRC ADVISED: I WILL FORWARD THIS INFORMATION TO THE FORD OGC DEPARTMENT. YOU WILL BE CONTACTED WITHIN 3-5 BUSINESS DAYS.

7/5/2005

PE06-048-0307LC

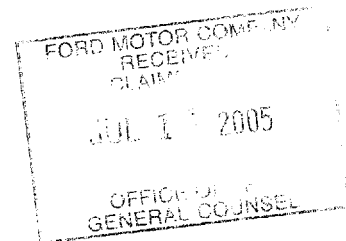


June 30, 2005

JUL 11 2005

Ford Motor Company
Office of General Counsel
Parklane Towers West
Three Parklane Blvd., Suite 400
Dearborn, MI 48126

RE: Claim Number: [REDACTED]
Date of Loss: March 16, 2005
City/State of loss: La Costa, Texas
Insured: [REDACTED]
Vehicle: 2001 Ford Escape
VIN: 1FMYUO3101K [REDACTED]
Mileage: 85,302.



Ford Motor Company,

This notice is to advise of a loss that occurred to our insured vehicle and/or property. The damage was caused by a fire in the left rear portion of the engine compartment. We have the vehicle available for inspection by a representative from Ford. Please contact me on my direct line listed below to set up a time to inspect the vehicle. We are presenting a subrogation claim for our insured's deductible and State Farm's portion paid out.

Our investigation indicates that Ford is responsible for this loss. By virtue of our payment, we are entitled to recover from the responsible party. Please consider this letter as our demand to Ford for reimbursement of \$ 13,725.91.

Any settlement by Ford with State Farm's policyholder with respect to the above described design issue must not prejudice our rights, as subrogor, and shall not be released by the execution of a general release with such policyholder.

In order to assist you in evaluating and processing the subrogation claim we are asserting, we may provide nonpublic personal information about our customer. We are sharing this information to effect, administer, or enforce a transaction authorized by the consumer. However, you are neither authorized nor permitted to: (1) use the customer information we provide for any purpose other than to evaluate and process the subrogation claim or (2) disclose or share the customer information we provide for any purpose other than to evaluate and process the subrogation claim.

Your cooperation is appreciated. If you should have any questions, or would like to set up an appointment to inspect evidence/salvage, please feel free to contact me at (972)732-3149.

Sincerely,

A handwritten signature in black ink, appearing to read 'Pamela S. Davis', written in a cursive style.

Pamela S. Davis
State Farm Mutual Automobile Insurance Company
P.O. Box 799011
Dallas, TX 75379

Enclosures



INVESTIGATIVE CONSULTANTS, INC.

2205 W. Division St. • #G-3 • Arlington, Texas 76012
Metro 817-469-1848 • Local 817-459-0922 • Fax 817-460-4677



INVESTIGATIVE CONSULTANTS, INC.

CAUSE & ORIGIN REPORT

ICI FILE #
CLAIM #:

PREPARED FOR:

STATE FARM INSURANCE COMPANY
REQUESTOR: RICK BAISCH

PREPARED BY:

DAVID J. BRISTOW, CFEL, CVFI
FIRE INVESTIGATOR

All information contained within this report is privileged and confidential. Reports are furnished to our clients only, and release of any and all information contained within them is the sole responsibility of the client.

2205 W. Division St. • #G-3 • Arlington, Texas 76012
Metro 817-469-1848 • Local 817-459-0922 • Fax 817-460-4677

PE06-048-0312LC

C O N F I D E N T I A L

**INVESTIGATIVE CONSULTANTS, INC.
2205 W. DIVISION, SUITE #G-3
ARLINGTON, TEXAS 76012
METRO (817) 469-1848 LOCAL (817) 459-0922**

NAME: [REDACTED] TYPE OF INVESTIGATION:
CLAIM #: [REDACTED] CAUSE & ORIGIN
ICI #: 205-05-101 ACCOUNT #: [REDACTED]
DATE OF LOSS: 3-16-05 REPORT DATED: 6-09-05

VEHICLE LOCATION: REQUESTOR: RICK BAISCH
[REDACTED] PHONE #: [REDACTED]
SAN ANTONIO, TEXAS [REDACTED]

REQUEST: The investigation was authorized on May 2, 2005, by Mr. Rick Baisch, a claims representative with State Farm Insurance Company. The purpose of this investigation was to determine the cause and origin of a fire that occurred on March 16, 2005 in a 2001 Ford Escape.

ENCLOSURES:

1. Recall information from the National Highway Traffic Safety Administration
2. Photographic Documentation

PERSONS CONTACTED:

1. [REDACTED] - The insured
[REDACTED]

INSURED PROPERTY: The insured property consisted of a 2001 Ford Escape. At the time of the examination, the vehicle was bearing a Texas license plate number of [REDACTED]. The VIN plate on the driver's side door identified the vehicle as 1FMYUO3101K [REDACTED].

VEHICLE EXAMINATION: The vehicle examination commenced on May 4, 2005 and was conducted at the Alamo City Auction Pool located at 11275 S. Zarzamora in San Antonio, Texas 78224.

An exterior examination of the vehicle revealed no extensive fire damage to the painted surfaces. However, as shown in photograph #1, there was a considerable amount of soot accumulations and some slight scorching to the painted surfaces of the hood and on the left side of the vehicle. The area damaged, as shown in the photograph, in the front mid portion of the hood was damaged most likely from fire department personnel trying to open the hood to extinguish the fire.

NAME: [REDACTED]
CLAIM #: [REDACTED]

PAGE #: 2

C O N F I D E N T I A L

The lights, lenses and body molding of the vehicle were found to be undamaged by the fire. The window glass in the vehicle was intact and there was no evidence of heat fracturing to the windshields. The four tires on the vehicle, at the time of the inspection, were all inflated and no fire damage was noted.

An examination of the passenger compartment revealed no evidence of fire damage or indications that the fire had progressed to any significance through the fire wall area. The upholstery and other components in the passenger compartment were examined finding that they were in good condition and no fire damage was noted.

An examination of the instrument panel and all of its associated wiring was conducted finding no evidence of electrical failures in the instrument panel area. The stereo system and heat and air controls, as shown in photograph #10, were examined finding them to be in good condition and there was no evidence that either had failed and initiated the fire. The steering column area was also examined finding all of the components were in good condition and the key was attached to the steering column.

While examining the lower left side of the instrument panel it was noted that the hood latch cable was displaced and during the investigation of the engine compartment it was noted that the hood latch cable had been affected by the fire which would not allow the hood latch to open properly.

An examination of the engine compartment revealed the area of most fire damage was confined within the left rear portion of the engine compartment. There was a considerable amount of heat and smoke damage throughout the engine compartment, however, the damage to the combustible products was confined to the left rear of the engine compartment. As shown in photograph #12, someone, prior to this vehicle examination, had moved an electrical component in the engine compartment and laid it upon the air filter housing. However, it was still attached to the wiring harness in the left rear portion of the engine compartment. An examination of the belts, hoses and plastic reservoirs revealed the rubberized and plastic components on the right side of the engine were not significantly fire damaged.

An examination of the battery revealed that the battery casing was still in relatively good condition and the positive battery cable had been disconnected from the battery post. An examination of the battery cables revealed no evidence of electrical failures or faults that could be attributed to initiating the fire. The power distribution center, as shown in photograph #15, was examined finding two fuses that were blown. One fuse was a 15 amp fuse and the other being a 25 amp fuse that supplied protection for the ABS brake system. As shown in photograph #17, during the initial examination of the engine it was noted that a metal plate of an alloy type material was lying on top of the battery. It was evident that the metal plate had evidence of electrical arc conditions from energized conductors. As shown in photograph #18, the electrical component, which was the

NAME: [REDACTED]
CLAIM #: [REDACTED]

PAGE #: 3

C O N F I D E N T I A L

electronic control module for the ABS brake system to be fire damaged and portions of the wiring harness in the ABS control module had electrically faulted and some had melted in two. The circuit board material, as shown in photograph #18, was damaged and there was evidence that there were internal failures within the control unit. Some of the wiring attached to the control unit, as shown in photographs #19 and #20 had electrically faulted and melted in two. There were numerous circuits that were attached to the ABS control unit that had electrically faulted. The various conductors were traced back to a portion of the main wiring harness which is located in the left rear portion of the engine compartment. In examining the wiring, there were numerous electrical faults, as shown in photographs #22 through #24. Some of the circuits had electrically faulted, melted in two and the segments had broken and fallen onto the lower portion of the engine components. Due to the fact of the numerous electrical faults in the circuit to the ABS control unit, no specific circuit could be identified as the circuit that had originally failed. Furthermore, the internal components of the ABS control module was not opened in order not to destroy any evidence before any other interested parties could examine the control unit. The fire was confined to the area of where the ABS unit was located and the electrical faulting to the circuit was attached to and a part of the wiring harness in the engine compartment. The hoses and other components in the area of where the ABS module was located were not severely fire damaged, however, there was some minor damage to the wiring loom to other circuitry in the area. The wiring harness and the ABS control module were placed in a plastic container for preservation.

An examination of the remaining wiring harness throughout the engine compartment was conducted finding no evidence of electrical failures in the wiring harness or in the other electrical appliances in the engine compartment. The power cables from the alternator also appeared to be in good condition.

While examining the engine compartment, the fluid levels of the engine oil and transmission fluid were taken which indicated both were at or near their normal level (refer to photograph #28).

During the course of the investigation, an interview was conducted with [REDACTED] the insured of the 2001 Ford Escape. [REDACTED] stated that the subject vehicle had not been driven for approximately two days and had been setting in his driveway. [REDACTED] stated that he and his family were eating dinner at approximately 6:00 to 6:30 p.m. on the date of the loss when they began to smell some type of odor coming into the residence. [REDACTED] stated that he went outside to check the structure and saw smoke coming from the engine compartment of the 2001 Ford Escape. He stated that when he first saw the smoke it was white/grey in color and then turned dark. [REDACTED] stated that he got a water hose and tried to open the hood but the hood latch would not open the hood. He stated that the La Cost Volunteer Fire Department was summoned to the scene and they arrived at approximately 10 minutes after the call.

NAME: [REDACTED]
CLAIM #: [REDACTED]

PAGE #: 4

CONFIDENTIAL

[REDACTED] stated that in the meantime, he had gotten a water hose and tried to spray water in the engine compartment, however, he could not get it totally extinguished until the fire department arrived. He stated that the La Cost Volunteer Fire Department personnel used a pry bar to open the hood and extinguish the fire. [REDACTED] stated that the fire was confined to the engine compartment and had not spread into to the passenger compartment.

During the interview, I asked [REDACTED] if he had had any maintenance conducted on the vehicle and he stated that there had been no recent maintenance conducted on the vehicle. I asked [REDACTED] if the last time that anyone had driven the vehicle had they reported any instrument lights on in the instrument panel. [REDACTED] stated that he was the last driver of the vehicle and the vehicle had operated properly, however, he stated that there was an engine coolant light on that had come on after they had had the radiator flushed and new coolant installed. [REDACTED] stated that he had approximately 85,000 miles on the vehicle and the coolant was flushed and replaced at approximately 60,000 miles. I also inquired as to the operation of the brakes the last time that he had driven the vehicle and [REDACTED] stated that he could not remember the brakes operating in an erratic fashion. He stated that the vehicle is normally driven by his wife but they have several vehicle and it had not been driven for a couple of days. *

I inquired as to any aftermarket products that had been placed on the vehicle and [REDACTED] stated that there was no aftermarket products on the vehicle and it was all stock equipment.

CONCLUSION: In conclusion, it is my opinion that this fire originated within the left rear portion of the engine compartment. Furthermore, it is my opinion that this fire was the result of a failure in the electronic ABS control module which is mounted in the lower left rear of the engine compartment. As noted in the report text, there were numerous electrical faults in wiring to the control unit as well as evidence of internal failures in the circuit board for the ABS control module. Due to the fact that it was not dismantled, at this time, no determination could be made as to the specific reason why the unit failed. However, it was quite obvious that the fire had originated in the ABS control module and it did not appear that any modifications had been made to the original wiring harness to the control unit.

INVESTIGATION CONDUCTED BY:

David J. Bristow, CFEI, CVFI
Fire Investigator

DJB/wm

PHOTOGRAPH DOCUMENTATION

PHOTO #1: Shows an exterior view of the left front portion of the vehicle. As noted in the photograph, there is some soot accumulations around the hood opening and some physical damage to the front mid portion of the hood, most likely by the fire department trying to open the hood to extinguish the fire.

PHOTO #2: Shows a view of the VIN plate on the driver's side door.

#1



#2

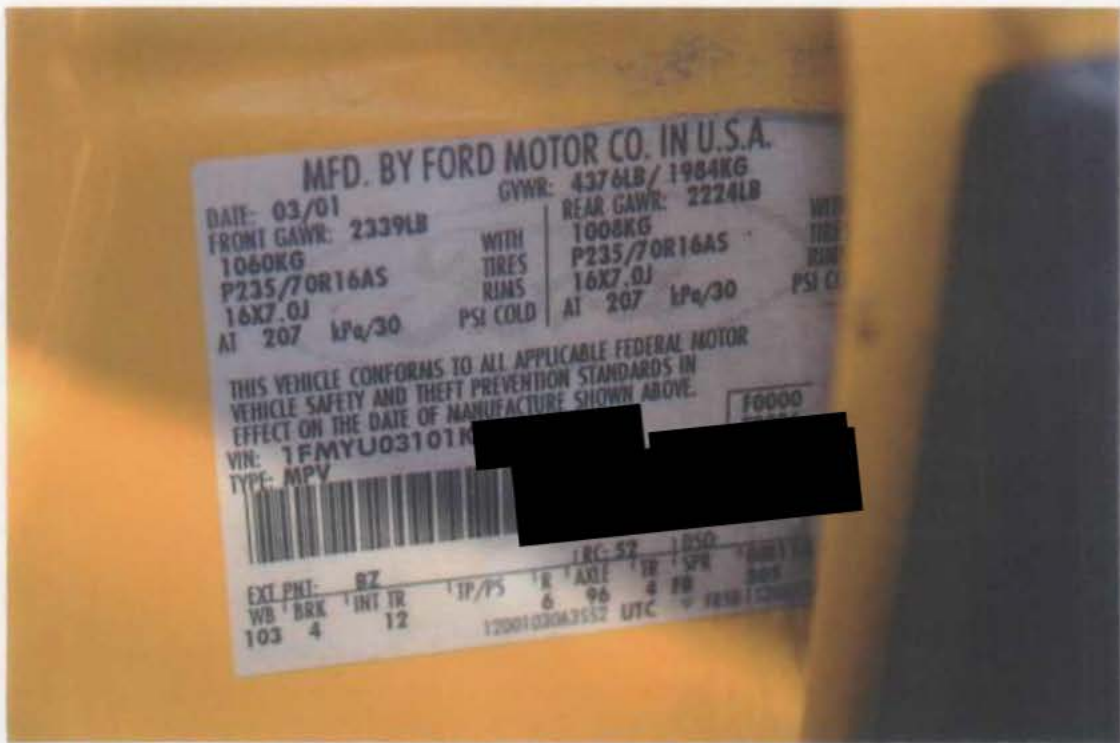


PHOTO #3: Shows an exterior view of the left rear portion of the vehicle.

PHOTO #4: Shows an exterior view of the right rear portion of the vehicle.

#3



#4



PHOTO #5: Shows a view of the right front portion of the vehicle.

PHOTO #6: Shows an overall view of the driver's side of the vehicle. Note there is no fire damage and all of the instruments and switches on the left side of the instrument panel were in good condition.

#5



#6



PHOTO #7: Shows an overall view of the rear passenger compartment area. Note there is no fire damage.

PHOTO #8: Shows an opposing view of the rear passenger compartment which shows no evidence of fire damage. Note the carpet and floor mats were in good condition.

#7



#8



PHOTO #9: Shows an overall view of the right front passenger compartment and instrument panel. As noted in the photograph, there is no evidence of fire damage.

PHOTO #10: Shows a view of the stereo and heat and air conditioning controls. Note neither unit was fire damaged and there were no indications that either had failed.

#9



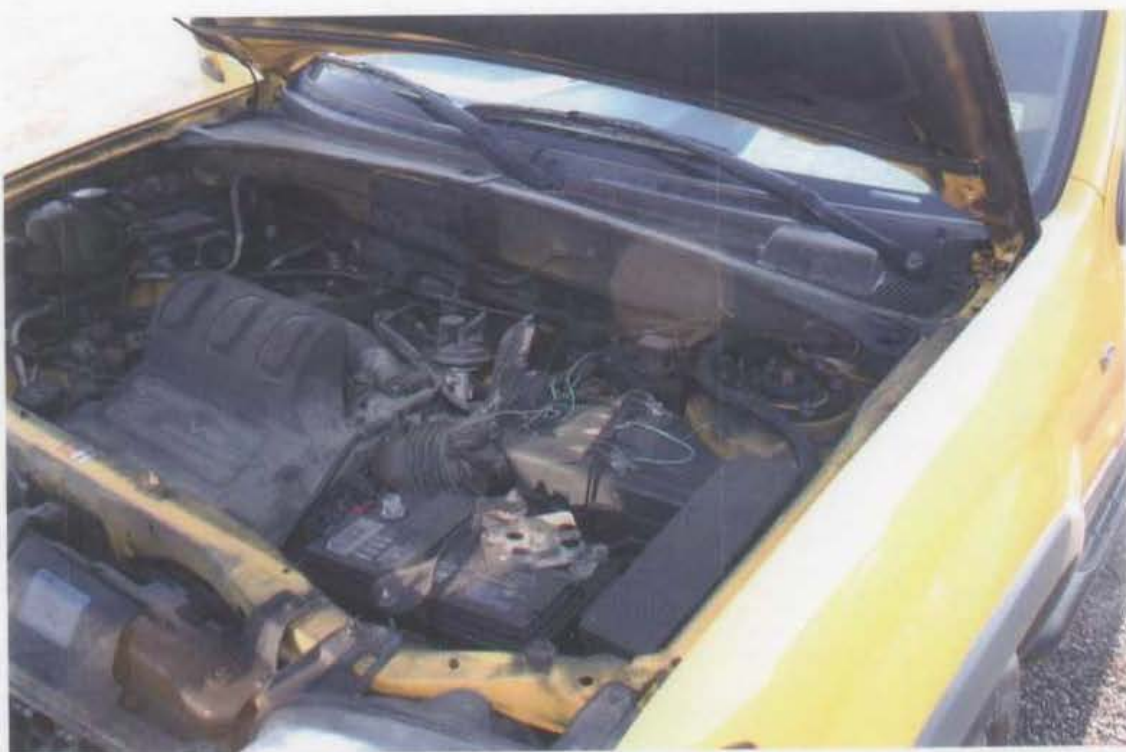
#10



PHOTO #11: Shows an overall view of the left side of the engine compartment during the initial examination.

PHOTO #12: Shows a frontal view of the engine compartment which shows the greater amount of fire damage was in the left rear portion of the engine.

#11



#12

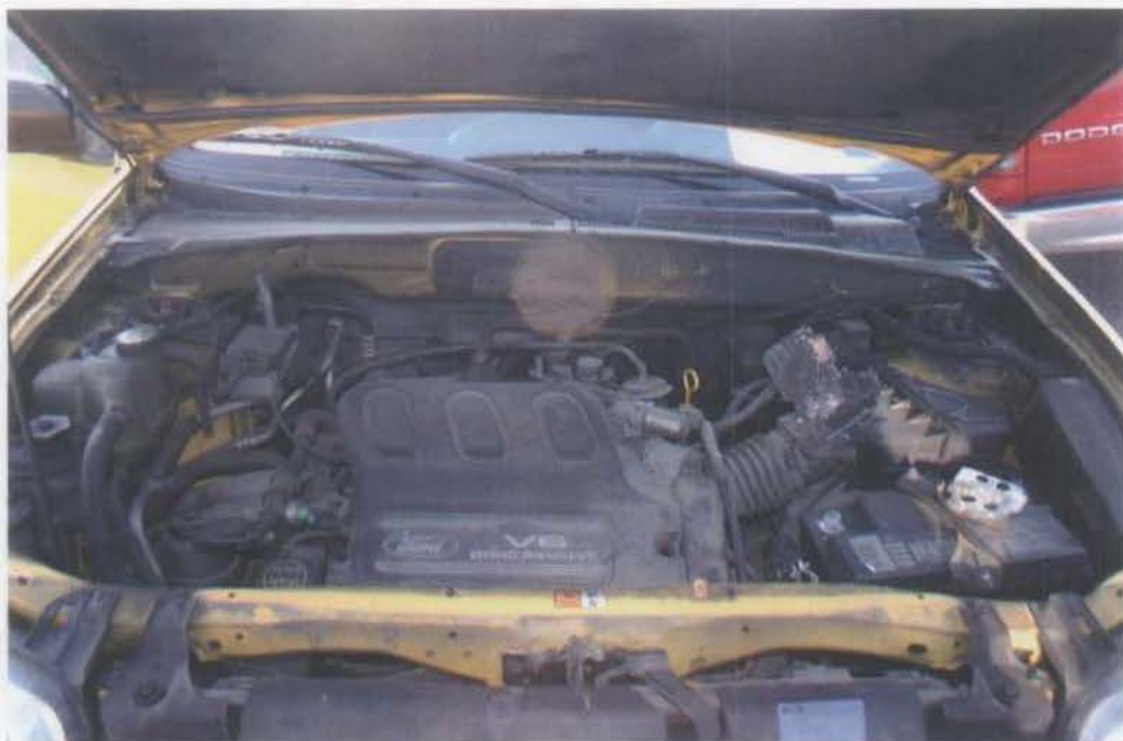


PHOTO #13: Shows an overall view of the right side of the engine compartment.

PHOTO #14: Shows a view of the battery. Note the battery casing was in good condition and there was no fault conditions found on the battery cables or the battery post clamps.

#13



#14



PHOTO #15: Shows a view of the power distribution center. Note there were two fuses found blown.

PHOTO #16: Shows a view of the fuse identification plate. Note the red arrow indicates the two fuses that were blown.

#15



#16



PHOTO #17: Shows a view of a metal plate that was found on the battery that apparently had been attached to the ABS control module that had failed and initiated the fire.

PHOTO #18: Shows a view of portions of the circuit board from where the metal plate would have fit on the circuit board. Note there was evidence of some internal failures in the circuit board material.



#17



#18

PHOTO #19: Shows a closeup view of the ABS control module showing some of the faulted wiring that was attached to the module.

PHOTO #20: Shows an opposing view of the wiring to the ABS control module as it is routed back to the main wiring harness.

#19



#20



PHOTO #21: Shows a view of different circuits as they were separated and the areas of faulting were examined. Note there were numerous circuits that had faulted.

PHOTO #22: Shows a closeup view of some of the circuits to the ABS control module that had electrically faulted and large nodules of melted copper were on the ends of the conductors. Note this is a closeup view of Photograph #21.

#21



#22



PHOTO #23: Shows a view of one segment of wiring that was recovered from the lower engine compartment where the conductors had faulted and melted in two.

PHOTO #24: Shows a closeup view of the circuit that had electrically fused together with another circuit and melted in two. Note this is a closeup view of Photograph #23.

#23



#24



PHOTO #25: Shows an overall view of the left rear portion of the engine compartment which shows the greatest extent of fire damage was in this area.

PHOTO #26: Shows a closeup view of the engine compartment showing some of the wiring that was routed to the ABS control module. Note most of the damage was confined to the module and the wiring.



#26



#25

PHOTO #27: Shows a view of the faulted wiring in the ABS control module as it was placed in a plastic container. Note the plastic container was taped for preservation of evidence.

PHOTO #28: Shows a view of the engine oil and transmission fluid dipsticks which shows both to be at or near their normal level.

#27



#28

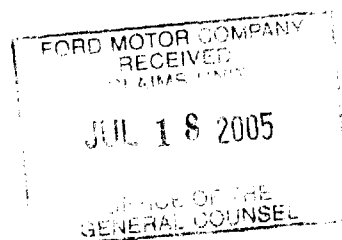




JUL 18 2005

Monday, July 11, 2005

FORD MOTOR COMPANY
PARKLANE TOWERS WEST #300
3 PARKLANE BLVD.
DEARBORN, MI 48126



Re: PRODUCT DEFECT CAUSED VEHICLE FIRE AND RESULTING DAMAGES.

VIN: 1FMYU04182K [REDACTED]
Year: 2002
Make: FORD
Model: ESCAPE
Our Insured: [REDACTED]
Address: [REDACTED], NEBRASKA CITY, NE [REDACTED]
Phone No.: [REDACTED]
Our Claim No: [REDACTED]
Date of Loss: 5-26-05
Damages: \$ 5,213.46

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 \$5,213.46 to my attention, payable to [REDACTED], and mail to my attention at [REDACTED] Richmond Hts., OH 4 [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 Northern Insurance Company

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

PE06-048-0347LC

IN THE DISTRICT COURT OF OTEO COUNTY, NEBRASKA

2005 NOV 18 AM 8:20

JANIS A. REGE, CLERK

[REDACTED])
Plaintiff,)
vs.)
THE FORD MOTOR COMPANY,)
Defendant.)
CASE NO.)
COMPLAINT)

COMES NOW the Plaintiff [REDACTED] and for his cause of actions against Defendant Ford Motor Company, states and alleges as follows:

I.

That at all times material hereto, Plaintiff has been a resident of Oteo County, Nebraska, and the owner of a 2002 Ford Escape XLT SUV, VIN number 1FMYU04182K [REDACTED] that at all times material hereto, Defendant Ford Motor Company has been a foreign corporation doing business in the State of Nebraska, and the manufacture of the vehicle owned by Plaintiff described above.

II.

That on or about May 26, 2005 at 1:10 p.m., Plaintiff's vehicle was parked in the West parking lot of the [REDACTED] in Nebraska City, Nebraska when it caught fire and burned; and that the engine to the Plaintiff's vehicle was not running at the time when the vehicle caught fire.

FIRST CAUSE OF ACTION
(Negligence)

III.

That the Defendant Ford Motor Company was negligent in the design of this 2002 Ford Escape XLT SUV and in failing to properly insulate the electrical system and other potential ignition sources from combustible materials in this vehicle's engine.

SECOND CAUSE OF ACTION
(Warranty)

IV.

That the 2002 Ford Escape XLT SUV manufactured by the Defendant Ford Motor Company was defective in that it was improperly designed by failing to properly insulate the electrical system and other ignition sources in the vehicle's engine from combustible materials, and that this defect constitutes a breach of the warranty of merchantability imposed on the Defendant Ford Motor Company; and that this breach of the warranty caused the fire to damage the Plaintiff's vehicle in this instance.

THIRD CAUSE OF ACTION
(Product Liability)

V.

That the 2002 Ford Escape XLT SUV manufactured by the Defendant Ford Motor Company and purchased by the Plaintiff was defective in that the electrical system and other ignition sources were not properly insulated in the engine of the SUV from combustible materials; that this defect was present when Defendant Ford Motor Company placed this vehicle into the stream of commerce and when said vehicle was purchased by that Plaintiff; that the defect described above was the proximate cause of the fire damage to the Plaintiff's vehicle, and that the Defendant is liable to the Plaintiff for this damage under the Doctrine of Product Liability.

VI.

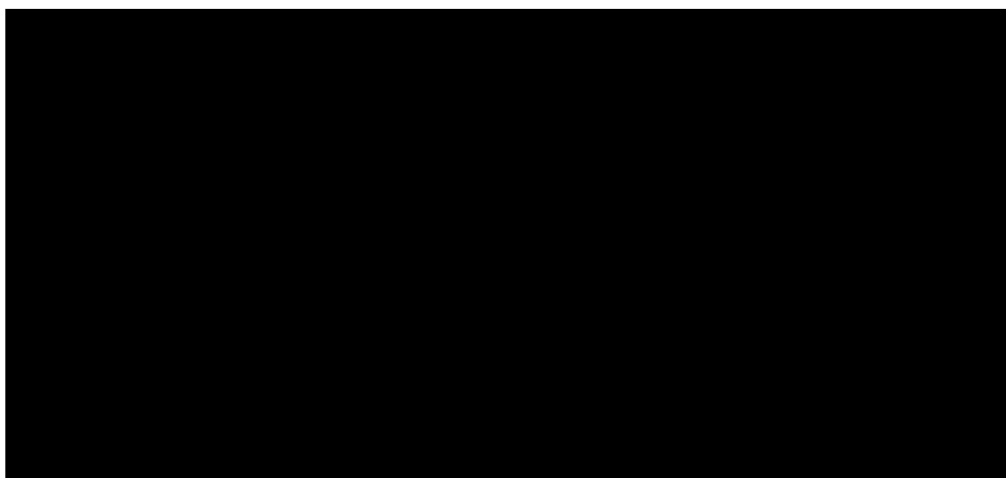
That the Plaintiff sustained damages as a result of this fire in the sum of \$9,219.85; that due demand has been made upon Defendant Ford Motor Company for these damages, but that the Defendant has failed and refused to reimburse the Plaintiff in the amount requested.

WHEREFORE, Plaintiff [REDACTED], prays for judgment against the Defendant Ford Motor Company on all three of his causes of actions in the sum of \$9,219.85, plus Plaintiff's taxable court costs.

Dated this 14 day of November, 2005.

WILLIAM J. MULDOON, Plaintiff,

By: Thomas J. Walsh, Jr.
Thomas J. Walsh, Jr. #16479
WALSH LAW, P.C.
Old Orchard West
13304 West Center Road, #222
Omaha, Nebraska 68144
Phone : (402) 697-1161
Attorneys for Plaintiff



BEGINNING OF CONTACT
03/24/2006

VOICE OF THE CUSTOMER TRACKING SYSTEM

08.00.14

=====

REGION:		INQUIRY ISSUE		CASE NBR:	
VIN:	1FMCU04102K	ZONE:		OPENED:	03/23/2006
		ENGINE:	1	CLOSED:	03/23/2006
		VEH TYPE:	T		

=====

LAST NAME:		FIRST NAME:		STATUS:	CLOSED
TITLE:				MI:	B
ADDRESS:					
CITY:	OCEAN CITY	STATE:	NJ	ZIP:	
HOME PHONE:					
MODEL YEAR:	2002	MODEL:	ESCAPE XLT 4X4		
MILEAGE:	2000				
DEALER NAME:		SALES CODE:		P & A:	
REASON CODE:	4355 CALLBACK ESCALATION				
SYMPTOMS:	- 2ND+ - LEGAL				

=====

ORIGIN: CACI38 - US CONCERN CASE BASE COMMUNICATION: PHONE
ACTION: 1113 - 2ND - CALLBACK ESCALATION TO TEAM LEADER
DOCUMENT: ANALYST: ILAU2 LAU IRENE

DATE: 03/23/2006 TIME: 17.14.05 :
ACTION DATA/COMMENTS:

CUSTOMER SAID: -SAYS THAT SHE E-MAILED US ABOUT THE FIRE THAT HAD CAUSED APPROX \$9000 WORTH DAMAGE HE CLAIM HAD BEEN PAID BY THE INSURANCE COMPANY BUT CUST IS ASKING FORD TO COVER THE REST OF HER EXPENSES. IE HOTEL, ETC. CUST HAD SOME DAMAGE TO PROPERTY (AS PER HISTORICALS) -CURRENTLY WAITING FOR FORD LEGAL DEPT TO CONTACT HER ABOUT HER CLAIM, SAYS THAT SMOKE PROBLEM WAS DUE TO ELECTRICAL PROBLEM WITH VEHICLE AND THAT IT WAS NOT DUE TO ANYTHING SHE DID (ALLEGING FORD IS RESPONSIBLE) . -NO ONE HAS GOTTEN BACK TO HER YET ABOUT HER CLAIM AND IS CALLING BACK.DEALER SAID: KEYSER & MILLER FORD INC8 EAST MAIN STREET COLLEGEVILLE, PA 19426TEL: (610) 489-9366CRC ADVISED: I APOLOGIZE THAT WE HAVE NOT MET YOUR EXPECTATION. PLEASE HOLD WHILE I ESCALATE YOU TO MY MANAGER. -PLEASE ALLOW 3 TO 5 BUSINESS DAYS FOR A MGR TO FOLLOW UP WITH YOU.

CONSUMER AFFAIRS

03/24/2006 FAX0786

PE06-048-0352LC

ISSUE LIST

Last Handling Date/ Issue Status	Name/ Reason Desc	Vin/ Case No.	Model Year and Vehicle Line	Issue Type
8/4/2005 CLOSED	[REDACTED] MISC INQUIRY - CHANGE OF ADDRESS	1FMCU04102K0 334102135	2002 ESCAPE	02
8/4/2005 CLOSED	[REDACTED] CAC RELATED - F/M CSR FOLLOWING CONTACT	1FMCU04102K0 334102135	2002 ESCAPE	02
8/1/2005 CLOSED	[REDACTED] LEGAL - ACCIDENT / FIRE	1FMCU04102K0 334102135	2002 ESCAPE	10

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8/11/2005

PE06-048-0353LC

All Action Details for Issue

[Print](#)

VIN: 1FMCU04102K [REDACTED] Year: 2002 Model: ESCAPE Case: [REDACTED]
Name: [REDACTED] Owner Status: Original WSD: 2002-07-26
Symptom Desc: Primary Phone: [REDACTED]
Reason Desc: MISC INQUIRY - CHANGE OF ADDRESS Secondary Phone: [REDACTED]
Issue Type: 02 INFORMATION Issue Status: CLOSED

Action: UPDATE CUSTOMER ADDRESS OR PHONE NUMBER
Dealer: 01492 KEYSER & MILLER FORD INC Origin Desc: MANUAL - PHONE CSR
Odometer: 1 MI Comm Type: PHONE
Analyst Name: TANEJA JITENDRA Analyst: JTANEJA
Action Date: 08/04/2005 Action Time: 13.52.11.961 Action Data: No

Caller Information If Different From Vehicle Owner:

First Name	Middle Initial	Last Name	Day Phone	Relationship
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	SPOUSE

Comments CUSTOMER SAID: =WANTS TO MAKE SURE THAT THE ADDRESS IS CORRECT ON THEIR PROFILE=STATES THAT THE LETTER WHICH WAS SENT OUT TO THEM BY FORD WAS NOT SENT AT THE ABOVE MENTIONED ADDRESS AND WANTS FORD TO SEND OUT ANY FORWARD COMMUNICATION TO THEIR ADDRESS ON THIS PROFILE WHICH IS: [REDACTED] OCEAN CITY, NEW JERSEY - [REDACTED] DEALER SAID: =NONECRC ADVISED: (NOTE TO CSR - THIS MAC IS TO BE USED FOR UPDATING CUSTOMER INFORMATION ONLY. DO NOT USE FOR DOCUMENTING ANY OTHER ISSUES.)=ADVISED CUST THAT THE ADDRESS IS THE SAME ON THEIR PROFILE WHICH THEY HAVE MENTIONED AND CONFIRMED THE SAME

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8/11/2005

PE06-048-0354LC

All Action Details for Issue

[Print](#)

VIN: 1FMCU04102K [REDACTED]
Name: [REDACTED]
Symptom Desc: GENERAL INQUIRIES REQUEST/NON-VEHICLE RELATED
Reason Desc: CAC RELATED - F/M CSR FOLLOWING CONTACT
Issue Type: 02 INFORMATION

Year: 2002
Owner Status: Original
Issue Status: CLOSED

Model: ESCAPE Case: [REDACTED]
WSD: 2002-07-26
Primary Phone: [REDACTED]
Secondary Phone: [REDACTED]

Action: CALLBACK ADD ADDITIONAL COMMENTS

Dealer: 01492 KEYSER & MILLER FORD INC

Origin Desc: US CONCERN CASE BASE

Odometer: 45000 MI

Comm Type: PHONE

Analyst Name: LINCOLN LAZARUS

Analyst: LLINCOL1

Action Date: 08/04/2005

Action Time: 11.30.57.112

Action Data: No

Caller Information If Different From Vehicle Owner:

First Name	Middle Initial	Last Name	Day Phone	Relationship
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	SPOUSE

Comments CUSTOMER SAID: ===AS PER HISTORICALS DATED 8/1/2005===NO ONE CALLED FROM LEGAL DEPT-NEED
UPDETEALER SAID: NONECRC ADVISED: PLEASE ALLOW THE REQUESTED TIME FOR THE FOLLOW UP TO OCCUR SO
THAT YOUR ISSUE MAY BE PROPERLY ADDRESSED.

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All Action Details for Issue

Print

VIN: 1FMCU04102K [REDACTED] Year: 2002
Name: [REDACTED] Owner Status: Original
Symptom Desc: FIRE/SMOKE VISIBLE FLAME UNDERHOOD
Reason Desc: LEGAL - ACCIDENT / FIRE
Issue Type: 10 OGC Issue Status: CLOSED

Model: ESCAPE Case: [REDACTED]
WSD: 2002-07-26
Primary Phone: [REDACTED]
Secondary Phone: [REDACTED]

Action: CONTACT ADVANCED TO OGC
Dealer: 01492 KEYSER & MILLER FORD INC
Odometer: 45000 MI
Analyst Name: MARCELLE JOANNE
Action Date: 08/01/2005

Comm Type: PHONE
Analyst: JMARCEL5
Action Time: 09.16.49.408

Origin Desc: US CONCERN CASE BASE

Action Data: No

Caller Information If Different From Vehicle Owner:

First Name	Middle Initial	Last Name	Day Phone	Relationship
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	SPOUSE

Comments CUSTOMER SAID: =CUST SAYS THE VEH CAUGHT ON FIRE WED 27TH OF JULY AT 4:00PM IN THE AFTERNOON.=CUST SAYS THERE WAS VISIBLE FLAMES, THE FLAMES WAS COMING FROM UNDER THE HOOD.=CUST SAYS THERE WAS ALSO FLAMES COMING FROM UNDER THE WHEEL WELL.=CUST SAYS THE GARAGE WAS ALSO BURNT DUE TO THE FIRE.=CUST SAYS BRAND NEW BIKES WERE ALSO DAMAGED.=CUST SAYS NO ONE WAS HURT, THE FIRE DEPT CAME OUT POLICE AND FIRE REPORT WAS FILED.=CUST SAYS THE INSURANCE CO. WAS NOTIFIED, NHTSA WAS SENT PHOTO OF THE ACCIDENT.=CUST SAYS CUST IS CURRENTLY IN A HOTEL BECAUSE THEY HAVE TO CLEAN UP THE HOME.=CUST SAYS THE VEH OPERATING PERFECTLY, HOWEVER THE CHECK ENGINE WAS ON AND CUST DID CONTACT THE DLRSHIP ON THE MATTER KEYSER & MILLER FORD, AND WAS TOLD IF THE VEH IS RUNNING FINE CUST DOES NOT NEED TO BRING THE VEH IN AT THIS TIME THIS WAS 2 WEEKS PRIOR TO THE FIRE OCCURED.=CUST SAYS THE VEH IS AT AN AUTO REPAIR SHOP IN PA HILTEBIANDTS AUTO BODY SHOP=CUST SAYS WILL LIKE TO KNOW WHAT POSITION ON THIS SITUATION.DEALER SAID: KEYSER & MILLER FORD INC 8 EAST MAIN STREET COLLEGEVILLE, PA 19426PHONE: (610)489-9366CRC ADVISED: I WILL FORWARD THIS INFORMATION TO THE FORD OGC DEPARTMENT. YOU WILL BE CONTACTED WITHIN 3-5 BUSINESS DAYS.=CSR ADVISED CUST OF THE ABOVE.

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8/11/2005

PE06-048-0356LC

[REDACTED]
Collegeville, Pa. [REDACTED]

August 19, 2005

William Clay Ford Jr.
Board of Directors
Ford Motor Company
P.O. Box 685
Dearborn, Mi 48126-0685

SEP 02 2005

Dear Mr. Ford,

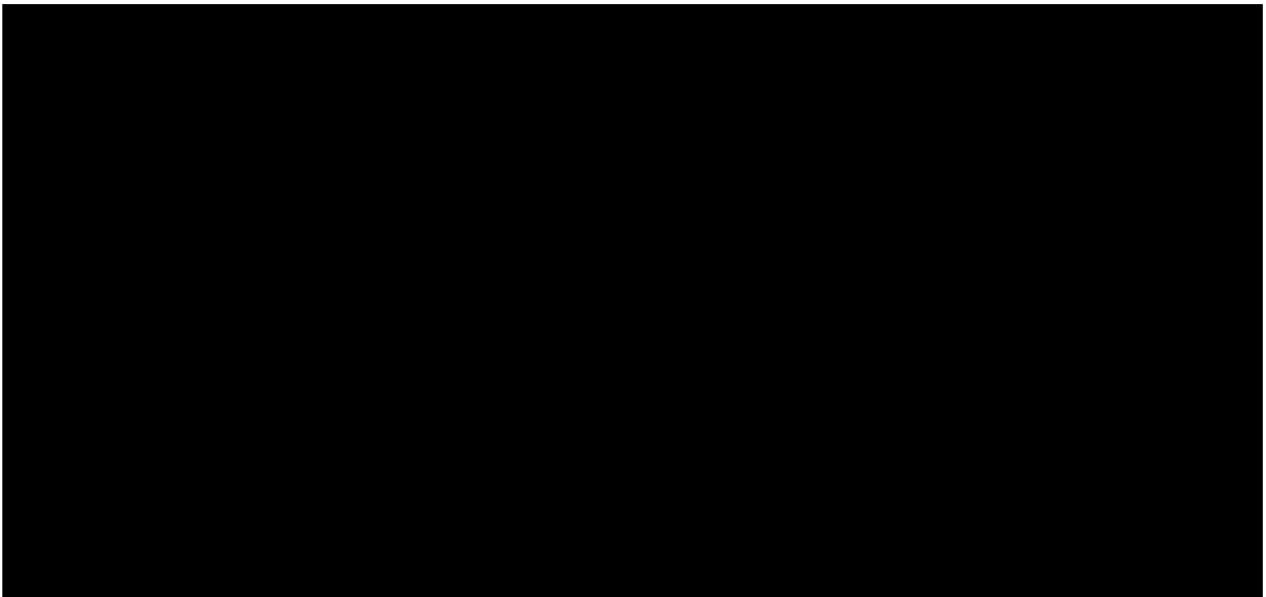
My 2002 Ford Escape Vin# 1FMCU04102K [REDACTED] caught fire on July 27, 2005. The car up to this date was operating normally. My new husband of only 11 days and I were in the house at 4:00 in the afternoon three days after our honeymoon, when I smelled something like rubber burning in the house. Upon opening the attached garage door, we were shocked to see a black wall of smoke. Fortunately our garage was fire proof but we live in a condominium community and things could have been much worse.

I have always had a Ford. I have never had a problem before this. This is a serious problem. We could have been killed. In fact the whole row of condominiums could have suffered serious loss as well. We ended up with our new garage being gutted. We lost our brand new bicycles and other items that were stored in the garage or car. We lost the car. The engine was melted from the fire! The smoke damage throughout the house was a big problem. We had to remove all our clothing, have all our new TV's and computers removed and professionally cleaned. We had to have the vents in the house cleaned and all the furniture as well. We are now working with the insurance companies (we have two because of being in a Condominium Association) to see who picks up the bill.

We went on the web site "Ford Fires.Com" and to our horror, there were a lot of others with similar problems. My reason for writing you is the question, why wouldn't you send out a recall notice to warn us of a potential hazard? According to the web, The Ford Company was aware of a faulty cruise control switch and wanted to save the \$20 in order to fix it. We have reported this sad situation to the NHTSA (claim # [REDACTED] and to Ford (see attached letter). I am disappointed in Ford. I thought that I was driving a safe car. If we can start legal action we will. I want others to be safe. At least there is one person that cares for others.

All we would like is for Ford to pick up our out of pocket expenses and to send recall notices to all others. This was not our fault. This was your fault. Please help us out and do the right thing. Support your friends that have been standing by your cars for years. Show us that you really care.

Sincerely Yours,
[REDACTED]



ISSUE LIST

Last Handling Date/ Issue Status	Name/ Reason Desc	Vin/ Case No.	Model Year and Vehicle Line	Issue Type
8/9/2005 CLOSED	[REDACTED] LEGAL - CUSTOMER WAITING FOR ACKNOWLEDGEMENT	1FMYU04181KA 403401755	[REDACTED] 001 ESCAPE	02
7/11/2005 CLOSED	[REDACTED] AWA - CAC SUPPORTS FIELD'S DECISION	1FMYU04181KA 403401755	[REDACTED] 001 ESCAPE	02
7/1/2005 CLOSED	[REDACTED] LEGAL - CUSTOMER WAITING FOR ACKNOWLEDGEMENT	1FMYU04181KA 403401755	[REDACTED] 001 ESCAPE	02
6/24/2005 CLOSED	[REDACTED] LEGAL - ACCIDENT / FIRE	1FMYU04181KA 403401755	[REDACTED] 001 ESCAPE	10

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All Action Details for Issue

Print

VIN: 1FMYU04181K [REDACTED] Year: 2001
Name: [REDACTED] Owner Status: Original
Symptom Desc: FIRE/SMOKE SCORCHED/BURNT UNDERHOOD
Reason Desc: LEGAL - CUSTOMER WAITING FOR ACKNOWLEDGEMENT
Issue Type: 02 INFORMATION Issue Status: CLOSED

Model: ESCAPE Case: [REDACTED]
WSD: 2001-02-19
Primary Phone: [REDACTED]
Secondary Phone: [REDACTED]

Action: CB-ADVISE CUST WE WILL NOTIFY THE DEPT SOMEBODY WILL BE IN TOUCH

Dealer: 09913 BILL SUMMERS FORD OF OGALLALA

Origin Desc: US CONCERN CASE BASE

Odometer: 100000 MI

Comm Type: PHONE

Analyst Name: NUNEZ, TODD

Analyst: TNUNEZ2

Action Date: 08/09/2005

Action Time: 11.31.49.935

Action Data: No

Comments CUSTOMER SAID: -CUSTOMER IS STILL WAITING TO HEAR A RESPONSE FROM THE LEGAL DEPT.-PER HISTORICALS, CUST CALLED IN JUNE TO REPORT VEH FIRE.DEALER SAID: -NONECRC ADVISED: THANK YOU FOR PROVIDING US WITH THIS INFORMATION IN RELATION TO YOUR CASE. I WILL FORWARD THIS TO OUR CONSUMER AFFAIRS DEPARTMENT, AND I HAVE REQUESTED THAT THEY CONTACT YOU WITHIN TWO BUSINESS DAYS.=====VERIFIED CUST INFO AND CHANGED ADDRESS.-FAILED TO VERIFY LOCAL DLRSH, USED DLR IN HISTORICALS.-DID NOT GET DETAILS FROM ACCIDENT BECAUSE CUST WAS FRUSTRATED ABOUT NOT RECEIVING A RETURN CALL AND DID NOT WANT TO ANSWER ANY OF MY QUESTIONS.

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All Action Details for Issue

Print

VIN: 1FMYLJ04181K
Name: [REDACTED]
Symptom Desc: GENERAL INQUIRIES REQUEST/NON-VEHICLE RELATED
Reason Desc: AWA - CAC SUPPORTS FIELD'S DECISION
Issue Type: 02 INFORMATION
Year: 2001
Owner Status: Original
Issue Status: CLOSED

Model: ESCAPE Case: 4 [REDACTED]
WSD: 2001-02-19
Primary Phone: [REDACTED]
Secondary Phone: [REDACTED]

Action: CB-SUPPORT DEALERSHIP'S/REGION'S POSITION

Dealer: 09913 BILL SUMMERS FORD OF OGALLALA

Origin Desc: US CONCERN CASE BASE

Odometer: 1 MI

Comm Type: PHONE

Analyst Name: LINCOLN LAZARUS

Analyst: LLINCOL1

Action Date: 07/11/2005

Action Time: 13.14.46.169

Action Data: No

Comments CUSTOMER SAID: ==AS PER HISTORICALS DATED 7/11/2005=====FINANCE MGR BOBBE CALLED ON BEHALF OF CUST, FROM DLR BILL SUMMERS FORD OF OGALLALA 602 WEST 1ST STREET, OGALLALA, NE, 69153 PRIMARY PHONE: (308) 284-2001 PRIMARY FAX: 308-284-6502 -BOBBI SAID SHE WOULD LIKE TO SPEAK WITH SUPERVISOR MARTIN WHO IS SUPPOSED TO CALL CUST DEALER SAID: NONE CRC ADVISED: SUPPORT DEALERSHIP/FIELD/DRP/LEGAL DECISION. PROVIDE COMMENTS IF AVAILABLE THANK YOU FOR CONTACTING FORD MOTOR COMPANY IN REGARDS TO THIS ISSUE. OUR RECORDS INDICATE THAT A DECISION HAS BEEN MADE AND THE CRC CAN NOT OVERTURN THIS DECISION. HOWEVER, TO ENSURE OUR RECORDS ARE COMPLETE WE HAVE DOCUMENTED YOUR FEEDBACK. (NOTE TO CSR: SUPPORT DLR/REGION DECISION.)-NO DOCUMENTATION THAT SUPERVISOR MARTIN WILL FOLLOW UP WITH CUST IN HISTORICALS-ADVISED AS PER PREVIOUS CSR'S COMMENTS IN HISTORICALS DATE 7/11/2005 AS FOLLOWS==THANK YOU FOR CONTACTING FORD MOTOR COMPANY IN RELATION TO THIS ISSUE. A SECOND WILL LETTER BE SENT FROM THE OFFICE OF GENERAL COUNSEL. WHEN YOU RECEIVE THE LETTER PLEASE PROVIDE THE REQUESTED INFORMATION AND RETURN TO THE OFFICE OF GENERAL COUNSEL. UPON RECEIPT OGC WILL REVIEW THE INFORMATION AND DETERMINE THE APPROPRIATE ACTION.

Ford Confidential

All Action Details for Issue

[Print](#)

VIN: 1FMYU04181K [REDACTED] Year: 2001
Name: [REDACTED] Owner Status: Original
Symptom Desc: FIRE/SMOKE SMOKE UNDERHOOD
Reason Desc: LEGAL - CUSTOMER WAITING FOR ACKNOWLEDGEMENT
Issue Type: 02 INFORMATION Issue Status: CLOSED

Model: ESCAPE Case: [REDACTED]
WSD: 2001-02-19
Primary Phone: [REDACTED]
Secondary Phone: [REDACTED]

Action: CB-IT MAY TAKE 7 DAYS FOR CONSUMER AFFAIRS TO BEGIN INVESTIGATE

Dealer: 07192 ANDERSON FORD, INC.

Origin Desc: US CONCERN CASE BASE

Odometer: 100000 MI

Comm Type: PHONE

Analyst Name: EBRAHIM MOHAMED

Analyst: MEBRAHI2

Action Date: 07/01/2005

Action Time: 09.46.19.904

Action Data: No

Comments CUSTOMER SAID: - THE VEH CAUGHT FIRE WHEN IT WAS PARKED IN THE GARAGE - HAD CALLED THIS CENTER - WAS EXPECTING TO HEAR FROM LEGAL DEPT BUT HAS NOT DEALER SAID: ANDERSON FORD INC. 2500 WILDCAT LINCOLN, NE 68521 CRC ADVISED: THANK YOU FOR CONTACTING US IN RELATION TO YOUR ONGOING CASE. CONSUMER AFFAIRS INVESTIGATIONS MAY TAKE UP TO 7 DAYS TO INITIATE. LET ME ASSURE YOU THAT THIS TYPE OF SITUATION IS A HIGH PRIORITY FOR FORD MOTOR COMPANY. I HAVE VERIFIED YOUR CONTACT INFORMATION TO ENSURE WE CAN CONTACT YOU WHEN FURTHER INFORMATION IS AVAILABLE OR REQUIRED.

Ford Confidential

All Action Details for Issue

[Print](#)

VIN: 1FMYU04181K [REDACTED]
Name: [REDACTED]
Symptom Desc: FIRE/SMOKE VISIBLE FLAME UNDERHOOD
Reason Desc: LEGAL - ACCIDENT / FIRE
Issue Type: 10 OGC
Year: 2001
Owner Status: Original
Issue Status: CLOSED

Model: ESCAPE
WSD: 2001-02-19
Primary Phone: [REDACTED]
Secondary Phone: [REDACTED]
Case: [REDACTED]

Action: CONTACT ADVANCED TO OGC
Dealer: 07192 ANDERSON FORD, INC.
Odometer: 100000 MI
Analyst Name: PINNOCK GEORGE
Action Date: 06/24/2005

Comm Type: PHONE
Analyst: GPINNOCK
Action Time: 11.12.20.790

Origin Desc: US CONCERN CASE BASE

Action Data: No

Comments CUSTOMER SAID: [REDACTED] VEH STILL IN DRIVEWAY - VEH CAUGHT ON FIRE, 06/20/05 AT APPROX 10PM- FIRE DEP'T INVESTIGATING, WE THINK IT'S FROM THE ANTI-LOCK BRAKES- FOUND FIRE UNDER HOOD OF VEH, HAD TO SAW HOOD OPEN- INS CO NOTIFIED AS WELL- FIRE HAPPENED IN OUR GARAGE , DID SERIOUS SMOKE DAMAGE TO HOUSE , NO INJURIES, HUSBAND INHALED LOTS OF SMOKE - HAD TO SPEND THE NIGHT IN A HOTEL, NO RENTAL VEH SINCE EITHER - INS HAS NO RENTAL COVERAGE- SAW LOTS OF INFO ON NET/MEDIA REGARDING FORD VEHICLES CATCHING ON FIRE - WHAT WILL FORD DO TO HELP ?DEALER SAID: ANDERSON FORD INC.2500 WILDCATLINCOLN, NE 68521TEL: (402) 458-9800FAX: (712) 642-2679 > NO INPUTCRC ADVISED: I WILL FORWARD THIS INFORMATION TO THE FORD OGC DEPARTMENT. YOU WILL BE CONTACTED WITHIN 3-5 BUSINESS DAYS.

Ford Confidential

New

[REDACTED]

Monday, July 11, 2005

FORD MOTOR COMPANY
PARKLANE TOWERS WEST #300
3 PARKLANE BLVD.
DEARBORN, MI 48126

Re: PRODUCT DEFECT CAUSED VEHICLE FIRE AND RESULTING DAMAGES.

VIN: IFMYU04181K [REDACTED]

Year: 2001

Make: FORD

Model: ESCAPE

Our Insured: [REDACTED]

Address: [REDACTED]

CRETE, NE [REDACTED]

Phone No.: [REDACTED]

Our Claim No: [REDACTED]

Date of Loss: 6-20-05

Damages: \$ 13,320.00

FORD MOTOR COMPANY
RECEIVED
JUL 13 2005
GENERAL COUNSEL

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 [REDACTED] damages and those of [REDACTED] 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 \$13,320.00 to my attention, payable to [REDACTED] and mail to my attention a [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.

[REDACTED]

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

IN THE DISTRICT COURT OF SALINE COUNTY, NEBRASKA

[REDACTED])
)
) Plaintiff,)
 vs.) COMPLAINT
)
) THE FORD MOTOR COMPANY,)
)
) Defendant.)

COMES NOW the Plaintiff [REDACTED], and for her causes of actions against Defendant Ford Motor Company, states and alleges as follows:

I.

That at all times material hereto, Plaintiff has been a resident of Saline County, Nebraska, and the owner of a 2001 Ford Escape SUV, VIN number 1FMYU04181K [REDACTED]; that at all times material hereto, Defendant Ford Motor Company has been a foreign corporation doing business in the State of Nebraska, and the manufacture of the vehicle owned by Plaintiff described above.

II.

That on or about June 20, 2005 at 9:30 p.m., Plaintiff's vehicle was parked in Plaintiff's garage at [REDACTED] Saline County, Nebraska [REDACTED] when it caught fire and burned; and that the engine to the Plaintiff's vehicle was not running at the time when the vehicle caught fire.

FIRST CAUSE OF ACTION
(Negligence)

III.

[REDACTED]

That the Defendant Ford Motor Company was negligent in the design of this 2001 Ford Escape SUV and in failing to properly insulate the electrical system and other potential ignition sources from combustible materials in this vehicle's engine.

SECOND CAUSE OF ACTION
(Warranty)

IV.

That the 2001 Ford Escape SUV manufactured by the Defendant Ford Motor Company was defective in that it was improperly designed by failing to properly insulate the electrical system and other ignition sources in the vehicle's engine from combustible materials, and that this defect constitutes a breach of the warranty of merchantability imposed on the Defendant Ford Motor Company; and that this breach of the warranty caused the fire to damage the Plaintiff's vehicle in this instance.

THIRD CAUSE OF ACTION
(Product Liability)

V.

That the 2001 Ford Escape SUV manufactured by the Defendant Ford Motor Company and purchased by the Plaintiff was defective in that the electrical system and other ignition sources were not properly insulated in the engine of the SUV from combustible materials; that this defect was present when Defendant Ford Motor Company placed this vehicle into the stream of commerce and when said vehicle was purchased by that Plaintiff; that the defect described above was the proximate cause of the fire damage to the Plaintiff's vehicle, and that the Defendant is liable to the Plaintiff for this damage under the Doctrine of Product Liability.

VI.

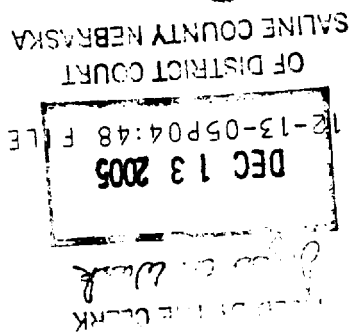


That the Plaintiff sustained damages as a result of this fire in the sum of \$14,185.80; that due demand has been made upon Defendant Ford Motor Company for these damages, but that the Defendant has failed and refused to reimburse the Plaintiff in the amount requested.

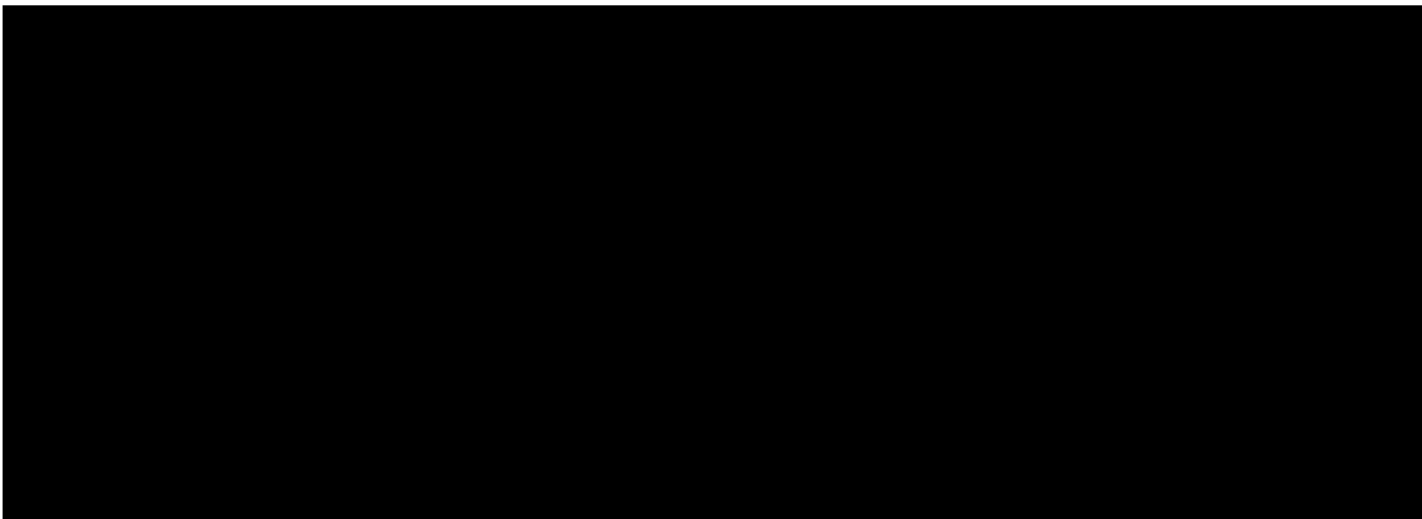
WHEREFORE, Plaintiff [REDACTED] prays for judgment against the Defendant Ford Motor Company on all three of her causes of actions in the sum of \$14,185.80, plus Plaintiff's taxable court costs.

Dated this 15 day of November, 2005.

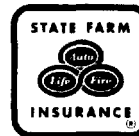
[REDACTED] Plaintiff,



By: Thomas J. Walsh, Jr.
Thomas J. Walsh, Jr. #16479
WALSH LAW, P.C.
Old Orchard West
13304 West Center Road, #222
Omaha, Nebraska 68144
Phone : (402) 697-1161
Attorneys for Plaintiff



State Farm Insurance Companies®

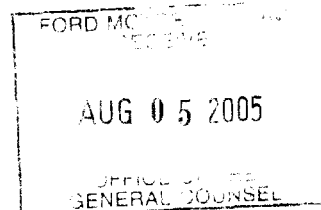


AUG 04 2005

August 2, 2005

Fairfax Operations Center
4401 Village Drive
P.O. Box 10125
Fairfax, VA 22038-8025
703 218 0400 or 800 394 1792

FORD MOTOR COMPANY
PARKLANE TOWERS WEST STE 400
3 PARKLANE BLVD
DEARBORN MI 48126-2568



RE: Claim Number: [REDACTED]
Our Insured: [REDACTED]
Date of Loss: July 24, 2005
Make, Model and Year of Product: 2002 Ford Escape XLT
Vehicle Identification Number: 1FMYU04192K [REDACTED]

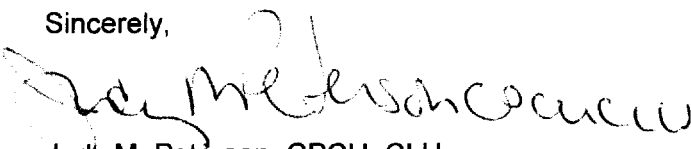
Dear Sir:

The identified vehicle is insured with State Farm Mutual Automobile Insurance Company. This vehicle experienced a fire loss in the engine compartment after being parked for two hours.

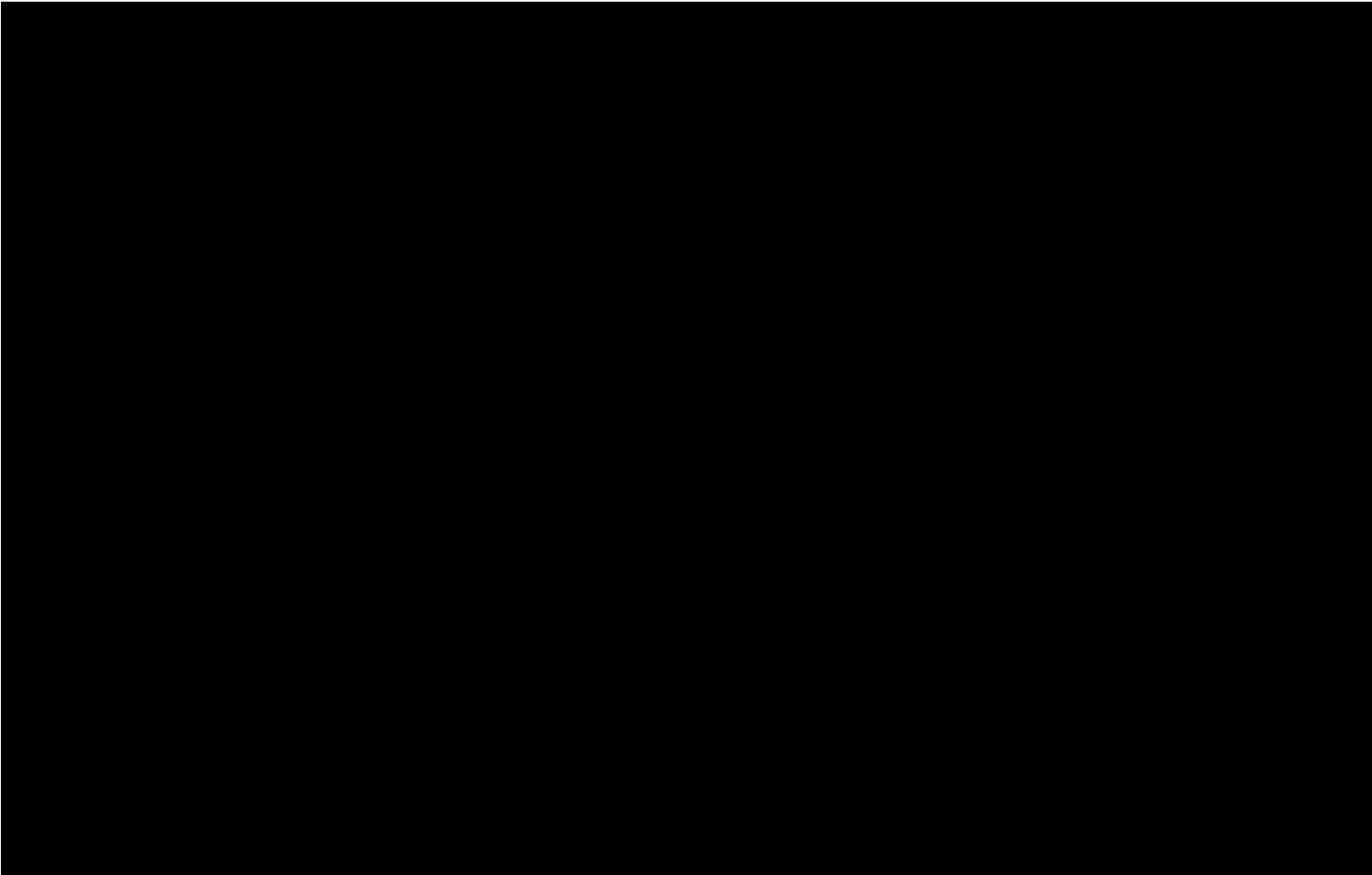
State Farm® would like to give you an opportunity to inspect the vehicle and give you advance notice of our potential subrogation claim.

Please contact me at 703 218 0486 to set up a time for your inspection.

Sincerely,


Judy M. Peterson, CPCU, CLU
Claim Representative
703 218 0486
State Farm Mutual Automobile Insurance Company

21/636/0801036



ISSUE LIST

Last Handling Date/ Issue Status	Name/ Reason Desc	Vin/ Case No.	Model Year and Vehicle Line	Issue Type
8/4/2005 CLOSED	[REDACTED] MISC INQUIRY - CHANGE OF ADDRESS	1FMCU04102K [REDACTED] 334102135	2002 ESCAPE	02
8/4/2005 CLOSED	[REDACTED] CAC RELATED - F/M CSR FOLLOWING CONTACT	1FMCU04102K [REDACTED] 334102135	2002 ESCAPE	02
8/1/2005 CLOSED	[REDACTED] LEGAL - ACCIDENT / FIRE	1FMCU04102K [REDACTED] 334102135	2002 ESCAPE	10

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All Action Details for Issue

[Print](#)

VIN: 1FMCU04102KC [REDACTED]
Name: M [REDACTED]
Symptom Desc:
Reason Desc: MISC INQUIRY - CHANGE OF ADDRESS
Issue Type: 02 INFORMATION
Year: 2002
Owner Status: Original
Issue Status: CLOSED

Model: ESCAPE
WSD: 2002-07-26
Primary Phone: [REDACTED]
Secondary Phone: [REDACTED]
Case: [REDACTED]

Action: UPDATE CUSTOMER ADDRESS OR PHONE NUMBER
Dealer: 01492 KEYSER & MILLER FORD INC
Odometer: 1 MI
Analyst Name: TANEJA JITENDRA
Action Date: 08/04/2005
Comm Type: PHONE
Analyst: JTANEJA
Action Time: 13.52.11.961

Origin Desc: MANUAL - PHONE CSR

Action Data: No

Caller Information If Different From Vehicle Owner:

First Name	Middle Initial	Last Name	Day Phone	Relationship
[REDACTED]		[REDACTED]	[REDACTED]	SPOUSE

Comments CUSTOMER SAID: =WANTS TO MAKE SURE THAT THE ADDRESS IS CORRECT ON THEIR PROFILE=STATES THAT THE LETTER WHICH WAS SENT OUT TO THEM BY FORD WAS NOT SENT AT THE ABOVE MENTIONED ADDRESS AND WANTS FORD TO SEND OUT ANY FORWARD COMMUNICATION TO THEIR ADDRESS ON THIS PROFILE WHICH IS: 1703 CENTRAL AVE OCEAN CITY, NEW JERSEY - 08226
DEALER SAID: =NONE
CRC ADVISED: (NOTE TO CSR - THIS MAC IS TO BE USED FOR UPDATING CUSTOMER INFORMATION ONLY. DO NOT USE FOR DOCUMENTING ANY OTHER ISSUES.)
=ADVISED CUST THAT THE ADDRESS IS THE SAME ON THEIR PROFILE WHICH THEY HAVE MENTIONED AND CONFIRMED THE SAME

Ford Confidential

10/3/2005

PE06-048-0372LC

All Action Details for Issue

[Print](#)

VIN: 1FMCU04102K [REDACTED]
Name: [REDACTED]
Symptom Desc: GENERAL INQUIRIES REQUEST/NON-VEHICLE RELATED
Reason Desc: CAC RELATED - F/M CSR FOLLOWING CONTACT
Issue Type: 02 INFORMATION

Year: 2002
Owner Status: Original
Issue Status: CLOSED

Model: ESCAPE Case: [REDACTED]
WSD: 2002-07-26
Primary Phone: [REDACTED]
Secondary Phone: [REDACTED]

Action: CALLBACK ADD ADDITIONAL COMMENTS

Dealer: 01492 KEYSER & MILLER FORD INC

Origin Desc: US CONCERN CASE BASE

Odometer: 45000 MI

Comm Type: PHONE

Analyst Name: LINCOLN LAZARUS

Analyst: LLINCOL1

Action Date: 08/04/2005

Action Time: 11.30.57.112

Action Data: No

Caller Information If Different From Vehicle Owner:

First Name	Middle Initial	Last Name	Day Phone	Relationship
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	SPOUSE

Comments CUSTOMER SAID: ===AS PER HISTORICALS DATED 8/1/2005===NO ONE CALLED FROM LEGAL DEPT-NEED
UPDEALER SAID: NONECRC ADVISED: PLEASE ALLOW THE REQUESTED TIME FOR THE FOLLOW UP TO OCCUR SO
THAT YOUR ISSUE MAY BE PROPERLY ADDRESSED.

Ford Confidential

10/3/2005

PE06-048-0373LC

All Action Details for Issue

Print

VIN: 1FMCU04102K [REDACTED] Year: 2002
Name: [REDACTED] Owner Status: Original
Symptom Desc: FIRE/SMOKE VISIBLE FLAME UNDERHOOD
Reason Desc: LEGAL - ACCIDENT / FIRE
Issue Type: 10 OGC Issue Status: CLOSED

Model: ESCAPE Case: [REDACTED]
WSD: 2002-07-26
Primary Phone: [REDACTED]
Secondary Phone: [REDACTED]

Action: CONTACT ADVANCED TO OGC
Dealer: 01492 KEYSER & MILLER FORD INC
Odometer: 45000 MI
Analyst Name: MARCELLE JOANNE
Action Date: 08/01/2005

Comm Type: PHONE
Analyst: JMARCEL5
Action Time: 09.16.49.408

Origin Desc: US CONCERN CASE BASE

Action Data: No

Caller Information If Different From Vehicle Owner:

First Name	Middle Initial	Last Name	Day Phone	Relationship
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	SPOUSE

Comments CUSTOMER SAID: =CUST SAYS THE VEH CAUGHT ON FIRD WED 27TH OF JULY AT 4:00PM IN THE AFTERNOON.=CUST SAYS THERE WAS VISIBLE FLAMES, THE FLAMES WAS COMING FROM UNDER THE HOOD.=CUST SAYS THERE WAS ALSO FLAMES COMING FROM UNDER THE WHEEL WELL.=CUST SAYS THE GARAGE WAS ALSO BURNT DUE TO THE FIRE.=CUST SAYS BRAND NEW BIKES WERE ALSO DAMAGED.=CUST SAYS NO ONE WAS HURT, THE FIRE DEPT CAME OUT POLICE AND FIRE REPORT WAS FILED.=CUST SAYS THE INSURANCE CO. WAS NOTIFIED, NHTSA WAS SENT PHOTO OF THE ACCIDENT.=CUST SAYS CUST IS CURRENTLY IN A HOTEL BECAUSE THEY HAVE TO CLEAN UP THE HOME.=CUST SAYS THE VEH OPERATING PERFECTLY, HOWEVER THE CHECK ENGINE WAS ON AND CUST DID CONTACT THE DLRHSIP ON THE MATTER KEYSER & MILLER FORD, AND WAS TOLD IF THE VEH IS RUNING FINE CUST DOSE NOT NEED TO BRING THE VEH IN AT THIS TIME THIS WAS 2 WEEKS PRIOR TO THE FIRE OCCURED.=CUST SAYS THE VEH IS AT AN AUTO REPAIR SHOP IN PA HILTEBIANDTS AUTO BODY SHOP=CUST SAYS WILL LIKE TO KNOW WHAT POSITION ON THIS SITUATION.DEALER SAID: KEYSER & MILLER FORD INC 8 EAST MAIN STREETCOLLEGEVILLE, PA 19426PHONE: (610)489-9366CRC ADVISED: I WILL FORWARD THIS INFORMATION TO THE FORD OGC DEPARTMENT. YOU WILL BE CONTACTED WITHIN 3-5 BUSINESS DAYS.=CSR ADVISED CUST OF THE ABOVE.

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10/3/2005

PE06-048-0374LC



Four Sentry Parkway
Suite 300
Blue Bell, PA 19422
Phone: 610.862.6500
Fax: 610.862.6501

www.nldhlaw.com

Ford Motor Company
Office of the General Counsel
Parklane Towers West, Suite 300
Three Parkland Blvd
Dearborn, MI 48216-2568

September 8, 2005

SEP 12 2005

Reply to:
Michael Kurtis
Direct: 610.862.6539
mkurtis@nldhlaw.com

Re: CAU Insured:
CAU Claim #:
Date of Loss:

7/27/2005

Dear Sir or Madam:

This office has been retained to represent and protect Community Association Underwriters of America, Inc.(CAU) with regard to the fire in the above referenced matter. As you know, a fire was caused by spontaneous ignition of a Ford Escape parked in a unit garage, and it is expected that after CAU makes payment on the claim it will look to any responsible party or parties for recovery of those monies. Preliminary investigation has been conducted, and it appears that you may be found to have been responsible for the property damage arising from this fire.

Under the law, we are obligated to advise you as to these circumstances and provide you with an opportunity to inspect the evidence retained. It is in this connection that I am contacting you, and looking for your insurance company to participate in the investigation process. An inspection will likely take place in the next several days, and you and/or your carrier are invited to attend.

I ask that you place any relevant insurance carrier on notice immediately, so as not to prejudice its ability to investigate this matter on your behalf. In addition, I must require that any communications that you or your carrier undertake(s) with CAU in furtherance of this investigation be done through my office. Thus, I look forward to hearing from you, or someone on your behalf, in the immediate future. In the meantime, thanks for your attention and prompt action.

Very truly yours,

NELSON LEVINE de LUCA & HORST, LLC

Michael J. Kurt
Michael J. Kurtis

MJK/bjp

cc: Cass Gillispie, Community Association Underwriters of America, Inc.

PE06-048-0375LC



State Farm Insurance Companies®



September 2, 2005

Portsmouth Operations Center
8050 Ohio River Road
Wheelersburg, OH 45694
740 574 9500
800 897 5046

FORD MOTOR COMPANY
PARKLANE TOWERS WEST SUITE 400
3 PARKLANE BOULEVARD
DEARBORN MI 48126-2568

SEP 09 2005

SEP 09 2005

OFFICE OF THE
GENERAL COUNSEL

RE: Claim Number: [REDACTED]
Our Insured: [REDACTED]
Date of Loss: August 31, 2005
Make, Model and Year Product: 2001 Ford Escape
Serial Number or Vehicle Identification Number (VIN No.): 1FMYU03141K [REDACTED]

Dear Sir/Madam:

The identified 2001 Ford Escape is insured by State Farm Mutual Automobile Insurance Company. This 2001 Ford Escape experienced an engine compartment fire.

State Farm would like to give you an opportunity to inspect the 2001 Ford Escape and give you advance notice of our potential subrogation claim.

Please contact me at 740 574 2486 to set up a time for your inspection.

Sincerely,

A handwritten signature in cursive script, appearing to read "Eric Royster".

Eric Royster
Claim Representative
State Farm Mutual Automobile Insurance Company

08/901/0901025



Rzesutock Engineering
Forensic Engineering & Evaluations

September 14, 2005

Mr. Eric Royster
State Farm Insurance Companies
8050 Ohio River Road
Wheelersburg, OH 45694

Reference:

File/Claim Number: [REDACTED]
Your Client/Insured: [REDACTED]

Dear Mr. Royster:

Enclosed is the report and photograph supplement for the referenced file. The invoice is also included. If you have any questions regarding any of the enclosed materials, please feel free to call me at (888) 875-3204.

Sincerely,

Michael P. Rzesutock, P.E.

enclosures

RECEIVED

2005

SERVICE CENTER

XXX 13, 2005

Mr. Eric Royster
State Farm Insurance Companies
8050 Ohio River Road
Wheelersburg, OH 45694

Re: Vehicle Fire Origin & Cause
Waverly, OH
Your Insured: [REDACTED]
Your File: [REDACTED]
Rzesutock Engineering Project No.: OH050902

Dear Mr. Royster:

At your request, on September 5, 2005, I traveled to Heistead's Towing, in Waverly, Ohio and examined a 2001 Ford Escape which had burned on August 31, 2005. You requested that I offer an engineering opinion in regard to the origin and cause of the fire.

Reportedly the Escape was being driven immediately prior to the fire. The driver stated that the engine of the Escape was "cutting out" and when she arrived at her niece's residence, she parked the vehicle in the driveway. She stated at that point in time she observed flames coming from the hood of the vehicle. She then called the fire department.

Figures 1 through 9 in the photograph supplement to this report, are general views of the 2001 Ford Escape. The VIN was 1FMYU03141K[REDACTED]; the Ohio license plate was [REDACTED]. The Escape featured a 3.0 liter V-6 engine with fuel injection, an automatic transmission with front wheel drive, power assisted steering, power assisted brakes and air conditioning. In general, the burn damage sustained by the Escape decreased as the distance from the front of the vehicle increased. This burn pattern is visible in Figures 10 through 14 which are views of the interior of the Escape. More unburned debris was located in the rear of the vehicle as opposed to front of the vehicle. No electrical defects were observed in the dashboard. Figure 15 is a view of the gasoline filter neck cap which



Rzesutock Engineering
Forensic Motor Vehicle Engineering

PE CENTER

2166 U.S. Route 50 • Fayetteville, Ohio 45118 • Phone/Fax: 888-875-3204

was located on the driver side of the vehicle. The plastic of the cap was partially burned but intact.

I

Figure 16 is a view of the engine compartment. All combustible materials in the engine compartment had been consumed by the fire. Figure 17 is a view of the engine block with the portion of the fallen hood liner removed. In this photograph it can be seen that the hood liner had protected the fiberglass valve cover and the wire harness associated with the fuel injectors from being completely consumed by the fire.

No defects in the electrical system of the engine compartment were observed. Figure 18 is a view of the battery, located at the driver side front corner of the engine compartment. Figure 19 is a view of the positive battery terminal and Figure 20 is a view of the negative battery cable. The connector with this cable could not be located. The cables connected to the positive battery terminal were traced to the starter and the power distribution box. Although the wires had sustained burn damage, they featured no indications of short circuits or electrical defects which could contribute to the origin of the fire. Figure 21 is a view of the power distribution box. Again, no extremely localized burn patterns or electrical defects were observed at this component.

The burn damage sustained by the engine compartment featured a relatively greater intensity at locations between the engine block and the bulkhead. Subsystems in this area which contained burnable fluids included the fuel system, the brake system and the power steering system. The arrow added to the left side of Figure 22 points out the fuel line connection to the fuel rail. The right arrow points out the approximately location of the fuel line from the tank. The brake fluid reservoir was located directly above the fuel line from the tank. The fuel line was traced rearward to the fuel tank where it was observed that the flexible hose from the fuel tank had sustained complete burn damage. However, in my opinion, the lack of burn damage at the rear of the vehicle indicated that the fire had not originated adjacent to the fuel tank.

The power steering system was located on the passenger side of the engine compartment. Figure 23 shows the high pressure line from the pump and Figure 24 shows one of the connectors at the lower passenger side rear portion of the engine compartment. This connector is shown in a closer view in Figure 25. A burn pattern is visible on the cross member immediately adjacent to the connector. Figure 26 is a view of the burn pattern located on the underside of the Escape at a location to the rear of the passenger side of the engine compartment. The exhaust pipe was located in the center portion of the rear of the engine compartment. In my opinion, based on the burn patterns, the fire had been most intense at a location at the passenger side rear portion of the engine compartment at a location adjacent to the power steering lines.

The reports of the incident indicate that the vehicle was experiencing driveability problems immediately prior to the fire. In my opinion, this indicates that the vehicle was experiencing problems with either the electrical system or with the fuel system. The power distribution portion of the electrical system showed no indications of any defects

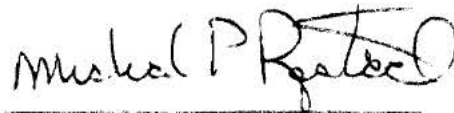
consistent with the origin of the fire. The fuel lines were located toward the rear of the engine compartment. In my opinion, it is possible that a fuel leak had occurred and the leaking fuel had been ignited by the heat of the exhaust pipe. However, the fuel lines were located at the edge of the area of greatest burn damage.

Another fire scenario which, in my opinion, would have been consistent with the reported events was a leak of power steering fluid from the high pressure line. A leak of this line located adjacent to the exhaust pipe would be capable of causing a fire. The computer wire harness was located adjacent to the power steering conduit (see Figure 27) and would have been involved in the earliest stages of the fire. Consequently, the computer would have been subjected to the effects of the fire in the earliest stages of the fire. This would have likely produced driveability problems. Thus, a leak of power steering fluid ignited by the exhaust pipe would be consistent with the reports of the fire. Based on the location of the power steering line in the area of greatest burn damage and the difficulty of igniting gasoline on a hot surface, it is my opinion that the most likely cause of the fire was a leak of power steering fluid which was ignited by the heat of the exhaust pipe.

son the foregoing observations and analysis, the following are my opinions, to a reasonable degree of engineering certainty, regarding the origin and cause of the fire in the 2001 Ford Escape. First, the fire originated at the passenger side rear portion of the engine compartment between the engine block and the bulk head. Second, the cause of the fire was most likely a leak of power steering fluid which was ignited by the hot exhaust pipe. The wire harness associated with the computer was involved in the earliest stages of the fire and likely produced the reported driveability problems.

At your request, this report is being sent to summarize my findings. If you should have any questions, please feel free to contact me. I appreciate the opportunity to have been of service to you.

Sincerely,



Michael P. Rzesutock
Professional Engineer
State of Ohio
Registration E-51954

enclosures

Project [REDACTED]
Page 3

PORTSMOUTH SERVICE CENTER

Photograph Supplement
For
Vehicle Fire Origin & Cause
Waverly, OH

Prepared for:
Mr. Eric Royster
State Farm Insurance Companies
8050 Ohio River Road
Wheelersburg, OH 45694
Client: [REDACTED]
File No. : [REDACTED]

Prepared by:
Michael P. Rzesutock, PE
Project: OH050902
Date: September 14, 2005

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10/1

TH SERV



Rzesutock Engineering
Forensic Motor Vehicle Engineering

2166 U.S. Route 50 • Fayetteville, Ohio 45118 • Phone/Fax: 888-875-3204



Figure 1, Front View of Ford Escape



Figure 2, Passenger Side Front View of Ford Escape



Figure 3. Passenger Side View of Ford Escape



Figure 4. Passenger Side Rear View of Ford Escape

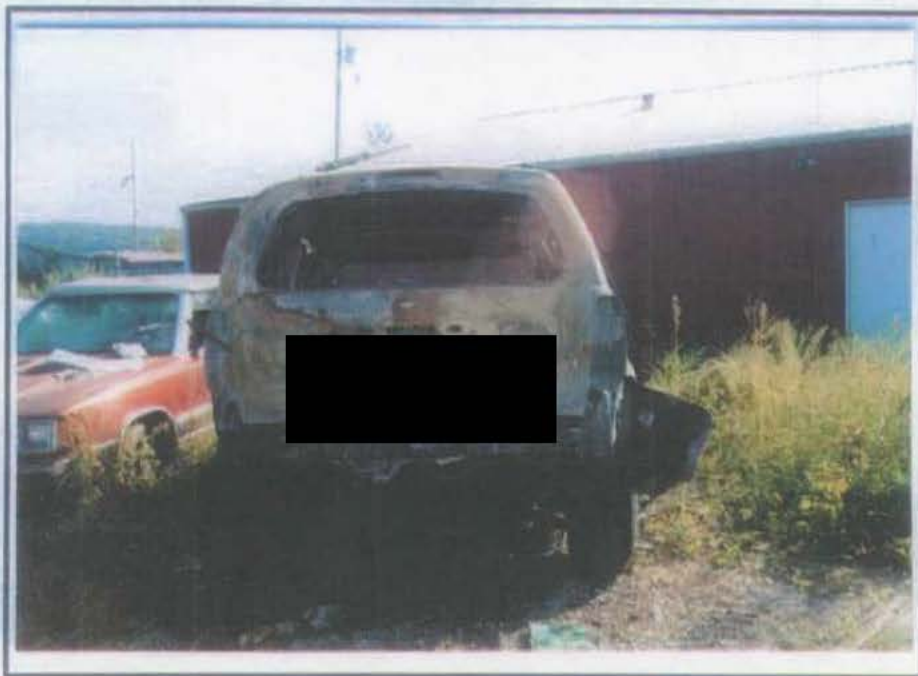


Figure 5. Rear View of Ford Escape



Figure 6. Driver Side Rear View of Ford Escape



Figure 7. View of Rear Portions of Driver Side of Ford Escape



Figure 8. View of Front Portions of Driver Side of Ford Escape



Figure 9. Driver Side Front View of Ford Escape



Figure 10. Passenger Side View of Dashboard



Figure 11. Driver Side View of Dashboard



Figure 12. Driver Side View of Rear Seat



Figure 13. Passenger Side View of Rear Seat



Figure 14. Passenger Side View of Cargo Area



Figure 15. View of Melted Fuel Filler Neck Cap



Figure 16. View of Engine Compartment

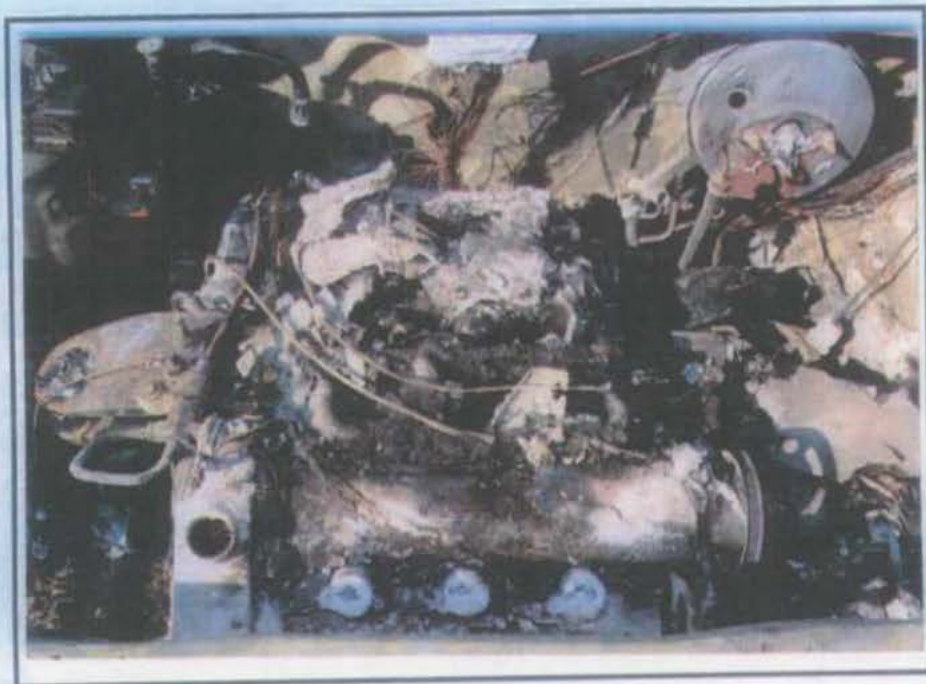


Figure 17. View of Engine after Removal of Hood Liner



Figure 18. View of Battery



Figure 19. View of Positive Battery Connector



Figure 20. View of Negative Battery Wire



Figure 21. View of Power Distribution Box



Figure 22. View of Location of Fuel Lines



Figure 23, View of High Pressure Power Steering Line



Figure 24, View of Power Steering Connector



Figure 25. View of Power Steering Connector and Burn Pattern



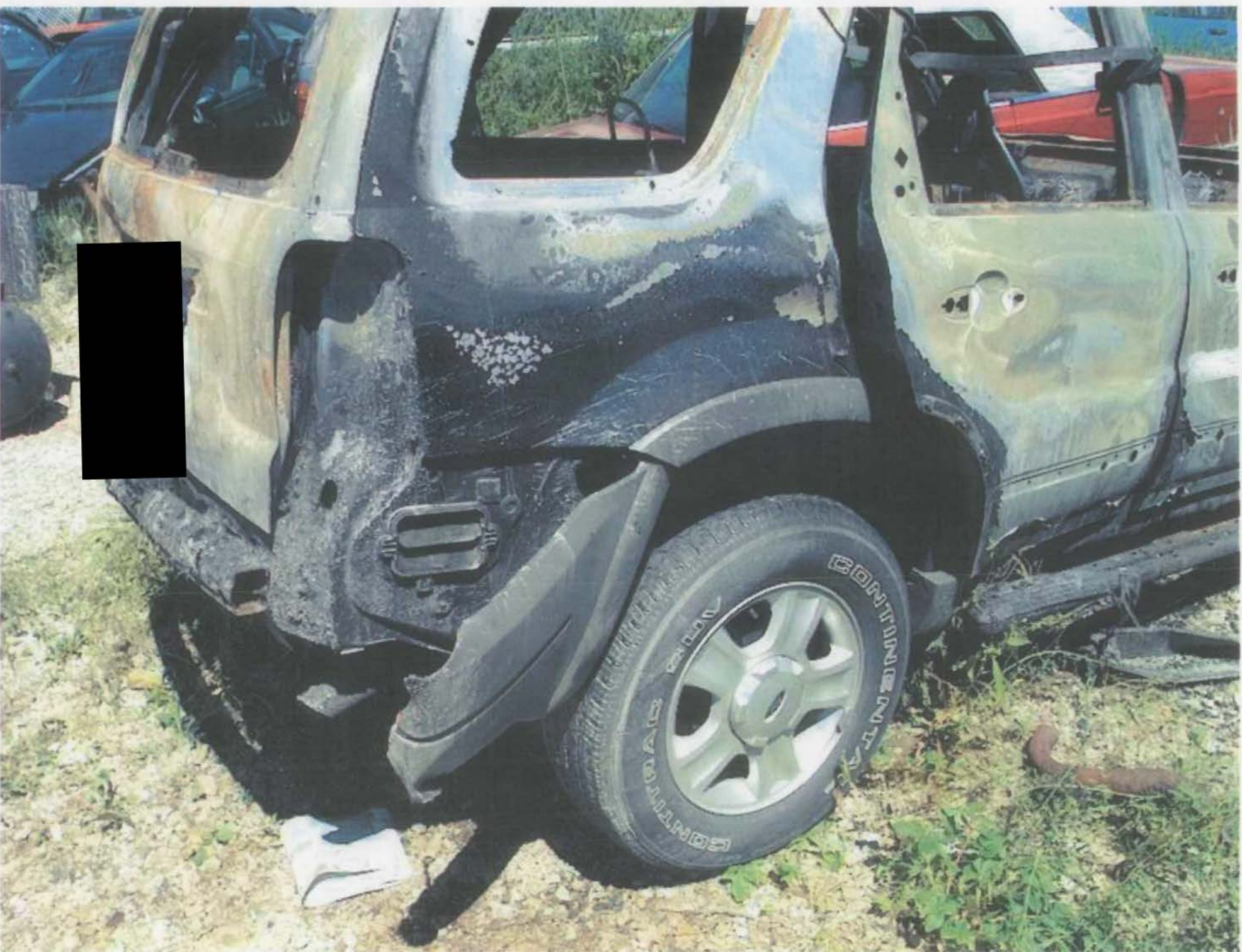
Figure 26. View of Burn Pattern on Under Side of the Vehicle



Figure 27. View of Wire Harness to Computer











BENTON TOWNSHIP VOLUNTEER FIRE DEPARTMENT

Run No. _____ Mo. 8 Day 30 Year 05 Alert 9:50 Arrival 10:11 In Service 11:53

Address of Run _____ City Peebles Zip Code _____

INCIDENT TYPE: Vehicle Fire MUTUAL AID NONE

ACTION TAKEN: ☒ Extinguishment ☐ Rescue ☐ Investigate ☐ Stand By ☐ Salvage
☐ Unclassified ☐ Fill In ☐ Cancelled Enroute ☐ Search ☐ Extricate
☐ Remove Hazzard ☐ Provide Air Supply ☐ Manpower ☐ Equipment

VEHICLES: 801 806 ☒ 811 812 ☒ 800 Rescue FIRE PERSONNEL RESPONDED 4

INJURIES: Fire Personnel 0 Civilian 0 DEATHS: Fire Personnel 0 Civilian 0

PROPERTY LOSS: TOTAL CONTENTS LOSS _____

SMOKE DETECTOR: MA WORKED ☐ DID NOT WORK ☐ UNKNOWN ☐

PROPERTY USE: Occured on Roadway

OCCUPANT OWNER ADDRESS _____

CITY _____ ZIP CODE _____ PHONE # _____

OWNER _____ ADDRESS _____

CITY Pikeston ZIP CODE _____ PHONE # _____

AREA OF ORIGIN Under the hood ITEM FIRST IGNITED Unknown

HEAT SOURCE Unknown TYPE OF MATERIAL IGNITED Unknown

CAUSE OF IGNITION Unknown

EQUIPMENT INVOLVED ☒ YES ☐ NO MOBILE PROPERTY INVOLVED ☒ YES ☐ NO

NUMBER OF STORIES MA STRUCTURE TYPE MA

DWELLING SIZE MA FIRE SPREAD ☐ YES ☐ NO

IF EQUIPMENT INVOLVED: TYPE Ford MODEL Escape YEAR 2001

SERIAL NUMBER _____

MEMBER MAKING REPORT Brian Beckman DATE 8-31-05

OFFICER IN CHARGE Brian Beckman DATE 8-31-05

REMARKS _____

ALMIS TRACTIVE		Pike County Sheriff's Office		CALL NUMBER			
090000				INCIDENT NUMBER			
W				CLEARANCE			
TOB 09:50				CLOSED			
TOA 10:12				CLEARANCE DATE			
TOC 11:15				8/31/2005			
				CLEARED BY			
				66			
INCIDENT		OHIO UNIFORM INCIDENT REPORT					
REPORT DATE/TIME		INCIDENT OCCURRED FROM		INCIDENT OCCURRED TO			
MONTH	DAY	YEAR	TIME	MONTH	DAY	YEAR	TIME
08	31	2005	09:50	08	31	2005	09:47
08	31	2005	10:30				
INCIDENT LOCATION (Street, Apt., City, State, Zip)							
Peabody, OH							
OFFENSE							
OFFENSE CODE							
A/C							
F/M/DEGREE							
HATE/BIAS							
LARCENY							
TYPE CRIMINAL ACT							
LOCATION OF OFFENSE (ENTER UP TO TWO)							
1. 2.							
RESIDENTIAL STRUCTURE							
31 DOCTOR'S OFFICE							
32 OTHER BUSINESS OFFICE							
33 AMUSEMENT CENTER							
34 RENTAL STORAGE FACILITY							
35 OTHER COMMERCIAL SERVICE LOC.							
PUBLIC ACCESS BUILDINGS							
36 BAR							
37 BUY/SELL/TRADE SHOP							
38 RESTAURANT							
39 GAS STATION							
40 AUTO SALES LOT							
41 JEWELLERY STORE							
42 CLOTHING STORE							
43 DRUGSTORE							
44 LIQUOR STORE							
45 SHOPPING MALL							
46 SPORTING GOODS							
47 GROCERY/FOOD MARKET							
48 VARIETY/CONVENIENCE							
49 DEPARTMENT STORE							
50 OTHER RETAIL STORE							
51 FACTORY/WAREHOUSE							
52 OTHER BUILDING							
OUTSIDE							
42 YARD							
43 CONSTRUCTION SITE							
44 LAKE/WATERWAY							
45 FIELDS/WOODS							
46 STREET							
47 PARKING LOT							
48 PARK/PLAYGROUND							
49 CEMETARY							
50 PUBLIC TRANSIT VEHICLE							
51 OTHER OUTSIDE LOCATIONS							
52 OTHER							
SUSPECTED OF USING							
B - BUYING/RECEIVING							
C - CULTIVATING/PLANTING							
D - DISTRIBUTING/SELLING							
E - EXPLOITING CHILDREN							
F - OPERATING/ASSISTING							
G - POSSESSING/CONCEALING							
H - TRANSPORTING/RECEIVING							
I - USING/CONSUMING							
METHOD OF ENTRY							
METHOD OF ENTRY - MOTOR VEHICLE THEFT							
METHOD OF ENTRY - BURGLARY/SM&L							
ENTRY EXIT ENTRY EXIT ENTRY EXIT							
1 BAREMENT							
2 1ST FLOOR							
3 2ND FLOOR							
4 OTHER							
1 DOOR							
2 WINDOW							
3 GARAGE							
4 SKYLIGHT							
5 OTHER							
1 FRONT							
2 SIDE							
3 REAR							
4 ROOF							
5 OTHER							
METHOD OF OPERATION							
NO. TOTAL VICTIMS VICTIM TYPE							
NAME							
ADDRESS							
EMPLOYER NAME & ADDRESS							
PHONE							
PHONE							
AGE/DOB SEX RACE HEIGHT WEIGHT HAIR EYES							
OCCUPATION RESIDENTIAL STATUS							
VICTIM INJURED 1 IF INJURED, DESCRIBE INJURIES							
AGG. ABUSE/THREATS VICTIM-SUSPECT RELATIONSHIP VICTIM-OFFENSE LINK							
REPORTING OFFICER							
APPROVING OFFICER							
BADGE NO. DATE							
BADGE NO. DATE							
FOLLOW UP IF YES, FOLLOW-UP ASSIGNMENT							
N							
ADDITIONAL SUPPLEMENTS 0							
FORM RECD BY RECORDS							
SPECIAL COPIES							

Pike County Sheriff's Office

INCIDENT REPORT - PART 1

R E P O R T E E	NO	NAME (Last, First, Middle)		AGE / DOB		SSN													
	ADDRESS (Street, Apt., City, State, Zip)						PHONE												
	EMPLOYER NAME AND ADDRESS (Street, Apt., City, State, Zip)						PHONE												
	STATUS/TYPE OF INCIDENT		TYPE																
V E H I C L E	CHECK SATISFIED																		
	VICTIM'S VEH.																		
	NO.	LIC	OH	LY	UT	WAGON	VALUE												
	1				PC		0												
	VIN	VMA	VMO	VST	VCC/TOP BOTTOM	LOCKED	KEYS IN VEH	HOLD VEH	RELEASE CONTENTS										
	2001	Ford	Escape	4door	BLACK, BLACK														
	VEHICLE MAKE/ MODEL		VEHICLE MAKE/ MODEL		VEHICLE TOWED		TOWED BY		OWNERSHIP VERIFIED BY										
	WMACTM NO		WMACTM NO		YES		Heisted		TAG RECEIPT										
	STOLEN MOTOR VEHICLE ONLY		NO. STOLEN		AREA STOLEN		ADDITIONAL DESCRIPTION												
	AUTO INSURER NAME (Company) ADDRESS (Street, City, State, Zip)							PHONE											
Ford a/c, Waverly, OH, 45690																			
MOTOR/VEHICLE RECOVERY ONLY		NO. RECOVERED		STOLEN IN YOUR JURISDICTION		WHERE RECOVERED													
P R O P E R T Y	TYPE PROPERTY		1 NONE		3 COUNTERFEITED/FORGED		5 STOLEN/VEH		7 RECOVERED		P PHOTO		TOTAL VALUE						
	LOBBETO		2 BURNED		4 DESTROYED/DAMAGED/VANDALIZED		6 SEIZED		U UNKNOWN		8 EVIDENCE		\$0.00						
	LOSS CODE		QUANTITY		DESCRIPTION		PROP CODE		VALUE		RECOVERED DATE		RECOVERED VALUE						
	VICTIM NO		VEHICLE NO		MAKE/BRAND		MODEL		SERIAL NUMBER		NCIC NUMBER		OTHER NUMBER						
	LOSS CODE		QUANTITY		DESCRIPTION		PROP CODE		VALUE		RECOVERED DATE		RECOVERED VALUE						
	VICTIM NO		VEHICLE NO		MAKE/BRAND		MODEL		SERIAL NUMBER		NCIC NUMBER		OTHER NUMBER						
	LOSS CODE		QUANTITY		DESCRIPTION		PROP CODE		VALUE		RECOVERED DATE		RECOVERED VALUE						
	VICTIM NO		VEHICLE NO		MAKE/BRAND		MODEL		SERIAL NUMBER		NCIC NUMBER		OTHER NUMBER						
	LOSS CODE		QUANTITY		DESCRIPTION		PROP CODE		VALUE		RECOVERED DATE		RECOVERED VALUE						
	VICTIM NO		VEHICLE NO		MAKE/BRAND		MODEL		SERIAL NUMBER		NCIC NUMBER		OTHER NUMBER						
	LOSS CODE		QUANTITY		DESCRIPTION		PROP CODE		VALUE		RECOVERED DATE		RECOVERED VALUE						
	VICTIM NO		VEHICLE NO		MAKE/BRAND		MODEL		SERIAL NUMBER		NCIC NUMBER		OTHER NUMBER						
	LOSS CODE		QUANTITY		DESCRIPTION		PROP CODE		VALUE		RECOVERED DATE		RECOVERED VALUE						
	VICTIM NO		VEHICLE NO		MAKE/BRAND		MODEL		SERIAL NUMBER		NCIC NUMBER		OTHER NUMBER						
	LOSS CODE		QUANTITY		DESCRIPTION		PROP CODE		VALUE		RECOVERED DATE		RECOVERED VALUE						
	VICTIM NO		VEHICLE NO		MAKE/BRAND		MODEL		SERIAL NUMBER		NCIC NUMBER		OTHER NUMBER						
	PROPERTY CODES:																		
	EXCHANGE MEDIUM				PERSONAL EFFECTS				23 PHOTOGRAPHIC EQUIP.				34 HOUSEHOLD PETS				STRUCTURES		
01 MONEY				11 CLOTHING/FURS				24 FARM EQUIPMENT				VEHICLES				46 SINGLE OCCUPANCY			
02 CREDIT/DEBIT CARD				12 PURSES/BAGS/WALLETS				25 HEAVY CONSTRUCTION/INDUSTRIAL				35 AIRCRAFT				47 OTHER DWELLING			
03 NEGOTIABLE INSTRUMENTS				13 OTHER PERSONAL EFFECTS				26 BUILDING SUPPLIES - CONST				36 AUTOMOBILES				48 COMMERCIAL/BUSINESS			
04 OTHER EXCHANGE MEDIUM				HOUSEHOLD EFFECTS				27 TOOLS				37 BICYCLES				49 HOUSES			
DOCUMENTS				EQUIPMENT				28 VEHICLE PARTS/ACCESS.				38 BUSES				50 PUBLIC/COMM.			
05 NON NEGOTIABLE INSTRUMENTS				14 HOUSEHOLD ITEMS				29 SCHOOL SUPPLIES				39 TRUCKS				51 STORAGE			
06 PERSONAL PAPERS				15 DRUGS/PHARMACEUTICALS				30 OTHER EQUIPMENT				40 TRAILERS				52 OTHER STRUCTURE			
07 OTHER DOCUMENTS				16 GAMING EQUIPMENT				31 CONSUMABLE ITEMS				41 WATERCRAFT				OTHER			
VALUABLES				17 COMPUTER HARDWARE/SOFTW.				32 ALCOHOL				42 RECREATIONAL VEH.				53 MERCHANDISE			
08 JEWELLERY/PRECIOUS METALS				18 OFFICE EQUIPMENT				33 DRUGS/PHARMACEUTICALS				43 OTHER MOTOR VEH.				54 OTHER PROPERTY			
09 ART OBJECTS, ANTIQUES				19 STEREO TV EQUIPMENT				34 CONSUMABLE GOODS				44 WEAPONS				55 FISHING INVENTORY			
10 OTHER VALUABLES				20 RECORDING - AUDIO VIS.				35 ANIMALS				45 OTHER WEAPONS							
				21 SPORTS EQUIPMENT				36 LIVESTOCK											
N A R R A T I V E	This deputy was dispatched to 3260 Grassey fork rd, On a vehicle fire with no entrapments. The vehicle was engulfed in flames on arrival. 800 fire department was on scene taking putting out the fire. The victim was standing away from the vehicle.																		
	The victim said the vehicle was missing when she pulled into the drive way and their was smoke coming from under the hood. She tried to put out the fire but was unable.																		
	800 F.D. Put out the fire and left scene, victim was waiting on wrecker as this deputy left.																		

PIKE COUNTY SHERIFF'S OFFICE - LARRY D. TRAVIS, SHERIFF
VOLUNTARY STATEMENT
(NOT UNDER ARREST)

Page No. ____ Of ____ Pages

Report No. ____

Name _____, SSN. _____, DOB. _____
Address _____ Piketon Ohio
Phone _____ Date 8-31-05 Time 11:18 A.M

I have been advised that I am not under arrest for, nor am I being detained for any criminal offenses concerning the events I am about to make known to DEPUTY JACK WHITE

Without being accused of or questioned about any criminal offenses regarding the facts I am about to state. I volunteer the following information of my own free will, for whatever purposes it may serve.

Was coming up _____ to my niece's
house. The vehicle was cutting out and
when I pulled in the driveway I saw
_____ smoke. I pulled the hood release
and then I saw fire. I jumped out of
the vehicle and ran in the house and
called 911.

I have read this statement consisting of _____ page (s) each page of which bears my signature, and corrections. If any bear my initials, and I certify that the facts contained herein are true and correct.

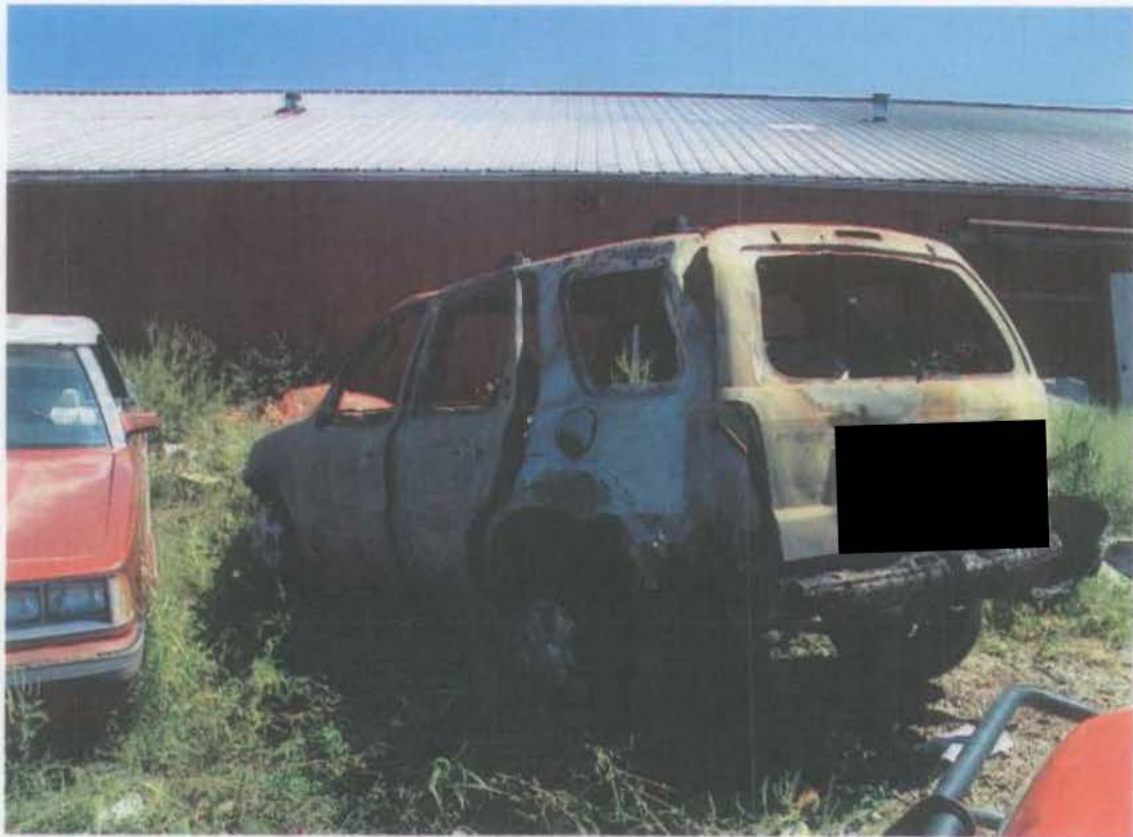
Witness _____ Witness _____

Signature of person Giving Voluntary Statement _____



PE06-048-040

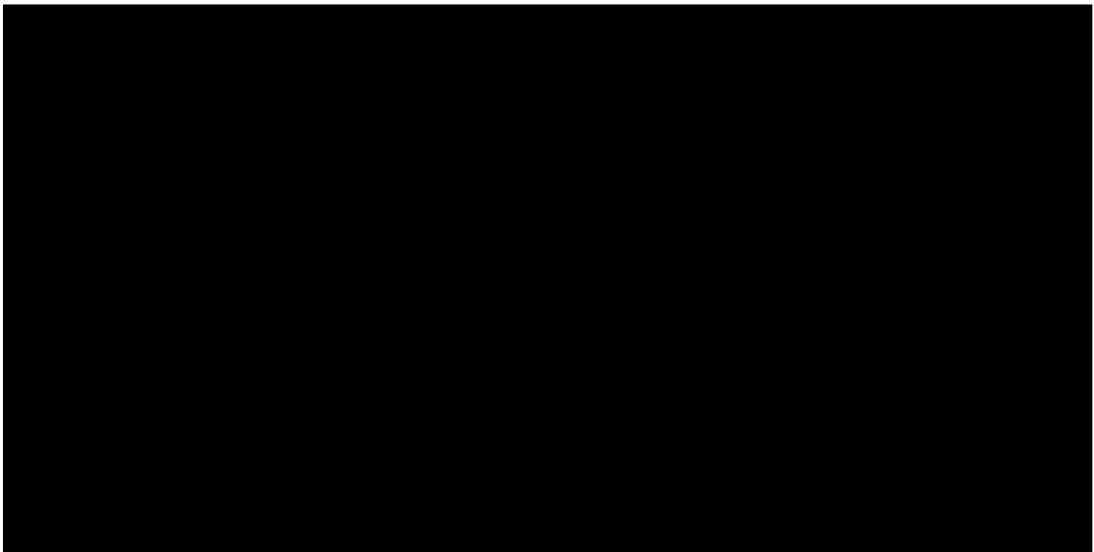












ISSUE LIST

Last Handling Date/ Issue Status	Name/ Reason Desc	Vin/ Case No.	Model Year and Vehicle Line	Issue Type
3/30/2006		1FMCU04102K	2002 ESCAPE	07
CANCEL	OGC - PROPERTY DAMAGE	334102135		
3/24/2006		1FMCU04102K	2002 ESCAPE	10
CLOSED	LEGAL - ACCIDENT / FIRE	334102135		
3/23/2006		1FMCU04102K	2002 ESCAPE	01
CLOSED	CALLBACK ESCALATION - 2ND+ - LEGAL	334102135		
8/4/2005		1FMCU04102K	2002 ESCAPE	02
CLOSED	MISC INQUIRY - CHANGE OF ADDRESS	334102135		
8/4/2005		1FMCU04102K	2002 ESCAPE	02
CLOSED	CRC RELATED - F/M CSR FOLLOWING CONTACT	334102135		

Ford Confidential

All Action Details for Issue

Print

VIN: 1FMCU041021 [REDACTED] Year: 2002
Name: [REDACTED] Owner Status: Original
Symptom Desc: HRN/SPD CNTRL SPEED CONTROL
Reason Desc: OGC - PROPERTY DAMAGE
Issue Type: 07 LEGAL Issue Status: CANCEL

Model: ESCAPE Case: [REDACTED]
WSD: 2002-07-26
Primary Phone: [REDACTED]
Secondary Phone: [REDACTED]

Action: FIELD - OPEN INFORMATION ISSUE

Dealer: 01492 KEYSER & MILLER FORD INC

Origin Desc: FIELD ORGANIZATION

Odometer: 45000 MI

Comm Type: EMAIL

Analyst Name: CARLSON DAN

Analyst: DCARLSO2

Action Date: 03/24/2006

Action Time: 15.49.47.239

Action Data: No

Comments ATTEMPTING TO REOPEN CASE FOR LEGAL SINCE CONTACT NOT SHOWING UP IN CUDLDATE:
8/1/2005 TIME: 09:16:49 AM COMMUNICATION: PHONE ANALYST: [REDACTED] CUSTOMER SAID: =CUST SAYS THE
VEH CAUGHT ON FIRE WED 27TH OF JULY AT 4:00PM IN THE AFTERNOON.=CUST SAYS THERE WAS VISIBLE
FLAMES, THE FLAMES WAS COMING FROM UNDER THE HOOD.=CUST SAYS THERE WAS ALSO FLAMES COMING
FROM UNDER THE WHEEL WELL.=CUST SAYS THE GARAGE WAS ALSO BURNT DUE TO THE FIRE.=CUST SAYS
BRAND NEW BIKES WERE ALSO DAMAGED.=CUST SAYS NO ONE WAS HURT, THE FIRE DEPT CAME OUT POLICE
AND FIRE REPORT WAS FILED.=CUST SAYS THE INSURANCE CO. WAS NOTIFIED, NHTSA WAS SENT PHOTO OF
THE ACCIDENT.=CUST SAYS CUST IS CURRENTLY IN A HOTEL BECAUSE THEY HAVE TO CLEAN UP THE
HOME.=CUST SAYS THE VEH OPERATING PERFECTLY, HOWEVER THE CHECK ENGINE WAS ON AND CUST DID
CONTACT THE DLRSIP ON THE MATTER KEYSER & MILLER FORD, AND WAS TOLD IF THE VEH IS RUNNING FINE
CUST DOES NOT NEED TO BRING THE VEH IN AT THIS TIME THIS WAS 2 WEEKS PRIOR TO THE FIRE
OCCURED.=CUST SAYS THE VEH IS AT AN AUTO REPAIR SHOP IN PA HILTEBIANDTS AUTO BODY SHOP=CUST
SAYS WILL LIKE TO KNOW WHAT POSITION ON THIS SITUATION.DEALER SAID: KEYSER & MILLER FORD INC 8
EAST MAIN STREET COLLEGEVILLE, PA 19426 PHONE: (610)489-9366 CRC ADVISED: I WILL FORWARD THIS
INFORMATION TO THE FORD OGC DEPARTMENT. YOU WILL BE CONTACTED WITHIN 3-5 BUSINESS DAYS.=CSR
ADVISED CUST OF THE ABOVE. THESE APPEAR TO BE THE "HISTORICALS" MENTIONED IN THE
DOCUMENTATION OF 08/04/05. AS YOU CAN SEE FROM THE COMMUNICATION TYPE, THIS WAS A TELEPHONE
CALL RECEIVED FROM THE CUSTOMER, NOT AN EMAIL.

Action: CANCEL ISSUE

Dealer: 01492 KEYSER & MILLER FORD INC

Origin Desc: CONSUMER AFFAIRS - LITIGATION
PREVENTION-FD

Odometer: 45000 MI

Comm Type: PHONE

Analyst Name: LEICH
CHERIE

Analyst: CLEICH

Action Date: 03/30/2006

Action Time:
11.54.17.580

Action Data: No

Comments PER PEGGY BOWERS, CANCEL ISSUE. OGC WILL HANDLE.

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All Action Details for Issue

[Print](#)

VIN: 1FMCU04102K [REDACTED] Year: 2002
 Name: [REDACTED] Owner Status: Original
 Symptom Desc: FIRE/SMOKE VISIBLE FLAME UNDERHOOD
 Reason Desc: LEGAL - ACCIDENT / FIRE
 Issue Type: 10 OGC Issue Status: CLOSED

Model: ESCAPE Case: [REDACTED]
 WSD: 2002-07-26
 Primary Phone: [REDACTED]
 Secondary Phone: [REDACTED]

Action: CONTACT ADVANCED TO OGC

Dealer: 01492 KEYSER & MILLER FORD INC

Origin Desc: US CONCERN CASE BASE

Odometer: 45000 MI

Comm Type: PHONE

Analyst Name: MARCELLE JOANNE

Analyst: JMARCEL5

Action Date: 08/01/2005

Action Time: 09.16.49.408

Action Data: No

Caller Information If Different From Vehicle Owner:

First Name	Middle Initial	Last Name	Day Phone	Relationship
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	SPOUSE

Comments CUSTOMER SAID: =CUST SAYS THE VEH CAUGHT ON FIRE WED 27TH OF JULY AT 4:00PM IN THE AFTERNOON.=CUST SAYS THERE WAS VISIBLE FLAMES, THE FLAMES WAS COMING FROM UNDER THE HOOD.=CUST SAYS THERE WAS ALSO FLAMES COMING FROM UNDER THE WHEEL WELL.=CUST SAYS THE GARAGE WAS ALSO BURNT DUE TO THE FIRE.=CUST SAYS BRAND NEW BIKES WERE ALSO DAMAGED.=CUST SAYS NO ONE WAS HURT, THE FIRE DEPT CAME OUT POLICE AND FIRE REPORT WAS FILED.=CUST SAYS THE INSURANCE CO. WAS NOTIFIED, NHTSA WAS SENT PHOTO OF THE ACCIDENT.=CUST SAYS CUST IS CURRENTLY IN A HOTEL BECAUSE THEY HAVE TO CLEAN UP THE HOME.=CUST SAYS THE VEH OPERATING PERFECTLY, HOWEVER THE CHECK ENGINE WAS ON AND CUST DID CONTACT THE DLRHSIP ON THE MATTER KEYSER & MILLER FORD, AND WAS TOLD IF THE VEH IS RUNNING FINE CUST DOES NOT NEED TO BRING THE VEH IN AT THIS TIME THIS WAS 2 WEEKS PRIOR TO THE FIRE OCCURED.=CUST SAYS THE VEH IS AT AN AUTO REPAIR SHOP IN PA HILTEBIANDTS AUTO BODY SHOP=CUST SAYS WILL LIKE TO KNOW WHAT POSITION ON THIS SITUATION.DEALER SAID: KEYSER & MILLER FORD INC 8 EAST MAIN STREET COLLEGEVILLE, PA 19426PHONE: (610)489-9366CRC ADVISED: I WILL FORWARD THIS INFORMATION TO THE FORD OGC DEPARTMENT. YOU WILL BE CONTACTED WITHIN 3-5 BUSINESS DAYS.=CSR ADVISED CUST OF THE ABOVE.

Action: CONTACT ADVANCED TO OGC

Dealer: 01492 KEYSER & MILLER FORD INC

Origin Desc: US CONCERN CASE BASE

Odometer: 45000 MI

Comm Type: PHONE

Analyst Name: RAMIREZ (GRAMIR29),GINA

Analyst: GRAMIR29

Action Date: 03/24/2006

Action Time: 11.42.57.899 Action Data: No

Comments CUSTOMER SAID: - CL (GRAMIR29) REDOCUMENTING ISSUE PER CLIENT (DCARLSO2) REQUEST- HISTORICAL DOCUMENTATION ENTERED BY JMARCEL5 ON 08/01/05 FOLLOWS -----=CUST SAYS THE VEH CAUGHT ON FIRE WED 27TH OF JULY AT 4:00PM IN THE AFTERNOON.=CUST SAYS THERE WAS VISIBLE FLAMES, THE FLAMES WAS COMING FROM UNDER THE HOOD.=CUST SAYS THERE WAS ALSO FLAMES COMING FROM UNDER THE WHEEL WELL.=CUST SAYS THE GARAGE WAS ALSO BURNT DUE TO THE FIRE.=CUST SAYS BRAND NEW BIKES WERE ALSO DAMAGED.=CUST SAYS NO ONE WAS HURT, THE FIRE DEPT CAME OUT POLICE AND FIRE REPORT WAS FILED.=CUST SAYS THE INSURANCE CO. WAS NOTIFIED, NHTSA WAS SENT PHOTO OF THE ACCIDENT.=CUST SAYS CUST IS CURRENTLY IN A HOTEL BECAUSE THEY HAVE TO CLEAN UP THE HOME.=CUST SAYS THE VEH OPERATING PERFECTLY, HOWEVER THE CHECK ENGINE WAS ON AND CUST DID CONTACT THE DLRHSIP ON THE MATTER KEYSER & MILLER FORD, AND WAS TOLD IF THE VEH IS RUNNING FINE CUST DOES NOT NEED TO BRING THE VEH IN AT THIS TIME THIS WAS 2 WEEKS PRIOR TO THE FIRE OCCURED.=CUST SAYS THE VEH IS AT AN AUTO REPAIR SHOP IN PA HILTEBIANDTS AUTO BODY SHOP=CUST SAYS WILL LIKE TO KNOW WHAT POSITION ON THIS SITUATION.DEALER SAID: KEYSER & MILLER FORD INC 8 EAST MAIN STREET COLLEGEVILLE, PA 19426PHONE: (610)489-9366CRC ADVISED: I WILL FORWARD THIS INFORMATION TO THE FORD OFFICE OF GENERAL COUNSEL DEPARTMENT. YOU WILL RECEIVE WRITTEN

NOTIFICATION WITHIN 10-15 BUSINESS DAYS, WHICH YOU WILL NEED TO RESPOND TO IN WRITING

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All Action Details for Issue

Print

VIN: 1FMCU04102K [REDACTED] Year: 2002 Model: ESCAPE Case: 3 [REDACTED]
Name: [REDACTED] Owner Status: Original WSD: 2002-07-26
Symptom Desc: Primary Phone: [REDACTED]
Reason Desc: CALLBACK ESCALATION - 2ND+ - LEGAL Secondary Phone: [REDACTED]
Issue Type: 01 INQUIRY Issue Status: CLOSED

Action: 2ND - CALLBACK ESCALATION TO TEAM LEADER

Dealer:

Origin Desc: US CONCERN CASE BASE

Odometer: 2000 MI

Comm Type: PHONE

Analyst Name: LAU IRENE

Analyst: ILAU2

Action Date: 03/23/2006

Action Time: 17.14.05.739

Action Data: No

Comments CUSTOMER SAID: -SAYS THAT SHE E-MAILED US ABOUT THE FIRE THAT HAD CAUSED APPROX \$9000 WORTH DAMAGE HE CLAIM HAD BEEN PAID BY THE INSURANCE COMPANY BUT CUST IS ASKING FORD TO COVER THE REST OF HER EXPENSES. IE HOTEL. ETC. CUST HAD SOME DAMAGE TO PROPERTY (AS PER HISTORICALS) -CURRENTLY WAITING FOR FORD LEGAL DEPT TO CONTACT HER ABOUT HER CLAIM, SAYS THAT SMOKE PROBLEM WAS DUE TO ELECTRICAL PROBLEM WITH VEHICLE AND THAT IT WAS NOT DUE TO ANYTHING SHE DID (ALLEGING FORD IS RESPONSIBLE) . -NO ONE HAS GOTTEN BACK TO HER YET ABOUT HER CLAIM AND IS CALLING BACK.DEALER SAID: KEYSER & MILLER FORD INC8 EAST MAIN STREET COLLEGEVILLE, PA 19426TEL: (610) 489-9366CRC ADVISED: I APOLOGIZE THAT WE HAVE NOT MET YOUR EXPECTATION. PLEASE HOLD WHILE I ESCALATE YOU TO MY MANAGER. -PLEASE ALLOW 3 TO 5 BUSINESS DAYS FOR A MGR TO FOLLOW UP WITH YOU.

Ford Confidential

All Action Details for Issue

[Print](#)

VIN: 1FMCU04102K [REDACTED] Year: 2002 Model: ESCAPE Case: [REDACTED]
Name: [REDACTED] Owner Status: Original WSD: 2002-07-26
Symptom Desc: Primary Phone: [REDACTED]
Reason Desc: MISC INQUIRY - CHANGE OF ADDRESS Secondary Phone: [REDACTED]
Issue Type: 02 INFORMATION Issue Status: CLOSED

Action: UPDATE CUSTOMER ADDRESS OR PHONE NUMBER
Dealer: 01492 KEYSER & MILLER FORD INC Origin Desc: MANUAL - PHONE CSR
Odometer: 1 MI Comm Type: PHONE
Analyst Name: TANEJA, JITENDRA Analyst: JTANEJA
Action Date: 08/04/2005 Action Time: 13.52.11.961 Action Data: No

Caller Information If Different From Vehicle Owner:

First Name	Middle Initial	Last Name	Day Phone	Relationship
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	SPOUSE

Comments CUSTOMER SAID: =WANTS TO MAKE SURE THAT THE ADDRESS IS CORRECT ON THEIR PROFILE=STATES THAT THE LETTER WHICH WAS SENT OUT TO THEM BY FORD WAS NOT SENT AT THE ABOVE MENTIONED ADDRESS AND WANTS FORD TO SEND OUT ANY FORWARD COMMUNICATION TO THEIR ADDRESS ON THIS PROFILE WHICH IS: [REDACTED] OCEAN CITY, NEW JERSEY - [REDACTED] DEALER SAID: =NONECRC ADVISED: (NOTE TO CSR - THIS MAC IS TO BE USED FOR UPDATING CUSTOMER INFORMATION ONLY. DO NOT USE FOR DOCUMENTING ANY OTHER ISSUES.)=ADVISED CUST THAT THE ADDRESS IS THE SAME ON THEIR PROFILE WHICH THEY HAVE MENTIONED AND CONFIRMED THE SAME

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All Action Details for Issue

Print

VIN: 1FMCU04102K [REDACTED] Year: 2002
Name: [REDACTED] Owner Status: Original
Symptom Desc: GENERAL INQUIRIES REQUEST/NON-VEHICLE RELATED
Reason Desc: CRC RELATED - F/M CSR FOLLOWING CONTACT
Issue Type: 02 INFORMATION Issue Status: CLOSED

Model: ESCAPE Cas [REDACTED]
WSD: 2002-07-26
Primary Phone: [REDACTED]
Secondary Phone: [REDACTED]

Action: CALLBACK ADD ADDITIONAL COMMENTS

Dealer: 01492 KEYSER & MILLER FORD INC

Origin Desc: US CONCERN CASE BASE

Odometer: 45000 MI

Comm Type: PHONE

Analyst Name: LINCOLN LAZARUS

Analyst: LLINCOL1

Action Date: 08/04/2005

Action Time: 11.30.57.112

Action Data: No

Caller Information If Different From Vehicle Owner:

First Name	Middle Initial	Last Name	Day Phone	Relationship
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	SPOUSE

Comments CUSTOMER SAID: ===AS PER HISTORICALS DATED 8/1/2005===NO ONE CALLED FROM LEGAL DEPT-
NEED UPDEALERSAID: NONECRC ADVISED: PLEASE ALLOW THE REQUESTED TIME FOR THE FOLLOW UP
TO OCCUR SO THAT YOUR ISSUE MAY BE PROPERLY ADDRESSED.

Ford Confidential

Allstate Insurance Company
3800 Electric Road, Suite 301
Roanoke, VA 24018



August 31, 2005

FORD MOTOR COMPANY
PARKLANE TOWERS WEST-SUITE 300
3 PARKLANE BLVD
DEARBORN, MI 48126-2568
ATTN: SHAWN L. NORTON

RE: Claim #: [REDACTED]
Allstate Insured: [REDACTED]
Loss Date: 7-27-05
Your Claim #: UNK
Amt. of Damages: \$12,317.28 Deductible Amt.: \$500 Total Amt. of Claim: \$ 12,817.28

Dear Claims Department:

The above-noted subrogation claim has been identified as a product liability loss. In order to facilitate your handling, the information checked below is attached.

- ☒ complete description of the incident **2002-Ford Escape malfunctioned resulting in a fire, which our insured suffered property damages.**
- ☒ our statement of defect **Strict and product liability**
- ☒ product type **Ford Escape-2002**
- ☒ location of evidence **-Allstate-w/ experts**
- ☒ known manufacturer, distributor, or component manufacturer – Ford Motor
- ☒ Expert report will be coming once received. Yes ☒ No ☐
- ☒ Please base your decision based on the provided information.

If you require information not listed above, please advise me promptly. If a tender is made to another manufacturer, please notify me of the name and address of the manufacturer or distributor, as well as the contact person. Otherwise, please acknowledge receipt of this claim and your position regarding payment of our damages within 30 days. Please remit payment to: Allstate Payment Processing Center, PO Box 227257, Dallas TX 75222-7257. Please include our claim number on the check for proper processing.

Thank you very much,

Kara L. Parker
Staff Claim Associate
1-800-776-2615 ext 603

PE06-048-0421LC

MAR 02 2006



February 24, 2006

Ford Motor Company
Parklane Towers West, Suite 300
3 Parklane Blvd
Dearborn, MI 48126-2568

RE: Claim #: [REDACTED]
Our Insured: [REDACTED]
Loss Date: 7/27/05
Amt. of Claim: \$19,262.58

Attention Micki Lynn:

The above noted subrogation claim has been identified as a product liability loss. We paid our insured for their loss and are looking to you for reimbursement. Should you or your carrier need more information, please call or write me. Please remit payment to Allstate Payment Processing Center, Attn: Subro Cash, PO Box 227257, Dallas, TX 75222-7257. Please include our claim number.

Complete description of the incident: Vehicle was parked in our insured's condo garage when the vehicle caught on fire. This also caused damage to the condo, which has been presented to you under claim # [REDACTED] handled by Kara Parker in our office, and damage that was handled by the condo association insurance company CAU Insurance. The vehicle had around 32,000 miles on it at the time of the loss. Our C&O report said that the fire started in the engine compartment in the left rear upper corner. They were able to rule out other sources of the fire and said that the fire was consistent with a fire caused by a electrical defect, failure, or malfunction. They did not do destructive testing since a representative from Ford was not present, so they were not able to determine the exact cause. But based on the location where the fire started and the fact that it had been parked and not running, there is a good possibility that the speed control deactivation switch failed and caused the loss.

Our statement of defect: Strict Liability

Location of evidence: [REDACTED] Pennsburg, PA [REDACTED] Stock # [REDACTED]

Manufacturer: Ford

Model: Escape

Year: 2002

VIN: 1FMCU04102K [REDACTED]

The following information is attached:

Payment supporting paperwork

C&O report and photos

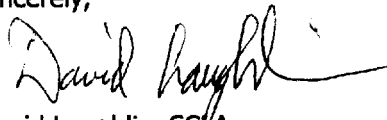
Roanoke National Subrogation Claims Center

3800 Electric Road, Suite 301, PO Box 21169, Roanoke, VA 24018
Phone: 1-800-776-2615 or (540) 989-2600 Fax: (540) 989-2640 or (540) 776-3803
Hours: 8:00 AM – 4:30 PM EST Monday - Friday

PE06-048-0422LC

Please acknowledge receipt of this claim and your position regarding payment of our damages within 30 days.

Sincerely,

A handwritten signature in black ink, appearing to read "David Laughlin", with a long horizontal flourish extending to the right.

David Laughlin, SCLA
Subrogation Senior Service Representative

5. On the aforesaid date, Plaintiff's insured was the owner of a 2002 Ford Escape, VIN number 1FMCU04102K [REDACTED]
6. On the aforesaid date, the insured vehicle was parked in a garage at the insured's home when her Ford Escape and garage caught on fire therefore causing damage to the insured vehicle and home.
7. Due to Defendant's negligence Plaintiff paid damages for the insured vehicle in the amount of \$19,262.58.
8. Due to Defendant's negligence Plaintiff paid damages for the insured's garage in the amount of \$16,225.44.
9. The electrical system failed to function properly, causing Plaintiff's insured's vehicle to catch on fire.
10. The vehicle owned by Plaintiff's insured was manufactured, designed, marketed and sold by Defendant.
11. The electrical system of the 2002 Ford Escape malfunctioned and started a fire originating in the left rear, upper corner of the engine compartment.
12. Pursuant to the aforesaid policies of insurance, Plaintiff became liable for damages that arose out of this incident.
13. Pursuant to the aforesaid policies of insurance, Common Law and governing statutes, Plaintiff is subrogated for all money paid and seeks recovery of a sum totaling \$35,488.02.

COUNT I-STRICT LIABILITY

PLAINTIFF v. FORD MOTOR COMPANY

14. Plaintiff incorporates herein by reference the allegations contained in paragraphs 1-13 above as though same were set forth herein at length.
15. Upon information and belief, the incident of July 27, 2005 was caused by the defective nature of the electrical system in Plaintiff's vehicle, which defect existed at the time the vehicle left Defendant's care, custody and control, and rendered Plaintiff's vehicle unreasonably dangerous for its intended use.

16. All of the resultant losses and damages sustained by Plaintiff resulted directly and proximately from the conduct of defendant subjecting it to strict liability in tort in the following particulars:

- (a). Defendant failed to properly and adequately design the electrical system;
- (b). Defendant failed to properly and adequately manufacture the electrical system;
- (c). Defendant failed to adequately and/or properly test and/or inspect the electrical system in order to provide a safe product;
- (d). Defendant failed to properly and/or adequately test or inspect the product in order to insure its proper working;
- (e). Defendant failed to warn Plaintiff of the dangerous nature of the electrical system;
- (f). Defendant, in the regular course of manufacturing, designing and supplying motor vehicles, sold the defective vehicle to Plaintiff;
- (g). Defendant, in the regular course of manufacturing, designing and supplying motor vehicles, sold the vehicle to the Plaintiff in an unreasonably dangerous condition;
- (h). Defendant sold the vehicle to the Plaintiff in the same condition in which defendant tested, manufactured, designed and inspected same;
- (i). The defective condition which caused Plaintiff's damages existed at the same time defendant tested, inspected and manufactured the vehicle;
- (j). The defective condition of the vehicle proximately caused the incident and Plaintiff's resulting damages; and
- (k). At the time of the incident, the vehicle was being used as intended by Defendant.

17. As the direct result of the defect in the electrical system as described above, Plaintiff's insured suffered property damage to her garage in the amount of \$35,488.02. WHEREFORE, Plaintiff demands that judgment be entered against Defendant in the amount of \$35,488.02 plus interest and costs of suit.

COUNT II-NEGLIGENCE

PLAINTIFF v. FORD MOTOR COMPANY

18. Plaintiff incorporates paragraphs herein by reference the allegations contained in paragraphs 1-17 above as though same were set forth herein at length.

19. The negligence of Defendant consisted of:

- (a). Failing to discover the defect in the electrical system when Defendant knew or should have known that such a defect existed;
- (b). Failing to take necessary steps to repair the electrical system; and
- (c). Failed to properly test the electrical system.

20. As a direct and proximate result of Defendant's negligence, Plaintiff's insured has suffered property damage to her garage in the amount of \$35,488.02.

WHEREFORE, Plaintiff demands that judgment be entered against Defendant in the amount of \$35,488.02 plus interest and costs of suit.

COUNT III-BREACH OF WARRANTY

PLAINTIFF v. FORD MOTOR COMPANY

21. Plaintiff incorporates herein by reference the allegations contained in paragraphs 1 through 20 above as though same were set forth herein at length.

22. The resultant losses and damages sustained by Plaintiff resulted directly and proximately from Defendant's breach of express and/or implied warranties of merchantability or fitness for a particular purpose, which consisted of the following:

- (a). Defendant did not have the vehicle adequately, properly and/or timely tested prior to its use;
- (b). The vehicle was not fit for the ordinary purpose for which the product is customarily used;

- (c). The Defendant knew or should have known the defective electrical system was likely to cause damage to owner's vehicle;
 - (d). The Defendant knew or should have known that Plaintiff was relying upon the expertise of the Defendant in manufacturing, designing, assembling, leasing, supplying and/or repairing the vehicle.
 - (e). In expressly or impliedly warranting that the vehicle was safe for use;
 - (f). In expressly or impliedly misrepresenting that the vehicle was safe for use.
23. As a direct and proximate result of the breach of these express and implied warranties, Plaintiff's insured has suffered damage to her vehicle and garage in the amount of \$35,488.02.

WHEREFORE, Plaintiff demands that judgment be entered against Defendant in the amount of \$35,488.02 plus interest and costs of suit.

COUNT IV-PRODUCT LIABILITY

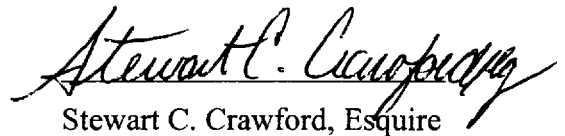
PLAINTIFF v. FORD MOTOR COMPANY

24. Plaintiff incorporates herein by reference the allegations contained in paragraphs 1-23 above as though same were set forth herein at length.
25. Upon information and belief, the incident of July 27, 2005 was caused by the defective nature of the electrical system in Plaintiff's vehicle, which defect existed at the time the vehicle left Defendant's care, custody and control, and rendered Plaintiff's vehicle unreasonably dangerous for its intended use.
26. All of the resultant losses and damages sustained by Plaintiff resulted directly and proximately from the conduct of defendant subjecting it to product liability in tort in the following particulars:
- (a). Defendant failed to properly and adequately design the electrical system;
 - (b). Defendant failed to properly and adequately manufacture the electrical system;
 - (c). Defendant failed to adequately and/or properly test and/or inspect the electrical system in order to provide a safe product;

- (d). Defendant failed to properly and/or adequately test or inspect the product in order to insure its proper working;
- (e). Defendant failed to warn Plaintiff of the dangerous nature of the electrical system;
- (f). Defendant, in the regular course of manufacturing, designing and supplying motor vehicles, sold the defective vehicle to Plaintiff;
- (g). Defendant, in the regular course of manufacturing, designing and supplying motor vehicles, sold the vehicle to the Plaintiff in an unreasonably dangerous condition;
- (h). Defendant sold the vehicle to the Plaintiff in the same condition in which defendant tested, manufactured, designed and inspected same;
- (i). The defective condition which caused Plaintiff's damages existed at the same time defendant tested, inspected and manufactured the vehicle;
- (j). The defective condition of the vehicle proximately caused the incident and Plaintiff's resulting damages; and
- (k). At the time of the incident, the vehicle was being used as intended by Defendant.

27. As the direct result of the defect in the electrical system as described above, Plaintiff's insured suffered property damage to her vehicle and garage in the amount of \$35,488.02.

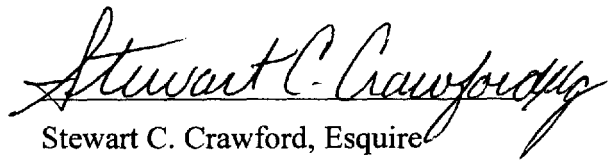
WHEREFORE, Plaintiff demands that judgment be entered against Defendant in the amount of \$35,488.02 plus interest and costs of suit.


Stewart C. Crawford, Esquire

DATE: 9/13/2004

VERIFICATION

The undersigned hereby states that he is an authorized agent of Plaintiff insurance company in this action and verifies that the statements contained in the foregoing Complaint are true and correct. The undersigned understands that false statements herein are made subject to the penalties of 18 Pa. C.S. § 4904, relating to unsworn falsification to authorities.



Stewart C. Crawford, Esquire

Attorney for Plaintiff

Date: 9/13/2004

DJS Associates, Inc.

Forensic Engineering Services • Expert Network • Multi-Media Exhibit Systems®

Corner of Old York Road & Hamilton Avenue
1603 Old York Road
Abington, PA 19001

PA (215) 659-2010
Out of State (800) 332-6273
Fax: (215) 659-7156

Internet: www.forensicDJS.com
E-Mail: experts@forensicDJS.com

[REDACTED]
Our File No.: [REDACTED]
Your File No.: [REDACTED]

RECEIVED
OCT 31 2005
Willow Grove MCO

Prepared for:

David Kirkner, Adjuster
ALLSTATE INSURANCE
309 Lakeside Drive
Suite 100
Horsham, PA 19044

DJS Associates, Inc.

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E-Mail: experts@forensicDJS.com

October 28, 2005

David Kirkner, Claims Specialist
ALLSTATE INSURANCE CO
309 Lakeside Drive, Suite 100
Horsham, PA 19044

Re: [REDACTED]
Claim No.: [REDACTED]
Our File No.: D788-KD

Dear Mr. Kirkner:

Pursuant to your request, we have reviewed the information received relative to the above-referenced matter. What follows is a summary report based on a review of the information received, as well as an inspection of the Susan Venezia vehicle.

The information reviewed included a verbal account of an incident involving the [REDACTED] vehicle. Additionally, on August 19, 2005, this office conducted an inspection of the [REDACTED] vehicle. During the inspection, photographs were taken and measurements were recorded.

Listed below are findings and conclusions resulting from our inspection of the [REDACTED] vehicle and a study and analysis of the information reviewed to date.

1. According to the information provided, on July 27, 2005 the [REDACTED] vehicle was parked in the garage to the [REDACTED] home when the vehicle and garage were damaged by fire. You asked us to inspect the [REDACTED] vehicle and determine, if possible, the cause and origin of the fire.
2. The [REDACTED] vehicle was a 2002 Ford Escape bearing vehicle identification number 1FMCU04102K [REDACTED]. It was a four-wheel drive sport utility vehicle equipped with a six-cylinder engine, automatic transmission, and cruise control. During our inspection, we made the following observations:

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PE06-048-0432LC

David Kirkner, Claims Specialist

File No.: D788-KD

Date: October 28, 2005

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- A. The vehicle had fire damage. Generally, this damage was limited to the engine compartment and front body components. For example, many combustible components within the engine compartment were consumed, burned or melted. By comparison, there was relatively little fire and heat damage within the passenger compartment and of that, most was located in the driver's footwell area, on the bulkhead. Further, there was no damage rearward of the vehicle 'B' pillar. Thus, the physical evidence was consistent with a fire originating in the engine compartment.
 - B. Generally, within the engine compartment, the magnitude of fire damage diminished left-to-right, high-to-low, and back-to-front. That is, the damage was greatest in the left rear, upper corner of the engine compartment. For example, most of the combustible components located in this area were completely consumed while similar components elsewhere in the engine compartment had significantly less damage. Similarly, the front exterior body panels surrounding, and adjacent to, the left rear, upper portion of the engine compartment possessed markedly greater oxidation than other areas of the front panels. Accordingly, the physical evidence was consistent with a fire originating in the left rear, upper portion of the engine compartment.
 - C. There was little, if any, smoke, heat, or fire damage on any undercarriage component, including those beneath the engine compartment. This physical evidence is consistent with the fire not originating under the vehicle, whether by a non-vehicle object such as paper or carpeting, or by dripping engine fluids; rather, this physical evidence is consistent with a fire resulting from a vehicle defect located within the area of greatest damage. The battery and main electrical harness are located within that area. Given that fire is among the consequences of an electrical defect, failure or malfunction, and given the proximity of the battery and wire harness to the area of greatest damage, the cause of the fire is therefore consistent with an electrical defect, failure, or malfunction.
 - D. Within the engine compartment, most of the vehicle components were destroyed and/or altered from their pre-fire condition. Accordingly, any physical evidence that could identify the fire's cause was likely altered, damaged or destroyed.
 - E. There was no physical evidence of any aftermarket alterations or modifications to the vehicle. That is, there was nothing to indicate that the vehicle had been altered from its original manufactured condition.
3. According to our most recent research, the 2002 Ford Escape is not the subject of any recall that could reasonably be correlated to the cause of the fire. Further, there have been no investigations initiated by the Office of Defects Investigations pertaining to fires in the 2002 Escape model. There have been four consumer complaints, as indicated by the National

David Kirkner, Claims Specialist
File No.: D788-KD
Date: October 28, 2005
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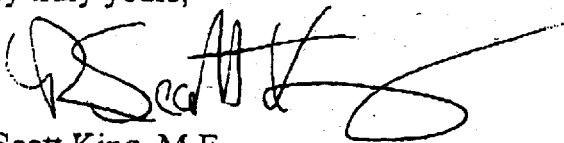
Highway Traffic Safety Administration database, of engine compartment fires. One such complaint specified that the fire originated in the left rear, upper corner of the engine compartment.

Listed below are the opinions that have been reached as a result of our study and analysis of the information reviewed to date. These opinions have been reached within a reasonable degree of engineering certainty.

1. The fire originated in the left rear, upper corner of the engine compartment.
2. The fire was not the result of post-manufacture vehicle alterations.
3. The fire was not the result of parking atop papers, carpeting, or other non-vehicle items.
4. The physical evidence was consistent with a fire caused by a vehicle electrical defect, failure or malfunction.
5. Because our inspection was non-invasive and non-destructive, we are unable to determine the precise cause of the fire. Additional data and/or potentially invasive/destructive inspection procedures could assist in determining the fire's cause.

Please forward any additional data to this office, as it becomes available. We will review such data and revise our analysis as required. Further, we recommend you consider having expert representation at any future, adverse-party vehicle inspection. If you have any questions, please contact me directly.

Very truly yours,



R. Scott King, M.E.
Automotive Engineering Consultant

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DJS Associates, Inc.
File# D788-KD
Date of Photograph: 8/19/2005

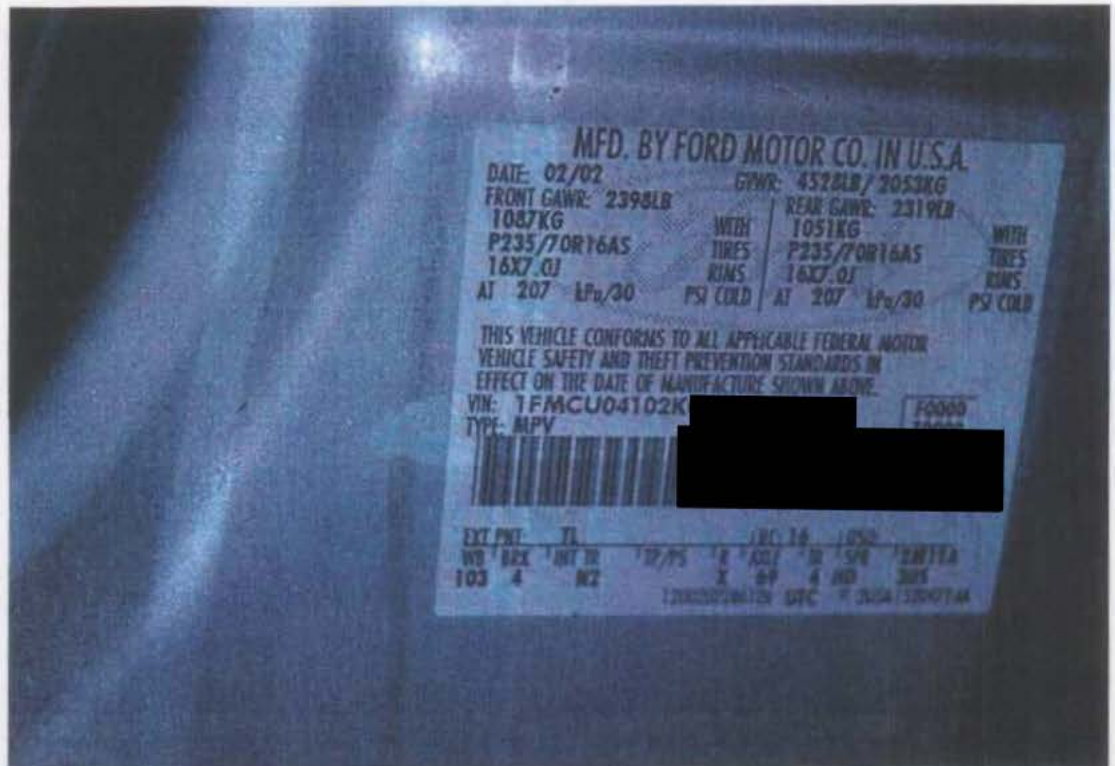


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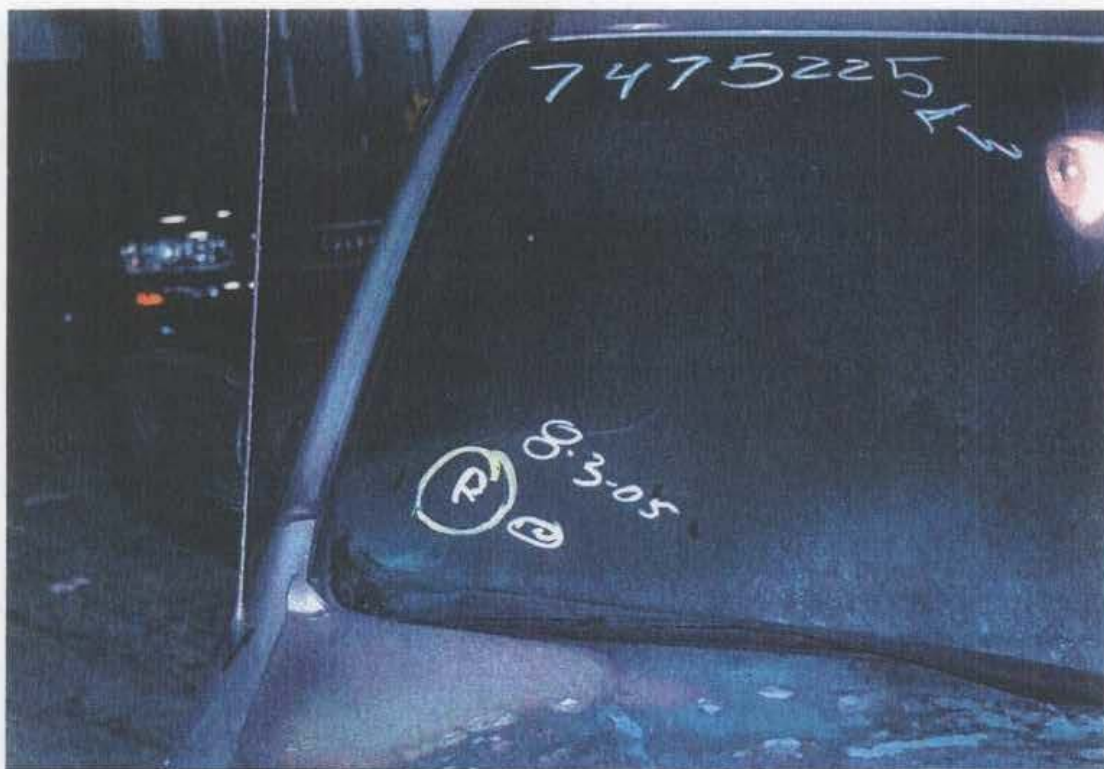


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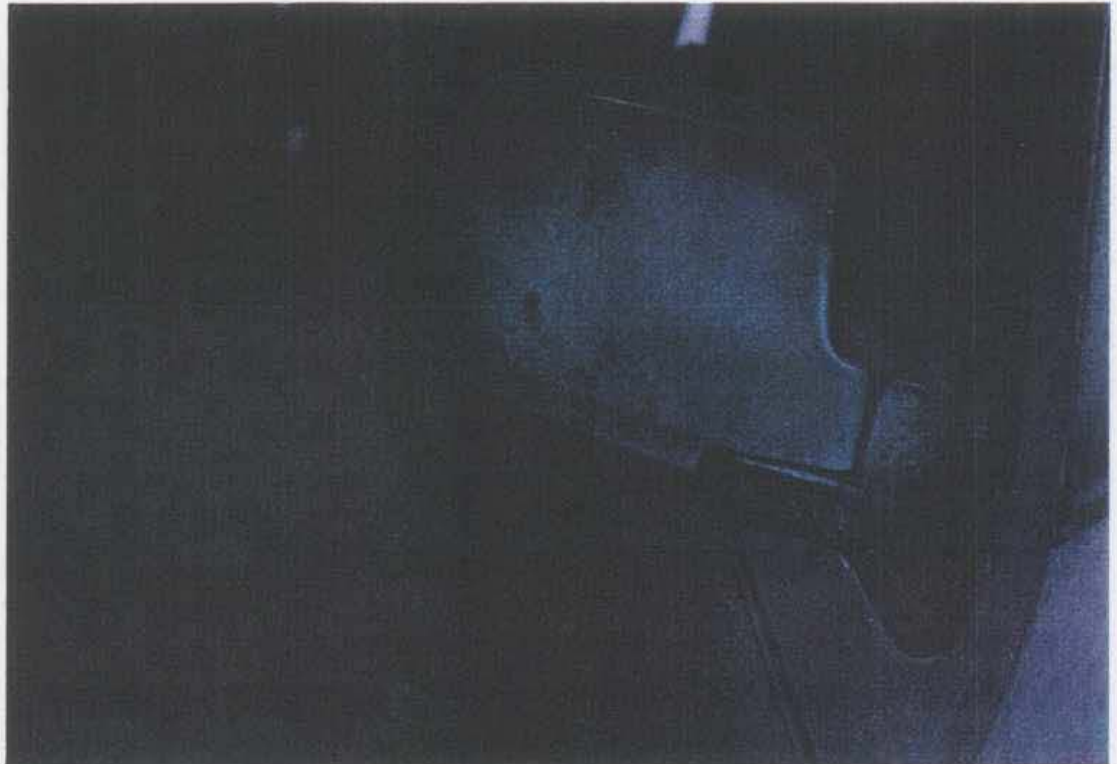


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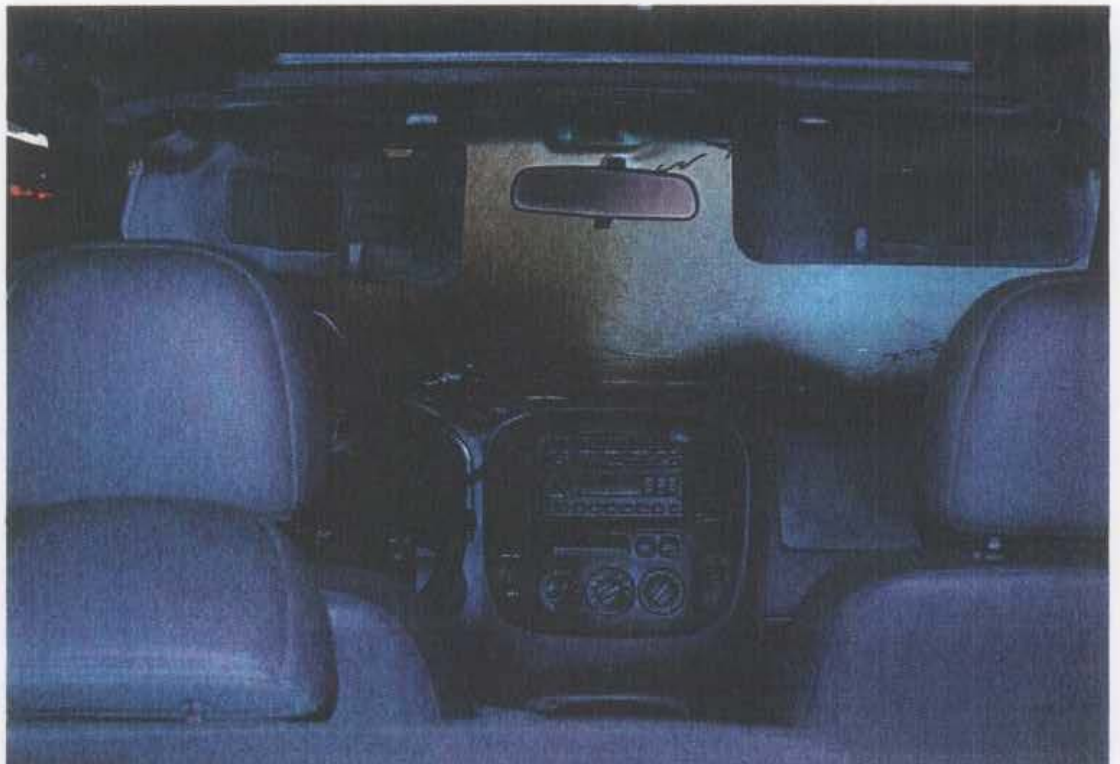


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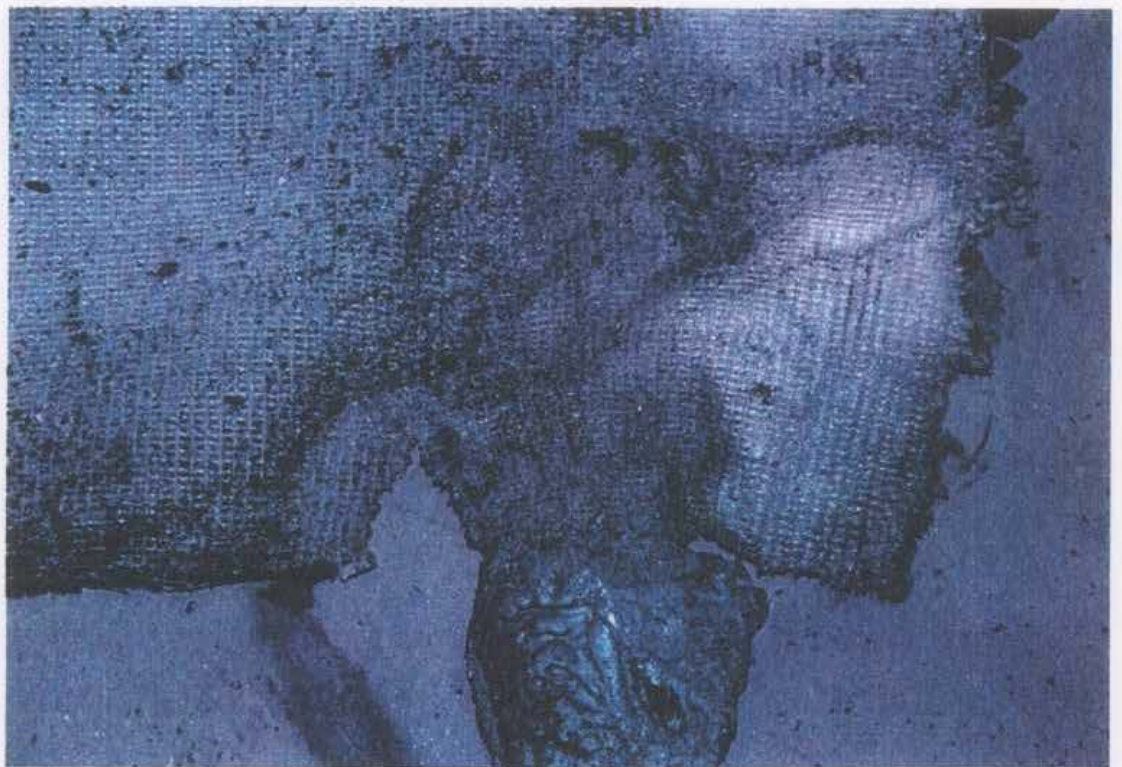


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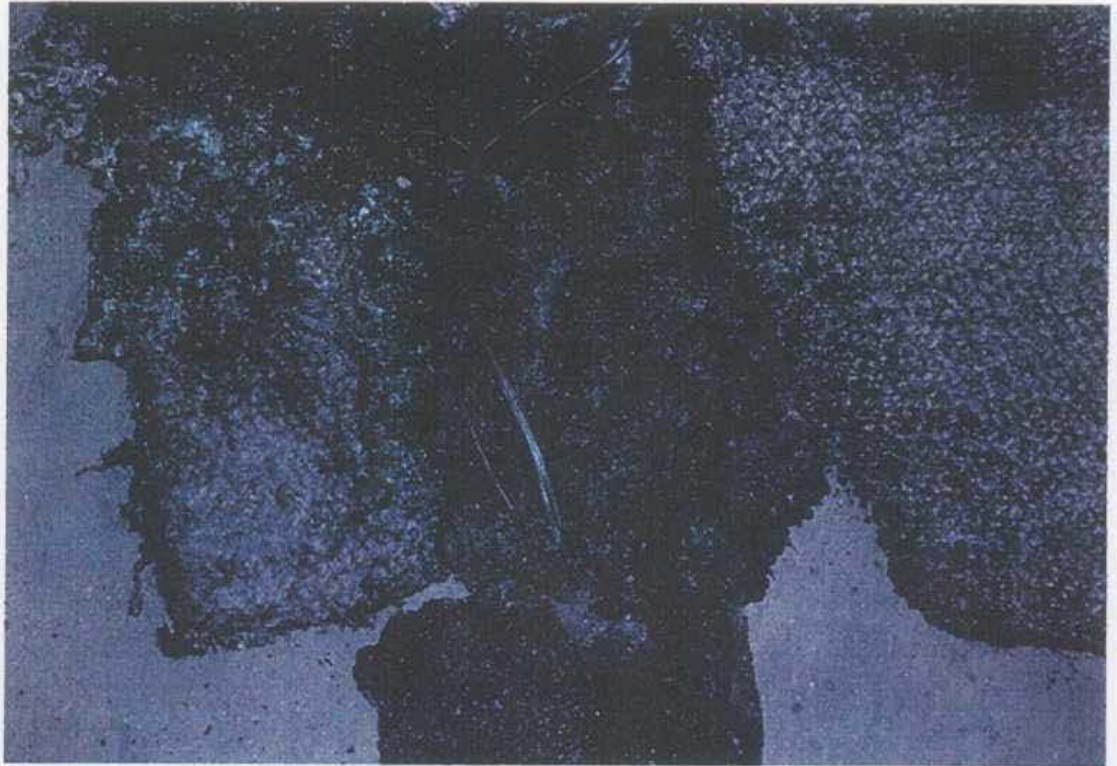


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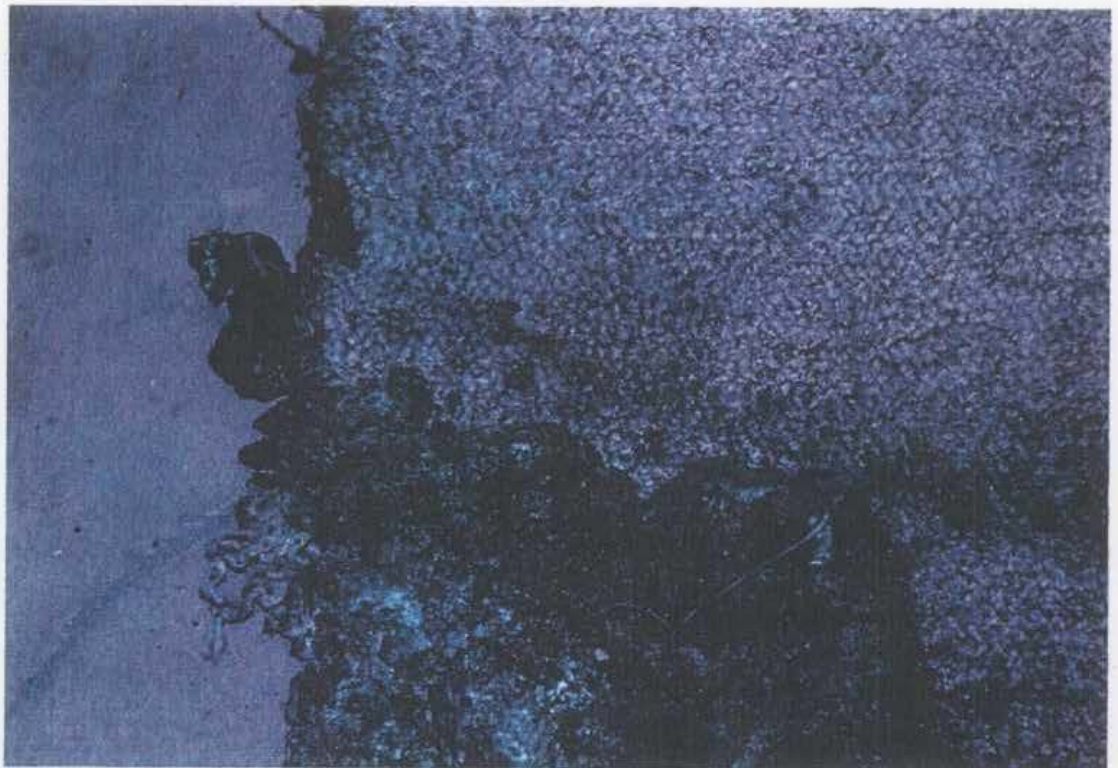


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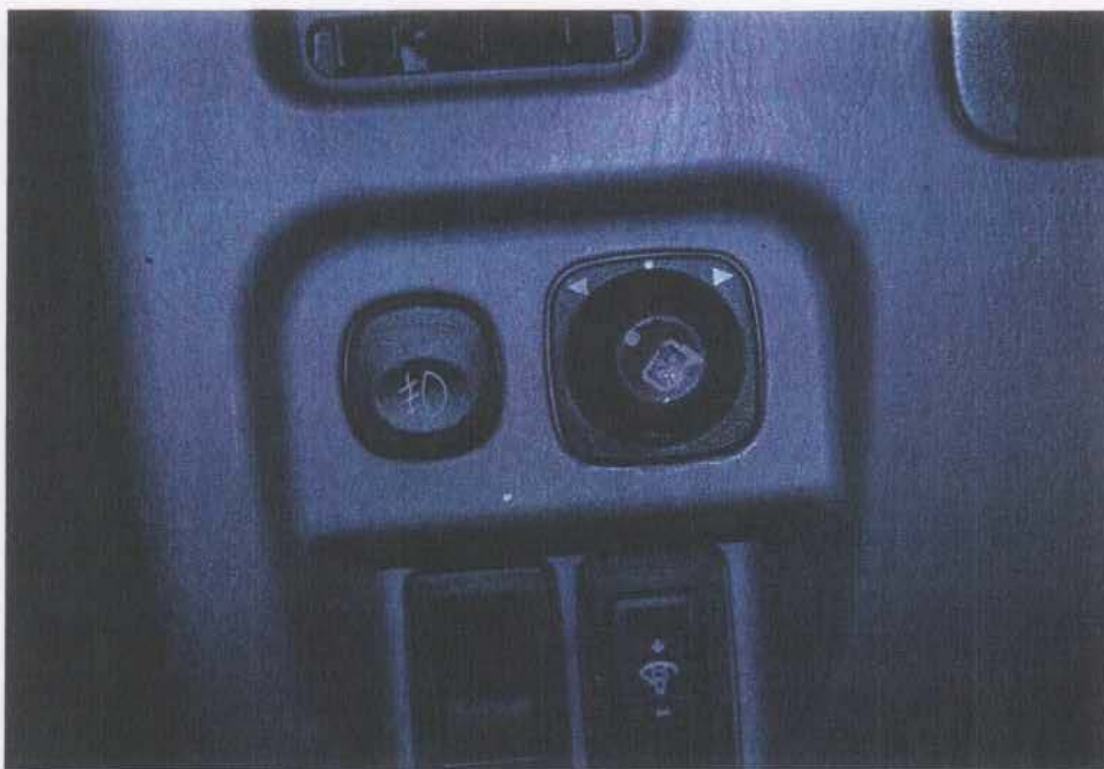


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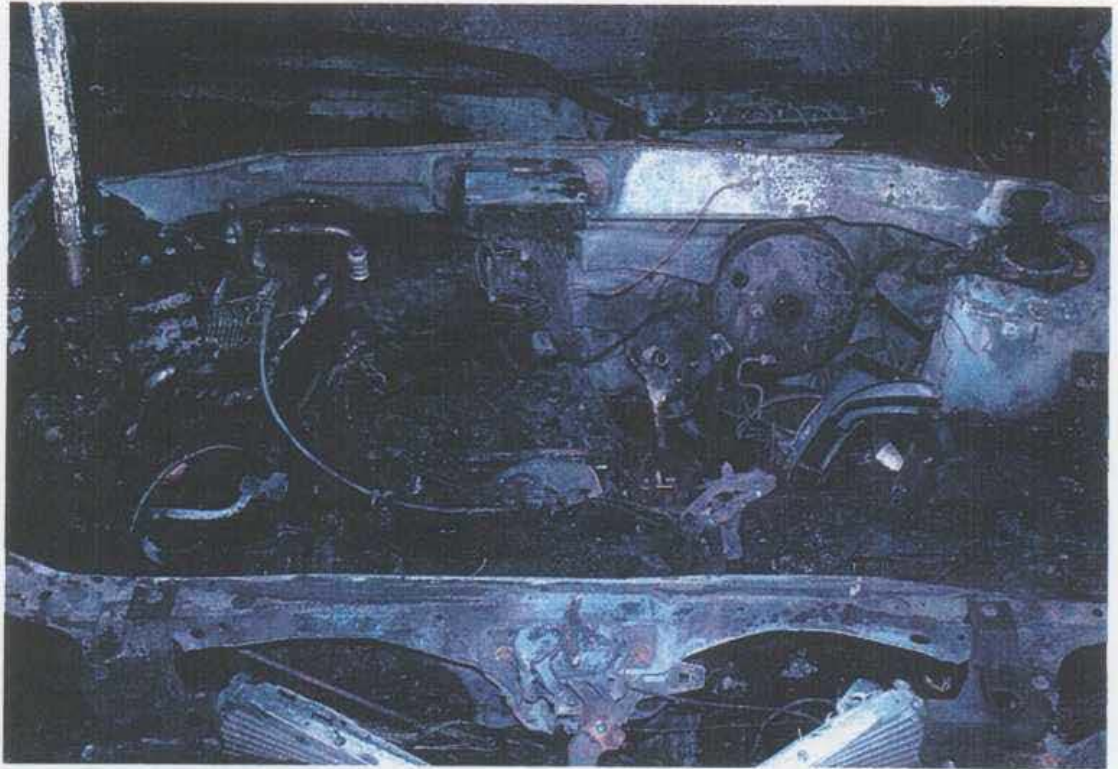


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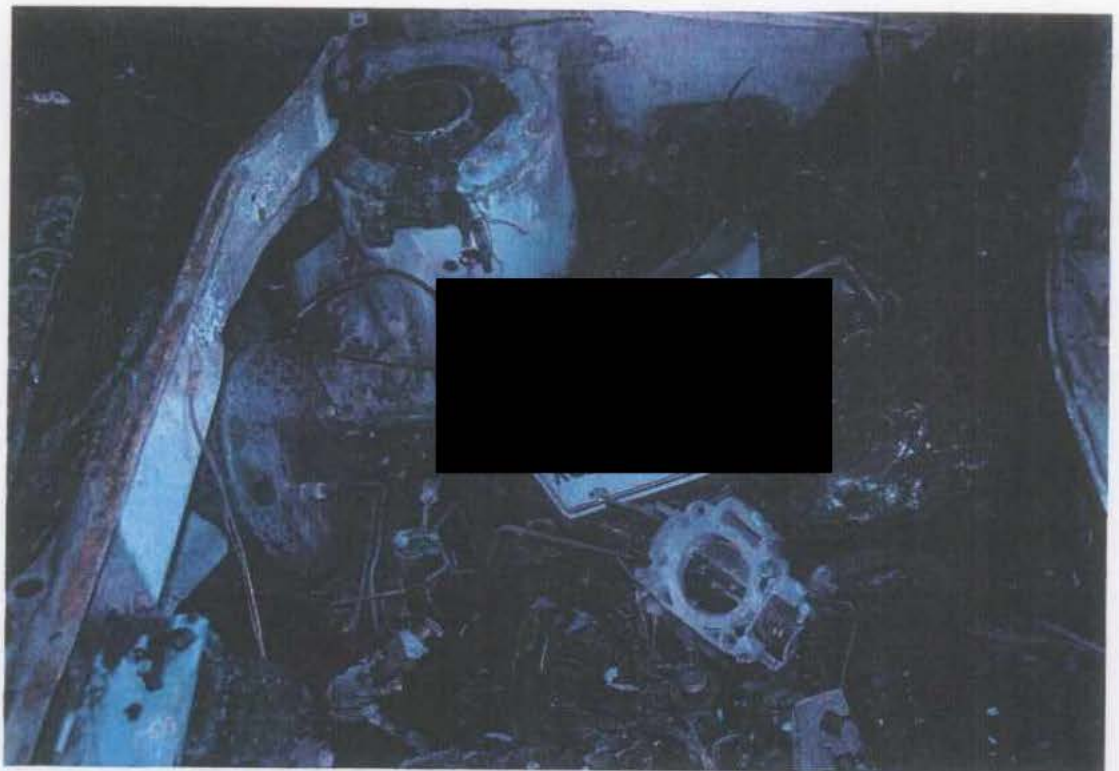


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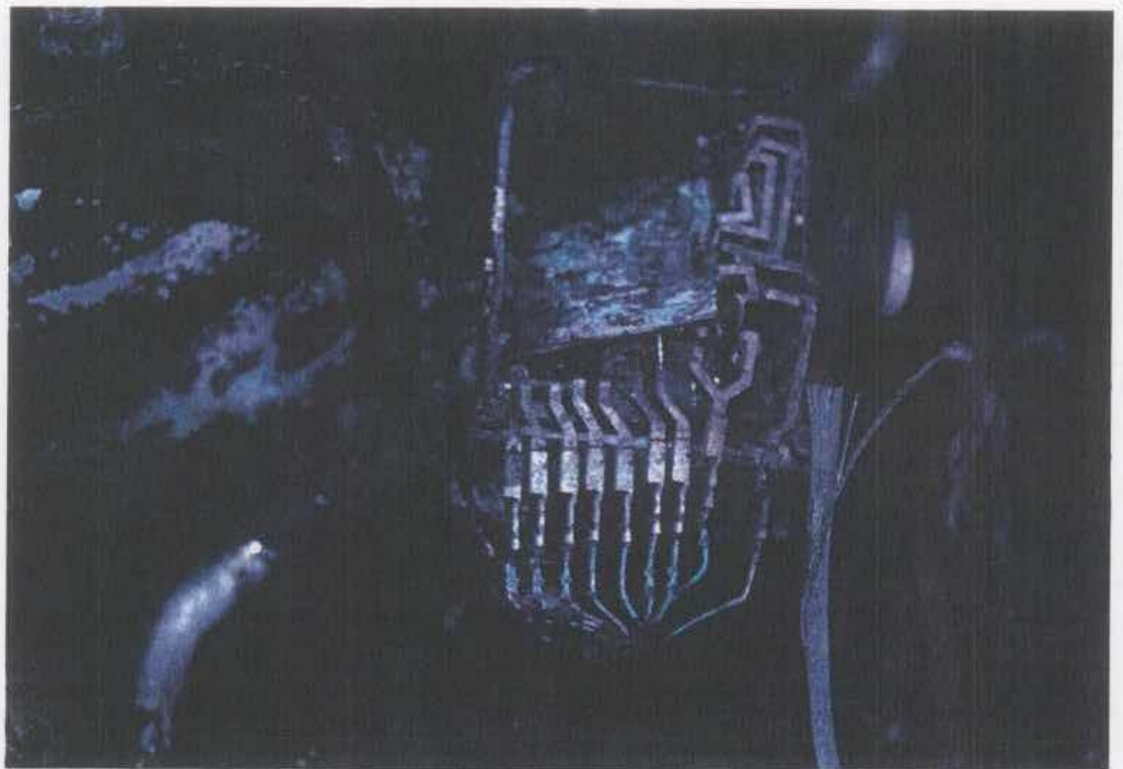


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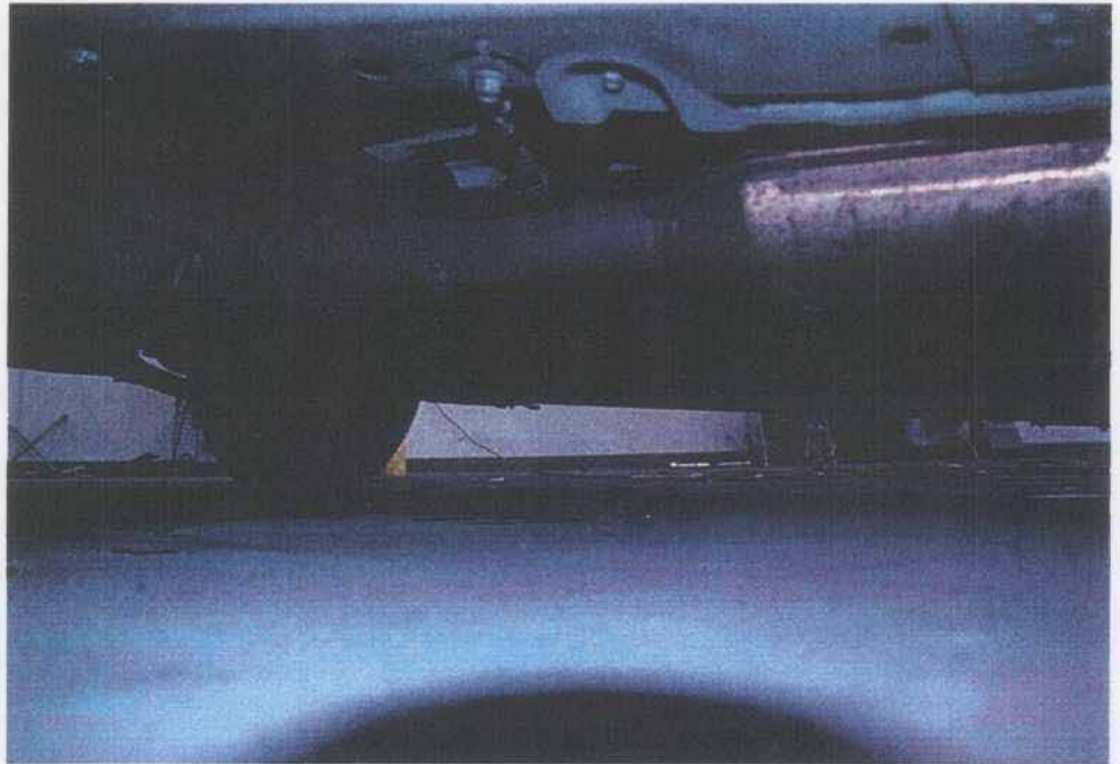


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11
TFIC

TFIC
P O Box 607
Crossville, TN 38555

Phone: 931-484-5131
Fax: 931-484-0303

CUSTOMER
RELATIONSHIP
CENTER

Wednesday October 12, 2005

2005 OCT 19 A 7:39

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

OCT 20 2005

RE: Insured: [REDACTED]
Claim #: [REDACTED]
Loss Date: 09-02-05

Dear Sirs:

FORD MOTOR COMPANY
RECEIVED

OCT 21 2005

This letter comes to you in regards to the above captioned claim. TN Farmers Mutual has paid our insured, [REDACTED], for a total loss to her 2003 Ford Escape resulting from a fire. The vehicle has approximately 24,000 miles on it at the time of the fire.

We are seeking recovery from Ford Motor Company due to what appears to be a warranty issue. We paid for the vehicle per NADA retail value. This does not include any disposal fees that we might incur in the future.

If your engineers would like to inspect this vehicle, it is located at Sadisco of Orlando at 3701 South Sanford Avenue in Sanford Florida. Their phone number is 407-320-9950.

We would expect a response within 20 business days of the date of this letter.

Very truly yours,

TENNESSEE FARMERS MUTUAL INSURANCE COMPANY

Josh Lintz
JOSH LINTZ
Field Claims Representative

PE06-048-0482LC

A Privileged and Confidential Report

Prepared For

**Tennessee Farmers Mutual Insurance Company
c/o Mr. Josh Lintz**

Insured

[REDACTED]

Policy Number

[REDACTED]

Claim Number

[REDACTED]

TechniFire Number

[REDACTED]

TechniFire Services Company^{LLC}

Insured:

[REDACTED]

Policy Type:

Auto Coverage

Date of Loss:

September 2, 2005

Loss Location:

Orlando, FL

Risk Information:**Make:**

Ford

Model:

Escape

Year:

2003

VIN:

1FMYU03163K [REDACTED]

Mileage:

~ 24,000 per insured

Notes:

The insured reports that the vehicle was being towed behind his motor home at the time the fire occurred. The vehicle was on a dolly and no power source from the motor home was connected to the vehicle at the time of the fire. The insured reports that he has experienced no problems with the vehicle. The only recent maintenance involved an oil change. He was driving on the Florida turnpike when he saw smoke coming from the rear of his motor home. He stopped and on investigation discovered a fire at the underside of the hood on the left side of the motor compartment. He was able to detach the vehicle from the motor home prior to flame damage to the motor home. He also reports that the vehicle had been driven earlier in the day and that everything was operating okay at that time.

File History

Jerry Carter is the assigned investigator representing TechniFire Services Company.

On September 12, 2005, this file was established under the direction of Mr. Josh Lintz, who represents Tennessee Farmers Mutual Insurance Company in Crossville, Tennessee.

On September 19, 2005, the salvage examination was conducted at Sadisco in Sanford, Florida.

On September 20, 2005, a verbal report was provided to Mr. Lee Brooks.

A subsequent verbal report was provided to Mr. Josh Lintz.

During the investigation:

- a) the salvage was examined for origin and cause determination;
- b) information was provided by the insured; and
- c) information was provided by Tennessee Farmers Mutual Insurance Company.

Instructions Received:

The following instructions were provided upon receipt of this assignment:

Conduct salvage inspection for O&C

Persons referred to in this report:

[REDACTED]	Insured
Mr. Josh Lintz	TN Farmers Mutual Insurance Co.
Mr. Lee Brooks	TN Farmers Mutual Insurance Co.

Subrogation potential:

Subrogation may exist against the vehicle manufacturer.

Origin and Fire Spread

The fire began at the left rear quadrant of the motor compartment. Flame development was to the plastic and rubber components including the wiring insulation and reservoir for the master cylinder.

The fire did spread throughout the motor compartment where a significant amount of damage did occur. The fire also spread through the firewall/bulkhead into the dash area where damage to the dash components at the driver side also occurred. Heat and flame impingement on the windshield did result in its degradation, which ultimately resulted in heat and flame impingement at the front of the passenger compartment.

The area of heaviest flame degradation was at the left rear quadrant of the motor compartment. Melting and degradation of the aluminum components located in that area also occurred. The left front tire did ignite and burn during the course of the fire resulting in a significant amount of damage at the left front fender and left side of the motor compartment.

The fire was extinguished prior to total vehicle involvement but not before significant damage occurred. In fact, it does appear that the vehicle is a total loss.

Fire Causation

The most probable cause of the fire is a failure of the electrical components located at the left rear quadrant area. Located in this area is the speed control deactivation switch. Heavy degradation of the electrical components including the speed control deactivation switch did occur during the course of the fire.

A close examination of the wiring harness conductors located at the area of origin showed that they were damaged as a result of heat and flame impingement. Although no overt evidence of shorting or arcing was found on the wiring conductors, the heavy degradation at the master cylinder area does indicate a most probable failure of the speed control deactivation switch.

The vehicle was not in operation at the time of the fire, thus eliminating the operation of the motor or transmission as potential fire causes. This also includes the fuel system, which would not have been functioning at the time of the fire. The fire flow, burn and char patterns on the remains of the motor as well as the left front fender, firewall/bulkhead and adjacent components do indicate the fires inception adjacent to the location of the master cylinder and the adjacent electrical components including the speed control deactivation switch. The oxidation and demarcation patterns on the hood, firewall/bulkhead and the adjacent motor compartment components further indicate the fires inception at the left rear quadrant at the location of the master cylinder and speed control deactivation switch.

There was no evidence found to indicate that the fire occurred as a result of an incendiary cause nor was there any indication of after-market components at the motor compartment area or within the passenger compartment.

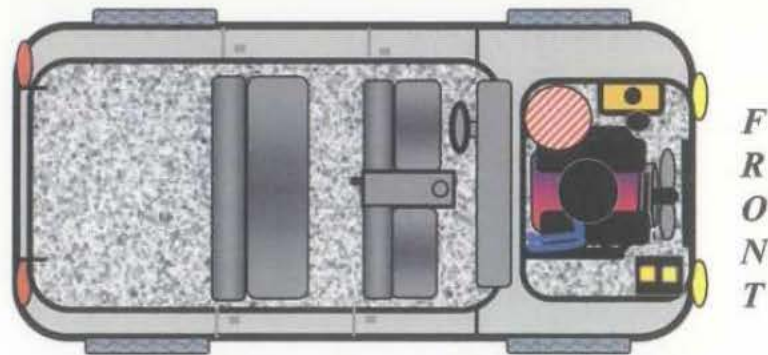
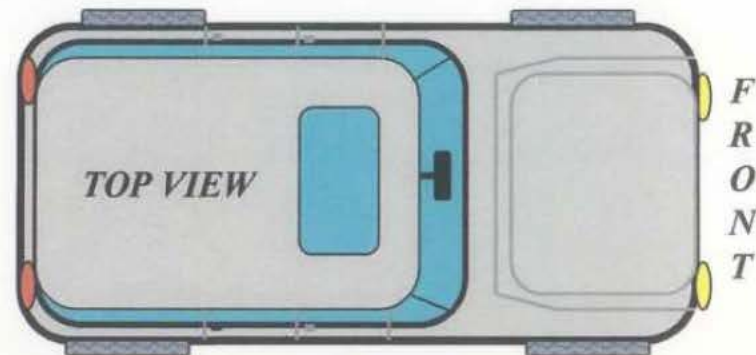
Insured: [REDACTED]

DOL: 09-02-05

Policy No.: [REDACTED]

Claim No.: [REDACTED]

TechniFire No. : [REDACTED]



INTERIOR VIEW



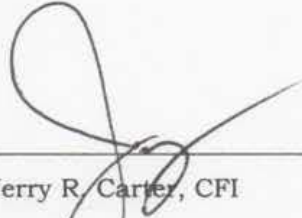
UNDERSIDE
VIEW



Area of Origin

Note: Not to scale, for illustration only.

Submitted this 27TH day of September, 2005.

A handwritten signature in black ink, consisting of a large loop followed by a series of smaller loops and a final horizontal stroke.

Jerry R. Carter, CFI

TechniFire Services Company
P. O. Box 17356
Chattanooga, TN 37415
(423) 876-1700



Photo Information

1. Front and driver side of the vehicle.(4A)



Photo Information

2. Rear and driver side of the vehicle.(7A)



Photo Information

3. Rear and passenger side of the vehicle.(6A)



Photo Information

4. Front and passenger side of the vehicle.(5A)



Photo Information

5. The right rear tire and wheel showing tread design and condition.(9A)



Photo Information

6. The fuel filler neck showing the cap to be in place.(8A)

**Photo Information**

7. Overview of the center and driver side of the undercarriage, underside of the motor assembly and transmission. Damage did occur as a result of drop-down burning. There is no evidence of the fires inception at the undercarriage area.(1A)

**Photo Information**

8. Additional view of the undercarriage. All components were found in their appropriate locations.(2A)



Photo Information

9. The rear cargo storage area showing damage as a result of heat and smoke.(10A)



Photo Information

10. The back seating area showing damage as a result of heat and smoke, but no evidence of the fires development at the seat or floorboard.(11A)



Photo Information

11. The front seating area. Note that the heaviest degradation is at the driver side.(12A)



Photo Information

12. Additional view of the front seating area showing no evidence of the fires development at the seats or floorboard.(15A)



Photo Information

13. The dash. All components were found in their appropriate locations.(14A)



Photo Information

14. Additional view of the dash showing the remains of the instrument cluster. The damage to the dash is the result of heat and flame impingement from the fires inception at the adjacent motor compartment.(17A)

**Photo Information**

15. Additional view of the dash. Again note that the heaviest degradation is at the driver side and is due to heat and flame impingement from the fire at the motor compartment. The fire did not begin within the dash.(19A)

**Photo Information**

16. The hood and front grill area. The hood was down and latched at the inception of the fire.(22A)



Photo Information

17. Overview of the motor compartment and underside of the hood. The area of heaviest degradation is at the left rear quadrant.(23A)



Photo Information

18. The driver side of the motor compartment. All components were found to have been in their appropriate locations at the time the fire occurred. Again note that the heaviest degradation is at the left rear quadrant.(24A)

**Photo Information**

19. The passenger side of the motor compartment. Again all components were found in their appropriate locations and the heaviest degradation is at the left rear quadrant adjacent to the master cylinder and speed control deactivation switch.(25A)

**Photo Information**

20. The battery and primary electrical wiring showing no evidence of overt shorting or arcing, but damage due to heat and flame impingement.(26A)



Photo Information

21. The oil dipstick showing the level to be full.(29A)



Photo Information

22. The transmission dipstick. An accurate level could not be determined due to degradation of the dipstick assembly; however, transmission fluid was present at the sump.(27A)

**Photo Information**

23. Overview of the area of origin. The oxidation, demarcation and burn patterns do indicate the fires inception at the master cylinder and speed control deactivation switch location.(30A)

**Photo Information**

24. Additional view of the area of origin. Again the burn and char patterns on the motor assembly, firewall/bulkhead and left front fenders do indicate the fires inception at the location of the master cylinder where the speed control deactivation switch is positioned.(2)

**Photo Information**

25. Close up view of the left front fender showing the remains of the wiring harness conductors. Damage did occur as result of heat and flame impingement.(32A)

**Photo Information**

26. Additional view of the left front fender and the firewall/bulkhead area again showing wiring harness conductor remains. Note that the master cylinder aluminum and plastic components were heavily degraded during the course of the fire.(33A)

**Photo Information**

27. Additional view of the area of origin. Again the oxidation, demarcation and burn patterns do demonstrate the fires development at the location of the master cylinder and speed control deactivation switch at the left rear quadrant.(35A)

**Photo Information**

28. The underside of the hood. The oxidation and demarcation patterns further demonstrate the fires development at the left rear quadrant adjacent to the master cylinder and speed control deactivation switch mounting location.(34A)

**Photo Information**

29. The hood exterior. Again the oxidation and demarcation patterns demonstrate the fires development at the left rear quadrant of the motor compartment.(6)

**Photo Information**

30. The windshield frame and adjacent roof. Again the burn and char patterns further indicate the fires inception at the left rear quadrant of the motor compartment where the master cylinder and speed control deactivation switch are positioned.(10)

TFMIC

TFMIC
P O Box 607
Crossville, TN 38555

Phone: (931) 484-5131
Fax: (931) 484-0303

519333

[Handwritten signature]

Tuesday January 17, 2006

Ford Motor Company
Consumer Affairs
ATTN: Micki Lynn
P O Box 6248 MD-3NE-B
Dearborne, MI 48126

JAN 30 2006

[Handwritten initials]

RE: Insured: [REDACTED]
Claim#: [REDACTED]
DL: 09-02-05
Amount Due: \$ 20,009.00

Dear Sirs:

Investigation of the above loss indicates your insured is legally responsible for resulting damages.

We have paid our insured and are subrogated to the above stated amount, which includes our insured's deductible. Documentation of damages is attached.

We request your company check payable to Tennessee Farmers Mutual Insurance Company as subrogee of the above insured.

Very truly yours

TENNESSEE FARMERS MUTUAL INSURANCE COMPANY

[Handwritten signature: Josh Lintz]
JOSH LINTZ
Field Claims Representative

JL:dc

Enclosure

STATEMENT OF MARK TOMLIN

MK-- [REDACTED]

JL--Joshua Lintz

JL--This is a recorded conversation between myself, Joshua Lintz claims adjuster for Tennessee Farmers Mutual, and [REDACTED] concerning the total fire loss of his 2003 Ford Escape on September 2nd of 2005. Uhm, [REDACTED] do I have your permission to record this statement?

MT--Yes you do.

JL--Can you state your full name for the record?

MT-- [REDACTED]

JL--And your address?

MT-- [REDACTED] Crossville TN.

JL-- [REDACTED] can you tell me from the events prior or leading up to the fire of the vehicle, what was the events of that day?

MT--Well, I was in Florida on some personal business and about to return to Tennessee and I was asked to uh, pick up an RV and uhm, decided to tow my personal vehicle, the Escape, back on the RV via a dolly. Did the hook up, drove the car to the sight, did the hook up and uh, got on the Florida Turnpike heading north and I got about an hour out, to just past GR Junction, uh noticed smoke coming

from the, from the towed vehicle in the rear view mirror, pulled to the side and by the time I got back to it, it was engulfed in flames. Uh, I did what I could to get it off of the back of the vehicle. I had a hard time with that. I had a couple of passersby stop and help me. This time, at this time the flames were probably three or four foot in the air from under the hood and the wheel well areas, we were able to get it attached and thankfully got the motor home away from it so that it didn't catch fire. Uh, a short time later uh, fire rescue showed up and put the flames out and at that point the flames were probably twenty feet in the air.

JL--And what was the time limit between you driving your vehicle and the vehicle catching fire?

MT--About one hour.

JL--About one hour, uh were the keys in the ignition?

MT--Uh, I believe they were.

JL--Uh, were there any after-market or modifications to this vehicle?

MT--Uh, a couple of accessory hangouts on the outside of the vehicle, sun visors and uh, some pin striping and I think that was it.

JL--Was the vehicle purchased new or used?

MT--Brand new.

JL--Brand new, can you recall the purchase date?

MT--I would only be guessing if I did. It seemed to me it was in July of 2003.

JL--Mileage at the time of the purchase.

MT--Uhm, 1.

JL--And who was the vehicle purchased from?

MT--Advantage Ford in Stewart Florida.

JL--What was the actual City?

MT--Stewart Florida.

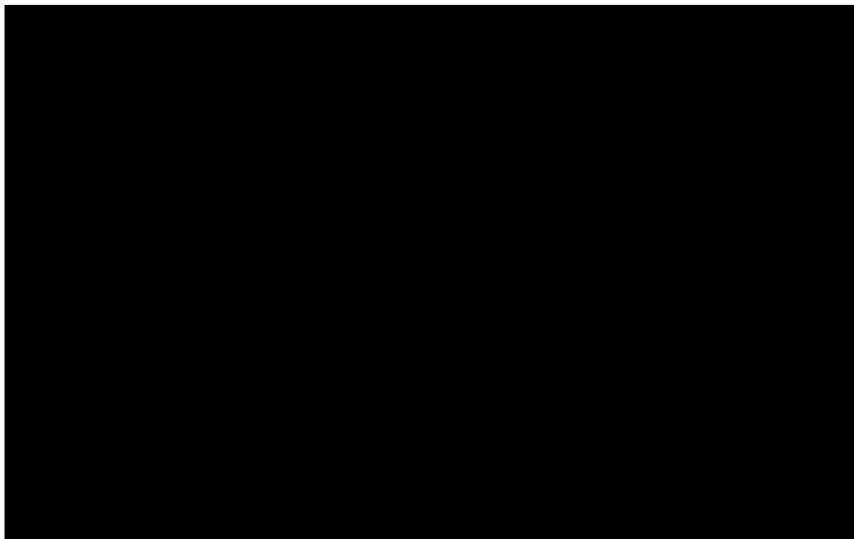
JL--Stewart Florida?

MT--Yep.

JL- [REDACTED] is everything you have said true and correct to the best of your knowledge?

MT--Yes it is.

JL--Alright, this ends the conversation between [REDACTED] and myself, Josh Lintz, uh the time is now 9, excuse me, 8:40. The date is January 13th, 2006. End of tape.



ChoicePoint



ChoicePoint Police Records
P.O.Box 740167
Atlanta, GA 30374-0167
Phone: 1.800.934.9698 Fax 1.800.934.6449
Email: orderpoint.support@choicepoint.com

REPORT ATTACHED

PAGE COUNT: 3

CLIENT : 010
DIVISION : 01
ADJUSTER : 02S752
CLAIM : [REDACTED]

TRANSACTION # : [REDACTED]
DATE : 05/22/2006

DATE OF LOSS : 04/08/2005 TIME OF LOSS : 04:00 PM
STREET : [REDACTED]
CITY : SAVANNAH
COUNTY : CHATHAM
STATE : GA

INVESTIGATING AGENCY : SAVANNAH CHATHAM METRO PD
REPORT NUMBER : [REDACTED]
REPORT TYPE : Fire Car
PARTY 1 : JOHN MAXIM
PARTY 2 : FORD MOTOR COMPANY
PARTY 3 :

CAR : MAKE : FORD YEAR : 02
TAG :

DRIVER LICENSE : [REDACTED]
ADDITIONAL INFO :

NOTE :

PE06-048-0508LC

SAVANNAH-CHATHAM METROPOLITAN POLICE DEPARTMENT

Preliminary Report



Incident Vehicle Fire	Report Date 040805	CC 8751
From Date	From Time	To Date (Occur.) 040805
Precinct	Beat	Neighborhood
Unit	PRN	

Business	Business Address	City	State	Zip
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PERSON INVOLVED				
1	Involvement VIC	Name [REDACTED]	Race W	Sex M
2	Involvement	Name	Race	Sex
3	Involvement	Name	Race	Sex
4	Involvement	Name	Race	Sex
5	Involvement	Name	Race	Sex
6	Involvement	Name	Race	Sex
7	Involvement	Name	Race	Sex
8	Involvement	Name	Race	Sex

SUMMARY NARRATIVE				
[REDACTED] reports that while traveling South on I-95 just before [REDACTED] 106 he noticed smoke coming from the hood of the listed vehicle. He advised that he stepped out of the vehicle to check under the hood when he saw that it was on fire. He advised that he got his possessions from the vehicle, stepped away and called 911. A bypasser who stopped at the scene of the fire transported [REDACTED] to the airport. The vehicle was towed by S&S towing. [REDACTED] was issued A CENL. No further.				

Cleared by	CHG ☐	SER ☐	ADM ☐	EX CLR ☐	UNF ☐	Total No. Arrested Adult Juvenile	Will Victim Prosecute Yes ☐ No ☒	Elderly Yes ☐ No ☒
Forensics Requested Yes ☐ No ☒	Domestic Violence Yes ☐ No ☒	Evidence Yes ☐ No ☒	Gang Yes ☐ No ☒	Detective Called Yes ☐ No ☒				
SUBMITTED BY PRM Babura		PRN 600131	SUPERVISOR SGT. B. K. Downing			PRN 60040		

CMPD FORM 1077 (06/04)

SAVANNAH-CHATHAM METROPOLITAN POLICE DEPARTMENT

VEHICLE/ PROPERTY										CRM					
VEHICLE #															
Involvement		Veh. Type		License No.		Lic. State		Lic. Year		Lic. Type		VIN #			
						SC		06				1FMYUC 31921			
Veh. Year		Veh. Make		Veh. Model		Veh. Style		Veh. Color		Veh. Value		Vin. or Incident			
2002		Ford		Escape		XLT		White				☐ YES ☐ NO			
RECOVERY INFORMATION															
Recv Date		St/ Loc / Recv Loc		Recv Value		# Veh. Recv		Recovered Damage		Condition					
Recovered Location												Recv City		Recv State	
												Savannah		GA	
Towing Company						Towed From				Towed To					
Person Notified						Date Notified		Time Notified		Notified By					
Released To						Date Released		Time Released		Released By					
Address						City		State		Zip		Phone Number			
												Ph Type			
PROPERTY															
Involvement		Category		Article				Brand		# Pieces		Value			
Make (Gun Only)		Model		Serial Number				Owner #		Drug Type		Quantity			
												Measure			
Finish		Caliber		Barrel Length		RECV Date		RECV Value		Damage		Officer			
												Involve. #			
Involvement		Category		Article				Brand		# Pieces		Value			
Make (Gun Only)		Model		Serial Number				Owner #		Drug Type		Quantity			
												Measure			
Finish		Caliber		Barrel Length		RECV Date		RECV Value		Damage		Officer			
												Involve. #			
Involvement		Category		Article				Brand		# Pieces		Value			
Make (Gun Only)		Model		Serial Number				Owner #		Drug Type		Quantity			
												Measure			
Finish		Caliber		Barrel Length		RECV Date		RECV Value		Damage		Officer			
												Involve. #			
Involvement		Category		Article				Brand		# Pieces		Value			
Make (Gun Only)		Model		Serial Number				Owner #		Drug Type		Quantity			
												Measure			
Finish		Caliber		Barrel Length		RECV Date		RECV Value		Damage		Officer			
												Involve. #			
Involvement		Category		Article				Brand		# Pieces		Value			
Make (Gun Only)		Model		Serial Number				Owner #		Drug Type		Quantity			
												Measure			
Finish		Caliber		Barrel Length		RECV Date		RECV Value		Damage		Officer			
												Involve. #			
Involvement		Category		Article				Brand		# Pieces		Value			
Make (Gun Only)		Model		Serial Number				Owner #		Drug Type		Quantity			
												Measure			
Finish		Caliber		Barrel Length		RECV Date		RECV Value		Damage		Officer			
												Involve. #			
Date and Time Completed		Supporting Officer						PRN		Supporting Officer		PRN			
SUBMITTED BY		PRN						SUPERVISOR		PRN					
D.M. Rabron		00131													



MID-STATE INVESTIGATIONS

**PO Box 1323
Jackson, Georgia 30233
770-480-7527**

**To: GEICO DIRECT
One GEICO Center
Macon, Georgia 31295**

Attn.: John Payne

Date: July 1, 2005

MSI#: 200506027

CLAIM#: [REDACTED]

INSURED: [REDACTED]

VEHICLE: 2002 Ford *Escape*

VIN: 1FMYU03192K [REDACTED]

DATE OF LOSS: 04/08/05

BACKGROUND:

The 2002 Ford *Escape* allegedly caught fire and burned while being operated by the insured. No mechanical problems were indicated by the insured prior to the fire. This vehicle was included in a nation wide recall.

OBJECTIVE:

The objectives were to examine the burned vehicle, determine the origin and cause of the fire, as well as the condition of the vehicle prior to the fire. If necessary, fire debris and other items relating to the investigation will be removed to aid in pinpointing the cause of the fire.

As a result of the work performed, several opinions and conclusions have been reached. The contents of this report are based on information available as of this date. It is conceivable that additional information may be forthcoming which bears on our opinions and conclusions. The right is therefore reserved to revise the contents of this report should in fact additional information become available.

DATE INSPECTED: June 27, 2005

LOCATION: [REDACTED], Savannah, Georgia

Instructions Received:

On June 17, 2005, I was contacted by John Payne, Fire and Theft Adjuster, with the GEICO Direct Insurance Company, requesting a vehicle fire and salvage inspection to determine its origin and cause.

On June 27, 2005, I arrived at [REDACTED] in Savannah, Georgia, where I found the 2002 Ford *Escape* secured within their lot. After gaining entry into the lot, I conducted an in-depth fire scene examination of the vehicle. Documentation and photographs were recovered from the fire scene. My findings will be included in this report.

In the Investigator's Notes section of this report, you will find a vehicle inventory list which was completed prior to the in-depth fire scene examination. This systematic approach aids the Investigator in determining the area of origin, cause of the fire, and the vehicle's condition prior to the fire.

INSPECTION SUMMARY

EXTERIOR EXAMINATION:

The exterior of the vehicle displayed heavy fire damage to the engine compartment and front passenger area. Upon my first observation and in a clockwise rotation, I examined the vehicle. My findings are as follows:

Vehicle front: Heavy fire damage. The headlight assembly, grill, and bumper cover consumed. Windshield compromised with lower frame flame contact. The V.I.N plate located. No obvious signs of forced entry to engine compartment by fire suppression crews (*see photo's #1 & #2*).

Vehicle right (passenger side): Factory wheels and tires were attached. All passenger door's were closed during the fire. All door windows were closed. Fire damage present with burn patterns from front to rear. The front tire was consumed during the fire (*see photo's #3 & #4*).

Vehicle rear: The cargo door and window was closed during the fire. No fire damage present (*see photo #5*).

Vehicle left (driver side): Factory wheels and tires were attached with front tire involvement. Both door's and windows were closed during the fire (*see photo #6*). The gas cap was in place.

ENGINE COMPARTMENT:

Forced entry was necessary to gain access to the engine compartment (*see photo's #7 & #8*). The hood was down and latched at the inception of the fire. Fire damage in this area is extreme. It is obvious that the fire originated within this compartment.

The mechanical system was evaluated to determine its pre-fire condition. All mechanical components of the 3.0 liter, 6 cylinder engine were present. All belts, hoses, and lightly constructed plastic and alloy housings were consumed by direct flame and radiated heat contact. The fluid levels were found to be adequate for normal operating conditions (*see photo #9*).

The vehicle's electrical system was examined. The battery remains were present. All electrical connections and cables were in place prior to the fire (*see photo #10*). The harness was traced throughout the engine compartment. No electrical shorts or wire beading were discovered on the main wiring nor on identifiable electrical components and conductors. The ground straps to various components were examined and appeared to be securely fastened. The main power management panel was consumed during the fire. There was no evidence of electrical shorting or arcing discovered during this examination. The electrical system was not a contributing factor in the ignition of this fire and was ruled out as a possible fire cause.

All components of the main fuel delivery system were present but severely damaged by fire. The ram air intake and air cleaner housing were consumed. The throttle body and related fittings and connectors displayed signs of heavy fire and heat damage (*see photo #11*). The fuel rail and braided fuel lines were examined. The fuel connectors, clamps, and o-ring assemblies were found to be displaced but mostly consumed. Remaining rubber hoses in this area displayed surface burns (*see photo #12*). Burn pattern discovery on the surface of the intake and valve covers indicated fire flow from center to front (*see photo's #13 - #17*). It appears that this burn pattern originated near the fuel delivery system. Close inspection of the areas, within the fire flow, was indicative of a flammable substance contact burn. The alloy constructed valve cover displayed the best notable signs of this damage (*see photo #18*). Burn patterns were traced across the intake and valve covers to the exhaust manifold. This was determined to be the probable ignition source. It was apparent that fuel from the fuel delivery system came in contact with the exhaust manifold which ignited the plastic and rubber components in this area (*see photo #19*). Burning extended to frame level where the fuel also came in contact with the fan shroud and radiator. Damage in this area also supports these findings (*see photo's #20 - #22*). Further inspection of the undercarriage area also reveals the presence of flammable liquid contact burns on the bottom of the core support (*see photo's #23 & #24*). The hood panel also displayed flame contact in the area above the origin of the fire (*see photo #25*).

INTERIOR EXAMINATION:

Forced entry was not necessary to gain access to the passenger compartment. A moderate amount of fire damage was discovered along the dash with radiated heat damage was present on the seat surfaces. Inspection of this area revealed that fire entered the passenger compartment through wire chase openings, the steering column pathway, and through the windshield as it was consumed (*see photo's #26 & #30*).

The wiring harness was examined along the firewall and dash area. Damage to the harness was minimal. The harness was found to be fully intact and indicated no signs of arching or beading. The fuse assembly was moderately damaged. The interior firewall displayed no signs of abnormal burn patterns. The fire did not extend beyond the front passenger seating area.

The rear seating and cargo area displayed moderate radiated surface burns (*see photo #31*). These areas were eliminated as the area of origin of the fire. It was evident that the fire entered the passenger area through the firewall and by penetrating the windshield.

FIRE EXAMINATION CONCLUSION***ORIGIN AND FIRE SPREAD***

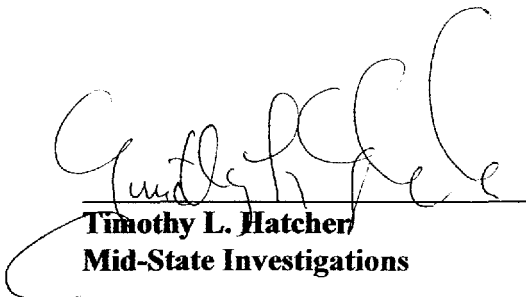
Burn patterns indicated that the fire originated in the engine compartment. The heavy deep charring and oxidation patterns found in this area, indicated that the area of origin was near the front right quadrant of the engine compartment. This area contained the fuel lines, exhaust manifold, portions of the valve cover, and other related components and devices. Examination of remaining rubber and plastic fuel components indicated that a flammable liquid had ignited in this area. It appeared to be from a possible leak within the fuel delivery system or its related components.

Burn patterns in this area suggests that the fuel source delivered a flammable concentration of gasoline which came in contact with the super heated exhaust manifold and ignited. Flame development did result in the ignition and the burning of all of the components that the fuel came in contact with then spread through the compartment. The fire entered the passenger area through the firewall openings and windshield.

FIRE CAUSATION:

The cause of the fire is ***accidental***. The opinion as to the fire cause is based on the following:

- 1) Fire flow, burn, and char patterns on the firewall, hood panel, valve cover, and intake manifold, indicating the fire's development at the location of the engine compartment .
- 2) Discovery of burn patterns along the intake, valve covers, radiator, and core support.
- 3) Incident statements reported by the insured.
- 4) Burn patterns indicating a possible leak within the fuel delivery system and its relation to a heat source.



Timothy L. Hatcher

Mid-State Investigations

PHOTOGRAPHS

NAME: [REDACTED]

CLAIM#: [REDACTED]

MSI#: [REDACTED]

PHOTO LOG

PHOTO 1: VEHICLE FRONT
PHOTO 2: V.I.N.
PHOTO 3: VEHICLE RIGHT - PASSENGER SIDE
PHOTO 4: FRONT RIGHT TIRE
PHOTO 5: VEHICLE REAR
PHOTO 6: VEHICLE LEFT - DRIVER SIDE
PHOTO 7: ENGINE COMPARTMENT
PHOTO 8: MECHANICAL SYSTEM
PHOTO 9: FLUID LEVELS
PHOTO 10: BATTERY - CABLES - CONNECTIONS
PHOTO 11: FUEL DELIVERY SYSTEM AND RELATED COMPONENTS
PHOTO 12: SURFACE DAMAGED HOSES AND CONNECTIONS
PHOTO 13: FIRE DAMAGE ACROSS INTAKE
PHOTO 14: BURN PATTERN ACROSS INTAKE TO VALVE COVER
PHOTO 15: BURN PATTERN ACROSS VALVE COVER
PHOTO 16: BURN PATTERN OVERVIEW
PHOTO 17: CLOSE UP OF BURN PATTERN
PHOTO 18: CLOSE UP OF VALVE COVER WITH BURN PATTERN
PHOTO 19: BURN PATTERN ALONG INTERIOR FENDER PANEL
PHOTO 20: BURN PATTERNS FROM RIGHT SIDE
PHOTO 21: BURN PATTERN FROM RADIATOR
PHOTO 22: BURN PATTERN ALONG RADIATOR FRONT
PHOTO 23: UNDERCARRIAGE
PHOTO 24: UNDERCARRIAGE - CORE SUPPORT BURN PATTERN
PHOTO 25: HOOD - BURN DAMAGE ABOVE AREA OF ORIGIN
PHOTO 26: INTERIOR PASSENGER COMPARTMENT
PHOTO 27: FIRE ENTRY POINT FROM ENGINE COMPARTMENT TO DASH
PHOTO 28: ENTRY POINT FROM FIREWALL
PHOTO 29: BURN DAMAGE - INTERIOR DASH
PHOTO 30: WINDSHIELD CONSUMPTION ALONG DASH
PHOTO 31: REAR PASSENGER AND CARGO AREA

NAME:



CLAIM#:



MSI#:



PHOTO #1: VEHICLE FRONT



PHOTO #2: V.I.N.

NAME:

CLAIM#:

MSI#



PHOTO #3: VEHICLE RIGHT - PASSENGER SIDE



PHOTO #4: FRONT RIGHT TIRE

NAME:

CLAIM#:

MSI#:



PHOTO #5: VEHICLE REAR



PHOTO #6: VEHICLE LEFT - DRIVER SIDE

NAME: [REDACTED]

CLAIM#: [REDACTED]

MSI#: [REDACTED]

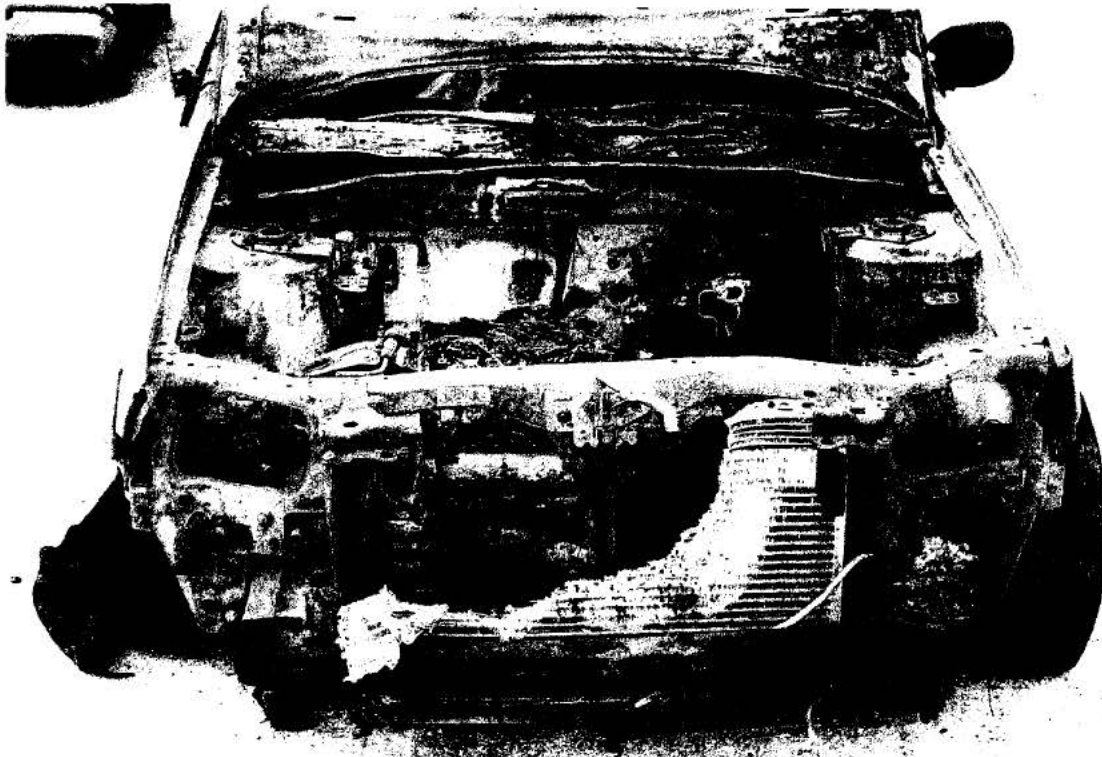


PHOTO #7: ENGINE COMPARTMENT

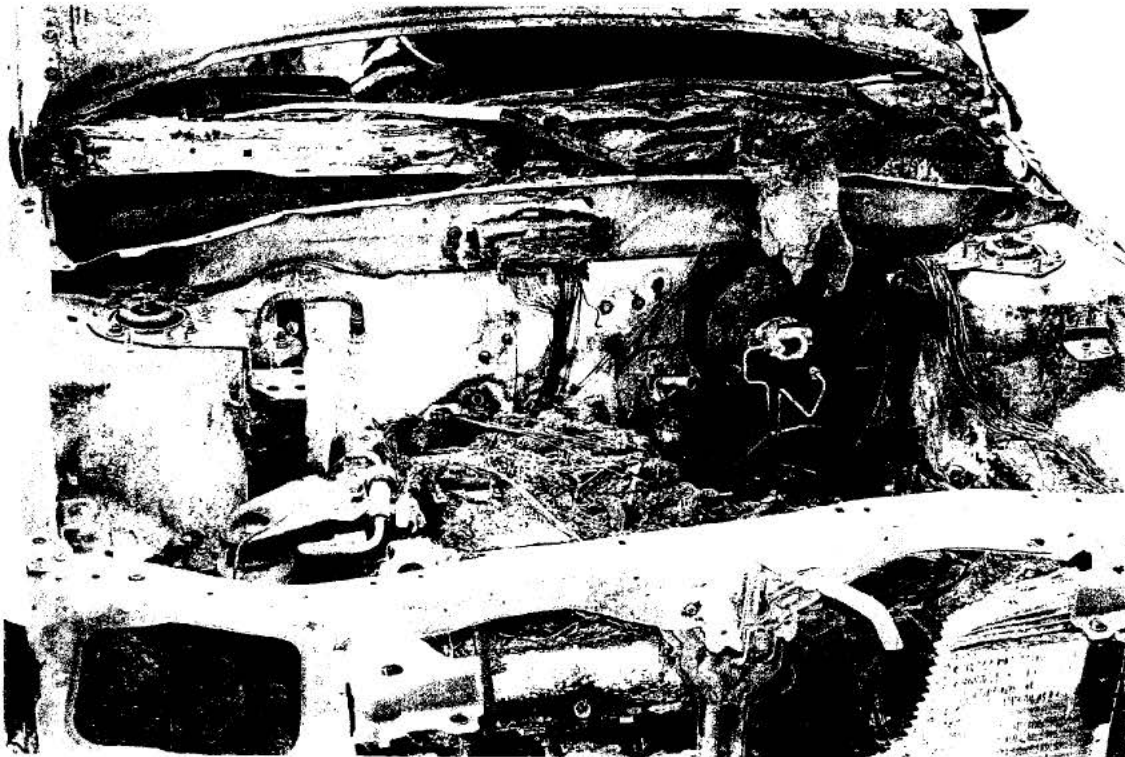


PHOTO #8: MECHANICAL SYSTEM

NAME: [REDACTED]

CLAIM#: [REDACTED]

MSI#: [REDACTED]



PHOTO #9: FLUID LEVELS



PHOTO #10: BATTERY - CABLES - CONNECTORS

NAME: [REDACTED]

CLAIM#: [REDACTED]

MSI#: [REDACTED]

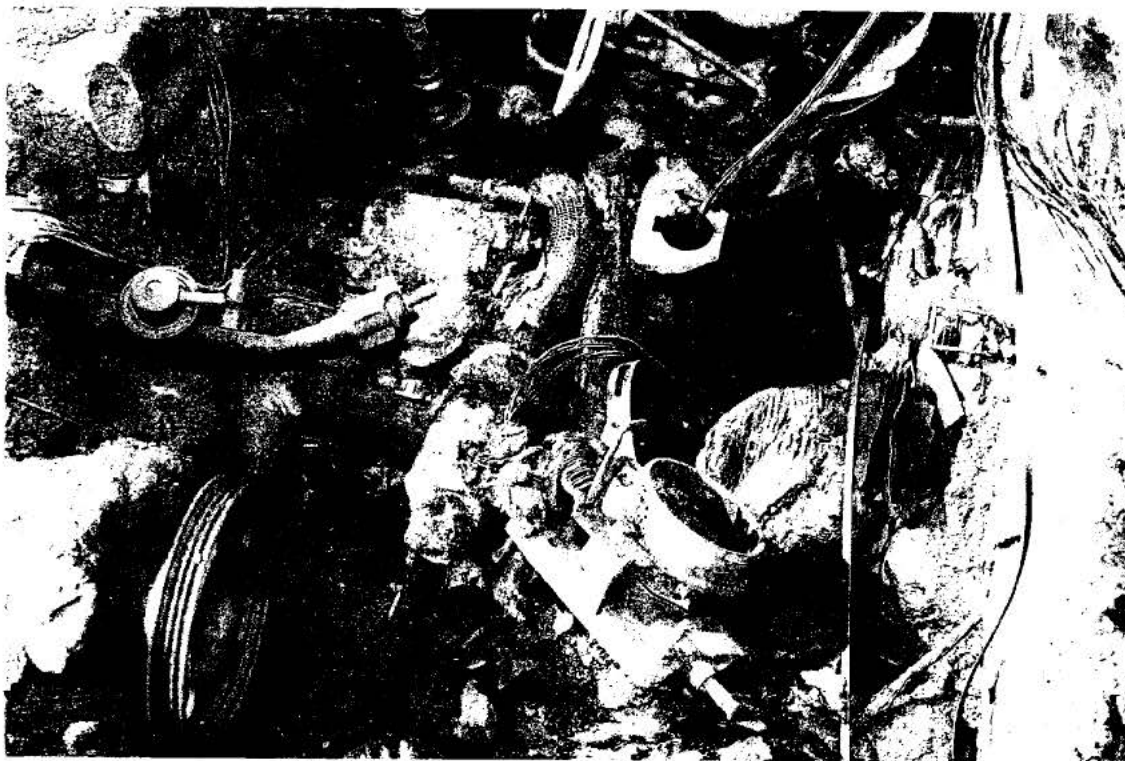


PHOTO #11: FUEL DELIVERY SYSTEM AND RELATED COMPONENTS



PHOTO #12: SURFACE DAMAGED HOSES AND CONNECTIONS

NAME: [REDACTED]

CLAIM#: [REDACTED]

MSI#: [REDACTED]



PHOTO #13: FIRE DAMAGE ACROSS INTAKE MANIFOLD

NAME: [REDACTED]

CLAIM#: [REDACTED]

MSI#: [REDACTED]



PHOTO #14: BURN PATTERN ACROSS INTAKE TO VALVE COVER



PHOTO #15: BURN PATTERN ACROSS VALVE COVER

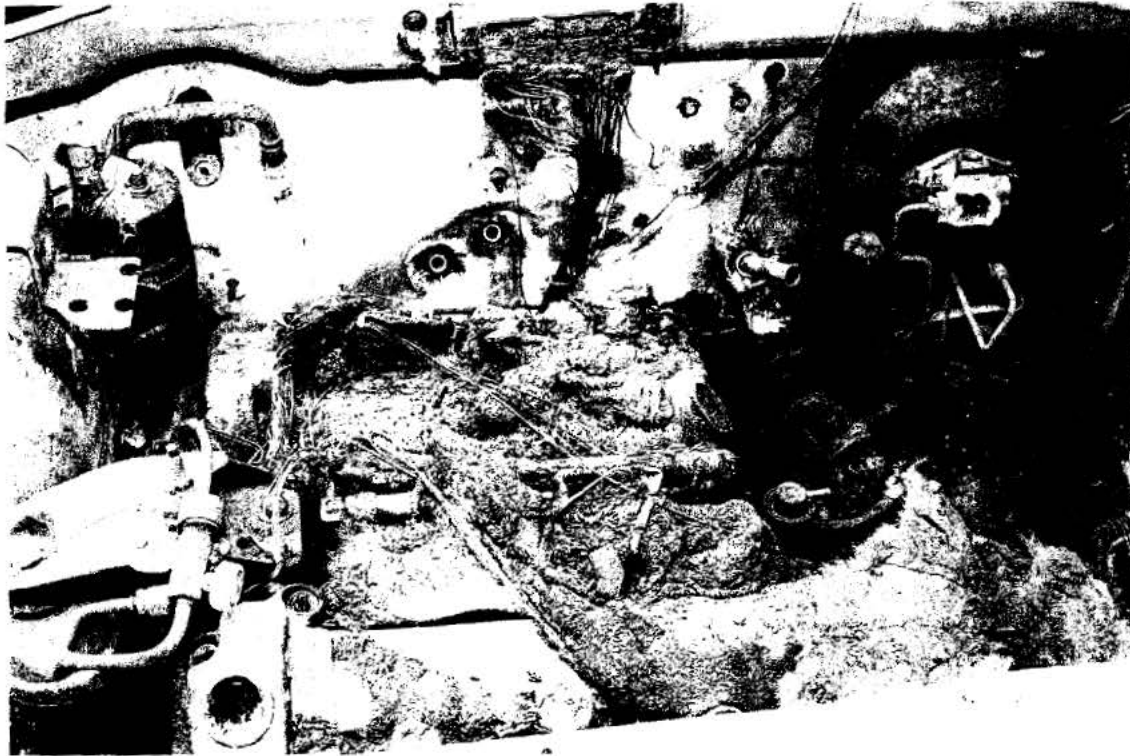


PHOTO #16: BURN PATTERN OVERVIEW

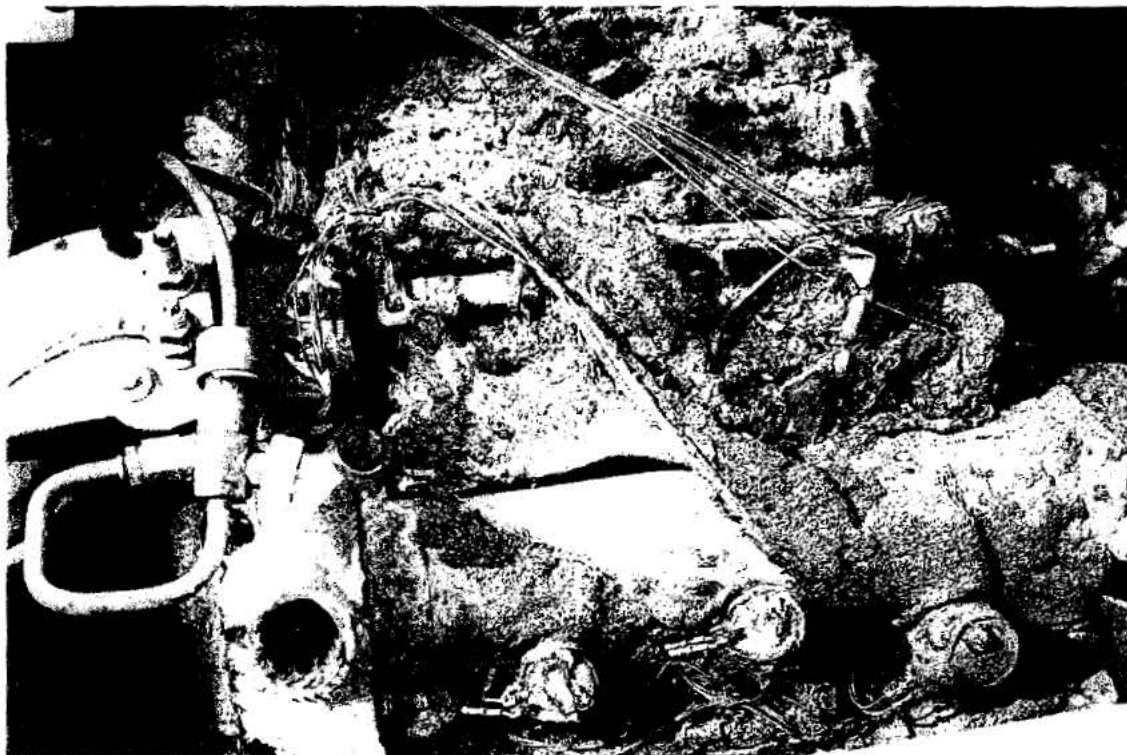


PHOTO #17: CLOSE UP OF BURN PATTERN

NAME: [REDACTED]

CLAIM#: [REDACTED]

MSI#: [REDACTED]

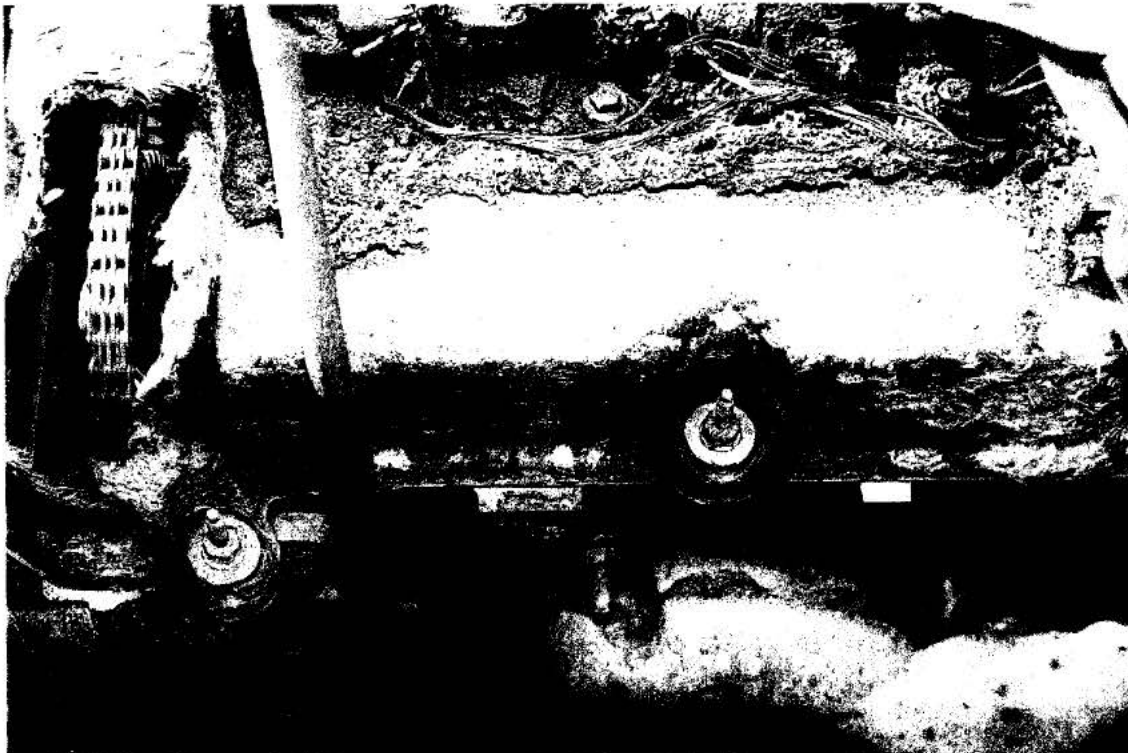


PHOTO #18: CLOSE UP OF VALVE COVER WITH BURN PATTERNS



PHOTO #19: BURN PATTERN ALONG INTERIOR FENDER PANEL

NAME: [REDACTED]

CLAIM#: [REDACTED]

MSI#: [REDACTED]

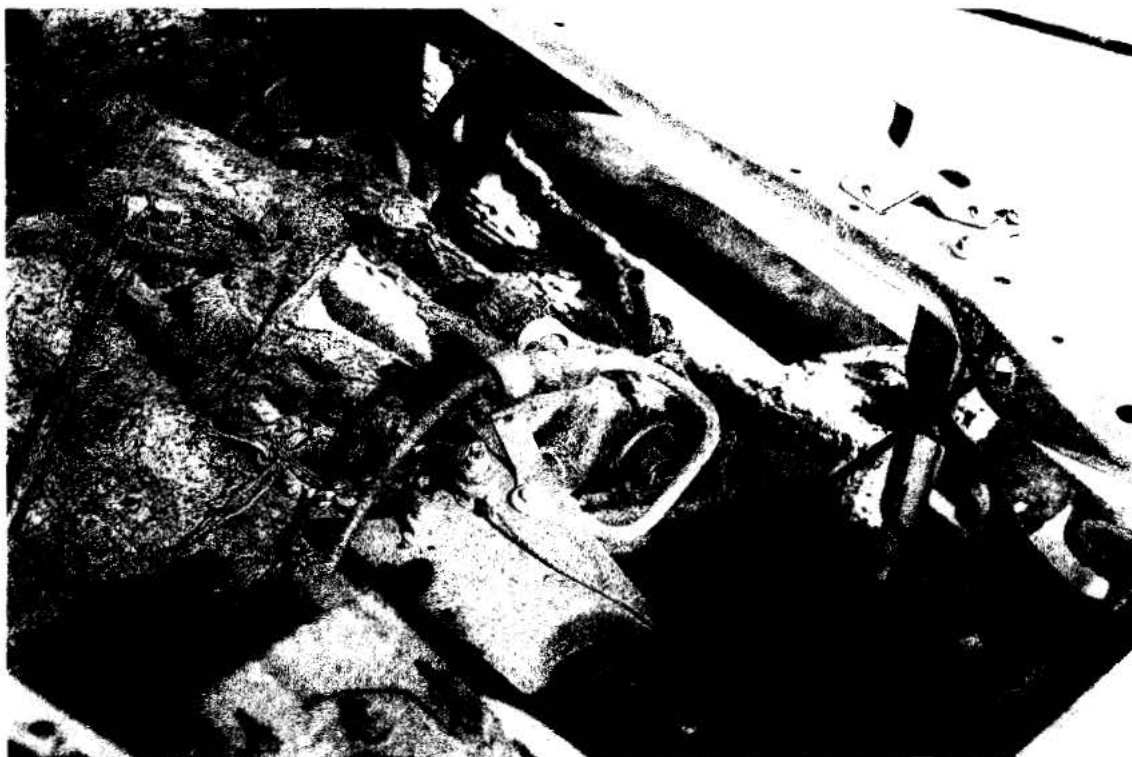


PHOTO #20: BURN PATTERNS FROM RIGHT SIDE

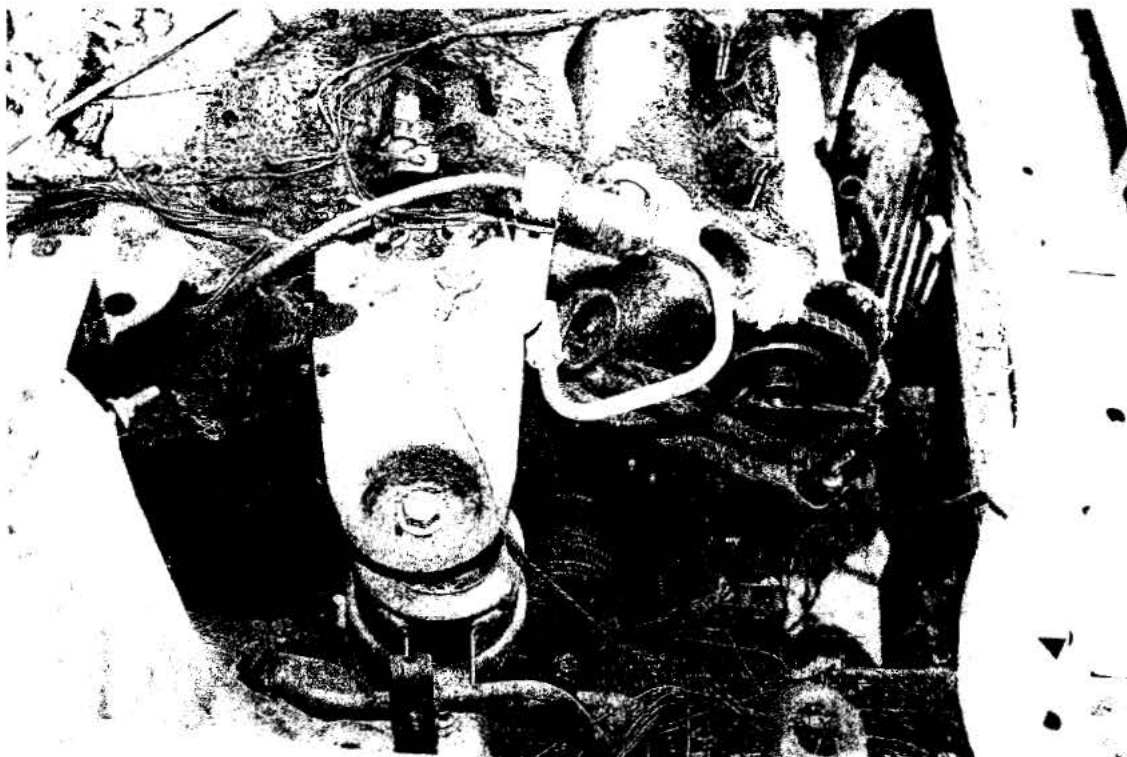


PHOTO #21: BURN PATTERNS FROM RADIATOR

NAME: [REDACTED]

CLAIM#: [REDACTED]

MSI#: [REDACTED]

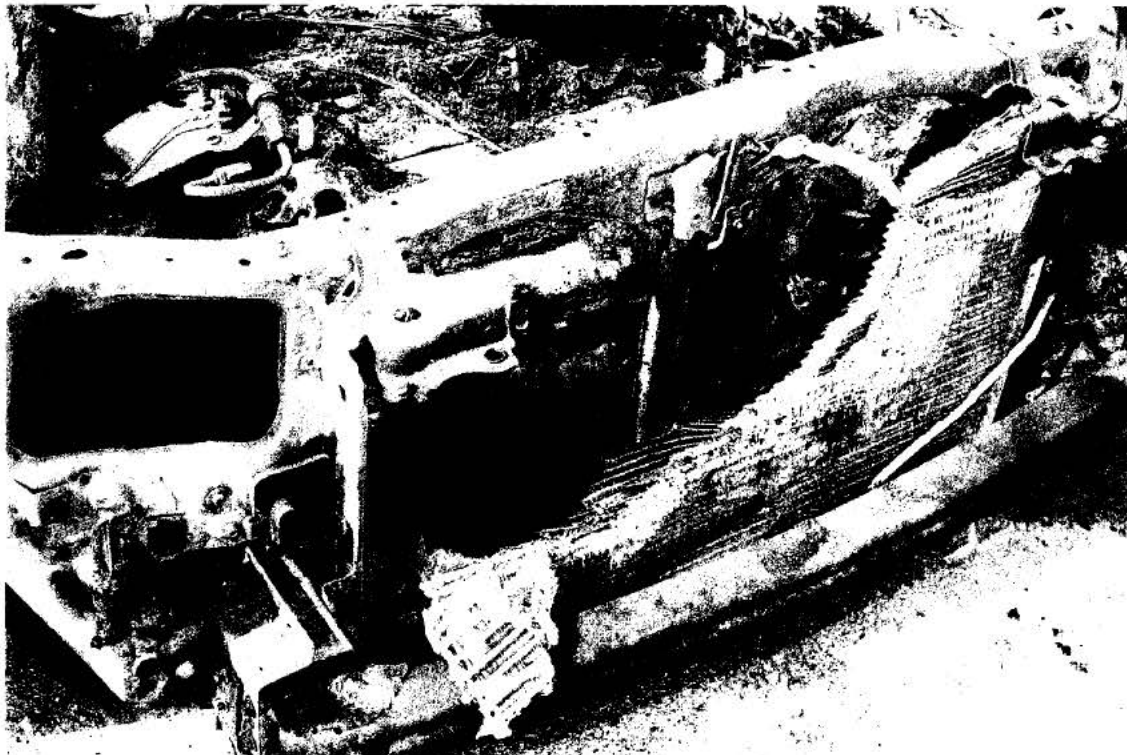


PHOTO #22: BURN PATTERN ALONG RADIATOR FRONT

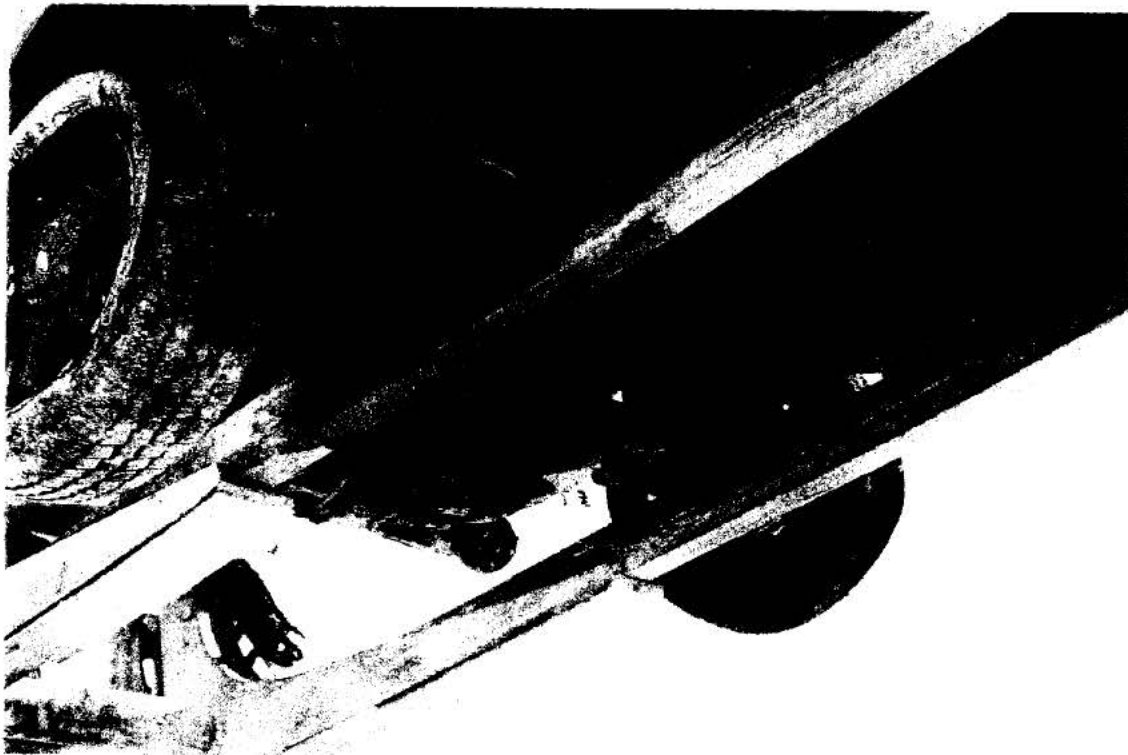


PHOTO #23: UNDERCARRIAGE

NAME: [REDACTED]

CLAIM#: [REDACTED]

MSI#: [REDACTED]



PHOTO #24: UNDERCARRIAGE - CORE SUPPORT BURN PATTERN

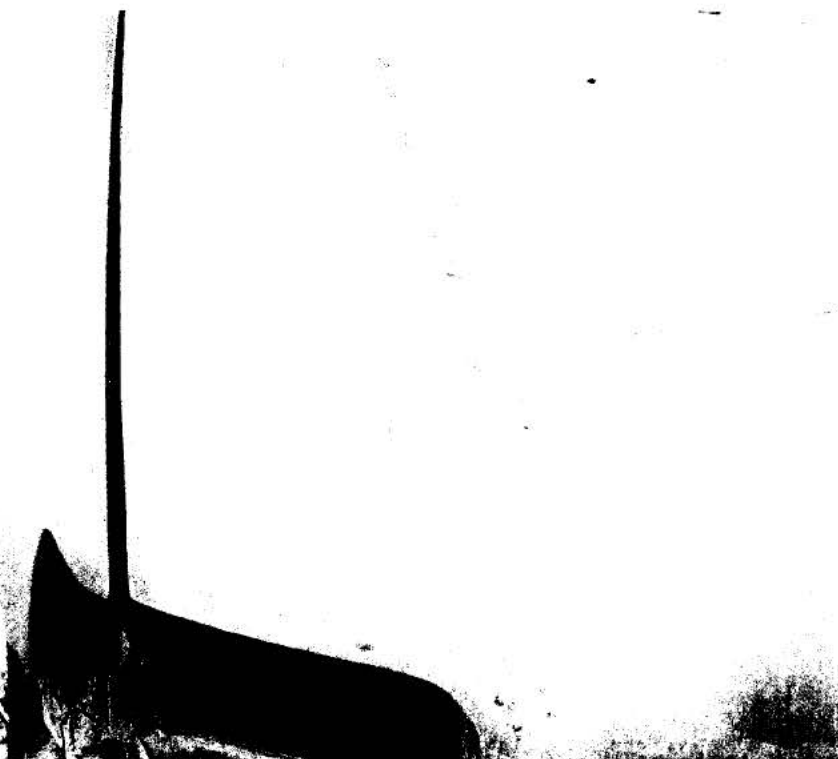


PHOTO #25: HOOD - BURN DAMAGE ABOVE AREA OF ORIGIN

NAME: [REDACTED]

CLAIM#: [REDACTED]

MSI#: [REDACTED]



PHOTO #26: INTERIOR PASSENGER COMPARTMENT



PHOTO #27: FIRE ENTRY POINT FROM ENGINE COMPARTMENT TO DASH

NAME: [REDACTED]

CLAIM#: [REDACTED]

MSI#: [REDACTED]



PHOTO #28: ENTRY POINT FROM FIREWALL



PHOTO #29: BURN DAMAGE TO INTERIOR DASH

NAME: [REDACTED]

CLAIM#: [REDACTED]

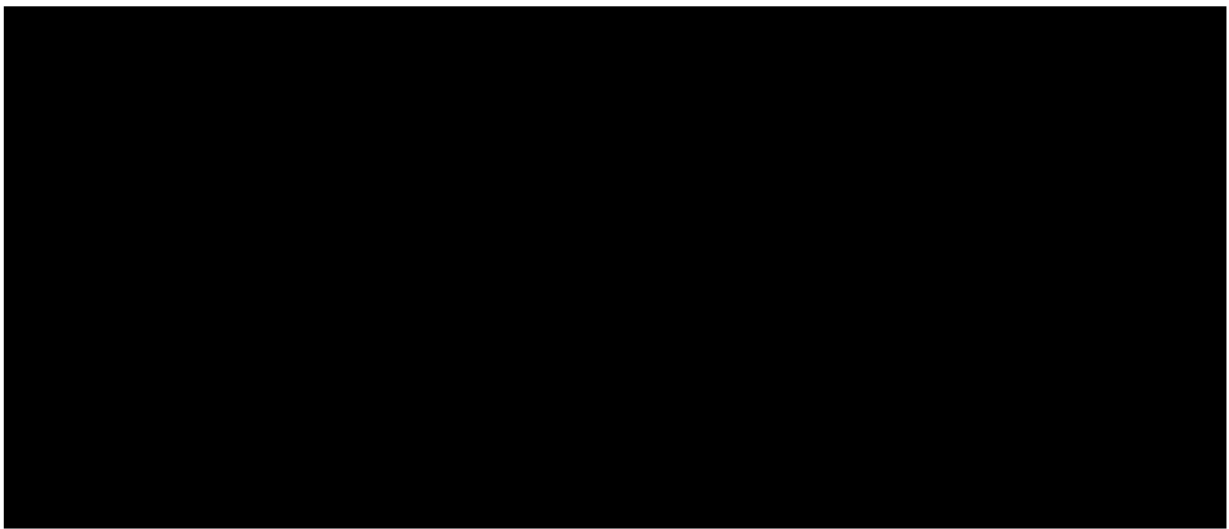
MSI#: [REDACTED]



PHOTO #30: WINDSHIELD CONSUMPTION ALONG DASH



PHOTO #31: REAR PASSENGER AND CARGO AREA





SAFECO PROPERTY & CASUALTY INSURANCE COMPANIES

Safeco Insurance Company of Indiana
Recovery Management
PO BOX 461
ST. LOUIS, MO 63166-9970

Phone: (800) 332-3226
Fax: (888) 268-8840

www.safeco.com

Mailing address:
PO BOX 461
ST. LOUIS, MO 63166-9970

June 26, 2006

Ford Motor Company
Attn: Shawn Norton Claims Department
Po Box 70
Dearborn, MI 48121

Insured Name: [REDACTED]
Policy Number: [REDACTED]
Loss Date: May 7, 2006
Claim Number: [REDACTED]

To Whom It May Concern:

Our insured has made a claim for damages to her property. Our investigation to date indicates the cause of these damages may be attributed to your negligence.

Please note this is a companion claim to [REDACTED] date of loss 5-7-06. Vehicle involved is a 2003 Ford Escape XLT. Claim [REDACTED] is a claim for the vehicle loss. Claim [REDACTED] is a claim for the garage and contents loss.

Most of the requested information is going to be given you by the vehicle claim. Our damages are still open and once the damages are complete, I will submit the supports along with photos to you.

Once we have made payment to our insured, we have the legal right of recovery to the extent of our payment; thus, we may be looking to you for reimbursement.

Before making a final liability decision, we want to complete our investigation. Please contact Cheryl Steppig at 800-332-3226 ext 483122 within the next ten days so that she may discuss this loss with you.

Sincerely,

Recovery Management
Safeco Insurance Company of Indiana
(800) 332-3226 Fax: (888) 268-8840



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FIRE INVESTIGATION

Report One and Final

INSURED: [REDACTED]
LOSS LOCATION: [REDACTED]
DATE OF LOSS: Elmwood Park, Illinois
CLAIM NO: May 7, 2006
EFI File NO: [REDACTED]

Report Date: May 23, 2006

Prepared For: SAFECO
500 N. Meridian
Indianapolis, IN 46204

Attention: Reggie Butcher

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

Insured: [REDACTED]

May 23, 2006

ASSIGNMENT

The assignment was received on May 12, 2006 with instructions to conduct an origin and cause investigation. Present during the scene examination were several employees of the Illinois State Police Department and [REDACTED]

The investigation was initiated on May 16, 2006 and completed on May 23, 2006.

The vehicle was located at the CO-PART, located at 89 E. Sauk Trail, Chicago Heights Illinois. The area is secured and all persons entering the compound remain outside of the security area until the vehicle is brought at to an inspection area. This vehicle was brought into a secured garage for the inspection.

ENCLOSURES

1. Vehicle fire examination sheet
2. 13 Color photographs
3. Photographic identification sheet
4. All photographic negatives
5. Vehicle Inspection Sheet
6. Re-call on 2003 Ford Escape

Neither EFL nor I retain possession of any film photographs, negatives or videos.

VEHICLE DESCRIPTION

The vehicle was a silver 2003, Ford, Escape. The vehicle identification number is 1FMCU93123K [REDACTED]. The odometer reading could not be obtained due to the fire damage to the battery. There were no license plates on the vehicle at the time of my examination.

Alterations to the vehicle include salvage and overhaul procedures conducted by the Fire Department. The above alterations did not prevent an accurate determination of origin or cause.

VEHICLE SECURITY

The vehicle was reportedly not occupied at the time of the fire.

Insured: [REDACTED]

May 23, 2006

INVESTIGATION

The following information was received on May 12, 2006

1. Reggie Butcher
Claims Representative
SAFECO Insurance Company

Mr. Butcher relayed that on May 7, 2006 a fire occurred in the vehicle owned and insured by [REDACTED]. The file information was relayed and an origin and cause investigation was requested. He further advised me that the vehicle was parked in a garage at the time of the fire. I also requested that an exemplar vehicle be examined and photographed. This was completed on May 23, 2006

EVIDENCE

The vehicle was left as found and covered in plastic wrap. A plastic bag was used to pick up all of the debris that fell onto the floor.

DETERMINATION OF CAUSE AND ORIGIN

The first fire is accidental.

The fire originated in the driver's rear quadrant of the engine compartment. The fire spread throughout the engine compartment and vented out of the front of the vehicle and up through the vent along the windshield. As the windshield failed the fire entered the vehicle melting the dashboard and headliner. The exact cause of the fire cannot be determined until an examination by a qualified engineer examines the vehicle.

COMMENTS

Per your instructions at the conclusion of my verbal report, this file will be placed in a closed status with the understanding it can be reopened at your request.

Richard Besse
Richard Besse
Investigator
Missouri Service Center
204-623-8898

Blac

in

Aded

Reviewed by

[Signature]

Date: June

CONSIDERATIONS:

1. Personal Information

- Name, [REDACTED]
- address, [REDACTED] ELMWOOD PARK II [REDACTED]
- phone number(s) [REDACTED] DAY# [REDACTED] EXT [REDACTED]
- Marital status (how long / recent changes) WIDOWED
- Number, names and ages of dependents
- Date of birth [REDACTED]
- Social Security Number [REDACTED]
- Driver's License Number IL – [REDACTED] LISC – RESTRICTIONS?

GLASSES

- Occupation? RN
- Current employment status – CURRENTLY EMPLOYED – ELMWOOD PARK COMMUNITY SCHOOL DISTRICT 401
 - What is work shift, job description, how long employed? 20 YEARS
 - Unemployed due to medical problems, what problems, when off, when return to work
 - If laid off when, why, when are you expected to return to work
 - If terminated when, why, from what company
- Current or previous claims
 - Do you have any insurance claims currently pending? NO OTHER HOUSE CLAIM – RELATED TO THIS CLAIM
 - Do you have any previous claims w/ Safeco? NO, NOT TO MY KNOWLEDGE
- HOW LONG HAVE YOU BEEN A SAFECO CUSTOMER? 6-7 YEARS
- Previous insurance carrier? STATE FARM
- Who was your previous carrier? Why did you leave them? WHEN I BECAME A WIDOW, THE INSURANCE WAS IN MY NAME AND HUSBAND, THEY NEVER NOTIFIED ME THAT ALL THE POLICIES WERE CANCELLED – A FRIEND THAT WAS A STATE FARM AGENT NOTIFIED ME THAT MY POLICIES WERE CANCELLED.
- Do you have any claim w/ the previous carrier? YES What type? AUTO – ACCIDENT – W/ 3 TEENS DRIVING Settled? What paid?
- Other insurance on the / other vehicle(s)
- All other automobiles owned (including dates of purchase) JUST ONE

2. Automobile information

- Vehicle description 2003 FORD ESCAPE SUV – COLOR - RED
 - Year, make, model, color
 - VIN – N/A

- Current registration # IL – IN MY NAME
- Who is the vehicle registered and titled too? ME
- Options on vehicle – NO SPECIAL OPTIONS – WAS THE XLT MODEL – DVD PLAYER AND SUNROOF THAT COME STANDARD WITH TOP MODEL
- Distinguishing characteristics
- Lien
 - Current lien holder-name and address? NO I OWNED IT OUTRIGHT
 - Monthly payments
 - Payment current?
 - When was last payment?
 - Amount still owed?
- All entities with proprietary interest in the vehicle (what interest?)
- Date of vehicle purchased? JULY OR AUGUST OF 2003 – I HAVE THE TITLE OF THE VEHICLE.
- Previous owner of vehicle? PURCHASED NEW
- Registered owner at time of purchase (any changes?)
- Mileage at time of purchase? DON'T KNOW
- Amount paid for vehicle? 19 – 20K
- Method of financing (including other vehicles traded in and value received for trade-in) – VEHICLE IS PAID FOR – PAID CASH
- Amount financed
- Lease information (miles per year without penalty, residual value)
- Permissive drivers other than insured ? NOT REALLY IF ONE OF MY CHILDREN NEED TO MOVE SOMETHING BUT I'M THE PRIMARY DRIVER
- Maintenance record (Warranty Manual) ? I HAD BRAKES AND A CHECK DONE IN JANUARY AT THE DEALERSHIP DUE TO RECALL – I HAVE THE PAPERWORK FROM WORK DONE, SOMETHING TO DO WITH ACCELERATOIN
- Repair facility / dealer utilized? ALTAMONTE FORD IN MELROSE PARK IL
- Repairs performed (when? cost?) JANUARY
- Mileage on the vehicle when stolen/burned.? A LITTLE OVER 30K
- Recall information from the factory (obtain recall repair invoice where appropriate)
- Mileage at the time of loss? 30 MI
- Mechanical problems with the vehicle? NO I REALLY LIKE THE CAR
 - What
 - When
 - Was it repaired
 - By whom?
- Has the vehicle been for sale?NO
 - For how long?
 - Why?

- Price?
- Where was it advertised?
- Why did it not sell?
-
- Personal items kept in the vehicle? YEAH – GOOFY THING HEALTH CLUB ID, FLASHLIGHT, AND STARBUCKS AND CARABUE COFFEE CARDS, PLASTIC FOR CHANGE, COUPLE PICTURES, UMBRELLA, A MAP, JACKET AND BLANKET, CLIP ON SUNGLASSES (use of item and length of time in vehicle)
- Any photos of the vehicle? (obtain as appropriate) NO
- Primary use of the vehicle (was it for business?) BACK AND FORTH TO WORK

3. Fire information

- Theories as to why one would burn your vehicle?NO
- Know anybody you believe would burn your car?NO
- Have you had any run-ins with any individuals / groups?NO, YELLING AT LITTLE KIDS ABOUT KID, NOTHING SERIOUS – GRAMMER SCHOOL CHILDREN
- Location of any / all liquids in your vehicle. A BOTTLE OF WATER
- Any flammable liquids? (if so, what / quantities and why?)NO
- Type of container holding liquids
- Witnesses to vehicle fire (including owner / driver)? MY NEXT DOOR NEIGHBOR WAS THE PERSON WHO CALLED 911 AND I ALSO DID A 911 CALL
- Was the vehicle running when fire started? NO, IT WASN'T IT WAS LOCKED IN MY GARAGE, WHICH IS WHY THIS IS SO STRANGE.

HOW LONG WAS YOUR VEHICLE PARKED? ABOUT 2PM SATURDAY AFTERNOON

- Who driving at time of fire?NO
- Any injuries?NO
- Smoke / unusual odors noticed prior to seeing flame?NOT FROM THE CAR OR ANYTHING, DEFINITELY WHEN I OPENED MY GARAGE, NOTHING WARRANTED ME FROM THE CAR.
- Part of the vehicle where fire / smoke first noticed? IT WAS CLOSED IN GARAGE, WHAT HAPPEN WAS I RAN DOWN SIDE PART OF MY GARAGE AND WENT TO WHERE OVERHEAD STEEL DOOR, I COULD SEE THE ORANGE RED BENEATH THE DOOR, IT WAS PARKED IN THE MIDDLE OF THE GARAGE
- Describe the fire, color of smoke / flame? ORANGE GLOW
- Any persons stop to assist fire suppression (names / addresses) ELMWOOD PARK FIRE DEPT
- If vehicle was not being operated at time fo the fire, was it locked? (if so, by whom?)IT WAS LOCKED IN GARAGE
- Why was vehicle parked at that location? IN GARAGE AT RESIDENCE

Fire Report

Elmwood Park Fire Department

Address: [REDACTED] Elmwood Park, Illinois
Incident Date: 7 May 2006
Alarm Time: 0537 hours
Incident Number: [REDACTED]
Fire Type: Structure Fire (2 ½ car garage)
Vehicle fire inside garage

Reporting party: [REDACTED]

Property owner: [REDACTED]
Vehicle owner: [REDACTED]

Reporting Officer: Capt. Michael G. Collins

Narrative of Incident:

We responded to a call received from [REDACTED] on the date and time herein stated and found heavy smoke in the area of Sunset and 78th Avenues. 949 arrived and found the garage at the rear of this address to be puffing heavy black and brown smoke. I was able to get a close look inside the garage from the overhead door and could see flame in the engine compartment of the vehicle parked inside (2003 Ford Escape). I could also see that fire had extended to the overhead structural members of the building.

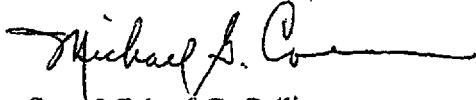
Engine 946 was ordered to drop a 1 ¾" attack line and secure the hydrant on the corner of [REDACTED]. Engine 947 arrived and helped advance the line to the rear of this property. 949 checked the rear of the building for exposures to garages in sector 3 on the opposite side of the alley and found the fire to be contained within just this one garage. There were no exposure problems to the residence or the garages on the opposite sides of the fire building. 947 and 946 attacked the fire from sector 1 (east side of the garage) after forcing entry. A good part of this fire was knocked in this initial attack.

River Grove engine and Norwood Park truck arrived and assisted in opening up the building. The overhead door facing the alley was removed by River Grove. A second line (3") was requested from 946 and this line was stretched to the alley behind the fire building. This line was originally placed as an exposure line but was not needed in that capacity. This line was then employed by Norwood Park to attack residual fire within the building.

The suppression of this fire went without incident and there were no injuries to civilians or firefighters. The vehicle in the garage was destroyed. The garage itself received considerable smoke, water, and fire damage. [REDACTED] was notified and secured a power shutoff to the building.

I appointed FF. J. Drozd as lead fire investigator. At the time of this report, the fire remains under investigation.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael G. Collins", with a long horizontal flourish extending to the right.

Capt. Michael G. Collins
Incident Commander

Cc: Chief M. Marino
Capt. M. Ventura
FF. J. Drozd

MABAS DIVISION 20 **REPORT OF INTERVIEW**

LOCATION: [REDACTED] Elmwood Park IL.

INVESTIGATOR: Sgt. Aichinger (Rosemont PD)

DATE: 05/07/2006

SUBJECT: Interview with building and vehicle owner E [REDACTED]

FAW DOB: [REDACTED]

Elmwood Park IL. [REDACTED]

Home: [REDACTED] **Cell:** [REDACTED]

On 05/07/2006 at approximately 0730 hours I interviewed [REDACTED] in her home. The following is a summary of that interview not verbatim.

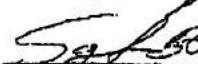
[REDACTED] told me she had gotten out of the shower this morning hearing her two dogs barking. [REDACTED] went to the front her home, looked out the window and saw nothing. [REDACTED] then went to the back of her home, looked out the window and saw smoke coming from her garage. [REDACTED] immediately called the Elmwood Park Fire Department to report the fire. [REDACTED] then spoke with her neighbor [REDACTED] who also called the fire department after seeing her garage on fire.

[REDACTED] has owned the home since 1979. [REDACTED] vehicle a 2003 Ford Escape was parked in the garage. [REDACTED] purchased the vehicle new from Al Piemonte Ford in Melrose Park IL. The vehicle has no lien against it. [REDACTED] parked the vehicle in the garage on 05/06/2006 at approximately 1400 hours. [REDACTED] has had the vehicle serviced regularly. [REDACTED] told me the vehicle had been recalled in January of 2006 for an accelerator cable problem, which was fixed by Al Piemonte Ford. [REDACTED] told me all the service records for the vehicle was in the glove compartment inside the owner's manual. The only other problem [REDACTED] is currently having with the vehicle is the CD player will not work. [REDACTED] told me the garage is always kept locked and that there is no form of alarm system on the garage.

Vehicle Insurance: Safe Co. Policy # [REDACTED]

Property Insurance: Safe Co. Policy [REDACTED]

Nothing further.


Sgt. J. Aichinger

Incident Rep.

ELMWOOD PARK FIRE DEPARTMENT

Incident Report

Page 1

Prepared: 5/23/06, 11:27:25

Program: [REDACTED]

=====

A	CN212 IL	5/07/06	Both Stations	[REDACTED]	NFIRS - 1
	FDID State	Incident date	Station		Basic

=====

B

No	[REDACTED]	Street address	Yes
Alternative location	Census tract	Location	Emergency

=====

[REDACTED] ELMWOOD PARK, IL, [REDACTED]
Address

=====

C Passenger vehicle fire
Incident type

=====

D (MA) Auto aid received
Aid given or received

=====

E1

	Date	Time	E2 RED SHIFT	NORTH OF TRACKS
Alarm	5/07/06	5:37:44	Shift	Alarms District
Arrival	5/07/06	5:42:21		
Controlled	0/00/00	0:00:00		
Last unit cleared	5/07/06	6:49:05		

=====

F Extinguish
Primary action taken (1)

=====

G1

Yes	Apparatus	Personnel	No	G2	Losses	Value
Apparatus/	Suppression	6	10	Resource counts	Property	0
personnel	BMS	1	2	include aid	Contents	0
form used	other	0	0	received resources		

=====

H1

Deaths	Injuries		H3 None
Fire service	0	0	Hazardous materials release
Civilian fire	0	0	

=====

I Not mixed use
Mixed use property

=====

K1

Name	Reporting party	[REDACTED]
[REDACTED]	Involvement type	Phone number
[REDACTED]		0/00/0000
Address	Gender	Age
	Birth date	Race

=====

M MICHAEL COLLINS
Officer in charge

Shift Commander	Shift Commander	5/07/06
Position or rank	Assignment	Date

=====

ELMWOOD PARK FIRE DEPARTMENT

Prepared: 5/23/06, 11:27:25

Program: [REDACTED]

Incident Report

Page 2

```
=====
A  CN212 IL          5/07/06    Both Stations    [REDACTED]    NFIRS - 2
   FDID State      Incident date Station          Incident number    Fire
=====
B1  Not residential      | C  None          None
   Estimated number of   |   On-site material 1   Material 1 storage use
   residential units     |
=====
B2  1
   Number of buildings involved
=====
B3  None
   Acres burned (outside fires)
=====
D1  Vehicle storage area; garage, carport      | E1 Cause under investigation
   Area of fire origin                         |   Cause of ignition
=====
D2  Heat from powered equipment, other         | E2 None
   Heat source                                |   Factor 1 contributing to ignition
=====
D3  Undetermined                                     | E3 None
   Item first ignited                           |   Human factors contributing to ignition
   No
   Spread confined to object of origin
=====
D4  Undetermined
   Type of material first ignited
=====
F1  None
   Equipment involved in ignition
   Brand
   Model
   Serial number
   0000
   Equipment year
=====
F2  Equipment power
=====
F3  Equipment portability
=====
G  None
   Fire suppression factor 1
=====
H1  Involved in ignition and burned
   Mobile property involved
=====
H2  Passenger car
   Mobile property type
   Ford
   Mobile property make
   ESCAPE
   Mobile property model
   2003 IL
   Year License plate State VIN
=====
```


ELMWOOD PARK FIRE DEPARTMENT

Prepared: 5/23/06, 11:27:25

Program: [REDACTED]

Incident Report

Page 3

=====

A	CN212 IL	5/07/06	Both Stations	[REDACTED]	NFIRS - 9/10
FDID	State	Incident date	Station	Incident number	Apparatus/Personnel

=====

B	Apparatus	Type	Personnel	Use	Action taken	Emergency
	EP-E	Engine	0	Suppression		Yes
		Dispatched	5/07/06	5:41:14		
		Enroute	5/07/06	5:43:08		
		At Scene	5/07/06	5:49:02		
		In Service	5/07/06	6:49:05		

=====

B	Apparatus	Type	Personnel	Use	Action taken	Emergency
	EP-T	Truck or aerial	0	Suppression		Yes
		Dispatched	5/07/06	5:41:14		
		Enroute	5/07/06	5:43:32		
		At Scene	5/07/06	5:45:59		
		In Service	5/07/06	6:49:05		

=====

B	Apparatus	Type	Personnel	Use	Action taken	Emergency
	943	ALS unit	2	EMS		Yes
		Dispatched	5/07/06	5:55:41		
		Enroute	5/07/06	5:55:50		
		At Scene	5/07/06	6:01:24		
		In Service	5/07/06	6:49:05		

=====

Employee	Assignment	Position	Action taken
9236 PATRICK MONCKTON	Paramedic	Paramedic	
9423 EDWARD MCGARRY	Paramedic	Paramedic	

=====

B	Apparatus	Type	Personnel	Use	Action taken	Emergency
	945	Truck or aerial	5	Suppression		Yes
		Dispatched	5/07/06	5:38:57		
		Enroute	5/07/06	5:40:50		
		At Scene	5/07/06	5:52:37		
		In Service	5/07/06	6:49:05		

=====

Employee	Assignment	Position	Action taken
1388 MICHAEL TERZO	Engineer	Firefighter	
1389 ROCCO FANELLA	Engineer	Firefighter	
1394 JOE DROZD	Firefighter	Firefighter	
1398 BILL KUCERA		Firefighter	
1400 LOUIS BUDICAK	Lieutenant	Firefighter	

=====

B	Apparatus	Type	Personnel	Use	Action taken	Emergency
	946	Engine	2	Suppression		Yes
		Dispatched	5/07/06	5:39:09		
		Enroute	5/07/06	5:40:56		
		At Scene	5/07/06	5:52:39		
		In Service	5/07/06	6:49:05		

=====

Employee	Assignment	Position	Action taken
1388 MICHAEL TERZO	Engineer	Firefighter	
1394 JOE DROZD	Firefighter	Firefighter	

=====

ELMWOOD PARK FIRE DEPARTMENT
Prepared: 5/23/06, 11:27:25
Program: [REDACTED]

Incident Report

Page 4

=====

A	CN212 IL	5/07/06	Both Stations	[REDACTED]	NFIRS - 9/10
	FDID State	Incident date	Station	Incident number	Apparatus/Personnel

=====

B	Apparatus	Type		Personnel	Use	Action taken	Emergency
	947	Engine		2	Suppression		Yes
		Dispatched	5/07/06	5:39:09			
		Enroute	5/07/06	5:41:13			
		At Scene	5/07/06	5:42:24			
		In Service	5/07/06	6:49:05			

Employee	Assignment	Position	Action taken
1389 ROCCO FANELLA	Engineer	Firefighter	
1400 LOUIS BUDICAK	Lieutenant	Firefighter	

=====

B	Apparatus	Type		Personnel	Use	Action taken	Emergency
	949	Chief officer car		1	Suppression		Yes
		Dispatched	5/07/06	5:38:57			
		Enroute	5/07/06	5:40:51			
		At Scene	5/07/06	5:42:21			
		In Service	5/07/06	6:49:05			

Employee	Assignment	Position	Action taken
1413 MICHAEL COLLINS	Shift Commander	Shift Commander	

=====

ELMWOOD PARK FIRE DEPARTMENT

Incident Report

Page 5

Prepared: 5/23/06, 11:27:25

Program: [REDACTED]

```
=====
A  CN212 IL      5/07/06    Both Stations    [REDACTED]
   FDID State    Incident date Station        Incident number      Additional information
=====
Day of week . . . . . : 001 Sunday
Common name . . . . . : [REDACTED] RESIDENCE
Method of Alarm . . . . . : 8 Voice signal municipal fire alarm center
```

ELMWOOD PARK FIRE DEPARTMENT
Prepared: 5/23/06, 11:27:25
Program: [REDACTED]

Incident Report

Page 6

=====

A	CN212 IL	5/07/06	Both Stations	[REDACTED]	
	FDID State	Incident date	Station	Incident number	Narratives

=====

B Narrative type: Incident

Narrative title Entry date Entered by employee
CAD: DISPATCH INFO SUPPL 5/07/06
060003348
BUILDING FIRE GARAGE ON FIRE

Narrative title Entry date Entered by employee
CAD: CM 5/07/06
060003348
(05:39:51 ON 05/07/06) RIVER GROVE NOTIFIED (05:40:27 ON 05/07/06)
NORWOOD PK NOTIFIED

Narrative title Entry date Entered by employee
CAD: CM 5/07/06
060003348
RIVER GROVE WAS ON SCENE 0545HRS

Narrative title Entry date Entered by employee
CAD: CM 5/07/06
060003348
(05:52:34 ON 05/07/06) COMED NOTIFIED PER 3100 WILL CALL BACK WITH AN
ETA

Narrative title Entry date Entered by employee
CAD: CM 5/07/06
060003348
943 RESPONDING FROM GOTTLIEB

Narrative title Entry date Entered by employee
CAD: CM 5/07/06
060003348
(06:06:52 ON 05/07/06) PAGE FOR STATION COVERAGE AND INSPECTOR

Narrative title Entry date Entered by employee
CAD: CM 5/07/06
060003348
(06:10:20 ON 05/07/06) COMED ON SCN

Narrative title Entry date Entered by employee
CAD: CM 5/07/06
060003348
0613HRS DDC CAPT VENTURE UNAVAILABLE / WISCONSIN 0615HRS DIV 20 FOR
FIRE INV BOX TONED OUT PER 940 NO MORE CALLS NEEDED FOR INVESTIGATER
PAST VENTURA

Narrative title Entry date Entered by employee
CAD: CM 5/07/06
060003348
NOT COM ASKING IF STATE FIRE MARSHAL REQ'D. NEG PER 040/06-21-22 ON

PE06-048-0551LC

ELMWOOD PARK FIRE DEPARTMENT

Incident Report

Page 7

Prepared: 5/23/06, 11:27:25

Program: [REDACTED]

=====

FDID	State	Incident date	Station	Incident number	Narratives
------	-------	---------------	---------	-----------------	------------

=====

A CN212 IL 5/07/06 Both Stations [REDACTED]

B Narrative type: Incident

Narrative title	Entry date	Entered by employee
Dispatch narrative	0/00/00	
05/07/06)		

Narrative title	Entry date	Entered by employee
Narrative	5/07/06	1413 MICHAEL COLLINS
This was a garage fire at 7755 Sunsat that we received a call on at 05 37 hours om May 7, 2006. This is the residence of [REDACTED] Th e residence phone # [REDACTED] The cause of this fire is under inv estigation. The fire may have started in the 2003 Ford Escape that wa s parked in the garage. The fire extensively damaged the garage.		



Photo No. 1: Overall view of the front of the vehicle.



Photo No. 2: The vehicle identification plate.

File No.:

Insured:



Photo No. 3: The windshield area.



Photo No. 4: The burn patterns on the driver's side hood and dashboard.

File No.:

Insured:

Page 2 of 27



PE06-048-0554LC



Photo No. 5: The driver's side dashboard area



Photo No. 6: The dashboard and windshield area.



Photo No. 7: Overall view of the hood.



Photo No. 8: The burned area on the driver's side rear portion of the hood.

File No.:

Insured:

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PE06-048-0556LC



Photo No. 9: Overall view of the front grill.



Photo No. 10: Overall view of the passenger side of the fender.

File No.:

Insured:

Page 5 of 27



Photo No. 11: Overall view of the passenger side of the vehicle.



Photo No. 12: Overall view of the rear of the vehicle.

File No.:

Insured:



Photo No. 13: Overall view of the driver's side of the vehicle.



Photo No. 14: Overall view of the driver's side front fender.

File No.: [REDACTED]

Page 7 of 27

Insured: [REDACTED]



Photo No. 15: Overall view of the front passenger compartment.



Photo No. 16: Overall view of the front passenger compartment.

File No.:

Insured:



Photo No. 17: The keys for the vehicle.



Photo No. 18: Overall view of this interior dashboard area.

File No.: [REDACTED]
Insured: [REDACTED]



Photo No. 19: Overall view of the receivers seating area.



Photo No. 20: Overall view of the trunk area.

File No.:

Insured:

Page 10 of 27



PE06-048-0562LC



Photo No. 21: Overall view of the under side of the hood.



Photo No. 22: Overall view of the engine compartment.

File No.: [REDACTED]

Insured: [REDACTED]



Photo No. 23: Overall view of the driver's side of the engine compartment.



Photo No. 24: Overall view of the passenger's side of the engine compartment.

File No.:

Insured:

Page 12 of 27



Photo No. 25: The passenger side front quadrant of the engine compartment



Photo No. 26: Overall view of the engine block.

File No.: [REDACTED]

Page 13 of 27

Insured: [REDACTED]



Photo No. 27: Overall view of the fuse block and battery.



Photo No. 28: Overall view of the driver's side and rear quadrants of the engine.

File No.: [REDACTED]

Insured: [REDACTED]



Photo No. 29: Overall view of the passenger side rear quadrant of the engine.



Photo No. 30: Overall view of the passenger side rear quadrant of the engine.

File No.: [REDACTED]

Page 15 of 27

Insured: [REDACTED]



Photo No. 31: Overall view of the battery and fuse block area.



Photo No. 32: Overall view of the fuse connections.

File No.:

Insured:



Photo No. 33: Overall view of the rear portion of the engine compartment.



Photo No. 34: Directional burn patterns on the driver's side of the engine block.

File No.: [REDACTED]

Page 17 of 27

Insured: [REDACTED]



PE06-048-0569LC



Photo No. 35: Overall view of the master cylinder and brake fluid area.



Photo No. 36: The directional burns on the driver's side of proportion of the engine compartment.



Photo No. 37: Overall view of the master cylinder and Injun block area.



Photo No. 38: Overall view of the master cylinder.

File No.:



Page 19 of 27

Insured:

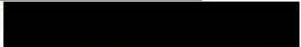




Photo No. 39: Overall view of the starter solenoid.



Photo No. 40: Overall view of the wire harness directly below the master cylinder.

File No.: [REDACTED]

Page 20 of 27

Insured: [REDACTED]



Photo No. 41: Overall view of the wire harness next to the master cylinder.



Photo No. 42: Overall view of the rear wire harness next to the master cylinder.

File No.:

Insured:



Photo No. 43: Directional burns on the engine block.



Photo No. 44: Overall view of the area of origin and engine block.

File No.:

Page 22 of 27

Insured:



PE06-048-0574LC

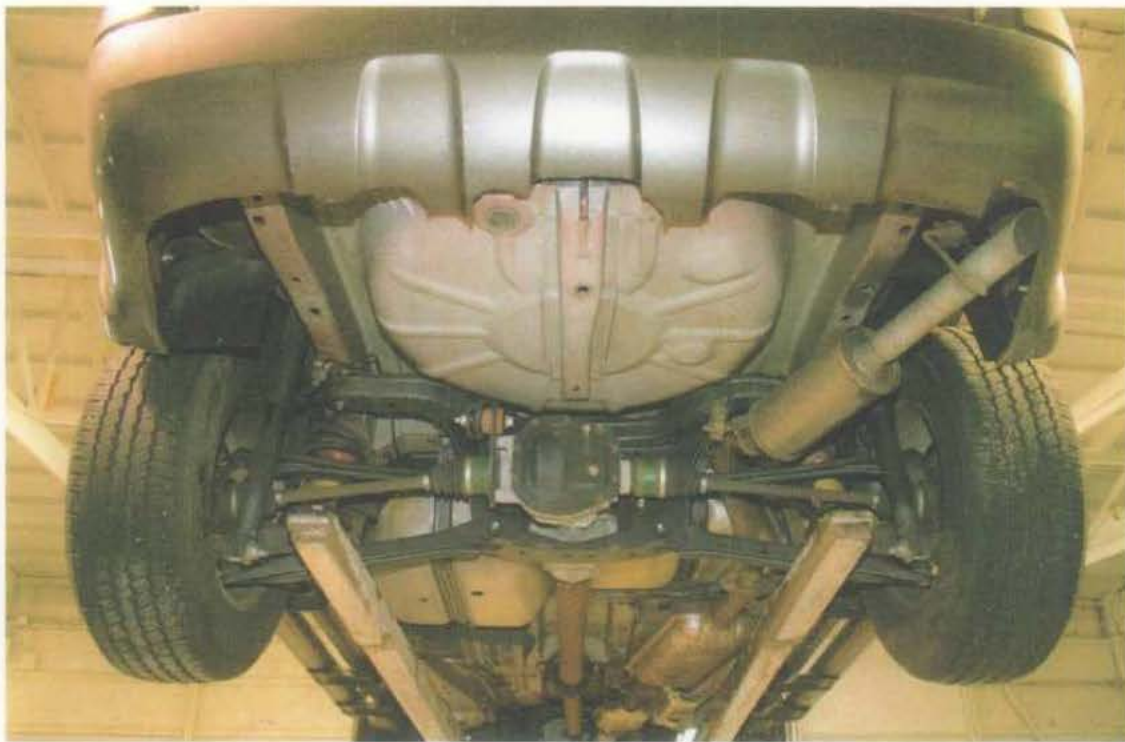


Photo No. 45: Overall view of the underside of the vehicle.



Photo No. 46: Overall view of the underside of the vehicle.

File No.: [REDACTED]

Insured: [REDACTED]



Photo No. 47: The underside of the vehicle and the fuel recovery canister



Photo No. 48: Overall view of the exemplar vehicle

File No.:

Insured:



Photo No. 49: The engine identifier



Photo No. 50: Overall view of the passenger side of the engine compartment

File No.:

Insured:



Photo No. 51: Overall view of the center rear portion of the engine compartment



Photo No. 52: The drivers side portion of the engine compartment

File No.:

Insured:

Page 26 of 27



PE06-048-0578LC

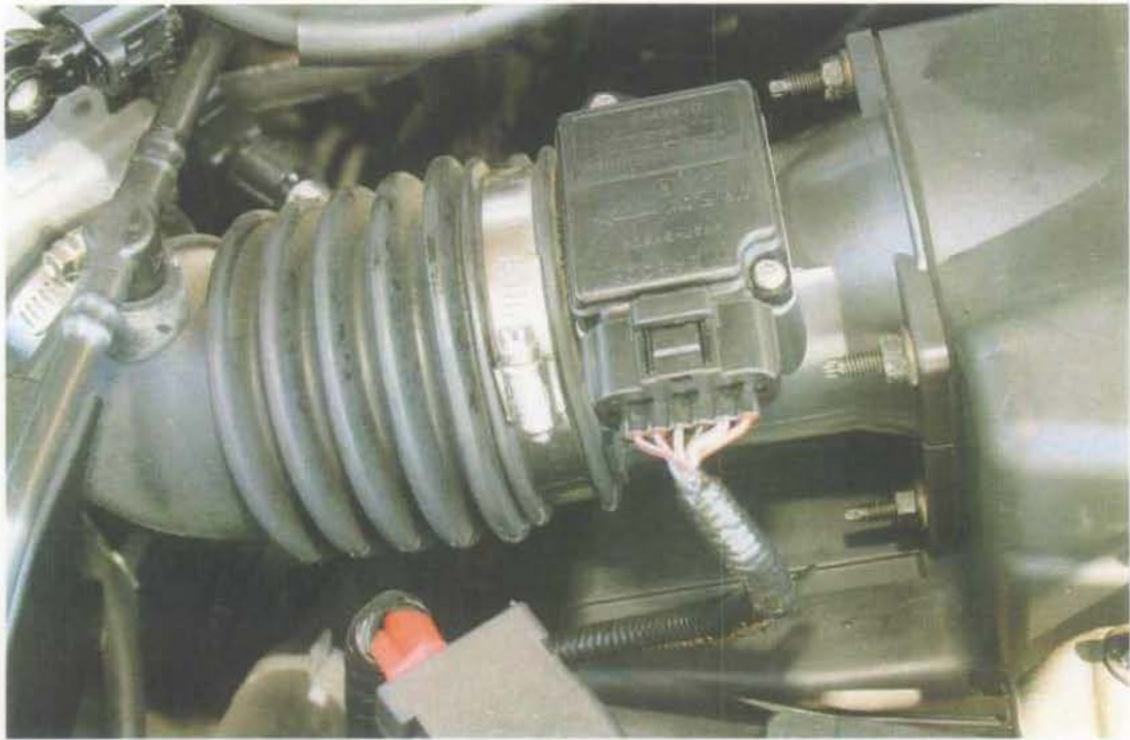


Photo No. 53: The mass air flow

Photo No. 54:

File No.:

Insured:

Page 27 of 27





PREFERRED MUTUAL INSURANCE COMPANY

One Preferred Way, New Berlin, New York 13411

TEL: (800) 333-7642 FAX: (607) 847-9414

www.pminsko.com

July 1, 2005

FORD MOTOR COMPANY
OFFICE OF GENERAL COUNSEL
PARKLANE TOWERS WEST
SUITE 300
THREE PARKLANE BLVD
DEARBORN MI 48126

JUN 23 2006

RE: INSURED: [REDACTED]
OUR FILE NO: [REDACTED]
DATE OF OCCURRENCE: 6/9/2006
VEHICLE: 2001 Ford Escape XLT
VIN NO.: 1FMYU04151K [REDACTED]

Dear Sirs:

We are subrogated to the rights of our insured arising out of an fire which took place on June 9, 2006.

We believe this fire is a result of a manufacturer defect and are putting you on notice of our subrogation rights for any amounts we pay. As of this date, we have not made payment.

Please be advised that the vehicle is located for your inspection at [REDACTED]
Central Avenue, Albany, NY [REDACTED] You need to refer to lot
number [REDACTED]

If you have any questions, please feel free to contact me at 1-800-333-7642, extension 1337.

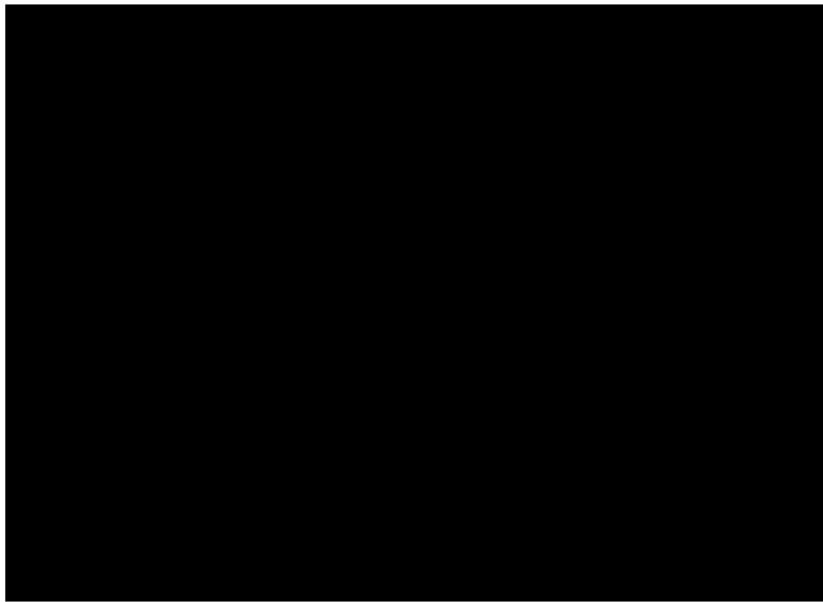
Very Truly Yours,

Patricia M. Kukulech
Subrogation Specialist

Cc: Kemper Auto & Home
Attention Darlene Grevelding
PO Box 4780
Syracuse NY 13221

When it comes to insurance - We're Preferred

PE06-048-0581LC



ISSUE LIST				
Last Handling Date/ Issue Status	Name/ Reason Desc	Vin/ Case No.	Model Year and Vehicle Line	Issue Type
7/25/2006 CLOSED	[REDACTED] LEGAL - ACCIDENT / FIRE	1FMYU031X2K [REDACTED] [REDACTED]	2002 ESCAPE	07

Ford Confidential

All Action Details for Issue

[Print](#)

VIN: 1FMYU031X2K [REDACTED] Year: 2002
Name: [REDACTED] Owner Status: Subsequent
Symptom Desc: GENERAL INQUIRIES REQUEST/NON-VEHICLE RELATED
Reason Desc: LEGAL - ACCIDENT / FIRE
Issue Type: 07 LEGAL Issue Status: CLOSED

Model: ESCAPE Case: [REDACTED]
WSD: 2001-12-04
Primary Phone: [REDACTED]
Secondary Phone: [REDACTED]

Action: ADVISE CUST INFORMATION WILL BE SENT TO CONSUMER AFFAIRS - FIRE
Dealer: 00712 CAPISTRANOFORD Origin Desc: US CONCERN CASE BASE
Odometer: 52000 MI Comm Type: PHONE
Analyst Name: HOWARD CAMESHA Analyst: CHOWAR37
Action Date: 07/24/2006 Action Time: 11.40.35.459 Action Data: No

Comments CUSTOMER SAID: JULY 23 CAR CAUGHT ON FIRE AT HOME FILED REPORT BUT DID NOT GIVE CUST NUMBER. REPORT FILED IN ORANGE COUNTY HAS NOT CONTACTED INSURANCE CO. VEH IS REPAIRABLE. VEH WAS NOT RUNNING. DEALER SAID: CAPISTRANO FORD 33949 CAMINO CAPISTRANO SAN JUAN CAPISTRANO, CA 92675 TEL: (800) 872-9912. CRC ADVISED: - I WILL FORWARD THIS INFORMATION TO OUR CONSUMER AFFAIRS GROUP. YOU WILL RECEIVE WRITTEN NOTIFICATION FROM CONSUMER AFFAIRS WITHIN 7-10 BUSINESS DAYS. PLEASE NOTIFY YOUR INSURANCE CARRIER AND REPORT THE ACCIDENT. -----CRC ADVISED ABOVE

Action: SEND ACKNOWLEDGEMENT LETTER TO CUSTOMER
Dealer: 00712 CAPISTRANOFORD Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION
Odometer: 52000 MI Comm Type: MAIL
Analyst Name: TANGIE RODGERS Analyst: TRODGE14
(TRODGE14)
Action Date: 07/25/2006 Action Time: 13.49.57.012 Action Data: No

Comments LPA TO SEND CUST LETTER DENYING ASSISTANCE AS VEH IS OUTSIDE OF WARRANTY, HAS NO OPEN RECALLS, AND CUST SUSTAINED NO INJURIES.

Action: CLOSING COMMENTS - DENIAL - BASED ON LITIGATION PREVENTION REVIEW
Dealer: 00712 CAPISTRANOFORD Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION
Odometer: 52000 MI Comm Type: MAIL
Analyst Name: TANGIE RODGERS Analyst: TRODGE14
(TRODGE14)
Action Date: 07/25/2006 Action Time: 13.50.13.890 Action Data: No

Comments LPA TO SEND CUST LETTER DENYING ASSISTANCE AS VEH IS OUTSIDE OF WARRANTY, HAS NO OPEN RECALLS, AND CUST SUSTAINED NO INJURIES.

Ford Confidential

8/7/2006
PE06-048-0584LC



Allstate

You're in good hands.

1707 BOX 6521
DIAMOND BAR CA

subro
7/8/8

|||||
FORD CUSTOMER RELATIONSHIP CENTER
PO BOX 6248
DEARBORN MI 48121-6248

JUL 31 2006

July 25, 2006

INSURED: [REDACTED]
DATE OF LOSS: July 24, 2006
CLAIM NUMBER: [REDACTED] GCL

PHONE NUMBER: [REDACTED]
FAX NUMBER: [REDACTED]
OFFICE HOURS: Mon - Fri 8:00am - 5:30pm

Dear Sir/Madam,

Please be advised that our insured, [REDACTED] 2002 Ford Escape, Vin # 1FMYU031X2K [REDACTED] was involved in an electrical fire on 07/24/06, which may be related to a mechanical malfunction.

We have hired Hot Wire Electric to do a Cause and Origin Report on the loss. Please contact Carol Rodeback at 714-534-7650 to set up an inspection time so that both the Ford Representative and Hot Wire can meet at the same time to complete their investigation. Once we have reviewed the report, we will decide if we will be pursuing subrogation against Ford.

The vehicle as of this date is currently located at Capistrano Ford, 33949 Camino Capistrano; San Juan Capistrano, CA 92675, phone number is 949-487-3023. Please contact them at your earliest convenience to schedule your inspection of the vehicle. Please note that our insured would like the vehicle seen as soon as possible so that the repairs can begin on his vehicle.

If you have any questions please contact me at the number listed below. My working hours are Monday through Friday, 7:30am to 4:00pm, PST.

Sincerely,

CONNIE LACAGNINA

CONNIE LACAGNINA
909-612-2047
Allstate Indemnity Company

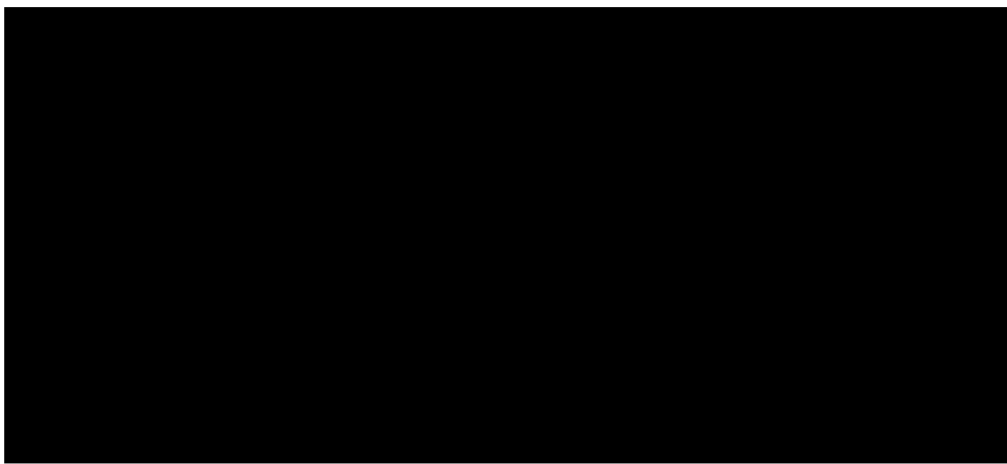
6 JUL 31 A7:38

CONSUMER AFFAIRS
SECTION

GENI001

1675750457 GCL

PE06-048-0585LC





AMERICAN FAMILY INSURANCE GROUP

4802 MITCHELL AVENUE • ST. JOSEPH MO 64507-2500 • PHONE: 816-364-1541

September 1, 2006

FORD MOTOR COMPANY
PO BOX 70
DEARBORN, MICHIGAN

RE: Your Insured:
Your File Number:
Our Claim Number: [REDACTED]
Our Insured:
Date of Accident: July 18, 2006
Total Claim: \$4882.44
Company Portion: \$4,782.44
Insured's Deductible: \$100

Dear Ford Motor:

We have been informed that you are the insurance carrier for the above-named party. It appears from our investigation that the incident in question was caused by your insured's negligence. The total damage as well as the loss paid by the American Standard Insurance Company of Wisconsin are stated above.

If the party named above is insured in your company, we would appreciate your offer of settlement. Such offer should take into consideration the total amount of the loss, including our insured's interest.

Respectfully,

Tona Williams
Casualty Claim Analyst
Twillia4@amfam.com
1-800-374-1111, Extension 55381
American Family Mutual Insurance Company

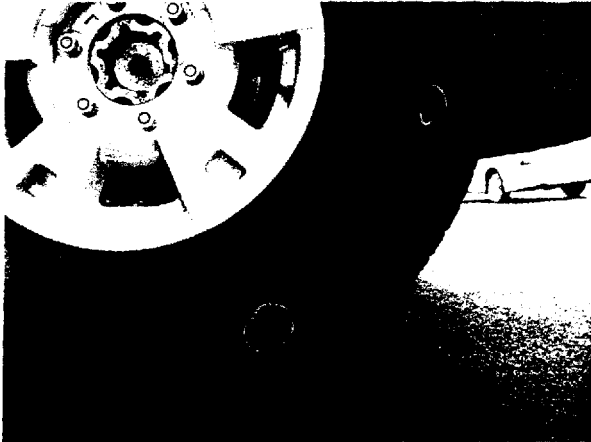
Enc.

cc: -

SEP 05 2006

PE06-048-0587LC

Images



Description : Image 15

Comments : two spot rt frt tire



Description : Image 16

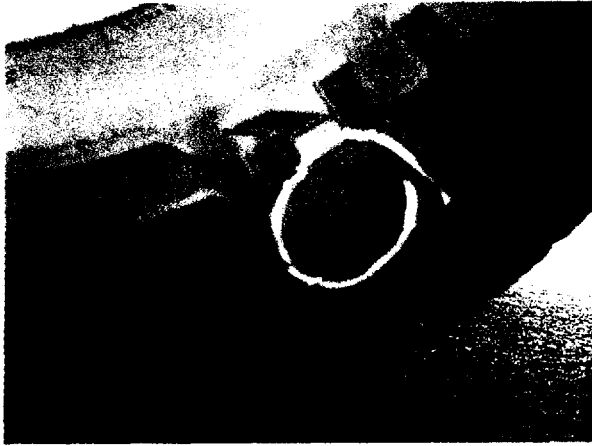
Comments : blistered rt rear w/o



Description : Image 17

Comments : rt rear w/o flare

Images



Description : Image 14

Comments : rt frt tire blistered

8/7/2006

PE06-048-0589LC

Images

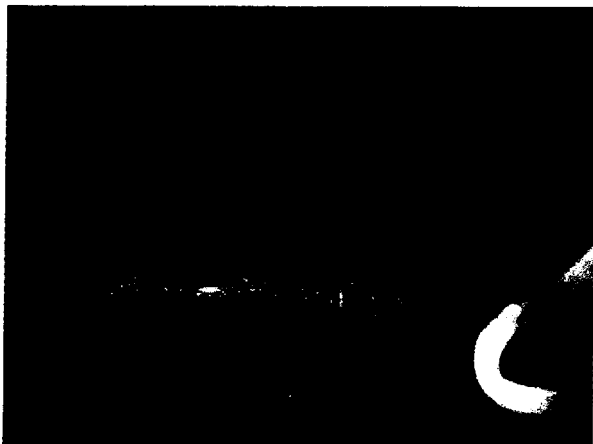


Description : Image 12
Comments : roof



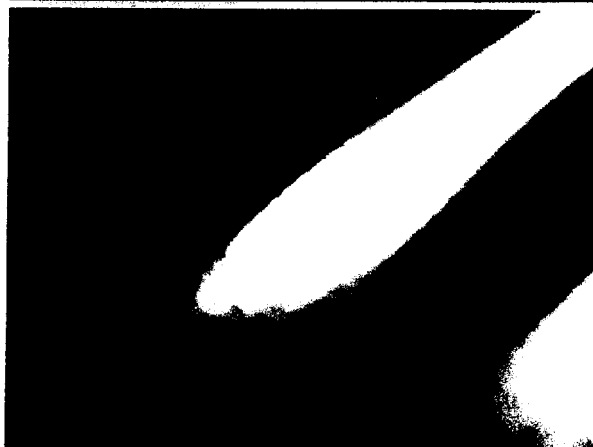
Description : Image 13
Comments : rt frt splash shield melted

Images



Description : Image 11

Comments : rt roof molding melted



Description : Image 12

Comments : roof

8/7/2006

PE06-048-0591LC

Images



Description : Image 10

Comments : It roof molding melted

8/7/2006

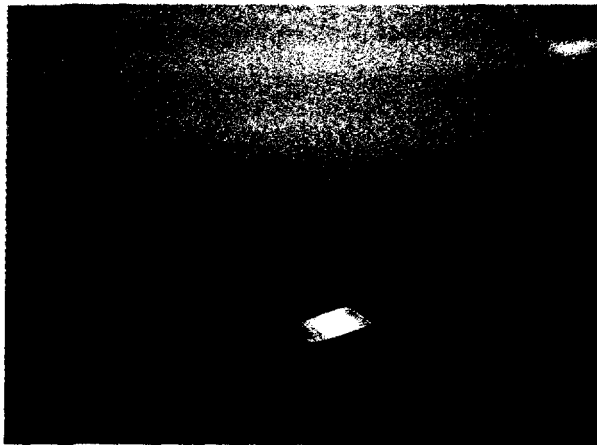
PE06-048-0592LC

Images



Description : Image 8

Comments : rt rear door stained and handle
melted



Description : Image 9

Comments : headliner smoke damaged

8/7/2006

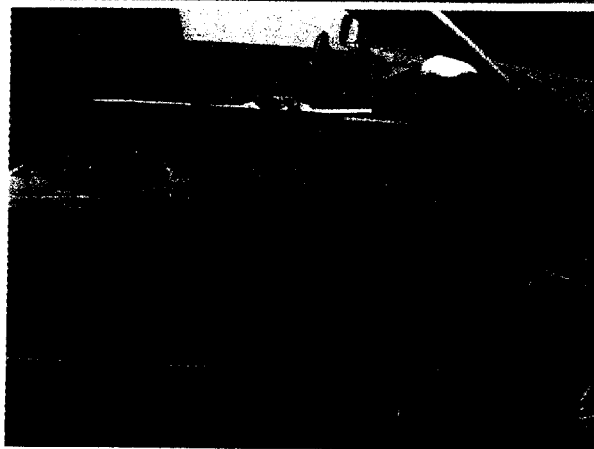
PE06-048-0593LC

Images



Description : Image 6

Comments : rt fender and flare burned



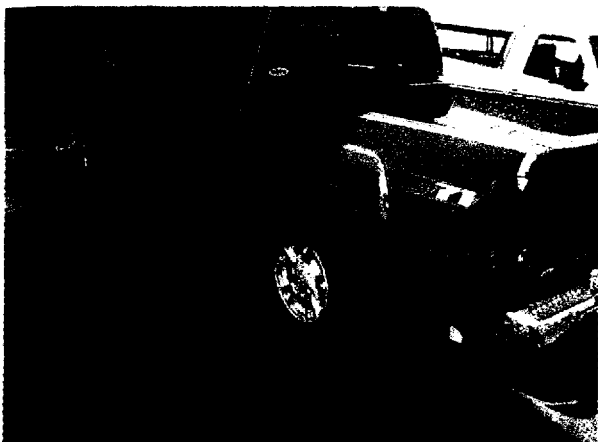
Description : Image 7

Comments : rt door burned

8/7/2006

PE06-048-0594LC

Images



Description : Image 4

Comments : It rear smoke



Description : Image 5

Comments : roof burned and something melted

8/7/2006

PE06-048-0595LC

Images



Description : Image 1

Comments : lt front smoke



Description : Image 2

Comments : rt frt fire damage



Description : Image 3

Comments : rt rear smoke

Description : Image 4

Comments : lt rear smoke

8/2/2006

PE06-048-0596LC

Images



Description : Image 1

Comments : lt front smoke



Description : Image 2

Comments : rt frt fire damage



Description : Image 3

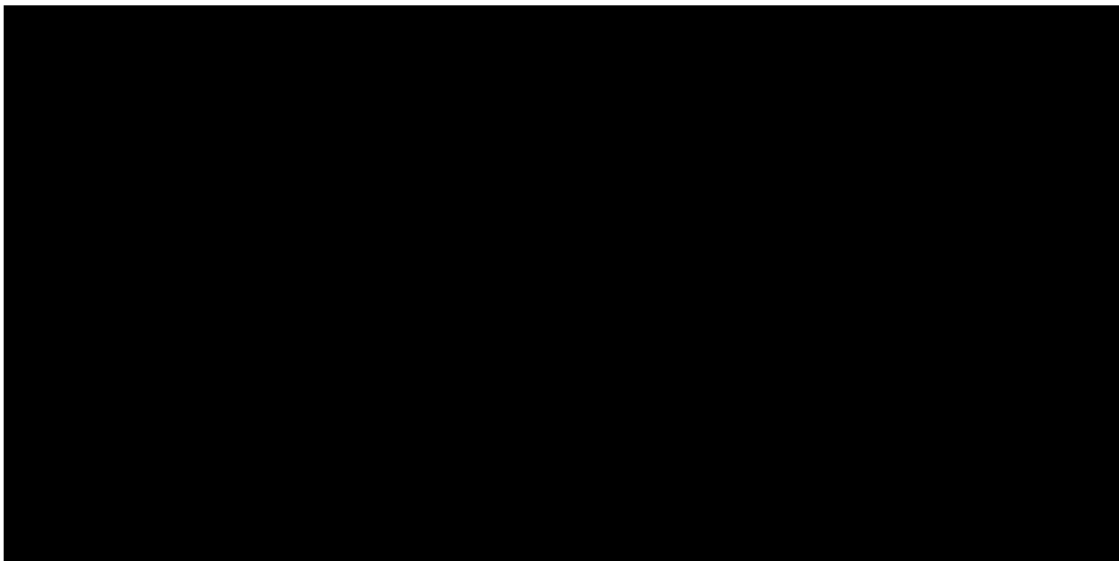
Comments : rt rear smoke

Description : Image 4

Comments : lt rear smoke

8/2/2006

PE06-048-0597LC



ISSUE LIST

Last Handling Date/ Issue Status	Name/ Reason Desc	Vin/ Case No.	Model Year and Vehicle Line	Issue Type
8/26/2002 CLOSED	[REDACTED] PRODUCT - NEGATIVE FEEDBACK	1FMYU04172K [REDACTED]	2002 ESCAPE	02

Ford Confidential

All Action Details for Issue

[Print](#)

VIN: 1FMYU04172K [REDACTED]

Year: 2002

Model: ESCAPE

Case: [REDACTED]

Name: [REDACTED]

Owner Status: Original

WSD: 2001-10-26

Symptom Desc:

Primary Phone: [REDACTED]

Reason Desc: PRODUCT - NEGATIVE FEEDBACK

Secondary Phone: [REDACTED]

Issue Type: 02 INFORMATION

Issue Status: CLOSED

Action: ADVISE CUSTOMER THE FEEDBACK HAS BEEN DOCUMENTED

Dealer:

Origin Desc: US INQUIRY CASE BASE

Odometer: 12000 MI

Comm Type: PHONE

Analyst Name: JULLIAN TAYLOR

Analyst: JTAYLOR

Action Date: 08/26/2002

Action Time: 10.58.30.886

Action Data: No

Comments VLC092TCUSTOMER SAYS: =ALL THE HANDLES ARE LOOSE ON THE VEH =DLR ADVISED THAT THIS IS THE WAY IT IS PER CUSTOMER, DEALER SAYS: =GARY CROSSLEY FORD INC 1600 W 152 HWY. LIBERTY, MO 64068 TEL: (816) 781-4844 FAX: (816) 415-8782 CAC ADVISED: THANK YOU FOR PROVIDING FORD MOTOR COMPANY WITH YOUR THOUGHTS; YOUR OPINIONS ARE VALUABLE TO US. I HAVE DOCUMENTED YOUR FEEDBACK AND THE INFORMATION YOU PROVIDED REGARDING YOUR EXPERIENCE WITH OUR PRODUCT. THIS INFORMATION IS FORWARDED TO VARIOUS DEPARTMENTS WITHIN FORD TO CONTINUOUSLY IMPROVE OUR PRODUCTS AND SERVICES. YOU WILL ONLY BE CONTACTED IF A SPECIFIC DEPARTMENT REQUIRES ADDITIONAL INFORMATION OR CLARIFICATION. INFERENCE CASE ID: 867

Ford Confidential

8/24/2006

PE06-048-0600LC

Images



Description :

Comments :



Description :

Comments :

8/8/2006

PE06-048-0601LC

Images



Description :
Comments :



Description :
Comments :

8/8/2006

PE06-048-0602LC

Images



Description :
Comments :



Description :
Comments :

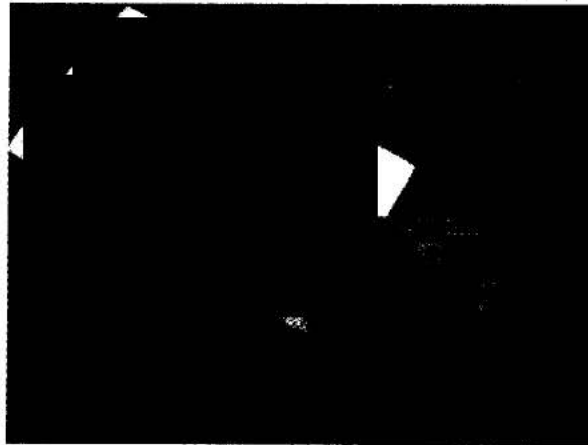
8/8/2006

PE06-048-0603LC

Images



Description :
Comments :

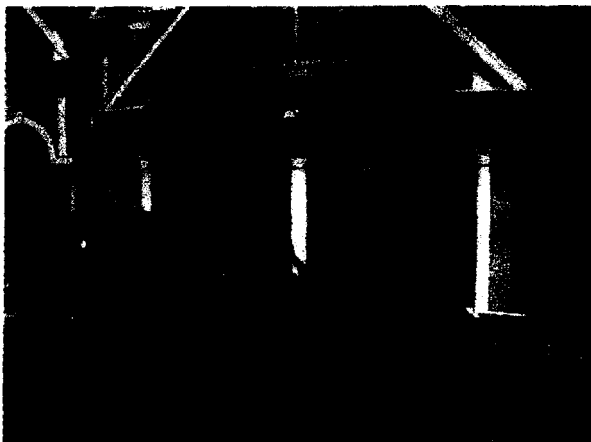


Description :
Comments :

8/8/2006

PE06-048-0604LC

Images



Description :

Comments :

8/8/2006

PE06-048-0605LC



AMERICAN FAMILY INSURANCE GROUP

4802 MITCHELL AVENUE • ST. JOSEPH MO 64507-2500 • PHONE: 816-364-1541

September 1, 2006

FORD MOTOR COMPANY
PO BOX 70
DEARBORN, MICHIGAN

O

SEP 9 2006

RE:

Our Claim Number: [REDACTED]
Our Insured: [REDACTED]
Date of Accident: July 18, 2006
Total Claim: \$13,995.00
Company Portion: \$13,495.00
Insured's Deductible: \$500

Dear Ford Motor Company:

We have been informed that you are the insurance carrier for the above-named party. It appears from our investigation that the incident in question was caused by your insured's negligence. The total damage as well as the loss paid by the American Family Mutual Insurance Company are stated above.

If the party named above is insured in your company, we would appreciate your offer of settlement. Such offer should take into consideration the total amount of the loss, including our insured's interest.

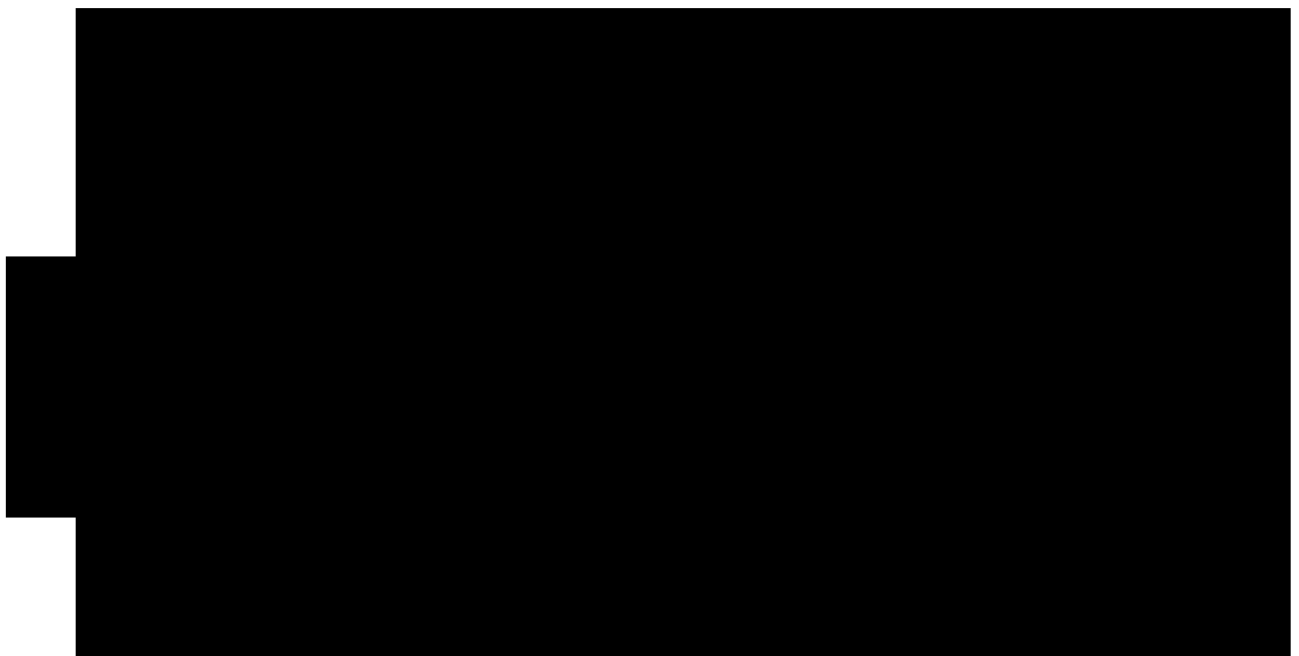
Respectfully,

Tona Williams
Casualty Claim Analyst
Twillia4@amfam.com
1-800-374-1111, Extension 55381
American Family Mutual Insurance Company

Enc.

cc: -

PE06-048-0606LC





Insurance Services

Subrogation Department

P.O. Box 3068 | Bloomington, IL 61702 | Phone 888-767-2361 | Fax 309-820-2626

AUG 29 2006

August 22, 2006

FORD MOTORS
PO BOX 6248
DEARBORN, MI 481216248

Re: Our File # [REDACTED]
Claim # [REDACTED]
Insured: [REDACTED]
Date of Loss: December 7, 2005
Total Damages: \$14,682.76



Dear FORD MOTORS:

We are contacting you today on behalf of AMERICAN FAMILY INSURANCE regarding a loss, which occurred on December 7, 2005. The facts of the incident indicate that you are liable for payments that AMERICAN FAMILY INSURANCE made to its policyholder as a result of the loss. The balance due is \$14,682.76.

If you believe you had insurance coverage at the time of the loss, notify us by mailing back the attached page immediately. A reply envelope is enclosed for your convenience, or you may fax the information to us at 309-820-2626.

If you did not have insurance coverage at the time of the loss, please pay the balance in full today. Afni accepts payments made by check, money order, Western Union Quick Collect, or check by phone. Please enclose the attached page with your payment.

We are in a position to help you find the means to pay this balance. Please feel free to call us toll-free at 888-767-2361 to discuss your options. Call immediately if you have questions about this claim.

Sincerely,

Josh Wiley

JOSH WILEY EXT 3651 AIC
Subrogation Specialist

CC: [REDACTED]

6 AUG 29 18:44

OFFICE OF THE
GENERAL COUNSEL

PE06-048-0608LC



Nationwide®
On Your Side™

1000 Market Ave N * OH-01-99 * Canton, OH 44711

January 27, 2006

American Family Insurance
PO Box 781
Cortland, OH 44410

YOUR INSURED : [REDACTED]
YOUR CLAIM NUMBER : [REDACTED]
ACCIDENT LOCATION : [REDACTED] EUCLID 44132CUYAHOGA
DATE OF ACCIDENT : 12-07-2005
OUR INSURED : [REDACTED]
OUR CLAIM NUMBER : [REDACTED]

We have completed our investigation into the accident involving the above listed insureds and have found that our insured is not liable. We are, therefore, unable to honor this claim.

Nationwide Mutual Fire Insurance Company
Nicole Claus
Claims Department
(877)233-2626 Ext. 4328

Ohio law requires the following: Any person who, with intent to defraud or knowing that he/she is facilitating a fraud against an insurer, submits an application or files a claim containing a false or deceptive statement is guilty of insurance fraud.

PE06-048-0609LC

TOTAL TIME		OFFICE USE		CITY OF EUGENE DIVISION OF FIRE COMPANY INCIDENT REPORT		INCIDENT NO. [REDACTED]	
TOTAL MILES		PRECINCT		LOG PAGE NO. 67		DATE: 12-7-05	
PRECINCT		EMS		ALARM 0		CAUSE 21	
ADDRESS [REDACTED]				***** CHECK ONE *****			
BUILDING NAME:				REPORTING UNIT		ASSISTING UNIT	
ROUTE TO SCENE: [REDACTED]				RESCUE ENGINE # 13		RESCUE / LADDER # 31	
ALARM RECEIVED VIA: 911				DISP. CAR		FIRE CO. PERSONNEL: OFCRS: 1 FIREFIGHTERS: 4	
ALARM REPORTED AS: CAR FIRE				SITUATION FOUND: CAR + HOUSE FIRE		CALL RECEIVED 0553 0553	
DESCRIPTION OF STRUCTURE: STORY: 2 FRAME				TYPE OF OCCUPANCY: SINGLE FAMILY		RESPONDING AT 0555 0555	
EXTENT AND PROGRESS OF FIRE UPON ARRIVAL: CAR FULLY INVOLVED - SIDING ON HOUSE A FIRE				IN-SERVICE		ON-SCENE 0559 0559	
CAUSE OF ALARM: SAME AS ABOVE				IN-QUARTERS		ELAPSED TIME IN MINUTES 71 53	
EQUIPMENT USED: PRYBAR, THERMAL IMAGER, SCBA'S						ODOMETER 87055 77314	
NO. 2-1/2" LINES		FEET OF 2-1/2" HOSE		NO. 1-3/4" LINES		FEET OF 1-3/4" HOSE	
1		200		300		FEET OF 5" HOSE	
NAME OF INSURANCE CO. (BUILDING): AMERICAN FAMILY 591-9050		VALUE:		INSURANCE:		LOSS:	
NAME OF INSURANCE CO. (CONTENTS): UNKNOWN		VALUE:		INSURANCE:		LOSS:	
NAME OF INSURANCE CO. (VEHICLE): NATIONWIDE (800) 421-3535		VALUE:		INSURANCE:		LOSS:	
In addition to the information above, the Company Officer shall make a narrative written report starting from UPON ARRIVAL; giving a detailed description of the fire and/or of the incident, acts and duties performed by individual members or companies and the method employed in extinguishment, control of the incident and the abatement of hazards. This includes acts of members that are considered to be worthy of mention, citizens and/or fire department members injured or killed, department property lost, damaged, or destroyed, and any other information that might tend to give a complete account of the incident.							
UNIT # E3		UPON ARRIVAL: FOUND CAR FULLY INVOLVED PARKED BETWEEN 2 HOUSES AND SIDING OF HOUSE AT ABOVE ADDRESS WAS ON FIRE. STRETCHED MATTI DALE + HIT SIDING FIRST THEN CAR. SENT R3 CREW INTO HOUSE WITH THERMAL IMAGER FOR EXTENSION SEARCH. NO EXTENSION FOUND CAR FIRE PUT OUT. DAMAGE TO HOUSE LIMITED TO SIDING ON DRIVEWAY SIDE. PULLED SOME SIDING LOOKING FOR EXTENSION. NOTHING FOUND. MINIMAL SMOKE INSIDE HOUSE. LOOKED INTO HOUSE NEXT DOOR (NO ONE HOME) NOTHING SEEN. FIRE STARTED IN CAR ENGINE COMPARTMENT. OWNER HAD BEEN RUNNING CAR APPROX 1/2 HR PRIOR TO FIRE BEING DISCOVERED. — OVER —					
COMPANY OFFICER and/or MEMBER: [REDACTED]				APPROVED BY: SHIFT O.I.C. [REDACTED]			
				PAGE 1 of 2			

EUCLID FIRE DEPARTMENT
SUPPLEMENTARY REPORT

INCIDENT NO

SHIFT/STATION

B-3

DATE:

12-7-05

☒ FORM USED AS CONTINUATION SHEET FOR CURRENT REPORT
☐ FORM USED TO REPORT FOLLOW UP INVESTIGATION
OR SUPPLEMENTAL INFORMATION

LARGE AMOUNT FOR CONTENTS OF CAR DUE TO
OWNERS BUSINESS HE IS TECHNICIAN FOR A PACEMAKER +
DEFIB COMPANY APPROX 20 PIECES OF EQUIPMENT
WERE IN HIS CAR. CHARRED + MELTED RUBBLE WAS ALL THAT
WAS LEFT IN REAR AREA OF CAR

COMPANY OFFICER

FR Elliott

APPROVED BY:

PC Dave Shigen PAGE 2 OF 2

ContinuedSuppl

PE06-048-0611LC

OHIO FIRE INCIDENT
REPORTING SYSTEM

INCIDENT REPORT

NFIRS-1

1 ☐ DELETE
2 ☐ CHANGEFire Department Euclid

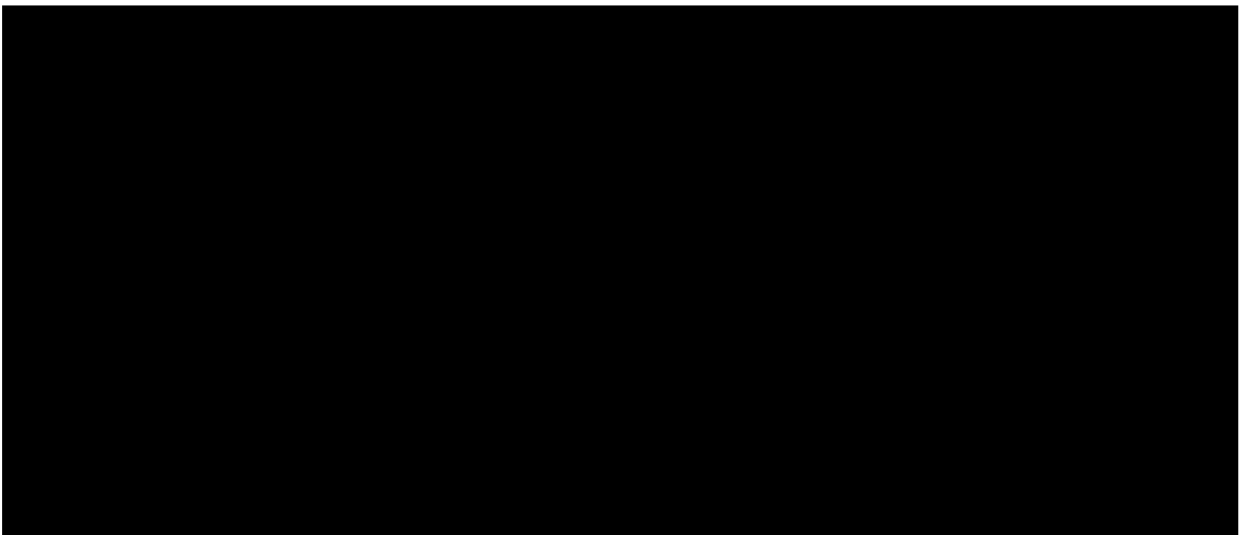
A	FDID <u>118101315</u>	INCIDENT NO. <u>[REDACTED]</u>	EXP. <u>010112</u>	MO. <u>07</u>	DAY <u>05</u>	YEAR <u>05</u>	DAY OF WEEK 1 Sunday 2 Monday 3 Tuesday 4 Wednesday 5 Thursday 6 Friday 7 Sat 8 Sun <u>4</u>	ALARM TIME <u>015153</u>	ARRIVAL TIME <u>051519</u>	TIME IN SERVICE <u>016154</u>																																								
B	<table border="1"><tr><td>SITUATION FOUND</td><td>22-Air Gas, Rupture</td><td>44-Power line down</td><td>55-Assist Police</td><td>72-Bomb Scare</td></tr><tr><td>11-Structure Fire</td><td>32-Emergency Medical call</td><td>45-Arcing electric equipment</td><td>56-Unauthorised burning</td><td>73-Alarm Malfunction</td></tr><tr><td>12-Outside Dollar Loss</td><td>33-Locked-in trapped</td><td>46-Aircraft standby</td><td>57-Move-up</td><td>74-Unintentional false</td></tr><tr><td>13-Vehicle Fire</td><td>34-Search</td><td>47-Chemical spill</td><td>58-Other service calls</td><td>99-Unclassified</td></tr><tr><td>14-Brush, grass, leaves</td><td>35-Extinguished</td><td>51-Lock-out</td><td>61-Smoke scare</td><td>Other <u>See page 17-19</u></td></tr><tr><td>15-Trash, Rubbish</td><td>41-Spill, leak-No fire</td><td>52-Water removal</td><td>63-Controlled burn</td><td></td></tr><tr><td>16-Explosion, No after fire</td><td>42-Explosive, Bomb removal</td><td>53-Smoke odor removal</td><td>65-Steam, gas mistaken for smoke</td><td></td></tr><tr><td>17-Outside spill with fire</td><td>43-Excessive Heat</td><td>54-Animal Rescue</td><td>71-Malicious false</td><td></td></tr></table>										SITUATION FOUND	22-Air Gas, Rupture	44-Power line down	55-Assist Police	72-Bomb Scare	11-Structure Fire	32-Emergency Medical call	45-Arcing electric equipment	56-Unauthorised burning	73-Alarm Malfunction	12-Outside Dollar Loss	33-Locked-in trapped	46-Aircraft standby	57-Move-up	74-Unintentional false	13-Vehicle Fire	34-Search	47-Chemical spill	58-Other service calls	99-Unclassified	14-Brush, grass, leaves	35-Extinguished	51-Lock-out	61-Smoke scare	Other <u>See page 17-19</u>	15-Trash, Rubbish	41-Spill, leak-No fire	52-Water removal	63-Controlled burn		16-Explosion, No after fire	42-Explosive, Bomb removal	53-Smoke odor removal	65-Steam, gas mistaken for smoke		17-Outside spill with fire	43-Excessive Heat	54-Animal Rescue	71-Malicious false	
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C	ACTION TAKEN					MUTUAL AID		1-Rec'd 2-Given N/A																																										
D	1-Extinguishment					1		N/A																																										
E	2-Rescue or Assistance																																																	
F	3-Investigation only																																																	
G	4-Remove Hazard																																																	
H	5-Stand by																																																	
I	6-Salvage																																																	
J	7-Ambulance																																																	
K	8-Fill in, Move up																																																	
L	9-Not classified																																																	
M	0-Undetermined																																																	
N	FIXED PROPERTY USE (Occupancy) Pg 23-43					IGNITION FACTOR Pg 44-45																																												
O	<u>91613</u>					<u>510</u>																																												
P	CORRECT ADDRESS (Up to maximum of 21 characters)																																																	
Q	<u>[REDACTED]</u>																																																	
R	OCCUPANT NAME (LAST, FIRST, MI)																																																	
S	<u>[REDACTED]</u>																																																	
T	TELEPHONE																																																	
U	<u>[REDACTED]</u>																																																	
V	ROOM or APT.																																																	
W	<u>[REDACTED]</u>																																																	
X	ADDRESS																																																	
Y	<u>Same</u>																																																	
Z	TELEPHONE																																																	
AA	<u>Same</u>																																																	
AB	METHOD OF ALARM																																																	
AC	1-Telephone direct																																																	
AD	2-Municipal alarm system																																																	
AE	3-Private alarm system																																																	
AF	4-None																																																	
AG	5-Verbal																																																	
AH	6-No alarm rec'd																																																	
AI	7-Tie-line (911)																																																	
AJ	8-Voice signal/municipal alarm signal																																																	
AK	9-Not classified above																																																	
AL	0-Undetermined or not reported																																																	
AM	7																																																	
AN	CO. INSPECTION DISTRICT																																																	
AO	3																																																	
AP	SHIFT																																																	
AQ	B																																																	
AR	NO. ALARMS																																																	
AS	1																																																	
AT	NO. FIRE SERVICE PERSONNEL RESPONDED																																																	
AU	116																																																	
AV	NO. ENGINES RESPONDED																																																	
AW	2																																																	
AX	NO. AERIAL APPARATUS RESPONDED																																																	
AY	1																																																	
AZ	NO. OTHER VEHICLES RESPONDED																																																	
BA	4																																																	
BB	NUMBER OF INJURIES																																																	
BC	FIRE SERVICE																																																	
BD	OTHER																																																	
BE	NUMBER OF FATALITIES																																																	
BF	FIRE SERVICE																																																	
BG	OTHER																																																	
BH	COMPLEX Pg 61-62																																																	
BI	411																																																	
BJ	MOBILE PROPERTY TYPE Pg. 63-65 (Complete Line S)																																																	
BK	NA = 08																																																	
BL	111																																																	
BM	AREA OF FIRE ORIGIN Pg 67-69																																																	
BN	183																																																	
BO	EQUIPMENT INVOLVED IN IGNITION Pg. 71-72 (Complete Line T) 98																																																	
BP	196																																																	
BQ	FORM OF HEAT IGNITION Pg 74-76																																																	
BR	20																																																	
BS	TYPE OF MATERIAL IGNITED Pg 78-79																																																	
BT	100																																																	
BU	FORM OF MATERIAL IGNITED Pg 80-81																																																	
BV	100																																																	
BW	METHOD OF EXTINGUISHMENT																																																	
BX	1-Self extinguished																																																	
BY	2-Make shift aids																																																	
BZ	3-Portable extinguisher																																																	
CA	4-Automatic ext. system																																																	
CB	5-Pre-connect hose/tank only																																																	
CC	6-Pre-connect hose/hydrant draft standpipe																																																	
CD	7-Hand-laid hose/hydrant draft standpipe																																																	
CE	8-Master stream device																																																	
CF	9-Not classified above																																																	
CG	0-Undetermined or not reported																																																	
CH	6																																																	
CI	LEVEL OF FIRE ORIGIN																																																	
CJ	1-Grade level to 9 ft																																																	
CK	2-10 to 19 feet																																																	
CL	3-20 to 29 feet																																																	
CM	4-30 to 49 feet																																																	
CN	5-50 to 70 feet																																																	
CO	6-Over 70 feet																																																	
CP	7-Objects in flight																																																	
CQ	8-Below ground level																																																	
CR	9-Not classified above																																																	
CS	0-Undetermined																																																	
CT	1																																																	
CU	ESTIMATED TOTAL DOLLAR LOSS																																																	
CV	[REDACTED]																																																	
CA	Number of Stories																																																	
CB	1-1 story																																																	
CC	2-2 story																																																	
CD	3-3 to 4 stories																																																	
CE	4-5 to 6 stories																																																	
CF	5-7 to 12 stories																																																	
CG	6-13 to 24 stories																																																	
CH	7-25 to 49 stories																																																	
CI	8-50 stories or more																																																	
CJ	9-Number of stories																																																	
CK	0-Undetermined or not reported																																																	
CL	0																																																	
CM	CONSTRUCTION TYPE																																																	
CN	1-Fire resistive																																																	
CO	2-Heavy timber																																																	
CP	3-Protected noncombustible																																																	
CQ	4-Unprotected noncombustible																																																	
CR	5-Protected ordinary																																																	
CS	6-Unprotected ordinary																																																	
CT	7-Protected wood frame																																																	
CU	8-Unprotected wood frame																																																	
CV	9-Not classified above																																																	
CA	0-Undetermined or not reported																																																	
CB	[REDACTED]																																																	
CC	EXTENT OF DAMAGE																																																	
CD	1-Confined to the object of origin																																																	
CE	2-Confined to part of room or area of origin																																																	
CF	3-Confined to room of origin																																																	
CG	4-Confined to the fire-rated comp. of origin																																																	
CH	5-Confined to floor of origin																																																	
CI	6-Confined to structure of origin																																																	
CJ	7-Extended beyond structure of origin																																																	
CK	8-No damage of this type (N/A)																																																	
CL	9-Undetermined or not reported																																																	
CM	0																																																	
CN	FLAME																																																	
CO	1																																																	
CP	2																																																	
CQ	3																																																	
CR	4																																																	
CS	5																																																	
CT	6																																																	
CU	7																																																	
CV	8																																																	
CA	9																																																	
CB	0																																																	
CC	SMOKE																																																	
CD	1																																																	
CE	2																																																	
CF	3																																																	
CG	4																																																	
CH	5																																																	
CI	6																																																	
CJ	7																																																	
CK	8																																																	
CL	9																																																	
CM	0																																																	
CN	DETECTOR PERFORMANCE																																																	
CO	1-Det. in room or space of fire origin - oper																																																	
CP	2-Det. not in rm. or space of fire origin - oper																																																	
CQ	3-Det. in rm. or space of origin - no oper																																																	
CR	4-Det. not in rm. or space of origin - not oper																																																	
CS	5-Det. in rm. or space of fire origin but fire too small to oper.																																																	
CT	6-Not classified above																																																	
CU	7-Not classified above																																																	
CV	8-Undetermined or not reported																																																	
CA	9-No detectors present (N/A)																																																	
CB	[REDACTED]																																																	
CC	SPRINKLER PERFORMANCE																																																	
CD	1-Equipment operated																																																	
CE	2-Equipment should have operated - did not																																																	
CF	3-Equipment pre. but fire too small to oper.																																																	
CG	4-Not classified above																																																	
CH	5-Not classified above																																																	
CI	6-Undetermined or not reported																																																	
CJ	7-No equipment present (N/A)																																																	
CK	[REDACTED]																																																	
CL	TYPE OF MATERIAL GENERATING MOST SMOKE Pg 103-104																																																	
CM	IF SMOKE SPREAD BEYOND ROOM OF ORIGIN																																																	
CN	1-Air handling duct																																																	
CO	2-Corridor																																																	
CP	3-Elevator shaft																																																	
CQ	4-Stairwell																																																	
CR	5-Opening on construction																																																	
CS	6-Utility opening in wall																																																	
CT	7-Utility opening in floor																																																	
CU	8-No avenue of smoke travel (N/A)																																																	
CV	9-Undetermined or not reported																																																	
CA	0-Not classified above																																																	
CB	[REDACTED]																																																	
CC	FORM OF MATERIAL GENERATING MOST SMOKE Pg 108-109																																																	
CD	1																																																	
CE	2																																																	
CF	3																																																	
CG	4																																																	
CH	5																																																	
CI	6																																																	
CJ	7																																																	
CK	8																																																	
CL	9																																																	
CM	0																																																	
CN	IF MOBILE PROPERTY																																																	
CO	AUTOMOBILE																																																	
CP	YEAR																																																	
CQ	2002																																																	
CR	MAKE																																																	
CS	FORD																																																	
CT	MODEL																																																	
CU	ESCAPE																																																	
CV	SERIAL NO.																																																	
CA	[REDACTED]																																																	
CB	IF EQUIPMENT INVOLVED																																																	
CC	YEAR																																																	
CD	[REDACTED]																																																	
CE	MAKE																																																	
CF	[REDACTED]																																																	
CG	MODEL																																																	
CH	[REDACTED]																																																	
CI	SERIAL NO.																																																	
CJ	[REDACTED]																																																	
CK	DATE																																																	
CL	12-7-05																																																	
CM	OFFICER IN CHARGE (if different)																																																	
CN	Capt. E. Crosby																																																	
CO	DATE																																																	
CP	12/7/05																																																	

GRASS, TRASH FIRES,
SHORT FORMCOMPLETE FOR ALL
INCIDENTSCOMPLETE
FOR ALL FIRESCOMPLETE IF
STRUCTURE FIRECOMPLETE IF
STRUCTURE FIRE

Remarks

EQUIPMENT IN CAR IS REASON FOR HIGH DOLLAR LOSS

TOTAL TIME		OFFICE USE		CITY OF EUCLID DIVISION OF FIRE COMPANY INCIDENT REPORT		INCIDENT NO	
TOTAL MILES						LOG PAGE NO. 253	
PRECINCT: EMS		ALARM		CAUSE		DATE: 12/7/05	
ADDRESS: [REDACTED]				***** CHECK ONE *****		SHIFT/STATION: B 11	
BUILDING NAME: residence				REPORTING UNIT		ASSISTING UNIT	
ROUTE TO SCENE: [REDACTED]				RESCUE / ENGINE # 1		RESCUE / LADDER # 1 1 1	
ALARM RECEIVED VIA: 911				DISP. L R		CALL RECEIVED 0553 0553	
ALARM REPORTED AS: car fire				FIRE CO PERSONNEL: OFCRS.: FIREFIGHTERS:		RESPONDING AT later { 0602 0557	
DESCRIPTION OF STRUCTURE: STORY: 2				SITUATION FOUND: car / house fire		ON-SCENE 0607 0559	
EXTENT AND PROGRESS OF FIRE UPON ARRIVAL: vehicle & external of side 2				TYPE OF OCCUPANCY: residence		IN-SERVICE 0626 0643	
CAUSE OF ALARM: car fire				ELAPSED TIME IN MINUTES		33 60	
EQUIPMENT USED: 3 lengths 5 in, bug lights, pike poles, gas light,				ODOMETER		ODOMETER	
				69050		26288	
				MILES 8		MILES 8	
NO. 2-1/2" LINES		FEET OF 2-1/2" HOSE		NO. 1-3/4" LINES		FEET OF 1-3/4" HOSE	
						FEET OF 5" HOSE 300	
NAME OF INSURANCE CO. (BUILDING):				VALUE:		INSURANCE:	
NAME OF INSURANCE CO. (CONTENTS):				VALUE:		INSURANCE:	
NAME OF INSURANCE CO. (VEHICLE):				VALUE:		INSURANCE:	
LOSS:				LOSS:		LOSS:	
OTHER FIRES OUTDOORS:				LOSS:		LOSS:	
In addition to the information above, the Company Officer shall make a narrative written report starting from UPON ARRIVAL; giving a detailed description of the fire and/or of the incident, acts and duties performed by individual members or companies and the method employed in extinguishment, control of the incident and the abatement of hazards. This includes acts of members that are considered to be worthy of mention, citizens and/or fire department members injured or killed, department property lost, damaged, or destroyed, and any other information that might tend to give a complete account of the incident.							
UNIT #		UPON ARRIVAL:					
L-1		L-1 to assist for car / house fire, L-1 secured H ₂ O supply to E-3, L-1 utilities, L-1 overhaul, L-1 checked side 2 exposure, L-1 assisted in clean up, L-1 in service to gas					
		R-1 called to assist after 1st response, R-1 assisted in overhaul R-1 needed for Rescue run →.					
COMPANY OFFICER: and/or MEMBER:		APPROVED BY: SHIFT C.O.				PAGE 1 of 1	



Douglas, Knight & Associates, Inc.
ATTN: Olivia St. John - 41945
P.O. BOX 10517
BRADENTON, FL 34282

Toll Free: 800-359-1975
Phone: 941-744-1039
Fax: 941-744-1202

NOV 10 2006
JS

FORD MOTOR COMPANY
BILL GREER
#3 PARKLANE BLVD SUITE 300
DEARBORN, MI 48126-2568

11/06/2006

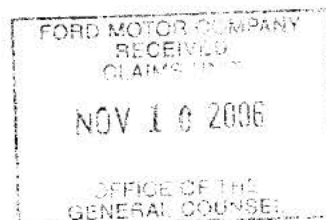
Dear BILL GREER,

YOUR INSURED: FORD MOTOR
COMPANY
YOUR CLAIM NUMBER: UNASSIGNED
OUR CLIENT: [REDACTED]
COMPANIES
OUR CONTROL NUMBER: [REDACTED]
DATE OF LOSS: 7/28/2006
AMOUNT OF CLAIM: 16091.00

Please be advised that we have been engaged by the above captioned client for subrogation as we have been advised that your insured was involved in the above loss with their insured. The information obtained through our investigation places the liability upon your insured for damages sustained to our client's insured. Enclosed you will find supporting documentation.

Please process this claim as soon as possible and mail your draft to the address listed above. Please make your draft made payable to Douglas, Knight & Associates A/S/O [REDACTED] If you have any questions, please feel free to call me at (800) 359-1975.

Sincerely,
Olivia St. John
Subrogation Specialist





Rimkus Consulting Group, Inc.
7201 W. Lake Mead Blvd., Suite 204
Las Vegas, NV 89128
(702) 304-1508 Telephone
(702) 304-1498 Facsimile

August 15, 2006

Jeanie Davis
Horace Mann Insurance Company
PO Box 3388
Houston, TX 77253

Re: Claim No: [REDACTED]
Insured: [REDACTED]
Subject: Fire-Report of Findings
RCG File No: [REDACTED]

Dear Ms. Davis

It was reported that on July 28, 2006, a fire occurred to a 2002 Ford Escape while parked in the insured's garage at [REDACTED] Fort Collins, CO. [REDACTED]. The fire caused heat and smoke damage to the insured's 2007 Ford Escape, another adjacent vehicle, and the garage they were parked in at the time the fire occurred. The Fort Collins Fire Department responded and extinguished the fire. At the time of our inspection the vehicle had not been moved from the garage since the fire.

Rimkus Consulting Group, Inc. was retained on August 1, 2006, by Ms. Jeanie Davis of Horace Mann Insurance Company to perform an origin and cause investigation. Mr. Michael W. Foster, CFI, CFEl, Fire Consultant, was assigned to investigate this fire.

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AUG 21 2006

TRAC 100 PE06-048-0616LC

Conclusions

1. The fire was UNDETERMINED in nature.
2. The area of origin was in the engine compartment on the left side (driver's side) at or near the fire wall.
3. The cause of this fire could not be determined due to the amount of destruction from heat to the area of origin. Many components had been completely consumed by fire.
4. Based on the physical evidence discovered by Rimkus Consulting Group, Inc. the most probable cause of this fire was an electrical fault.

Discussion

On August 2, 2006, Rimkus Consulting Group, Inc. traveled to [REDACTED] Fort Collins, CO [REDACTED], in order to inspect the 2002 Ford Escape. We located the burned vehicle and confirmed its identity. The vehicle was found to be in the same position as it was at the time of the fire, which was, inside the attached garage of the insured's home (**Photograph 1**). We noted that the insured's 2007 Ford Escape Hybrid was parked directly beside the vehicle of origin. The 2007 Escape suffered some minor heat damage to its passenger side view mirror (**Photograph 2**).

Rimkus initiated an exterior examination working in a clockwise rotation beginning at the front bumper of the vehicle (**Photograph 3**). We observed that the engine compartment hood had been opened and folded back against the passenger compartment. We noted that the front grill and headlight assembly area exhibited moderate heat damage. Lower than this area was the bumper, which exhibited no heat damage.

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AUG 21 2006

HMIC - HOUSTON

PE06-048-0617LC

We then examined the passenger's side of the vehicle. The paint and primer had been burned off the front fender on this side. The doors exhibited heat damage with mild discoloration to their paint. Also, the front window was down at the time of the fire. The rear door window exhibited heavy soot stains but was still intact. We noted that the rear fender still exhibited its paint and primer.

Next, we examined the rear of the vehicle (**Photograph 4**). This area evidenced minimal signs of heat damage. All paint and primer was present on this side of the vehicle. Rimkus then examined the driver's side of the vehicle. This side evidenced damage similar to that of the passenger's side. The paint and primer had been consumed from the front fender. Again, like the passenger's side, we observed heat discolored paint on the doors. The front door's window was down while the rear window was up. The rear window exhibited heavy soot stains on the interior

We then began an interior inspection. In order to work methodically from the area of least damage towards the area of most damage, we began our inspection in the rear of the vehicle (**Photograph 5**). We found that this area evidenced minimal signs of heat damage. The fabric of the rear center console had been burned on its front side. Also, the portion of the seat's fabric nearest the front of the vehicle had been consumed. These heat travel indicators evidenced the fire had moved into the back seats from the front seats

Rimkus then examined the front seat area of the passenger compartment (**Photograph 6**). This area exhibited greater heat damage than that of the rear seats. The fabrics of the seats had been consumed. Heat had begun to attack the seat foam before extinguishment. Rimkus observed that the driver's side evidenced a greater extent of fire attack than did the passenger side. We also noted the windshield had failed, due to heat stress, and was lying on the front floor boards. We determined, based on heat travel indicators, that the fire had moved into the passenger compartment from the engine compartment.

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PE06-048-0018LC

Rimkus then initiated an examination of the engine compartment. We noted that the engine compartment hood exhibited a dark discoloration and heavy oxidation on its exterior and its underside (**Photographs 7 and 8**). This area on the hood corresponded with the more extensive damage we found in the passenger's compartment's driver's side.

We then examined the interior of the engine compartment (**Photograph 9**). This area evidenced widespread heat damage. Rimkus observed that the driver's side area near the fire wall exhibited a more intense burn than that of other areas (**Photograph 10 and 11**). This location directly corresponded to the aforementioned area on the hood.

Although they had been consumed in this fire, this would have been the location of the vehicle's battery, power train control module (PCM), and the brake system's master cylinder. There were also various circuits that traveled through this area. Some of these circuits evidenced faulty electrical activity such as arcing and beading. Without further inspection by a forensic electrical engineer, we were unable to conclusively determine whether this electrical activity was a cause of the fire or a result of heat attack. We discovered that many of the components in this area had been completely destroyed by fire. Based on heat travel indicators and the amount of destruction and the near complete consumption of combustibles in this localized area, we determined that this was the area of origin.

Analysis

In our opinion, after a careful review of the facts surrounding this fire, we believe that the cause of this fire was UNDETERMINED in nature. The area of origin was in the engine compartment on the left side (driver's side) at or near the fire wall. The cause of this fire could not be determined due to the amount of destruction from heat to the area of origin. Many components had been completely consumed by fire. Based on the

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AUG 21 2006

PE06-048-0619LC

August 15, 2006

RCG File No. [REDACTED]

Page 5

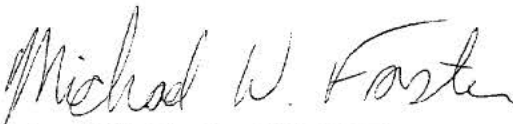
physical evidence discovered by Rimkus Consulting Group, Inc. the most probable cause of this fire was an electrical fault.

This report was prepared for the exclusive use of Horace Mann Insurance Company and was not intended for any other purpose. Our report was based on the information available to us at this time and described in the **Basis of Report**. Should additional information become available, we reserve the right to determine the impact, if any, the new information may have on our opinions and conclusions and to revise our opinions and conclusions if necessary and warranted.

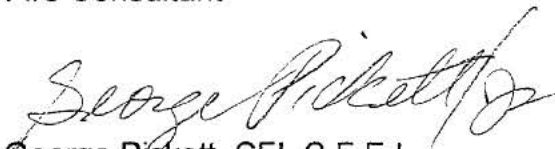
Thank you for allowing us to provide these services. If you have any questions or need additional assistance, please call.

Sincerely,

RIMKUS CONSULTING GROUP, INC.



Michael W. Foster CFI, CFEI
Fire Consultant



George Pickett, CFI, C.F.E.I.
Western Regional Fire Manager

Attachments: Basis of Report, Photographs, CVs

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AUG 21 2006

HMIC - HOUSTON

PE06-048-0620LC

August 15, 2006

RCG File No. [REDACTED]

Basis of Report

1. We conducted a visual inspection of the exterior and interior of the vehicle on August 2, 2006.
2. We performed debris removal in the area of origin on August 2, 2006.
3. We reconstructed the area of origin to what we believe to be pre-fire condition on August 2, 2006.
4. We reviewed NFPA 921 Guide for Fire and Explosion Investigations, 2004 Edition.
5. We photographed the vehicle and studied the pictures post inspection for more information regarding this fire.
6. We examined recalls for this vehicle.
7. We examined schematics, diagrams, and repair information for this vehicle.

RECEIVED

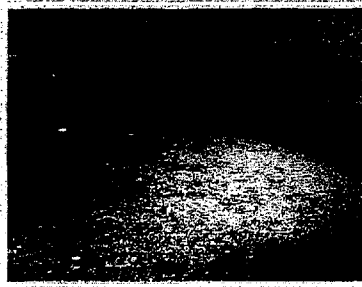
AUG 21 2006

LMIC - HOUSTON

PE00-048-0021LC



RT. REAR



ROOF DAMAGE FROM
THE RT. FT.



LT. FT. DOOR INSIDE



FT. DASH AND
STEERING WHEEL
DAMAGE



LT. REAR



ENGINE COMPARTMENT



REAR INSIDE FROM THE
FT.



RT. FT. DOOR AREA



LT. FT.



FT. ENGINE
COMPARTMENT



RT. FT.



RT. FT.

August 15, 2006

RCG File No. [REDACTED]

Photograph 1



Photograph 2



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AUG 21 2006

HMIC - HOUSTON

PE06-048-0624LC

August 15, 2006

RCG File No. [REDACTED]

Photograph 3



Photograph 4



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AUG 21 2006

HMIC - HOUSTON

PE06-048-0625LC

August 15, 2006

RCG File No. [REDACTED]

Photograph 5



Photograph 6



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AUG 21 2006

HMIC - HOUSTON

PE06-048-0626LC

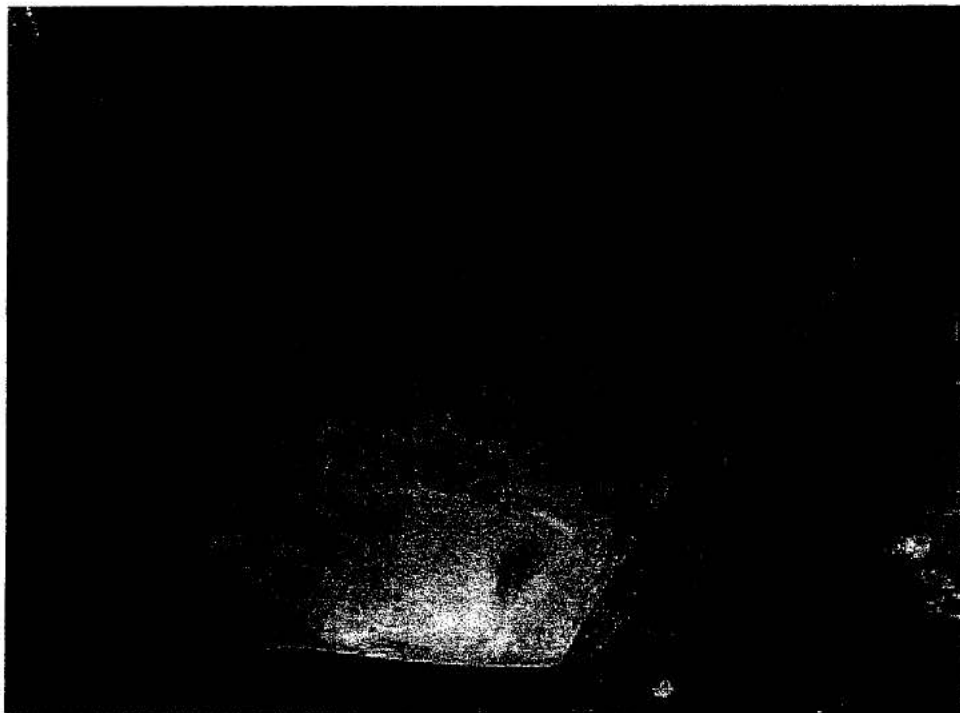
August 15, 2006

RCG File No. [REDACTED]

Photograph 7



Photograph 8



RECEIVED

AUG 21 2006

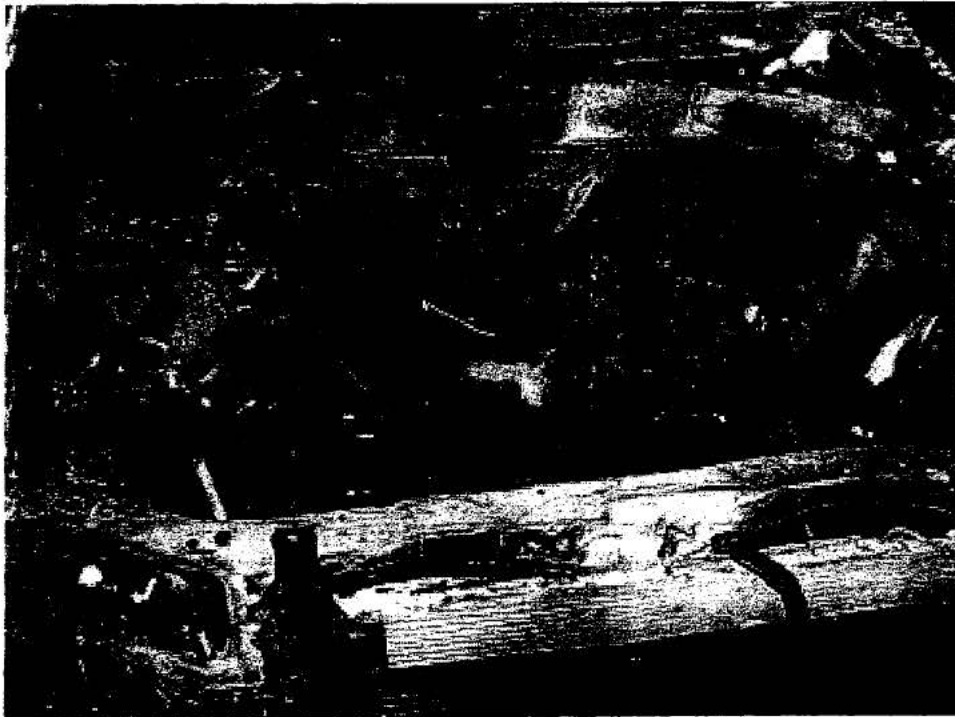
HMIC - HOUSTON

PE06-048-0627LC

August 15, 2006

RCG File No. [REDACTED]

Photograph 9



Photograph 10



RECEIVED

AUG 21 2006

HMIC - HOUSTON

PE06-048-0628LC

August 15, 2006

RCG File No. [REDACTED]

Photograph 11

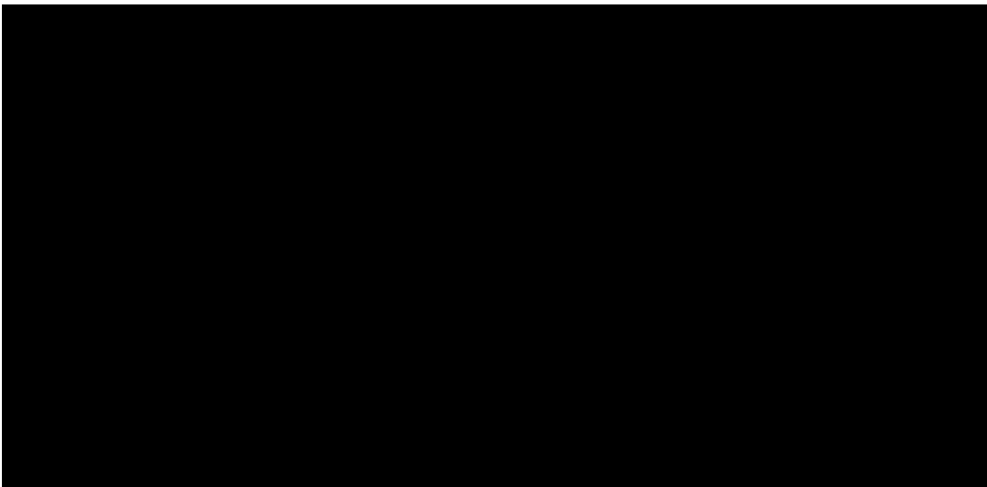


RECEIVED

AUG 21 2006

HMIC - HOUSTON

PE06-048-0629LC





THE STANDARD FIRE INSURANCE COMPANY
DEBRA M HAMILTON
PO BOX 3022
FALL RIVER MA 02722-3022
(800) 925-7693 X 2614
(508) 676-2614

NOV 20 2006


November 7, 2006

T 11/27

ATTN CONSUMER AFFAIRS
FORD MOTOR COMPANY
16800 EXECUTIVE PLAZA

DEARBORN MI 48126

Our Client: [REDACTED]
Claim/File #: [REDACTED]
Date of Loss: 07/04/2006
Your Insured: self
Your File #: n/a
Reference: Subrogation Claim

Dear claimant

We are managing a claim on behalf of [REDACTED], who sustained damages on 07/04/2006. Our investigation of the incident shows that your insured is liable for damages.

We have made payments of \$13,137.31 for this loss. We are requesting reimbursement for that amount and [REDACTED] deductible of \$250 for a total of \$13,387.31.

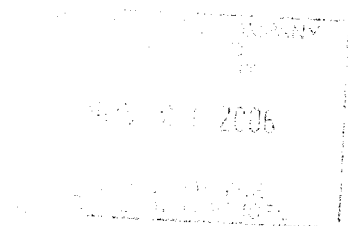
We expect payment within 30 days and we will forward the deductible amount to [REDACTED]
[REDACTED]

We appreciate your prompt attention.

Fire loss, please call me to set up an appointment for your investigators to view the vehicle.

Sincerely,
DEBRA M HAMILTON
Claim Representative
(508) 676-2614

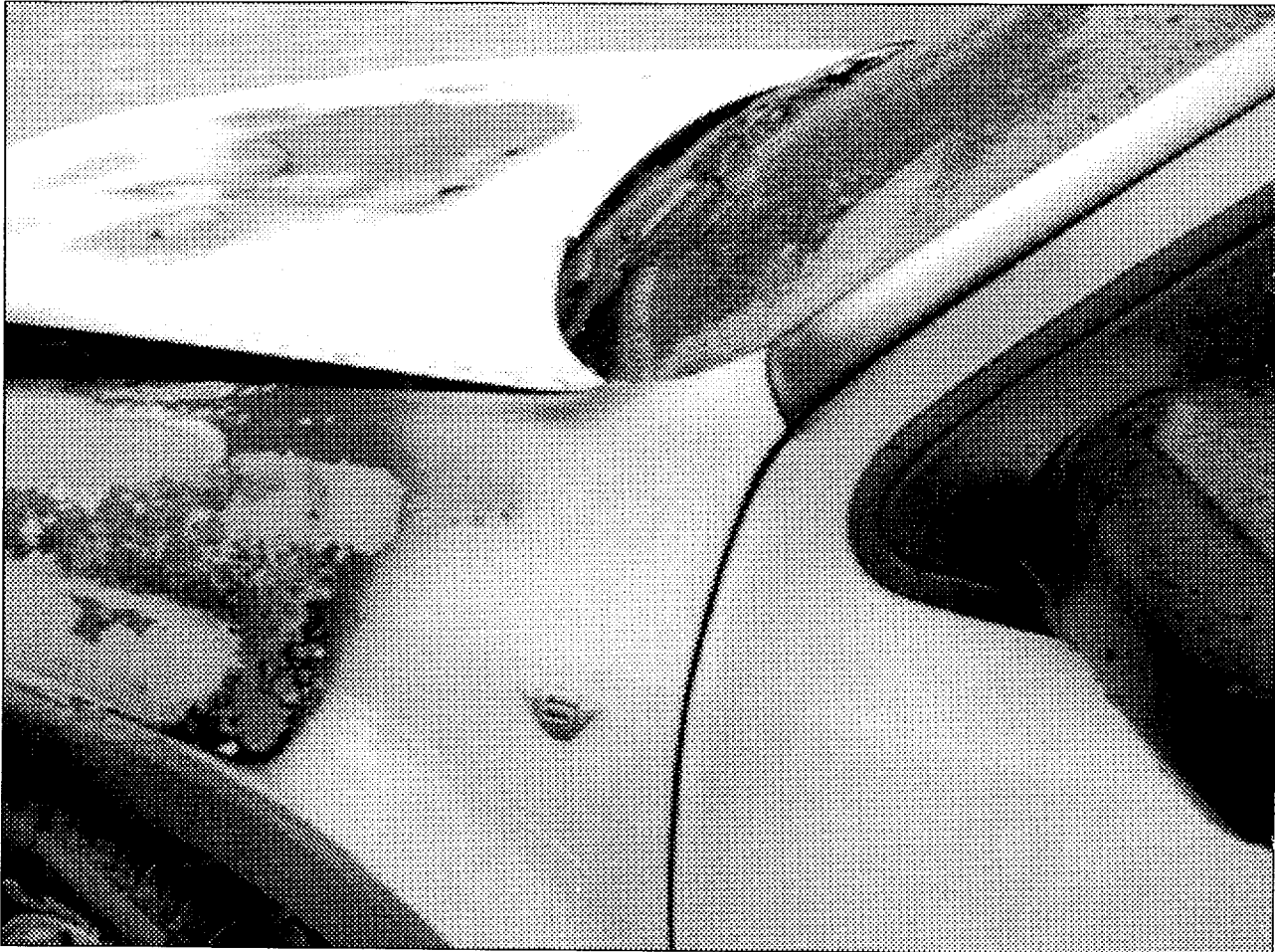
Fax:
Email:



DESCRIPTION:

UNKNOWN

IMPORTED: 7/6/2006 11:08:50 AM **BY:** gbrown2 **FILE SIZE:** 44523 **WIDTH:** 640 **HEIGHT:** 480



 TRAVELERS

DESCRIPTION:

UNKNOWN

IMPORTED: 7/6/2006 11:11:34 AM **BY:** gbrown2 **FILE SIZE:** 73955 **WIDTH:** 640 **HEIGHT:** 480



 TRAVELERS

Spartanburg Public Safety Department

Fire Division

"Preservation Through Prevention"

Incident Confirmation Report

The following information is provided as confirmation of an incident occurring within the jurisdiction of the Fire Division. The information contained herein is subject to change without notice.

Incident summary:

Incident Description:

Passenger vehicle fire

Address:

SPARTANBURG, SC

Officer in charge:

CAPTAIN Horton, Dale Leon

Incident number:

Date and time:

Alarm: 07/04/2006 1:46:42 PM

Arrival: 07/04/2006 1:50:37 PM

Member making report:

SERGEANT Frec, David Belton

Vehicle information (if applicable):

Make and model:

FO ESCAPE

Year:

2002

License (state and #):

VIN (if available):

1FMYU4112K

Owner and/or occupant information available at time of incident:

PAULINE, SC

151 South Spring St.
Spartanburg, SC 29306

Date and time report printed:
07/06/2006 2:26 PM

Phone: (864)596-2083
Fax: (864)596-2263



BOLDEN & ASSOCIATES
ATTORNEYS AT LAW

10 Federal Street, Suite 210 - Salem, Massachusetts - 01970

Bryan C. Bolden
Timothy W. Chopelas
Madelene Pretorius
Laurie B. McGhee*
Christopher S. M. Driscoll
Stefano J. Cornelio
Leo M. Spano
Joseph P. Bonfiglio

(978) 744-2162
Fax (978) 744-6705

Wendy R. Olinsky**
Of Counsel

*(Also admitted in N.Y.)
**(Also admitted in N.H.)

November 17, 2006

NOV 21 2006


Office of the General Counsel
Ford Motor Company
Parkland Towers West, Suite 300
Three Parkland Blvd.
Dearborn, MI 48126-2568

RE:

[REDACTED]

VS: Ford Motor Co.

FILE NO:

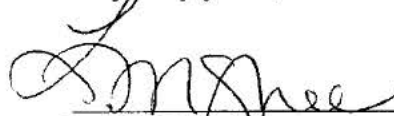
[REDACTED]

DOI: August 6, 2006

Dear Sir Or Madam:

Please be advised that this office represents the [REDACTED] On August 6, 2006, a 2002 Ford Escape belonging to [REDACTED] was parked and shut off when it caught on fire. [REDACTED] paid its insured the amount of \$2,446.84 for damages incurred by her for which it now stands subrogated to the rights and causes of said payments. According to the Fire Department investigation, the fire originated in the wire harness connector to the brake system. Enclosed is a copy of this report as well as other documents in support of this claim. It is my understanding that the U.S. Dept. of Transportation has received other complaints of Ford Escape fires originating in the engine compartment at or near the ABS control module and is currently conducting an investigation. Please contact me to discuss settlement of this claim.

Very truly yours,


Laurie B McGhee

LBM/jn
Enclosures

NOV 22 2006


PE06-048-0636LC

January

Report of Claim

Claim No. [REDACTED]



Date of accident

August 6, 2006

Time

4:00 P.M.

Place of accident

[REDACTED]

Name of insured

[REDACTED]

Age

42

Address

[REDACTED]

Day time Phone No.

[REDACTED]

Description of car make

Ford Escape

Year

2002

Body

Black

Registered owner

[REDACTED]

Age

42

Address

as above

Phone

[REDACTED]

Name of driver

N/A

Age

N/A

Address

N/A

Phone

N/A

Driver's employer

N/A

Address

N/A

Phone

N/A

List passengers in car with ages and addresses

N/A

N/A

Name of owner of other car involved

N/A

Address

N/A

Description of other car make

N/A

Year

N/A

Body

N/A

License No.

N/A

Name of driver of other car

N/A

Address

N/A

Age

N/A

Information on your vehicle

Electrical wiring and brakes

What parts of your car were damaged?

Arbella → Robinson Insurance Agency

In what company do you carry automobile insurance?

Name of your insurance agent

Craig Lawson

Policy No.

Where you in the course of your employment at the time of the accident?

NO

Were you on an errand of the registered owner?

NO

Were you injured?

NO

Was anyone else injured?

NO

If anyone was injured please give name, address and age

N/A

Nature of injuries

N/A

Name of any hospital at which you were seen

N/A

Name and address of your doctor

N/A

State how accident happened

The car was parked in our driveway. We were in the house. My Husband looked out the window and saw flames coming out of the hood of my car. My husband grabbed the fire extinguisher and went outside and put out the fire. We called the fire department to examine the car.

Who do you believe caused the accident? Why?

no-one. Because no one was driving it at the time

Did the police come to the scene?

Yes

What citations were issued?

NO

Signature

[REDACTED]

8/8/06

Date

NOTE: Important state information on reverse side.

Use other side for diagram and further details.

PE06-048-0637LC

Description of accident

What was your speed when you first saw the other vehicle?

NIA

What was the other vehicle's speed?

NIA

How far away was it when first seen?

NIA

Did you reduce speed of your car?

NIA

Other car?

What signal, if any, did you give?

Other driver?

Was it day light?

yes

If not day light was place of accident well lighted?

What lights were burning on your car?

Other car?

What was condition of street or pavement?

NIA

Weather

8/6/06

Your signature

Address

Date

Witnesses — Give name and addresses of all persons who witnessed or can furnish information about accident

Name

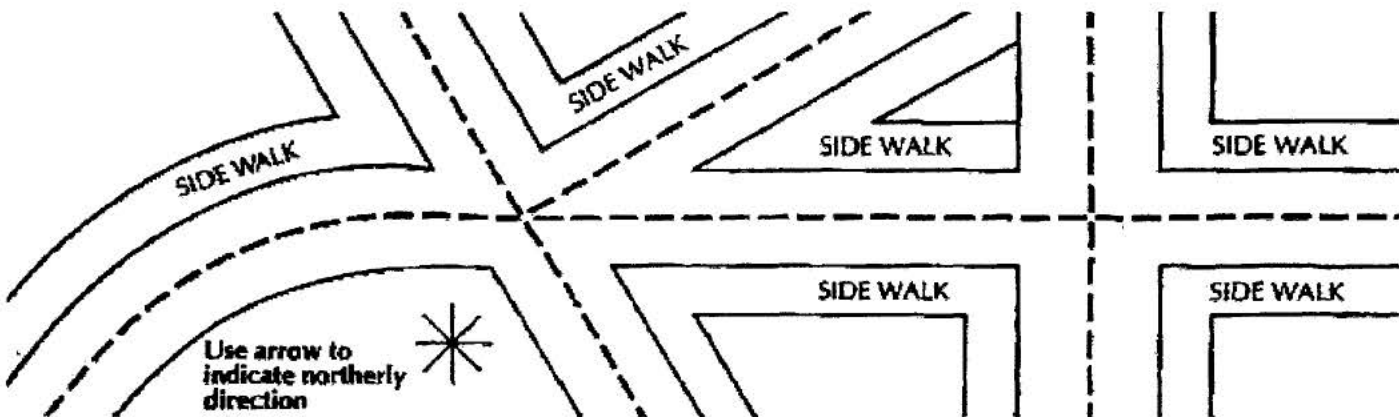
Street, City, State, Zip code

Home telephone

Business telephone

Diagram of accident

IMPORTANT — Please fill in diagram printed below, showing position of automobile and injured person (or other vehicle with which insured's automobile collided) with direction in which both were proceeding.



Indicate location of traffic controls — such as signals, signs, lights, police markers, etc.

DRIVE WAY
car
my house



WALTHAM FIRE DEPARTMENT
WALTHAM, MA

NFIRS Incident # [REDACTED]

FDID	State	Incident Date	Station	Incident Number	Exposure	Report Status
17308	MA	08/06/2006		[REDACTED]	0	APPROVED

Address				
Location Type	STREET ADDRESS		Census Tract	
St. Prefix	St. Number	St. Name	St. Type	St. Suffix
	[REDACTED]			
Apt. Number	Cross Street or Directions			
	City	State	Zip	
	WALTHAM	MA	[REDACTED]	

Incident Details				
C: Incident Type	E1: Dates & Times		E2: Shifts & Alarms	
131 PASSENGER VEHICLE FIRE	Date/Time		Shift/Platoon	Alarms District
D: Aid Given/Received	(mm/dd/yyyy hh:mm:ss)		1	1 E-7
	Alarm	08/06/2006 17:16:19	Special Study ID#	Special Study Value
Mutual Aid (FDID) Agency - State	Arrival	08/06/2006 17:22:10		
() -	Controlled		Incident Under Investigation	N
	Last Unit Cleared	08/06/2006 17:31:40		

E: Actions Taken	G1: Resources		G2: Estimated Dollar Losses & Values	
Primary Action	Apparatus Personnel		LOSSES:	
86 INVESTIGATE	Suppression	1 3	Property \$	
	EMS	0 0	Contents \$	
	Other	1 2	PRE-INCIDENT VALUE:	
			Property \$	
			Contents \$	

H1: Casualties			H3: Hazardous Materials Release	
	Deaths	Injuries		
Fire Service	0	0		
Civilian	0	0		

H2: Detector
I: Mixed Use Property
J: Property Use
938 GRADED AND CARED-FOR PLOTS OF LAND

K1: Person/Entity Involved
No Persons Involved/ Involved Person data not entered

K2: Owner				
Business Name			Phone Number	
Prefix	First Name	MI	Last Name	Suffix
St. Prefix	St. Num	St. Name	St. Type	St. Suffix
	Apt. Number	P.O. Box		
	City		State	Zip
			MA	

L: Remarks
See Company Run Report

M: Authorization				
Approved By	Approver Name	Position	Assignment	Date
4926	QUINN, M	DEP CH		08/06/2006 21:58:44
Officer in-Charge	Officer Name	Position	Assignment	Date
4926	QUINN, M	DEP CH	C-2	08/06/2006 18:17:41
Member ID	Member Name	Position	Assignment	Date
2795	UPHAM, R	CAPT	E-3	08/06/2006 17:57:35

Fire Form

Property Information

B: Property Details

B1: Estimated Number of living units in building of origin
Not residential
B2: Number of buildings involved
Building not involved
B3: Acres burned
None

C: On-Site Materials or Products
None

D: Ignition	E1: Cause of Ignition
D1: Area of fire origin	This is an exposure report 3 FAILURE OF EQUIPMENT OR HEAT SOURCE
83 ENGINE AREA, RUNNING GEAR, WHEEL AREA	
D2: Heat Source	E2: Factors Contributing To Ignition
10 HEAT FROM POWERED EQUIPMENT, OTHER	None
D3: Item first ignited	
81 ELECTRICAL WIRE, CABLE INSULATION	
D4: Type of material first ignited	
41 PLASTIC	

E3: Human Factors Contributing to Ignition
None

F1: Equipment Involved in Ignition	G: Fire Suppression Factors
None	None

H1: Mobile Property Involved				
Involved in ignition and burned				
H2: Mobile Property Type & Make				
Type	10 PASSENGER ROAD VEHICLE, OTHER			
Make	FO FORD			
Model	ESCAPE	Year	2002	
Lic. Plate Number	649-CCP	State	MA	VIN 1FMYU03152K [REDACTED]

Company Reports

Agency	Incident Number	Exposure	Unit ID	Report Number
WAL-FD	[REDACTED]	0	C2	1

Apparatus	
Apparatus Type	Apparatus Use
(92) CHIEF OFFICER CAR	(1) SUPPRESSION

Response Address				
St. Prefix	St. Num	St. Name	St. Type	St. Suffix
	70	HOLLACE ST	STREET	
	Apt. Number			

	City	State	Zip
	WALTHAM	MASSACHUSETTS	02453
Cross Street			

Dispatch Time	Arrival Time	Cleared Time
08/06/2006 17:18:29	08/06/2006 17:23:07	08/06/2006 17:31:40

Situation Found	48 VEHICLE FIRE
Hydrant Location	
Hydrant Condition	
Hydrant Damaged	No

Actions Taken
80 INFORMATION, INVESTIGATION & ENFORCEMENT, OTHER

Equipment Used			
Type	Qty.	Measurement	Notes

Company Members Responding				
ID	Name	Rank	Acting	Actions Taken
4926	QUINN, M	DEP CH	No	1) INFORMATION, INVESTIGATION & ENFORCEMENT, OTHER 2) INCIDENT COMMAND
4336	BOWER, T	FF	No	

Report Narrative
On C2s arrival we had a all out auto fire. Fire was contained to wiring in the engine compartment. 2002 Ford Escape color black, Reg. # 649-CCP, VIN # 1FMYU03152K [REDACTED] OWNER-- [REDACTED] Waltham, Tel # [REDACTED] INS. Co. [REDACTED] DAMAGE- to wiring in engine compartment PROBABLE CAUSE- short circuit in wiring.

Filed By	
Member ID	Member Name

4926 QUINN, M

Agency	Incident Number	Exposure	Unit ID	Report Number
WAL-FD	6004102	0	E3	1

Apparatus	
Apparatus Type	Apparatus Use
(11) ENGINE	(1) SUPPRESSION

Response Address				
St. Prefix	St. Num	St. Name	St. Type	St. Suffix
	70	HOLLACE ST	STREET	
	Apt. Number			
	City	State	Zip	
	WALTHAM	MASSACHUSETTS	02453	
Cross Street				

Dispatch Time	Arrival Time	Cleared Time
08/06/2006 17:16:50	08/06/2006 17:22:10	08/06/2006 17:31:33

Situation Found	4 ALL-OUT FIRE
Hydrant Location	
Hydrant Condition	
Hydrant Damaged	No

Actions Taken
86 INVESTIGATE

Equipment Used			
Type	Qty.	Measurement	Notes
ASSORTED TOOLS	1	OTHER MEASURE UNITS	PERSONAL PLIERS

Company Members Responding				
ID	Name	Rank	Acting	Actions Taken
2795	UPHAM, R	CAPT	No	
221	HOUSTON, T	FF	No	

5996	CRANE, M	FF	No	1) INVESTIGATE
------	----------	----	----	----------------

Report Narrative

Engine #3 responded to #70 Hollace Street for an initial report of a vehicle fire. Car #2 Deputy Mike Quinn responded and cancelled the response of Ladder #1 in route. Prior to Engine #3 arrival Waltham Fire Alarm reported the fire had been extinguished by someone on scene. Upon arrival Engine #3 personnel investigated. The vehicle was a Ford Escape XLT with Mass. Registration #649 CCP. The vehicle owner on scene was Jeanie Foley - Kass. The engine compartment fire reportedly was extinguished by her husband [REDACTED] using a fire extinguisher. The all out fire appeared to have been located in a wire harness connector to the brake system. Engine #3 F.F. Mike Crane disconnected a battery terminal for safety prior to leaving the scene.

Filed By

Member ID	Member Name
2795	UPHAM, R

Agency	Incident Number	Exposure	Unit ID	Report Number
WAL-FD	[REDACTED]	0	L1	1

Apparatus

Apparatus Type	Apparatus Use
(12) TRUCK OR AERIAL	(1) SUPPRESSION

Response Address

St. Prefix	St. Num	St. Name	St. Type	St. Suffix
	70	HOLLACE ST		
	Apt. Number			
	City	State	Zip	
	WALTHAM	MASSACHUSETTS	02452	
Cross Street				

Dispatch Time	Arrival Time	Cleared Time
08/06/2006 17:16:50		08/06/2006 17:20:16

Situation Found	55 DID NOT RESPOND
Hydrant Location	
Hydrant Condition	
Hydrant Damaged	No

Actions Taken

93 CANCELLED ENROUTE

Equipment Used

Type	Qty.	Measurement	Notes
------	------	-------------	-------

Company Members Responding

ID	Name	Rank	Acting	Actions Taken
1637	PRATT, T	LT	No	1) CANCELLED ENROUTE
1469	LENNON, M	FF	No	
4117	ANDERSON, D	FF	No	

Report Narrative

L1 was cancelled before arrival by C2.

Filed By

Member ID	Member Name
1637	PRATT, T

Date: 8/17/2006 07:03 PM
 Estimate ID: 000861180
 Estimate Version: 0
 Commitment
 Profile ID: Massachusetts Tax

ARBELLA INSURANCE GROUP

ONE TECHNOLOGY DRIVE P.O. BOX 5191, WESTBORO, MA 01581-5191
 (508) 616-2601
 Fax: (508) 616-2690

Damage Assessed By: Gary Butkus Lic. # 12027

Claims Handler: [REDACTED]

Condition Code: Good
 Date of Loss: 8/6/2006
 Deductible: UNKNOWN
 Claim Number: [REDACTED]

Type of Loss: Comprehensive
 Date Assign: 8/7/2006

Insured: [REDACTED]
 Claimant: [REDACTED]
 Address: [REDACTED] WALTHAM, MA [REDACTED]
 Telephone: Work Phone: [REDACTED]
 Owner: [REDACTED]

Home Phone: (781) 338-4104

Mitchell Service: 917626

Description: 2002 Ford Escape XLT
 Body Style: 4D Ut
 VIN: 1FMYU03152R [REDACTED]
 Mileage: 40,800
 OEM/ALT: A
 Color: BLACK
 Options: ALUM/ALLOY WHEELS, CRUISE CONTROL, AUTOMATIC TRANSMISSION

Drive Train: 3.0L Inj 6 Cyl 2WD

Search Code: 02269

Line Item	Entry Number	Labor Type	Operation	Line Item Description	Part Type/Part Number	Dollar Amount	Labor Units
1	701562	MCH	REMOVE/REPLACE	ABS CONTROL MODULE -M	New	428.78 *	INC*
2	703259	MCH	REMOVE/REPLACE	ABS CONTROL UNIT -M	New	362.64 *	INC*
3	900500	MCH*	REMOVE/REPLACE	WIRING HARNESS	New	751.40 *	INC*
4	900500	MCH*	REMOVE/REPLACE	SUBLET LABOR 10.5 X \$75.00	New	787.50 *	INC*

* - Judgment Item

Remarks

ASSIGNED ON 8/7 WENT TO INSURED'S HOME
 ON 8/8 SPOKE WITH OWNER'S HUSBAND WHO SHOWED
 ME DAMAGE. UNABLE TO DETERMINE WHAT
 WAS DAMAGED AT THIS TIME. ADVISED TO
 HAVE CAR BROUGHT TO WHERE THEY WERE
 GOING TO HAVE REPAIRS DONE. SHOP CALLED
 ON 8/11 WENT TO SHOP ON 8/14. NOTHING HAD
 BEEN DONE. EXPLAINED TO DEALER TO DIAGNOS
 AND CALL. SHOP CALLED ON 8/16. WENT TO
 SHOP ON 8/17 SEE PHOTOS
 AGREED ON \$75.00 LABOR RATE

ESTIMATE RECALL NUMBER: 8/17/2006 18:57:29 000861180

Mitchell Data Version
 UltraMate Version

JUL_06_V
 6.0.016

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Page 1 of 2

PE06-048-0646LC

Date: 8/17/2006 07:03 PM
 Estimate ID: [REDACTED]
 Estimate Version: 0
 Committed
 Profile ID: Massachusetts Tax

I. Labor Subtotals	<u>Units</u>	<u>Rate</u>	<u>Add'l Labor Amount</u>	<u>Sublet Amount</u>	<u>Totals</u>	II. Part Replacement Summary	<u>Amount</u>
Labor Summary	0.0				0.00	Taxable Parts	2,330.32
						Sales Tax (at 5.000%)	116.52
						Total Replacement Parts Amount	2,446.84
					<u>Amount</u>	IV. Adjustments	<u>Amount</u>
I. Additional Costs					0.00	Customer Responsibility	0.00
Total Additional Costs							
						I. Total Labor	0.00
						II. Total Replacement Parts	2,446.84
						III. Total Additional Costs	0.00
						Gross Total:	2,446.84
						IV. Total Adjustments:	0.00
						Net Total:	2,446.84

Company: TOWNSBURY CLAIMS OFFICE

Inspection Site: OWNER'S HOME/DEALER
 WALTHAM, MA
 Inspection Date: 8/17/2006

Body Shop: WALTHAM FORD

THIS IS NOT AN AUTHORIZATION FOR REPAIR.

This appraisal was prepared and sworn to under the penalties of perjury.

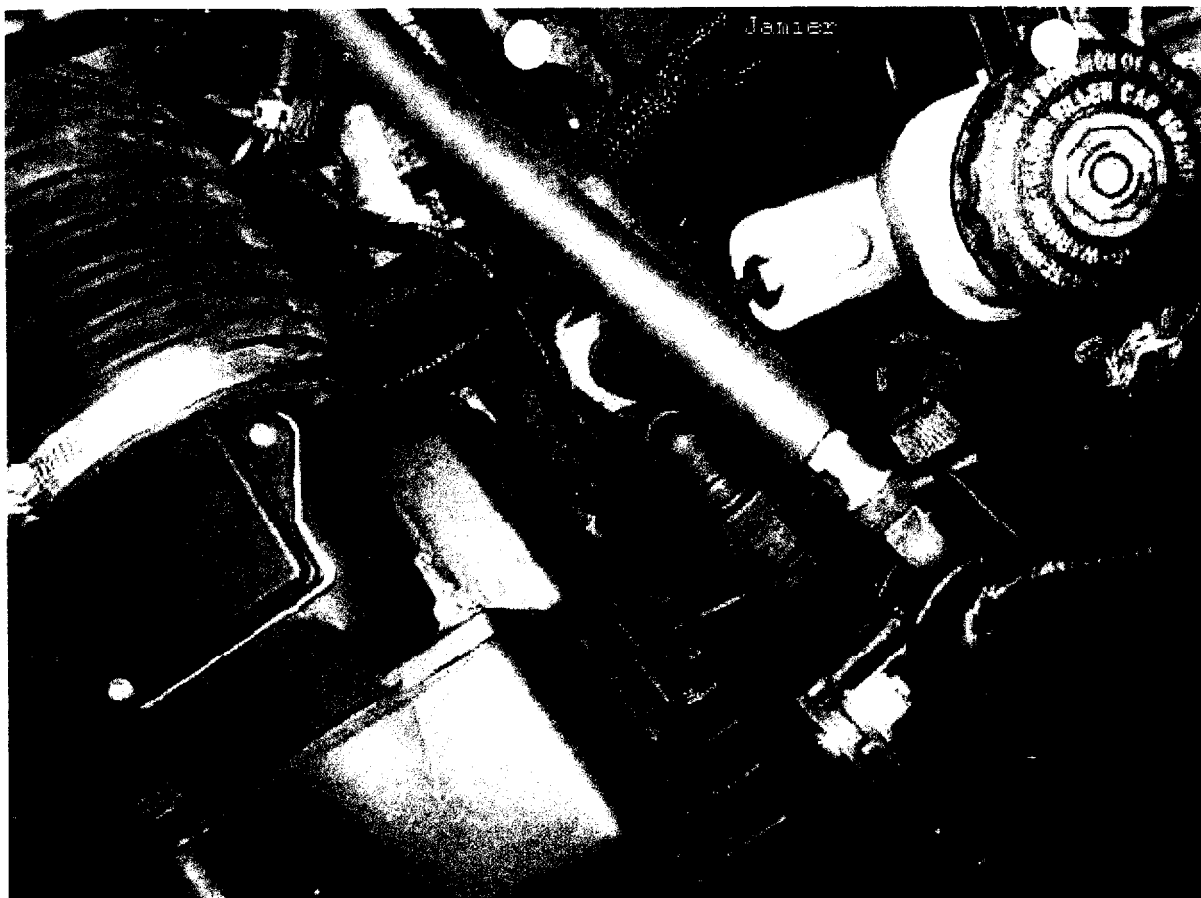
ADDITIONAL DAMAGE CALL GARY BUTKUS: 1-800-442-1156 X-7748

Deductible, betterment, and previous damage, if included in this estimate, will be deducted from any settlement agreement with the owner.

NOTHING IS TO BE CHARGED TO ARBELLA MUTUAL INSURANCE COMPANY.

NO SUPPLEMENTS PAID WITHOUT PRIOR APPROVAL.





PE06-048-0650LC