





RQ09-002 0308LC



KEMPER AUTO AND HOME
CLAIMS ADMINISTRATION

P.O. BOX 7768
CHARLOTTE, NC 28241-7768

Fax 704/423-6000
704/423-6001
800/464-5108

4
Subro

CUSTOMER RELATIONSHIP CENTER
C/O FORD MOTOR CO
P O BOX 6248
DEARBORN MI 48126



January 2, 2008

Claim #: [REDACTED]
Date of Loss: December 24, 2007
Insured: [REDACTED]
Other: [REDACTED]
Office Use: F501

T/1/29

Our preliminary investigation indicates that you may be responsible for damages to our insured's property as a result of an accident on the above date. If further investigation substantiates that you are liable, either you or your insurance company will be responsible for reimbursing us for any reasonable payment as a result of this accident.

If you have liability insurance for this accident, please provide the information below and return this letter in the enclosed envelope so that we can contact your insurance company. If you do not have liability insurance for this accident, you may be responsible for reimbursement.

Your cooperation in furnishing this information will assist us in finding a solution satisfactory to both you and our insured.

Our insured's vehicle had a fire in the engine compartment area. We are inspecting at this time. The VIN is 1FMYU041423 [REDACTED] for a 2002 Ford Escape. Please have your correct department to contact us. Thanks

Your agent's name: _____

Phone number: _____ Your policy number: _____

Name of insurance co.: _____

Mailing address of your insurance co.: _____

Have you reported this accident to your company? _____

If so, please provide your claim number _____ and

adjuster's name _____

Signed: _____

Date: _____

Unitrin Auto and Home Insurance Company

Debra Feaster Anderson
Claim Department

cc: Claim File

B JAN -7 PM 2:24

COMMUNITY AFFAIRS
ON



BEGINNING OF CONTACT
11/14/2008

VOICE OF THE CUSTOMER TRACKING SYSTEM

08.00.05

REGION: N2 BOSTON OGC ISSUE CASE NBR: 0664043188
VIN: 1FMYU03191K ZONE: A04 OPENED: 11/13/2008
ENGINE: 1 VEH TYPE: T CLOSED: 11/13/2008

LAST NAME: [REDACTED] STATUS: CLOSED
TITLE: [REDACTED] MI: M
ADDRESS: [REDACTED] FIRST NAME: [REDACTED]
CITY: BOZRAH STATE: CT ZIP: 06334
HOME PHONE: [REDACTED]
MODEL YEAR: 2001 MODEL: ESCAPE XLT 4X2
MILEAGE: 125000
DEALER NAME: VALENTI FORD, INC. SALES CODE: F11420 P & A: 09016
REASON CODE: 0792 LEGAL - ACCIDENT / FIRE
SYMPTOMS: 704100 FIRE/SMOKE VISIBLE FLAME

ORIGIN: CACI38 - US CONCERN CASE BASE COMMUNICATION: PHONE
ACTION: 792 - CONTACT ADVANCED TO OGC - FIRE
DOCUMENT: ANALYST: HNABB HEATHER NABB (HNABB)

DATE: 11/13/2008 TIME: 18.26.43:
ACTION DATA/COMMENTS:

CUSTOMER SAID: -HAD AN ISSUE WITH VEH OF FORDS-FEW WEEKS AGO
, WENT UP IN FLAMES-BROTHER-IN-LAW LOOKED IT UP AND SAW THERE
WAS RECALL SENT IN 2007 TO OWNERS OF THE VEH AFFECTED-NEVER
RECEIVED NOTICE-NOTHING BY DLRSHIP THAT SOLD VEH AND NO LETTER
RECEIVED TO CUST AT ALL-LOST TOTAL VEH-WANT TO KNOW WHY
NEVER RECEIVED LETTER-ALSO WAS NEVER TOLD BY DLRSHIP HAD RECALL
ON VEH AND TOOK VEH THERE FOR EVERY OIL CHANGE--FIRE---DATE:
OCTOBER 2008-ORIGINATED: ELECTRICAL FIRE-FIRE REPORT WAS
FILED-WAS TOLD COULD NOT IDENTIFY ANYTHING BECAUSE VEH WAS
TOTALLED-FIRE REPORT NUMBER UNAVAILABLE-NO OTHER DAMAGES TO ANY
THING ELSE BUT VEH-DID FILE CLAIM WITH INSURANCE-NOTHING COULD
BE PAID BECAUSE DID NOT HAVE FULL COVERAGE-STATUS WITH INSURANCE
COMPANY IS CLAIM CLOSED BECAUSE THEY COULD NOT DO ANYTHING FOR
CUST-NOT REPAIRABLE-VEH WAS NOT RUNNING***SEEKING*** IF THERE IS
ANY DAMAGE THAT CUST CAN COLLECT FROM THIS FIREDEALER SAID:
VALENTI FORD72 JERRY BROWNE ROAD MYSTIC, CT 06355TEL:(800) 699-2571
CRC ADVISED: I WILL FORWARD YOUR INFORMATION TO FORD'S OFFICE OF THE
GENERAL COUNSEL. YOU SHOULD RECEIVE A WRITTEN RESPONSE WITHIN 15
BUSINESS DAYS TO YOUR CONCERN.***NOTE TO CSR: PLEASE REMEMBER TO
VERIFY ALL CUSTOMER CONTACT INFORMATION BEFORE SENDING ISSUE.***
ADVISED CUST OF ABOVE***



February 21, 2008

[REDACTED]
Salem, WV
[REDACTED]

FORD MOTOR COMPANY
RECEIVED
CLAIMS UNIT

FEB 26 2008

OFFICE OF THE
GENERAL COUNSEL

T 2/24

Ford Motor Company
Claims Dept.
P.O. Box 70
Dearborn, MI 48121-0070

To whom it may concern:

In the early part of June, 2007, I started experiencing problems with the ABS system on my 2002 Ford Escape. The ABS light came on and would not go off and the ABS module would not stop running. Prior to this happening we had received a recall notice for the ABS system on Ford Escapes. So, on June 20, 2007, my husband took my Escape to Chenoweth Ford, a local Ford dealership in Clarksburg, WV (See Attachment A). As you can see, they did a thorough ABS inspection on my vehicle and at that time they informed my husband the vehicle was fine to drive.

On Saturday, August 11, 2007, at 7:15am, I attended work at the United States Postal Service as usual. Roughly, about 8:00am, the horn on my Escape started going off and would not stop. One of my co-workers went outside to see what was going on and when she came back in she said there was smoke coming out from under the hood of my vehicle. Everyone ran outside and one of the gentlemen I work with got the hood up and fire shot up from down inside the engine. At this point, we were all afraid it was going to blow up. We did call the local fire department and they responded promptly. Finally, we did get the fire put out. But, as you can see, several of my co-workers could have been seriously injured. Thank goodness my co-workers acted quickly and safely or the building could have caught fire. Later after everything calmed down, I called a tow truck to come and tow my vehicle to Chenoweth Ford. So the next day, August 12, 2007, I had to go to Enterprise Rental to rent a car, so I could have transportation back and forth to work. Because of certain issues between my insurance company, State Farm, and Chenoweth Ford, I ended up having the rental car for 19 days. This matter was totally out of my control. But because I exceeded the limitations on my rental car policy with State Farm on August 30, 2007, I had to pay \$269.86 out of my own pocket to Enterprise (See Attachment B). Also, after arriving at Chenoweth Ford that same day to pick up my Escape, I had to pay \$45.71 again out of my own pocket (See Attachment C). This was for the ABS part that actually caused the fire, because State Farm told us they would only cover what the fire damaged, but not the part that started the fire. We were also clearly informed by Mr. Lantz, service advisor at Chenoweth Ford, that the cause of the fire was definitely related to the ABS system. At that time, he spoke pretty certain that we would be reimbursed for all of our out of pocket expenses. He told us to keep all

receipts. But later we learned from State Farm that Ford Motor was not reimbursing us (See Attachment D). Mrs. Miller informed me that I should write a letter to you, Ford Motor Company, and ask for a goodwill claim or reimbursement.

I am asking Ford Motor Company to fully reimburse me for \$315.57. I feel that you are fully responsible, since all of this happened due to a recall. Why do you continually make vehicles that need to be recalled? I did my part as a car owner and took the vehicle to be serviced and I feel that I was let down. I have two precious children who could have been riding with me when the vehicle caught fire, but thank goodness they were not. I have two or three wonderful co-workers who could have been hurt, but thank goodness they were not. Again, I am asking that you fully compensate me for all out of pocket expenses.















State Farm General Insurance Company

Home Office, Bloomington, Illinois 61710

August 16, 2007



AUG 17 2007

AUG 17 2007

Ford Motor Company
Attention: Shawn Norton
P.O. Box 70

Dearborn, MI 48121-0070

(Faxed to 313-390-2107 & mailed)

(5 pgs)

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

|||||

RE: Claim Number: [REDACTED]
City/State of loss: Salem WV
Insured: [REDACTED]
Vehicle: 2002 Ford Escape XLT
VIN Number: 1FMCU04162K [REDACTED]
Mileage: 97,051

Ford Motor Company,

This notice is to advise of a loss that occurred to our insured vehicle. Our preliminary investigation indicates that Ford may be responsible for this loss. Please consider this as our notice of possible subrogation and our notice to you of the opportunity to schedule an inspection of the vehicle.

The vehicle is being held at Chenoweth Ford, RR 50, PO Box 1640, Clarksburg WV (phone 304-623-6501; fax 304-622-2185) and is available for your inspection until August 27, 2007 by appointment only. There is no authorization to inspect this vehicle outside the presence of the State Farm representative. Any violation of this authorization is not permitted.

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 304-348-6218 or 1-800-654-0212, x-6218.

Sincerely,

Christi L. Miller
Claim Representative
State Farm Mutual Automobile Insurance Company
PO Box 953
Frederick MD 21705-0976

- Insured Name: [REDACTED]
- Driver's Name: Same
- Owner Name: Same
- Date of Loss: 8-11-07
- Loss location, city and state: US Post Office employee parking, West Union WV
- Claim Number: [REDACTED]
- Description of the loss - Facts & details of loss including prior events: Insured received recall notice in mail mid-June 2007, took to dealer Chenoweth Ford specifically for recall on 6-20-07. Per Jim Lantz at Chenoweth Ford, ABS wiring harness was inspected and no problem was seen, waterproof grease was added per instructions. On 8-11-07, insured drove to work, parked vehicle, approximately 45 minutes later, her horn went off alerting employees inside, a coworker informed of smoke from under hood, another coworker raised hood and fire shot out, but was contained with fire extinguisher. Vehicle towed to dealership. Chenoweth Ford and our estimator have confirmed fire began with ABS wiring harness. Recall# 07S51. Part# 14S411-AB. Vehicle is repairable. State Farm's estimate is attached.
- Failure/defect determined to be the cause of loss (non-specific on pre-sub): ABS wiring harness
- Police/Fire report - none - West Union Volunteer Fire Dept did respond, fire already out.
- No injuries.
- Vehicle - year, make, model : 2002 Ford Escape
- Vehicle Identification Number (VIN): 1FMCU04162K [REDACTED]
- Mileage or estimated mileage if actual is not available: 97,051 on 6-20-07
- Salvage/Evidence - provide only the city/state location (Verify hold on salvage/evidence): Vehicle at Chenoweth Ford, Route 50, PO Box 1640, Clarksburg WV 304-623-6501, fax 304-622-2185, Attn Jim Lantz.

Feb 21 08 07:17p

p heaster

1-804-873-1235

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RUN REPORT

WEST UNION VOL. FIRE DEPT. INC.

☐ Phone ☐ Radio	Box No.	Time	A.M. ☐ P.M. ☐	Date 8/11/07
☐ Verbal ☐ Adt				
Company Responding				
Co. No. Type				
Time Arrived	Time Dismissed	Hours	Miles Traveled	
Incident ☒ Fire ☐ Public Service ☐ Rescue ☐ Other:				
Location or Street Address Post Office - Lot				
Type of Fire: ☐ Bldg. ☒ Veh. ☐ Appliance ☐ Woods ☐ Smoke Invest.				
Owner	Occupied by:			
Building Used	Spread to other Bldg: ☐ Yes ☒ No			
Origin of Fire:	Cause Apparent:			
Extinguished by: ☒ Booster ☐ Extinguisher ☐ Pumper ☐ Sprinkler ☐ Hydrants ☒ Chemicals ☐ Fog ☐ Other:				
No. Hydrants Used:	Hours Pumper Worked:	No. of Lines Used:		
Manpower:	Portable Pumps	Tanker		
Reason For Fire Spreading: None				
Forcible Entry: ☐ Door ☐ Windows	☐ Roof ☐ Other:			
Ventilation: ☐ Door ☐ Windows	☐ Roof ☐ Other:			
Fire Discovered by:	Address: Phone:			
Comments: Engine Company 1 (Owner) stated she had recall work done the day before. ? UNRECORDED CALL - Not Drivable				
Estimated Fire Loss:	Building	Contents	Equipment	
%				
Special Notes & Fire Scene Operations:				
Signature of Officer in Charge				

Feb 21 08 07:18p p heaster

1-304-873-1235

p.3

p.c1

Call 304-873-3257

Call Number: [REDACTED]
Primary Incident Number:
All Incident Numbers:
[REDACTED]

ESN: :48 District: West Union
Received: 8/11/2007 07:47:20
Caller: USPS BUS
Call Taker: JKS
City: WEST UNION State: WV ZIP Code:
Place:
Address: [REDACTED]
Apt: Floor: Phone: [REDACTED]
Nature: VEHICLE FIRE Discipline: Agency: Central Communications Inc
Location:
Landmark:
Caller Address: [REDACTED]
WEST UNION, WV
Description: PAUL WEEKLY CALLER STATED THAT THERE WAS A VEH. FIRE AT THE PO
ST OFFICE AND THE VEH IS RIGHT NEXT TO THE BLDG

Location Alert Info:

Call Event: Event Type: CALL
Event Time: 8/11/2007 07:55:19
Event Description: AUTH ENG 1 CO 3 CAN RETURN TO SERVICE

Unit Info: Unit: CO1
Unit Description: West Union VFD Station
Destination:
Mileage Begin: 0 Mileage End: 0

Dispatch: 8/11/2007 07:49:19
2ndAlert: 8/11/2007 07:52:27
Enroute: 8/11/2007 07:53:38
OnScene:
Depart:
Arrive:
Available:
Completed: 8/11/2007 07:53:47

Unit: CO3
Unit Description: Smithburg VFD Station
Destination:

Feb 21 08 07:18p p heaster

1-304-873-1235

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p.02

Mileage Begin: 0 Mileage End: 0

Dispatch: 8/11/2007 07:49:19
2ndAlert: 8/11/2007 07:52:29
Enroute:
OnScene:
Depart:
Arrive:
Available: 8/11/2007 07:54:40
Completed: 8/11/2007 07:55:03

Unit: C05
Unit Description: Doddridge Co. EMS Station
Destination:
Mileage Begin: 0 Mileage End: 0

Dispatch: 8/11/2007 07:49:19
2ndAlert:
Enroute: 8/11/2007 07:51:42
OnScene:
Depart:
Arrive:
Available:
Completed: 8/11/2007 07:51:54

Unit: 655
Unit Description: Doddridge EMS
Destination:
Mileage Begin: 0 Mileage End: 0

Dispatch: 8/11/2007 07:49:19
2ndAlert: 8/11/2007 07:52:30
Enroute:
OnScene: 8/11/2007 07:54:31
Depart:
Arrive:
Available: 8/11/2007 07:59:29
Completed: 8/11/2007 08:01:38

Event Type: LKP Event
Event Time: 8/11/2007 07:54:31
Event Description: [REDACTED]

Event Dispatcher: RDH

Feb 21 08 07:19p p heaster
C:\Program Files\Foxit Software\Foxit Reader\Foxit Reader.exe

1-304-873-1235

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C:\304-873-1235\

p.03

Unit: ENGL
Unit Description: Engine 1
Destination:
Mileage Begin: 0 Mileage End: 0

Dispatch: 8/11/2007 07:49:19
2ndAlert: 8/11/2007 07:52:27
Enroute: 8/11/2007 07:53:38
Onscene: 8/11/2007 07:54:21
Depart:
Arrive:
Available:
Completed: 8/11/2007 08:08:46

Event Type: LKP Event
Event Time: 8/11/2007 07:54:21
Event Description: 208 COTTAGE AVE

Event Dispatcher: RDH

Event Type: UNIT
Event Time: 8/11/2007 07:58:24
Event Description: REQ NICHLSONS

Event Dispatcher: JKS

Unit: RES1
Unit Description: Rescue 1
Destination:
Mileage Begin: 0 Mileage End: 0

Dispatch: 8/11/2007 07:54:01
2ndAlert:
Enroute: 8/11/2007 07:54:06
Onscene: 8/11/2007 07:54:39
Depart:
Arrive:
Available: 8/11/2007 07:59:52
Completed: 8/11/2007 08:02:14

Event Type: LKP Event
Event Time: 8/11/2007 07:54:39
Event Description: 208 COTTAGE AVE

Event Dispatcher: RDH

02/22/08 10:00 FAX 304 368 3350
Feb 21 08 07:19p p heaster

STATE FARM FRMNT ANNEX

1-304-873-1235

0007

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p.04

Unit: ENG31
Unit Description: Engine 31
Destination:
Mileage Begin: 0 Mileage End: 0

Dispatch: 8/11/2007 07:49:19
2ndAlert: 8/11/2007 07:52:29
Enroute:
OnScene:
Depart:
Arrive:
Available: 8/11/2007 07:54:40
Completed: 8/11/2007 07:55:05



















BEGINNING OF CONTACT
03/10/2009

VOICE OF THE CUSTOMER TRACKING SYSTEM

13.05.57

=====

REGION: W2 SAN FRANCISCO	OGC ISSUE	CASE NBR: 1650732552
VIN: 1FMYU041X1K[REDACTED]	ZONE: A03	OPENED: 03/06/2009
	ENGINE: 1	CLOSED: 03/06/2009
	VEH TYPE: T	

=====

LAST NAME: [REDACTED]	FIRST NAME: [REDACTED]	STATUS: CLOSED
TITLE: [REDACTED]		MI: S
ADDRESS: [REDACTED]		
CITY: PACIFICA	STATE: CA	ZIP: 94044
HOME PHONE: [REDACTED]		
MODEL YEAR: 2001	MODEL: ESCAPE XLT 4X4	
MILEAGE: 196000		
DEALER NAME: SERRAMONTE FORD, IN	SALES CODE: F72024	P & A: 07737
REASON CODE: 0792 LEGAL - ACCIDENT / FIRE		
SYMPTOMS: 704100 FIRE/SMOKE VISIBLE FLAME		

ORIGIN: CACI38 - US CONCERN CASE BASE COMMUNICATION: PHONE
ACTION: 792 - CONTACT ADVANCED TO OGC - FIRE
DOCUMENT: ANALYST: CGOSSELI CASSANDRA GOSSELI (CGOSSELI)

DATE: 03/06/2009 TIME: 14.12.57 :
ACTION DATA/COMMENTS:

FORD MOTOR COMPANY
RECEIVED
CLAIMS UNIT

MAR 10 2009

OFFICE OF THE
GENERAL COUNSEL

CUSTOMER SAID: -DATE THE VEHICLE CAUGHT ON FIRE?-03/02/2009-
WHERE THE FIRE ORIGINATED IN THE VEHICLE?-UNDER THE HOOD-CUR
RENT LOCATION OF THE VEHICLE?-ARCO AUTO BODY-IF THERE WERE D
AMAGES TO ANYTHING OTHER THAN THE VEHICLE?-NO-WHETHER OR NOT
THE VEHICLE IS REPAIRABLE?-YES-WHETHER OR NOT THE VEHICLE W
AS RUNNING WHEN THE FIRE STARTED?-YES-WHAT THE CUSTOMER IS S
EEKING?-REPAIR AND FINANCIAL ASSISTANCE
DEALER SAID: -NONE
CRC ADVISED: I WILL FORWARD YOUR INFORMATION TO FORD'S OFFICE O
F THE GENERAL COUNSEL. YOU SHOULD RECEIVE A WRITTEN RESPON
S E WITHIN 15 BUSINESS DAYS TO YOUR CONCERN.***NOTE TO CSR: P
LEASE REMEMBER TO VERIFY ALL CUSTOMER CONTACT INFORMATION BE
FORE SENDING ISSUE.-VIN: 1FMYU041X1K[REDACTED] 2001 ESCAPE

ABS
repaired



BEGINNING OF CONTACT
04/24/2009

VOICE OF THE CUSTOMER TRACKING SYSTEM

11.55.29

REGION: W1 LOS ANGELES	OGC ISSUE	CASE NBR: 0575721109
VIN: 1FMYU04182K	ZONE: A06	OPENED: 04/20/2009
	ENGINE: 1	CLOSED: 04/20/2009
	VEH TYPE: T	
LAST NAME: [REDACTED]	FIRST NAME: [REDACTED]	STATUS: CLOSED
TITLE: [REDACTED]		MI: D
ADDRESS: [REDACTED]		
CITY: DOWNEY	STATE: CA	ZIP: 90241
HOME PHONE: [REDACTED]		
MODEL YEAR: 2002	MODEL: ESCAPE XLT 4X4	
MILEAGE: 96000		
DEALER NAME: LLOVIO FORD	SALES CODE: F71058	P & A: 05449
REASON CODE: 0792 LEGAL - ACCIDENT / FIRE		
SYMPTOMS: 704300 FIRE/SMOKE SCORCHED/BURNT		

ORIGIN: CACI38 - US CONCERN CASE BASE COMMUNICATION: PHONE
ACTION: 792 - CONTACT ADVANCED TO OGC - FIRE
DOCUMENT: ANALYST: PBROOK39 PEGGY BROOKS (PBROOK39)

FORD MOTOR COMPANY
RECEIVED
CLAIMS UNIT

DATE: 04/20/2009 TIME: 15.59.31 :
ACTION DATA/COMMENTS:

APR 24 2009

OFFICE OF THE
GENERAL COUNSEL

CUSTOMER SAID: CALLER WRITER [REDACTED] -WIFE 96000 MILES ON VEHF
IRE DATE: 4/20/09ABS WAS ON-SMOKE UNDER THE HOOD LEAK FROM T
HE BACK FROM THE MASTER SOLENOID--LEAKING BRAKE FLUID**FIRE
STARTED UNDER THE HOOD **VEH IS ACROSS FROM OWNERS HOME **FI
RE DEPARTMENT NO FIRE REPORT AVAILABLE **DOWNEY CITY**LOS AN
GELOS COUNTY **CITY OF DOWNEY FIRE DEPARTMENT **VICTOR FUREA
DO FIRE INSPECTOR FOR THE CITY OF DOWNEY(562-904-7350)**NO P
OLICE WAS PRESENT **CONTACTED INSURANCE COMPANY--NO RESPONSE
**NOT REPAIRABLE **TOTALLY BURNT **VEH WAS NOT RUNNING AT T
HE TIME OF THE FIRE **SEEKING IF THIS IS AFFECTED BY THE ABS
--COULD HAVE CAUSED THE FIRE **DID NOT RECIEVED A LETTER OF
A RECALLED **WAS GOING TO CONTACT FMC ABOUT THE RECALL ON TH
E VEHPURCHASED THE VEH IN 3/2006--SUBSEQUENT OWNER OF VEHDEA
LER SAID: LLOVIO FORD INC.5645 FIRESTONE BLVD. SOUTH GATE, C
A 90280TEL:(562) 927-7888CRC ADVISED: I WILL FORWARD YOUR IN
FORMATION TO FORD'S OFFICE OF THE GENERAL COUNSEL. YOU SHOU
LD RECEIVE A WRITTEN RESPONSE WITHIN 15 BUSINESS DAYS TO YOU
R CONCERN.***NOTE TO CSR: PLEASE REMEMBER TO VERIFY ALL CUS
TOMER CONTACT INFORMATION BEFORE SENDING ISSUE.

*repaired
- greased*





Citizens
InsuranceTM
A company of The Hanover Insurance Group

3
SUBRO

January 23, 2009

Certified and Regular Mail
7006 0100 0006 5985 5527

FORD MOTOR COMPANY
RECEIVED
CLAIMS UNIT

JAN 27 2009

OFFICE OF THE
GENERAL COUNSEL

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

D007113

m. Hull

Re: Claim Number: [REDACTED]
Date of Loss: 01/13/2009
Our Insured: [REDACTED]
Subject Vehicle: 2002 Ford Escape
Bearing VIN: 1FMYU04172K [REDACTED]

JAN 26 AM 10:58

CONSUMER AFFAIRS
SECTION

To Whom It May Concern:

Please accept this notice as our possible subrogation right in relation to the above referenced vehicle.

On January 13, 2009 the above referenced vehicle suffered a fire. The vehicle was properly insured by Citizens Insurance Company of America under policy number A6B 8503536. We are currently conducting an investigation of the fire and pursuing any potential claim we may have against any and all parties who may have had some connection with this loss.

We have retained Herndon & Associates to conduct a cause and origin investigation into the above referenced fire. The preliminary investigation reveals that Ford Motor Co. was responsible in some way for the damages to our insured's property. If you wish to conduct your own investigation into the cause and origin of the fire, please contact Herndon & Associates at 800-961-2909 to coordinate the investigation.

The above referenced vehicle is currently located at [REDACTED]
Woodhaven, MI, [REDACTED]



Please contact me with any questions that you may have regarding this matter. I can be reached at 1-800-628-0250 Ext. 6676. Thank you in advance for your anticipated cooperation in this matter.

Sincerely,

Johnathon Ott
Auto Theft/Fire Unit

cc: File



VIN: 1FMYU04151 [REDACTED] Year: 2001 Model: ESCAPE Case: [REDACTED]
 Name: [REDACTED] Owner Status: Subsequent WSD: 2001-02-06
 Symptom Desc: GENERAL INQUIRIES REQUEST/NON-VEHICLE RELATED Primary Phone: [REDACTED]
 Reason Desc: LEGAL - RELATED TO 05S28 - FIRE Secondary Phone:
 Issue Type: 07 LEGAL Issue Status: OPEN Dealer:
 Origin Desc: US CONCERN CASE BASE P & A Code:
 Odometer: 93000 MI Comm Type: PHONE
 Action Date: 08/13/2008 Action Time: 15:00:39:763 Action Data: No
 Analyst Name: JENNIFER WILLINGHAM (JWILLIN7) Analyst: JWILLIN7

Caller Information If Different From Vehicle Owner:

First Name	Middle Initial	Last Name	Day Phone	Relationship
RICHARDO		NUNS	3168067117	OTHER

COMMENTS: CUSTOMER SAID: -WAS AN ABS RECALL ON VEH***SEEKING TO HAVE FORD PAY FOR REPAIRS NEEDED ON VEH DUE TO FIRE***-VEH CAUGHT ON FIRE-CAUGHT ON FIRE 6/20/08-FIRE CAME FROM THE WIRE HARNESS-VEH IS AT [REDACTED] WICHITA KS [REDACTED] FIRE REPORT WAS FILED-NOTHING ELSE WAS DAMAGED-DID NOT FILE A CLAIM WITH INSURANCE-IT HAS ALREADY BEEN REPAIRED BY THE DLRSH-NO ATTORNEY-VEH WAS RUNNING WHEN THE FIRE STARTEDDEALER SAID: RUSTY ECK FORD INC7310 EAST KELLOGG WICHITA, KS 67207TEL:(888) 631-7811FAX:(316) 687-3803-NONECRC ADVISED: I WILL FORWARD THIS INFORMATION TO THE FORD OFFICE OF THE GENERAL COUNSEL. YOU WILL RECEIVE WRITTEN NOTIFICATION WITHIN 10 BUSINESS DAYS WHICH YOU WILL NEED TO RESPOND TO IN WRITING. NOTE TO CCR: REMEMBER TO VERIFY ALL CUSTOMER CONTACT INFORMATION BEFORE SENDING ISSUE.

Customer: [REDACTED] WICHITA KS [REDACTED]



[REDACTED]
Shirley, NY
[REDACTED]

Ford Motor Company
Customer Relationship Center
P.O. Box 6248
MD- 3NE- B
Dearborn, MI 48126

April 14, 2008

To whom it may concern,

On Monday, March 24, 2008 our 2001 Ford Escape ignited while turned off for over 3 ours in our driveway. If not for a passerby our other vehicles and possibly our home could have burnt to the ground. But fortunately only the Ford Escape was totally destroyed, our Grand Voyager was damaged on the hatchback, lights and rear bumper and our driveway was damaged. If this passerby did not stop our other 2 vehicles which were very close to the Ford as well as my neighbors two cars and our home which is approx. 12ft. from our home did not sustain damage.

After speaking with two separate Consumer Affairs Representatives I was told Ford Motor Co. would not do anything for us and would not use their resources to investigate this incident. And because my our insurance co. had been notified I was told they would have to use their own resources to pursue any further action.

Since my own insurance co. will not pay for damage to my Grand Voyager and I will be given a sharp increase in my homeowners policy if I file a property damage claim for the driveway repair as well as loss of property that was in the Ford I am seeking reimbursement for my repairs and any other damages incurred as a result, as well as any other expenses such as the deductible costs.

I would like to settle this directly with the Co. if possible but if this is not your policy I am requesting that you send me the name of the person or entity and address to whom in New York State would accept a suit on behalf of Ford Motor Co. in small claims court.

Thank You!

Sincerely,
[REDACTED]



2001 Ford Excursion





Back of 1st layer



ENGINE



2001 Ford Escape



BEGINNING OF CONTACT
08/29/2008

VOICE OF THE CUSTOMER TRACKING SYSTEM

08.00.07

REGION: C2 HOUSTON OGC ISSUE
VIN: 1FMYU03132K ZONE: A03 CASE NBR: 0352642418
ENGINE: 1 VEH TYPE: T OPENED: 08/28/2008
CLOSED: 08/28/2008

LAST NAME: [REDACTED] FIRST NAME: [REDACTED] STATUS: CLOSED
TITLE: [REDACTED] MI:
ADDRESS: [REDACTED]
CITY: SPRING STATE: TX ZIP: 77388
HOME PHONE: [REDACTED]
MODEL YEAR: 2002 MODEL: ESCAPE XLT 4X2
MILEAGE: 70000
DEALER NAME: LONE STAR FORD SALES CODE: F52029 P & A: 06947
REASON CODE: 0792 LEGAL - ACCIDENT / FIRE
SYMPTOMS: 704100 FIRE/SMOKE VISIBLE FLAME

ORIGIN: CACI38 - US CONCERN CASE BASE COMMUNICATION: PHONE
ACTION: 792 - CONTACT ADVANCED TO OGC - FIRE
DOCUMENT: ANALYST: ASPARACI ASHLEY SPARACINO (ASPARACI)

FORD MOTOR COMPANY
RECEIVED
CLAIMS UNIT

DATE: 08/28/2008 TIME: 09.47.43:
ACTION DATA/COMMENTS:

AUG 29 2008

OFFICE OF THE
GENERAL COUNSEL

CUSTOMER SAID: ~YESTERDAY VEH CAR ALARM WENT OFF AND TURNED IT OFF AND THEN LOOKED OUT THE WINDOW AND THERE WAS SMOKE COMING FROM UNDER THE HOOD AND CALLED THE FIRE DEPARTMENT AND OPENED THE HOOD AND SAW THAT IT CAUGHT FIRE WHILE PARKED IN THE DRIVE WAY ~FIRE DEPARTMENT PUT OUT THE FIRE AND DETERMINED IT WAS AN ELECTRICAL WIRE AND CUT THE CORD TO THE BATTERY ~CUST CALLED A TOW TRUCK AND HAD THE VEH REMOVED TO HIS MECHANIC ~VEH IS SITTING AT THE PRIVATE GARAGE ~CUST STATES THAT THERE WAS A RECALL FROM FORD REGARDING THE ABS CONTROL MODULE AND WANTS TO KNOW IF ITS ON HIS VEH ~VEH CAUGHT FIRE 8-27-08 ~THE FIRE ORIGINATED UNDER THE HOOD ON THE DRIVE SIDE UNDER THE BRAKE FLUID AREA~CURRENT LOCATION OF THE VEH IS AT HIS PRIVATE GARAGE ~THERE WAS A FIRE REPORT FILED ~THE FINDINGS WAS IT STARTED DUE TO AN ELECTRICAL WIRE ~THE REPORT WAS FILED IN HARRIS COUNTY IN SPRING CITY TEXAS~THERE WAS NO DAMAGES TO ANYTHING OTHER THEN THE VEH ~DID NOT FILE A CLAIM WITH INSURANCE CO. YET ~THE VEH WAS NOT RUNNING WHEN THE FIRE STARTED ~CUST SEEKING IF THE VEH IS RECALLED FOR THIS ISSUE AND ANY OTHER RECALLS THAT WERE ON HIS VEH~DEALER SAID: LONE STAR FORD INC8477 NORTH FREEWAY HOUSTON, TX 77037TEL:(281) 931-3300CRC ADVISED: I WILL FORWARD THIS INFORMATION TO THE FORD OFFICE OF THE GENERAL COUNSEL. YOU WILL RECEIVE WRITTEN NOTIFICATION WITHIN 10 BUSINESS DAYS WHICH YOU WILL NEED TO RESPOND TO IN WRITING.**NOTE TO CSR: PLEASE REMEMBER TO VERIFY ALL CUSTOMER CONTACT INFORMATION BEFORE SENDING ISSUE ~ADVISED CUST ABOVE INFORMATION ~MR. [REDACTED] ~SPRING, TEXAS [REDACTED]

Ms. Micki Lynn
Claims Analyst/Litigation Assistant
Office of the General Counsel
Ford Motor Company
Claims Department
P.O. Box 70
Dearborn, Michigan 48121-0070

RECEIVED

SEP 19 2008

SUBJECT: 2002 Ford Escape ABS Electrical Fire Claim

Dear Ms. [REDACTED]

This is a follow-up to the copy of the enclosed letter that I received from you regarding my notification to the Ford Motor Company of the ABS electrical fire caused to my 2002 Ford Escape (VIN: 1FMYU03132 [REDACTED]). The Ford reference number provided to me by your customer service for this claim is: [REDACTED]. My name, address, telephone and fax numbers are as follows:

[REDACTED]
Spring, Texas [REDACTED]

Telephone No. [REDACTED]

Fax Number: [REDACTED]

I would like to file a claim against Ford Motor Company for this ABS related electrical fire to my vehicle. I would like to get my vehicle repaired at Ford's expense for continued usage. This fire was caused due to no fault of our own. My wife, [REDACTED] came home from work on 8-27-08 and parked the Escape in the driveway at 4:30 PM. At around 5:10 PM, about 40 minutes later from the 4:30 PM parking, we heard the car alarm and looked outside our dining room window and there was smoke coming out from under the hood. I called 911 and the fire department came out and put out the fire. They said it was an electrical fire and in order to prevent the re-ignition of the electrical fire, they cut one of the cables to the car battery. I have had my vehicle towed to my auto mechanic shop, Dan's Automotive in Spring, Texas. The vehicle is still at this location. I went over to the Ford Dealership, Lone Star Ford in Houston, where I initially bought this vehicle from and their response was they did not want to look at it and that I should contact Ford or my insurance company directly. I would not like to file a claim against my insurance company because this fire was not our fault. When my Escape was recalled for the ABS control module check last year, I took my vehicle to Lone Star for the fix last year on 5-27-07. They did what they were supposed to but this problem was not fixed correctly. If it was fixed properly, then why would a fire be caused one year later related to the ABS control Module Switch area in the vehicle.

So please fax back to me (at the fax number provided above) immediately Ford's response and what Ford is going to do to fix my vehicle. I have already been out of pocket of my vehicle for the last three weeks. I need my vehicle fixed so I can have usage of my vehicle. Thanks.

Date: 09/17/08

[REDACTED]
Spring, Texas

USA

Telephone [REDACTED]

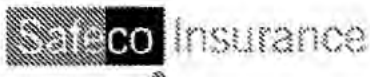
Fax No. [REDACTED]

E-mail: [REDACTED]

General Insurance Company of America
St Louis
PO Box 461
St Louis, MO 63166

Mailing Address:
PO Box 461
St Louis, MO 63166

Phone: (800) 332-3226
(717) 838-0995
Fax: (888) 268-8840



October 10, 2008

Ford Motor Company
1 American Rd
Dearborn, MI 48126
Attn: NEW CLAIMS

SUBROGATION NOTICE

Our Insured Name: [REDACTED]
Our Claim Number: [REDACTED]
Loss Date: August 27, 2008
Your Insured: Ford Motor Company
Your Claim Number:

Dear Ford Motor Company:

We have completed our investigation of the above loss. Our investigation indicates that your insured is liable for the damages to our insured's property. Under our insured's policy, we have become legally subrogated to the right of our insured to recover from your policyholder. As such, we are seeking reimbursement from you for the damages we paid out on behalf of our insured.

Enclosed please find the documentation that will support the claim.

Collision: \$1,255.81
Rental:
Out-of-pocket:
Deductible: \$1,000.00
Salvage:

Property Damage TOTAL: \$2,255.81

October 10, 2008

Please issue your check payable to General Insurance Company of America, Attn: Subrogation Cashier, PO Box 461, St. Louis, MO 63166.

Please direct all future subrogation correspondence to **LEANN REPOS** at the mailing address noted above. If you have any questions **LEANN** can be reached at **(800) 332-3226**.

Sincerely,



LeAnn Repos
St Louis
General Insurance Company of America
(800) 332-3226
(717) 838-0995 Fax: (888) 268-8840
learep@safeco.com





Member of Liberty Mutual Group

Safeco Insurance Company of Illinois
Agency Markets Subrogation
1315 N. Highway Drive
Fenton, MO 63026

Mailing Address:
P.O. Box 515097
Los Angeles, CA 90051-5097

Phone: (800) 332-3226
(636) 825-3177
Fax: (888) 268-8840

April 28, 2009

Ford Motor Company
P.O. Box 70
Dearborn, MI 48121-0070

Insured Name: [REDACTED]
Policy Number: [REDACTED]
Loss Date: April 22, 2009
Claim Number: [REDACTED]

To Whom It May Concern:

Our investigation to date indicates that you were the proximate cause of this loss. Under the terms of our insured's policy with us, we have become legally subrogated to the right to our insured to recover our damages. As such, we are seeking reimbursement from you for the damages we paid out on behalf of our insured.

At this time, we are seeking reimbursement in the amount of \$124.42. In addition, our insured incurred deductible and/or out-of-pocket expenses totaling \$500.00, bringing the total amount of the claim to \$624.42.

It is our desire to resolve this matter in an amicable fashion. **If you would like to inspect our vehicle, please contact me at the number below to discuss.** If not, please send your payment with the claim number [REDACTED] on your check or money order to ensure proper posting to the address below.

**Agency Markets Subrogation Centre
Attention: Subrogation Cashier
PO BOX 461
St. Louis, MO 63166-9970**

** INBOUND NOTIFICATION : FAX RECEIVED SUCCESSFULLY **

TIME RECEIVED	REMOTE CSID	DURATION	PAGES	STATUS
April 28, 2009 11:03:44 AM EDT	SAFECO Insurance	793	14	Received
SAFECO Insurance 4/28/2009 7:49 AM PAGE 3/014 Fax Server				

Page 2
Cecil G Meyer Shirley Meyer
April 28, 2009

Sincerely,

Christina Freund
Agency Markets Subrogation
Safeco Insurance Company of Illinois
(800) 332-3226
(636) 825-3177 Fax: (888) 268-8840
christina.freund@libertymutual.com

** INBOUND NOTIFICATION : FAX RECEIVED SUCCESSFULLY **

TIME RECEIVED	REMOTE CSID	DURATION	PAGES	STATUS
April 28, 2009 11:03:44 AM EDT	SAFECO Insurance	793	14	Received
SAFECO Insurance	4/28/2009 7:49 AM	PAGE 12/014	Fax Server	



** INBOUND NOTIFICATION : FAX RECEIVED SUCCESSFULLY **

TIME RECEIVED

April 28, 2009 11:03:44 AM EDT

REMOTE CSID

SAFECO Insurance

DURATION

793

PAGES

14

STATUS

Received

SAFECO Insurance

4/28/2009 7:49 AM

PAGE

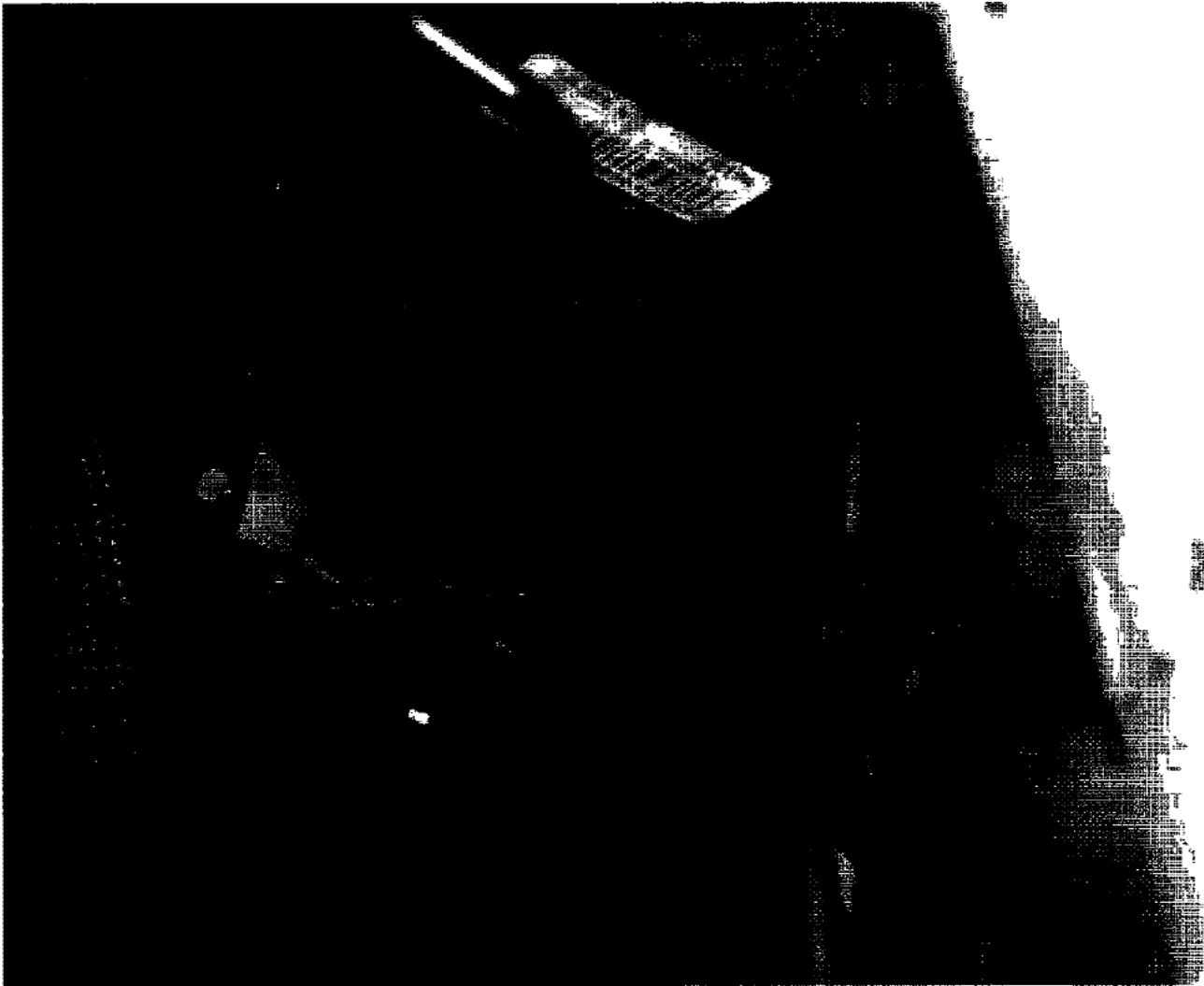
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Fax Server



** INBOUND NOTIFICATION : FAX RECEIVED SUCCESSFULLY **

TIME RECEIVED	REMOTE CSID	DURATION	PAGES	STATUS
April 28, 2009 11:03:44 AM EDT	SAFECO Insurance	793	14	Received
SAFECO Insurance	4/28/2009 7:49 AM	PAGE 14/014	Fax Server	





BEGINNING OF CONTACT
04/29/2008

VOICE OF THE CUSTOMER TRACKING SYSTEM

08.00.11

REGION: W5 SEATTLE OGC ISSUE CASE NBR: 1611751198
VIN: 1FMCU04191K [REDACTED] ZONE: A03 OPENED: 04/28/2008
ENGINE: 1 VEH TYPE: T CLOSED: 04/28/2008
LAST NAME: [REDACTED] STATUS: CLOSED
TITLE: [REDACTED] FIRST NAME: [REDACTED]
ADDRESS: [REDACTED]
CITY: NEWBERG STATE: OR ZIP: 97132
HOME PHONE: [REDACTED]
MODEL YEAR: 2001 MODEL: ESCAPE XLT 4X4
MILEAGE: 100000
DEALER NAME: NEWBERG FORD MERCUR SALES CODE: F74503 P & A: 08465
REASON CODE: 0792 LEGAL - ACCIDENT / FIRE
SYMPTOMS: 704145 FIRE/SMOKE VISIBLE FLAME UNDERHOOD

ORIGIN: CACI38 - US CONCERN CASE BASE COMMUNICATION: PHONE
ACTION: 792 - CONTACT ADVANCED TO OGC - FIRE
DOCUMENT: ANALYST: KSANDBE7 SANDBERG (KSANDBE7),KEVIN

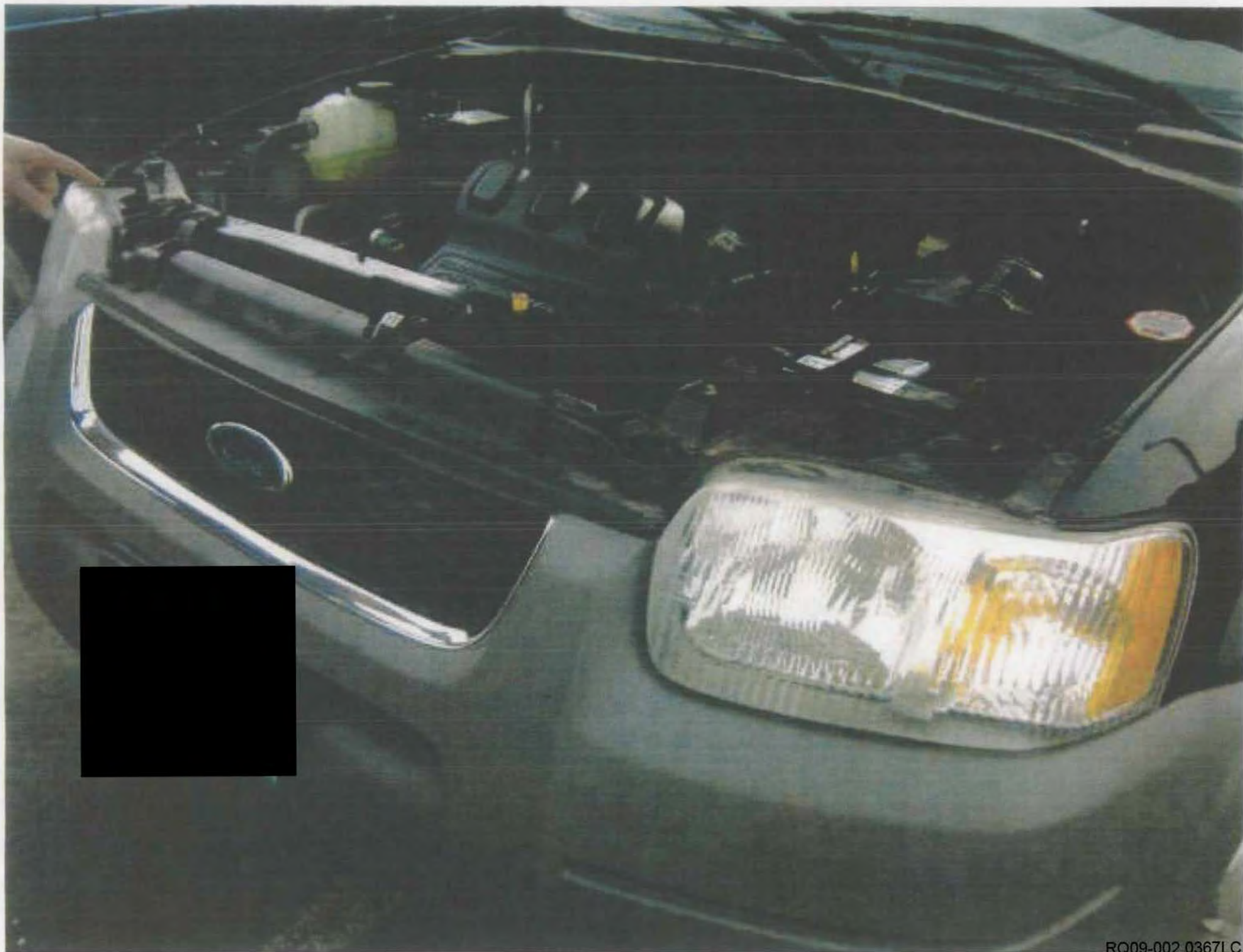
FORD MOTOR COMPANY
RECEIVED
CLAIMS UNIT

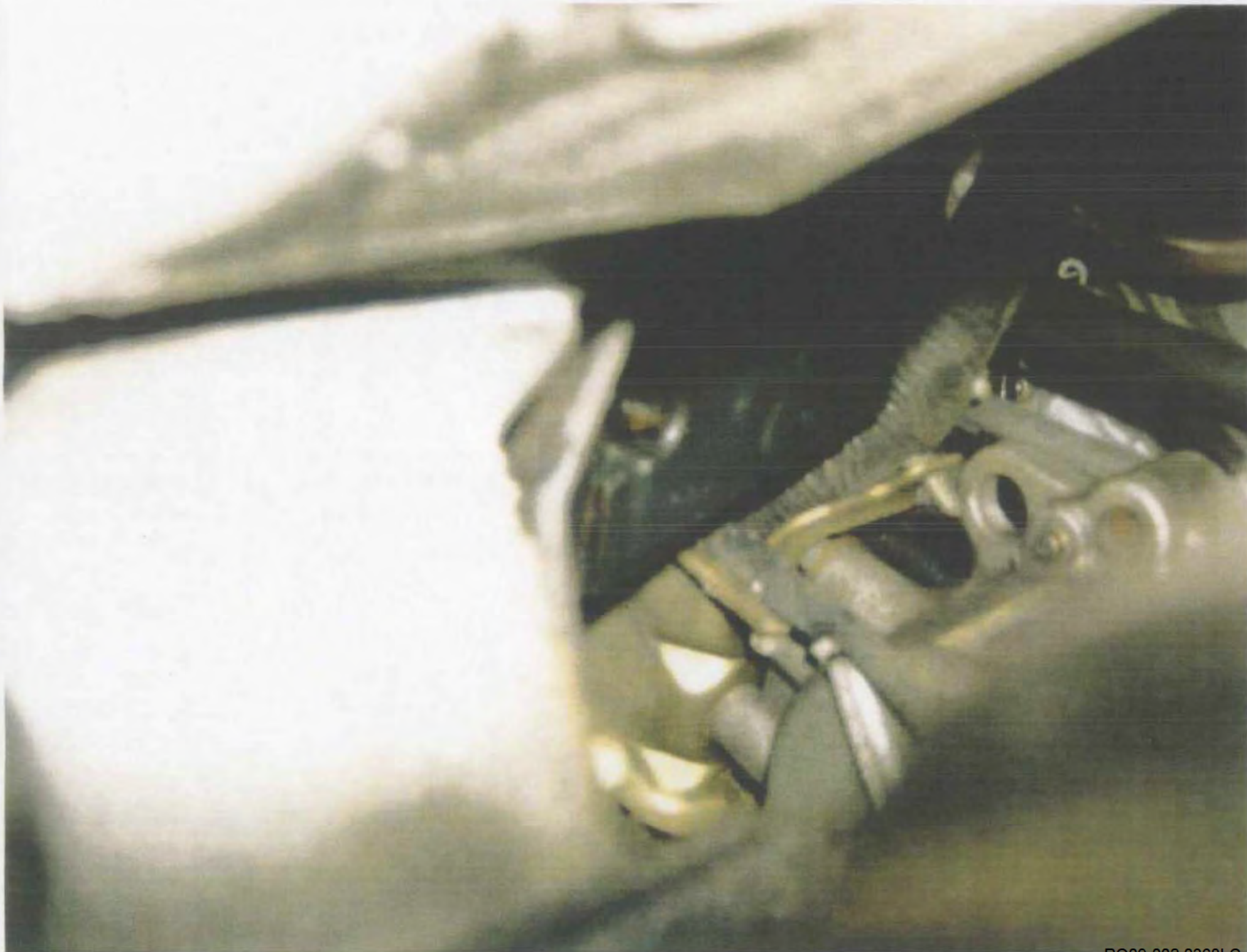
DATE: 04/28/2008 TIME: 16.59.33;
ACTION DATA/COMMENTS:

APR 29 2008

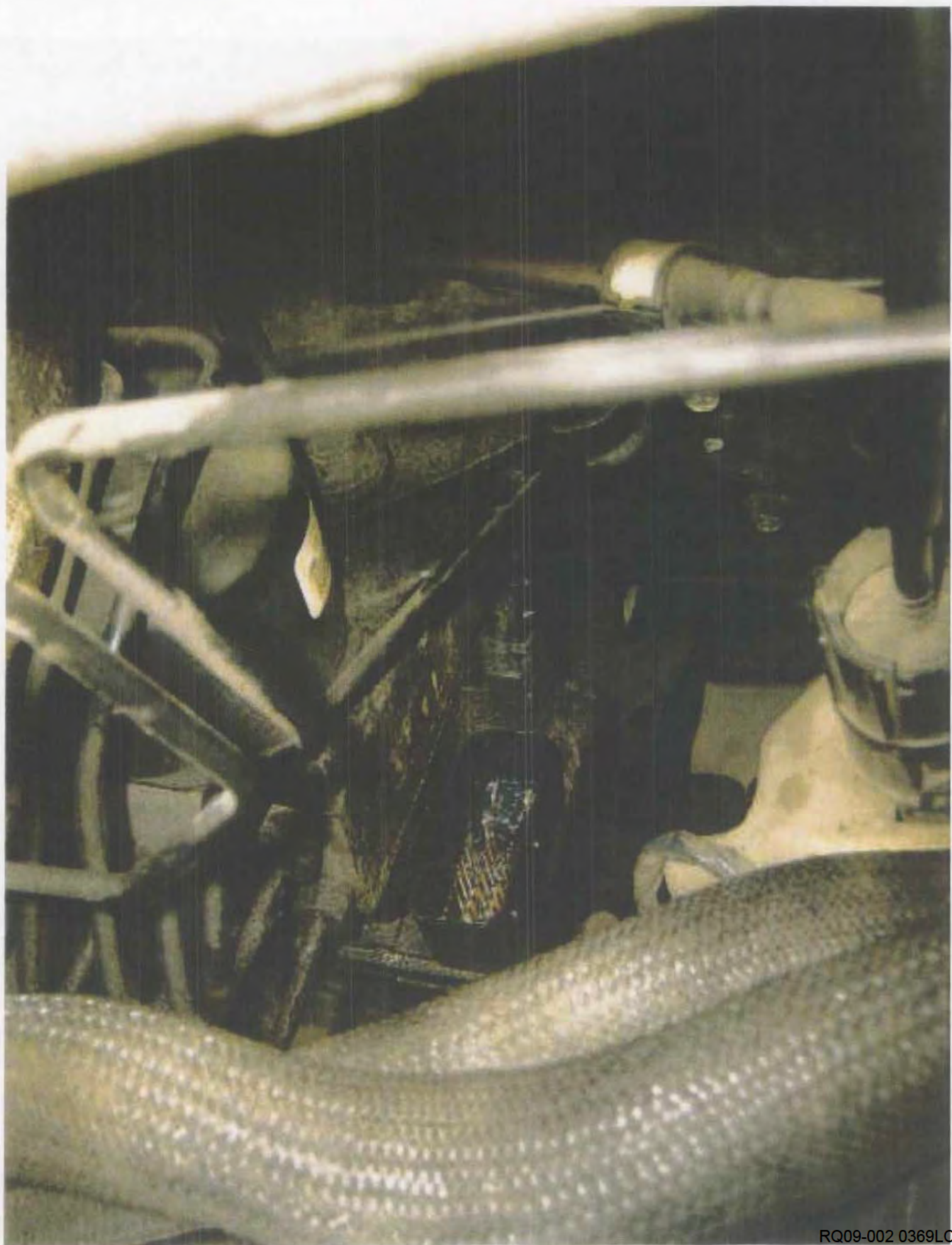
OFFICE OF THE
GENERAL COUNSEL

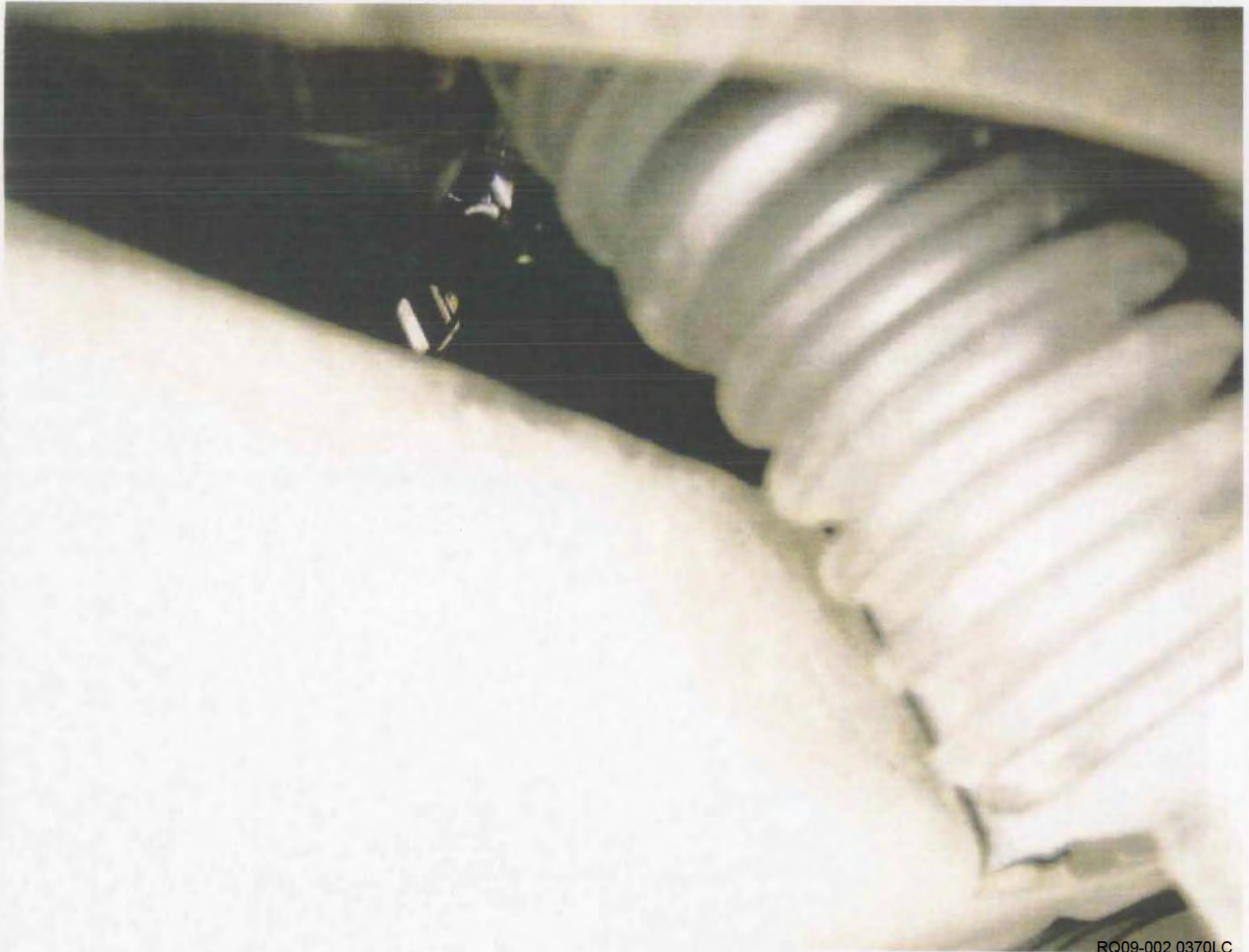
CUSTOMER SAID: -VEH CAUGHT FIRE ON SUNDAY (4/20/08)-THE NEWB
URG FIRE DEPARTMENT WAS CALLED AND HANDLED THE ISSUE-CUSTOME
R HAS NOT CONTACTED THE INSURANCE-VEH IS AT THE DEALER NOW-D
LR DETERMINEED IT WAS THE ECU THAT WAS THE CAUSE OF THE FIRE
-DLR HAS STATED THE VEHICLE IS REPAIRABLE-VEH AT DLR NOW-CUS
TOMER STATES THIS MAY BE RELATED TO A RECALL (NHTSA CAMPAIGN
NUMBER: 07V156000)-NO OTHER DAMAGE WAS DONE TO ANY OTHER VE
HICLES OR BUILDINGS-THERE ARE NO INJURIES IN RELATION TO THI
S ISSUE-SEEKING TO HAVE THIS REPAIR COVERED BY FORDDEALER SA
ID: -DLR TOLD CUST THE VEH IS REPAIRABLE-DLR TOLD CUST THE F
IRE ORIGINATED FROM THE ECU-CUST SPOKE TO BOTH S/A DANIEL AN
D S/M MIKE JONES IN THE SERVICE DEPARTMENT AT THE DEALER-NEW
BERG FORD MERCURY3900 PORTLAND ROAD NEWBERG, OR 97132TEL:(50
3) 538-2171CRC ADVISED: I WILL FORWARD THIS INFORMATION TO T
HE FORD OFFICE OF THE GENERAL COUNSEL. YOU WILL RECEIVE WRI
TTEN NOTIFICATION WITHIN 10 BUSINESS DAYS WHICH YOU WILL NEE
D TO RESPOND TO IN WRITING.***NOTE TO CSR: PLEASE REMEMBER
TO VERIFY ALL CUSTOMER CONTACT INFORMATION BEFORE SENDING IS
SUE





RQ09-002 0368LC







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

April 18, 2008

FORD MOTOR COMPANY
RECEIVED
CLAIMS UNIT

APR 29 2008

OFFICE OF THE
GENERAL COUNSEL

To Whom It May Concern,

Recent events involving our Ford Vehicles has lead me to write this letter.

A little background first. The first Car I ever owned was a 1976 Mercury Bobcat hatchback which I purchased used in 1977. As with most first vehicles I had a love affair of sorts with that little car. While it was necessary to sand and repaint the body nearly every summer to stem the progression of body rust the engine was a workhorse. I maintained the vehicle immaculately and it was little trouble aside from routine maintenance. I kept it until late 1983 when it had over 115,000 miles on the odometer.

I married in 1981 and it was quickly apparent we needed a second car for my wife whereupon we bought our first new car – a 1982 Ford Escort (purchased at Gene Butman Ford). Aside from a few recalls it too was a work horse of a car which we greatly enjoyed. Late in 1983 we traded in the Bobcat for our second Escort (1984 model again purchased new at Gene Butman Ford). Although a more basic model than our first Escort the second also served us well with few problems.

Our third car was a 1986 Dodge Charger hatchback which replaced the first Escort. While the purchase price on that vehicle was very attractive it turned out to be nothing but trouble and we ruled out any future purchases of Chrysler products. My father-in-law convinced us to replace the second Escort with a General Motors product as he was an Oldsmobile employee and offered to get us an "employee" purchase price. Not wanting to create hard feelings in the family we replaced the second Escort with a 1990 Oldsmobile Cutlass Calais. It turned out that it too was nothing but hassles including a major engine re-build at 48,000 miles and a transmission replacement at 65,000 miles. I want to emphasize that we took just as good care of these non Ford cars as we had our Ford vehicles. We have always changed the oil and performed maintenance as called for in the owner's manuals as well as having our cars detailed twice a year – once in the spring and once in the fall (a habit we still maintain today).

Following our unpleasant experiences with Chrysler and GM products our next purchase was a 1992 Mercury Sable (to replace the Charger purchased at Apollo Lincoln, Mercury) and later we replaced the Oldsmobile with a 1995 Ford Windstar (again purchased at Gene Butman). Both of these ford products again served us well – in fact the Windstar was sold to a friend and ended up going nearly 200,000 miles before its ultimate demise. We traded in the Sable for a 2001 4x4 Ford Escape XLT which my wife fell in love with (purchased in September of 2000 again at Gene Butman). Subsequently we purchased another two Windstars (from Briarwood Ford a 2000 & a 2003). And in 2005 when it became apparent that we needed a third car to accommodate the schedules of our teenage son and daughter we purchased a used 1999 Ford Escort for them to use.

It is the 2001 escape (my wife's car) and the 2003 Windstar that have given us more problems than all our other Ford vehicles combined. With respect to the 2003 Windstar – all four passenger doors are rusting out from the bottom, a degree of rust which our original 1995 Windstar did not have even when it gave up the ghost at 197,000 miles in 2004. Briarwood Ford says that because the 2003 Windstar has over 100,000 miles on it there is no coverage for the rust damage as it did not go "through the metal" – this repair represents \$2,000 + in body work according to their body shop.

As for the 2001 Escape it required a new transmission at 50,000 miles (not cover by warranty) and a rebuild of the rear differential at 66,000 miles – two very expensive repairs and has had numerous front-end issues (we had initially chalked this up to buying a new model in its first year of production – something conventional wisdom always cautions against). This vehicle has not been used for anything but city and highway driving and has always been maintained impeccably. With these repairs the vehicle was approaching 130,000 miles (with no body rust I Might add) when on April 5th of this year, at 1 am, it spontaneously burst into flames while parked outside of our house!!!!

Perhaps you can imagine my wife's upset as she watched as "her baby" burned to a crisp in front of her eyes. And then her queasiness as she realized what would have happed if she'd parked the Escape in our basement garage!

The fire started in the engine compartment and by the time the fire department arrived to extinguish the conflagration the entire front end of the vehicle was consumed. A firefighter commented he had heard about such problems with Ford Escapes so I investigated his claim online. I quickly found several articles (including at the NHTSA site) chronicling similar events with other early model Escapes relating to a problem with the ABS system. As in the other cases our car had not been driven for many hours prior to the fire starting (9 hours in our case). However, unlike the other cases we were told by Briarwood Ford that they had "taken care" of the ABS break problem nearly a year ago (either they did not properly correct the ABS problem or the prescribed "fix" was not adequate)!

We are now faced with the prospect of having to purchase a replacement vehicle for the toasted 2001 Escape, in addition to the expensive bodywork required for the 2003 Windstar! I have always made it a point to "buy American" and as a result have never before considered purchasing a foreign make – but (due to recent events chronicled above) for the first time I'm having great qualms about staying with a domestic auto company!

[REDACTED]
Ann Arbor, MI [REDACTED]

1FMYU04131K [REDACTED]

2FMZA51463B [REDACTED]











**Erie
Insurance®**

Claims Office • 18544 Breeze Hill Drive • P.O. Box 4158 • Hagerstown, MD 21741-4158
301.797.5185 • Toll free 1.800.533.5602 • Fax 301.714.9218 • www.erieinsurance.com

Bruce E. Peterson, AIC
Vice President & Claims Manager

July 16, 2008

Ford Motor Company
Attn: Customer Relationship Center
Recalls
PO Box 6248
Dearborn, MI 48126

Hagerstown Ford
Attn: Service Manager
1714 Massey Blvd
Hagerstown, MD 21740



D001504
M. Lynn

FORD MOTOR COMPANY
RECEIVED
CLAIMS UNIT
JUL 23 2008
OFFICE OF THE
GENERAL COUNSEL

RE: Erie Insured: [REDACTED]
Claim #: [REDACTED]
Loss Date: 06/27/2008
Vehicle: 2002 Ford Escape X
VIN: 1FMCU04182K [REDACTED]

Dear Sir or Madame,

We are writing to you to protect our subrogation rights for a fire that occurred at the residence of [REDACTED] our policyholder. The fire originated from her parked 2002 Ford Escape and traveled to her fathers travel trailer and his residence. Ms. [REDACTED] had indicated that she had a recent recall notice in which she took the vehicle to Hagerstown Ford, in Hagerstown, MD. The service was completed. The fire investigation indicates it was an electrical fire and may have originated from the ABS unit in the vehicle's engine compartment. Therefore, we have a right of recovery. We are currently estimating all the damages and will forward our supporting documentation.

Upon receipt of this letter, please contact me to discuss. The vehicle is currently being held at our salvage yard.

Thank you for your time and attention in this matter.

Sincerely,

Christine M. Palamar
Christine M. Palamar
Claim Adjuster, III
(866) 558-6076
PO Box 3515
Hagerstown, MD 21742

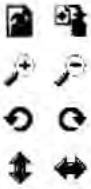
JUL 21 AM '08

CONSUMER AFFAIRS
SECTION

Cc: [REDACTED]

BURNT ENGINE COMPARTMENT

Claim Reference ID: [REDACTED]



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VEHICLE BURNT

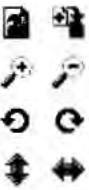
Claim Reference ID: [REDACTED]



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VEHICLE BURNT

Claim Reference ID: [REDACTED]



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BURNT INTERIOR

Claim Reference ID: [REDACTED]



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VEHICLE BURNT

Claim Reference ID



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TriFactor Consultants

INVESTIGATIVE SERVICES

CERTIFIED / LICENSED / INSURED

- PROPERTY AND AUTOMOBILE :
FIRE / EXPLOSION - ORIGIN &
CAUSE INVESTIGATIONS
- AUTO-THEFT INVESTIGATIONS
- SUBROGATION / FRAUD / PRIVATE
INVESTIGATIONS

Date: August 9, 2008

Addressee: Christine Palmer
Erie Insurance
PO Box 3515
Hagerstown, MD 21742

Independent Origin and Cause Investigation

Vehicle: 2002 Ford Escape

Claim: [REDACTED]

Insured: [REDACTED]

Occurred: June 24, 2008

Received: July 1, 2008

Examined: July 9, 2008 at IAA Lot, Brandywine, MD

TriFactor File Number: [REDACTED]

This report is privileged and confidential to the addressee. Its contents are limited to the origin and cause aspects of this fire investigation. The conclusions in this report are based on this investigator's experience, training, and certified expertise in the field of origin and cause investigation. They are also based on the interviews with the principals in this loss, the factual considerations, and the investigative observations, and they take into consideration the official fire investigation findings, when applicable. The opinions in this report are subject to change, if supplemental information becomes available.

In preparing this report, we have been thorough and accurate, have used the accepted methodologies and procedures for origin and cause investigation, and have met the standards that are generally expected from members of the engineering profession and the nationally-accepted NFPA investigative guidelines.

ASSIGNMENT

The loss vehicle is a 2002 Ford Escape XLT [Serial Number 1FMCU04182K [REDACTED]]. It was equipped with a 3.0 Litre / V-6 engine, an automatic transmission, air conditioning, cruise control, an AM - FM stereo system, power windows / locks / sunroof, a towing package, and a 4 x 4 system. The recorded mileage could not be determined because of the extensive fire damage. There were no license tags on the vehicle.

EXAMINATION

The exterior physical condition revealed no collision type body damage. The exterior of the vehicle was fire-damaged, except for the rear hatch and

TriFactor Consultants Investigative Services - 7171 Norris Avenue - Sykesville, MD 21784

Office / FAX (410) 781-7085 - Cellular 443-250-7182 - E-mail: trifactor@comcast.net

RQ09-002 0384LC

the bumper. The automobile glass was missing, except for the rear hatch window. The vehicle was equipped with Continental P235/70R16 tires and custom wheels. The driver's side front tire was fire-damaged. The other tires were intact.

The entire interior of the passenger's compartment had sustained different degrees of heat and smoke damage.

The entire interior of the engine compartment had sustained different degrees of fire damage. The most significant damage had occurred in the rear driver's side of the engine compartment.

There was visible engine oil on its dipstick. There was visible transmission fluid on its dipstick. The power steering fluid could not be checked because its reservoir had been completely consumed. The fuel supply / fuel return lines had been consumed. The battery and the battery cables were fire-damaged.

The burn patterns revealed that the fire had been extremely localized and that it had originated in the rear driver's side of the engine compartment. The wiring within that area exhibited evidence of arcing, fusing, and severing of the electrical wiring that was associated with what appeared to be the ABS Control Module Connector. The degree and type of burning on these conductors were indicative of a rapid and localized fire [i.e. an electrical fire].

INVESTIGATIVE INFORMATION

A major recall from the National Highway Traffic Safety Administration and the Ford Motor Company was issued under NHTSA Campaign, ID Number **07V156000**, on April 23, 2007.

That recall involved the **ABS Control Module Connector** on certain sport utility vehicles, equipped with antilock brakes. The module could overheat, resulting in a burning odor, smoke, and / or a fire. This condition could occur when the vehicle's ignition switch was in the 'Off' position or while the vehicle was being operated. It should be noted that the antilock brake control module connector is mounted on the hydraulic control unit located in the lower driver's side rear of the engine compartment.

It should be noted that this investigator checked the loss vehicle's serial number with the Ford Motor Company's Recall Information Website. The results of that query revealed **no open recalls**.

A vehicle history check revealed that the aforementioned recall had been

addressed on, or about, December 3, 2007. This recall repair might have consisted of just a visual inspection or the actual replacement of the part.

INTERVIEWS

The insured, [REDACTED], was interviewed regarding the events that preceded the fire. Ms. [REDACTED] had purchased the vehicle "used" in August of 2005. She had purchased an extended warranty with it, which was scheduled to expire in August of 2008.

Ms. [REDACTED] stated that the vehicle was parked and secured when the fire occurred. She stated that the last time that the vehicle had been used, prior to the fire, was when her father parked it at approximately 3:30 PM, on June 26, 2008. She stated that the fire was discovered at approximately 4:00 PM, on June 27, 2008.

In response to questions concerning the aforementioned recall that involved the ABS Control Module Connector, Ms. [REDACTED] stated that Hagerstown Ford had reportedly addressed it in December of 2007. She also stated that for approximately two- (2) months after the recall repair had been completed, she noticed that the ABS light would go off and on several times a week while she was driving.

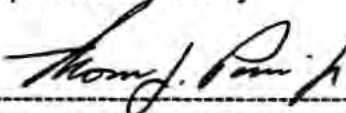
ORIGIN AND CAUSE DETERMINATION

After consideration and evaluation of the evidence and the available facts, it is the professional and expert opinion of this investigator, to a reasonable degree of certainty that this fire originated in the lower rear driver's side of the vehicle's engine compartment.

It is the opinion of this investigator that this fire was **Accidental in Nature** and that it was most probably caused by an electrical failure, involving the ABS Control Module Connector, as was set forth in the aforementioned recall.

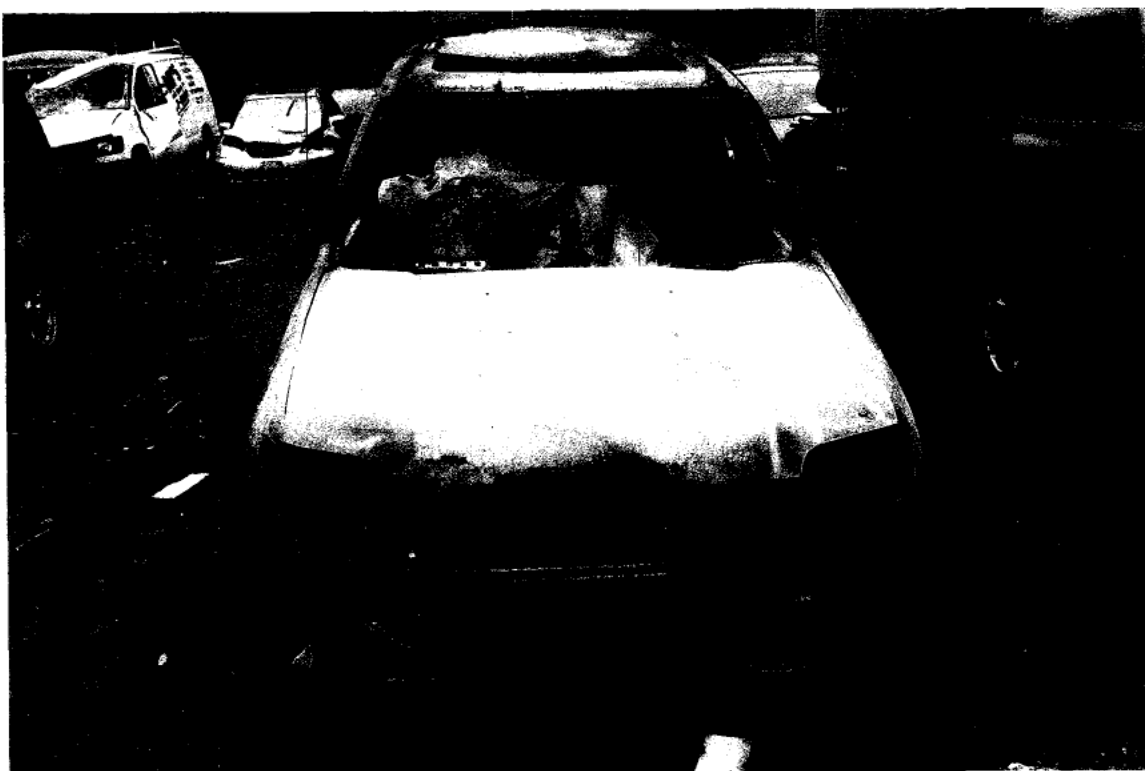
It should be noted that all of the other possible causes for this fire were considered, investigated, and eliminated.

Report submitted by:



Thomas J. Pavis, Jr., CFEI, CVFI, CFE, PI
Certified Fire & Explosion Investigator / Certified Vehicle Fire Investigator
TriFactor Consultants
Enclosure: **EXPENSE REPORT**

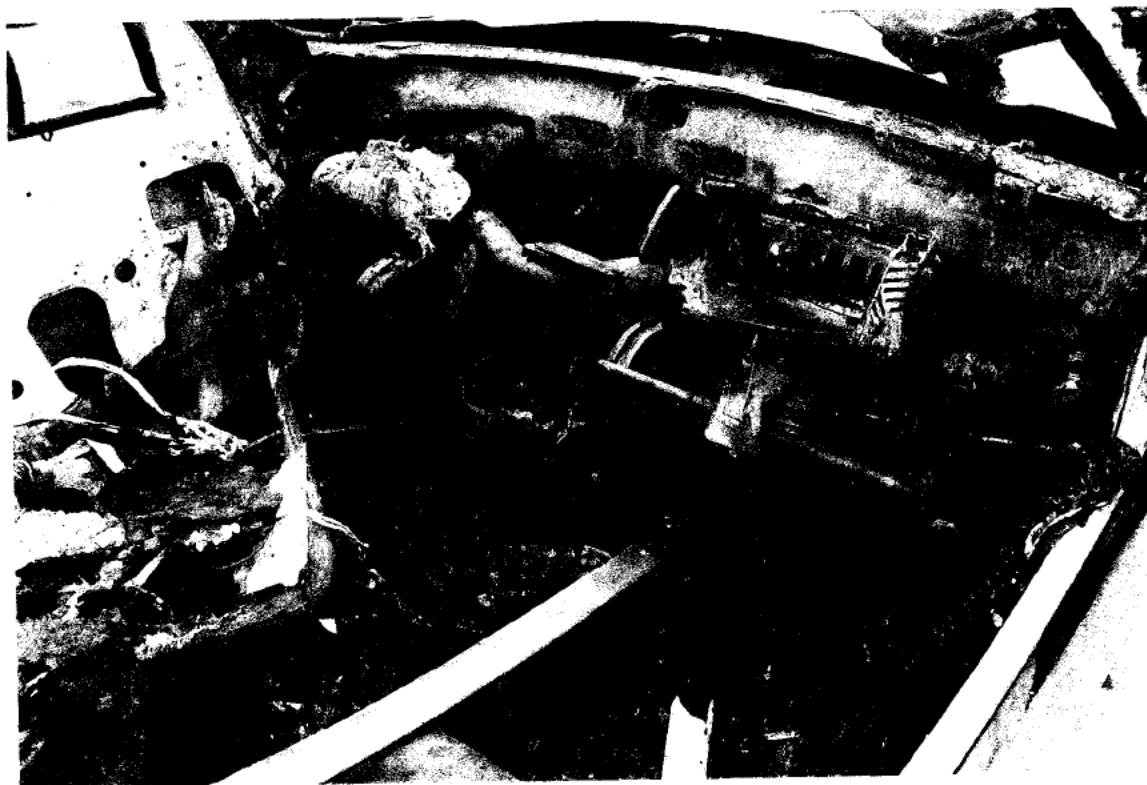
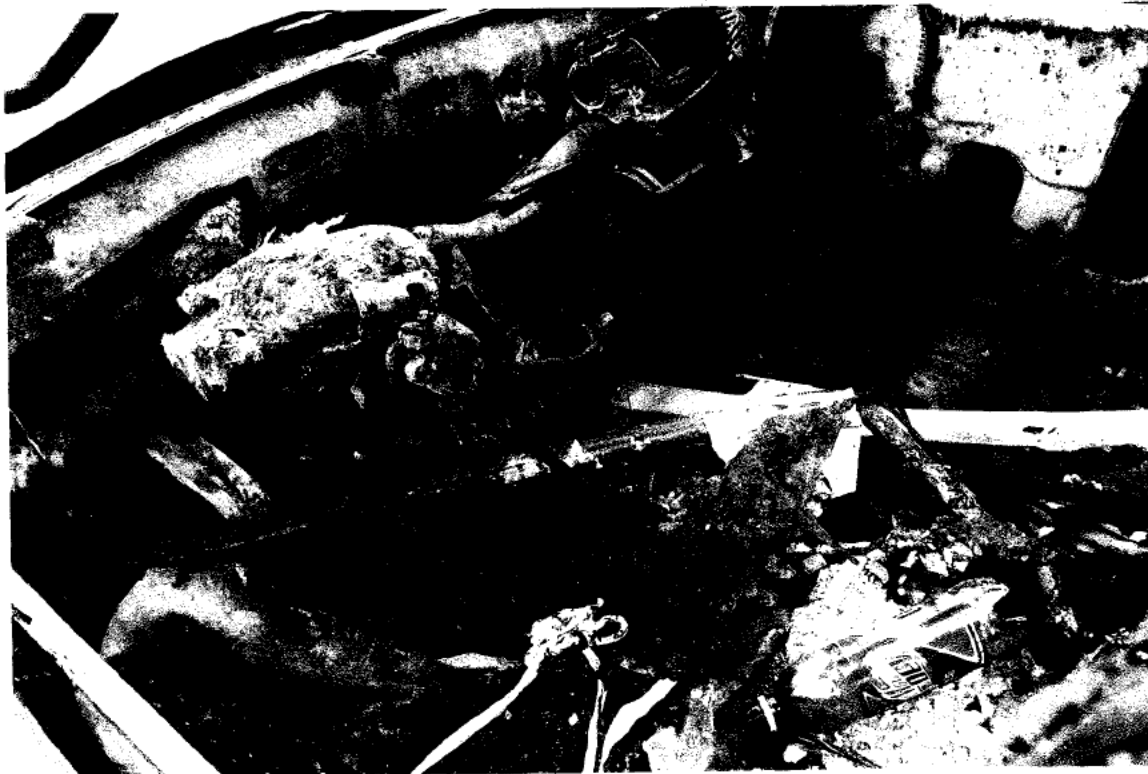
EXTERIOR FRONT AND REAR OF THE LOSS VEHICLE



EXTERIOR SIDES OF THE LOSS VEHICLE



VIEW SHOWING THE INTERIOR OF THE PASSENGER'S
COMPARTMENT



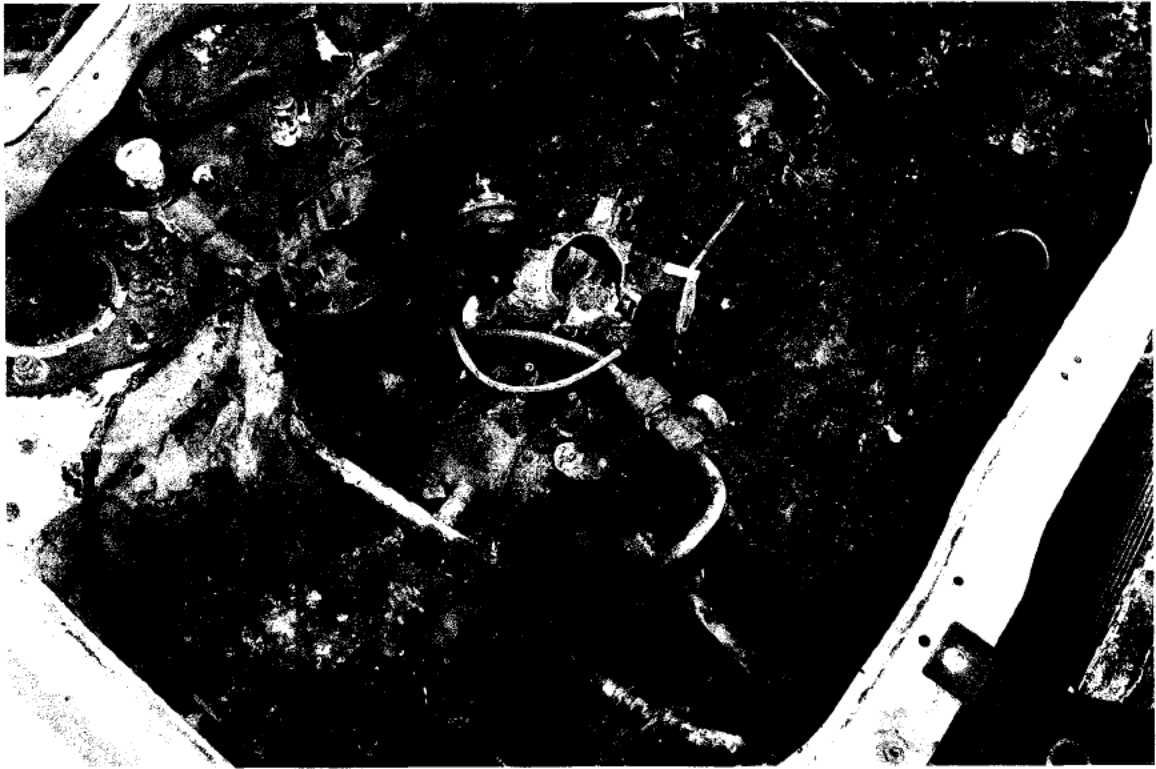
VIEW SHOWING THE INTERIOR OF THE PASSENGER'S
COMPARTMENT



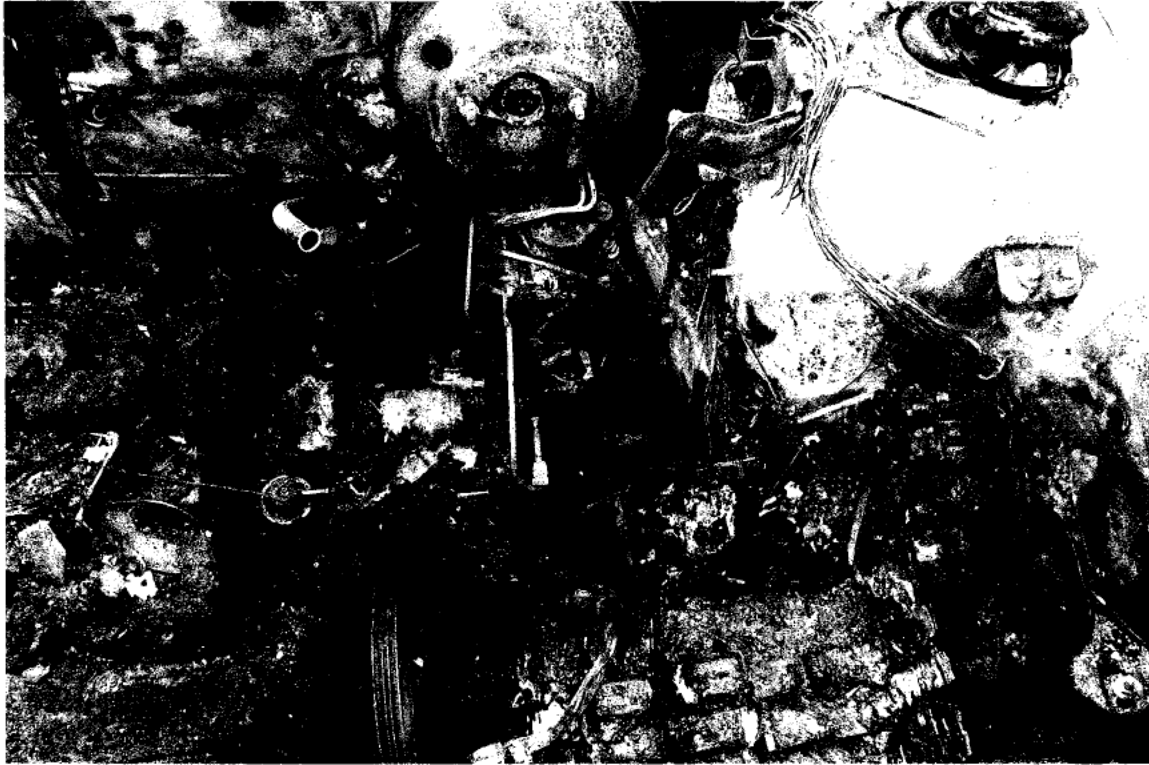
VIEW SHOWING THE INTERIOR OF THE ENGINE
COMPARTMENT



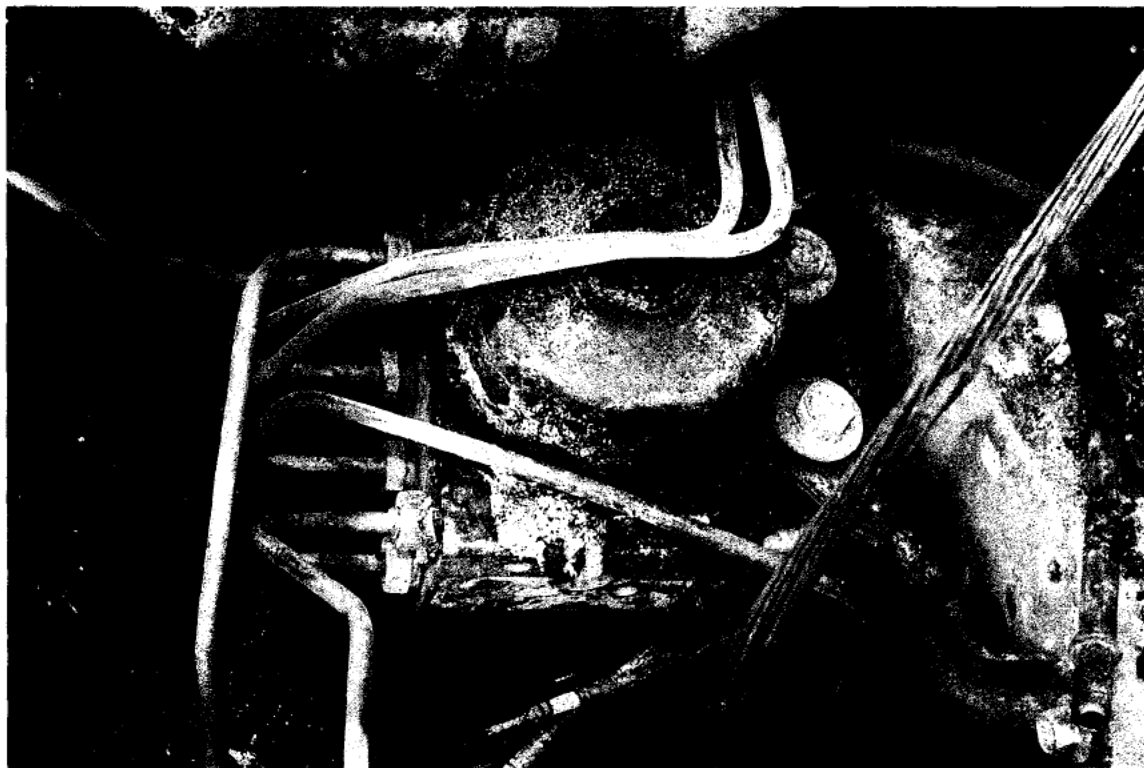
VIEW SHOWING THE INTERIOR OF THE ENGINE
COMPARTMENT



VIEW SHOWING THE INTERIOR DRIVER'S SIDE REAR
OF THE ENGINE COMPARTMENT WHERE THE FIRE
ORIGINATED



VIEW SHOWING THE BURNED REMAINS OF THE
HYDRAULIC CONTROL UNIT LOCATED WITHIN THE
AREA OF ORIGIN



VIEW SHOWING THE BURNED REMAINS OF THE ABS
CONTROL MODULE CONNECTOR THAT WAS
ATTACHED TO THE HYDRAULIC CONTROL UNIT



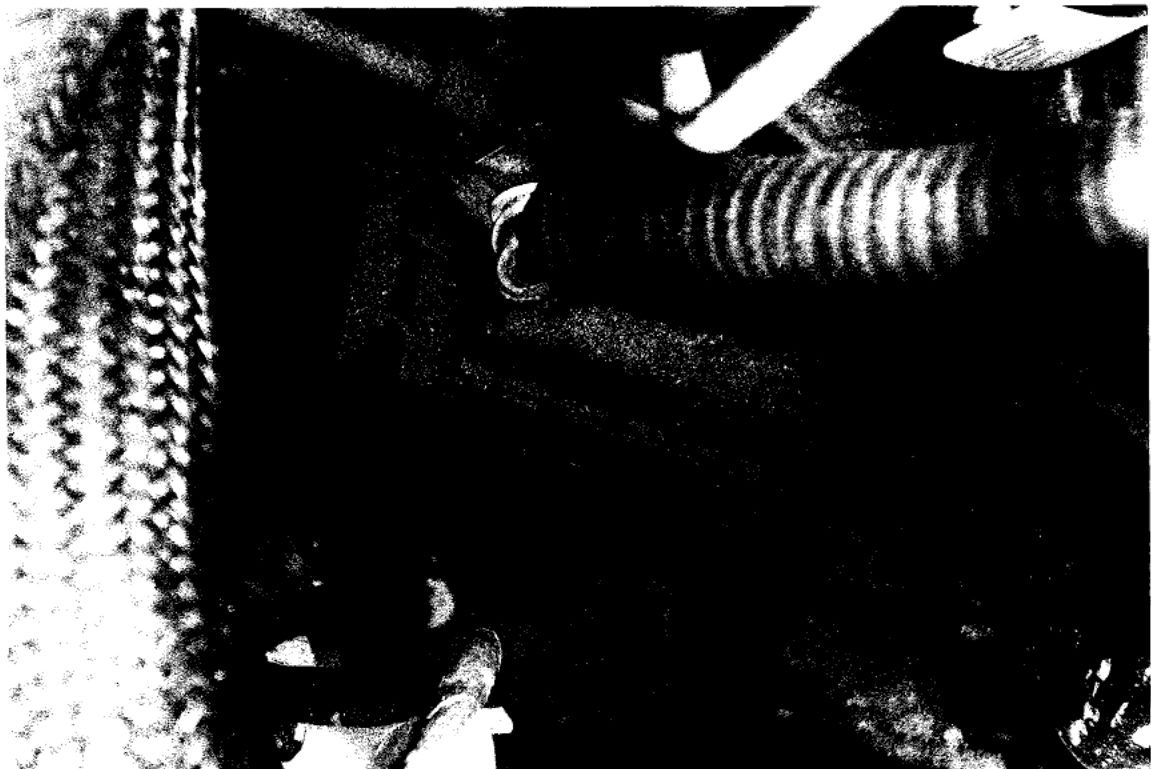
VIEW SHOWING THE BURNED REMAINS OF THE
ELECTRICAL WIRING FOR THE ABS CONTROL MODULE
CONNECTOR



VIEW SHOWING HOW THE ABS CONTROL MODULE
CONNECTOR APPEARED ON ANOTHER 2002 FORD
ESCAPE



VIEW SHOWING HOW THE ABS CONTROL MODULE
CONNECTOR APPEARED ON ANOTHER 2002 FORD
ESCAPE



VIEW SHOWING HOW THE ABS CONTROL MODULE
CONNECTOR APPEARED ON ANOTHER 2002 FORD
ESCAPE



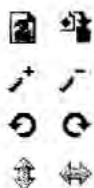
VIEW SHOWING THE VIN PLATE FOR THE LOSS
VEHICLE



VEHICLE BURNT

Cl #

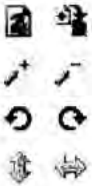
Claim Reference ID: 010220178485001



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VEHICLE BURNT

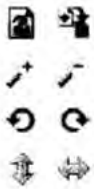
Claim Reference ID: [REDACTED]



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VEHICLE BURNT

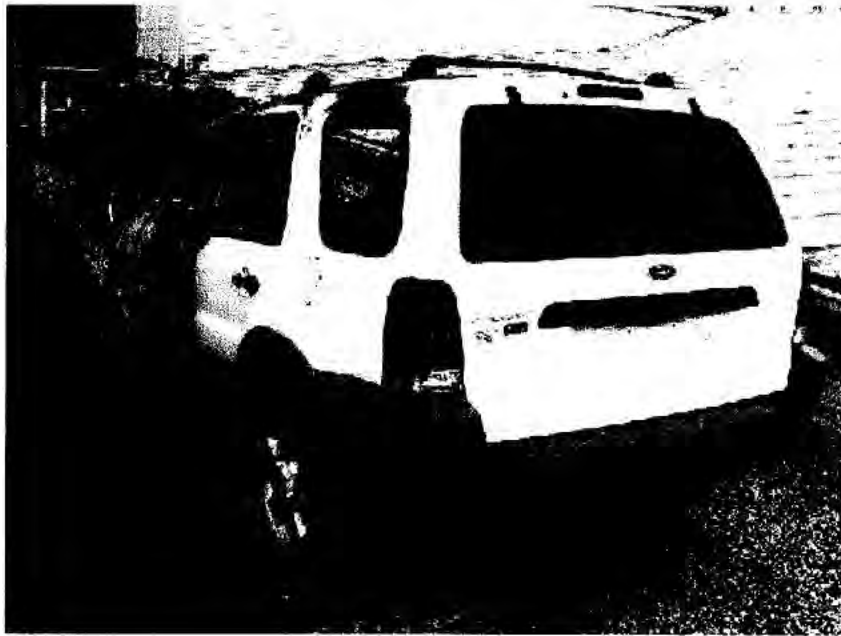
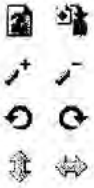
Claim Reference ID: [REDACTED]



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VEHICLE BURNT

Claim Reference ID: [REDACTED]



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Photo Sheet

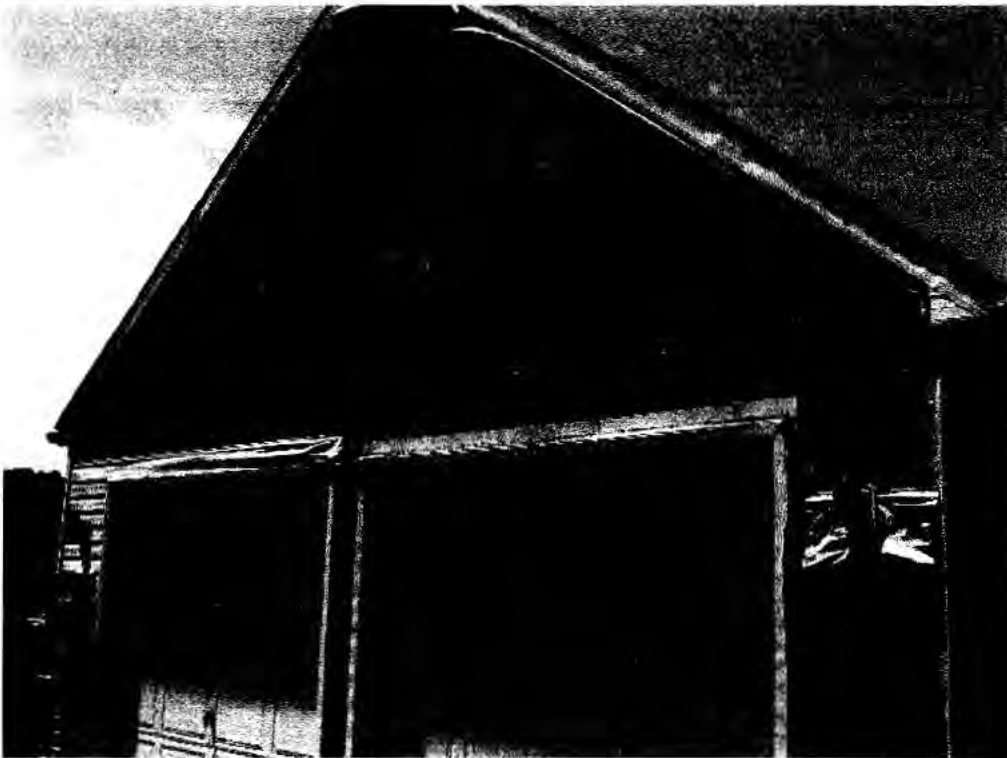
Insured [REDACTED]

Coverage DWL

Erie # [REDACTED]

Policy # [REDACTED]

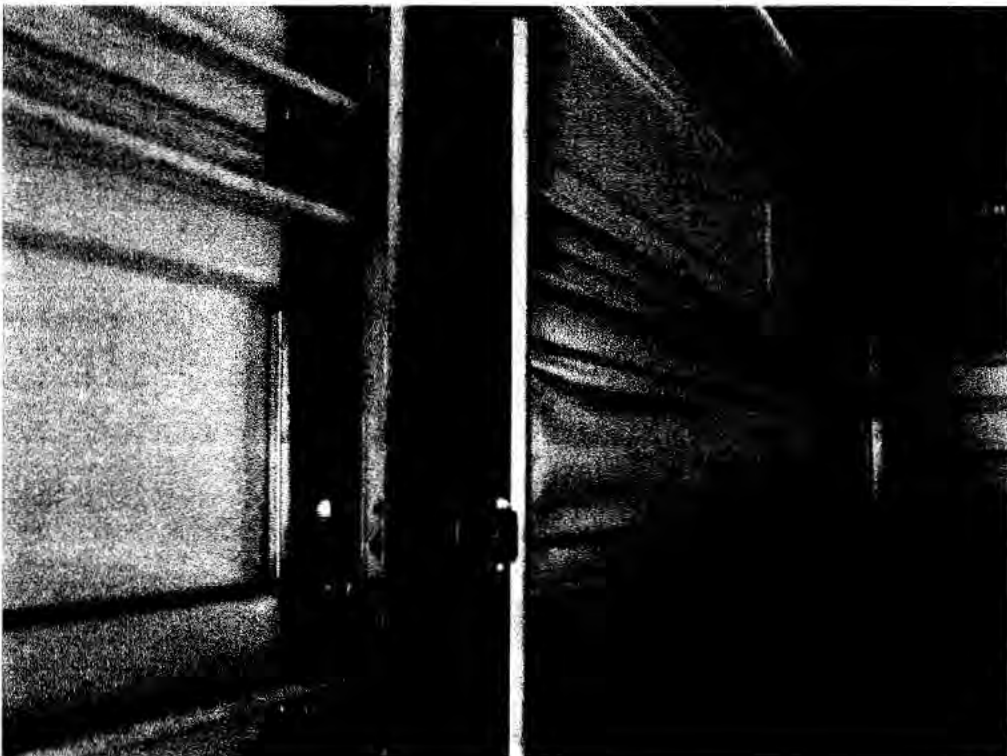
Ins Claim # [REDACTED]



Damaged Garage

[REDACTED]-6/30/08

Siding was melted off of garage due to car fire.



Warped garage door

[REDACTED]-6/30/08

Garage door were warped due to the extreme heat of the fire

Photo Sheet

Insured

Coverage DWL

Erie #

Policy #

Ins Claim #

Repair estimate

6/30/08

Sub-contractor estimate from HPG to replace damaged garage doors.

Repair scope

6/30/08

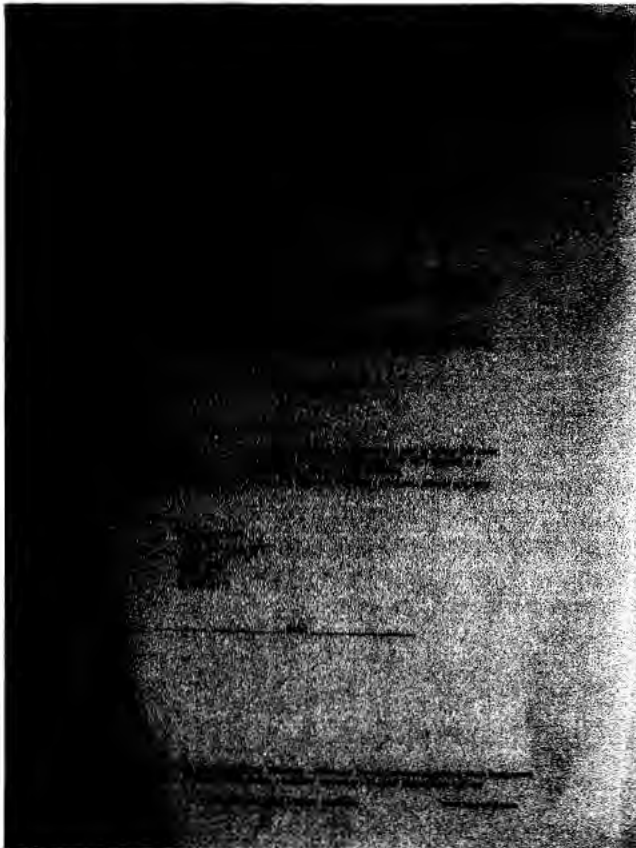


Photo Sheet

Insured

Coverage DWL

Erie #

Policy #

Ins Claim #

Repair estimate

6/30/08

Sub-contractor estimate from HPG to replace damaged garage doors.



Repair scope

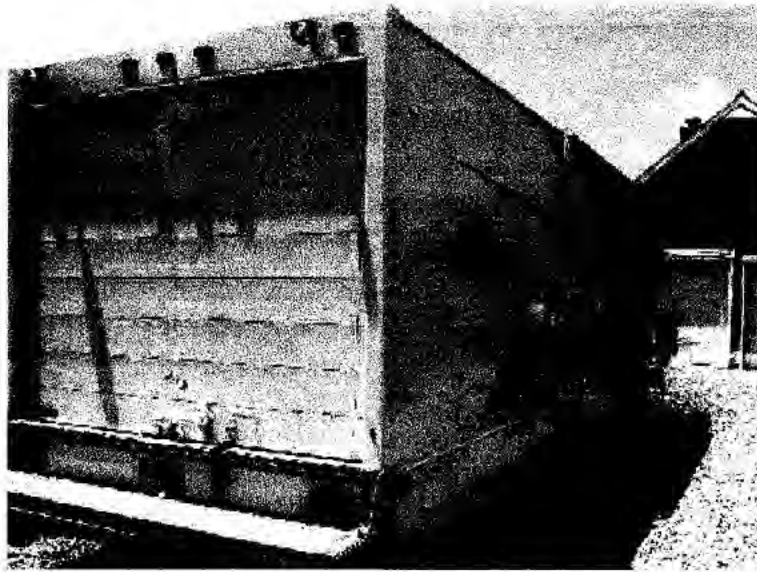
6/30/08



DAMAGETO RT SIDE

Cl #

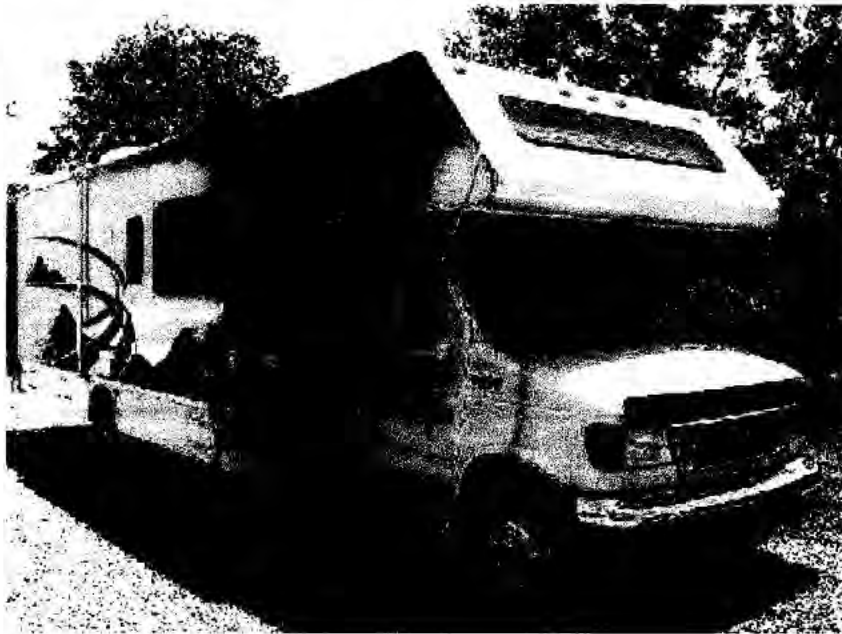
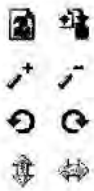
Claim Reference ID: [REDACTED]



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DAMAGETO RT SIDE

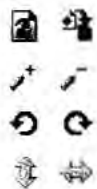
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DAMAGETO RT SIDE

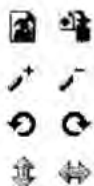
Claim Reference ID:



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DAMAGE TO INTERIOR

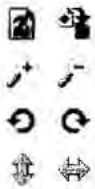
Claim Reference ID: [REDACTED]



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DAMAGE TO INTERIOR & WINDOW

Claim Reference ID: [REDACTED]



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DAMAGE TO INTERIOR

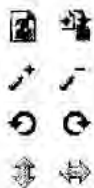
Claim Reference ID



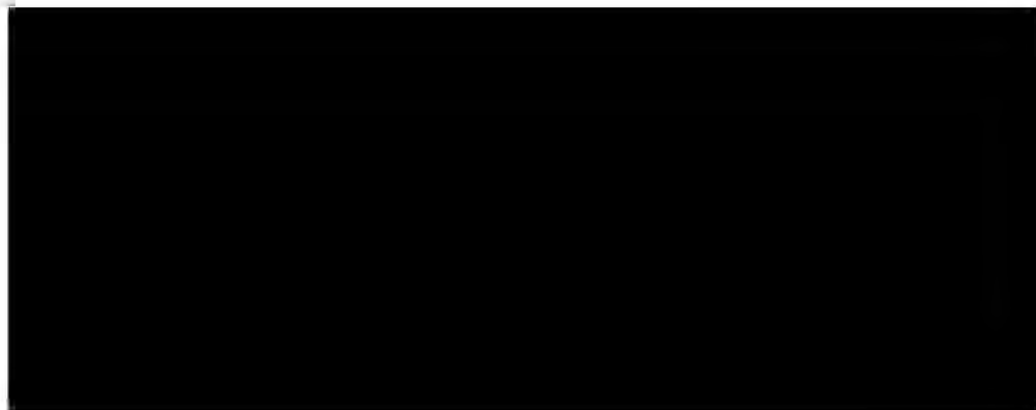
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DAMAGE TO CEILING

Claim Reference ID: [REDACTED]



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BEGINNING OF CONTACT
08/30/2008

VOICE OF THE CUSTOMER TRACKING SYSTEM

08.00.04

REGION: S1 ATLANTA OGC ISSUE CASE NBR: 0393042428
VIN: 1FMCU04171K ZONE: A06 OPENED: 08/29/2008
ENGINE: 1 VEH TYPE: T CLOSED: 08/29/2008

LAST NAME: [REDACTED] STATUS: CLOSED
TITLE: [REDACTED] FIRST NAME: [REDACTED]
ADDRESS: [REDACTED]
CITY: BLUFFTON STATE: SC ZIP: 29910
HOME PHONE: [REDACTED]
MODEL YEAR: 2001 MODEL: ESCAPE XLT 4X4
MILEAGE: 104000
DEALER NAME: O C WELCH FORD LINC SALES CODE: F21246 P & A: 01018
REASON CODE: 0796 LEGAL - ALLEGED INJURY
SYMPTOMS: 704100 FIRE/SMOKE VISIBLE FLAME

ORIGIN: CACI38 - US CONCERN CASE BASE COMMUNICATION: PHONE
ACTION: 705 - CONTACT ADVANCED TO OGC
DOCUMENT: ANALYST: MSPALL1 MARILYN SPALL, MARILYN SPALL

FORD MOTOR COMPANY
RECEIVED
CLAIMS UNIT

DATE: 08/29/2008 TIME: 10.55.03;
ACTION DATA/COMMENTS:

SEP 02 2008

OFFICE OF THE
GENERAL COUNSEL

CUSTOMER SAID: -VEH CAUGHT FIRE 8/28/08 AROUND 3:15 PM-CUST FEELS FIRE CAUGHT ON FIRE DUE TO RECALL FOR THE ANTI LOCK BRAKE MODULE-CUST GOT A LITTLE BURNED BUT DID GET FIRE OUT, DID NOT GO TO HOSPITAL-FIRE WAS AT THE WIRING HARNESS HOOK UP BY THE ANTI LOCK BRAKE MODULE--VEH WAS RUNNING WAS DRIVING DOWN ROAD STOPPED AT LIGHT AND NOTICED SMOKE FORM FRONT OF VEH-GOT TO PARKING LOT, POPPED HOOD SAY FIRE, PUT OUT WITH FIRE EXTINGUISHER HAD TO TRY SEVERAL TIMES TO GET IT OUT-FIRE DEPT DID COME BUT FIRE WAS OUT BY THE TIME THEY GOT THERE, HILTON HEAD FIRE DEPT, THEY TOOK INFORMATION DOES NOT HAVE REPORT NUMBER, DOES NOT KNOW FINDINGS-HILTON HEAD FIRE DEPT, BEAUFORT COUNTY, SOUTH CAROLINA-NO DAMAGE TO ANYTHING BUT VEH-HAS NOT CALLED INSURANCE COMPANY YET, ENCOMPASS INSURANCE, 800-588-7400, NO CLAIM FILED YET-VEH AT INDEPENDENT SHOP SAID IT CAN BE REPAIRED BUT IT WOULD BE COSTLY, CUST NOT SURE-NO ATTORNEY MENTIONED -VEH WAS RUNNING BUT STOOPED AT STOP SIGN-CUST RESEARCHED ON INTERNET AND WENT TO DLR WITH INFO AND TALKED TO S/M STEVE CUMMINGS OPS DIRECTOR, HE WAS SYMPATHIC AND SAID VEH WAS INSPECTED FOR THIS AND WOULD CALL FORD AND CALL CUST BACK-S/M SAID MAYBE FORD WILL FIX VEH AND PAY FOR A RENTAL WHILE VEH IS BEING FIXED-HE CALLED CUST BACK AND SAID FORD SAID NOTHING THEY CAN DO AS IT WAS INSPECTED 9/22/07 88000 MILES-CUST SEEKING, FOR FORD TO FIX VEH AND PAY FOR A RENTAL WHILE VEH IS BEING FIXED-IS VERY UPSET-DEALER SAID: O C WELCH FORD LINCOLN MERCURY 4920 INDEPENDENCE BLVD HARDEEVILLE, SC 29927 TEL: (843) 288-0100 CRC ADVISED: I WILL FORWARD THIS INFORMATION TO THE FORD OFFICE OF THE GENERAL COUNSEL. YOU WILL RECEIVE WRITTEN NOTIFICATION WITHIN 10 BUSINESS DAYS WHICH YOU WILL NEED TO RESPOND TO IN WRITING, NOTE TO CCR: REMEMBER TO VERIFY ALL CUSTOMER CONTACT INFORMATION BEFORE SENDING ISSUE -CONFIRMED BELOW: MR [REDACTED] BLUFFTON, SC [REDACTED]





American National Corporate Centre
1949 East Sunshine
Springfield, MO • 65899-0001
417-887-0220 • Fax 417-887-1801
<http://www.anpac.com>

Subro
American National Property And Casualty Co.
American National General Insurance Co.
American National Lloyds Insurance Co.
Pacific Property And Casualty Co.
ANPAC Louisiana Insurance Co.
American National County Mutual Insurance Co.

July 21, 2008

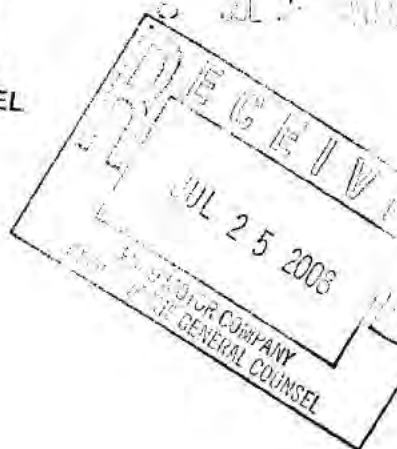
Ford Motor Company
ATTN Claims Department
Po Box 6248
Md-3ne-B
Dearborn MI 48126

Re: Our Claim #: [REDACTED]
Date of Loss: June 11, 2008
Our Insured: Olszewski, Ian
Our Policy #: [REDACTED]
Your Insured: Ford Motor Company
Po Box 6248
Md-3ne-B
Dearborn MI 48126
Your File #: NOT GIVEN

FORD MOTOR COMPANY
RECEIVED
CLAIMS UNIT

JUL 25 2008

OFFICE OF THE
GENERAL COUNSEL



We have been informed that you are the insurance carrier for the party designated in the caption of this letter. Our investigation of this fire loss established that you are responsible for this fire.

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 customer. 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.

Please accept this letter as notice of our subrogation rights. We have made the following payments and request reimbursement for \$11,575.00 as shown below:

COVERAGE	TOTAL
COMPREHENSIVE	\$11,300.00
CAR RENTAL (COMP)	\$275.00
Total of claim	\$11,575.00

Enclosed is the support of our loss. The burned vehicle is being held if you need to inspect the unit.

Sincerely,

Cindy Dennis

Cindy Dennis
Senior Subrogation Specialist
American National Property And Casualty Co

Enc.



"Members of the American National Family of Companies"

Total Present: 1
801: Paid Non-Paid

DENT COUNTY FIRE PROTECTION DISTRICT
#2 S MAIN ST
SALEM, MO 65560

INCIDENT # 2008-2022

INCIDENT COMMAND 803 TYPE VEHICAL FIRE 10170
DATE 6-11-08 ALARM TIME CALL 1820 PAID 1823
REPORTING PERS [REDACTED] PHONE # [REDACTED]
LOCATION [REDACTED] DIRECTIONS [REDACTED]
PROPERTY OWNER JAN'S AMANDA DISZEWSKI PHONE # [REDACTED]
ADDRESS [REDACTED] CITY Salem STATE MO
OCCUPANTS N/A PHONE # N/A
ADDRESS N/A CITY N/A STATE N/A
IN SERVICE TIME 1829 ARRIVAL TIME 1835 UNDER CONTROL TIME 1844
RETURN TO STATION 1912 FIRE MARSHALL NOTIFIED? Y ☐ N ☒ TIME [REDACTED]
CONDITION UPON ARRIVAL ONE VEHICAL FULLY INVOLVED
SMOKE DETECTOR? Y ☐ N ☐ LOCATION [REDACTED]
TYPE OF ACTION TAKEN [REDACTED] MUTUAL AID: Given ☐ Rec'd ☐
MUTUAL AID AGENCY [REDACTED]
POINT OF IGNITION [REDACTED] DAMAGE [REDACTED]
CAUSE OF FIRE [REDACTED]
INSURANCE Y ☐ N ☐ COMPANY NAME [REDACTED]
VEHICLE INVOLVED: YEAR 2004 MAKE Ford MODEL SCAPE
LICENSE # [REDACTED] STATE MO VIN # [REDACTED]
PERSONS INJURED? Y ☐ N ☒ NAME [REDACTED]
HUMIDITY [REDACTED] WIND [REDACTED] TEMPERATURE [REDACTED]
TOWNSHIP 34N RANGE 6W SECTION 28
REPORT BY [REDACTED]

COPY

6 RECEIVED

JUN 24 08

FIRE SCENE EXAMINATION

On June 19, 2008, I arrived at the location of the fire loss reported by Mr. [REDACTED] that occurred to his 2004 Ford Escape. This vehicle was located at Mr. [REDACTED] residence at [REDACTED] in Salem, Missouri. Mr. [REDACTED] met me at the location and explained that his wife had been driving the vehicle the day of the fire. She had returned home around four in the afternoon and it wasn't until the next day she tried to start the vehicle and found the battery was dead. According to Mr. [REDACTED] she called him at work and told him the car would not start and the battery was dead. He told her he would take care of it after work. Mr. [REDACTED] said he got home around four and tried to start the vehicle and the battery was still dead. At that time he used a second vehicle to jumpstart Mrs. [REDACTED] vehicle and it started right up. According to Mr. [REDACTED] he let the vehicle run for about twenty minutes then shut it off, restarted it, and it started fine. Mrs. [REDACTED] stated that the days prior to the fire the ABS warning light had come on. She stated that the brakes were fine and she could stop properly but she had not had a chance to have it checked out. It was approximately thirty to forty minutes and Mr. [REDACTED] finished with the vehicle he heard the alarm sounding on the vehicle. He instantly thought he was pressing against the key remote until he noticed he did not have the keys. He went outside to see what the problem was and found the vehicle on fire. Mr. [REDACTED] first saw fire inside the vehicle and not in the engine compartment. He got the garden hose and started applying water while his wife called the fire department. Mr. [REDACTED] said he was able to contain the fire to the interior for a short while. The fire became too large to deal with and he began applying water to just the exterior of the passenger's side trying to save the tires from blowing. At the time the fire department arrived the vehicle was totally burning with the exception of the area in the engine compartment. Mr. [REDACTED] stated it wasn't until the fire department arrived they opened the hood and extinguished what fire was within the engine compartment. According to Mr. and Mrs. [REDACTED] they did not know of any problems with the vehicle except the fact that the ABS light was on in the instrument panel.

Examination of the vehicle found very heavy fire damage to the entire vehicle. A very small area on the front of the hood, the passenger's side front fender, and a very thin line above the passenger's rear tire still showed signs of paint. The front bumper was melted at the top next to the grill with the majority of the plastic on the lower section still in place. There was heavy fire damage to the interior of the vehicle with all materials and plastics burned away.

The exterior of the vehicle showed no signs of external wreckage or body damage with the exception of where the fire department made entry into the engine compartment on the

driver's side front fender. The two tires on the driver's side had been involved with the fire and the two tires on the passenger's side were still inflated with minor damage.

Interior examination found very heavy damage with no signs of remaining plastic or materials. The dash was completely consumed by the fire leaving only the steel supports. The stereo was on the floor between the seats where it fell during the fire. The remaining wires within the dash area had very heavy fire damage with severe heat to the extent that several wires were destroyed. All damage seen to the wires appeared to be from the fire with no remaining signs of any failures.

The driver's side floor after debris removal had remains of carpet and padding. The falling debris protected the materials allowing the lower materials to remain.

The fire damage to the engine compartment showed very heavy damage to the top of the engine along with damage at the rear next to the header wall. The damage showed the fire appeared to be heavier on the driver's side next to the header wall. The front of the engine still had rubber hoses and some plastic parts still in place next to the radiator. Examination also located several wires next to the front of the engine still intact. The fire damage to the engine showed the heaviest damage was to the rear on the driver's side.

Examination of the brake cylinder found heavy melting and heavy fire damage to the brake booster. The area behind the booster on the header wall had signs of heavy fire damage.

The battery was still in place on the driver's side fender including the remains of the battery cables. The cables appeared to be attached with no signs of any failures.

Examination of the underside of the vehicle did not find any signs that the fire had spread from under the vehicle and upward into the interior. All drive line and running gear appeared to be intact.

3 RECEIVED
JUL 02 08

FIRE SCENE EXAMINATION CONCLUSION

This fire is classified as undetermined for the following reasons. Examination of the vehicle found very heavy fire damage to the entire vehicle with the heaviest damage to the interior and the engine compartment next to the header wall. No signs that the fire had originated away from the vehicle and spread into the vehicle were found. There was heavy fire damage to the rear of the engine next to the header wall on the driver's side with less damage next to the front of the engine. There were no signs of abnormal burning within the engine compartment. Remains of carpeting and padding were found on the floor on the driver's side indicating no abnormal low burning. Several of the wires did not show any signs of failures but with the extent of heavy damage a failure would have been difficult to locate. Examination of current recalls found one had been issued for the ABS module, which can result in a short and failure resulting in a fire. According to the owner, she had seen the ABS warning light on prior to the fire. On the day prior to the fire the vehicle had been parked and during that time the battery had drained to a point that it would not start the vehicle indicating a current draw. After the vehicle had been jumpstarted and run for a while all appeared to be normal until a short time later the vehicle was found on fire.

Because of a recall on this vehicle a detailed examination was not completed in order to preserve the damage patterns and integrity of the vehicle. Due to the possibility of a fire being caused by a failure within the electrical system and possibly the brake wiring, the examination was concluded until a further examination would be warranted leaving this cause as undetermined.

3 RECEIVED
JUL 02 '08

ADDENDA

1. Copy of the Recall Pertaining to this Vehicle
2. Photographic Documentation Log
3. CD Copy of all Report Information Including all Photographs

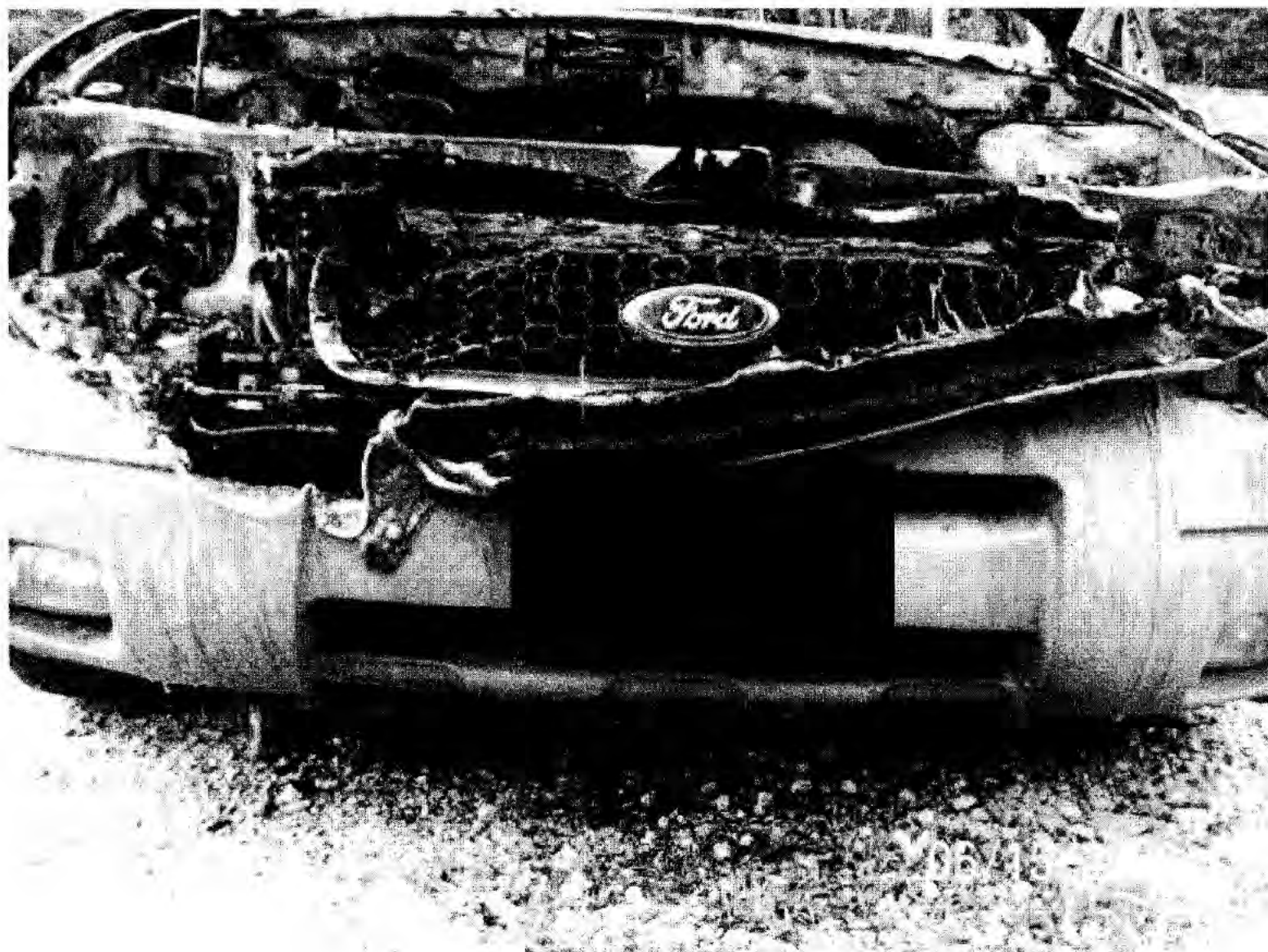
Kuticka Fire Investigations, L.L.C.

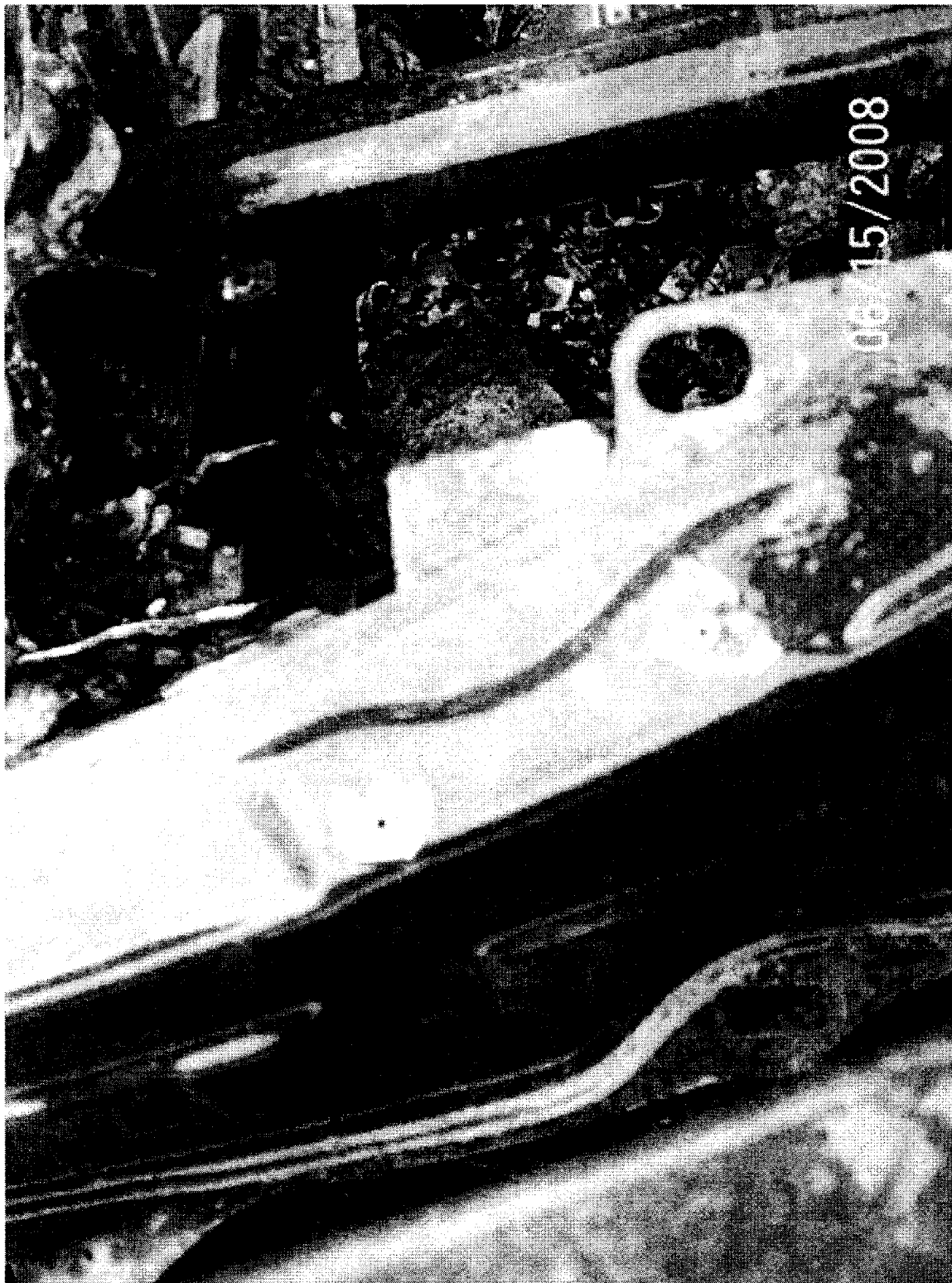


By: Steve Russell
Investigator

Encl.

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JUL 02 08

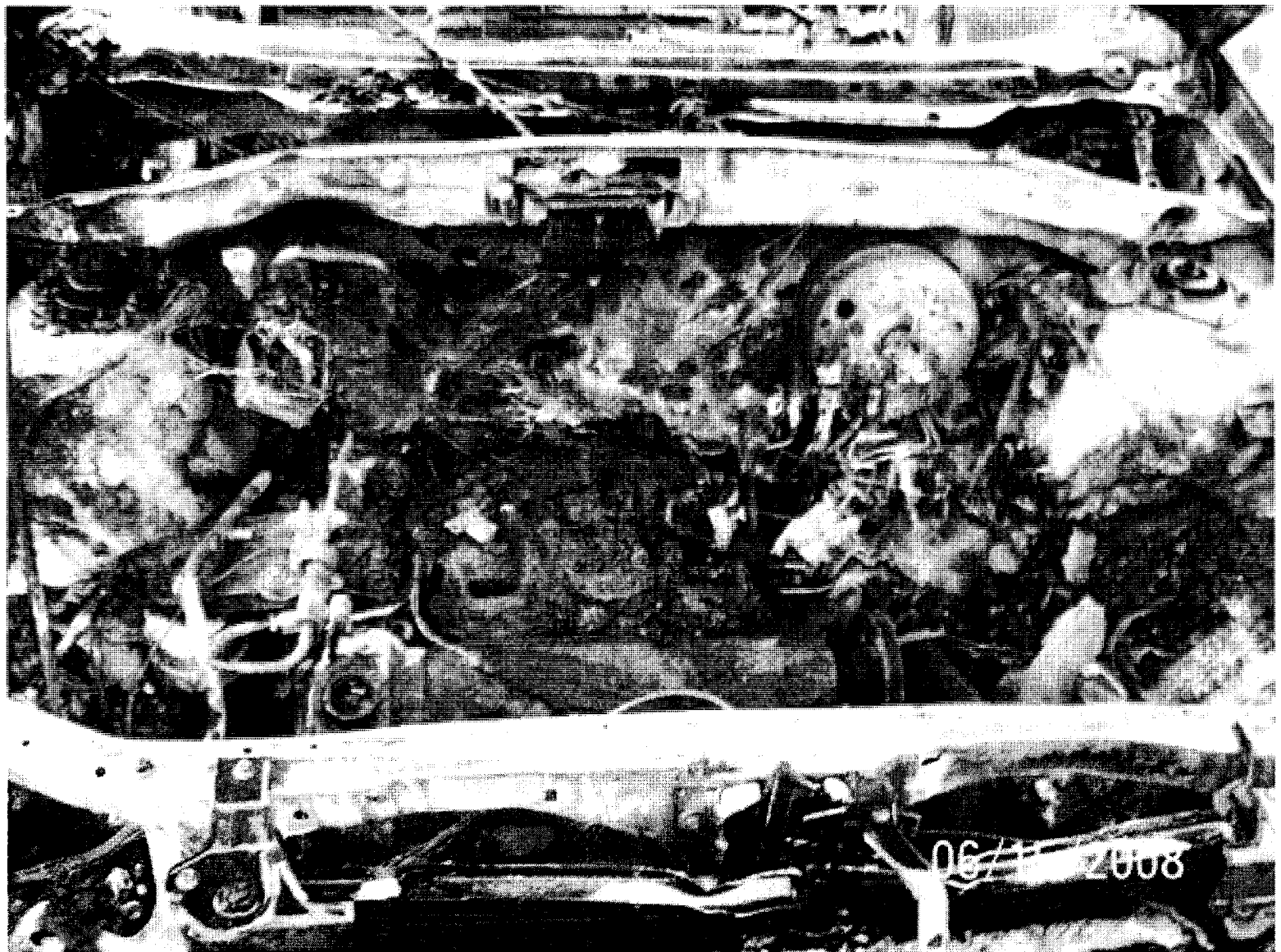




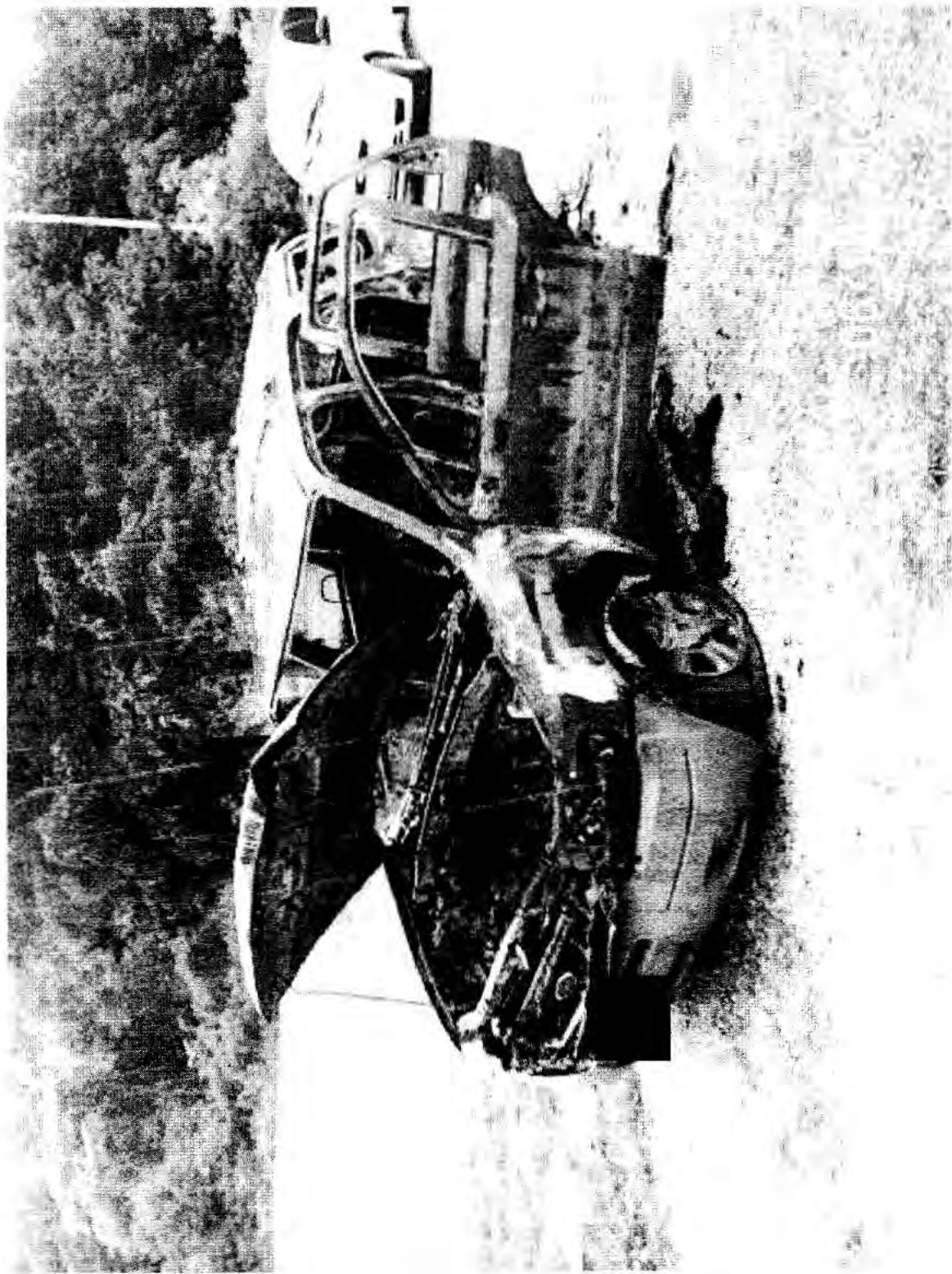


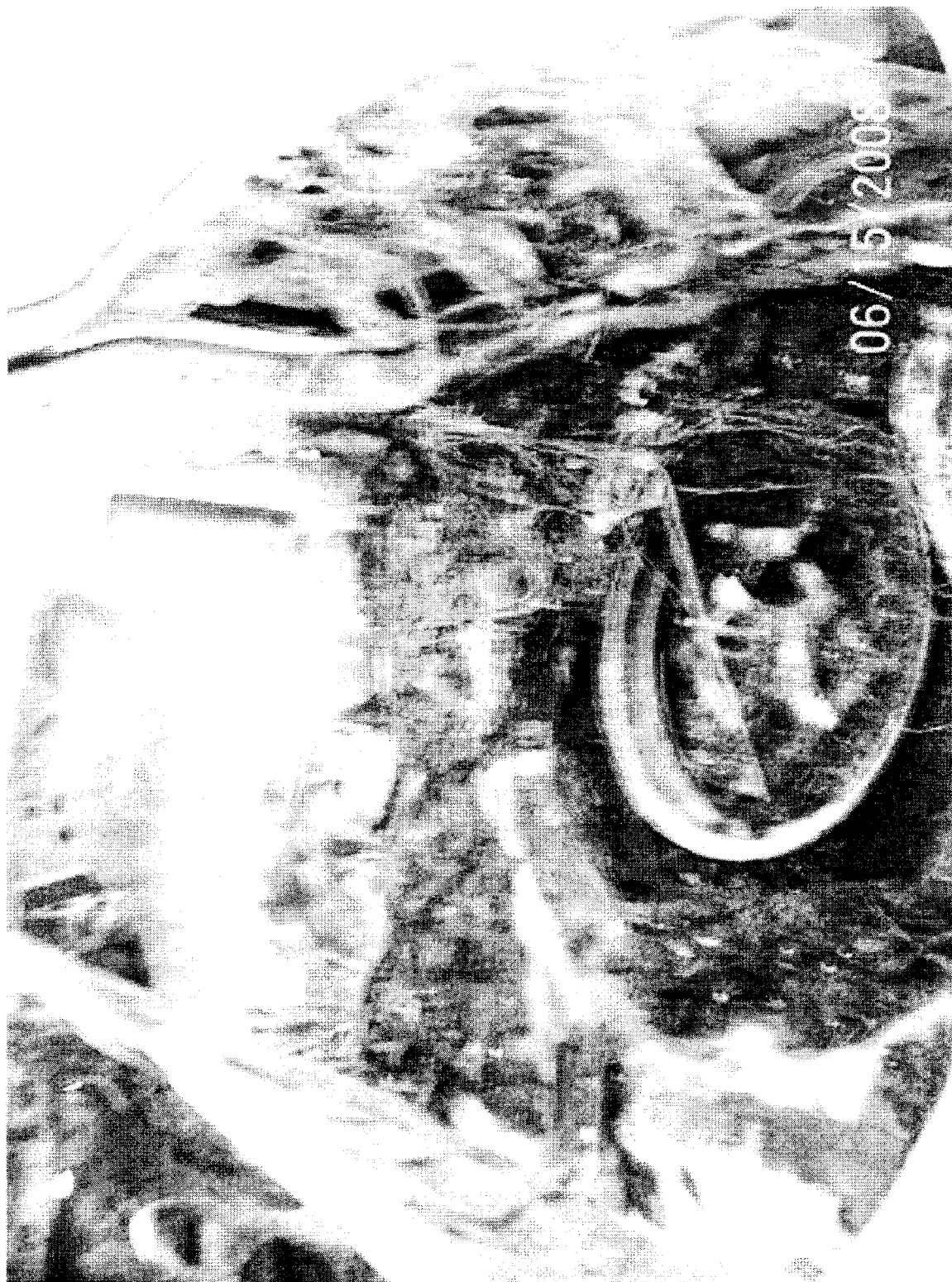


RQ09-002 0427LC



















Kuticka
FIRE INVESTIGATIONS

P. O. Box 1275 Nixa, Missouri 65714-1275

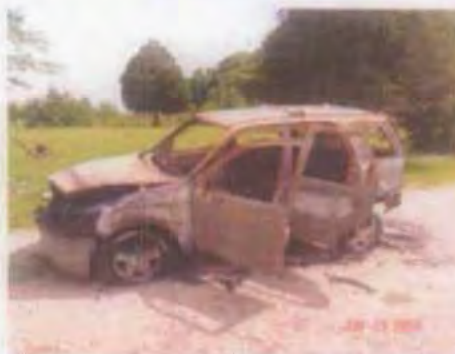
Phone Number 417-743-3041 Fax Number 417-743-2204

ashdigger@sbcglobal.net

Web Page: kfinvestigations.com

June 26, 2008

American National Property and Casualty
1949 East Sunshine
Springfield, Missouri 65899-0001



Attention: Kristy McCaskill

Re: Insured: [REDACTED]
Co. Claim Number: [REDACTED]
Policy Number: [REDACTED]
Date of Loss: 06-11-08 (Fire)
KFI: 2008-80

FIRST AND FINAL REPORT (ORIGIN AND CAUSE)

REQUESTED WORK

A fire scene origin and cause examination conducted on a vehicle that was involved in a fire on June 11, 2008.

ASSIGNMENT FACTS

On June 11, 2008, a fire resulted in a 2004 Ford Escape owned by Mr. [REDACTED] located at [REDACTED] in Salem, Missouri.

Confidentiality Notice: The documents accompanying this report contain confidential information belonging to the sender which is legally privileged. The information is intended only for the use of the individual or entity recipient named above. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution or the taking of any action in reliance on the contents of this report is strictly prohibited. If you have received this report in error, please notify us by telephone to arrange for the return of the original documents to us.

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JUN 2 2008

Kuticka
FIRE INVESTIGATIONS
Photographic Log Sheet



Photo 1
Photograph taken
showing the damage
to the front of the
vehicle



Photo 2
Photograph taken
showing the driver's
side and the large
amount of damage

3 RECEIVED
JUN 20 2008

Kuticka
FIRE INVESTIGATIONS
Photographic Log Sheet



Photo 3
Photograph taken
showing the damage to
the rear and the distance
from the residence



Photo 4
Photograph taken
showing the
passenger's side along
with the two tires that
remained this was the
location where the
owner was at with the
garden hose during the
fire

3 RECEIVED
JUN 20 2008

Kuticka
FIRE INVESTIGATIONS
Photographic Log Sheet



Photo 5
Photograph taken
showing the damage
to the front grill area



Photo 6
Photograph taken
showing the fire pattern
on the hood with the
heaviest damage near
the rear of the hood
above the area where the
heaviest damage was
within the engine
compartment

3 RECEIVED
JUN 2 2008

Kuticka
FIRE INVESTIGATIONS
Photographic Log Sheet



Photo 7
Photograph taken
showing the very
heavy damage to the
interior from the
driver's side



Photo 8
Photograph showing
the damage to the area
around the steering
wheel

3 RECEIVED
11.02.08

Kuticka
FIRE INVESTIGATIONS
Photographic Log Sheet



Photo 9
Photograph taken
showing the damage to
the passenger's side
with the heater cores
and the remains of the
stereo on the floor



Photo 10
Photograph taken
showing the entire
vehicle's interior with
heavy damage

3 RECEIVED
JUN 02 08

Kuticka
FIRE INVESTIGATIONS
Photographic Log Sheet



Photo 11
Photograph taken
showing the damage to
the engine compartment



Photo 12
Photograph showing the
large amount of damage
to the passenger's side
of the engine
compartment

3 RECEIVED
JUN 02 08

Kuticka
FIRE INVESTIGATIONS
Photographic Log Sheet



Photo 13
Photograph showing the
driver's side of the
engine compartment
along with the location
of the battery



Photo 14
Photograph taken
showing the area with
the heaviest damage at
the rear of the engine
and the damage next
to the header wall also
showing the remaining
rubber hoses at the
front next to the
radiator

3 RECEIVED
JUN 19 2008

Kuticka
FIRE INVESTIGATIONS
Photographic Log Sheet



Photo 15
Photograph taken
showing the remains
of the carpet and
padding on the
driver's side front
floorboard



Photo 16
Photograph taken
showing no signs of
any fire damage to the
under carriage or fuel
tank

3 RECEIVED
JUN 20 2008

JUN 19 2008



BEGINNING OF CONTACT
10/17/2008

VOICE OF THE CUSTOMER TRACKING SYSTEM

08.00.04

REGION: S2 CHARLOTTE OGC ISSUE CASE NBR: 0359302758
VIN: 1FMYU93133K ZONE: A04 OPENED: 10/16/2008
ENGINE: 1 VEH TYPE: T CLOSED: 10/16/2008
LAST NAME: [REDACTED] FIRST NAME: [REDACTED] STATUS: CLOSED
TITLE: [REDACTED] MI: [REDACTED]
ADDRESS: [REDACTED]
CITY: SE/MA STATE: NC ZIP: [REDACTED]
HOME PHONE: [REDACTED]
MODEL YEAR: 2003 MODEL: ESCAPE XLT 4X4 4-DR
MILEAGE: 98000
DEALER NAME: CLASSIC FORD LINCOLN SALES CODE: F21614 P & A: 04452
REASON CODE: 0792 LEGAL - ACCIDENT / FIRE
SYMPTOMS: 704300 FIRE/SMOKE SCORCHED/BURNT

ORIGIN: CACI38 - US CONCERN CASE BASE COMMUNICATION: PHONE
ACTION: 792 - CONTACT ADVANCED TO OGC - FIRE
DOCUMENT: ANALYST: JWIXTED WIXTED JANET

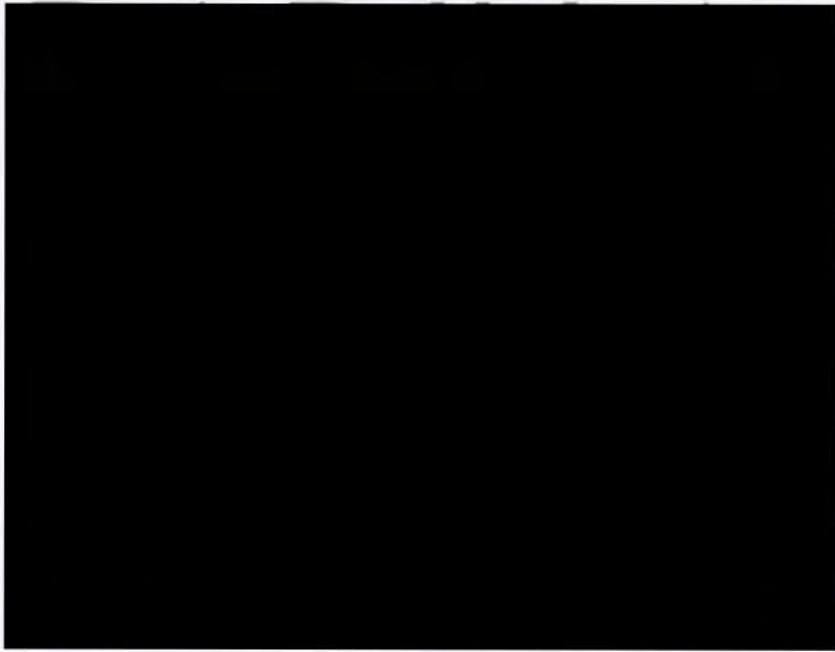
FORD MOTOR COMPANY
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CLAIMS UNIT

DATE: 10/16/2008 TIME: 10.02.08;
ACTION DATA/COMMENTS:

OCT 17 2008

OFFICE OF THE
GENERAL COUNSEL

CUSTOMER SAID: =AS PER HISTORICALS==RECALL FOR THE ABS SYSTEM=CAPITAL FORD PERFORMED IT IN MAY 2007=LAST FRIDAY (SEPT 26 TH) THE VEH CAUGHT FIRE=RIGHT BEFORE THE FIRE THE ABS LIGHT JUMPED ON AND THE BRAKE LIGHT CAME ON ON THE INSTRUMENT PANEL=THE FIRE STARTED UNDER THE HOOD OF THE VEH=CURRENTLY THE VEH IS AT CLASSIC FORD=NO FIRE REPORT FILED=STOPPED AT A CONVEINENCE STORE AND THEY HAD AN EXTUINGUISHER TO =NO OTHER STRUCTURAL=NO INJURIES TO CUST=FILE WITH INSURANCE=INSURANCE COMPANY CAME OUT AND APPRAISED THE VEH=THEY SAID THAT THE DAMAGE APPEARED TO COME FROM THE ABS AREA=CUST STATES THAT THE INSURANCE QUOTED THE REPAIR AS LESS THAN THE PRICE OF THE DEDUCTIBLE=CUST NOW STATES THAT SHE IS OUT OF A VEHICLE=CUST STATES THAT FORD SHOULD BE RESPONSIBLE TO COVER THE COST OF THE REPAIR AND THAT SHE WILL NEED SOMETHING TO DRIVE=DEALER SAID: CLASSIC FORD LINCOLN MERCURY 1698 BOOKER DAIRY ROAD SMITH FIELD, NC 27577-4844 TEL: (919) 934-6500 CRC ADVISED: I WILL FORWARD THIS INFORMATION TO THE FORD OFFICE OF THE GENERAL COUNSEL. YOU WILL RECEIVE WRITTEN NOTIFICATION WITHIN 10 BUSINESS DAYS WHICH YOU WILL NEED TO RESPOND TO IN WRITING.***NOTE TO CSR: PLEASE REMEMBER TO VERIFY ALL CUSTOMER CONTACT INFORMATION BEFORE SENDING ISSUE.CRC ADVISED CUST OF ABOVE=ADVISED CUST THAT CRC COULD NOT PROVIDE HER WITH A RENTAL VEHICLE AT THIS TIME =ADVISED CUST TO REQUEST POSSIBLE REIMBURSEMENT FOR A RENTAL WHEN SHE SENDS THE INFO INTO THE OGC=NO FURTHER ASSISTANCE FROM THE CRC AT THIS TIME



BEGINNING OF CONTACT
09/26/2008

VOICE OF THE CUSTOMER TRACKING SYSTEM

11.17.32

REGION: W1 LOS ANGELES OGC ISSUE CASE NBR: 1597852688
VIN: 1FMYU03172K ZONE: A02 OPENED: 09/24/2008
ENGINE: 1 VEH TYPE: T CLOSED: 09/24/2008

LAST NAME: TITLE: FIRST NAME: STATUS: CLOSED
ADDRESS: MI:
CITY: CHULA VISTA STATE: CA ZIP:
HOME PHONE: MODEL YEAR: 2002 MODEL: ESCAPE XLT 4X2
MILEAGE: 60000
DEALER NAME: FULLER FORD SALES CODE: F71076 P & A: 05579
REASON CODE: 0792 LEGAL - ACCIDENT / FIRE
SYMPTOMS: 704300 FIRE/SMOKE SCORCHED/BURNT

ORIGIN: CACI38 - US CONCERN CASE BASE COMMUNICATION: PHONE
ACTION: 792 - CONTACT ADVANCED TO OGC - FIRE
DOCUMENT: ANALYST: YJAEZ JAEZ (YJAEZ),YASMIN

DATE: 09/24/2008 TIME: 16.36.24:
ACTION DATA/COMMENTS:

CUSTOMER SAID: -VEH CAUGHT ON FIRE ON 9/24/07-FIRE STARTED F
ROM UNDER THE HOOD-VEH IS CURRENTLY AT THE CUST'S HOUSE-THER
E WAS A POLICE REPORT FILE-REPORT NUMBER 0820207 IN THE CITY
OF CHULA VISTA THE COUNTY OF SAN DIEGO THE STATE OF CALIFOR
NIA-THE ONLY DAMAGES WERE TO THE VEH-HAS NOT FILED A CLAIM W
ITH THE INSURANCE COMPANY-THE VEH IS NOT REPAIRABLE-THE VEH
WAS PARKED WHEN IT CAUGHT ON FIRE-CUST THINKS THAT FMC SHOUL
D BE RESPONSIBLE FOR THE DAMAGES-TOOK VEH TO THE DLR TO HAVE
THE RECALL FOR THE ABS SYSTEM-CUST SEEKING FIN COMPENSATION
-IF FMC DOES NOT PROVIDE ASSIST HE WILL CONTACT A LAWYERDEAL
ER SAID: FULLER FORD560 AUTO PARK DRIVE CHULA VISTA, CA 9191
1TEL:(619) 656-2500CRC ADVISED: I WILL FORWARD THIS INFORMAT
ION TO THE FORD OFFICE OF THE GENERAL COUNSEL. YOU WILL REC
EIVE WRITTEN NOTIFICATION WITHIN 10 BUSINESS DAYS WHICH YOU
WILL NEED TO RESPOND TO IN WRITING.***NOTE TO CSR: PLEASE R
EMEMBER TO VERIFY ALL CUSTOMER CONTACT INFORMATION BEFORE SE
NDING ISSUE.-ADVISED CUST THAT HIS REQUEST HAS A PROCESS AND
THE PROCESS IS THAT IT NEEDS TO BE SENT TO OUR LEGAL DEPART
MEN AND IT TAKES 10 BUSINESS FOR THEM TO REVIEW THE CASE AND
MAIL A LETTER WITH EITHER RESOLUTION OR NEXT STEPS-CRC CANN
OT TELL CUST WHAT TO DO, THAT IT IS A PERSONAL DECISION THA
T HE NEEDS TO MAKE

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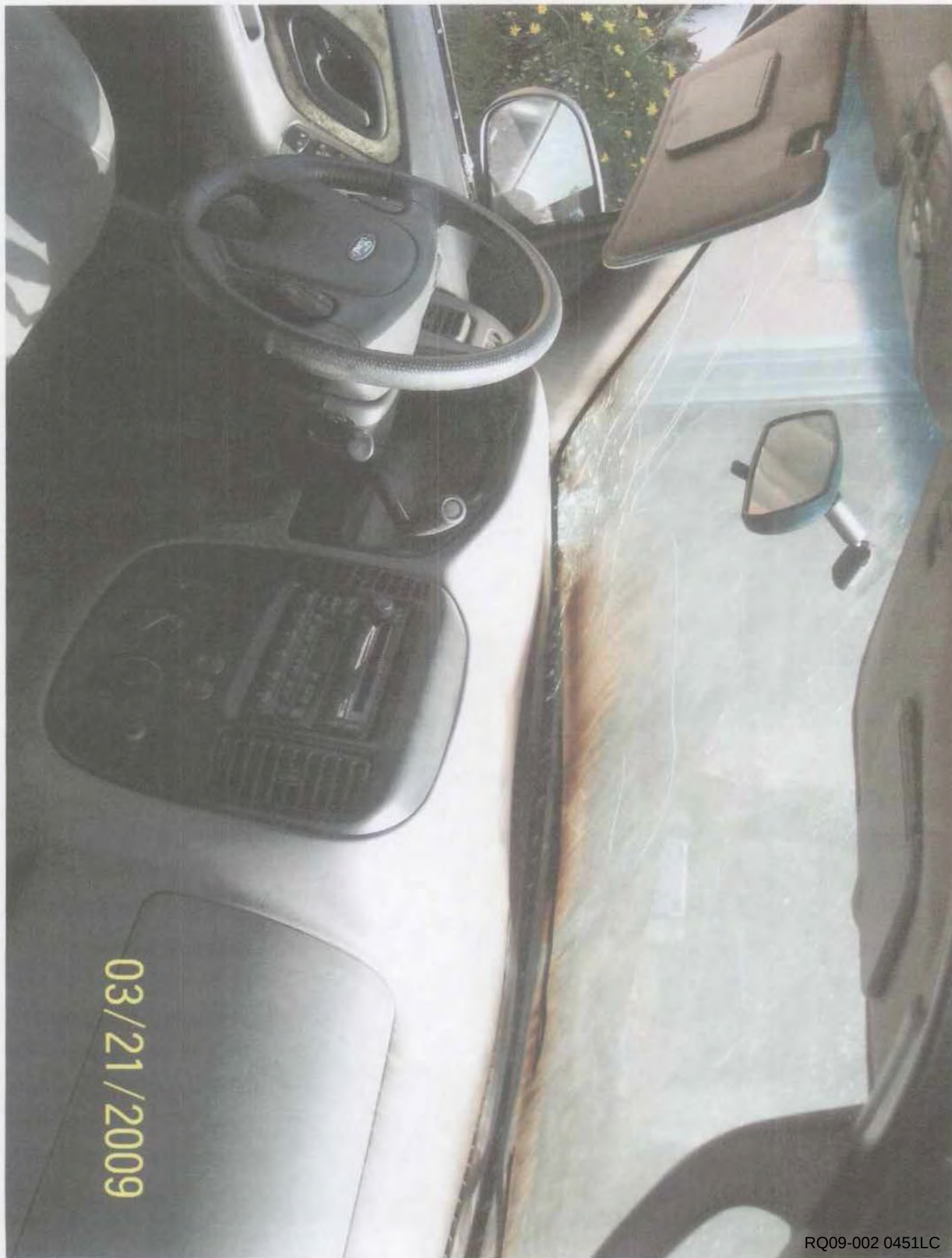
SEP 29 2008

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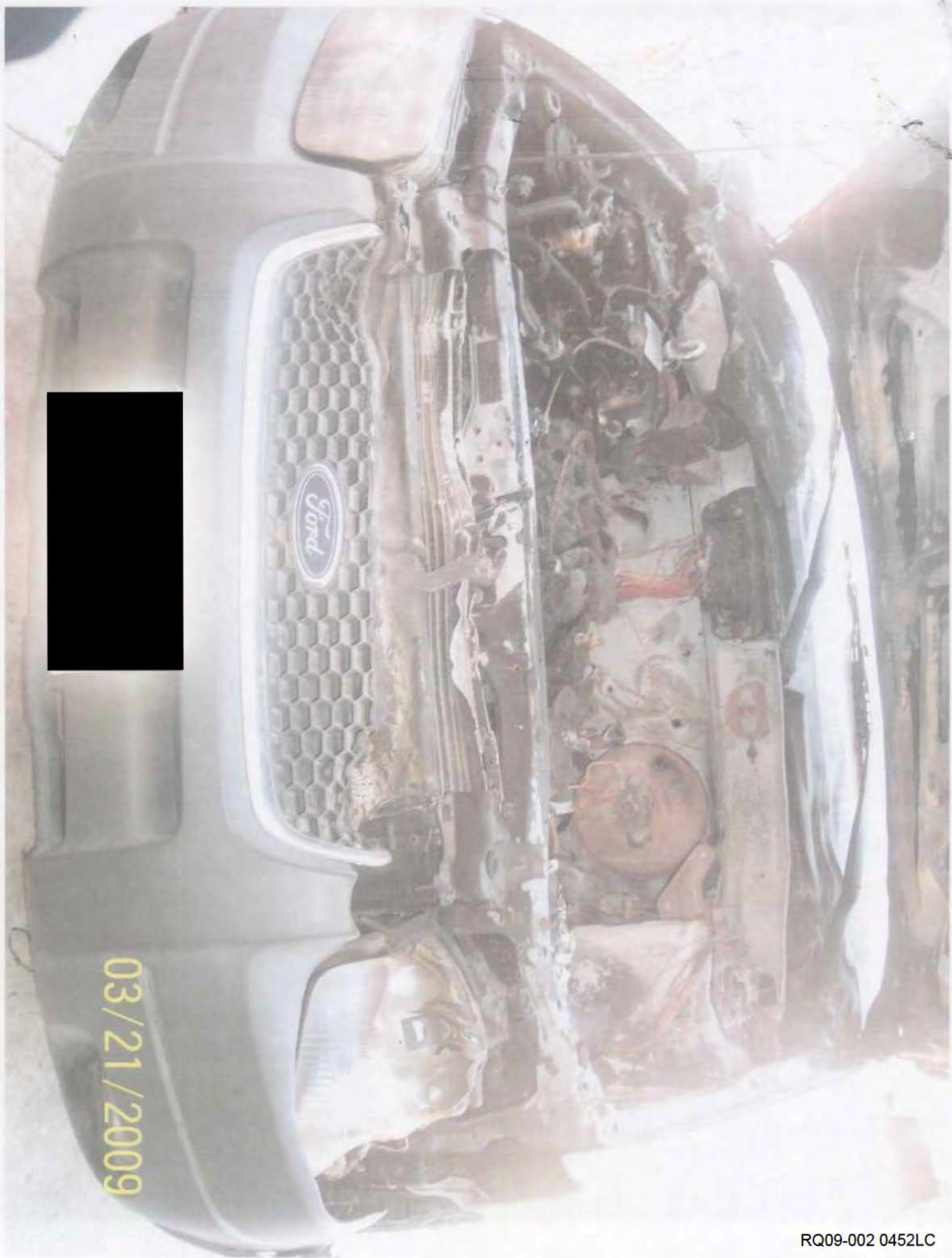


09/24/2008

RQ09-002 0450LC



03/21/2009



RQ09-002 0452LC



03/21/2009



03/21/2009

RQ09-002 0455LC



RQ09-002 0456LC



BEGINNING OF CONTACT
10/02/2008

VOICE OF THE CUSTOMER TRACKING SYSTEM

09.16.06

REGION: C5 TWIN CITIES OGC ISSUE
VIN: 1FMYU04171K [REDACTED] ZONE: A01
ENGINE: 1 VEH TYPE: T CASE NBR: 0396522758
OPENED: 10/01/2008
CLOSED: 10/01/2008

LAST NAME: [REDACTED] FIRST NAME: [REDACTED] STATUS: CLOSED
TITLE: [REDACTED] MI:
ADDRESS: [REDACTED]
CITY: SUPERIOR STATE: WI ZIP: [REDACTED]
HOME PHONE: [REDACTED]
MODEL YEAR: 2001 MODEL: ESCAPE XLT 4X4
MILEAGE: 77000
DEALER NAME: BENNA FORD SUPERIOR SALES CODE: F58401 P & A: 03965
REASON CODE: 0792 LEGAL - ACCIDENT / FIRE
SYMPTOMS: 704300 FIRE/SMOKE SCORCHED/BURNT

ORIGIN: CACI38 - US CONCERN CASE BASE COMMUNICATION: PHONE
ACTION: 792 - CONTACT ADVANCED TO OGC - FIRE
DOCUMENT: ANALYST: PBROOK39 PEGGY BROOKS (PBROOK39)

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DATE: 10/01/2008 TIME: 11.00.51:
ACTION DATA/COMMENTS:

OCT 03 2008

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GENERAL COUNSEL

CUSTOMER SAID: **CALLER WRITER" DARREN KOVAL **VEH WAS TAKEN INTO THE DLR SHP ON 6/7/2008**VARIOUS REPAIRS PERFORMED ON THE VEH**HAD THE RECALL PERFORMED **BAD ABS MODULAR ---RECEIPT STATED BAD HYDROLIC CONTROLL UNIT **DATE OF THE FIRE: 9/30/08**NO INJURIES **UNDER THE HOOD OF THE VEH **VEH IS PARKE D IN THE DRIVE WAY **NONE OF THE AUTHORIES WERE CONTACTED**N O OTHER DAMAGES TO ANYTHING ELSE--SINK SMOKE**DID NOT FILE A CLAIM WITH INSURANCE COMPANY **VEH SHOULD BE REPAIRABLE **V EH WAS NOT RUNNING WHEN THE FIRE STARTED **TIME OF FIRE 9:30 PMFIRE OCCURED AT THE ADDRESS OF REGISTERED OWNER**SEEKING F ROM FMC; SEEKING FROM FMC INFORMATION CONCERNING THE REPAIR TO THE VEH**BENNA FORD***WORK FOR THE RECALL WAS PERFORMED B Y MARK SANDERS#227DEALER SAID: BENNA FORD SUPERIOR LLC3022 T OWER AVENUE SUPERIOR, WI 54880TEL:(866) 992-3662CRC ADVISED: I WILL FORWARD THIS INFORMATION TO THE FORD OFFICE OF THE G ENERAL COUNSEL. YOU WILL RECEIVE WRITTEN NOTIFICATION WITHI N 10 BUSINESS DAYS WHICH YOU WILL NEED TO RESPOND TO IN WRIT ING.**NOTE TO CSR: PLEASE REMEMBER TO VERIFY ALL CUSTOMER CONTACT INFORMATION BEFORE SENDING ISSUE.



All Action Details for Issue

Print

VIN: 1FMYU04192K [REDACTED] Year: 2002 Model: ESCAPE Case: 1392353517
 Name: [REDACTED] Owner Status: Subsequent WSD: 2001-09-26
 Symptom Desc: FIRE/SMOKE SMOKE Primary Phone: [REDACTED]
 Reason Desc: LEGAL - ACCIDENT / FIRE Secondary Phone: [REDACTED]
 Issue Type: 10 OGC Issue Status: CLOSED

Action: CONTACT ADVANCED TO OGC - FIRE

Dealer: 02743 BILL MACDONALD FORD, INC.

Origin Desc: US CONCERN CASE BASE

Odometer: 150000 MI

Comm Type: PHONE

Analyst Name: PATRICIA GREEN (PGREEN76)

Analyst: PGREEN76

Action Date: 12/31/2008

Action Time: 11.22.18.527 Action Data: No

Comments CUSTOMER SAID: 12/17/2007 - FIRE IN VEH AND CUST TOOK VEH TO DLR IN MICHIGAN DUE TO THE FACT THAT THERE WAS A FIRE BECAUSE OF RECALL. -FORD REPLACED WHAT WAS WRONG EXCEPT FOR WIRING HARNESS. -LAST NIGHT IT STARTED SMOKING AGAIN WHILE RUNNING. 1/22/08 - RECORD SHOWS RECALL REPAIR WAS PERFORMED. -CUST SAYS ANOTHER FIRE BROKE OUT. DATE THE VEHICLE CAUGHT ON FIRE- 12/30/08 WHERE THE FIRE ORIGINATED IN THE VEHICLE-UNDERNEATH HOOD WIRING TO ABS MODULE. CURRENT LOCATION OF THE VEHICLE-W/CUST IN DRIVEWAY. WHETHER OR NOT THERE WAS A FIRE REPORT FILED WITH THE FIRE DEPARTMENT-NO. IF A FIRE REPORT WAS FILED, WHAT THE FINDINGS WERE-NO. THE FIRE REPORT NUMBER AND THE CITY OR COUNTY IN WHICH THE REPORT WAS FILED-UNKNOWN. IF THERE WERE DAMAGES TO ANYTHING OTHER THAN THE VEHICLE-NO. WHETHER OR NOT THE CUSTOMER HAS FILED A CLAIM WITH THEIR INSURANCE COMPANY-NO. IF A CLAIM HAS BEEN FILED WITH THE INSURANCE COMPANY, WHAT IS THE STATUS OF THE CLAIM-N/A. WHETHER OR NOT THE VEHICLE IS REPAIRABLE. NAME AND ADDRESS OF CUSTOMER'S ATTORNEY (ONLY IF THE CUSTOMER MENTIONS THEY HAVE SOUGHT ONE). WHETHER OR NOT THE VEHICLE WAS RUNNING WHEN THE FIRE STARTED-YES. WHAT THE CUSTOMER IS SEEKING-NOTIFY FORD OF 2ND FIRE IN THIS VEH. -CUST SAYS 1ST TIME AROUND EVERYTHING WAS REPLACED EXCEPT FOR USED WIRING HARNESS. DEALER SAID: BILL MACDONALD FORD INC 1200 CARNEY DRIVE ST CLAIR, MI 48079 TEL: (810) 329-6601 FAX: (810) 329-2086 CRC ADVISED: I WILL FORWARD YOUR INFORMATION TO FORD'S OFFICE OF THE GENERAL COUNSEL. YOU SHOULD RECEIVE A WRITTEN RESPONSE WITHIN 15 BUSINESS DAYS TO YOUR CONCERN. ***NOTE TO CSR: PLEASE REMEMBER TO VERIFY ALL CUSTOMER CONTACT INFORMATION BEFORE SENDING ISSUE.

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JAN 07 2009

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GENERAL COUNSEL



RQ09-002 0461LC

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

DATE: 09/01

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

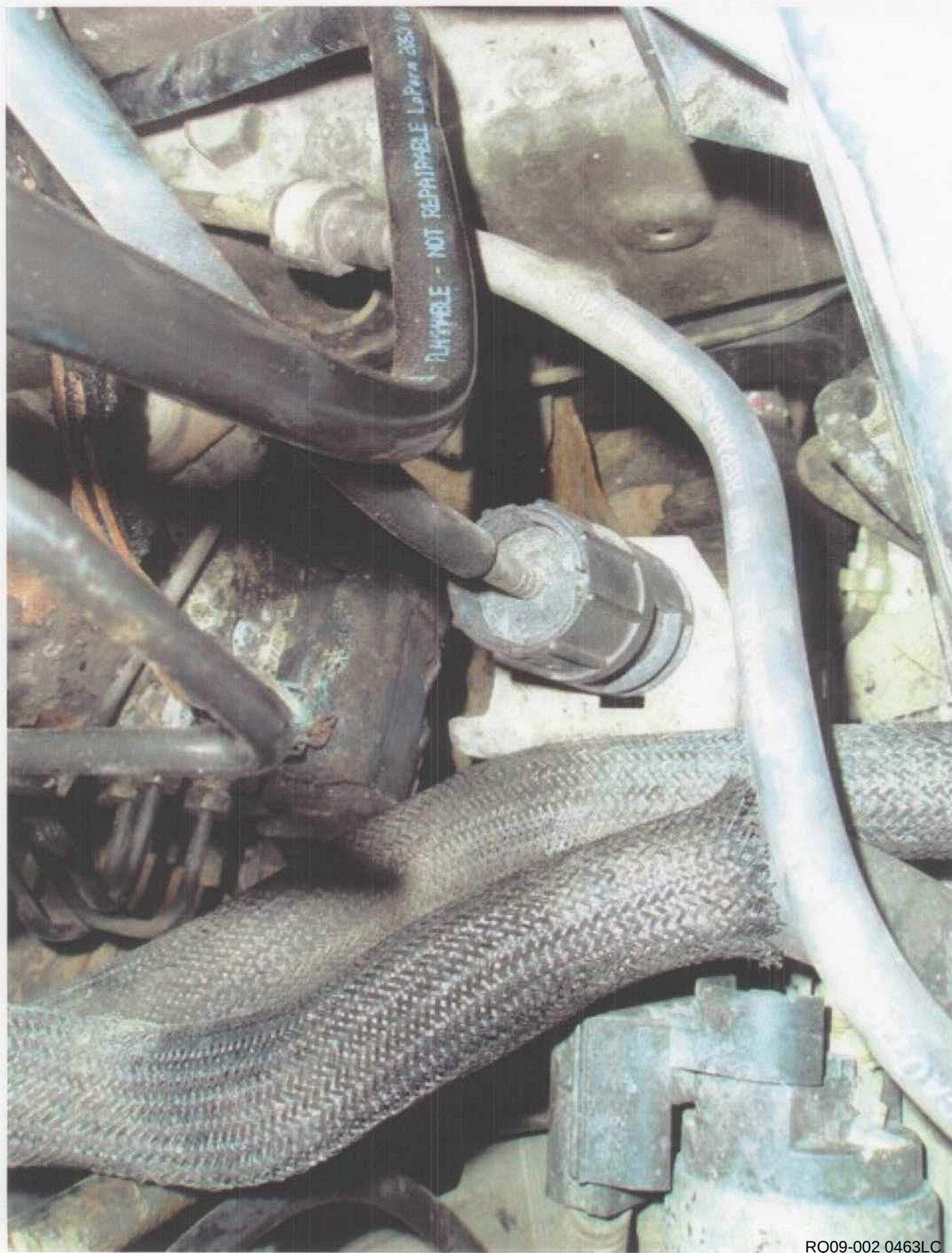
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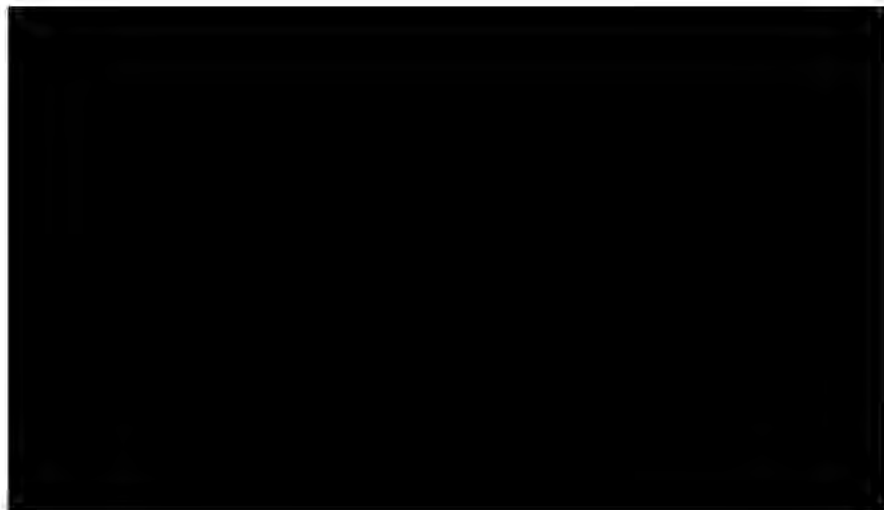
EXT PNT:	UA	TP/PS	R	AXLE	TR	DSO	SPR	OM11A
WB	BRK	INT TR	8	69	4	GC	305	
103	4	N2						

1200109073711 UTC 2USA1520472-AA





RQ09-002 0464LC



BEGINNING OF CONTACT
05/21/2008

VOICE OF THE CUSTOMER TRACKING SYSTEM

08.00.03

REGION: C5 TWIN CITIES OGC ISSUE CASE NBR: 1505151418
VIN: 1FMYU04131H ZONE: A04 OPENED: 05/20/2008
ENGINE: 1 VEH TYPE: T CLOSED: 05/20/2008

LAST NAME: FIRST NAME: STATUS: CLOSED
TITLE: MI: A
ADDRESS: CITY: BIG LAKE STATE: MN ZIP:
HOME PHONE: MODEL YEAR: 2001 MODEL: ESCAPE XLT 4X4
MILEAGE: 123000
DEALER NAME: ELK RIVER FORD-MERC SALES CODE: F58590 P & A: 09400
REASON CODE: 0792 LEGAL - ACCIDENT / FIRE
SYMPTOMS: 801000 GENERAL INQUIRIES REQUEST/NON-VEHICLE RELATED

ORIGIN: CACI38 - US CONCERN CASE BASE COMMUNICATION: PHONE
ACTION: 792 - CONTACT ADVANCED TO OGC - FIRE
DOCUMENT: ANALYST: DGLEASO3 DAWN GLEASON (DGLEASO3)

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MAY 21 2008

OFFICE OF THE
GENERAL COUNSEL

DATE: 05/20/2008 TIME: 16.24.40:
ACTION DATA/COMMENTS:

CUSTOMER SAID: 1. CAR ALARM WENT OFF AND ALL THE LIGHTS WERE FLASHING 2. VEH CAUGHT FIRE LAST FRIDAY MORNING AROUND 11:00 AM (05/16/2008)-VEH WAS PARKED IN THE WALMART PARKING LOT AND WAS NOT RUNNING WHEN FIRE STARTED-CUST SAW SMOKE COMING FROM OUT OF THE HOOD AND RAN TO GET HER FATHER-FIRE STARTED IN THE ENGINE COMPARTMENT 3. CUST FATHER AND THE STORE MANAGER OUT TO THE VEH AND LIFTED THE HOOD AND THEY SAW VISIBLE FLAMES -FIRE DEPARTMENT CAME OUT TO EXTINGUISH THE FIRE AND FORGOT THE UNPLUG THE BATTERY AND THE VEH CAUGHT FIRE AGAIN-FIRE REPORT WAS FILED IN SHERBURNE COUNTY, ELK RIVER FIRE DEPARTMENT-CUST DOESN'T HAVE FIRE REPORT NUMBER-CUST CALLED INSURANCE COMPANY TO REPORT THE FIRE FRIDAY (05/16/2008)-VEH IS CURRENTLY LOCATED AT INDEPENDENT MECHANIC RUSS BRING'S GARAGE AWAITING REPAIRS-INSURANCE ADJUSTER CAME OUT AND INSPECTED THE VEH AND DETERMINED THAT THE FIRE WAS CAUSED BY THE ABS MODULE-INSURANCE COMPANY WON'T PAY FOR ABS MODULE BECAUSE THEY FEEL IT SHOULD HAVE BEEN REPLACED UNDER RECALL AND ADVISED CUST TO CONTACT FMC TO REPORT CONCERNS-VEH IS REPAIRABLE AND INSURANCE CLAIM HAS BEEN PAID FOR ALL BUT THE ABS MODULE-CUST HAD RECEIVED A RECALL LETTER LAST YEAR (07S51) AND TOOK VEH INTO DLR FOR REPAIR (MAY 2007)-DLR INSPECTED VEH AND APPLIED GREASE TO ABS MODULE AND SENT CUST ON HER WAY-CUST FEELS DLR SHP SHOULD HAVE REPLACED ABS MODULE-CUST SEEKING FMC TO PAY FOR ABS MODULE REPAIR PARTS AND LABOR-DEALER SAID: ELK RIVER FORD - MERCURY INC. 17219 HIGHWAY 10 NW ELK RIVER, MN 55330 TEL: (763) 441-2300 CRC ADVISED: I WILL FORWARD THIS INFORMATION TO THE FORD OFFICE OF THE GENERAL COUNSEL. YOU WILL RECEIVE WRITTEN NOTIFICATION WITHIN 10 BUSINESS DAYS WHICH YOU WILL NEED TO RESPOND TO IN WRITING. ***NOTE TO CSR: PLEASE REMEMBER TO VERIFY ALL CUSTOMER CONTACT INFORMATION BEFORE SENDING ISSUE. VERIFIED ALL INFORMATION WITH CUST-RAN LEGAL PATH TL CHARMAINE ADVISED CRC AGENT TO RUN THE LEGAL PATH EVEN THOUGH INSURANCE IS INVOLVED AND IS PAYING FOR EVERYTHING EXCEPT THE ABS SENSOR

MC	NAMES	Involvement: Owner	Name: [REDACTED]	DOB: [REDACTED]	
		Age: 24	Sex: F	Race:	Height:
		[REDACTED]	City: Big Lake	State: Mn	Zip: [REDACTED]
		Phone: [REDACTED]			
		Eye Color:	Hair Color:		
		ID Number(s)			
		ID Type:	ID #:	State:	Year: Class:
VEHICLES		State: MN	Plate: [REDACTED]	VIN: 1FMYU04131K [REDACTED]	
	Make: FORD	Model: ESCAPE, 4DR WAGON	Year: 01	Color:	



ELK RIVER POLICE DEPARTMENT

INCIDENT REPORT

ICR#	[REDACTED]	AGENCY ORI#	[REDACTED]	JUVENILE:
INCIDENT	Date Reported: 05-16-2008	Time: 1833		
	Title: Miscellaneous Officer	How Received: Radio		
	Short Description:			
	Vehicle fire in parking lot of WalMart; See # [REDACTED]			
	Summary:			
	Complainants vehicle started on fire while parking in the lot of Walmart. Officers responded along with fire department to assist with putting out fire. See case # [REDACTED] for additional information on original call. Shortly after offices left the scene vehicle started back on fire and officers were called back. Squads and Fire Department responded back to Walmart, but vehicle fire was out. End of report.			
Location(s)				
WalMart Address: [REDACTED]	City: Elk River	State: MN	Zip: [REDACTED]	
Custom Attributes				
2	Officer Assigned: Nierenhausen, Ron	Badge No: 606	Primary	09-002 0467 LC

ELK RIVER FIRE DEPARTMENT INCIDENT REPORT

FDID Incident number [REDACTED] Date 5-16 City Elk River 1220
m time 11:48 Arrival time 1155 Response time 7 In time 1220
Weather conditions _____ Temperature _____ Wind direction _____ Wind velocity _____
Report date 5-16-08 Fire department charges \$ _____ Total incident time 1.0

Type of situation Car Fire
Address of incident [REDACTED]
Zip Code [REDACTED] Occupancy Type Parking Lot Apt. No. of Units _____ Miles to Fire Scene 1.2
Occupant's name [REDACTED] Phone _____
Occupant's address, room or apt. number _____
Owner's name Same Phone _____
Owner's address _____ Zip Code _____
Construction type _____ How many stories _____
Was there a keybox available Y/N _____ Sprinkler system Y/N _____ Did sprinkler system perform Y/N _____
Smoke detector present Y/N _____ Battery or electric (circle one) Did detector perform Y/N _____
Firefighters at scene 5 Firefighters roll call 15
Firefighter injuries at scene _____ Other injuries _____ First aid given at scene _____ Transported to hospital _____
Est. contents loss _____ Insurance Y/N _____ Est. property loss _____ Insurance Y/N _____
C's brush total area _____ Property damage Y/N _____
Vehicle fire _____ Year _____ Make _____ Model _____ License # [REDACTED] Insurance Y/N _____
Any equipment involved _____ Make FORD Model ESCAPE Year 2001

INCIDENT REMARKS & TYPE OF SITUATION FOUND (Possible cause, type of extinguishment, area of fire)

CAR FIRE IN WALMART PARKING LOT. REKINDLE
Engine 2 crew disconnected the battery
cable. the small fire was caused by
the a short from the battery.

APPARATUS RESPONDING TO INCIDENT

Engine E-2 Aerial _____ Tanker _____ Rescue _____ Utility _____ Other _____

APPARATUS USED AT THE FIRE SCENE

Apparatus Number E-2 Pumping Time 10 Apparatus Number _____ Pumping Time _____
Apparatus Number _____ Pumping Time _____ Apparatus Number _____ Pumping Time _____
Apparatus Number _____ Pumping Time _____ Apparatus Number _____ Pumping Time _____

HOSE USED AT FIRE SCENE

Number of lines: 1 1/2" 1 1 3/4" _____ 2 1/2" _____ 5" _____ Number of feet used: 1 1/2" 1001 3/4" _____ 2 1/2" _____ 5" _____
Deck gun used _____ Master stream used _____

OTHER EQUIPMENT USED

Ladders: Size and type _____ Chain saw used _____ Number of smoke extractors used _____
SCBA's used (total) _____ Misc. equipment used _____

ELK RIVER FIRE DEPARTMENT INCIDENT REPORT

FDID Incident number Date 5-16-08 City Elk River
 m time 11:10 Arrival time 1120 Response time 10 In time 11:20/14
 Weather conditions Temperature Wind direction Wind velocity
 Report date 5-16-08 Fire department charges \$ Total incident time 1.0

Type of situation Car Fire
 Address of incident Wal-mart Parking lot
 Zip Code Occupancy Type parking LOT Apt. No. of Units Miles to Fire Scene 1.2
 Occupant's name Phone
 Occupant's address, room or apt. number UK
 Owner's name SAME Phone
 Owner's address UK Zip Code
 Construction type How many stories
 Was there a keybox available Y/N Sprinkler system Y/N Did sprinkler system perform Y/N
 Smoke detector present Y/N Battery or electric (circle one) Did detector perform Y/N
 Firefighters at scene 9 Firefighters roll call 16
 Firefighter injuries at scene Other injuries First aid given at scene Transported to hospital
 Est. contents loss Insurance Y/N Est. property loss Insurance Y/N
 Est. brush total area Property damage Y/N
 Vehicle fire X Year Make Model License Insurance Y/N
 Any equipment involved Make FORD Model ESCAPE Year 2001

INCIDENT REMARKS & TYPE OF SITUATION FOUND (Possible cause, type of extinguishment, area of fire)

Car fire in Wal-mart lot - elec. short
caused the fire in the vehicle.

APPARATUS RESPONDING TO INCIDENT

Engine 3-2 Aerial Tanker Rescue Utility Other

APPARATUS USED AT THE FIRE SCENE

Apparatus Number E-3 Pumping Time 10 Apparatus Number Pumping Time
 Apparatus Number Pumping Time Apparatus Number Pumping Time
 Apparatus Number Pumping Time Apparatus Number Pumping Time

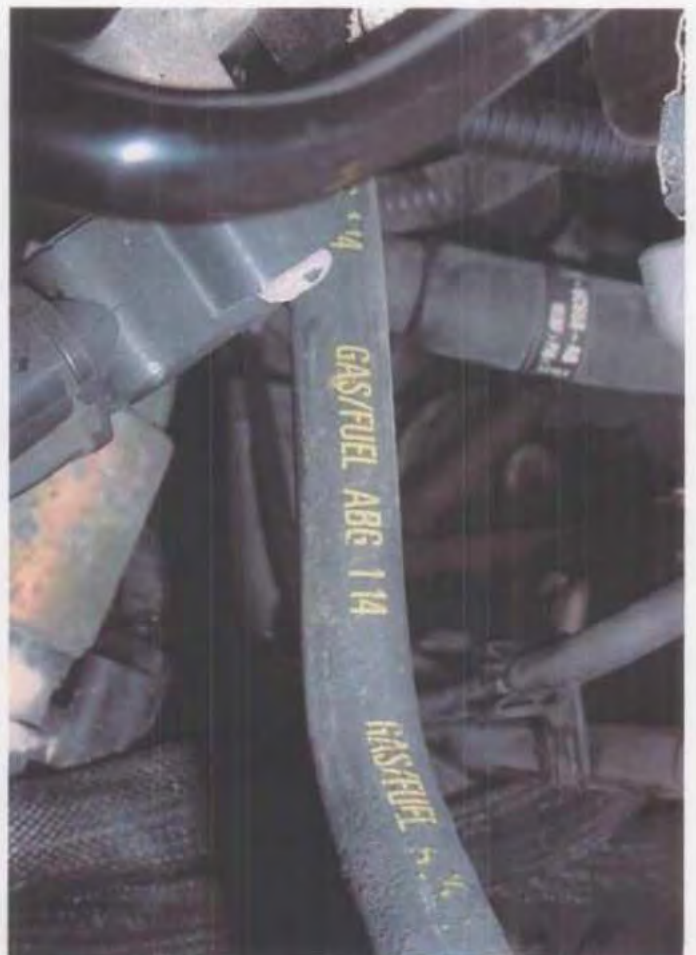
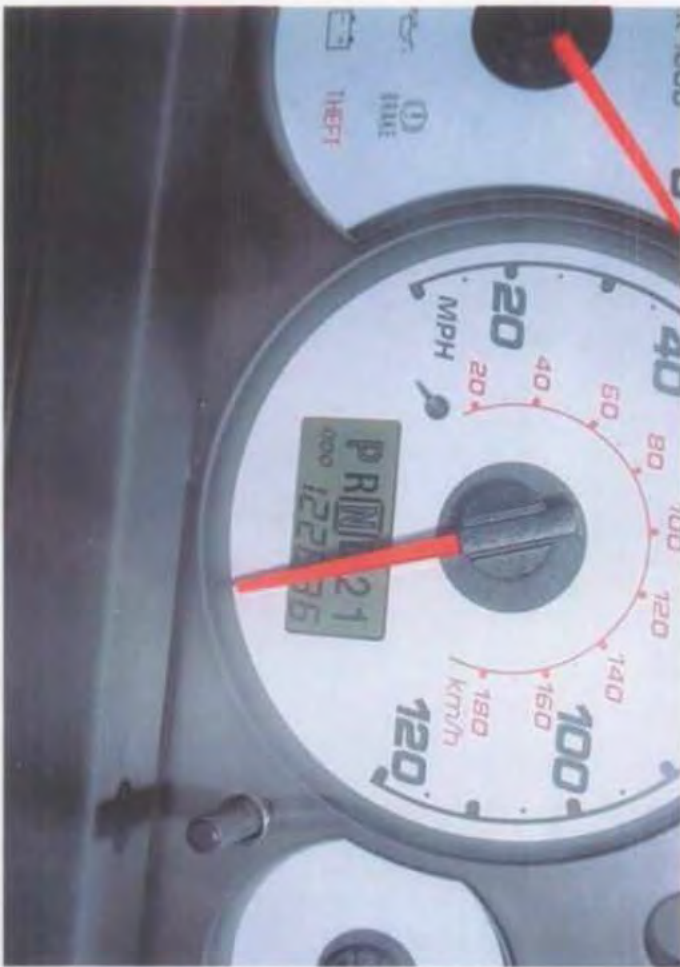
HOSE USED AT FIRE SCENE

Number of lines: 1 1/2" 1 1 3/4" 2 1/2" 5" Number of feet used: 1 1/2" 100' 1 3/4" 2 1/2" 5"
 Deck gun used Master stream used

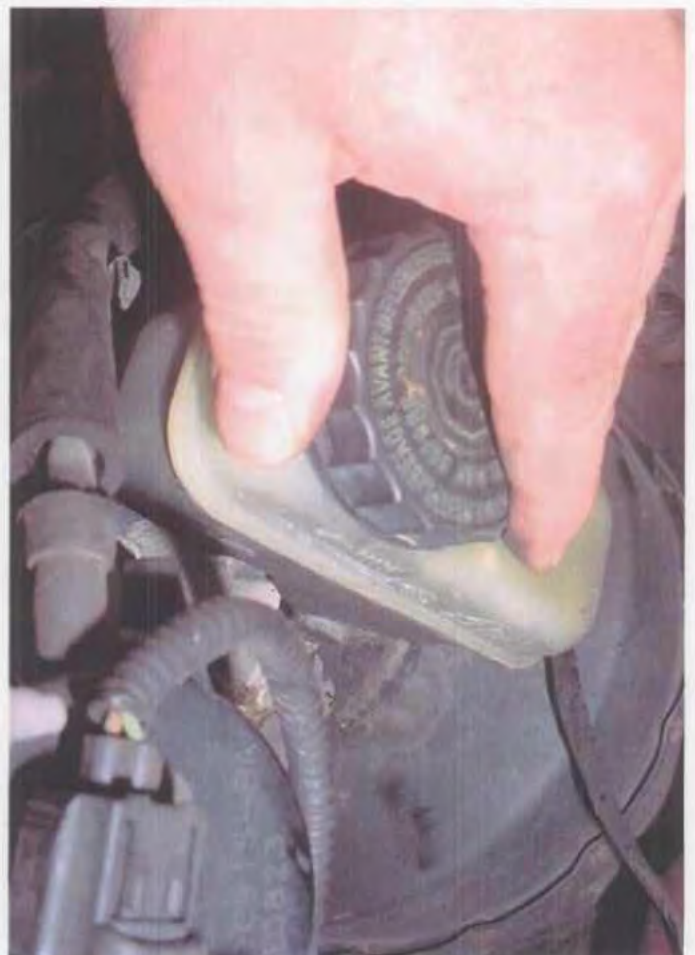
OTHER EQUIPMENT USED

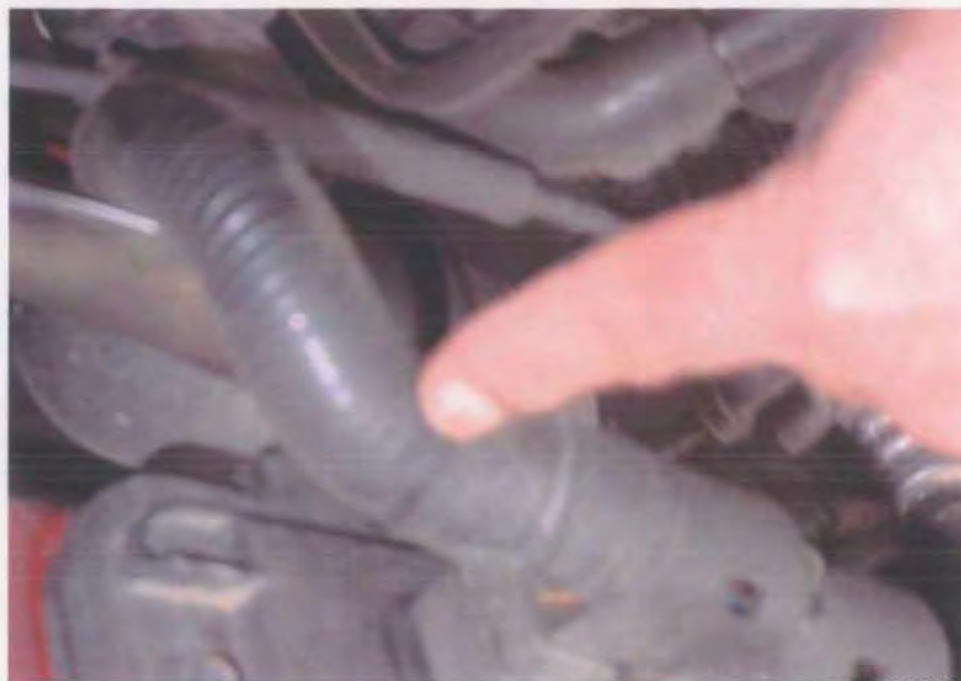
Ladders: Size and type Chain saw used Number of smoke extractors used
 SCBA's used (total) Misc. equipment used



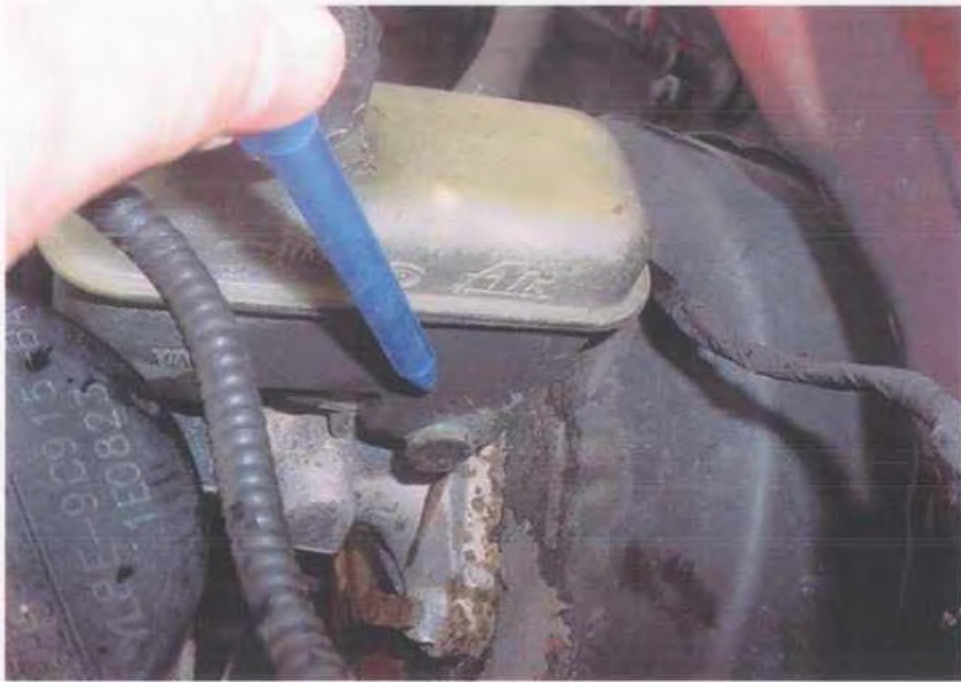














1 Dean P. Sperling
2 State Bar No. 82936
3 LAW OFFICE OF DEAN P. SPERLING
4 201 East Sandpointe, Suite 220
5 Santa Ana, California 92707-5742
6 (714) 438-8090

7/10/01 - 3 11:09:50

FILED IN COURT OF CALIFORNIA

5 Attorneys for Plaintiff, State Farm Mutual Automobile Insurance Company, an Illinois
6 corporation

7 SUPERIOR COURT OF THE STATE OF CALIFORNIA FOR THE
8 COUNTY OF SAN DIEGO, EL CAJON COURTHOUSE

9 STATE FARM MUTUAL AUTOMOBILE
10 INSURANCE COMPANY, an Illinois
11 corporation,

12 Plaintiff,

13 vs.

14 FORD MOTOR COMPANY, a Delaware
15 corporation; and DOES 1 through 200,
16 inclusive,

17 Defendants.

CASE NO. [REDACTED]

COMPLAINT FOR MONEY:

1. SUBROGATION;
2. MONEY HAD AND RECEIVED

[Limited Jurisdiction - More than \$10,000.00]

18 Plaintiff, STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY, an
19 Illinois corporation, does hereby allege as follows::

20 **GENERAL ALLEGATIONS**

21 **Parties**

22 A. Plaintiff.

23 1. Plaintiff STATE FARM MUTUAL AUTOMOBILE INSURANCE
24 COMPANY, an Illinois corporation ('Plaintiff') is, and was, an Illinois corporation,
25 authorized to transact business in the state of California. Plaintiff is, and was, authorized to
26 transact business in the state of California as an insurer.

27 B. Insured

28 2. At all relevant times herein referenced, Steve and Patricia Schuler (collectively,

1 “Insured”) are and were individuals residing in the County of San Diego, State of California.

2 C. Named Defendants

3 3. Plaintiff is informed and believes and upon such information and belief alleges
4 that at all relevant times herein referenced, Defendant, FORD MOTOR COMPANY, a
5 Delaware corporation is and was, a corporation duly organized and existing under the laws
6 of the State of Delaware, and is qualified to do business the State of California. Whenever
7 the term “Defendant Manufacturer” is utilized in this Complaint, it is to be construed as
8 referring to Defendant, FORD MOTOR COMPANY, a Delaware corporation, and Does 1
9 through 20, inclusive.

10 4. Whenever the term “Defendant Supplier” is is utilized in this Complaint, it
11 is to be construed as referring to Defendants Does 21 through 40, inclusive.

12 D. Doe Defendants.

13 5. The true names and capacities of Defendants DOES 1 through 200, inclusive,
14 whether individual, corporate, associate, or otherwise, are presently unknown to Plaintiff,
15 which therefor sues said DOE Defendants by their respective fictitious names. Plaintiff will
16 seek leave of this court to amend this complaint to reflect the true names and capacities of
17 such DOE Defendants when their respective names and capacities have been ascertained.

18 **Agency**

19 6. Plaintiff alleges, upon information of belief, that each of the Defendants named
20 in this complaint was, at all times referred to in this complaint, the agent, servant, employee,
21 representative or officer of the remaining Defendants and, in engaging in the conduct alleged
22 in this complaint, was acting within the scope, course, purpose, and authority of such agency,
23 employment and/or position, or alternatively, in the apparent scope of its authority, agency,
24 employment and/or position, and with the direction, permission, and/or consent of the
25 remaining Defendants.

26 **Joint and Several Liability**

27 7. Plaintiff alleges, upon information and belief, that each of the Defendants
28 named in this complaint was, in some manner, responsible for the acts, conduct, ~~and~~

omissions alleged in this complaint, and for the damages each of the remaining Defendants have caused, and is, therefor, jointly and severally liable for the damage that Plaintiff has sustained as alleged herein.

Venue

8. Plaintiff alleges, upon information of belief, that pursuant to Code of Civil Procedure §395(a), venue is properly laid in the County of San Diego and the within judicial district, in which the events related below took place. Further the Insured is a resident of the County of Diego.

Business of Defendant Manufacturer

9. Plaintiff is informed and believes, and upon such information and belief alleges, that Defendant Manufacturer is, and at all times mentioned was, engaged in the business of designing, manufacturing, assembling automobiles for sale to and use by members of the general public, including a 2002 Ford Escape SUV identification number 1FMCU03162K [REDACTED] referred to in this Complaint (the "Ford").

Business of Defendant Supplier

10. Plaintiff is informed and believes, and upon such information and belief alleges, that Defendant Supplier is, and at all times mentioned was, engaged in the business of designing, fabricating, manufacturing and assembling certain component parts of the Ford and, as a part of its business Defendant Supplier designed, fabricated, manufactured, assembled and supplied to Defendant Manufacturer such component parts of the Ford.

Business of Defendant Retailer

11. Plaintiff is informed and believes, and upon such information and belief alleges, that Defendant Retailer is, and at all times herein mentioned was, engaged in the business of selling to members of the general public automobiles manufactured by Defendant Manufacturer, including the Ford.

Partners of Defendant Retailer

12. Plaintiff is informed and believes, and upon such information and belief alleges, that at all times herein mentioned, Defendants Does 61 through 81 are and were

1 partners and members of Defendant Retailer and are joined as parties defendants in this
2 action on such basis.

3 **Intention of Defendant Manufacturer**

4 13. Plaintiff is informed and believes and upon such information and belief alleges
5 that Defendant Manufacturer intended that its automobiles, including the Ford, were to be
6 used for the purpose of transportation of the general public in their daily lives.

7 **Knowledge of Defendant Supplier**

8 14. Plaintiff is informed and believes and upon such information and belief alleges
9 that Defendant Supplier knew and intended that parts designed, fabricated, manufactured and
10 supplied by Defendant Supplier to Defendant Manufacturer would be installed and
11 incorporated by Defendant Manufacturer into its automobiles including the Ford.

12 **Lack of Inspection by Purchasers**

13 15. Plaintiff is informed and believes, and upon such information and belief alleges
14 that Defendants, and each of them, knew and/or intended that the its automobiles, including
15 the Ford, would be purchased from Defendant Retailer and used by the purchaser and/or user
16 without inspection for defects therein or in any of its component parts.

17 **Purchase of the Ford by the Insured**

18 16. On or about _____, the Insured purchased the Ford from the Defendant
19 Retailer for personal use. Plaintiff is informed and believes, and upon such information and
20 belief alleges that the Ford contained parts which had been designed, fabricated,
21 manufactured and assembled by Defendant Supplier and supplied to Defendant
22 Manufacturer.

23 **The Defect in the Ford**

24 17. Plaintiff is informed and believes and upon such information and belief alleges
25 that, at the time the Insured purchased the Ford, the Ford contained a defective ABS module
26 which said module was defective and unsafe for its intended purpose in that there was a
27 tendency for the said module to cause fires in the vehicles in which they were installed.
28 Plaintiff is informed and believes and upon such information and belief alleges that the

1 Defendant Manufacturer had recalled vehicles manufactured by it which contained the
2 defective ABS module on the basis that such defective modules were the cause of fires in the
3 vehicles in which they were installed.

4 **The Failure of the Ford**

5 18. On or about April 14, 2008, the Insured drove the Ford to the Insured's place
6 of employment and parked it with the engine off. Approximately 6 hours after parking the
7 Ford, while it was unoccupied and the engine turned off, a fire ignited in the engine
8 compartment of the Ford which said fire originated in the area where the ABS module was
9 located.

10 **FIRST CAUSE OF ACTION**

11 **(For Subrogation Against All Defendants)**

12 **Reincorporation by Reference**

13 19. Plaintiff realleges and incorporates by reference paragraphs 1 through 18 of
14 this Complaint as if set forth in full herein.

15 20. At all relevant times herein referenced, Insured is, and was insured against loss
16 and/or damages by Plaintiff under a policy of insurance ("Insurance"), issued by Plaintiff to
17 Insured as the named insured with respect to the Ford.

18 21. As a direct and proximate result of the defect in the Ford, as above alleged,
19 the Ford owned by the Insured was damaged and, further, damage to the other vehicles in the
20 driveway of the residence took place.

21 22. As a proximate result of the negligence of Defendants, and each of them,
22 Insured made a demand upon Plaintiff for payment pursuant to their policy of insurance.

23 23. In accordance with the terms of the policy, Plaintiff paid on behalf of the
24 Insured the sum of \$11,709.08 (including a \$100.00 deductible) in full satisfaction of the
25 Insured's claims. As a result of such payment, Plaintiff became subrogated to the claims of
26 the Insured against Defendants, and each of them.

27 24. Despite demand from Plaintiff, Defendants, and each of them, failed and
28 refused and continued to fail and refuse to pay this sum, in whole or in part thereof.

Reincorporation by Reference

RQ09-002 0484LC

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN DIEGO	
STREET ADDRESS:	250 E Main Street
MAILING ADDRESS:	250 E Main Street
CITY AND ZIP CODE:	El Cajon, CA 92020-3941
BRANCH NAME:	East County
TELEPHONE NUMBER:	
PLAINTIFF(S) / PETITIONER(S):	State Farm Mutual Automobile Insurance Company
DEFENDANT(S) / RESPONDENT(S):	Ford Motor Company
STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY VS. FORD MOTOR COMPANY	
NOTICE OF CASE ASSIGNMENT	CASE NUMBER: 

Judge:

Department:

COMPLAINT/PETITION FILED: 11/03/2008

CASES ASSIGNED TO THE PROBATE DIVISION ARE NOT REQUIRED TO COMPLY WITH THE CIVIL REQUIREMENTS LISTED BELOW

IT IS THE DUTY OF EACH PLAINTIFF (AND CROSS-COMPLAINANT) TO SERVE A COPY OF THIS NOTICE WITH THE COMPLAINT (AND CROSS-COMPLAINT).

ALL COUNSEL WILL BE EXPECTED TO BE FAMILIAR WITH SUPERIOR COURT RULES WHICH HAVE BEEN PUBLISHED AS DIVISION II, AND WILL BE STRICTLY ENFORCED.

TIME STANDARDS: The following timeframes apply to general civil cases and must be adhered to unless you have requested and been granted an extension of time. General civil consists of all cases except: Small claims appeals, petitions, and unlawful detainers.

COMPLAINTS: Complaints must be served on all named defendants, and a CERTIFICATE OF SERVICE (SDSC CIV-345) filed within 60 days of filing. This is a mandatory document and may not be substituted by the filing of any other document.

DEFENDANT'S APPEARANCE: Defendant must generally appear within 30 days of service of the complaint. (Plaintiff may stipulate to no more than a 15 day extension which must be in writing and filed with the Court.)

DEFAULT: If the defendant has not generally appeared and no extension has been granted, the plaintiff must request default within 45 days of the filing of the Certificate of Service.

THE COURT ENCOURAGES YOU TO CONSIDER UTILIZING VARIOUS ALTERNATIVES TO LITIGATION, INCLUDING MEDIATION AND ARBITRATION, PRIOR TO THE CASE MANAGEMENT CONFERENCE. MEDIATION SERVICES ARE AVAILABLE UNDER THE DISPUTE RESOLUTION PROGRAMS ACT AND OTHER PROVIDERS. SEE ADR INFORMATION PACKET AND STIPULATION.

YOU MAY ALSO BE ORDERED TO PARTICIPATE IN ARBITRATION PURSUANT TO CCP 1141.10 AT THE CASE MANAGEMENT CONFERENCE. THE FEE FOR THESE SERVICES WILL BE PAID BY THE COURT IF ALL PARTIES HAVE APPEARED IN THE CASE AND THE COURT ORDERS THE CASE TO ARBITRATION PURSUANT TO CCP 1141.10. THE CASE MANAGEMENT CONFERENCE WILL BE CANCELLED IF YOU FILE FORM SDSC CIV-359 PRIOR TO THAT HEARING

All Action Details for Issue

Print

VIN: 1FMCU03162K [REDACTED]	Year: 2002	Model: ESCAPE	Case: 1644431098
Name: MS [REDACTED]	Owner Status: Original	WSD: 2002-08-01	
Symptom Desc: FIRE/SMOKE VISIBLE FLAME		Primary Phone: [REDACTED]	
Reason Desc: LEGAL - INSURANCE COMPANY SETTLEMENT		Secondary Phone: [REDACTED]	
Issue Type: 01 INQUIRY	Issue Status: CLOSED		

Action: ADVISE CUSTOMER TO CONTACT THEIR INSURANCE COMPANY FOR ASSISTANCE

Dealer:

Origin Desc: US CONCERN CASE
BASE

Odometer: 75000 MI

Comm Type: INBOUND CUSTOMER
EMAILAnalyst Name: MADTAHIR
CHRISTIE

Analyst: CMADTAHI

Action Date: 04/18/2008

Action Time: 18.02.48.495

Action Data: No

Comments CUSTOMER SAID: THREAD ID:1-40PF72-VEH IS 2002 FORD ESCAPE WITH 75000 MILES-THE VEH CAUGHT ON FIRE-CUST THINKS FORD SHOULD BE RESPONSIBLE TO GET HER BACK IN A VEH WITHOUT PAYMENT-VEH HAD 2 RECALLS THAT WAS ALREADY REPAIRED-HE HAD THE VEH SERVICED AT A FORD DLR REGULARLY-CUST KNOWS THAT THE VEH IS OUT OF WARRANTY, BUT THERE SHOULD HAVE BEEN A RECALL ISSUED-CUST IS ASKING WHY DIDN'T FORD RECALLED THE FORD ESCAPE ALONG WITH ALL OTHER VEHs THAT WERE CATCHING ON FIRE-THE INSURANCE HAD PROVIDED MINOR COMPENSATION-THE VEH IS TOTALED, AND BEFORE THE FLAMES STARTED SPARKS WERE ALREADY ON THE ENGINE-THIS IS AN ELECTRICAL PROBLEM-CUST IS ASKING FOR AN ADVISE OF FORD'S ACTION TO ADDRESS THIS PROBLEM DATE OF THE FIRE: APRIL 14, 2008 WHERE DID THE FIRE ORIGINATE: ENGINE WAS THE VEHICLE RUNNING WHEN FIRE STARTED: NO CURRENT LOCATION OF THE VEHICLE: DREW FORD IN LA MESA, CA WERE ANY INJURIES SUSTAINED: NO IF SO, TO WHAT EXTENT: N/A WAS THERE ANY OTHER PROPERTY DAMAGE: YES IF SO, WHAT WAS DAMAGED: PARKING GARAGE FLOOR DAMAGED, AND BEING BILLED TO ME WAS A FIRE REPORT FILED: NO, THE FIRE DEPARTMENT SAID MY INSURANCE COMPANY WOULD DO THE INVESTIGATION IF A FIRE REPORT WAS FILED, WHAT WERE THE FINDINGS: THE FIRE REPORT NUMBER AND THE CITY OR COUNTY IN WHICH THE REPORT WAS FILED: SAN DIEGO, CA HAVE YOU FILED A CLAIM WITH YOUR INSURANCE COMPANY: YES *** CONTINUATION UNDER CRC ADVISED DEALER SAID: -NONEDREW FORD 8970 LA MESA BLVD LA MESA, CA 91941 TEL: (619) 464-7777 CRC ADVISED: YOUR INSURANCE COMPANY HAS THE RIGHT TO PURSUE CLAIMS FOR REIMBURSEMENT AGAINST FORD, HOWEVER, FORD WILL BE UNABLE TO INVESTIGATE YOUR CLAIM AS REPAIRS TO YOUR VEHICLE HAVE BEEN PERFORMED AND YOU ARE CURRENTLY IN THE PROCESS OF PURSUING A CLAIM WITH YOUR INSURANCE COMPANY. ===== ADVISED CUST OF THE ABOVE PHRASEOLOGY-THREAD ID:1-40PF72-ATTACHED===== *** CONTINUATION OF CS: IF A CLAIM HAS BEEN FILED, WHAT IS THE STATUS OF THE CLAIM: PENDING INVESTIGATION IS THE VEHICLE REPAIRABLE: NO, IT'S A TOTAL LOSS NAME AND ADDRESS OF ATTORNEY IF ONE HAS BEEN CONTACTED: -CUST HAD NOT CONTACTED AN ATTORNEY YET-SHE WANTS TO GIVE FORD A CHANCE TO RECTIFY THE PROBLEM-SH HAVE FAITH THAT FORD WILL RECTIFY THIS PROBLEM WITHOUT THE NEED TO CONTACT A LAWYER

Ford Confidential

All Action Details for Issue

[Print](#)

VIN: 1FMCU03162H [REDACTED]	Year: 2002	Model: ESCAPE	Case: 1644431098
Name: M [REDACTED]	Owner Status: Original	WSD: 2002-08-01	
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:

Odometer: 75000 MI

Analyst Name: MADTAHIR CHRISTIE

Action Date: 04/18/2008

Comm Type: PHONE

Analyst: CMADTAHI

Action Time: 17.54.03.289

Origin Desc: MANUAL - PHONE CSR

Action Data: No

Comments CUSTOMER PROFILE UPDATE

Ford Confidential

State Farm Insurance Companies



May 2, 2008

Roseville Operations Center
PO Box 6403
Rohnert Park, CA 94927-9814

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Ford Motor CO
P O Box 70
Dearborn, MI 48121-0070

RE: Claim Number: [REDACTED]
Date of Loss: April 14, 2008
City & State of Loss: El Cajon, CA
Our Insured: [REDACTED]
Vehicle: 2002 Ford Escape
Vehicle Owner: [REDACTED]
VIN Number: 1FMCU03162K [REDACTED]

FORD MOTOR COMPANY
RECEIVED
CLAIMS UNIT

MAY 15 2008

OFFICE OF THE
GENERAL COUNSEL

Dear Gentlemen:

This notice is to advise of a loss that occurred to our insured vehicle. Our preliminary investigation indicates that Ford Motor Co may be responsible for this loss. Please consider this as our notice of possible subrogation.

The vehicle is being held at an offsite location in San Diego, CA. You are only authorized to inspect this vehicle in the presence of a State Farm representative. No variation of this authorization will be permitted.

Any settlement with State Farm's policyholder with respect to this loss must not prejudice our rights, as subrogator, 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.

Ford Motor CO
Page 2
May 2, 2008

Your cooperation is appreciated. In order to ensure we can identify documents to the claim file, please include the claim number on all correspondence.

If you should have any questions please feel free to contact me at the phone number listed below.

Sincerely,



Eric B. Cates x5865
Claim Representative
(949) 553-5865

State Farm Mutual Automobile Insurance Company



BEGINNING OF CONTACT
06/10/2008

VOICE OF THE CUSTOMER TRACKING SYSTEM

08.00.05

=====

REGION: N3 PHILADELPHIA	OGC ISSUE	CASE NBR: 1364471618
VIN: 1FMYU04142K	ZONE: A02	OPENED: 06/09/2008
	ENGINE: 1	CLOSED: 06/09/2008
	VEH TYPE: T	

=====

LAST NAME: [REDACTED]	FIRST NAME: [REDACTED]	STATUS: CLOSED
TITLE: [REDACTED]		MI: W
ADDRESS: [REDACTED]		
CITY: POTTSTOWN	STATE: PA	ZIP: [REDACTED]
HOME PHONE: [REDACTED]		
MODEL YEAR: 2002	MODEL: ESCAPE XLT 4X4	
MILEAGE: 63000		
DEALER NAME: JOHN KENNEDY FORD	SALES CODE: F16405	P & A: 03952
REASON CODE: 0792 LEGAL - ACCIDENT / FIRE		
SYMPTOMS: 704200 FIRE/SMOKE SMOKE		

ORIGIN: CACI38 - US CONCERN CASE BASE COMMUNICATION: PHONE
ACTION: 792 - CONTACT ADVANCED TO OGC - FIRE
DOCUMENT: ANALYST: TATKIN22 THOMAS ATKINS (TATKIN22)

FORD MOTOR COMPANY
RECEIVED
CLAIMS UNIT

DATE: 06/09/2008 TIME: 10.07.26:
ACTION DATA/COMMENTS:

JUN 10 2008

OFFICE OF THE
GENERAL COUNSEL

CUSTOMER SAID: -WHILE DRIVING DOWN THE ROAD I SMELLED SMOKE OR SOMTHING BURNING -I KNEW THERE WAS A FIRE UNDER THE HOOD ON 05/28/08 -RIGHT BEFORE I PULLED OVER THE ABS LIGHT CAME ON -THE FIRE ORIGINATED AT THE FRONT OF THE VEH UNDER THE HOOD -THE VEH IS AT THE DLRSHIP CURRENTLY -THERE WAS NO FIRE REPORT FILED BECAUSE WE MANAGED TO GET THE FIRE OUT -THERE WERE NO OTHER DAMAGES -I DID FILE A CLAIM WITH THE INSURANCE COMPANY AND THEY ARE PAYING FOR THE DAMAGES BUT SAID THAT THE WIRING HARNESS IS FORDS PROBLEM AND THEY WOULD NOT PAY FOR IT -I WAS TOLD THAT THE VEH CONCERN WAS ON RECALL BY THE INSURANCE COMPANY FOR THE WIRING HARNESS AND THE ABS SYSTEM -THE VEH IS REPAIRABLE AND I GOT A CALL ON FRIDAY AND I THINK IT IS DONE -THE VEH WAS RUNNING WHEN THE FIRE STARTED -IT WAS THE WIRING HARNESS TO THE ABS THAT CAUGHT ON FIRE AND CAUSED THE MALFUNCTION OF THE VEH -CUST IS SEEKING TO HAVE THE \$800.00 CHARGE TAKEN CARE OF THROUGH FORD BECAUSE HE IS CLAIMING THAT AFTER TAKING THE VEH TO THE DLRSHIP THE CONCERN WITH THE ABS BECAME APPARENT DEALER SAID: -S/A TIM SAID THAT THEY WERE HUNTING THE HARNESS AND THEY WERE GOING TO GET IT IN AND THEY NEEDED THE OKAY TO DO THE REPAIR -JOHN KENNEDY FORD 730 VALLEY FORGE ROAD PHOENIXVILLE, PA 19460 TEL: (800) 906-6031 CRC ADVISED: I WILL FORWARD THIS INFORMATION TO THE FORD OFFICE OF THE GENERAL COUNSEL. YOU WILL RECEIVE WRITTEN NOTIFICATION WITHIN 10 BUSINESS DAYS WHICH YOU WILL NEED TO RESPOND TO IN WRITING. **NOTE TO CSR: PLEASE REMEMBER TO VERIFY ALL CUSTOMER CONTACT INFORMATION BEFORE SENDING ISSUE.-----

-----AGENT PROVIDED CUST WITH THE ABOVE SCRIPT -CUST CONTENDS THAT HE HAD THE VEH IN FOR SERVICE FOR A POSSIBLE RECALL FIVE MONTHS AGO AND THE DLRSHIP SAID THAT THE DLRSHIP CONCLUDED THAT THE VEH WAS FINE AND IN WORKING CONDITION -CUST FEELS THAT THE WORK CONDUCTED AT THE DLRSHIP IS A RESULT OF THE VEH FIRE -AGENT ASKED CUST HAD HE RECEIVED THE RECALL NOTICE OF 05S28 FOR THE SPEED CONTROL AND TO HIS KNOWLEDGE HE DID NOT REMEMBER SUCH RECALL BUT INSISTS THAT THE INSURANCE COMPANY HAS INFORMED HIM THAT THEY WILL NOT COVER THE REPAIRS OF THE ABS WIRING HARNESS BECAUSE THE COMPONENT WAS UNDER RECALL THROUGH FORD HOWEVER AS PER OASIS NO RECALL OF THAT NATURE IS LISTED





Interinsurance Exchange of the Automobile Club
P. O. Box 25024, Santa Ana, CA 92799-5024

November 11, 2008

Mossy Ford
Attn: Scott Frazier
4570 Mission Bay Dr
San Diego, CA 92109

RE: Auto Claim
Our Insured
Our Policy Number
Date of Loss

[REDACTED]
; 09/01/2008

RECEIVED

NOV 13 2008

NOV 13 2008
OFFICE OF THE
GENERAL COUNSEL

The Interinsurance Exchange of the Automobile Club has a claim against your Insured as a result of the accident that has occurred on the above date. The claim consists of:

UMC	
AUTO / PROPERTY	\$2706.57
DEDUCTIBLE	\$ 250.00
RENTAL	\$ 530.33
RENTAL OPE	\$ 251.79
TOTAL	\$3738.69

Enclosed are the necessary documents to support our subrogation claim:
Copy of Estimate, Photos of Damages, Proof of Payment, & Enterprise Rental Invoice

Please show our Claim Number and Date of Loss on your draft made payable to Interinsurance Exchange of the Automobile Club and mail your payment to the Attention of Corporate Cashiering, Mail Stop A118, PO Box 25024, Santa Ana, CA 92799.

My contact information: Danielle Owens Ph (888) 222-9208 x 7694
owens.latoys@aaa-texas.com, Fax (972) 630-2669

Danielle Owens
Claim Rep-Subrogation
Auto Club of Southern CA
6555 North State Highway 161
Irving, TX 75039

SUBC05

STEVEN R. MACKAIG & ASSOCIATES, Inc.

Fire Investigations



362 Front Street, Suite A, El Cajon, CA 92020
Phone: (619) 579-1772 Fax: (619) 579-7137

License No. 15369 CA

License No. 01382853 AZ
mackaigmail@earthlink.com
Fire Cause Experts

VEHICLE FIRE INVESTIGATION REPORT

Auto Club of So California Insurance

Claim#: [REDACTED]

SRM Repd: [REDACTED]

Loss Vehicle Description:

2002 Ford Escape

Insured: [REDACTED]

Date of Loss: September 1, 2008



STEVEN R. MACKAIG & ASSOCIATES, Inc

Fire Investigations



362 Front Street, Suite A, El Cajon, CA 92020
Phone: (619) 579-1772 Fax: (619) 579-7137

License No. 15369 CA
License No. 01382853 AZ
mackaigmail@earthlink.com
Fire Cause Experts

October 13, 2008

Heidi Fiedler
Auto of So Cal
800 La Terraza Blvd. 2nd floor
Escondido, CA 92025

Re: AAA Claim #: [REDACTED]
SRM Report #: [REDACTED]
Type: Vehicle Fire Investigation
Description: 2002 Ford Escape
Insured: [REDACTED]
Date of Loss: September 1, 2008
Date of Assignment: October 3 2008
Inspection Date: October 3, 2008
Investigator: Steven R Mackaig

CONFIDENTIAL REPORT FIRE ORIGIN AND CAUSE INVESTIGATION

The opinions and conclusions in this report are based on the physical evidence examined at the fire scene and the evaluation of information obtained during my investigation of this fire loss. This report contains confidential information and is the work product of Steven R Mackaig & Associates, Inc. It is not for publication, distribution, reproduction, or used for any other purpose without the explicit written consent of Steven R Mackaig & Associates, Inc. The release of information contained in this report to others is the responsibility of the addressee.

FIRE ORIGIN AND CAUSE INVESTIGATION GUIDELINES

The fire cause investigation is conducted using the guidelines found in the National Fire Protection Association publication 921, Guide for Fire and Explosion Investigations.

FIRE INVESTIGATION SUMMARY REPORT

Per your instruction, I am submitting a short abbreviated summary report with limited photographs, limited interviews, and a summary account of my fire cause determination. Additional photographs, sketches, and detailed notes remain in my file should they be needed for a long form detailed report.

FIRE CAUSE DETERMINATION

On October 3, 2008, our office was requested to conduct a vehicle fire cause investigation. Arrangements were made to inspect the vehicle on October 3, 2008.

My investigation revealed that the fire originated inside the engine compartment, at the location of the ABS brake system control module. The module overheated internally during vehicle operation causing damage to the module and wiring harness connected to the module.

OPINIONS AND RECOMMENDATIONS

Burn patterns and fire behavior indicators identify the fire originating at the ABS control module. Fire damage was confined to the module and connecting circuit wiring. The module appears damaged from internal overheating and the wiring is heat damaged from exposure to the overheated module.

The vehicle was purchased new from Mossy Ford located in San Diego, CA. According to the insured, Mossy Ford replaced the transmission and rebuilt the brakes approximately two weeks and 250-300 miles before the fire. Mossy service record indicates the transmission replacement and brake repair occurred on 8-16-08 at 117,944 miles. Transmission replacement and brake rebuilding would not cause the ABS brake module to fail and I did not find any physical evidence that these repairs caused this fire.

However, the insured stated that approximately one year ago he received a recall notice from Ford related to defective ABS brake control module wiring. (See attached recall document 07V156000) The recall document indicates that the ABS brake warning light will activate followed by overheating of the ABS brake module with the potential to cause a fire. The insured was driving the vehicle when the ABS brake warning light suddenly activated followed by smoke in the rear view mirror. He stopped and opened the hood and observed fire activity in the area of the ABS control module. The insured described a fire onset event that matches the information in the ABS control module failure recall.

According to Mossy Ford service record, the loss vehicle was examined on 12-31-07 for the ABS module wiring recall. Their records indicate that the technician checked the

ABS wiring and connection to the ABS module and found no corrosion or problem. Electrical grease was applied to the inspected connection.

In my opinion, this fire is the result of a failure of the ABS control module, possibly at the wiring harness connection that was examined by Mossy Ford approximately one year ago and determined as corrosion and problem free. I recommend that the ABS module and connecting wiring currently located in the loss vehicle be retained after replacement if subrogation is considered. These items can be forensically examined in a laboratory for evidence of corrosion and mechanism of failure if necessary.

Research into the loss vehicle for recalls reveals no outstanding recalls indicating the ASB control module has been serviced as Mossy Ford records indicate.

VEHICLE DESCRIPTION

Year: 2002
Make: Ford
Model: Escape
Color: White
Mileage: 118,293
License #: [REDACTED]
V.I.N: 1FMCU03172K [REDACTED]

If applicable, physical evidence obtained during this investigation is stored three years and discarded unless otherwise instructed. Storage fee is indicated on your invoice.

Storage fee for your evidence is \$none per month billed annually. The first year storage is billed in advance. Evidence disposal fee as applicable.

Please notify us in writing if you do not want us to retain this physical evidence. Upon receipt of the letter to discard or return the evidence to you, Steven R Mackaig & Associates Inc. is hereby relieved from any/all liability and/or responsibility. All parties in connection herewith acknowledge the discarding of this evidence may have an impact on future litigation.

Respectfully submitted,

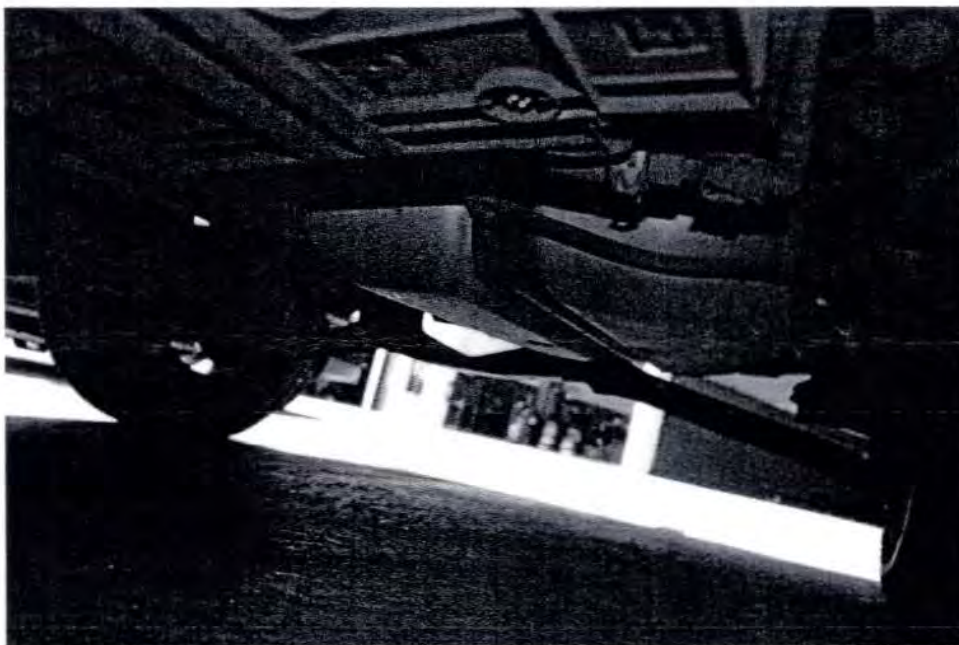
Steven R. Mackaig, CFI
Steven R. Mackaig & Associates, Inc.

SRM: loc

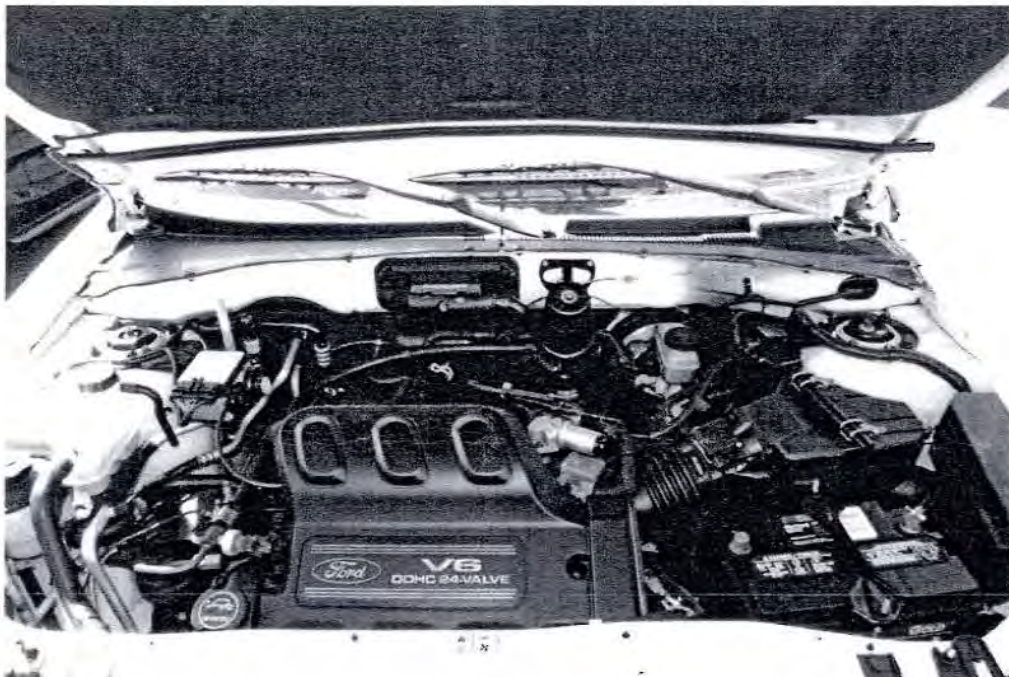
Photographic Log



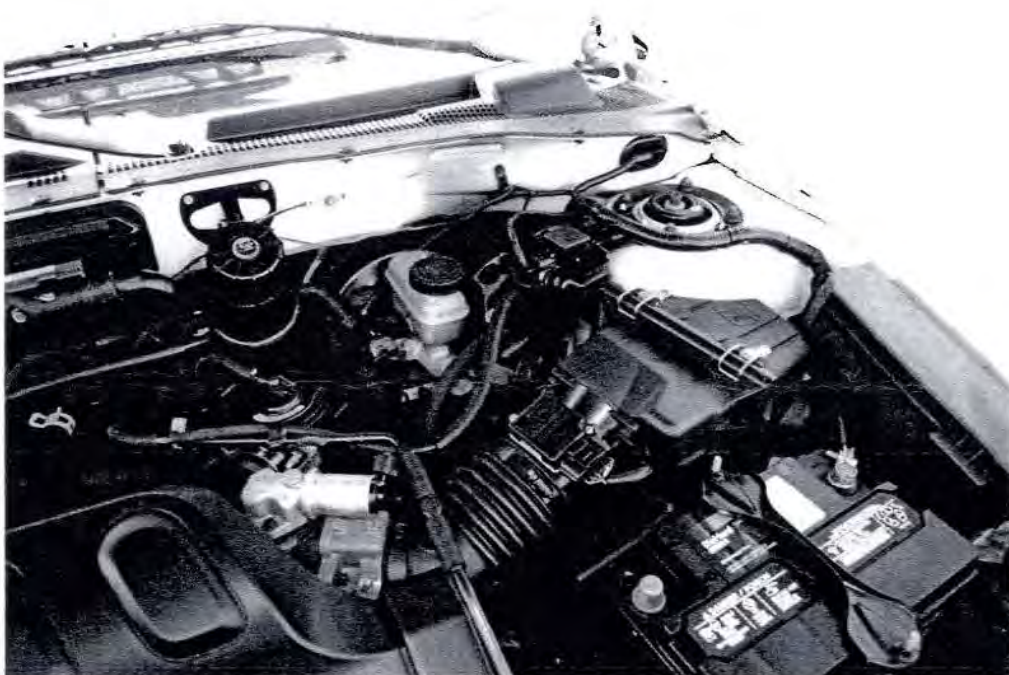
1. Loss vehicle. No exterior fire damage.



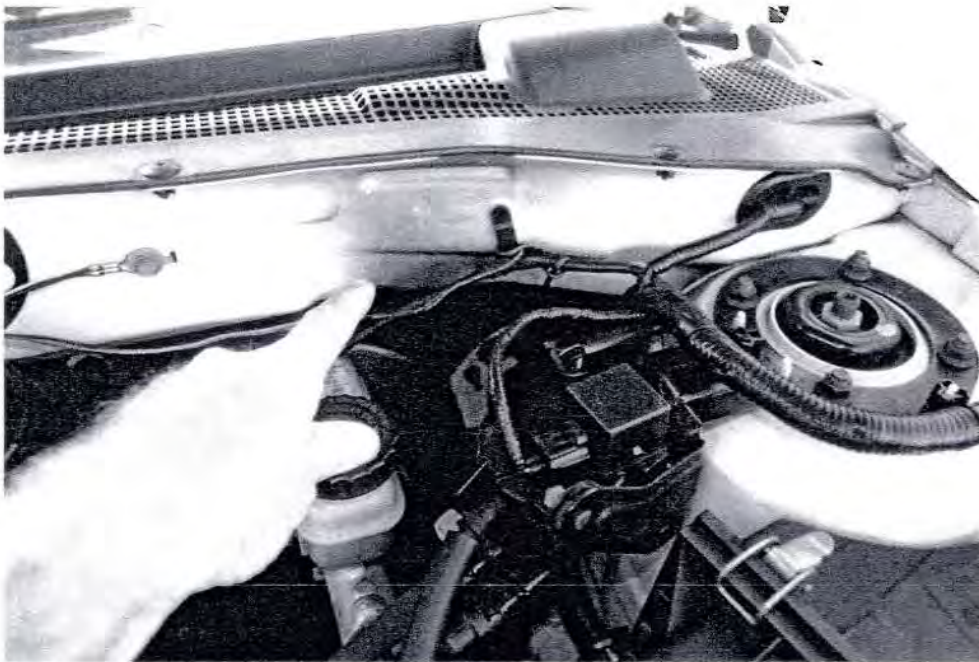
2. Inspection of the chassis and driveline reveals no fire damage and no fluid leakage.



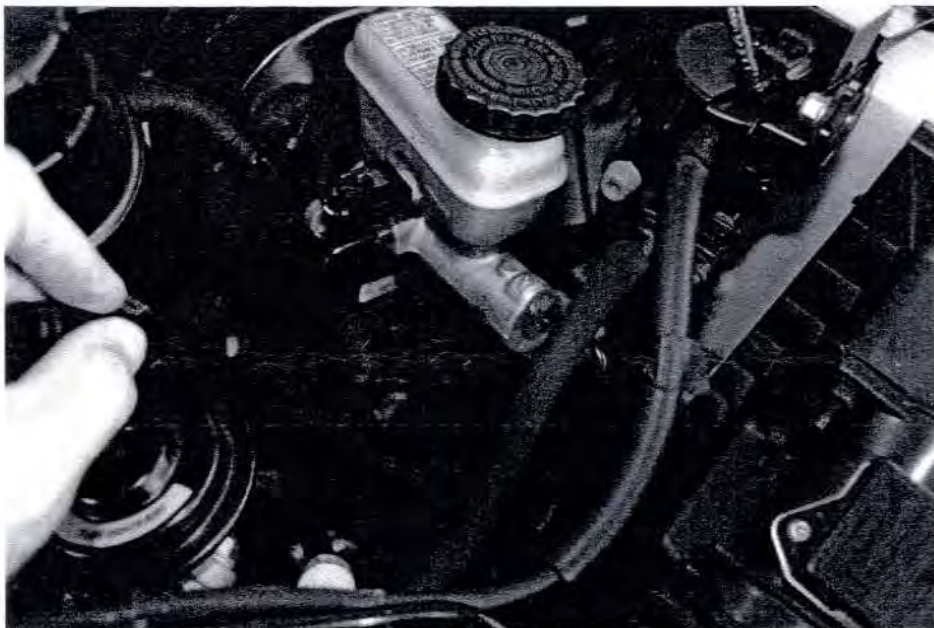
3. Inspection of the engine compartment.



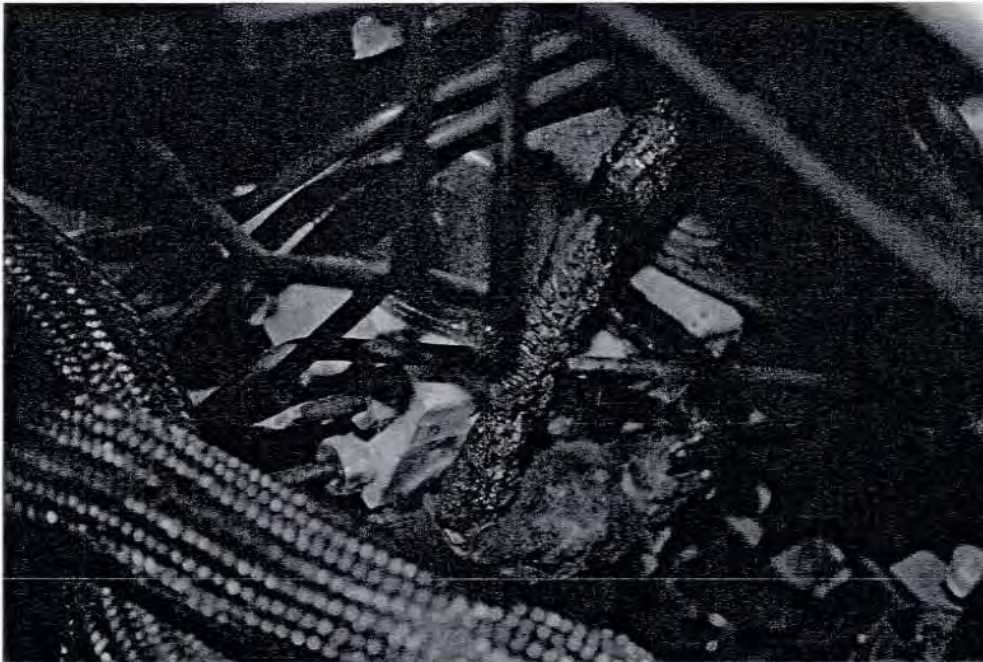
4. Fire originated at the ABS brake module located below the brake master cylinder.



5. Smoke staining on the firewall surface originates from the ABS brake control module and wiring located below.



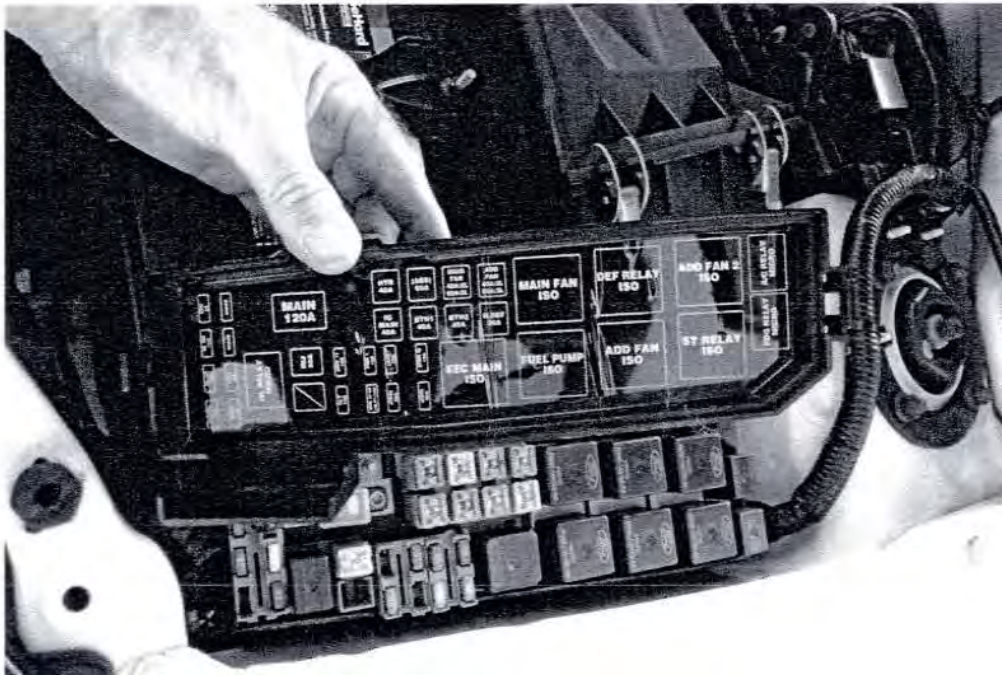
6. Fire damage is confined to the ABS brake module and wiring located below the brake master cylinder.



7. Internally heat damaged brake control module and burned attached wiring. Fire originated at the brake control module.



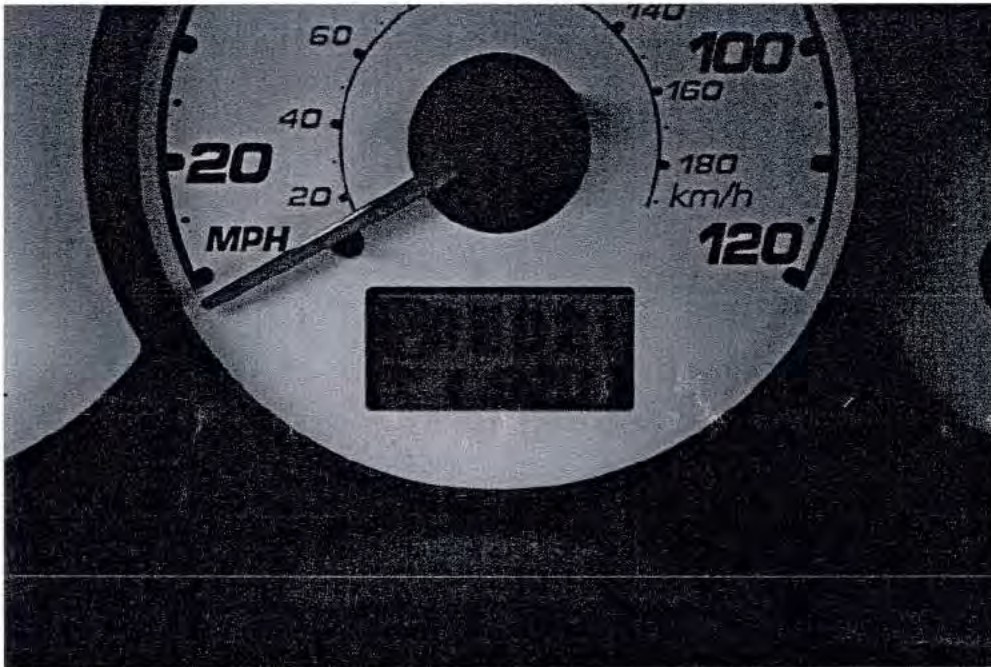
8. Wiring connected to brake control module is damaged from heat exposure originating from the module, not the result of wiring failure related to the fire cause.



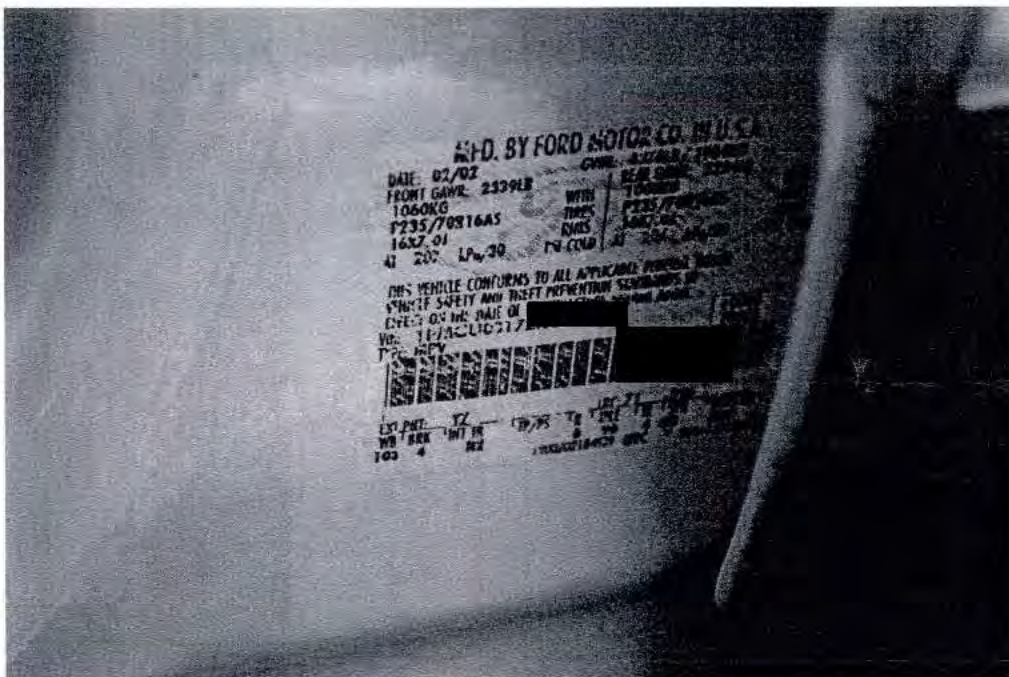
9. ABS brake control module 40-amp fuse is not blown.



10. No fire damage inside the vehicle.



11. Mileage at the time of my inspection.



12. Vehicle identification label.



BEGINNING OF CONTACT
04/17/2009

VOICE OF THE CUSTOMER TRACKING SYSTEM

09.53.40

REGION: C3 MEMPHIS	OGC ISSUE	CASE NBR: 0580401039
VIN: 1FMYU03102K	ZONE: A01	OPENED: 04/13/2009
	ENGINE: 1	CLOSED: 04/13/2009
	VEH TYPE: T	

LAST NAME:		FIRST NAME:		STATUS:	CLOSED
TITLE:				MI:	G
ADDRESS:		STATE:	MS	ZIP:	
CITY:		MODEL:	ESCAPE XLT 4X2		
HOME PHONE:		SALES CODE:	F23408	P & A:	05848
MODEL YEAR:	2002				
MILEAGE:	160000				
DEALER NAME:	HOMER SKELTON FORD,				
REASON CODE:	0792 LEGAL - ACCIDENT / FIRE				
SYMPTOMS:	704100 FIRE/SMOKE VISIBLE FLAME				

ORIGIN: CACI38 - US CONCERN CASE BASE COMMUNICATION: PHONE
ACTION: 792 - CONTACT ADVANCED TO OGC - FIRE
DOCUMENT: ANALYST: SLOOK SANDRA LOOK (SLOOK)

DATE: 04/13/2009 TIME: 16.07.19 :
ACTION DATA/COMMENTS:

CUSTOMER SAID: -HER VEH CAUGHT ON FIRE 4/5/2009-FIRE WAS UNDER THE WIRES UNDER THE HOOD-VEH CURRENTLY AT DLR FOR REPAIRS -NO FIRE DEPT CALLED-CUST PUT OUT THE FIRE-USED FIRE EXTINGUISHER-HAS NOT FILED CLAIM WITH INSURANCE COMPANY-CUST HAS SEEN RECALLS ON THE INTERNET FOR THE SAME ISSUE SHE HAS WITH HER VEH-DLR TOLD CUST HER VEH HAS NO RECALLS-DLR SAYS THE CUSTOMER NEEDS-INTERLOCK ABS MODULE-MASTER CYLINDER LEAKING-\$2400 FOR REPAIRS-CUST SEEKING IF THESE PARTS ARE ON RECALL-DEALER SAID: HOMER SKELTON FORD 6950 HANNA COVE OLIVE BRANCH, MS 38654 TEL: (662) 890-8875 CHARLES TURNER SERVICE CRC ADVISED: I WILL FORWARD YOUR INFORMATION TO FORD'S OFFICE OF THE GENERAL COUNSEL. YOU SHOULD RECEIVE A WRITTEN RESPONSE WITHIN 15 BUSINESS DAYS TO YOUR CONCERN ***NOTE TO CSR: PLEASE REMEMBER TO VERIFY ALL CUSTOMER CONTACT INFORMATION BEFORE SENDING ISSUE.===ADVISED CUST THAT THERE ARE NO RECALLS ON HER VEH REGARDING THE FIRE SHE HAD UNDER THE HOOD

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BEGINNING OF CONTACT
05/01/2009

VOICE OF THE CUSTOMER TRACKING SYSTEM

10.03.45

REGION: A1 SELECT DEALER OGC ISSUE CASE NBR: 0460101189
VIN: 1FMYU04162 ZONE: A03 OPENED: 04/28/2009
ENGINE: 1 VEH TYPE: T CLOSED: 04/28/2009

LAST NAME: [REDACTED] FIRST NAME: [REDACTED] STATUS: CLOSED
TITLE: [REDACTED] MI: [REDACTED]
ADDRESS: [REDACTED]
CITY: RANDLEMAN STATE: NC ZIP: [REDACTED]
HOME PHONE: [REDACTED]
MODEL YEAR: 2002 MODEL: ESCAPE XLT 4X4
MILEAGE: 110000
DEALER NAME: ASHEBORO FORD LINCOLN SALES CODE: L26035 P & A: 02509
REASON CODE: 0792 LEGAL - ACCIDENT / FIRE
SYMPTOMS: 704100 FIRE/SMOKE VISIBLE FLAME

ORIGIN: CACI38 - US CONCERN CASE BASE COMMUNICATION: PHONE
ACTION: 792 - CONTACT ADVANCED TO OGC - FIRE
DOCUMENT: ANALYST: JSHEIR1 SHEIR JAYMIE

DATE: 04/28/2009 TIME: 12.46.49:
ACTION DATA/COMMENTS:

CUSTOMER SAID: -VEH CAUGHT ON FIRE-HAPPENED 4/27-NO OTHER DAMAGES-VEH WAS OFF-PUT FIRE OUT HIMSELF-TOOK VEH TO MECH AND WAS TOLD THE ABS CAUGHT FIRE-MECH TOLD CUST THERE WAS A RECALL ON ABS-NEVER RECEIVED A RECALL ON THE ABS MODULE 3/07-NO FIRE DEPARTMENT INVOLVED-NO INSURANCE COMPANY INVOLVED-VEH IS REPAIRABLE-VEH CANNOT GET OUT OF PARK-VEH IS AT CUST HOUSE 141 WORTHVILLE RD RANDALLMAN NC 27317-CLOSEST DLR IS ASHEBORO FORD LINCOLN -WANTS VEH REPAIRED-CRC ADVISED: I WILL FORWARD YOUR INFORMATION TO FORD'S OFFICE OF THE GENERAL COUNSEL. YOU SHOULD RECEIVE A WRITTEN RESPONSE WITHIN 15 BUSINESS DAYS TO YOUR CONCERN.***NOTE TO CSR: PLEASE REMEMBER TO VERIFY ALL CUSTOMER CONTACT INFORMATION BEFORE SENDING ISSUE.-ABS RECALL COMPLETED 7/07 07S51

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BEGINNING OF CONTACT
09/05/2008

VOICE OF THE CUSTOMER TRACKING SYSTEM

08.00.02

REGION: A1 SELECT DEALER OGC ISSUE CASE NBR: 1562232488
VIN: 1FMYU03143K ZONE: A04 OPENED: 09/04/2008
ENGINE: 1 VEH TYPE: T CLOSED: 09/04/2008

LAST NAME: [REDACTED] FIRST NAME: [REDACTED] STATUS: CLOSED
TITLE: [REDACTED] MI: [REDACTED]
ADDRESS: [REDACTED]
CITY: MANCHESTER STATE: GA ZIP: [REDACTED]
HOME PHONE: [REDACTED]
MODEL YEAR: 2003 MODEL: ESCAPE XLT 4X2 4-DR
MILEAGE: 104000
DEALER NAME: LANGDALE FORD-LINCO SALES CODE: F21514 P & A: 09430
REASON CODE: 0792 LEGAL - ACCIDENT / FIRE
SYMPTOMS: 704100 FIRE/SMOKE VISIBLE FLAME

ORIGIN: CACI38 - US CONCERN CASE BASE COMMUNICATION: PHONE
ACTION: 792 - CONTACT ADVANCED TO OGC - FIRE
DOCUMENT: ANALYST: TLEVIN4 LEVIN (TLEVIN4),TERRY-LYNN

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DATE: 09/04/2008 TIME: 15.37.02:
ACTION DATA/COMMENTS:

SEP 05 2008

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GENERAL COUNSEL

CUSTOMER SAID: -TOOK VEH TO FORD DEALER AND TECH STATED THIS VEH HAS NO RECALL-CUST STATES INTERNET IS STATING THERE IS A RECALL FOR THE WIRE HARNESS-VEH CAUGHT ON FIRE ON SUNDAY 3 1, 2008-VISIBLE FLAMES CAME FROM UNDER THE HOOD-CUST PUT OUT THE FIRE-INSURANCE COMPANY WAS NOT CONTACTED-VEH IS CURRENTLY W/ THE CUSTOMER-NO INJURIES-NO STRUCTURAL DAMAGE-VEH IS STILL DRIVEABLE BUT THE VEH HAS NOT BEEN DIAGNOSED BUT THE CUST DISCONNECTED THE WIRE HARNESS AND STILL HAS THE PART-CUST STATES HIS VEH SHOULD HAVE HAD THE SPEED CONTROL RECALL AND THIS IS WHY HIS VEH CAUGHT ON FIRE-DEALER SAID: LANGDALE FORD-LINCOLN-MERCURY 2850 HIGHWAY 85 EAST MANCHESTER, GA 31816 TEL: (706) 846-2125 CRC ADVISED: I WILL FORWARD THIS INFORMATION TO THE FORD OFFICE OF THE GENERAL COUNSEL. YOU WILL RECEIVE WRITTEN NOTIFICATION WITHIN 10 BUSINESS DAYS WHICH YOU WILL NEED TO RESPOND TO IN WRITING. ***NOTE TO CSR: PLEASE REMEMBER TO VERIFY ALL CUSTOMER CONTACT INFORMATION BEFORE SENDING ISSUE MR. [REDACTED]



BEGINNING OF CONTACT
03/16/2009

VOICE OF THE CUSTOMER TRACKING SYSTEM

13.42.07

REGION: C3 MEMPHIS OGC ISSUE CASE NBR: 1377250689
VIN: 1FMYU03161 ZONE: A04 OPENED: 03/09/2009
ENGINE: 1 VEH TYPE: T CLOSED: 03/09/2009

LAST NAME: TITLE: FIRST NAME: STATUS: CLOSED
ADDRESS: MI: E
CITY: WEST POINT STATE: MS ZIP:
HOME PHONE: MODEL YEAR: 2001 MODEL: ESCAPE XLT 4X2
MILEAGE: 120000
DEALER NAME: PREMIER FORD L-M IN SALES CODE: F23462 P & A: 05928
REASON CODE: 0792 LEGAL - ACCIDENT / FIRE
SYMPTOMS: 704100 FIRE/SMOKE VISIBLE FLAME

ORIGIN: CACI38 - US CONCERN CASE BASE COMMUNICATION: PHONE
ACTION: 792 - CONTACT ADVANCED TO OGC - FIRE
DOCUMENT: ANALYST: JMORDEN4 JAIMIE MORDENTI (JMORDEN4)

DATE: 03/09/2009 TIME: 10.28.44;
ACTION DATA/COMMENTS:

CUSTOMER SAID: -DATE OF FIRE 3/8/2009-FIRE STARTED UNDER THE HOOD-VEH IS CURRENTLY AT CUST'S HOME-THERE WAS NO FIRE REPORT FILED-THERE WAS NO OTHER DAMAGE, EXCEPT TO THE VEH-HAS NOT FILED A CLAIM WITH THE INSURANCE COMPANY-FEELS THE VEH IS REPAIRABLE-VEH WAS NOT RUNNING WHEN THE FIRE STARTED-FOUND A RECALL FOR THE ABS MODULE-VEH IS NOT DRIVEABLE--SEEKING FOR FORD TO REPAIR THE VEH AND TO GET A RENTAL VEH-ADDRESS IS 5798 HIGHWAY 47; WEST POINT, MS; 39773-CELL PHONE FOR C/W IS 6622957590 -OWNERS CELL PHONE 6622958368 -THERE IS NO HOME PHONE-DEALER SAID: -PREMIER FORD L-M INC2120 HIGHWAY 45 NORTH COLUMBUS, MS 39705TEL:(662) 327-3673-NONECRC ADVISED: I WILL FORWARD YOUR INFORMATION TO FORD'S OFFICE OF THE GENERAL COUNSEL. YOU SHOULD RECEIVE A WRITTEN RESPONSE WITHIN 15 BUSINESS DAYS TO YOUR CONCERN.***NOTE TO CSR: PLEASE REMEMBER TO VERIFY ALL CUSTOMER CONTACT INFORMATION BEFORE SENDING ISSUE**VERIFIED ALL CUST CONTACT INFO***NOTE TO LEGAL ACCORDING TO AWS RECALL 07S51 WAS PERFORMED 2/18/09**AS PER TL KIE SHIA ADV CUST SHE WOULD NEED TO SPEAK WITH HER INSURANCE COMPANY ABOUT A RENTAL VEH AND THEY HAVE THE RIGHT TO PURSUE CLAIMS AGAINST FORD

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