

PE13-014

FORD

7/10/2013

Appendix E

Peer - Lawsuits and Claim



Action Detail

VIN: 1FTWW33P55E	Year: 2005	Model: F-SERIES SUPER DUTY	Print Action Detail
Name: [REDACTED]	Owner Status: Original	WSD: 2005-02-24	Case: [REDACTED]
Symptom Desc: STRG/HANDLING FUNCTION LOSS OF STRG		Primary Phone: [REDACTED]	
Reason Desc: LEGAL - ACCIDENT		Secondary Phone:	
Issue Type: 07 LEGAL	Issue Status: OPEN	Dealer: SOUTHLAND FORD INC	
Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION-FD		P & A Code: 00333	
Odometer: 22820 MI	Comm Type: FAX		
Action Date: 01/30/2006	Action Time: 08:55:00:403	Action Data: Yes	
Analyst Name: LEICH,CHERIE	Analyst: CLEICH		

COMMENTS: *****PRODUCT LIABILITY*****FAX RECEIVED 1-30-06.DEALER CONTACT: CHRIS GOODMAN. CUSTOMER ALLEGES STEERING GEAR CAME APART. HE LOST STEERING AND BRAKES CAUSING ACCIDENT.CUSTOMER REQUESTS CONTACT FROM FORD REPRESENTATIVE.

[Update Issue](#) [Close Issue](#)

[OASIS](#) [Warranty History](#) [ESP/Recall](#)

Keller, Kristian (P.)

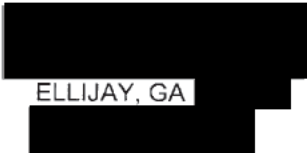
From: Cpform, D (D.)
Sent: Monday, January 30, 2006 8:05 AM
To: Ordcalp, F (F.)
Subject: Dealer Request For Consumer Affairs Review

Dealer Request For Consumer Affairs Review - All Markets

Dealership Name: SOUTHLAND FORD
Requesting Dealer: SOUTHLAND FORD
Contact Person: CHRIS GOODMAN
Telephone: 229-567-3301
Email Address: cgoodman@mchsi.com
PA Code: 00333
Region: ATLANTA
City: ASHBURN
Dealer State: GA
Fax Number: 229-567-0524
WSD: 12/15/2004
Vehicle Year: 2005
Vehicle Model: FORD F350 SUPER DUTY
Vehicle VIN: 1FTWW33P55E [REDACTED]
Mileage: 22820
Customer Name: [REDACTED]
Street Address: [REDACTED]
City: ELLIJAY
State: Georgia
Zip Code: [REDACTED]
Home Phone: [REDACTED]
Work Phone: [REDACTED]
Customer Region: 21 - Atlanta
Incident Involves: Accident
Date of Incident: [REDACTED] 706-
County in which incident occurred: TURNER
Is Alleging Defect: Yes
Alleging defect detail: STEERING GEAR CAME APART/LOSS STEERING AND BRAKES
Police Report Filed: No
Insurance Company Contacted: N
Coach Builder State: AK - Alaska
Resolution Sought Detail: VEHICLE REPAIRED
Comments: CUSTOMER WAS UNHARMED. DAMAGE ESTIMATE INCLUDED

This email was automatically generated. Please do not reply to this email. No one monitors the inbox for this email address.

THE STEERING GEAR BROKE CAUSING FAILURE OF STEERING AND FLUID LOSS LED TO
LOSS OF ASSIST IN BRAKING DUE TO HYDROBOOST BRAKES.
CHRIS GOODMAN
SERVICE MANAGER
SOUTHLAND FORD



REPAIR ORDER # 4252 LINE 01
DEALER: SOUTHLAND FORD
757 NORTH STREET
ASHBURN, GA 31714
(229) 567-3301
P&A : 00333

ACTION	QTY					DESCRIPTION
REPLACE	1	STEERING GEAR	5C3Z3504AA	1.7	3504A	761.96
REPLACE	1	BUMPER	5C3Z17757BA	1.2	17757A	350.82
REPLACE	1	BUMPER COVER	6C3Z17D957BAPTM	.8	17957A	205.26
REFINISH		BUMPER COVER		1.8	P46	
REPLACE	1	FENDER	F81Z16006AA	2.0	B16006	204.33
REPLACE	2	TIRES 245/75/17	90O4 69928	.4	1007AF	277.90
REPAIR		LF DOOR		3.0	B20125	
REFINISH		LF DOOR		2.0	P18	
REPLACE	1	DECAL	5C3Z9925622BAA	.4	B25622	30.17
REPLACE	1	STRIPE	5C3Z2520001DAC	1.4	B52000	27.02
REPLACE	1	STRIPE	5C3Z2520000DAC		INC	27.02
REPLACE	1	STRIPE	5C3Z26255A67CAB		INC	19.94
REPLACE	1	STRIPE	5C3Z26255A66CAB		INC	19.94
REPLACE	1	STRIPE	5C3Z25290D13BAB		INC	24.84
REPLACE	1	STRIPE	5C3Z25290D12BAB		INC	24.84
REPLACE	1	WHEEL	5C3Z1007BB		INC	448.76

TOTALS

PARTS = \$2422.80
MECHANICAL LABOR 3.6 HRS @ 48.56 = \$174.81
BODY LABOR 12.8 HRS @ 48.56 = \$621.57
PAINT LABOR 9.4 HRS @ 48.56 = \$456.46
PAINT/MATERIALS = \$ 194.11
TOTAL ESTIMATE = @ \$3869.75

New User Guide Dealer Email ID & Password Help/Contact Us Log Out



Welcome, CHRISTOPHER GOODMAN
Monday, January 30, 2006

Product Site Search +
More Search Options

Brand Ford Markets FCSD Markets Ford Credit Region Branch
Ford Southeast - Atlanta Southeast Mid-Southern-FCNA Macon

Message Center Sales Finance Parts & Service Ford Stock: 8.65 0.00

Parts & Service

Forms

- Awards & Recognitions
- Body Shop
- Communications
- Customer Satisfaction
- Extended Service Plan
- Marketing & Advertising
- Parts Department Tools
- Parts Ordering & Receiving
- Parts Product Line Information
- Parts Wholesaling
- Service Tools
- Technical Tools
- Training & Certification
- Warranty Administration & Parts Returns

Forms

Dealer Request For Consumer Affairs Review - All Markets Go +

IMPORTANT - DO NOT PERFORM REPAIRS UNTIL AUTHORIZED!

Dealer Request For Consumer Affairs Review

*****Note: this form is for RETAIL vehicles ONLY***
Fleet vehicles need to be referred to the North American Fleet Service Office @ 800-343-5338**

Pursuant to the W&P Manual, the Service manager is required to complete a Dealer Request for Consumer Affairs Review form if he/she suspects legal action such as, alleged accidents or fires, may be taken. This form includes customer and vehicle information as well as a description of the customer's allegations.

*****Note: All fields are required and must be filled in accordingly before submitting this form*****

*****NOTE: You also have the option of printing this form and then faxing the fully completed form to 313-845-5668 or 313-845-5555*****

DETAILS OF INCIDENT:

Dealership Name: SOUTHLAND FORD
 Requesting Dealer: SOUTHLAND FORD
 Contact Person: CHRIS GOODMAN
 Phone Number: 229-567-3301
 Email Address: cgoodman@mchsi.com
 P & A Code: 00333
 Region: ATLANTA
 City: ASHBURN
 State: GA - Georgia
 Fax Number: 229-567-0524

CUSTOMER/VEHICLE INFORMATION:

WSD: 12/15/2004
 Vehicle Year: 2005
 Vehicle Model: FORD F350 SUPER DU
 Vehicle VIN: 1FTWW33P55E [REDACTED]
 Mileage: 22820
 Customer Name: [REDACTED]

UPS Tracking

Reference Numl

Destination Zip

Track Shipn

Street Address: [REDACTED]

City: ELLIJAY

State: GA - Georgia

Zip Code: [REDACTED]

Home Phone: [REDACTED]

Work Phone: [REDACTED]

Region: 21 - Atlanta

DEALER INFORMATION:

*****Note: DO NOT PUT THE VEHICLE IN STORAGE WITHOUT THE APPROVAL OF*****

*****THE LITIGATION PREVENTION DEPARTMENT*****

*****NOTE: SEND AUTHORIZATION REQUEST TO FORDCALP@FORD.COM*****

Incident Involves:

Accident Fire Injury Medical Attention Sought

Date of Incident: [REDACTED]

County in which incident occurred: TURNER

Is customer alleging a component defect CAUSED the incident: Yes No

If yes, what type & details: STEERING GEAR CAME APART/LOSS
STEERING AND BRAKES

If no, refer to Escalated Concern Handling section of the Customer Handling Roadmap

Was a police report filed: Yes No

If yes, where

Has the insurance company been contacted: Yes No

What did the insurance company advise?

Name and phone number of owner's insurance company & agent's name:

If the vehicle is a conversion unit, who is the coach builder?

City:

State: AK - Alaska

Zip Code:

RESOLUTION THAT CUSTOMER IS SEEKING:

VEHICLE REPAIRED

COMMENTS:

CUSTOMER WAS UNHARMED. DAMAGE ESTIMATE INCLUDED

Submit →





















All Action Details for Issue

Print

VIN: 1FTWW33P55E [REDACTED] Year: 2005 Model: F-SERIES SUPER DUTY Case: [REDACTED]
 Name: [REDACTED] Owner Status: Original WSD: 2005-02-24
 Symptom Desc: STRG/HANDLING FUNCTION LOSS OF STRG Primary Phone: [REDACTED]
 Reason Desc: LEGAL - ACCIDENT Secondary Phone:
 Issue Type: 07 LEGAL Issue Status: CLOSED

Action: OPEN LEGAL CONTACT - PRODUCT LIABILITY - ACCIDENT
 Dealer: 00333 SOUTHLAND FORD INC Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION-FD
 Odometer: 22820 MI Comm Type: FAX
 Analyst Name: LEICH,CHERIE Analyst: CLEICH
 Action Date: 01/30/2006 Action Time: 08.55.00.403 Action Data: Yes

Comments *****PRODUCT LIABILITY*****FAX RECEIVED 1-30-06.DEALER CONTACT: CHRIS GOODMAN. CUSTOMER ALLEGES STEERING GEAR CAME APART. HE LOST STEERING AND BRAKES CAUSING ACCIDENT.CUSTOMER REQUESTS CONTACT FROM FORD REPRESENTATIVE.

Data Element Name	Data Value
ANALYST ID	WHILL2

Action: MAKE OUTBOUND CALL TO DEALER
 Dealer: 00333 SOUTHLAND FORD INC Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION
 Odometer: 22820 MI Comm Type: PHONE
 Analyst Name: HILL,WANNETTA Analyst: WHILL2
 Action Date: 01/31/2006 Action Time: 12.15.40.918 Action Data: No

Comments LPA CONTACTED CHRIS GOODMAN AND DLR WILL TAKE PICTURES, PROVIDE INSPECTION REPORT AND ESTIMATE ON DAMAGES

Action: REQUEST FOR VEHICLE INSPECTION - DEALER
 Dealer: 00333 SOUTHLAND FORD INC Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION
 Odometer: 22820 MI Comm Type: OTHER
 Analyst Name: HILL,WANNETTA Analyst: WHILL2
 Action Date: 01/31/2006 Action Time: 12.16.00.795 Action Data: No

Comments LPA CONTACTED CHRIS GOODMAN AND DLR WILL TAKE PICTURES, PROVIDE INSPECTION REPORT AND ESTIMATE ON DAMAGES

Action: MANAGEMENT APPROVAL OF OFFER
 Dealer: 00333 SOUTHLAND FORD INC Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION
 Odometer: 22820 MI Comm Type: OTHER
 Analyst Name: BOWERS

(MBOWERS),PEGGY

Analyst: MBOWERS**Action Date:** 02/08/2006**Action Time:**

10.02.27.595

Action Data: No**Comments** MANAGEMENT APPROVAL OF VEHICLE REPAIR IN THE AMOUNT OF \$3,869.75.**Action:** CLOSING COMMENTS - DEALER AUTHORIZATION CODE PENDING**Dealer:** 00333 SOUTHLAND FORD INC**Origin Desc:** CONSUMER AFFAIRS - LITIGATION
PREVENTION**Odometer:** 22820 MI**Comm Type:** FAX**Analyst Name:****Analyst:** WHILL2

HILL,WANNETTA

Action Date: 02/08/2006**Action Time:**

11.46.24.882

Action Data: No**Comments** LPA FAXED RELEASE AND OFFER LETTER TO CHRIS GOODMAN AT SOUTHLAND FORD. PER CHRIS, THE STEERING GEAR HAS ALREADY BEEN REPLACED UNDER WARRANTY.. DLR WILL TRY TO SUBMIT TIRES UNDER WARRANTY AS CONSEQUENTIAL DAMAGE. DUE TO ACCIDENT OCCURRING WHILE CUSTOMER WAS TRAVELING, THE BODY REPAIRS WILL NEED TO BE COMPLETED BY THE CUSTOMER'S LOCAL DLR. LPA LEFT MESSAGE FOR SHAWN CARTER, SVC MGR, AT RONNIE THOMPSON TO CONTACT HER REGARDING THE BODY REPAIRS.**Action:** UPDATE CONTACT STATUS**Dealer:** 00333 SOUTHLAND FORD INC**Origin Desc:** CONSUMER AFFAIRS - LITIGATION
PREVENTION**Odometer:** 22820 MI**Comm Type:** EMAIL**Analyst Name:****Analyst:** WHILL2

HILL,WANNETTA

Action Date: 04/12/2006**Action Time:**

15.53.53.326

Action Data: No**Comments** CUSTOMER WOULD NOT SIGN RELEASE AND SUBMITTED REPAIRS THOROUGH HIS INSURANCE CARRIER. NOW PER STEVE AT RONNIE THOMPSON FORD, THE INSURANCE COMPANY IS SUBMITTING A SUBROGATION REQUEST. LPA ADVISED STEVE THAT SUBROGATION CLAIMS ARE HANDLED BY OGC. LPA PROVIDED STEVE THE SUBROGATION ADDRESS FOR ASSISTANCE.

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STANDARD CLAIMS LIST

AWS Online Report

Run Date: 05-MAY-2006

Note: All Costs are in US Dollars Server Name: AWS New Prod AWSPPRDDG

VIN	AWS VL	WERS VL	MKT DER	BODY CAB	VER SERIES	DRIVE TYPE	PLANT CD	TRANS CD	ENG COD	PROD DATE	WARR DATE	SELLING DEALER	SELL CNT	TIS	QRT	WCC	PREF	BASE	SUFF	VRT	VFG	CCC	CD
1FTWW33P55E [REDACTED]	F7	T/F7	F	T/BC	T/CD	T/E	A1	T/BE	T/YB	15-12-04	24-02-05	121430	USA	11	*	1B01	3C3Z	6608	BA	S11	V44	L85	D8
AWS Claim Key:	3016403	Doc #:	08710701	Trx Code:	E84	Labor Hrs:	12	Labor Cost:	808.8	Material Cost:	177.44	Total Cost:	986.24										
Dir Cd-Sub Cd:	00302-*	Name:	RONNIE THOMPSON FORD-MERCURY		Ph:	706-2762777	St:	GA	Ctry Cd:	USA	Reg Cd:	NA	Repr Date:	28-DEC-2005	DIST(Mile):	22123							
Cust Comments:	CUSTOMER STATES VEHICLE HAS OIL LEAK.																						
Tech Comments:	FAILED SEAL GASKET INSPECTED, R/T TRANSMISSION ASSEMBLY, REPLACED REAR MAIN SEAL, RESEALED TIMING COVER, REPLACED OIL PUMP, WATER PUMP O RING, TIMING COVER SEALS, AND FRONT CRANK SEAL.																						
1FTWW33P55E [REDACTED]	F7	T/F7	F	T/BC	T/CD	T/E	A1	T/BE	T/YB	15-12-04	24-02-05	121430	USA	11	*	5001	5C3Z	3504	AA	S10	V89	C50	01
AWS Claim Key:	3699893	Doc #:	00425201	Trx Code:	E84	Labor Hrs:	2.7	Labor Cost:	131.11	Material Cost:	1233.48	Total Cost:	1364.59										
Dir Cd-Sub Cd:	00333-*	Name:	SOUTHLAND FORD INC		Ph:	229-5673301	St:	GA	Ctry Cd:	USA	Reg Cd:	NA	Repr Date:	19-JAN-2006	DIST(Mile):	22820							
Cust Comments:	CUSTOMER STATES LOSS OF STEERING CAUSED ACCIDENT																						
Tech Comments:	INSPECT AND FOUND SNAP RING THAT RETAINS STEERING GEAR INTACT FAILED, CAUSING LOSS OF POWER AND LOSS OF POWER STEERING FLUID CAUSED LOSS OF BRAKING DUE TO HYDROBOOST BRAKES SYSTEM. REPLACE STEERING GEAR AND TEST FOR LEAKS. OK, REPLACED DAMAGED LUG STUDS BENT DURING ACCIDENT. HAD TO CUT OFF STUDS, RENEW LUG NUTS AND LF AND LOR OUTSIDE TIRES DAMAGED ALSO. CUSTOMER TO HAVE COSMETIC REPAIRS FINISHED A																						
1FTWW33P55E [REDACTED]	F7	T/F7	F	T/BC	T/CD	T/E	A1	T/BE	T/YB	15-12-04	24-02-05	121430	USA	11	*	*	*	*	*	SXX	V00	*	*
AWS Claim Key:	3538932	Doc #:	00425202	Trx Code:	05E15	Labor Hrs:	1	Labor Cost:	48.56	Material Cost:	92.66	Total Cost:	141.22										
Dir Cd-Sub Cd:	00333-*	Name:	SOUTHLAND FORD INC		Ph:	229-5673301	St:	GA	Ctry Cd:	USA	Reg Cd:	NA	Repr Date:	19-JAN-2006	DIST(Mile):	22820							
Cust Comments:	RECALL 05E15																						
Tech Comments:	PERFORM RECALL 05E15																						
1FTWW33P55E [REDACTED]	F7	T/F7	F	T/BC	T/CD	T/E	A1	T/BE	T/YB	15-12-04	24-02-05	121430	USA	11	*	*	*	*	*	SXX	V00	*	*
AWS Claim Key:	3538933	Doc #:	00425203	Trx Code:	59B01	Labor Hrs:	.3	Labor Cost:	14.57	Material Cost:	0	Total Cost:	14.57										
Dir Cd-Sub Cd:	00333-*	Name:	SOUTHLAND FORD INC		Ph:	229-5673301	St:	GA	Ctry Cd:	USA	Reg Cd:	NA	Repr Date:	19-JAN-2006	DIST(Mile):	22820							
Cust Comments:	RECALL 59B01																						

PE13-014 000019LCPV

Tech Comments: PERFORM RECALL 59B01

(FTWW33P55E) [REDACTED] 7	T/F7	F	T/BC	T/CD	T/E	A1	T/BE	T/YB	15-12-04	24-02-05	121430	USA	11	*	*	*	*	SXX	V00	*	*
AWS Claim Key:	3538934	Doc #:	00425204	Trx Code:	05B32	Labor Hrs:	2	Labor Cost:	9.71	Material Cost:	0	Total Cost:	9.71								
Dlr Cd-Sub Cd:	00333-*	Name:	SOUTHLAND FORD INC	Ph:	229-5673301	St:	GA	Ctry Cd:	USA	Reg Cd:	NA	Repr Date:	19-JAN-2006	DIST(Mile):	22820						
Cust Comments:	RECALL 05B32																				
Tech Comments:	PERFORM RECALL 05B32																				

Any comments? You can contact



webmaster

PE13-014 000020LCPV

Server Name : AWS New Prod AWSPPRDDG

Claim Detail Report

Note: All costs are in US dollars

Model Year = 2005; Claim Key = 3699893

Vehicle Information

Model Year: 2005
 Market Derived: F - FORD
 Body/Cab Type: T/BC - DOUBLE CAB (CREW CAB)
 Version/Series: T/CD-350 SERIES
 Drive Type: T/E-4 WHL L/H PART TIME DRIVE
 Vehicle Line: T/F7-F250HD/350/450/550 [99-07]
 Warranty Start Date: 24-FEB-2005
 Production Date: 15-DEC-2004
 VIN: 1FTWW33P55E [REDACTED]

Dealer Information:

Dealer Name SOUTHLAND FORD INC
 Dealer Code: 00333 - *
 Address: 757 NORTH STREET
 City: ASHBURN
 State: GA Zip Code:317145189
 Country: USA Region Code: NA
 Phone: (229)567-3301

Claim Information

Document Number: [REDACTED]
 Repair Date: 19-JAN-2006
 Distance: 22820
 TIS: 11

Expense Information

Customer Paid Amount: 0
 Deductible Amount: 0
 Dealer Paid Amount: 0
 Labor Cost: 131.11
 Misc. Expense Amount: 0
 Part Markup Amount: 388.38
 Material Cost: 1233.48
 Total Cost Gross: 1364.59

Cust. Concern Code: C50 - OTHER STEERING/HANDLING AND RIDE TROUBLES
 Condition Code: 01 - BROKEN/CRACKED

PE13-014 000021LCPV

Technician Comment: INSPECT AND FOUND SNAP RING THAT RETAINS STEERING GEAR INTACT FAILED. CAUSING LOSS OF POWER AND LOSS OF POWER STEERING FLUID CAUSED LOSS OF BRAKING DUE TO HYDROBOOST BRAKES SYSTEM. REPLACE STEERING GEAR AND TEST FOR LEAKS. OK. REPLACED DAMAGED LUG STUDS BENT DURING ACCIDENT. HAD TO CUT OFF STUDS. RENEW LUG NUTS AND LF AND LOR OUTSIDE TIRES DAMAGED ALSO. CUSTOMER TO HAVE COSMETIC REPAIRS FINISHED
A

Customer Comment: CUSTOMER STATES LOSS OF STEERING CAUSED ACCIDENT

Labor Op Code	Labor Op Description	Labor Op Cost
3504A	STEERING GEAR ASSEMBLY REMOVE AND INSTALL OR REPLACE	82.55
1007AT	TIRE(S) REPLACE	48.56

Causal Flag	Full Part Number	Part Description	Part CPSC	Part Quantity	Extended Amount
Y	STG 152 *		110201	1	761.96
N	2C2Z 1012 AA	WHEEL LUG NUT	0502XX	8	51.24
N	2C2Z 1107 AA	HUB BOLT	050301	8	112.8
N	9004 69928 *		NANANA	2	307.48

DTC Sections: MIL. Light ON = N

Flag	Test Type	Malfunction Cd	Malfunction Cd Description	Monitor Cd	Monitor Cd Description
	KOEO	M343DR214204,M343DR214304			
	UNDF	M343DR211305,M345DR211405			

Any comments? You can contact



webmaster

PE13-014 000022LCPV



SOUTHLAND FORD, INC.

757 North Street Ashburn, GA 31714
229-567-3301
COMPLETE WRECKER SERVICE

VD	04252	VIN	1FTWW33P55E	DATE IN	01/19/06	
EAR	2005	MAKE	FORD	MODEL	F350	
PLATE	22R20	MILEAGE	22820	PREVIOUS USE	00/00/00	
NAME	ELLIJAY GA				TIME IN	09:18
DATE					DATE OUT	02/09/06
NAME					NAME	CHRIS

(1) CUSTOMER STATES LOSS OF STEERING RESULTING IN ACCIDENT

3504A	01	C50	A	17	82.55		
1007AF			A	4	19.42		
1007AD			A	6	29.14		
1107AT			A	11	53.42		
8TG152		(GEAR ASY - STE)		1	761.96		
2C2E1012AA		(NUT - WHEEL)		8	51.28		
2C2E1107AA		(BOLT - WHEEL)		8	112.80		
900469928		(LT245/75R17)		2	240.00		
Warranty Claim Repair Type:R1 - 01					Total Labor	184.53	
Customer Concern Code: C50					Total Parts	1166.04	
Condition Code: 01					Total Repair (Warranty)		1350.57
(Tech:06)							

(2) RECALL 05E15
PERFORM RECALL 05E15

05E15M			A	10	48.56		
(F)5C3Z9J460A		(SENSOR ASY)		1	92.66		
Warranty Claim Repair Type:R1 - 01					Total Labor	48.56	
Program Code: 05E15					Total Parts	92.66	
(Tech:06)					Total Repair (Warranty)		141.22

(3) RECALL 59B01
PERFORM RECALL 59B01

59B01A			A	3	14.57		
Warranty Claim Repair Type:R1 - 01					Total Labor	14.57	
Program Code: 59B01					Total Repair (Warranty)		14.57
(Tech:06)							

(4) RECALL 05B32
PERFORM RECALL 05B32

05B32B			A	2	9.71		
Warranty Claim Repair Type:R1 - 01					Total Labor	9.71	
Program Code: 05B32					Total Repair (Warranty)		9.71
(Tech:06)							

Next Service MAY '06 Lube-Oil-Filter	257.37	.00	Labor	.00
	1258.70	.00	Parts	.00
	.00	.00	Sublet	.00
	.00	.00	Shop Supply	.00
	.00	.00	Oil/Grease	.00
	1516.07	.00	Sub Total	.00
	.00	.00	Tax	.00
	1516.07	.00	Total	.00

DISCLAIMER OF WARRANTIES
Any warranties on the product sold hereby are those made by the original manufacturer. The seller hereby expressly disclaims all warranties, whether expressed or implied, including any implied warranty of merchantability or fitness for a particular purpose, and neither recommends nor endorses any person or company for its ability to conduct business with the sale of said products. Any restriction contained herein shall not apply where prohibited by law.

X CUSTOMER SIGNATURE

Page 1 of 1 Job 04252
04252 Customer Copy



All Action Details for Issue

Print

VIN: 1FTWW33P55E [REDACTED] Year: 2005 Model: F-SERIES SUPER DUTY Case: [REDACTED]
 Name: [REDACTED] Owner Status: Original WSD: 2004-09-08
 Symptom Desc: STRG/HANDLING FUNCTION Primary Phone: [REDACTED]
 Reason Desc: LEGAL - ACCIDENT Secondary Phone: [REDACTED]
 Issue Type: 07 LEGAL Issue Status: CLOSED

Action: OPEN LEGAL CONTACT - PRODUCT LIABILITY - ACCIDENT
 Dealer: 06727 BEACH FORDING Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION-FD
 Odometer: 26705 MI Comm Type: EMAIL
 Analyst Name: LEICH,CHERIE Analyst: CLEICH
 Action Date: 03/20/2006 Action Time: 09.59.56.627 Action Data: Yes

Comments *****PRODUCT LIABILITY*****EMAIL RECEIVED 3-17-06.DEALER CONTACT: DENNIS MESSICK. CUSTOMER ALLEGES HE WAS MAKING A TURN AND THE TRUCK STARTED TO TRAVEL TOWARDS A LIGHT POLE. THE TRUCK WOULD NOT RESPOND TO TURNING THE STEERING WHEEL AND HE HIT THE LIGHT POLE.CUSTOMER REQUESTS CONTACT FROM FORD REPRESENTATIVE.

Data Element Name	Data Value
ANALYST ID	LFONSECA

Action: SEND ACKNOWLEDGEMENT LETTER TO CUSTOMER
 Dealer: 06727 BEACH FORDING Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION
 Odometer: 26705 MI Comm Type: MAIL
 Analyst Name: FONSECA, LOURDES NEARON (L.C.) Analyst: LFONSECA
 Action Date: 03/22/2006 Action Time: 13.20.15.961 Action Data: No

Comments LPA CALLED THE DEALERSHIP, INSURANCE IS CURRENTLY INVESTIGATING. DEALERSHIP STATES THAT THEY ARE UNABLE TO DETERMINE WHAT OCCURRED FIRST THE ACCIDENT OR THE MECHANICAL FAILURE. LPA W/SEND LETTER.

Action: REFER TO INSURANCE CARRIER - INSURANCE COMPANY ALREADY INVOLVED
 Dealer: 06727 BEACH FORDING Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION
 Odometer: 26705 MI Comm Type: MAIL
 Analyst Name: FONSECA, LOURDES NEARON (L.C.) Analyst: LFONSECA
 Action Date: 03/22/2006 Action Time: 13.33.11.151 Action Data: No

Comments LPA CALLED THE DEALERSHIP, INSURANCE IS CURRENTLY INVESTIGATING. DEALERSHIP STATES THAT THEY ARE UNABLE TO DETERMINE WHAT OCCURRED FIRST THE ACCIDENT OR THE MECHANICAL FAILURE. LPA W/SEND LETTER.

Ford Confidential



Office of the General Counsel

PRIVILEGED & CONFIDENTIAL
Ford Motor Company
Claims Department
P.O. Box 70
Dearborn, Michigan 48121-0070

July 7, 2006

Nationwide Insurance
110 Elwood Davis Rd.
North Syracuse, NY 13212
ATTENTION: LYNN KOENCK

RE: Your Insured: [REDACTED]
Your Claim #: [REDACTED]
DOL: 03-11-2006

Dear Ms. Koenck:

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

- 1. Attach your insured's statement with a complete description of the incident, including events that occurred prior to and subsequent to the loss. *(See Attached)*
- 2. A copy of the police and/or fire report. *(Not Available - Unk. if Report Done)*
- 3. Original color photographs of the vehicle's collision/fire damage & the alleged defective parts, from several different angles. *(See photos attached)*
- 4. Original color photographs of the inside of the vehicle showing the steering wheel, dash and roof areas. *(See Attached)*
- 5. Original color photographs of the accident / fire scene from several different angles. *(Not Available)*
- 6. Attach a copy of your expert's report and the expert's original color photographs. *(No Expert Retained at this time)*
- 7. Attach the repair estimate, repair order, or your total loss worksheet for the vehicle's damage and any losses associated with this incident, and copies of draft payments.
- 8. Attach the complete service history for the subject vehicle, including any tune-ups or oil changes. *(Not Available)*

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

- 9. What was the city and state of occurrence: Portsmouth, Virginia
- 10. The 17 digit vehicle identification number: 1FTWW33P55E [REDACTED]
- 11. What was the mileage at time of occurrence: 26705
- 12. What is the alleged defect: wrong steering box installed by manufacturer
- 13. Has the alleged defective part been repaired or replaced? (circle one) Yes or No

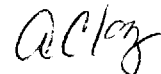
14. What is the current location of the vehicle, and the alleged defective part(s)?
With our policyholder.
15. List all after market additions or modifications that were made to the vehicle:
N/A
16. Was the engine running? (circle one) Yes or No
17. Were the keys in the ignition? (circle one) Yes or No
18. Was this vehicle purchased new or used: ~~Used~~ New
If purchased used, provide the date of purchase, mileage at the time of purchase, and from whom the vehicle was purchased: Beach Ford, Aug/2004

Once we are in receipt of the requested information, it will be reviewed and you will be notified of our decision concerning your claim. Should you not send all of the requested information and materials within 90 days, we will assume that you are not interested in pursuing a claim and we will close our file. Please note that your vehicle will not be inspected until all the above information has been submitted and a determination has been made as to whether an inspection is warranted.

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

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

Sincerely,



Andrew Chabot
Claims Analyst

Select Activity Logs

Claim Key: [REDACTED]
Policyholder: [REDACTED]
Claimant: N/A

Requester: KOENCKL
Print Date: August 1, 2006
Print Time: 8:47 AM

Date: 2006-07-10 Time: 10:05:30
Creator: TRANK66
Assignee: UNASSIGN
Cov:
Claimant:

RS Transcription For.. [REDACTED]
File Name: [REDACTED]
Insured: [REDACTED]
Claim No [REDACTED]
Person Gi [REDACTED]
Relationship to Accident: Insured Driver
Date Taken: 5/19/06
Date of Loss: 3/11/06
Interviewer: Alice Smith
Cov: Coll
ClassID: KOENCKL

Q: This is Alice Smith interviewing [REDACTED]

A: [REDACTED]
Q: [REDACTED]

A: Yes.

Q: And today is Friday, May 19th, 2006, accident date, [REDACTED] on claim number [REDACTED]
Mr [REDACTED] do I have your permission to take the recording?

A: Yes.

Q: Give me your complete name if you would, spell your first and last name?

A: [REDACTED] middle initial C, last name [REDACTED]

Q: Address with city and state?

A: Um, address is, uh, [REDACTED] and this in the city of Chesapeake, spelled C-h-e-s-a-p-e-a-k-e, Virginia. ZIP Code [REDACTED]

Q: Okay, what's the year, make, and model of the vehicle that you were driving?

A: 2005 F350 Ford Supra [inaudible] truck.

Q: Have you had any problems with the vehicle before?

A: Um, let's see, oh, yes.

Q: Uh, was it, did you get a recall letter or anything regarding the parts?

A: No, [inaudible] not.

Q: No?

A: No.

Q: Okay.

A: Well, you asked if I had any problems with the vehicle, you, you talking about the steering or you&

Q: Any prior problems with the vehicle?

A: Yes, yes, I've had problems with it before, yes.

Q: What kind of problems?

A: Uh, turbo charger, um, just a rear window not working, uh, brakes, um, just things like that.

Q: Was this under warranty?

A: Yes.

Q: And you never received a recall letter or anything about the part, right?

A: No.

Q: Okay, and when did you purchase your vehicle, do you remember?

A: Um, I think it was August of, uh, 2004 if I'm not mistaken, I, it could be a little bit, I mean was, um, like when the 2005, it was one of the first 2005's I think that hit the, uh, state of Virginia, I guess.

Q: Okay, have you had any prior accident, any prior collision?

A: No.

Q: Okay, now, tell me what happened?

A: Um, I was going down Airline Boulevard, uh, making a left hand turn, um, on, um, Winchester, uh, and going back to, uh, the chicken place there to get some lunch, and, uh, as I was making the turn, um, the, the, I just ran into the light pole right here and could not understand why I ran into the light pole. And, um, after the, uh, collision took place, um, my knee went into the dash and that's bothering me now, and, when I got out of the truck at the time, I tried to make a phone call and the, um, fire department is right across the street and they came running over to ask, ask if I was all right, and I said, yeah, and, um, uh, they asked if, then they called the police.

The police came out and they decided that they didn't, I didn't know why I ran into the pole and they gave me a choice between a, a reckless driving ticket and, a, a having my doctor change my prescription or something, and, and so they gave me that and, uh, prior to the police man leaving, uh, when they got the truck started again to put it on the roll back, um, the fellow showed me that the steering wheel just spun around in circles. Well, then we knew, then I knew why I had run into the pole because I was trying to turn the truck and the truck wouldn't turn.

Q: So, the wrecker, the tow truck, uh, the wrecker driver towed told you, did he tell you that there was a problem with the steering?

A: No, it was, a, a fellow that I had called from my shop to come down, uh, and help load the truck and we had to find the im-, impact switch that cut the diesel off. So, we had to make a phone call to Beach Ford to find out where that was and when we were able to get the engine started again, found out that the steering was broken. It was just, uh, you, you spin the steering wheel, that's why I ran into the pole. It was, I was trying to make a left hand turn, but, the truck wouldn't turn.

Q: Okay, and after the vehicle got to, uh, Beach Ford, did, uh&

A: No, before the [inaudible] vehicle got to the Beach Ford, I had the vehicle taken to, um, Steve's [inaudible], a truck alignment.

Q: And there, they, uh, Nationwide had, well I think Nationwide had first sent, uh, Gary Owens down to look at the truck and he said, Mr. [REDACTED] do you know that your, uh, steering is broken? And I said, yeah, that's what caused me to run into the pole. And, um, from that point, uh, um, I, well, let's see, first of all I went to Steve Fink's [phonetic], and Steve Fink checked the steering, wheels, alignment, everything out on the truck and found that there was no leaks, no, nothing.

It was something in the gear box that had, had broken. Then the truck was taken to Beach Ford. To give Ford an opportunity to, uh, you know, to take care of it. That was under Gary Owens, um, said that we needed to give, uh, Ford a chance to do something. [Inaudible] with a letter to me from the, which I then called you and told you.

Q: Have you understood all the questions I've asked you?

A: I think so, yes.

Q: Okay, so, was this recording done with your knowledge and your consent?

A: Yes.

Q: Do I have your permission to turn off the recorder?

A: Yes.

Q: This is Alice ending the interview with Mr. [REDACTED] and the time is about 4:47 p.m. This is [inaudible] on May 19th, thank you.

[End of Recorded Statement.]











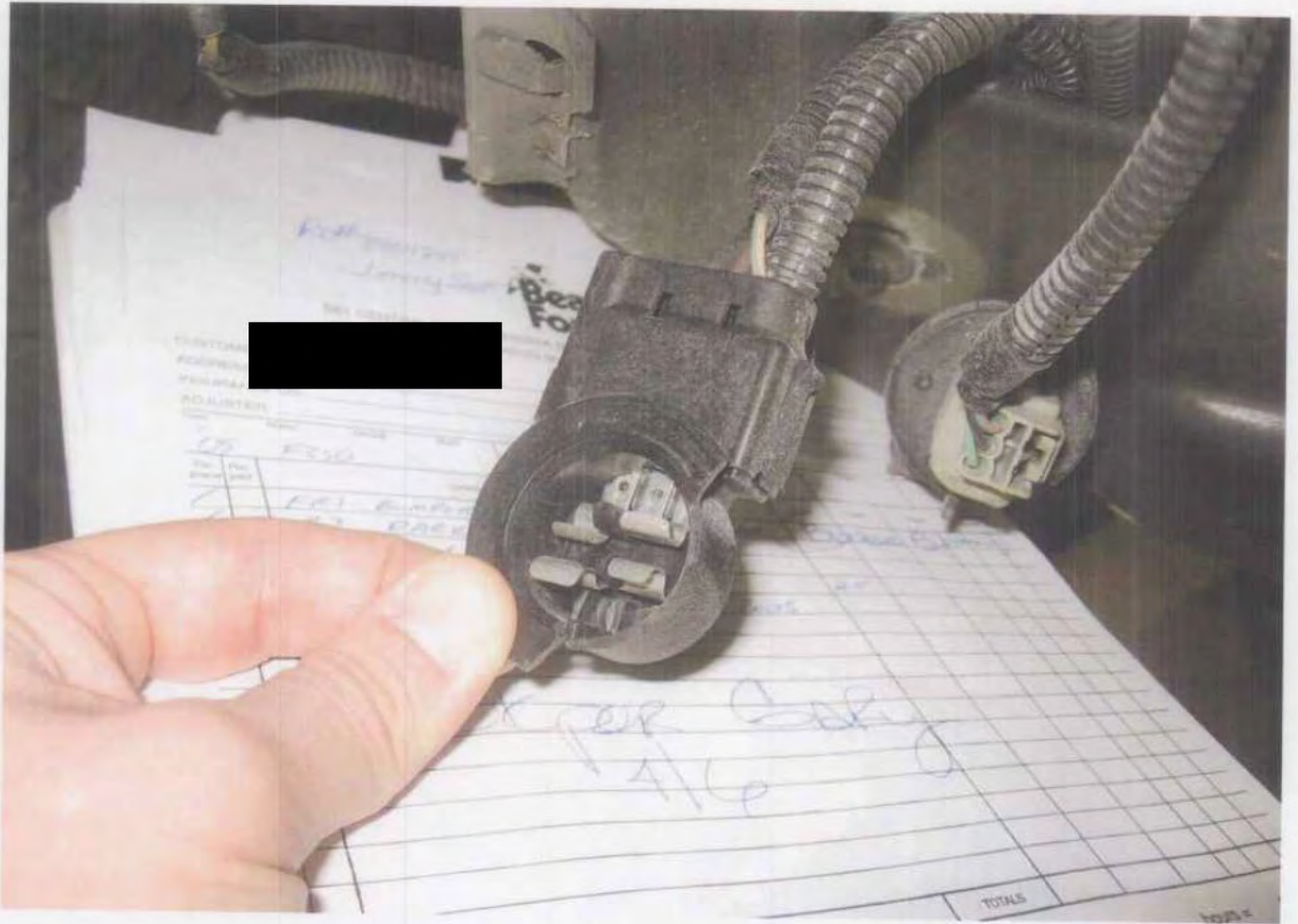








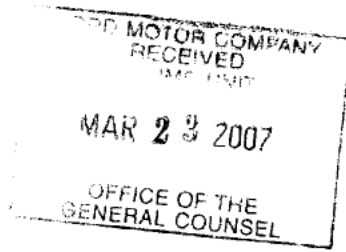












MAR 23 2007

Jm

March 19, 2007

Ford Motor Company
P.O. Box 648
Dearborn, MI 48126

Certified Mail # 7005 1820 0007 9268 7448

RE: Our Claim #: [REDACTED]
Our Insured: [REDACTED]
Date of Loss: 01/19/07
Amount: \$8,167.34

Zurich North America

Recovery Center

P.O. Box 66944
Chicago, IL
60666-0944

Fax (847) 413-5991
<http://www.zurichna.com>

Dear Sir or Madam:

Our investigation indicates that liability rests with you. Our cause and original engineer has confirmed a mechanical failure of the power steering box, thus resulting in this one vehicle accident.

After reviewing the enclosed subrogation documentation, please issue a draft in the amount of \$8,167.34.

If you have any questions, feel free to contact me. Please include our claim number on all forms of communication.

Your prompt attention to this matter will be greatly appreciated.

Very truly yours,
Zurich American Insurance Company

Nancy Carter

Nancy Carter
RECOVERY CSR
(214) 866-1628
(847) 413-5991 –fax
nancy.carter@zurichna.com

2007 MAR 23 A 9:16
CUSTOMER
RELATIONSHIP
CENTER

FATAL CMV INVOLVED SCHOOL BUS RELATED RAILROAD RELATED MEDICAL ADVISORY BOARD HIT AND RUN AMENDMENT REQUIRED

PLACE WHERE CRASH OCCURRED _____

COUNTY Johnson CITY OR TOWN _____

IF CRASH WAS OUTSIDE CITY LIMITS INDICATE FROM NEAREST TOWN 6.7 MILES N S E W OF Cleburne

LOC # _____

OR # _____

DPS # _____

ROAD ON WHICH CRASH OCCURRED CR-1228

CONSTRUCTION ZONE YES NO SPEED LIMIT 40

WORKERS PRESENT YES NO

INTERSECTING STREET OR RR CROSSING NUMBER _____

CONSTRUCTION ZONE YES NO SPEED LIMIT _____

WORKERS PRESENT YES NO

NOT AT INTERSECTION 0.5 FT. MI. N S E W OF CR-1126A

MILE POST CR LATITUDE _____

LONGITUDE _____

DATE OF CRASH _____ DAY OF WEEK Wednesday HOUR 2:21 AM PM IF EXACTLY NOON OR MIDNIGHT, SO STATE

UNIT # 1 1-MOTOR VEHICLE 4-PEDESTRIAN 7-NON-CONTACT 8-OTHER VIN 1FDWW37P36E ALTERED YES NO

YEAR MODEL 2005 COLOR & MAKE White Ford MODEL NAME F-350 BODY STYLE PU LICENSE PLATE _____ YEAR STATE NUMBER _____

DRIVER'S NAME _____ PHONE NUMBER _____

DRIVER'S LICENSE OK STATE _____ CLASS TYPE D ENDORSEMENTS _____ RESTRICTIONS _____ DATE OF BIRTH _____ LICENSE STATUS 1 1-VALID 2-NOT VALID 3-SUSPENDED/REVOKED 4-CANCELLED/DENIED 5-EXPIRED 6-UNKNOWN

DRIVER'S ETHNICITY 1 1-WHITE 2-SPANISH 3-BLACK 4-ASIAN 5-OTHER DRIVER'S SEX MALE FEMALE DRIVER'S OCCUPATION Roughneck POLICE, FIREFIGHTER, EMS ON EMERGENCY IF CHECKED, PLEASE EXPLAIN IN NARRATIVE

TYPE OF ALCOHOL SPECIMEN TAKEN 4 1-BREATH 2-BLOOD 3-URINE 4-NONE 5-REFUSED TEST RESULTS _____ TYPE OF DRUG SPECIMEN TAKEN 3 1-BLOOD 2-URINE 3-NONE 4-REFUSED TEST RESULTS _____ DRUG CATEGORY 2

LESSEE OWNER NAME (ALWAYS SHOW, LESSEE IF LEASED, OTHERWISE SHOW OWNER) Cypress, Texas ADDRESS (STREET, CITY, STATE, ZIP) _____

LIABILITY INSURANCE YES NO EXP INSURANCE COMPANY NAME Zurich American VEHICLE DAMAGE RATING 1-RD-3

UNIT # _____ 1-MOTOR VEHICLE 4-PEDESTRIAN 7-NON-CONTACT 8-OTHER VIN _____ ALTERED YES NO

YEAR MODEL _____ COLOR & MAKE _____ MODEL NAME _____ BODY STYLE _____ LICENSE PLATE _____ YEAR STATE NUMBER _____

DRIVER'S NAME _____ PHONE NUMBER _____

DRIVER'S LICENSE _____ STATE _____ NUMBER _____ CLASS TYPE _____ ENDORSEMENTS _____ RESTRICTIONS _____ DATE OF BIRTH _____ LICENSE STATUS _____ 1-VALID 2-NOT VALID 3-SUSPENDED/REVOKED 4-CANCELLED/DENIED 5-EXPIRED 6-UNKNOWN

DRIVER'S ETHNICITY _____ 1-WHITE 2-SPANISH 3-BLACK 4-ASIAN 5-OTHER DRIVER'S SEX MALE FEMALE DRIVER'S OCCUPATION _____ POLICE, FIREFIGHTER, EMS ON EMERGENCY IF CHECKED, PLEASE EXPLAIN IN NARRATIVE

TYPE OF ALCOHOL SPECIMEN TAKEN _____ TEST RESULTS _____ TYPE OF DRUG SPECIMEN TAKEN _____ TEST RESULTS _____ DRUG CATEGORY 2

LESSEE OWNER NAME (ALWAYS SHOW, LESSEE IF LEASED, OTHERWISE SHOW OWNER) _____ ADDRESS (STREET, CITY, STATE, ZIP) _____

LIABILITY INSURANCE YES NO EXP INSURANCE COMPANY NAME _____ POLICY NUMBER _____ VEHICLE DAMAGE RATING _____

DAMAGE TO PROPERTY OTHER THAN VEHICLES _____

_____ FEET FROM CURB \$ 500.00 DAMAGE ESTIMATE

IN YOUR OPINION, DID THIS CRASH RESULT IN AT LEAST \$1000.00 DAMAGE TO ANY ONE PERSON'S PROPERTY? YES NO

CHARGES FILED

NAME None CHARGE None CITATION NUMBER _____

NAME _____ CHARGE _____ CITATION NUMBER _____

TIME NOTIFIED OF CRASH 1/17/07 2:25 PM HOW JCSO TIME ARRIVED AT SCENE 1/17/07 3:13 PM DATE OF REPORT 1/22/07

TYPED OR PRINTED NAME OF INVESTIGATOR David Armstrong DLA ID # 10956 AGENCY DPS-THP DIST./ARBA 6A5 REPORT COMPLETE YES NO

FIELD COPY-NOT FROM CUSTOMER'S

1. FRONT LEFT 2. FRONT CENTER 3. FRONT RIGHT 4. SECOND SEAT LEFT 5. SECOND SEAT CENTER 6. SECOND SEAT RIGHT	7. THIRD SEAT LEFT 8. THIRD SEAT CENTER 9. THIRD SEAT RIGHT 10. CARGO AREA 11. OUTSIDE VEHICLE 12. UNKNOWN	1. NO 2. YES 3. YES, PARTIAL 4. NOT APPLICABLE 5. UNKNOWN	1. SINGLE SEAT LIFT SET 2. SHOULDER BOLT ONLY 3. LAP BELT ONLY 4. CHILD SEAT, FACING FORWARD 5. CHILD SEAT, FACING REAR 6. CHILD SEAT, LHM	7. BOOSTER SEAT 8. NONE 9. OTHER 10. UNKNOWN 11. UNKNOWN	1. NOT APPLICABLE 2. NOT BULDED 3. DEPLOYED FRONT 4. DEPLOYED SIDE 5. DEPLOYED OTHER 6. UNKNOWN	1. WORK DAMAGED 2. WORK NOT DAMAGED 3. WORK UNKNOWN 4. HOT WORK 5. UNKNOWN WORK	1. KILLED A. ANATOMICAL INJURY B. NON-FACIAL INJURY C. POSSIBLE INJURY D. NOT INJURED U. UNKNOWN
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UNIT # **1** TOWED DUE TO YES NO VEHICLE **Rick's Wrecker Service-1110 N. Main, Cleburne, Texas 76033** BY **Rick's Wrecker**

REASON FOR TOWING: DISABLING DAMAGE REMOVED TO

ITEM #	SEAT POSITION	NAME (LAST, FIRST, MI)	ADDRESS	SOL	EJECTED	RESTRAINT USED	AIRBAG	HELMET	AGE	SEX	INJURY CODE	
1	1	[REDACTED]	Cleburne, Texas		N	1	1	2	4	45	M	N
2	3	[REDACTED]	[REDACTED]		N	1	1	2	4	42	M	N
3												
4												
5												

UNIT # **1** TOWED DUE TO YES NO VEHICLE **REMOVED TO** BY

ITEM #	SEAT POSITION	NAME (LAST, FIRST, MI)	ADDRESS	SOL	EJECTED	RESTRAINT USED	AIRBAG	HELMET	AGE	SEX	INJURY CODE
6											
7											
8											
9											
10											

ITEM #	NAME (LAST, FIRST, MI)	ADDRESS	SOL	ALCOHOL SPECIMEN TAKEN	RESULT	DRUG SPECIMEN TAKEN	RESULT	HELMET	AGE	SEX	INJURY CODE

DISPOSITION OF KILLED OR INJURED

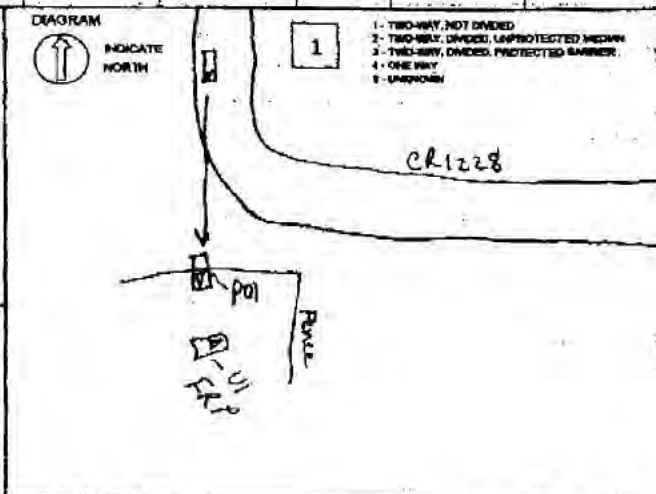
ITEM #	TAKEN TO	BY	TIME NOTIFIED	TIME ARRIVED AT SCENE	AMBULANCE UNIT #	# ATTENDANTS INC. DRIVER	# OF OCCUPANTS TREATED FOR TREATMENT

COMPLETE THIS SECTION IF PERSON KILLED

ITEM #	DATE OF DEATH	TIME OF DEATH	ITEM #	DATE OF DEATH	TIME OF DEATH	ITEM #	DATE OF DEATH	TIME OF DEATH

INVESTIGATOR'S NARRATIVE OPINION OF WHAT HAPPENED (ATTACH ADDITIONAL SHEETS IF NECESSARY)

Unit 1 was southbound on CR-1228 approaching a sharp curve when the steering mechanism in the vehicle failed to work properly. A check of the vehicle revealed that the steering wheel rotated freely and failed to turn the wheels of the truck. Due to this failure, unit 1 traveled through a fence on the south side of the road.



FACTORS AND CONDITIONS LISTED ARE THE INVESTIGATOR'S OPINION

Item #	Factor/Condition	Item #	Factor/Condition	Item #	Factor/Condition	Item #	Factor/Condition
X1	1. ABNOR ON ROAD - DOMESTIC		11. OTHER FACTOR (WRITE ON LINE)				

- VEHICLE DEFECTS
- 1. DEFECTIVE OR NO HEADLAMPS
 - 2. DEFECTIVE OR NO STOP LAMPS
 - 3. DEFECTIVE OR NO TAIL LAMPS
 - 4. DEFECTIVE OR NO TURN SIGNALS
 - 5. DEFECTIVE OR NO BRAKES
 - 6. DEFECTIVE OR NO WHEEL BRIDES
 - 7. DEFECTIVE OR NO STEERING MECH
 - 8. DEFECTIVE OR NO SLACK TIES
 - 9. DEFECTIVE TIRE CONDITION
- Other factors listed include: 1. ABNOR ON ROAD - WILD, 2. ABNOR ON ROAD - WILD, 3. ABNOR ON ROAD - WILD, 4. CHANGED LANE WITH LIGHTS, 5. EXCESS VEHICLE WEIGHT, 6. DISABLED TRAFFIC LIGHT, 7. DISOBEY STOP SIGN, 8. DISOBEY STOP SIGN, 9. DISOBEY STOP SIGN, 10. DISOBEY STOP SIGN, 11. DISOBEY STOP SIGN, 12. DISOBEY STOP SIGN, 13. DISOBEY STOP SIGN, 14. DISOBEY STOP SIGN, 15. DISOBEY STOP SIGN, 16. DISOBEY STOP SIGN, 17. DISOBEY STOP SIGN, 18. DISOBEY STOP SIGN, 19. DISOBEY STOP SIGN, 20. DISOBEY STOP SIGN, 21. DISOBEY STOP SIGN, 22. FAILED TO CONTROL SPEED, 23. FAILED TO DRIVE IN SINGLE LANE, 24. FAILED TO DRIVE IN SINGLE LANE, 25. FAILED TO DRIVE IN SINGLE LANE, 26. FAILED TO DRIVE IN SINGLE LANE, 27. FAILED TO DRIVE IN SINGLE LANE, 28. FAILED TO DRIVE IN SINGLE LANE, 29. FAILED TO DRIVE IN SINGLE LANE, 30. FAILED TO DRIVE IN SINGLE LANE, 31. FAILED TO DRIVE IN SINGLE LANE, 32. FAILED TO DRIVE IN SINGLE LANE, 33. FAILED TO DRIVE IN SINGLE LANE, 34. FAILED TO DRIVE IN SINGLE LANE, 35. FAILED TO DRIVE IN SINGLE LANE, 36. FAILED TO DRIVE IN SINGLE LANE, 37. FAILED TO DRIVE IN SINGLE LANE, 38. FAILED TO DRIVE IN SINGLE LANE, 39. FAILED TO DRIVE IN SINGLE LANE, 40. FAILED TO DRIVE IN SINGLE LANE, 41. FAILED TO DRIVE IN SINGLE LANE, 42. FAILED TO DRIVE IN SINGLE LANE, 43. FAILED TO DRIVE IN SINGLE LANE, 44. FAILED TO DRIVE IN SINGLE LANE, 45. FAILED TO DRIVE IN SINGLE LANE, 46. FAILED TO DRIVE IN SINGLE LANE, 47. FAILED TO DRIVE IN SINGLE LANE, 48. FAILED TO DRIVE IN SINGLE LANE, 49. FAILED TO DRIVE IN SINGLE LANE, 50. FAILED TO DRIVE IN SINGLE LANE, 51. FAILED TO DRIVE IN SINGLE LANE, 52. FAILED TO DRIVE IN SINGLE LANE, 53. FAILED TO DRIVE IN SINGLE LANE, 54. FAILED TO DRIVE IN SINGLE LANE, 55. FAILED TO DRIVE IN SINGLE LANE, 56. FAILED TO DRIVE IN SINGLE LANE, 57. FAILED TO DRIVE IN SINGLE LANE, 58. FAILED TO DRIVE IN SINGLE LANE, 59. FAILED TO DRIVE IN SINGLE LANE, 60. FAILED TO DRIVE IN SINGLE LANE, 61. FAILED TO DRIVE IN SINGLE LANE, 62. FAILED TO DRIVE IN SINGLE LANE, 63. FAILED TO DRIVE IN SINGLE LANE, 64. FAILED TO DRIVE IN SINGLE LANE, 65. FAILED TO DRIVE IN SINGLE LANE, 66. FAILED TO DRIVE IN SINGLE LANE, 67. FAILED TO DRIVE IN SINGLE LANE, 68. FAILED TO DRIVE IN SINGLE LANE, 69. FAILED TO DRIVE IN SINGLE LANE, 70. FAILED TO DRIVE IN SINGLE LANE, 71. FAILED TO DRIVE IN SINGLE LANE, 72. FAILED TO DRIVE IN SINGLE LANE, 73. FAILED TO DRIVE IN SINGLE LANE, 74. FAILED TO DRIVE IN SINGLE LANE, 75. FAILED TO DRIVE IN SINGLE LANE, 76. FAILED TO DRIVE IN SINGLE LANE, 77. FAILED TO DRIVE IN SINGLE LANE, 78. FAILED TO DRIVE IN SINGLE LANE, 79. FAILED TO DRIVE IN SINGLE LANE, 80. FAILED TO DRIVE IN SINGLE LANE, 81. FAILED TO DRIVE IN SINGLE LANE, 82. FAILED TO DRIVE IN SINGLE LANE, 83. FAILED TO DRIVE IN SINGLE LANE, 84. FAILED TO DRIVE IN SINGLE LANE, 85. FAILED TO DRIVE IN SINGLE LANE, 86. FAILED TO DRIVE IN SINGLE LANE, 87. FAILED TO DRIVE IN SINGLE LANE, 88. FAILED TO DRIVE IN SINGLE LANE, 89. FAILED TO DRIVE IN SINGLE LANE, 90. FAILED TO DRIVE IN SINGLE LANE, 91. FAILED TO DRIVE IN SINGLE LANE, 92. FAILED TO DRIVE IN SINGLE LANE, 93. FAILED TO DRIVE IN SINGLE LANE, 94. FAILED TO DRIVE IN SINGLE LANE, 95. FAILED TO DRIVE IN SINGLE LANE, 96. FAILED TO DRIVE IN SINGLE LANE, 97. FAILED TO DRIVE IN SINGLE LANE, 98. FAILED TO DRIVE IN SINGLE LANE, 99. FAILED TO DRIVE IN SINGLE LANE, 100. FAILED TO DRIVE IN SINGLE LANE.

TRAFFIC CONTROL	ROADWAY RELATION
1. NONE 2. INTERMEDIATE 3. OTHER 4. FLASHING 5. SIGNAL LIGHT 6. FLASHING YELLOW LIGHT	1. ONE-WAY 2. OFF-RAMP 3. SPLITTER 4. OTHER
PART OF ROADWAY	ROADWAY ALIGNMENT
1. MAIN LANE 2. SERVICE ROAD 3. SERVICE RAMP 4. FURTHER 5. CONNECTOR 6. OTHER	1. STRAIGHT GRADE 2. STRAIGHT HILLSIDE 3. CURVE LEVEL 4. CURVE GRADE 5. CURVE HILLSIDE 6. OTHER
TYPE OF ROAD SURFACE	WEATHER
1. CONCRETE 2. BLACKTOP 3. GRAVEL 4. GRAVEL	1. CLEAR/DRY 2. RAIN 3. SLEET/ICE 4. SNOW 5. FOG 6. BLIZZARD/DRIZZLE
	SURFACE CONDITION
	1. DRY 2. WET 3. STANDING WATER 4. SLUSH 5. ICE

Recorded Statement of [REDACTED]

LM: This is Lisa Martins speaking from Zurich North America, claim number [REDACTED]. I'm speaking with [REDACTED] regarding an incident that occurred on [REDACTED]. Mr. [REDACTED], can you spell your, can you state and spell your name?

DB: [REDACTED]

LM: And can you tell me, ah, can you tell me the time of the accident and the weather and everything?

DB: Ah, the weather, it was clear, partly clear, partly cloudy.

LM: Okay.

DB: The road condition was, ah, wet, ah, some slush.

LM: Okay.

DB: And what else did you ask me?

LM: Ah, the time of day?

DB: Oh, the time of day, ah, it was at, ah, I think it was ten 'til one.

LM: Okay, alright, and then what was the year, make and model of the vehicle you were driving?

DB: Ah, lord I don't even know. It was a 2000, ah, lord, I don't even know. It was a 2000, it was a Ford. I don't know what it was. It was a Ford, ah, flatbed.

LM: Okay.

DB: I guess a one-ton, crew cab, ah, ah.

LM: Okay.

DB: I think it was 2006, almost positive it was a 2006.

LM: Alright, and who's the owner of the truck?

DB: Ah, Salt Services Incorporated.

LM: Alright, did you have any passengers with you?

DB: Yes, I had one passenger.

Recorded Statement of [REDACTED]
[REDACTED]

LM: And can you tell me the location of the accident?

DB: Ah, Norwood, ah, no I don't know what county road it was on. It's in the, ah Dundee, Clearborne area, but I don't know what county road.

LM: Okay, that's fine. Were any other vehicles involved in the accident?

DB: No there was not.

LM: Can you tell me what happened and what lead up to the accident?

DB: Um, what happened, ah, I just came from lunch going back to location, ah, we were approaching a road we have traveled many times, but there's a, we are approaching a ninety degree turn in the road. Ah, before we got to that ninety, probably, oh, I'd say 100 feet, anywhere from eighty to a hundred feet, my steering wheel locked and I jerked on the steering wheel. Ah, it's a real bumpy road so I mean your steering wheel is constantly moving one way or another just a little bit.

LM: Uh-huh.

DB: So I knew it was locked. It wouldn't do anything and I jerked it and felt a pop and I, after that I had no control of the vehicle. The steering wheel was just frozen. It just wouldn't turn either way and I yelled out, "Hang on, we're not going to make the turn", I put my brakes on, I threw my brakes on, and just started sliding back in, we were on slush apparently, we started sliding a little bit so I let go of the brake and said, "I can't do anything, hang on", and at that time my partner braced himself and, ah, the curve, we, it's kind of slope or embankment on the right side.

LM: Uh-huh.

DB: So we were kind of traveling, ah, down, I can't explain this very well. I could show it, but, ah, the wheel did turn slightly, but that was because the grade not because of anything I could do.

LM: Okay.

DB: And we hit the ninety probably at a, I'm guessing, like a forty-five degree angle.

LM: Okay.

DB: At that point and the tires dug into the dirt off of the road and it kind of jumped and then the truck turned basically sideways and hit a fence sideways.

LM: Okay.

DB: So, ah, that's basically what happened.

LM: Alright, how often have you driven this truck?

DB: Ah, I've been on this job since the 12th of December, if I'm not mistaken, the 12th of December.

LM: Now did you drive that pick up all the time or?

DB: Every day.

LM: Okay.

DB: Yeah, six, sometimes seven days a week.

LM: Had you ever had any problems with this particular truck?

DB: Yes, ah, there's certain roads, it didn't happen on the time, there's four or five roads down here that, though they've kind of got, not really bumps, kind of bumps, indentations or something, there's certain roads, if you hit them just right, the front end would want to jump and jerk and, ah, I inquired about, at one point, you had to slow down, you had to hit the brake and slow down before it actually would, um, would do anything.

LM: Okay.

DB: You know, before you can regain your composure with the truck and, um, the stabilizer bar was replaced prior to this accident, about two weeks, a week and a half prior to this accident.

LM: Okay.

DB: So, ah, I mean, that's the only trouble we had. Surely nothing where the steering would lock up.

LM: When the stabilizer bar was replaced, did you have that done at a dealership under warranty or did somebody else do it?

DB: Um, our maintenance mechanic, ah, put it on.

LM: Okay.

DB: He did not take it in to the shop, ah, we were working six days a week and there was not another truck and we were working twelve hours a day so the only way he could replace it was, ah, to replace it himself.

Recorded Statement of [REDACTED]

LM: Okay, do you know if this truck had had, ah, any warranty repairs or, ah, any recalls done on it?

DB: I honestly do not know.

LM: Okay.

DB: After the accident there was one thing I would like to mention. I don't know if it is relevant or not, it may be, but, ah, we looked for any type of fluid. There was no fluid any where around on the ground nowhere.

LM: Okay.

DB: And, um, but once they pulled it out, ah, we pulled it out, the tires had dug in the mud so we had to, you know, have the truck pull us out backwards, there was still no fluid. When they put it on the tow truck and raised it up, then fluid came out of the gearbox. I'm assuming the gearbox, something.

LM: Okay.

DB: So at that point we saw the fluid. Up until that point though, there was no fluid or anything on the ground.

LM: Uh-huh.

DB: There were several witnesses to, you know, even the, um, highway patrolman looked around.

LM: Alright, so the fluid came out on the tow truck?

DB: Pardon?

LM: The fluid came out on the tow truck?

DB: Yes, it came out when the tow truck actually raised the truck up to tow it off, that's when, there must have been some type of crack or something at that point. That's the only time, ah, fluid showed, when the (*unintelligible*) about three feet, two to three feet off the ground.

LM: Okay, well, I guess I'm going to go ahead and conclude this statement. Um, was anyone hurt in the accident?

DB: No, no one was hurt.

LM: Was...

DB: We wasn't going fast so.

Recorded Statement of [REDACTED]

- LM: Okay, were there any witnesses that stopped and helped you guys?
- DB: Witnesses?
- LM: Uh-huh.
- DB: No, well, there was a man that I worked for, ah, he works at [REDACTED]
His name is [REDACTED]
- LM: Okay.
- DB: Ah, he was behind and when he came up, walked up to me, he said, "Man, all I know, I said to myself, he ain't turning, he ain't turning", you know, and that's what he verbalized out to me and my partner, ah, and the highway patrolman.
- LM: Yeah, okay.
- DB: So.
- LM: And you said the police came out to the scene. Did they write an accident report?
- DB: Yes, the highway patrolman did write an accident report.
- LM: Okay, and did...
- DB: And he also did get in the truck and try the steering and all it done was just, you know, the steering wheel was just kept moving like it was broke.
- LM: Okay.
- DB: And, ah, he said, "It's been a long time since I've seen something like this", so.
- LM: Okay, well, at this time we'll go ahead and, ah, end the statement. Have you understood all of my questions?
- DB: Yes I have.
- LM: Have all of your answers been true and correct to the best of your knowledge?
- DB: They certainly have.
- LM: Okay, and with your permission I'll turn off the recording.
- DB: Okay.

Recorded Statement of [REDACTED]

Certificate of Accuracy

This is to state that I, Lorraine Budden, transcribed the foregoing recorded statement and completed it on June 3, 2007 and have herein rendered a complete and accurate transcription of the auditory contents of the recorded statement to the best of my ability.

Server Name : AWS Production- Claims loaded through 18-JUL-2007

STANDARD CLAIMS LIST

AWS Online Report

Run Date: 20-JUL-2007

Note: All Costs are in US Dollars Server Name: AWS Production- Claims loaded through 18-JUL-2007

VIN	AWS VL	WERS VL	MKT DER	BODY CAB	VER SERIES	DRIVE TYPE	PLANT CD	TRANS CD	ENG COD	PROD DATE	WARR DATE	SELLING DEALER	SELL CNT	TIS	WCC	PREF	BASE	SU	
IFDWW37P361 [REDACTED]	F7		T/F7	F	T/BC	T/CD	T/E	A1	T/BE	T/YB	22-10-05	15-02-06	152408	USA	12	5N01	6C3Z	3A131 E	
AWS Claim Key:	3282018	Doc #: 16106806	Trx Code:	E84	Labor Hrs: 3.1	Labor Cost:	239.87	Material Cost: 348.57	To Co										
Dlr Cd-Sub Cd:	09554-*	Name: LIBERTY FORD	Ph:	817-5589998	St: TX	Ctry Cd:	USA	Reg Cd:	NA	Repr Date: 18-JA									
Cust Comments:	CK FRONT END LOOSE																		
Tech Comments:	REPLACED INNER TIE ROD, LF AND RF OUTER TIE RODS AND DRAG LINK AND LEAKING STEERING DAMPER. PERFORM																		
<hr/>																			
IFDWW37P361 [REDACTED]	F7		T/F7	F	T/BC	T/CD	T/E	A1	T/BE	T/YB	22-10-05	15-02-06	152408	USA	16	7C01	5C3Z	11654 AA	
AWS Claim Key:	3733873	Doc #: 16506801	Trx Code:	E83	Labor Hrs: .5	Labor Cost:	38.69	Material Cost: 39.13	To Co										
Dlr Cd-Sub Cd:	09554-*	Name: LIBERTY FORD	Ph:	817-5589998	St: TX	Ctry Cd:	USA	Reg Cd:	NA	Repr Date: 24-Mz 2007									
Cust Comments:	CK NO DASH LIGHTS																		
Tech Comments:	CHECK DASH LAMP CIRCUIT REPLACE HEADLAMP SWITCH DASH LAMPS INOP																		
<hr/>																			
IFDWW37P361 [REDACTED]	F7		T/F7	F	T/BC	T/CD	T/E	A1	T/BE	T/YB	22-10-05	15-02-06	152408	USA	16	7L01	4C3Z	13832 AA	
AWS Claim Key:	3733872	Doc #: 16506802	Trx Code:	E83	Labor Hrs: .8	Labor Cost:	61.9	Material Cost: 34.93	To Co										
Dlr Cd-Sub Cd:	09554-*	Name: LIBERTY FORD	Ph:	817-5589998	St: TX	Ctry Cd:	USA	Reg Cd:	NA	Repr Date: 24-Mz 2007									
Cust Comments:	CK HORNS INOP																		
Tech Comments:	INSTALL HORNS GONE																		

Any comments? You can contact



webmaster

Claim Detail Report

Note: All costs are in US dollars

Model Year = 2006; Claim Key = 3282018

Vehicle Information

Model Year: 2006
 Market Derived: F - FORD
 Body/Cab Type: T/BC - DOUBLE CAB (CREW CAB)
 Version/Series: T/CD-350 SERIES
 Drive Type: T/E-4 WHL L/H PART TIME DRIVE
 Vehicle Line: T/F7-F250HD/350/450/550 [99-08]
 Warranty Start Date: 15-FEB-2006
 Production Date: 22-OCT-2005
 VIN: 1FDWW37P36H [REDACTED]

Claim Information

Document Number: [REDACTED]
 Repair Date: 18-JAN-2007
 Distance: 28571
 TIS: 12

Dealer Information:

Dealer Name LIBERTY FORD
Dealer Code: 09554 - *
Address: 3800 NORTH MAIN
City: CLEBURNE
State: TX Zip Code: 76033
Country: USA Region Code: NA
Phone: (817)558-9998

Expense Information

Customer Paid Amount: 0
Deductible Amount: 0
Dealer Paid Amount: 0
Labor Cost: 239.87
Misc. Expense Amount: 0
Part Markup Amount: 99.59
Material Cost: 348.57
Total Cost Gross: 588.44

Cust. Concern Code: H21 - STEERING HAS EXCESSIVE FREE PLAY/WANDER

Condition Code: 33 - LOOSE PART

Technician Comment: REPLACED INNER TIE ROD, LF AND RF OUTER TIE RODS AND DRAG LINK AND LEAKING STEERING DAMPER. PERFORM ALIGNMENT

Customer Comment: CK FRONT END LOOSE

<u>Labor Op Code</u>	<u>Labor Op Description</u>	<u>Labor Op Cost</u>
3130AC	END ASSEMBLY (SPINDLE CONNECTING ROD) AND OR LINK REPLACE	100.59
3001A	CASTER, CAMBER, TOE-IN CHECK	30.95
3001A1T	CASTER, CAMBER AND TOE-IN CORRECT	108.33

<u>Causal Flag</u>	<u>Full Part Number</u>	<u>Part Description</u>	<u>Part CPSC</u>	<u>Extended Quantity</u>	<u>Amount</u>
--------------------	-------------------------	-------------------------	------------------	--------------------------	---------------

Y	6C3Z	3A131	E	KIT SPINDLE CON ROD	110301	1	75.03
N	6C3Z	3A131	D	KIT SPINDLE CON ROD	110301	1	40.33
N	6C3Z	3304	B	ROD ASY-STR ARM TO I	110301	1	114.23
N	5C3Z	3E651	D	ABSORBER-STEERING SH	110301	1	29.25
N	*	N800594	S100		110301	4	6.16
N	*	N811880	S100		110301	4	7.06
N	7C3Z	3A131	H	KIT SPINDLE CON ROD	110301	1	56.42
N	2C2Z	1107	AA	HUB BOLT	060301	1	13.82
N	2C2Z	1012	AA	WHEEL LUG NUT	0502XX	1	6.27

DTC Sections: MIL. Light ON = *

Flag Test Type Malfunction Cd Malfunction Cd Description Monitor Cd Monitor Cd Description

Any comments? You can contact



webmaster

February 21, 2007

Ms. Lisa Martin
Zurich Insurance
P.O. Box 610787
Dallas, TX 75261

Insured: [REDACTED]
Claim #: [REDACTED]
Our File #: [REDACTED]

Dear Ms. Martin:

This report represents the findings of Goodson Engineering in the examination of a vehicle with a reported steering gear failure.

Background Information:

On January 18th 2007, a 2006 Ford F350 flat bed truck belonging to the insured, Chalk Services, failed to navigate a curve and wrecked into a ditch. It was reported that the steering wheel on the vehicle locked as the driver was approaching the curve. Allegedly, the driver jerked the steering wheel when it locked and as a result was able to loosen the steering wheel but with no response from the front wheels. Subsequently, the vehicle went off the road and into a ditch. It was reported that at the accident scene the officer noted the steering wheel spun freely with no response from the front wheels. Prior to the accident, November 1st 2006, the truck was taken to Liberty Ford in Cleburne, TX because of complaints of a loose front end. During this service inspection the front tires were replaced and the dealership noted that the tire rods, steering damper, and drag link were worn and recommended they be replaced. These parts were ordered but the truck had not been brought back to the dealership to complete the service prior to the accident. This is extent of details we know concerning the history of the vehicle.

Findings:

On February 19th 2007 the undersigned inspected the vehicle at the Liberty Ford dealership (See Photo Log). The vehicle was a 4 door Ford F350 XL Super Duty,

VIN #1FDWW37P36E [REDACTED] The date of manufacture was October 2005 and the mileage on the vehicle was 28571. The steering gear box, a recirculating ball design, had been removed and replaced by the dealership (See Photo Log). It appeared that the original pitman arm had been reinstalled on the new gear box. The intermediate steering shaft connecting the steering wheel to the input stub shaft of the gear box appeared original and in good condition. The tie rod, drag link, and damper on the steering system had also been replaced. The upper and lower ball joints on the front two wheels also appeared original and in good condition. There was no notable damage to the frame of the truck.

There was visible damage to the passenger side of the vehicle. The passenger side headlight cover had been broken and front fender had a dent in it. The most severe body damaged was on the front passenger side door and door jam. A large dent was noted in the front passenger door and the rear passenger door had been pushed back.

The dealership had retained the old steering gear box. The gear box had no apparent damage to the exterior. The teeth on the input stub shaft were in good condition, there was no sign of excessive wear. The input stub shaft could be rotated fairly easily by hand and the output pitman shaft did not respond to the rotation. The gear box was not opened in order to preserve its state, however, inspection of the power steering fluid ports revealed internal damage (See Photo Log).

Service records from the dealership were retained at the time of inspection. The old tie rods, damper, and drag link were not retained by the dealer and were unable to be inspected by the undersigned.

Discussion:

It is apparent the gear box has failed. The stub input shaft on the steering gear box is no longer communicating with the output pitman shaft of the box. It is not clear what caused the failure internal to the gear box. To determine the cause of failure would require destructive examination of the box itself. Without determining the cause of failure internal to the box it is unclear what role the reportedly worn drag link, tie rods, and damper played in the failure of the gear box. Since the damage to the box is internal the end user would have no access to it unless he/she were to tamper with it. It does not appear that the gear box has been tampered with. If this claim were to be further pursued the parties responsible for the manufacture of the gear box should be notified of the intent of destructive examination.


Conclusion:

A Ford F350 XL Super Duty that had reportedly wrecked as a result of a failed power steering gear was inspected to determine the cause of failure. At the time of inspection the gear box had been replaced on the vehicle along with the tie rods, damper, and drag link. Examination of the gear box revealed a failure

internal to the box. It is unclear what role the reportedly worn drag link, tie rods, and damper played in the failure of the gear box without destructively examining the box. If this claim is to be further pursued the parties responsible for the manufacture of the gear box should be notified of the intent of destructive examination.

Respectfully submitted,
Goodson Engineering

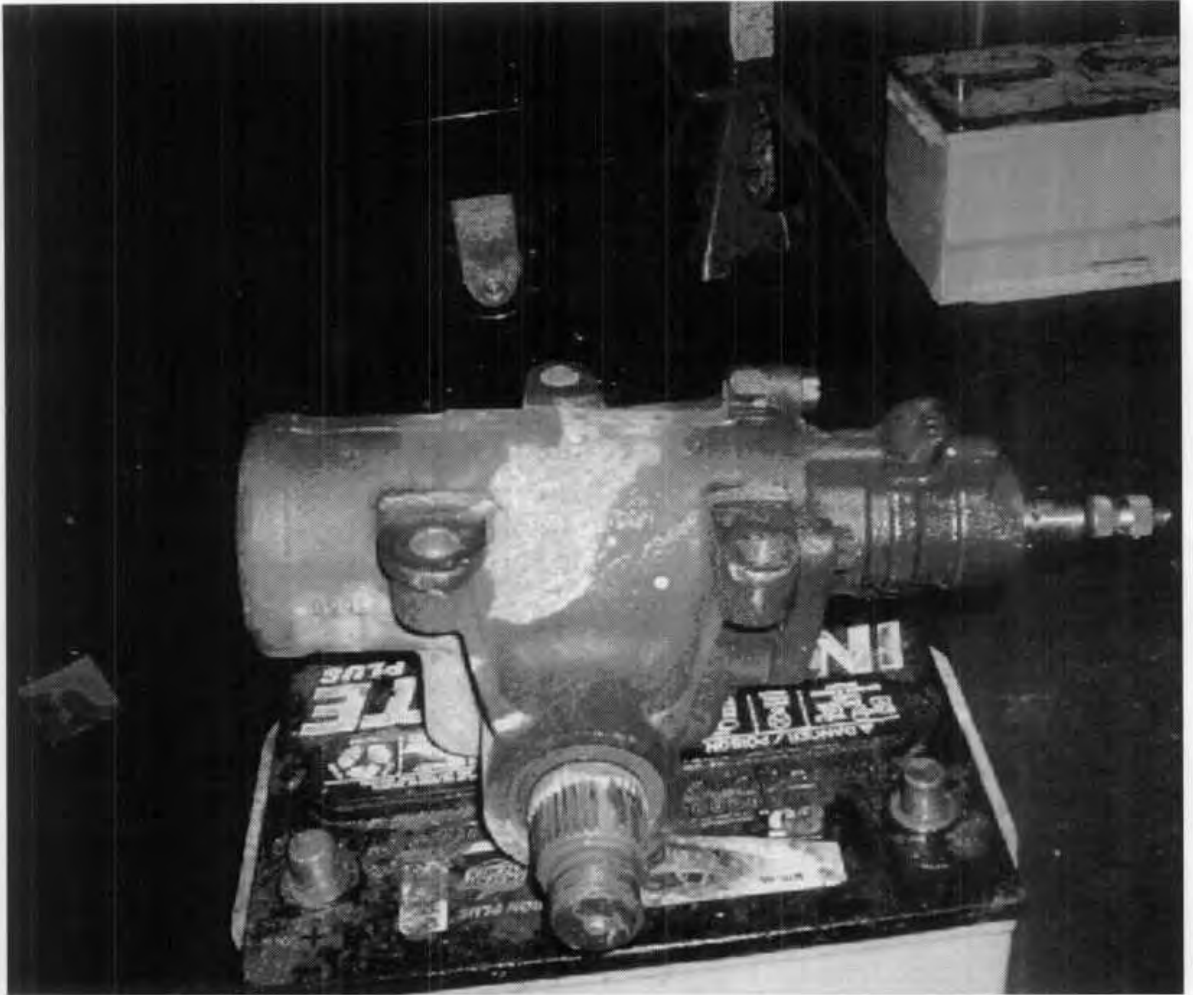

Mark E. Hergenrether
Consulting Engineer


William G. Stanfield
Professional Engineer

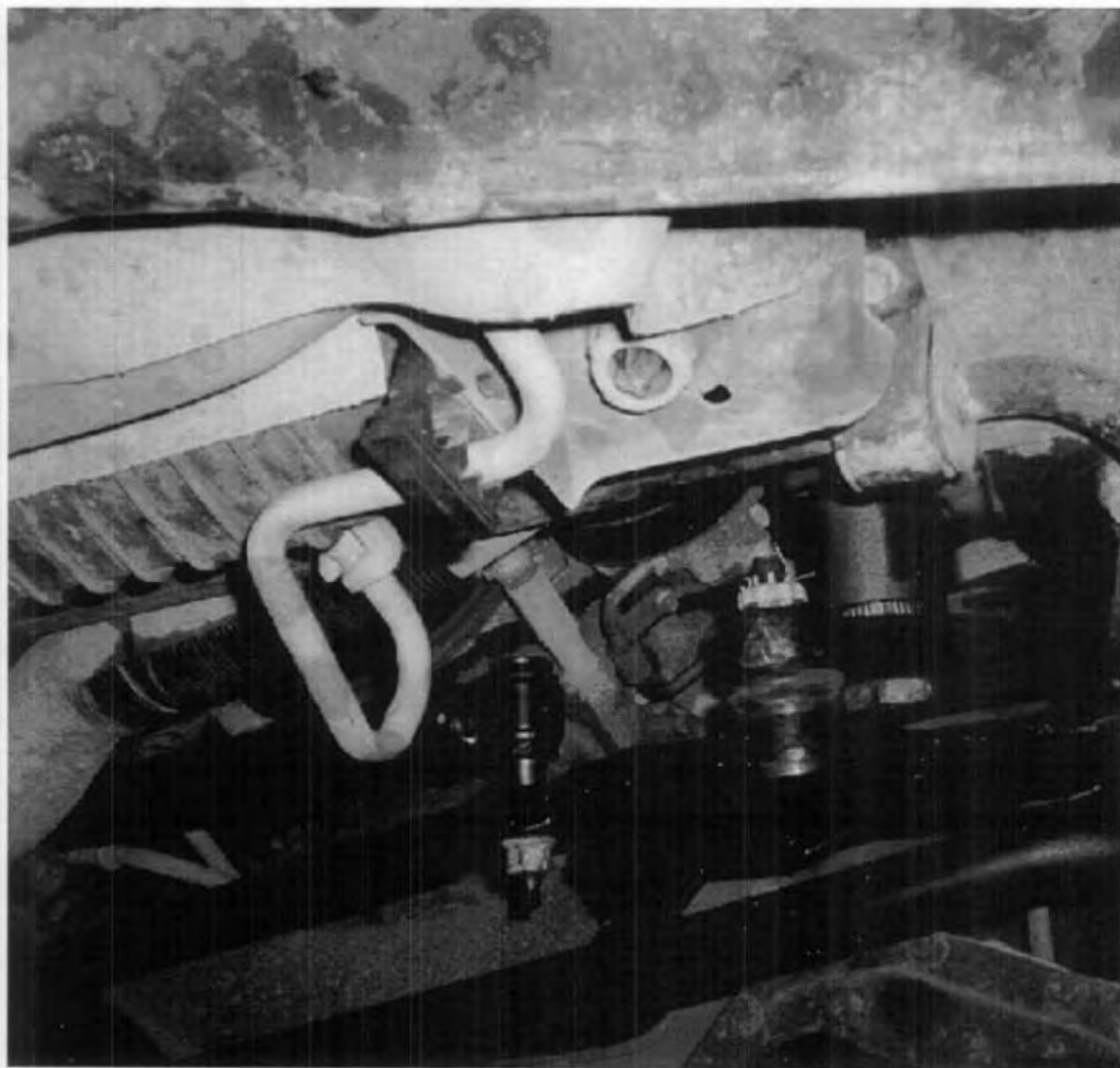
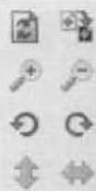


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Claim Reference ID

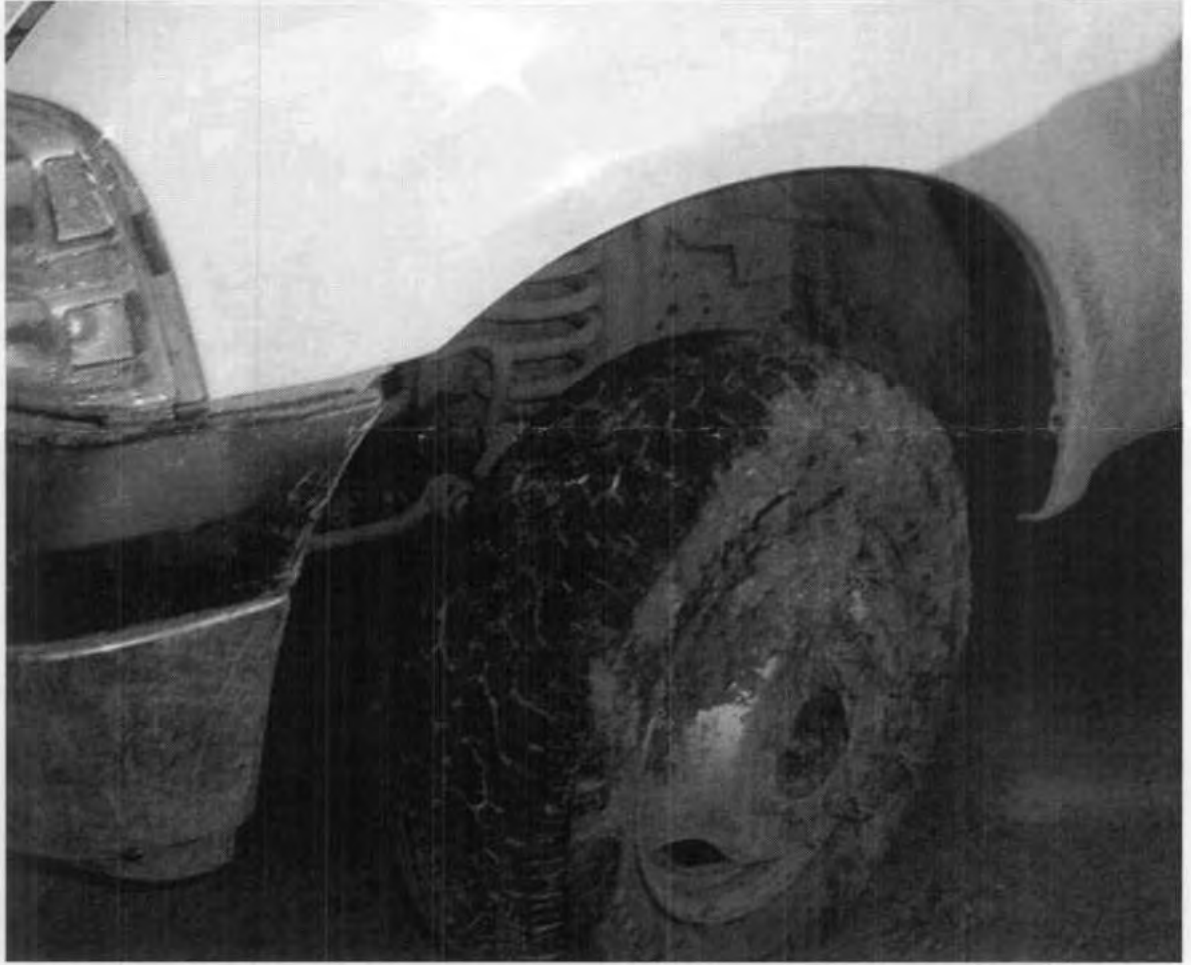


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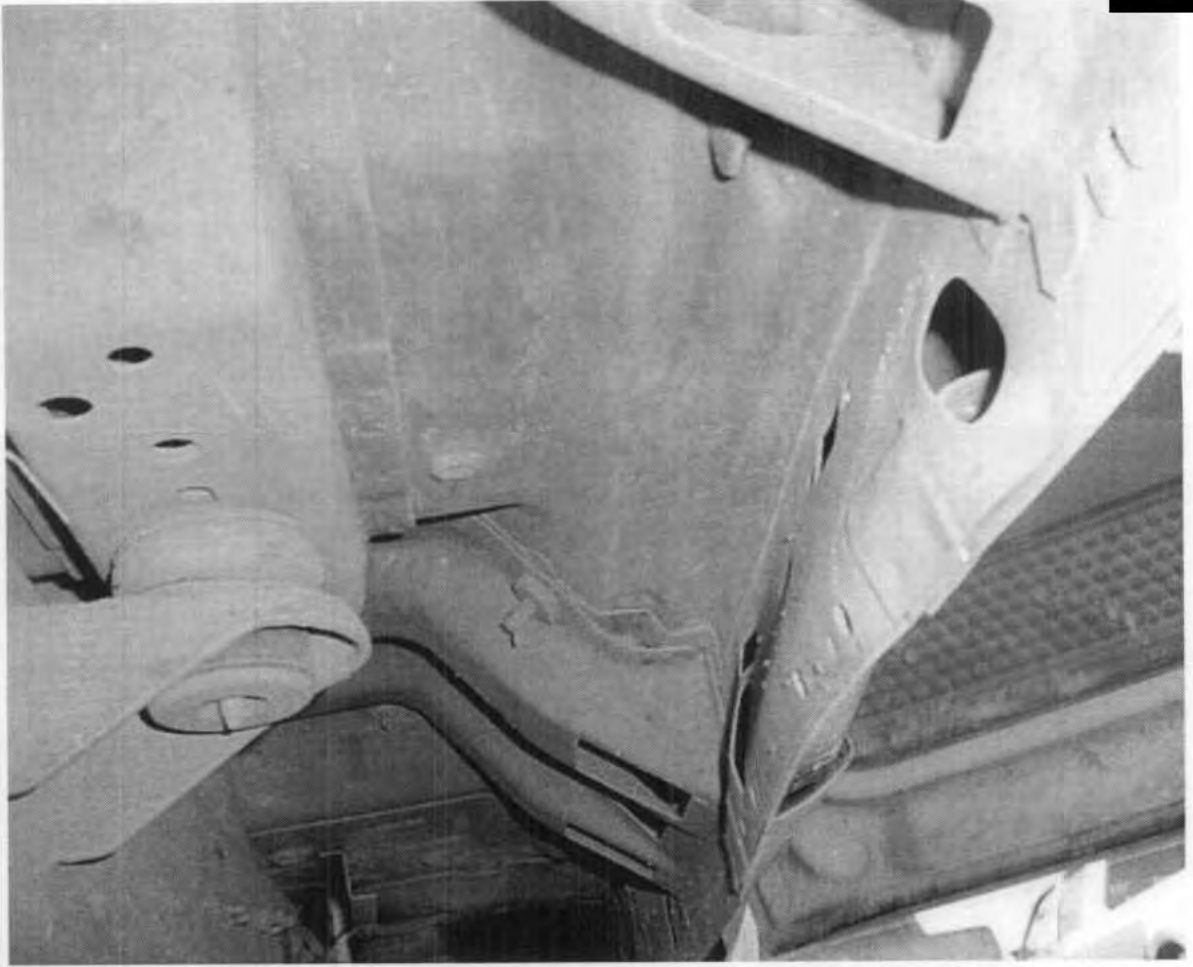
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Claim Reference ID: [REDACTED]



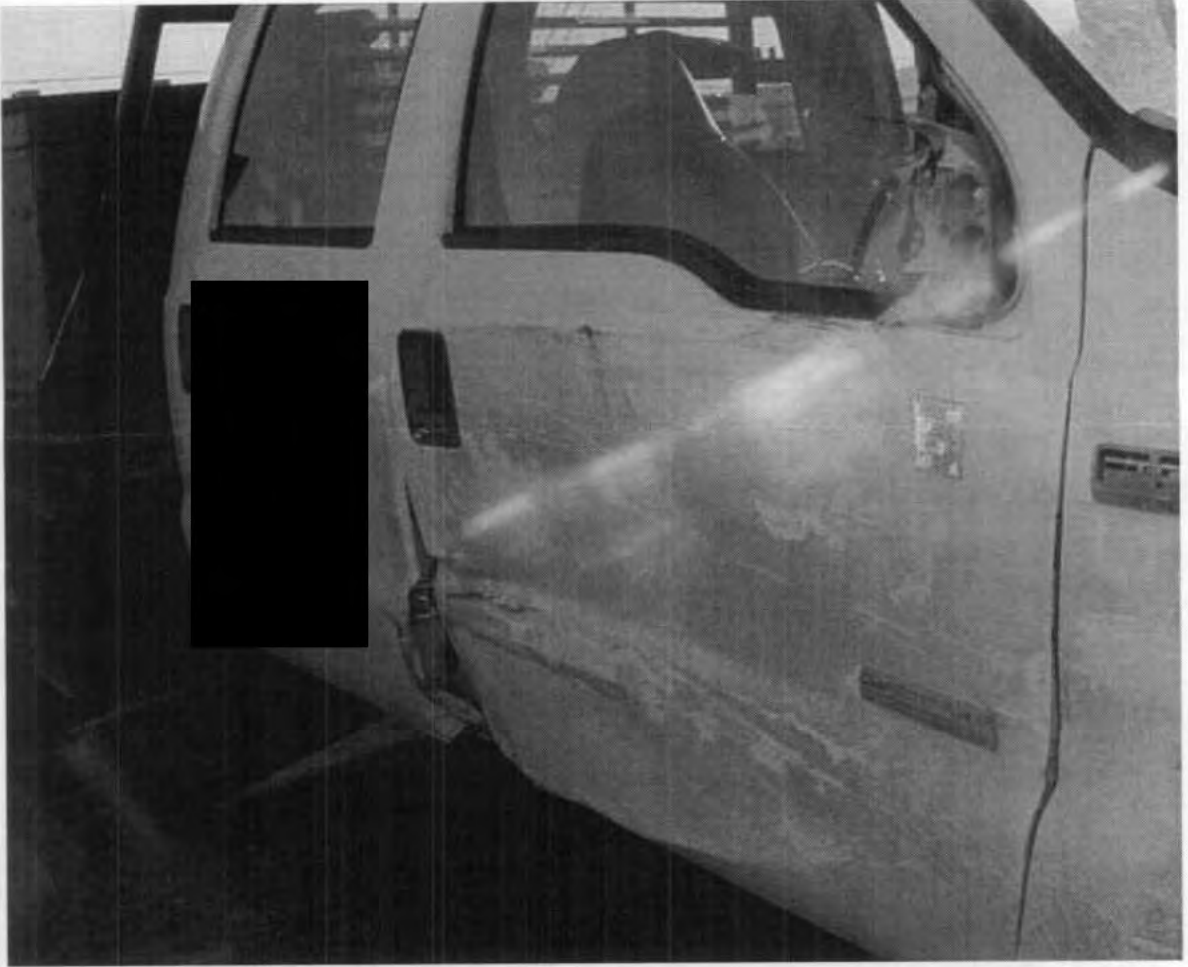
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Claim Reference ID: [REDACTED]



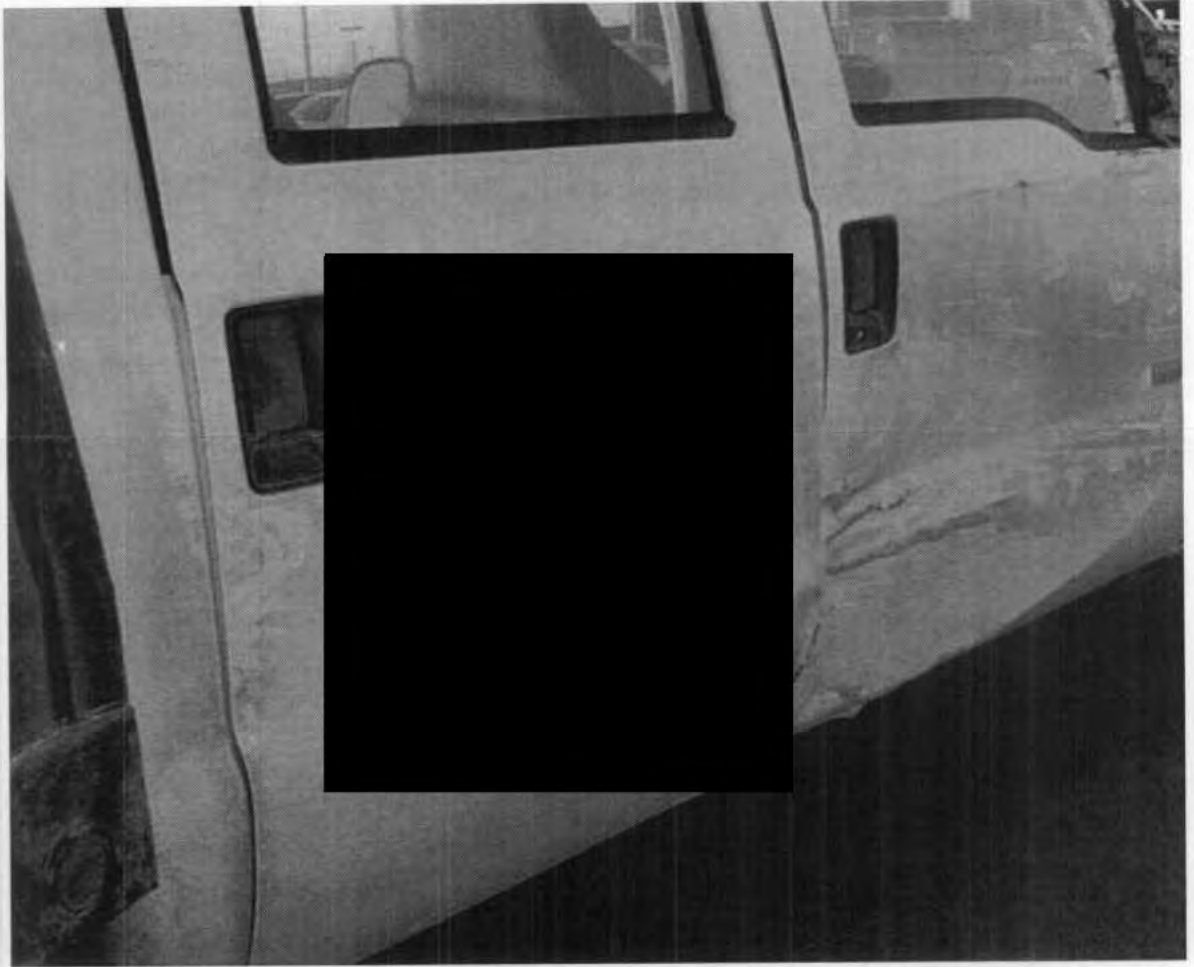
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Claim Reference ID: [REDACTED]



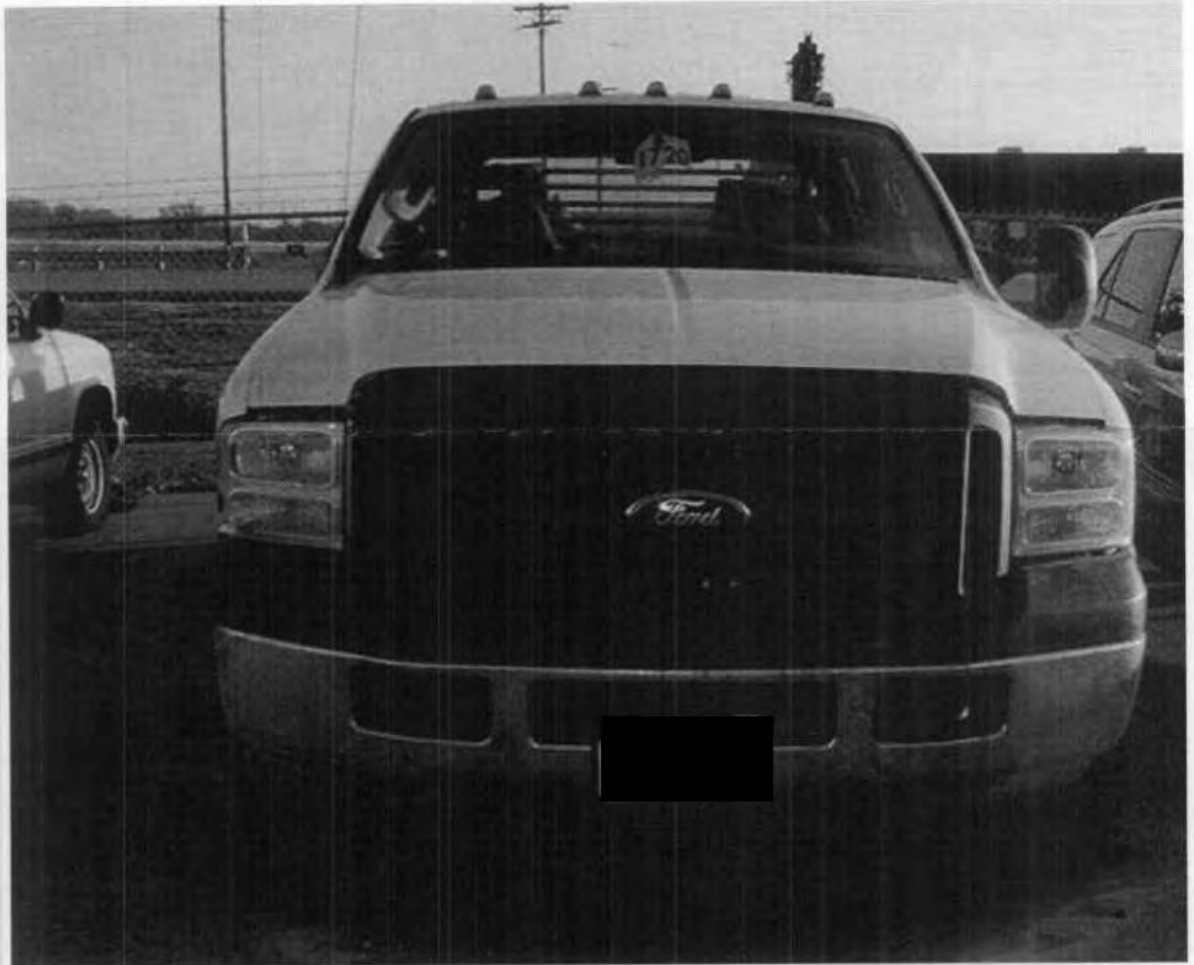
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Claim Reference ID: [REDACTED]



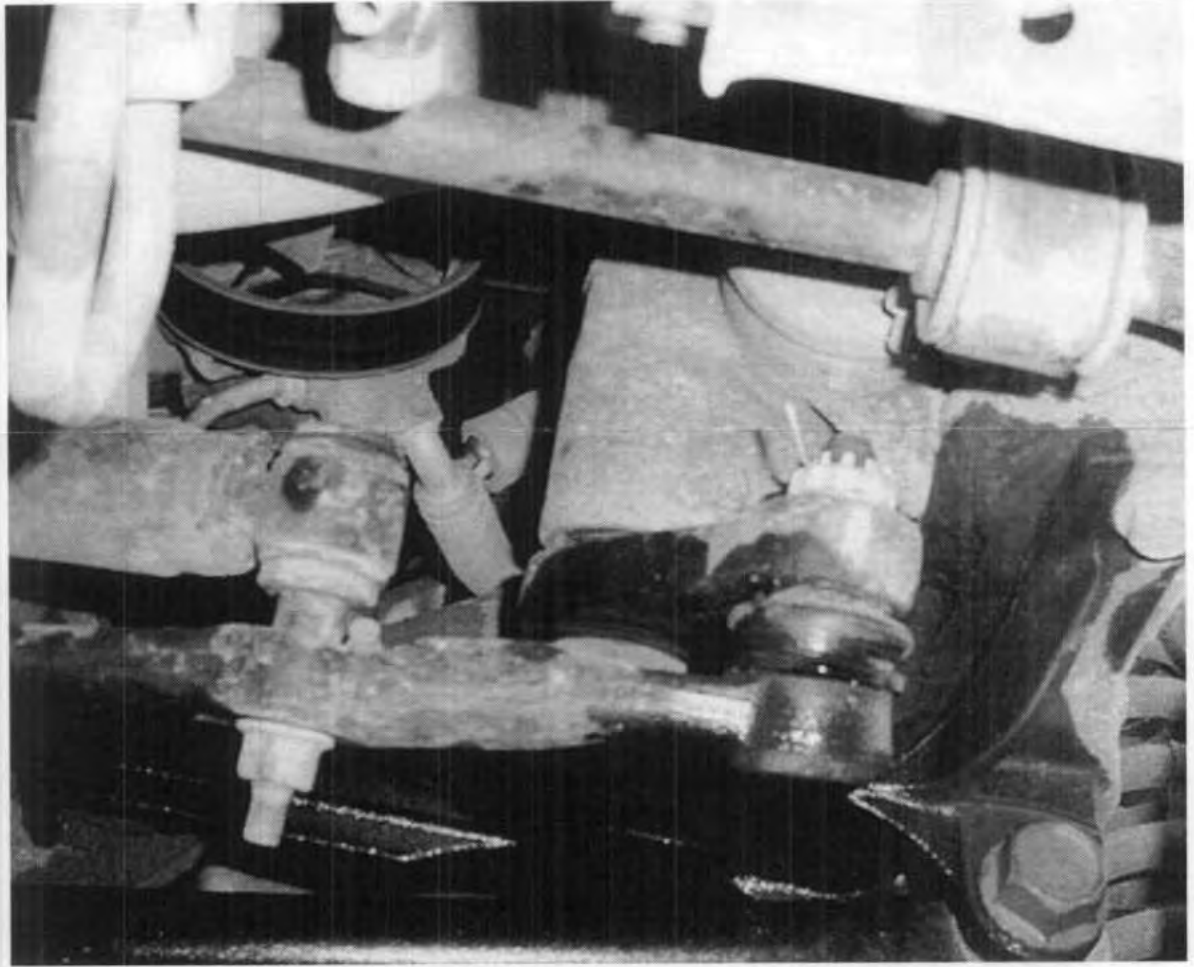
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Claim Reference ID [REDACTED]



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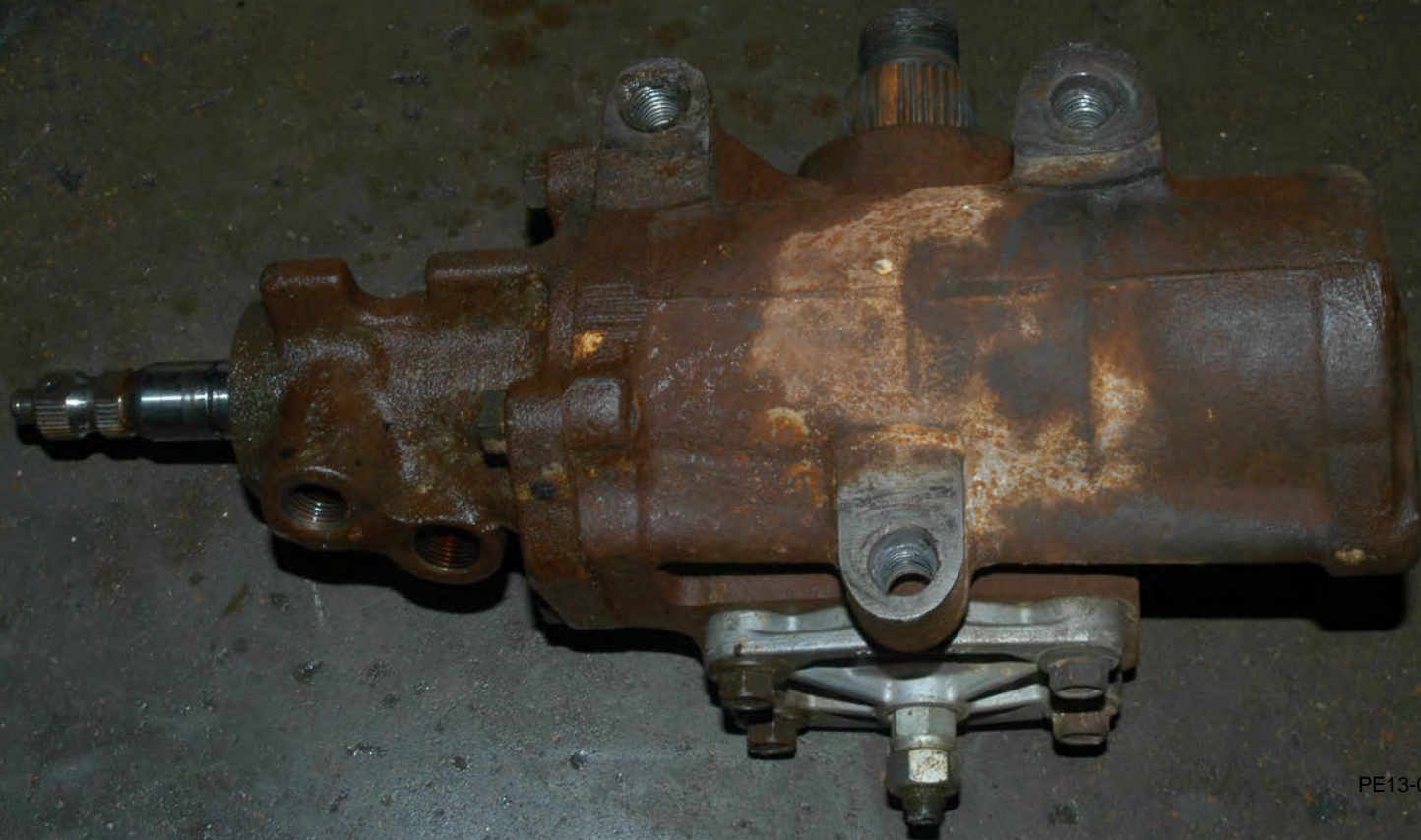
Claim Reference ID [REDACTED]



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PE13-014 000070LCPV



PE13-014 000071LCPV



PE13-014 000072 CPV



MTP-65



MOTOR-IRON-FLU

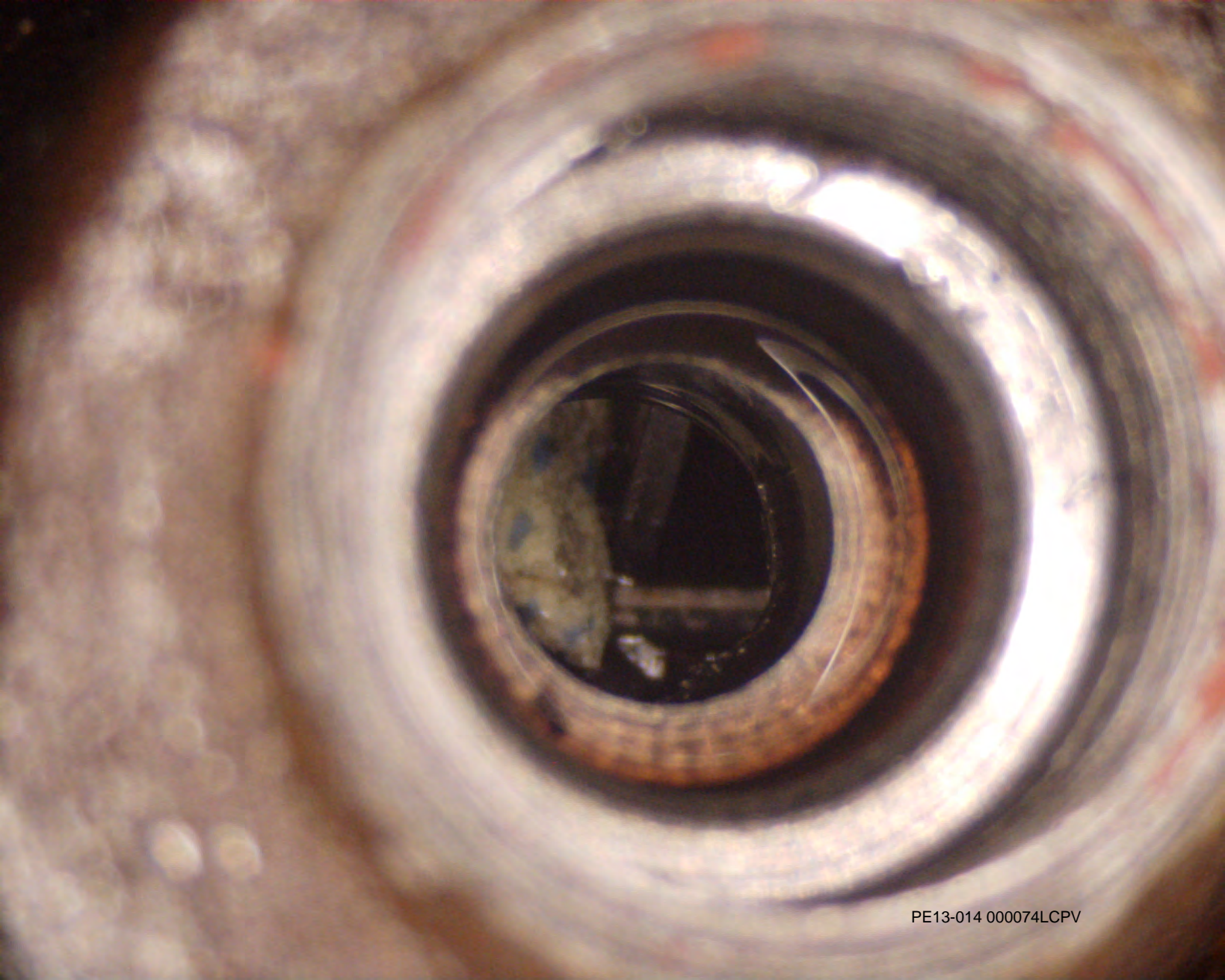


8

AG

10A

KEEP OUT OF THE REACH OF CHILDREN
NOT TIP. KEEP VENT CAPS TIGHT AT ALL TIMES
IMMEDIATELY



PE13-014 000074LCPV



PE13-014 000075LCPV



MEGA-IRON PLUS
STARTER BATTERIES



DO NOT PUT ON THE HEAD OF CATALYST
WITH WATER IN NEARBY AREA
INSTRUCTIONS IN OWNER'S MANUAL
DO NOT MAKE REPAIR SERVICE ASSISTANCE

FLUSH OUT OF THE HEAD OF CATALYST
WITH WATER IN NEARBY AREA
INSTRUCTIONS IN OWNER'S MANUAL
DO NOT MAKE REPAIR SERVICE ASSISTANCE

PERMANENTLY
RECYCLE



12V
100 AMP
1500

FROM PLUS



AG

10A

KEEP OUT OF THE REACH OF CHILDREN
DO NOT TIP. KEEP VENT CAPS TIGHT AND LEVEL.
FLUSH EYES IMMEDIATELY
WITH WATER. GET
MEDICAL HELP FAST

LEAD





INTERSTATE
MEGA-IRON PLUS

METERS STATE

MEGA TRON PLUS

DANGER / POISON

HAZARD
SIGNALS

HAZARD
SIGNALS

HAZARD
SIGNALS

HAZARD
SIGNALS

HAZARD
SIGNALS

HAZARD
SIGNALS

HAZARD
SIGNALS

HAZARD
SIGNALS

HAZARD
SIGNALS

HAZARD
SIGNALS

**KEEP OUT OF THE REACH OF CHILDREN
DO NOT FEED OR LET CHILD EAT ANY PARTS**

**FLUSH EYES IMMEDIATELY
WITH WATER FOR
MEDICAL HELP. PAST**

CAUTION: DO NOT ALLOW STARTING FLUID TO
CONTACT YOUR FACE OR SKIN. IF
CONTACT OCCURS, WASH FACE AND SKIN
THOROUGHLY WITH WATER.

RECYCLE
LEAD
ACID
BATTERY

MP-48

METERS STATE

MEGA TRON PLUS

MEGA TRON PLUS

MEGA TRON PLUS





PE13-014 000081LCPV



COMMONWEALTH OF KENTUCKY
PERRY CIRCUIT COURT
CIVIL BRANCH

FILED ENTERED _____ TENDERED _____
COSTS PAID 176 SUMMONS 2 (1RS, 1C)
DATE 8-15-08
ROGER D. COLLINS
PERRY CIRCUIT CLERK
BY: R Adams D.C.

Civil Action No. [REDACTED]

[REDACTED]

PLAINTIFF

VS.

MOUNTAIN FORD, INC.
Serve: Kenneth M. Durkin
107 Rockwood Lane
P.O. Box 857
Hazard, KY 41702-0857

DEFENDANTS

and

FORD MOTOR COMPANY
Serve: C T Corporation System
Kentucky Home Life Bldg.
Louisville, KY 40202

I hereby certify this is to be a true and correct copy. Witness my hand and seal this the 15th day of Aug 20 08
Roger D. Collins, Clerk
Circuit & District Court
Perry County, Hazard, Kentucky
By: R Adams D.C.

COMPLAINT

Come the Plaintiff, [REDACTED] (hereinafter "Plaintiff"), by counsel, and for its Cause of Action against the Defendants, Mountain Ford, Inc. and Ford Motor Company (hereinafter "Defendants"), state as follows:

1. The Plaintiff, [REDACTED] is a duly organized Kentucky Corporation organized under the laws of this Commonwealth.

2. The Defendant, Mountain Ford, Inc., is a duly organized Kentucky Corporation organized under the laws of this Commonwealth, with a principal place of

business address located at 107 Rockwood Lane, P.O. Box 857, Hazard, Kentucky 41702-0857.

3. The Defendant, Ford Motor Company (hereinafter "Ford Motor"), is a foreign corporation duly authorized to transact business in the Commonwealth of Kentucky with a process agent of C.T. Corporation System, Kentucky Home Life Building, Room 1102, Louisville, Kentucky 40202, is the manufacturer of the below described motor vehicle, and is engaged in the business of manufacturing motor vehicles for sale, including to the general public.

4. At all times material and relevant hereto, City of Hazard was the owner of the 2006 Ford 250 pickup truck, Vehicle Identification No. 1FTNF21546E [REDACTED]

5. At all times material and relevant hereto, the Plaintiff had in full force and effect a policy of motor vehicle insurance for and on behalf of the City of Hazard for the 2006 Ford 250 pickup truck.

6. On August 20, 2007, City of Hazard delivered its 2006 Ford 250 to Mountain Ford, Inc. to have the motor vehicle serviced for front end shimmy. Prior to the delivery of the vehicle to Mountain Ford, Inc., Ford Motor Company had on May 10, 2007, issued technical service bulletin 07-10-10 that the vehicle needed service due to known defects causing steering problems.

7. On August 21, 2007, after servicing was complete by Mountain Ford, Inc., Bobby Holland, an employee of City of Hazard, picked up the 2006 Ford 250 from Mountain Ford, Inc. and was driving the 2006 Ford 250 when the steering sector box malfunctioned so as to cause the 2006 Ford 250 to come into contact and collide and strike a 2003 Nissan Pickup owned by Arthur Brashear.

8. The accident occurred without any negligence or failure by the Plaintiff, [REDACTED] or its insured, City of Hazard.

9. The Defendant, Mountain Ford, Inc., failed to exercise ordinary skill and care in repairing the 2006 Ford 250 owned by the City of Hazard.

10. Defendant, Mountain Ford, Inc., intentionally and with malice misrepresented to City of Hazard that Defendant had properly repaired the 2006 Ford 250 when the Defendant knew that it had not done so.

11. Defendant, Mountain Ford, Inc., breached its contract with the Plaintiff's insured to repair the City of Hazard's 2006 Ford 250.

12. Defendant, Mountain Ford, Inc., breached its warranty to the Plaintiff that Mountain Ford Inc. had properly repaired the Plaintiff's 2006 Ford 250.

13. Defendant, Mountain Ford Inc., was negligent in failing to properly repair the Plaintiff's 2006 Ford 250.

14. This above described accident, and the circumstances surrounding from which it arose, could not have occurred in the absence of failure to exercise ordinary skill and care, misrepresentation, breach of contract, breach of warranty and/or negligence on the part of the Defendant, Mountain Ford, Inc.

15. The Defendant, Ford Motor Company, impliedly and/or expressly warranted and represented the 2006 Ford 250 Pickup Truck, as described above, to be fit for use for personal transportation as a reasonable person would expect to use and operate a motor vehicle of this type.

16. The Defendant, Ford Motor Company, has breached and/or violated any and all implied and express warranties including the implied warranties of

merchantability and of fitness for particular purpose and certain contractual and express warranties provided with delivery of the motor vehicle.

17. The subject accident resulted from a manufacturing and/or design defect on the part of the Defendant, Ford Motor Company.

18. This above-described accident, and the circumstances surrounding from which it arose, could not have occurred in the absence of negligence, design in defect and/or breach of warranty on the part of the Defendant, Ford Motor Company.

19. As a direct and proximate result of the above-described accident, the Plaintiff's insured, City of Hazard, suffered a diminution in the fair market value of its 2006 Ford 250 pickup truck in the estimated amount of Four Thousand Seven Hundred Eighty Two Dollars and 92/100 Cents (\$4,782.92).

20. As a direct and proximate result of the aforementioned accident, Plaintiff, [REDACTED] paid on behalf of its insured the amount of Fifteen Thousand Two Hundred Eighty Three Dollars and No Cents (\$15,283.00) for property damage to the other vehicle involved in this accident.

21. The Plaintiff, [REDACTED] is entitled to recover from the Defendants, Mountain Ford, Inc. and Ford Motor Company, the total amount of Twenty Thousand Sixty Five Dollars and 92/100 Cents (\$20,065.92), which it has paid and is estimated to pay as a result of the Defendants' acts as aforesaid.

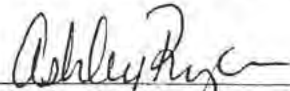
22. Plaintiff, [REDACTED] is entitled to recover amounts expended pursuant to its contract of insurance with City of Hazard as a result of Defendants' acts from the Defendants and pursuant to common law subrogation.

23. Defendants are jointly and severely liable for their acts resulting in the August 21, 2007, motor vehicle accident.

24. It is appropriate for the Court to award the Plaintiff punitive damages, along with other damages.

WHEREFORE, the [REDACTED] demands judgment against the Defendants, Mountain Ford Inc. and Ford Motor Company, in the total amount of Twenty Thousand Sixty Five Dollars and Ninety Two Cents (\$20,065.92); pre- and post-judgment interest; costs herein expended; and for any and all other relief to which they may appear entitled.

FOWLER MEASLE & BELL PLLC



Heather M. McCollum, Esq.
Ashley A. Ryan, Esq.
300 West Vine Street, Suite 600
Lexington, KY 40507-1660
(859) 252-6700
(859) 255-3735 fax
HMcCollum@FowlerLaw.com
ARyan@FowlerLaw.com

**ATTORNEYS FOR PLAINTIFF,
KENTUCKY LEAGUE OF CITIES**

All Action Details for Issue

Print

VIN: 1FTNE21546E [REDACTED] Year: 2006 Model: F-SERIES SUPER DUTY Case: [REDACTED]
 Name: [REDACTED] Owner Status: Original WSD: 2006-11-27
 Symptom Desc: STRG/HANDLING FUNCTION Primary Phone: [REDACTED]
 Reason Desc: LEGAL - ACCIDENT Secondary Phone:
 Issue Type: 07 LEGAL Issue Status: CLOSED

Action: OPEN LEGAL COANTACT - PRODUCT LIABILITY - ACCIDENT Origin Desc: OGC - CLAIMS
 Dealer: 02009 MOUNTAIN FORD INC
 Odometer: 138 MI Comm Type: INBOUND EMAIL-OTHER
 Analyst Name: TAYLOR (ATAYLO29),ALMA Analyst: ATAYLO29
 Action Date: 09/26/2007 Action Time: 09.44.08.892 Action Data: No

Comments **LPA RECEIVED A DEALER REQUEST FOR CONSUMER AFFAIRS REVIEW FORM SUBMITTED BY K. BEATY, ZM, 800 380-3880. ACCORDING TO THE INFORMATION PROVIDED, IT'S ALLEGED THAT THE STEERING BOX CAME APART ALLOWING THE STEERING GEAR TO BACK OUT OF THE BOX, THE STEERING MECHANISM FAILED, VEHICLE WENT OUT OF CONTROL, AND COLLIDED WITH ANOTHER VEHICLE. INCIDENT DATE: [REDACTED] MOUNTAIN FORD, P/A: 02009, RECEIVED A LETTER FROM COLLINS & COMPANY INSURANCE REPRESENTATIVE FOR THE CITY OF HAZARD. AS A RESOLUTION, THEY ARE SEEKING MONIES THEY HAVE OR WILL PAY FOR THE ACCIDENT. THE LETTER, DATED 9-18-2007, ALSO STATED THAT THIS VEHICLE WOULD BE AVAILABLE FOR INSPECTION 30 DAYS FROM THE DATE OF THE LETTER.

Action: MAKE OUTBOUND CALL TO OTHER Origin Desc: OGC - CLAIMS
 Dealer: 02009 MOUNTAIN FORD INC
 Odometer: 138 MI Comm Type: INBOUND FAX-OTHER
 Analyst Name: TAYLOR (ATAYLO29),ALMA Analyst: ATAYLO29
 Action Date: 09/26/2007 Action Time: 09.46.04.702 Action Data: Yes

Comments **LPA SPOKE TO K. BEATY, SHE CONFIRMED THE ISSUE INFORMATION AND FORWARDED A COPY OF THE COLLINS & CO LETTER TO LPA.

Data Element Name	Data Value
CONTACT PERSON	K. BEATY

Action: REDIRECT TO OGC - OTHER Origin Desc: OGC - CLAIMS
 Dealer: 02009 MOUNTAIN FORD INC
 Odometer: 138 MI Comm Type: OUTBOUND MAIL-OTHER
 Analyst Name: TAYLOR (ATAYLO29),ALMA Analyst: ATAYLO29
 Action Date: 09/26/2007 Action Time: 09.47.59.289 Action Data: No

Comments **LPA WILL FORWARD THE INFORMATION, VIA INTER-OFFICE MAIL, TO OGC/INSURANCE SUBROGATION FOR HANDLING.

Ford Confidential



**KENTUCKY UNIFORM POLICE
TRAFFIC COLLISION REPORT**

MASTER FILE # [REDACTED]

INVESTIGATING AGENCY: **KY STATE POLICE, POST 13** AGENCY ORI NUMBER: [REDACTED] LOCAL CODE: [REDACTED]

ROADWAY NAME: **CRAWFORD MT EAST** PARKING LOT: **N** INTERSECTION WITH: **N** BETWEEN STREETS: **N**

ROADWAY #	DISTANCE FROM MILEPOINT	MILEPOINT #	INJURED	KILLED	# UNITS INVOLVED 2	HIT & RUN NO	ONE WAY NO	SPEED LIMIT 55 MPH
-----------	-------------------------	-------------	---------	--------	-----------------------	-----------------	---------------	-----------------------

IN CITY LIMITS? **YES** LATITUDE DEG: 37 MIN: 17.148 COLLISION DATE AND TIME: 08/21/2007 09:00
MILES FROM CITY LONGITUDE DEG: 83 MIN: 12.384

CITY/TOWN: **093701 - HAZARD** RAMP: **NO**
FROM: DIR: [REDACTED]
TO: DIR: [REDACTED]

MANNER OF COLLISION: **07 - SIDESWIPE - OPPOSITE DIRECTION** LOCATION 1ST EVENT: **03 - ON ROADWAY** TRAFFIC CONTROL: **01 - ADVISORY SPEED SIGN
03 - CURVE SIGN**

ROADWAY TYPE: **01 - COUNTY ROAD** TOTAL LANES: **2** ROADWAY CHARACTER: **02 - CURVE & HILLCREST** ROADWAY SURFACE: **01 - ASPHALT** ROADWAY CONDITION: **05 - WET**

WEATHER: **06 - RAINING** LIGHT CONDITION: **02 - DAYLIGHT** LAND USE: **01 - BUSINESS** SCHOOL BUS RELATED: **03 - NOT APPLICABLE**

FIRST AID AT SCENE: **NO** FIRST AID GIVEN BY: [REDACTED]
INJURED REMOVED TO: [REDACTED]

EMS AGENCY AND RUN #			EMS AGENCY AND RUN #			EMS AGENCY AND RUN #		
NOTIFIED TIME	ARRIVED TIME	TIME AT HOSPITAL	NOTIFIED TIME	ARRIVED TIME	TIME AT HOSPITAL	NOTIFIED TIME	ARRIVED TIME	TIME AT HOSPITAL

INJURED OR DECEASED REMOVED BY: [REDACTED]

1 PROPERTY DAMAGE - OTHER THAN VEHICLES: [REDACTED] PROPERTY: [REDACTED]

OWNER/ADDRESS: [REDACTED]

2 PROPERTY DAMAGE - OTHER THAN VEHICLES: [REDACTED] PROPERTY: [REDACTED]

OWNER/ADDRESS: [REDACTED]

3 PROPERTY DAMAGE - OTHER THAN VEHICLES: [REDACTED] PROPERTY: [REDACTED]

OWNER/ADDRESS: [REDACTED]

INV. COMPLETE: **YES** PHOTOS: **YES** PHOTOGRAPHER UNIT NO.: **278**

INVESTIGATOR: **PICKRELL J** ID NUMBER: **278** BEAT OR POST NO.: **13** TIME NOTIFIED: **09:15** TIME ARRIVED: **09:50** RDWY OPENED: **10:45**

REVIEWED BY: **R ENGLE** PAGE: **1 OF 4**

KENTUCKY UNIFORM POLICE TRAFFIC COLLISION REPORT - NARRATIVE

KSP 74 Revised 1/2000

MASTER FILE # [REDACTED]

INVESTIGATING AGENCY KY STATE POLICE, POST 13

AGENCY ORI NUMBER [REDACTED]

LOCAL CODE

UNIT 1 WAS TRAVELING DOWN CRAWFORD MT. AND THE STEERING WENT OUT ON HIS TRUCK. UNIT 2 WAS TRAVELING UP CRAWFORD MT. UNIT 1 STRUCK 2 IN THE SIDE AND THEN STRUCK THE GUARDRAIL. UNIT 1 ADVISED THAT HE HAD LEFT HIS TRUCK AT MT. FORD IN REFERENCE TO FRONT END REPAIR AND HAD JUST PICKED IT BACK UP. IT WAS ALSO RAINING AND CRAWFORD MT. WAS WET AND SLIPPERY.

KENTUCKY UNIFORM POLICE TRAFFIC COLLISION REPORT - UNIT

MASTER FILE # [REDACTED]

INVESTIGATING AGENCY **KY STATE POLICE, POST 13** AGENCY ORI NUMBER [REDACTED] LOCAL CODE [REDACTED]

UNIT # TOWED? **2** YES - WALKERTOWN # OCCUPANTS **1** PEDESTRIAN FACTORS

OPERATOR'S LIC. NO. [REDACTED] STATE **KY** OPERATORS LICENSE RESTRICTIONS

CDL **NO** CO. RESIDENT **YES** OWNER **YES**

OPERATOR NAME (L, N, F, M, I) [REDACTED]

DATE OF BIRTH [REDACTED] ADDRESS [REDACTED] COMPLIANT **YES**

A. PRE-COLLISION VEHICLE ACTION **05 - GOING STRAIGHT AHEAD** B. UNIT TYPE **08-LT TRUCK(VAN/SPORTS UTILITY/PICKUP)** C. FIRE **NO** D. OVERTURNED **NO**

E. HUMAN FACTORS **99 - NONE DETECTED**

F-H. EVENT COLLISION **IST: 05 - OTHER MOTOR VEHICLE**

I. VEHICULAR FACTORS **99 - NONE DETECTED** J. ENVIRONMENTAL FACTORS **99 - NONE DETECTED**

K. UNDERRIDE/OVERRIDE **01 - NO UNDERRIDE/OVERRIDE**

INVOLVED PERSONS: NAME, ADDRESS, CITY, STATE AND ZIP		DOB/DOD	14	15	16	17	18	19	20	21	22	23
[REDACTED]	MALE	DOB [REDACTED]	08,01	NO	01	05		01	01	01	01	01
VIPER, KY												

VEH YEAR **2003** MAKE **NISSAN** MODEL **FRONTIER** TYPE **PK** STATE **KY** REGISTRATION NUMBER [REDACTED] YEAR **2008**

VEHICLE ID NUMBER **1NGED26Y83** VEHICLE INSURED **YES** NAME OF INSURANCE CO. **SAFECO** COLOR OF VEH **SILVER**

1ST AREA OF CONTACT **07 - LEFT SIDE** 1ST AREA CONTACT - COMBINATION VEHICLE **MINOR/MOD** EXTENT OF DAMAGE **MINOR/MOD** AIR BAG SWITCH **ON** TRAVEL DIRECTION **WEST**

ESTIMATED TRAVEL SPEED MOST HARMFUL EVENT

COMMERCIAL VEH. **NO** HAZ. CARGO **NO** HAZ. SPILL **NO** HAZ. CARGO CODE **NO** TYPE CARGO/COMMODITY **NO** NAS SAFETY REPORT #

SINGLE/COMBINATION/BOBTAIL **NO** NO. AXLES **NO** NO. TRAILERS **NO** US DOT # **NO** ICC MC # **NO** CRASH AVOIDANCE (Fatal Only)

GVWR TOTAL **NO** MOTOR CARRIER NAME **NO** CARRIER NAME SOURCE

MOTOR CARRIER ADDRESS

VIOLATION CODES **NO** CITATION NUMBER **NO** CASE NUMBER **NO** SUSPECTED DRINKING DRIVER **NO** METHOD OF DETERMINATION **02 - OBSERVATION**

TAKEN BY

TEST OFFERED **NO** CHEMICAL TEST **NO** TESTED FOR **NO** SENT TO **NO** RESULTS **NO** PAGE

KSP 74 Revised 1/2000

KENTUCKY UNIFORM POLICE TRAFFIC COLLISION REPORT - UNIT

MASTER FILE # 7 [REDACTED]

INVESTIGATING AGENCY **KY STATE POLICE, POST 13** AGENCY ORI NUMBER [REDACTED] LOCAL CODE [REDACTED]

UNIT # **1** TOWED? **YES** # OCCUPANTS **1** PEDESTRIAN FACTORS

OPERATOR'S LIC. NO. [REDACTED] STATE **KY** OPERATORS LICENSE RESTRICTIONS

CDL **NO** CO. RESIDENT **YES** OWNER **NO**

OPERATOR NAME (LN, FN, MI) [REDACTED] DATE OF BIRTH [REDACTED] ADDRESS [REDACTED] HAZARD, KY [REDACTED] COMPLIANT **YES**

A. PRE-COLLISION VEHICLE ACTION **05 - GOING STRAIGHT AHEAD** B. UNIT TYPE **08-LT TRUCK(VAN/SPORTS UTILITY/PICKUP)** C. FIRE **NO** D. OVERTURNED **NO**

E. HUMAN FACTORS: **99 - NONE DETECTED**

F-H. EVENT COLLISION
 1ST: **05 - OTHER MOTOR VEHICLE**
 2ND: **20 - GUARDRAIL FACE**

I. VEHICULAR FACTORS **07 - STEERING FAILURE** J. ENVIRONMENTAL FACTORS **71 - SLIPPERY SURFACE**

K. UNDERRIDE/OVERRIDE **01 - NO UNDERRIDE/OVERRIDE**

INVOLVED PERSONS: NAME, ADDRESS, CITY, STATE AND ZIP	DOB/DOD	14	15	16	17	18	19	20	21	22	23
[REDACTED] MALE	DOB: [REDACTED]	01	NO	01	05		01	01	01	01	01
HAZARD, KY [REDACTED]											
CITY OF HAZARD, KY [REDACTED]		08	NO								
HAZARD, KY [REDACTED]											

VEH YEAR **2006** MAKE **FORD** MODEL **F-250** TYPE **PK** STATE **KY** REGISTRATION NUMBER [REDACTED] YEAR **2008**

VEHICLE ID NUMBER **1FTNF215461** VEHICLE INSURED **YES** NAME OF INSURANCE CO. [REDACTED] COLOR OF VEH **BLUE**

1ST AREA OF CONTACT **07 - LEFT SIDE** 1ST AREA CONTACT - COMBINATION VEHICLE **EXTENT OF DAMAGE MINOR/MOD** AIR BAG SWITCH **ON** TRAVEL DIRECTION **EAST**

ESTIMATED TRAVEL SPEED [REDACTED] MOST HARMFUL EVENT [REDACTED]

COMMERCIAL VEH. **NO** HAZ. CARGO **NO** HAZ. SPILL **NO** HAZ. CARGO CODE [REDACTED] TYPE CARGO/COMMODITY [REDACTED] WAS SAFETY REPORT # [REDACTED]

SINGLE/COMBINATION/BOBTAIL **NO** NO. AXLES **NO** NO. TRAILERS **NO** US DOT # [REDACTED] ICC MC# [REDACTED] CRASH AVOIDANCE (Fatal Only) [REDACTED]

GVWR TOTAL [REDACTED] MOTOR CARRIER NAME [REDACTED] CARRIER NAME SOURCE [REDACTED]

MOTOR CARRIER ADDRESS [REDACTED]

VIOLATION CODES [REDACTED] CITATION NUMBER [REDACTED] CASE NUMBER [REDACTED] SUSPECTED DRINKING DRIVER **NO** METHOD OF DETERMINATION **02 - OBSERVATION**

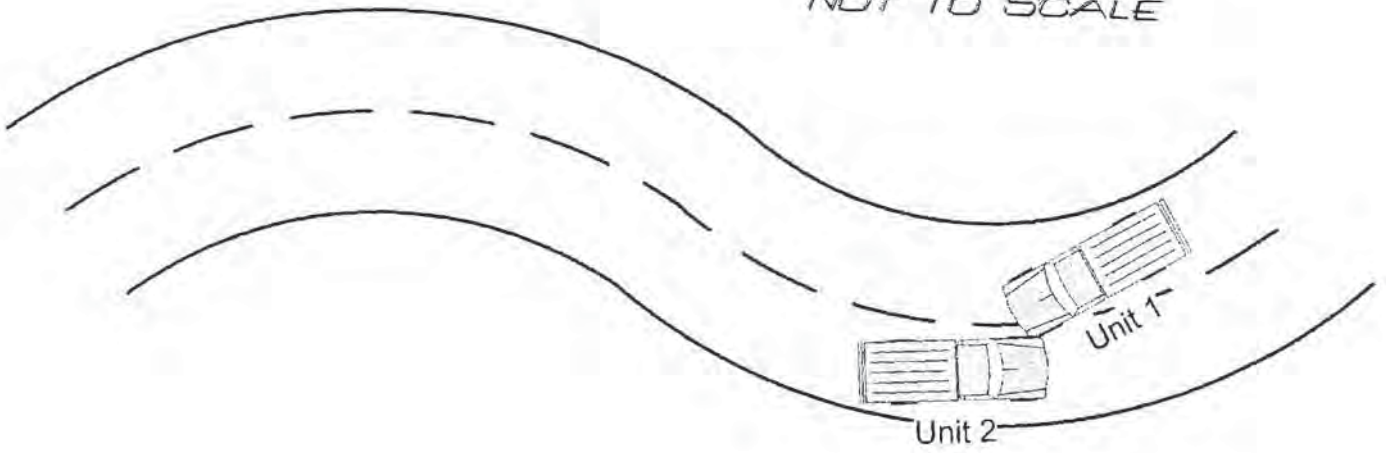
TAKEN BY [REDACTED]

TEST OFFERED **NO** CHEMICAL TEST [REDACTED] TESTED FOR [REDACTED] SENT TO [REDACTED] RESULTS [REDACTED] PAGE **4 OF 4**

KSP 74 Revised 1/2000



NOT TO SCALE



Mountain Ford, Inc.

155628

DANIEL BOONE PARKWAY
P.O. BOX 857

HAZARD, KENTUCKY 41702-0857
TELEPHONE: (606) 436-5239



CUSTOMER # [REDACTED]

WORKORDER
REPRINT
PAGE 2

HAZARD, KY
HOME [REDACTED] US:

SERVICE ADVISOR: 896 COMBS, ALEX G

COLOR	YEAR	MAKE/MODEL	VIN	LICENSE	MILEAGE IN/ OUT	TAG	
BLUE	06	FORDT F250 PICKUP	1FTNF21546E [REDACTED]		20660/	T226	
DEL DATE	PROD. DATE	WARR. EXP.	PROMISED	PO NO.	RATE	PAYMENT	INV. DATE
29NOV06 DD			17:00 20AUG07		70.00	CASH	
R.O. OPENED	READY	OPTIONS: STK:T69299 ENG:5.4_Liter_EFI					
20AUG2007 08:00							

LINE OP CODE	FLAT TECH.	TYPE	DESCRIPTIONS/INSTRUCTIONS
# A		W	C/S= SHIMMIE IN FRONT END WHEN HITTING BUMPS OR DROPPING OFF ENDS OF BRIDGES



WORK ORDER

EXCLUSION OF WARRANTIES

Any warranties on the parts and accessories sold hereby are made by the manufacturer. The undersigned purchaser understands and agrees that dealer makes no warranties of any kind, express or implied, and disclaims all warranties, including warranties of merchantability or fitness for a particular purpose, with regard to the parts and/or accessories purchased; and that in no event shall dealer be liable for incidental or consequential damages or commercial losses arising out of such purchase. The undersigned purchaser further agrees that the warranties excluded by dealer, include, but are not limited to any warranties that such parts and/or accessories are of merchantable quality or that they will enable any vehicle or any of its systems to perform with reasonable safety, efficiency, or comfort.

AUTHORIZATION FOR REPAIRS

I hereby authorize the repair work herein set forth to be done along with the necessary material and agree that you are not responsible for loss or damage to vehicle or articles left in vehicle in case of fire, theft or any other cause beyond your control or for any delays caused by unavailability of parts or delays in parts shipments by the supplier or transporter. I hereby grant you and/or your employees permission to operate the vehicle herein described on streets, highways or elsewhere for the purpose of testing and/or inspection. An express mechanic's lien is hereby acknowledged on above vehicle to secure the amount of repairs thereto. The dealership is not responsible for damages from freezing due to lack of antifreeze.

PRELIMINARY ESTIMATE \$ _____

AUTHORIZED BY X

REVISED ESTIMATE (1)	DATE	TIME	BY
REVISED ESTIMATE (2)			
REVISED ESTIMATE (3)			

I HEREBY ACKNOWLEDGE THAT I WAS NOTIFIED & GAVE ORAL APPROVAL OF THE ABOVE REVISED ESTIMATES:

X _____
CUSTOMER SIGNATURE

TECHNICIAN COPY



PRIVILEGED & CONFIDENTIAL

Office of the General Counsel

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

October 4, 2007

Collins & Company
112 W Court, Suite 203
Prestonburg, KY 41653
ATTENTION: Beth Moore

RE: Your Insured: [REDACTED]
Your Claim #: [REDACTED]
DOL: August 21, 2007

Dear Ms. Moore:

We acknowledge your recently submitted subrogation claim letter dated September 18, 2007. In order to assist us in evaluating your claim, we request that you provide us with the following information (Please note that the information requested is in regard to the Ford manufactured vehicle.)

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

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

- 9. What was the city and state of occurrence: Hazard KY
- 10. The 17 digit vehicle identification number: 1FTNF21546E [REDACTED]
- 11. What was the mileage at time of occurrence: ~~22,676~~ 20,715
- 12. What is the alleged defect: Steering Sector Box Came Apart Causing A loss of directional control and resulting in a MVA
- 13. Has the alleged defective part been repaired or replaced? (circle one) Yes or **(No)**

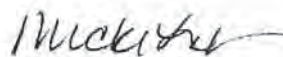
- 14. What is the current location of the vehicle, and the alleged defective part(s)?
Walker Body and Frame Shop, 23 Pineview Dr. Hazard
- 15. List all after market additions or modifications that were made to the vehicle:
Ford Modified the vehicle from a diesel engine to a gas engine. Our insured made no request for this modification ~ made no other after market additions or modifications
- 16. Was the engine running? (circle one) Yes or No
- 17. Were the keys in the ignition? (circle one) Yes or No
- 18. Was this vehicle purchased new or used: new
If purchased used, provide the date of purchase, mileage at the time of purchase, and from whom the vehicle was purchased:

Once we are in receipt of the requested information, it will be reviewed and you will be notified of our decision concerning your claim. Should you not send all of the requested information and materials within 90 days, we will assume that you are not interested in pursuing a claim and we will close our file. Please note that your vehicle will not be inspected until all the above information has been submitted and a determination has been made as to whether an inspection is warranted.

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

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

Sincerely,



Micki Lynn
Claims Analyst



Collins & Company, Incorporated

112 West Court, Suite 203

Prestonsburg, Kentucky 41653

Phone: (606) 886-1967

Fax (606) 886-1334

e-mail: pburg@collinsandco.com

September 18, 2007

Mr. Kenneth Durkin
MOUNTAIN FORD, INC.
P. O. Box 857
Hazard, KY 41702-0857



SEP 26 2007
[Handwritten signature]

FORD MOTOR COMPANY
CT Corporation System
KY Home Life Building
Louisville, KY 40202

RE: Claim Number: [REDACTED]
Insured: [REDACTED]
Claimant: [REDACTED]
Date of Loss: 8/21/2007

Dear Sirs:

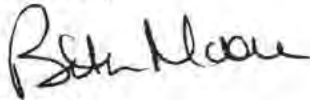
We are the claims representatives for the [REDACTED] who insure the [REDACTED]. On September 21, 2007, a motor vehicle accident occurred involving a 2006 Ford F250 pickup truck (VIN 1FTNF21546E [REDACTED]). During this incident, the steering mechanism of the vehicle failed and the vehicle went out of control, colliding with another vehicle, causing substantial damage to both vehicles. Our review and inspection of this matter reveals that the steering box came apart, allowing the steering gear to back out of the box.

We are therefore looking to you for monies we have or will be called upon to pay in reference to this matter. Please bring this letter to the attention of your insurance representatives and have them contact me to arrange inspection of the vehicle as soon as possible.

We will make this vehicle available for inspection for a period of 30 days from the date of this letter.

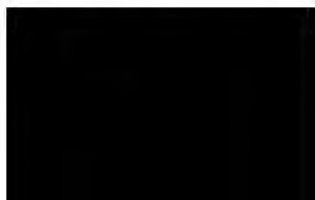
September 18, 2007
Page Two

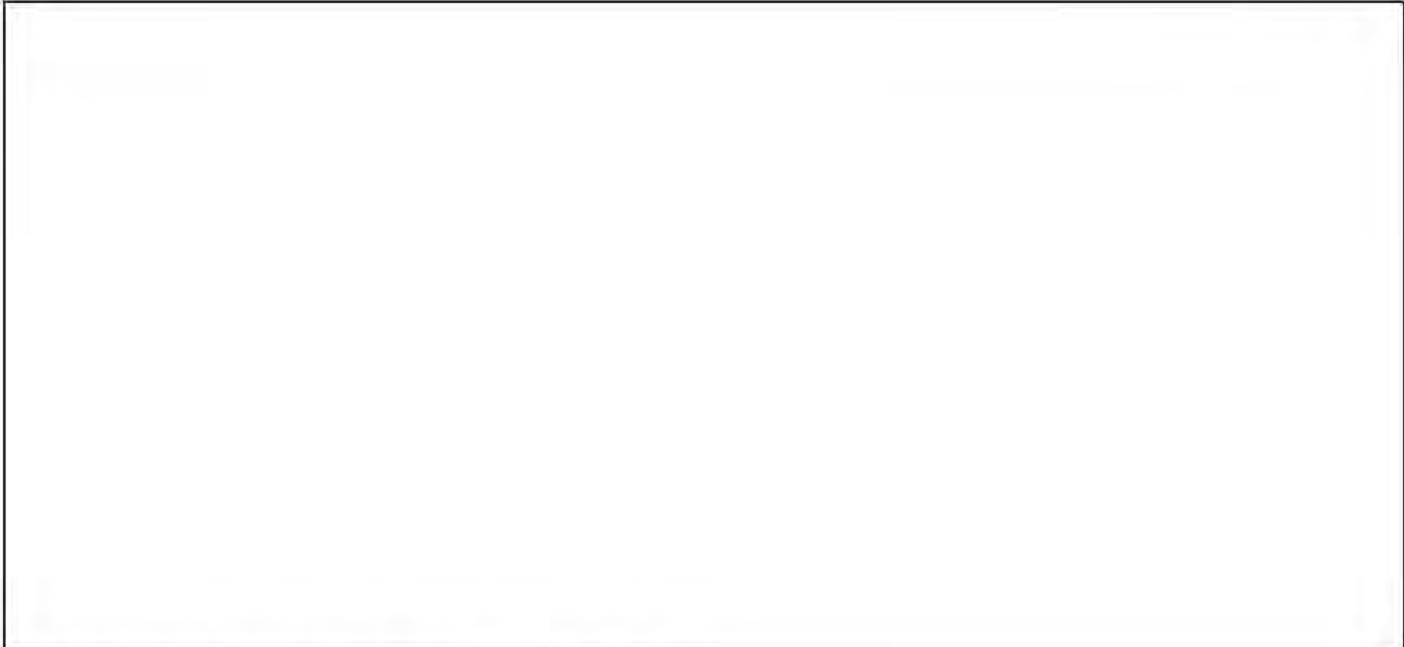
Sincerely,

A handwritten signature in black ink that reads "Beth Moore". The signature is written in a cursive style with a large initial "B".

Beth Moore
Claims Adjuster

Cc:





From: dcpform@ford.com [mailto:dcpform@ford.com]
Sent: Monday, September 24, 2007 2:11 PM
To: Ordcalp, F (F.)
Subject: Dealer Request For Consumer Affairs Review

Dealer Request For Consumer Affairs Review - All Regions

Dealership Name: Mountain Ford
Requesting Dealer: Kenneth Durkin
Contact Person: Kenneth Durkin
Telephone: 1-800-3803880
Email Address: kbeaty4@ford.com
PA Code: 02009
Region: Cincinnati
City: Hazard
Dealer State: KY
Fax Number: 606-436-4765
WSD: 11/27/2006
Vehicle Year: 2006
Vehicle Model: F250
Vehicle VIN: 1FTNF21546E [REDACTED]
Mileage: 138
Customer Name: [REDACTED]
Street Address: [REDACTED]
City: Hazard
State: Kentucky
Zip Code: [REDACTED]
Home Phone: [REDACTED]
Work Phone: unknown
Customer Region: A1 - Select Dealer
Incident Involves: Accident
Date of Incident: [REDACTED]

9/25/2007

County in which incident occurred: unknown

Is Alleging Defect: Yes

Alleging defect detail: alleges steering box came apart allowing steering gear to back out of the box, the steering mechanism of the vehicle failed and the vehicle went out of control, colliding with another vehicle

Police Report Filed: Yes

Police Report detail: unknown

Insurance Company Contacted: Y

Insurance Company Advice: looking to Mountain Ford and Ford Motor Company for monies we have or will be called upon to pay in reference to this matter

Insurance Company Contact Information: Beth Moore, Claims Adjuster, Collins & Company Inc., 112 West Court, Suite 203, Prestonsburg, KY 41653, (606) 886-1967

Coach Builder: no

Coach Builder State: AK - Alaska

Resolution Sought Detail: monies we have or will be called upon to pay in reference to this matter

Comments: per dealership, truck operated by City of Hazard, may be serviced by City service personnel; Zone Manager Karen Beaty has attached OASIS report showing no warranty repairs performed on vehicle and no TSB, no FSA, no advisories of any kind regarding steering

This email was automatically generated. Please do not reply to this email. No one monitors the inbox for this email address.

9/25/2007

CLAIM NUMBER: [REDACTED]
DONAN PROJECT NUMBER: 06-07090357-0

PREPARED FOR:

[REDACTED]
PRESTONSBURG, KENTUCKY [REDACTED]

PREPARED BY:



DONAN ENGINEERING CO., INC.
997 FLOYD DRIVE, SUITE 160
LEXINGTON, KENTUCKY 40505
(859) 381-1007

OCTOBER 19, 2007

HERB GOFF, P.E., P.G., C.F.E.I.
SENIOR FORENSIC ENGINEER

John G. Donan, Jr., P.E.
Chairman of the Board

J. Lyle Donan, P.E.
President



CORRESPOND TO:
997 Floyd Drive, Suite 160
Lexington, Kentucky 40505
(859) 381-1007
(859) 381-1586 fax

October 19, 2007

[REDACTED]
[REDACTED]
[REDACTED]
Prestonsburg, Kentucky [REDACTED]

RE:

[REDACTED]
Donan Project Number: 06-07090357-0

Dear Ms. Moore:

At your request, on September 14, 2007, a study was made on a vehicle owned as referenced above. At the time of our study the vehicle was located at Amos Walker Body Shop in Hazard, Kentucky. The purpose of the study was to determine if a mechanical problem led to an accident. Mr. [REDACTED], driver, was present to point out areas of concern and provide firsthand information. This letter, with the attached photographs, is a summary report of our findings and conclusions. Additional details and photographs have been retained in our project file.

Description of Vehicle

For purposes of this report, the driver's side of the vehicle will be considered to be the left and the hood the front. The vehicle is a blue 2006 Ford pickup truck model F250 and has Kentucky license plate [REDACTED] (Photographs 1 through 5). The vehicle identification number is 1FTNF21546E [REDACTED] (Photograph 6). At the time of our study the vehicle's odometer read 20,715 (Photograph 7).

Background

Mr. ██████████ relayed driving the vehicle down a county road when he became unable to steer around a curve. He struck an on-coming vehicle before coming to rest at the outer edge of the highway.

Mr. ██████████ also indicated the vehicle had just been picked up from the local Ford dealer, Mountain Ford, Inc., for a shimmy problem. He said that at highway speeds, when hitting a bump, such as driving off a bridge onto the roadway, the steering wheel would shimmy. He reported no other problems or work being performed on the vehicle prior to the crash.

Site Study

Inside the vehicle there are no encumbering floor mats or loose objects which might have interfered with the floor controls (Photograph 8). The brake pedal has adequate space above the floorboard when firmly depressed and does not “leak down”, as would occur if there were a problem with the braking system (Photograph 9). The steering wheel turns freely in either direction (Photograph 10).

Under the hood there is no evidence of impact damage (Photographs 11 and 12). The brake fluid reservoir has adequate fluid (Photograph 13). The power steering/hydraulic fluid reservoir is empty (Photographs 14 through 16).

Study of the steering sector box revealed copious amounts of an oily fluid in the vicinity (Photograph 17). In addition, the worm gear has backed out the sector box (Photograph 18).

Study of the impact area revealed somewhat minor damage to the left fender and left side of the grill (Photograph 19). The lip of the left front steel wheel is bent, but the tire remained inflated (Photograph 20). Study beneath the vehicle did not reveal damaged or disconnected suspension or steering components (Photographs 21 through 23).

Discussion with Mr. Alex Combs, service manager with Mountain Ford, Inc., indicated they followed the recommend procedure for servicing the known shimmy in the subject vehicle. This included the procedure outlined in Technical

Service Bulletin (TSB) 07-10-10. A review of this bulletin did not reveal that it included disassembly of the steering sector box.

Compilation

Based on Mr. [REDACTED] statement, he was driving in a normal manner on a public roadway when he lost the ability to steer. Subsequent to the accident, the steering sector box was found to have come partially apart, rendering the steering system inoperable.

Summary of Conclusions

In summary, based on what is known at this time, we are of the opinion that:

- The steering sector box came apart, causing a loss of directional control and resulting in the accident
- There is no evidence that the accident caused this condition.

We appreciate your confidence in our professional services.

Sincerely,
DONAN ENGINEERING CO., INC.

Herb Goff, P.E., P.G., C.F.E.I.
Senior Forensic Engineer

Attachment



Photograph001.JPG: General view showing the front and right side of the vehicle.



Photograph002.JPG: Front and left side.



Photograph003.JPG: Left side and rear.



Photograph004.JPG: Rear and right side.



Photograph005.JPG: License plate.



Photograph006.JPG: VIN decal.



Photograph007.JPG: Odometer.



Photograph008.JPG: General view showing the driver's area.



Photograph009.JPG: Brake pedal depressed.



Photograph010.JPG: Moving the steering wheel freely.



Photograph011.JPG: Right side of the engine bay.



Photograph012.JPG: Left side of the engine bay.



Photograph013.JPG: Brake fluid reservoir.



Photograph014.JPG: Top of steering fluid reservoir.



Photograph015.JPG: Looking into the power steering fluid reservoir.



Photograph016.JPG: Empty.



Photograph017.JPG: Oily substance around sector box.



Photograph018.JPG: Worm gear partially out of sector box.



Photograph019.JPG: Left side damage.



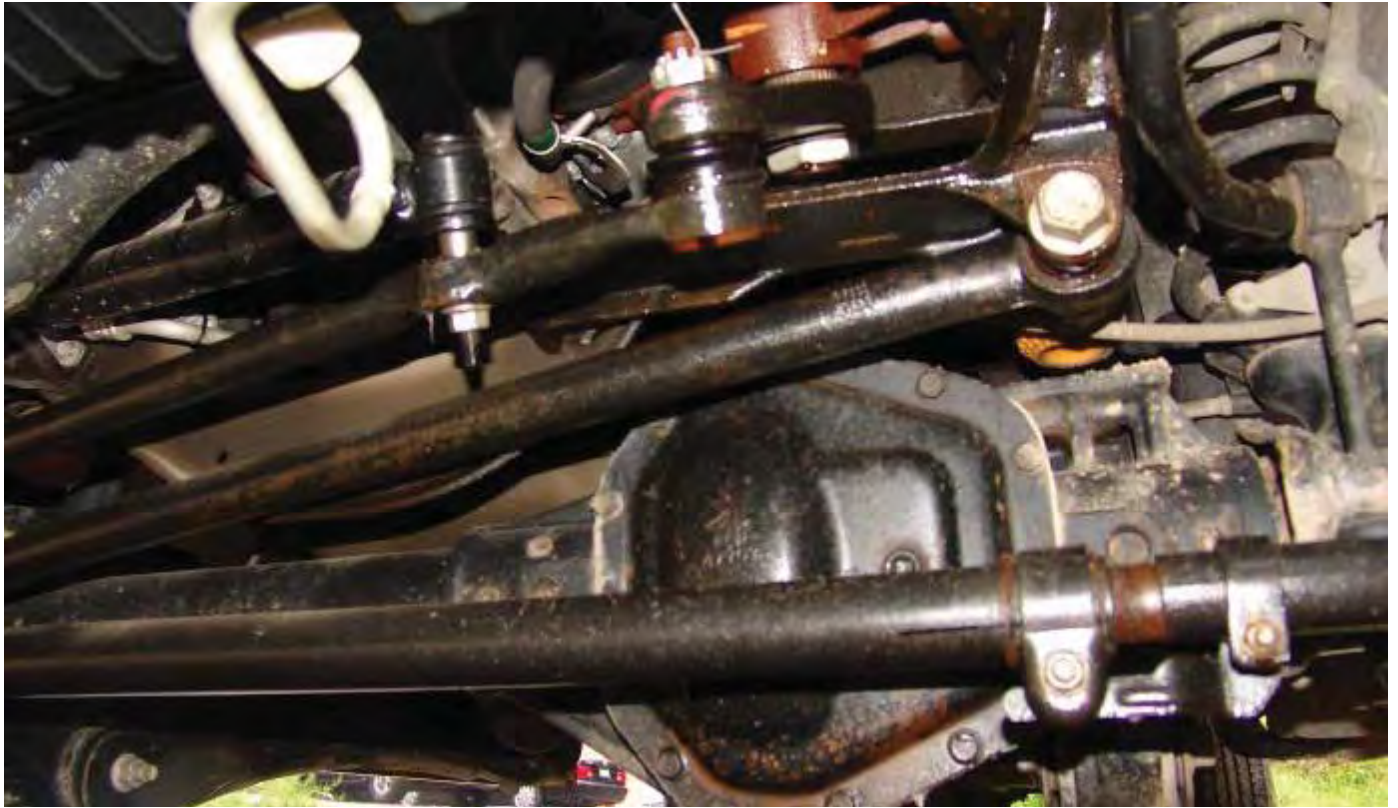
Photograph020.JPG: Damage to wheel



Photograph021.JPG: Steering undamaged.



Photograph022.JPG: Pitman arm and drag link in place.



Photograph023.JPG: General view showing steering components intact and without damage.

INSURED : [REDACTED]	DATE OF REPORT : 08/31/2007
LOCATION :	DATE OF LOSS :
COMPANY :	POLICY NUMBER :
:	CLAIM NUMBER : [REDACTED]
:	ADJUSTER NAME : Beth Moore

Photo ID : MVC-001S.JPG



Photo # : 1
Date :
Taken By : Adjuster

Comment :

MVC-001S

Photo ID : MVC-002S.JPG



Photo # : 2
Date :
Taken By : Adjuster

Comment :

MVC-002S

INSURED : [REDACTED]
LOCATION :
COMPANY :
:

DATE OF REPORT : 08/31/2007
DATE OF LOSS :
POLICY NUMBER :
CLAIM NUMBER : [REDACTED]
ADJUSTER NAME : Beth Moore

Photo ID : MVC-003S.JPG



Photo # : 3
Date :
Taken By : Adjuster

Comment :
MVC-003S

Photo ID : MVC-004S.JPG



Photo # : 4
Date :
Taken By : Adjuster

Comment :
MVC-004S

INSURED : ██████████
LOCATION : ██████████
COMPANY : ██████████
:

DATE OF REPORT : 08/31/2007
DATE OF LOSS :
POLICY NUMBER :
CLAIM NUMBER : ██████████
ADJUSTER NAME : Beth Moore

Photo ID : MVC-005S.JPG



Photo # : 5
Date :
Taken By : Adjuster

Comment :
MVC-005S

Photo ID : MVC-006S.JPG



Photo # : 6
Date :
Taken By : Adjuster

Comment :
MVC-006S

INSURED
LOCATION

: [REDACTED]

[REDACTED]

:
:
:
:

DATE OF REPORT : 08/31/2007

DATE OF LOSS :

POLICY NUMBER

[REDACTED]

ADJUSTER NAME : Beth Moore

Photo ID : MVC-007S.JPG



Photo # : 7
Date :
Taken By : Adjuster

Comment :
MVC-007S

Photo ID : MVC-008S.JPG



Photo # : 8
Date :
Taken By : Adjuster

Comment :
MVC-008S

INSURED :
LOCATION :
COMPANY :

[REDACTED]

DATE OF REPORT : 08/31/2007
DATE OF LOSS :
POLICY NUMBER :
CLAIM NUMBER :
ADJUSTER NAME : Beth Moore

Photo ID : MVC-009S.JPG



Photo # : 9
Date :
Taken By : Adjuster
Comment :
MVC-009S

Photo ID : MVC-010S.JPG



Photo # : 10
Date :
Taken By : Adjuster
Comment :
MVC-010S

INSURED :
LOCATION :
COMPANY :

[REDACTED]

DATE OF REPORT : 08/31/2007
DATE OF LOSS :
POLICY NUMBER :
CLAIM NUMBER :
ADJUSTER NAME : Beth Moore

Photo ID : MVC-011S.JPG



Photo # : 11
Date :
Taken By : Adjuster
Comment :
MVC-011S

Photo ID : MVC-012S.JPG



Photo # : 12
Date :
Taken By : Adjuster
Comment :
MVC-012S

INSURED : ██████████
LOCATION : ██████████
COMPANY : ██████████
:

DATE OF REPORT : 08/31/2007
DATE OF LOSS :
POLICY NUMBER :
CLAIM NUMBER : ██████████
ADJUSTER NAME : Beth Moore

Photo ID : MVC-013S.JPG



Photo # : 13
Date :
Taken By : Adjuster

Comment :
MVC-013S

Photo ID : MVC-014S.JPG



Photo # : 14
Date :
Taken By : Adjuster

Comment :
MVC-014S

INSURED : ██████████
LOCATION : ██████████
COMPANY : ██████████
:

DATE OF REPORT : 08/31/2007
DATE OF LOSS :
POLICY NUMBER :
CLAIM NUMBER : ██████████
ADJUSTER NAME : Beth Moore

Photo ID : MVC-015S.JPG



Photo # : 15
Date :
Taken By : Adjuster

Comment :
MVC-015S

Photo ID : MVC-016S.JPG



Photo # : 16
Date :
Taken By : Adjuster

Comment :
MVC-016S



WALTER R. BYARS

CITY ATTORNEY

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tdavis@montgomeryal.gov



KIMBERLY O. FEHL

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WALLACE D. MILLS

STAFF ATTORNEY
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MICHAEL D. BOYLE

STAFF ATTORNEY
mboyle@montgomeryal.gov

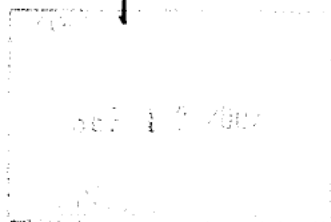
ALLISON H. HIGHLEY

ASSOCIATE ATTORNEY
ahighley@montgomeryal.gov

August 31, 2007

FORD MOTOR COMPANY
Office of General Counsel
Attn: Shawn Norton
Parklane Towers West
3 Parklane Blvd., Suite 400
Dearborn, MI 48126

SEP 10 2007



Re: Warranty claim for accident damage

Dear Mr. Norton:

On July 12, 2007, a 2006 Ford F-350 (VIN # 1FDWW36Y76E [REDACTED]) owned by the [REDACTED] suffered a steering system failure that resulted in body damage to the vehicle and property damage to a fence owned by the [REDACTED]. A copy of the Montgomery Police Department accident report and photos are attached for your review.

The vehicle in question was transported to Montgomery Ford Lincoln Mercury, 4000 Eastern Blvd., Montgomery, Ala., for inspection and repairs. The authorized Ford dealership replaced the steering gear under warranty and paid the tow bill from the scene of the accident to their shop. A copy of the warranty repair is attached for your review.

Contact was made with Ford Consumer Affairs through the dealership on August 13, 2007. A Ms. Alma Taylor informed us that since Ford Consumer Affairs was not given an opportunity to inspect the vehicle prior to repairs being accomplished, that all claims would have to be referred to your office for handling.

As previously mentioned, when the steering gear failed the truck could not be controlled by the driver which resulted in an impact with a chain-link fence. The [REDACTED] accomplished repairs to the truck in question in our City-owned body shop. The body repairs totaled \$499.27. A copy of the repair work orders and material receipts are attached for your review.

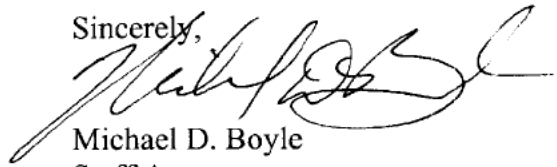
Repairs to the chain-link fence, having been repaired by the [REDACTED] total \$295.71. A copy of labor and materials email is attached for your review.

By copy of this letter, the [REDACTED] is presenting Ford Motor Company with a claim for damages totaling \$794.98. As mentioned above, it is the contention of the City of Montgomery that the automobile physical damage and property damage to the chain-link fence resulted from the warranted failure of the Ford steering gear assembly.

We are respectfully requesting that you issue a check in the amount of \$794.98, payable to the [REDACTED] and forward the check to the attention of the [REDACTED] [REDACTED] Montgomery, AL [REDACTED]. Please indicate our claim number [REDACTED] in the check.

Thank you for your attention to this matter and please contact me or my law clerk, John Craft, should you have any questions.

Sincerely,



Michael D. Boyle
Staff Attorney

Cc: [REDACTED]

MDB/jcc



PRIVILEGED & CONFIDENTIAL

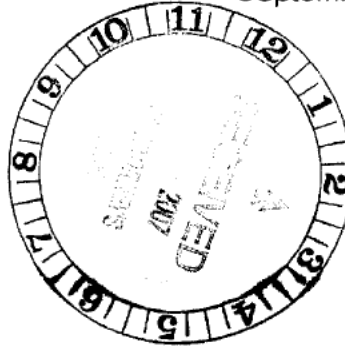
Office of the General Counsel

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

September 26, 2007

Montgomery, A
ATTENTION:

RE: Your Insured: [REDACTED]
Your Claim #: 2007-257
DOL: July 12, 2007



Dear Mr. Boyle:

We acknowledge your recently submitted subrogation claim letter dated August 31, 2007. In order to assist us in evaluating your claim, we request that you provide us with the following information (Please note that the information requested is in regard to the Ford manufactured vehicle.)

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

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

- 9. What was the city and state of occurrence: Montgomery, Alabama
- 10. The 17 digit vehicle identification number: 1FDWW36Y76E [REDACTED]
- 11. What was the mileage at time of occurrence: 15,286
- 12. What is the alleged defect: Steering system failure
- 13. Has the alleged defective part been repaired or replaced? (circle one) Yes or No

By Montgomery Ford LM, under warranty

14. What is the current location of the vehicle, and the alleged defective part(s)?
In service, Montgomery, Alabama
15. List all after market additions or modifications that were made to the vehicle:
None
16. Was the engine running? (circle one) Yes or No
17. Were the keys in the ignition? (circle one) Yes or No
18. Was this vehicle purchased new or used: New
If purchased used, provide the date of purchase, mileage at the time of purchase, and from whom the vehicle was purchased: _____

Once we are in receipt of the requested information, it will be reviewed and you will be notified of our decision concerning your claim. Should you not send all of the requested information and materials within 90 days, we will assume that you are not interested in pursuing a claim and we will close our file. Please note that your vehicle will not be inspected until all the above information has been submitted and a determination has been made as to whether an inspection is warranted.

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

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

Sincerely,



Micki Lynn
Claims Analyst

All Action Details for Issue

[Print](#)

VIN: 1FDWW36Y76E [REDACTED] Year: 2006 Model: F-SERIES SUPER DUTY Case: [REDACTED]
 Name: [REDACTED] Owner Status: Original WSD: 2006-01-30
 Symptom Desc: STRG/HANDLING FUNCTION Primary Phone: [REDACTED]
 Reason Desc: LEGAL - ACCIDENT & PERSONAL/PROPERTY DAMAGE Secondary Phone: [REDACTED]
 Issue Type: 07 LEGAL Issue Status: CLOSED

Action: OPEN LEGAL COANTACT - PRODUCT LIABILITY - ACCIDENT
 Dealer: 06309 MONTGOMERYFORD LINCOLN MERCURY Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION
 Odometer: 15286 MI Comm Type: INBOUND EMAIL-OTHER
 Analyst Name: TAYLOR (ATAYLO29),ALMA Analyst: ATAYLO29
 Action Date: 08/13/2007 Action Time: 09.05.19.313 Action Data: No

Comments **LPA RECEIVED A DEALER REQUEST FOR CONSUMER AFFAIRS REVIEW FORM SUBMITTED BY BART SHAFFER, MONTGOMERY FORD, P/A: 06309, PH: 334 613-5023. ACCORDING TO THE INFORMATION PROVIDED, THIS VEHICLE INVOLVED IN AN ACCIDENT ON 7-12-2007. THIS VEHICLE SUSTAINED DAMAGE TO THE RIGHT FENDER AND DOOR. A CITY PARK CHAIN LINK FENCE WAS ALSO DAMAGED. MONGOMERY FORD COMPLETED STEERING GEAR REPAIRS.

Action: MAKE OUTBOUND CALL TO DEALER
 Dealer: 06309 MONTGOMERYFORD LINCOLN MERCURY Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION
 Odometer: 15286 MI Comm Type: PHONE
 Analyst Name: TAYLOR (ATAYLO29),ALMA Analyst: ATAYLO29
 Action Date: 08/13/2007 Action Time: 09.06.08.476 Action Data: No

Comments **LPA LEFT A VM MSG FOR BART REQUESTING A RETURN PHONE CALL.

Action: DENY ASSISTANCE - REFER TO INSURANCE CARRIER
 Dealer: 06309 MONTGOMERYFORD LINCOLN MERCURY Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION
 Odometer: 15286 MI Comm Type: PHONE
 Analyst Name: TAYLOR (ATAYLO29),ALMA Analyst: ATAYLO29
 Action Date: 08/13/2007 Action Time: 14.00.50.518 Action Data: No

Comments **BART SHAFFER CONFIRMED THAT STEERING GEAR REPAIRS HAD BEEN PERFORMED ON 7-13-2007.---LPA EXPLAINED TO BART AND JOE HICKS, CITY OF MONTGOMERY SAFETY DIRECTOR, THAT SINCE REPAIRS HAVE ALREADY BEEN PERFORMED, LPA IS UNABLE TO INVESTIGATE. LPA SUGGESTED INSURANCE SUBROGATION AS A POSSIBLE OPTION.

Ford Confidential

Montgomery Ford LM
 4000 Eastern Blvd
 Montgomery, AL 36116
 Telephone: (334) 613-5000

SERVICE DEPARTMENT HOURS
 7:00 a.m. to 6:00 p.m.
 Monday - Friday
 8:30 a.m. - 3:30 p.m. - Saturday

RO Open Date	RO Number
7/13/07	6037065/1
RO Close Date	Status
7/31/07	Reprint
Mileage In	Mileage Out
15286	15289
Vehicle Address / Equip	
Steve Morgan/6162	
Vehicle Identification Number	
1FDWW36Y76E	
Delivery Date	In Service Date
1/30/06	1/30/06
Color	License Number
GREEN	

MONTGOMERY, AL			Work Phone	
			Home Phone	
Year	Make	Model	Duty	
2006	FORD	F350	TRUCK	
6G60524				

DESCRIPTION OF SERVICE AND PARTS	AMOUNT
#1 - SUSP. SUSPENSION/BRAKES C/S THE STEERING IS NOT WORKING WILL NOT TURN?? WA S TOWED IN !! Corrected by 3504A: (H22) (42) STEERING GEAR ASSEMBLY - REMOVE AND INSTALL OR REP LACE (3504) - L Work performed by Mitch Cameron (467) Warranty Corrected by 14056D: AIR BAG RESTRAINT SYSTEM - DIAGNOSIS - L Work performed by Mitch Cameron (467) Warranty Corrected by 14056D6: CONTACT ASSEMBLY-AIR BAG SLIDING - REPLACE (14A664) - L Work performed by Mitch Cameron (467) Warranty fuel/freight surchar Installed 7C3Z 3504 A (FP):GEAR ASY - STEERING Qty: 1 Warranty Installed XL 8 :FLUID - POWER ASSISTED STEERIN Qty: 4 Warranty Installed 388898 S :SEAL Qty: 2 Warranty Installed 5C3Z 14A664 BA :COVER AND CONTACT PLATE Qty: 1 Warranty CK STEERING & SUSPENSION FOUND STEERING GEAR INPUT SHAFT AND CLOCK SPRING BROKEN REPLACE STEERING GEAR AND CLOCK SPRING ROAD TEST TO VERIFY REPAIR	
#2 - SUBLET: SUBLET TOW Corrected by TOW: TOWING Work performed by HOUSE TECH (98) Work performed by B-R177 : 51118 Labor: 55.00 Work performed by B-R177 : 51118 Parts:	

TERMS: STRICTLY CASH UNLESS ARRANGEMENTS ARE MADE. I hereby authorize the repair work hereinafter to be done along with the necessary materials and agree that you are not responsible for loss or damage to vehicle or articles left in the vehicle in case of fire, theft, or any other cause beyond your control or for any delays caused by unavailability of parts or delays in parts shipments by the supplier or transporter. I hereby grant you or your employees permission to operate the vehicle herein described on streets, highways, or elsewhere for the purpose of testing and/or inspection. An express mechanic's lien is hereby acknowledged on above vehicle to secure the amount of repairs thereto.

DISCLAIMER OF WARRANTIES. Any warranties on the products sold hereby are those made by the manufacturer. The seller hereby expressly disclaims all warranties either express or implied, including any implied warranty of merchantability or fitness for a particular purpose, and the seller neither warrants nor authorizes any other person to assume for him any liability in connection with the sale of said products. Any limitation contained herein does not apply where prohibited by law.

LABOR	
PARTS	
DEDUCTIBLE	
SUBLET	
SHOP SUPPLIES	
HAZARDOUS MATERIALS	
SALES TAX OR TAX I.D.	
SPECIAL ORDER DEPOSIT	
DISCOUNTS	
TOTAL DUE	

NO RETURN ON ELECTRICAL OR SAFETY ITEMS OR SPECIAL ORDERS

X

Standard Claims List For Model Year 2006

Detailed Vehicle Specification

VIN	VEH LINE	MKT DERIV	BODY CAB	VER SERIES	DRIVE TYPE	PLT CD	TRS CD	ENG CD	PROD DATE	WARR DATE	SELLING DEALER	SELL CNT	TIS	WCC	CPSC_6	PREF	BASE	SUFF	CCC	CD	DIST (Miles)		
1FDWW36Y76[REDACTED]	T/F7	F	T/BC	T/CD	T/B	AI	T/TQ	T/YH	20-JAN-2006	30-JAN-2006	121401	USA	18	5001	110201	7C3Z	3504	A	H22	42	15286		
AWS Claim Key:		4096177	Trx Code:		E84	Labor Hrs:		2.5															
Dlr Cd-Sub Cd:		06309 - *	Name:		MONTGOMERY FORD LINCOLN MERCURY, INC.			Ph:	334-6135000		St:	AL	Ctry Cd:	USA		Reg Cd:	NA		Repr Date:	13-JUL-2007		Doc #:	03706501
Cust Comments:		SUSPENSION/BRAKES C/S THE STEERING IS NOT WORKING WILL NOT TURN?? WAS TOWED IN																					
Tech Comments:		CK STEERING & SUSPENSION FOUND STEERING GEAR INPUT SHAFT AND CLOCK SPRING BROKEN REPLACE STEERING GEAR AND CLOCK SPRING ROAD TEST TO VERIFY REPAIR																					

Claim Detail Report

Model Year = 2006 Claim Key = 4096177

Vehicle Information

Model Year: 2006

Market Derived: F - FORD

Body/Cab Type: T/BC - DOUBLE CAB (CREW CAB)

Version/Series: T/CD-350 SERIES

Drive Type: T/B-2 WHL L/H REAR DRIVE

Vehicle Line: T/F7-F250HD/350/450/550 [99-08]

Warranty Start Date: 30-JAN-2006

Production Date: 20-JAN-2006

VIN: 1FDWW36Y76 [REDACTED]

Claim Information

Document Number: 03706501

Repair Date: 13-JUL-2007

Distance: 15286

TIS: 18

Dealer Information

Dealer Name MONTGOMERY FORD LINCOLN MERCUR

Dealer Code: 06309 - *

Address: 4000 EASTERN BYPASS

City: MONTGOMERY

State: AL Zip Code:36116

Country: USA Region Code: NA

Phone: (334)500-5000

Cust. Concern Code: H22 - STEERING REQUIRES EXTRA OR UNEVEN EFFORT

Condition Code: 42 - DOES NOT OPERATE PROPERLY

Technician Comment: CK STEERING & SUSPENSION FOUND STEERING GEAR INPUT SHAFT AND CLOCK SPRING BROKEN
REPLACE STEERING GEAR AND CLOCK SPRING ROAD TEST TO VERIFY REPAIR

Customer Comment: SUSPENSION/BRAKES C/S THE STEERING IS NOT WORKING WILL NOT TURN?? WAS TOWED IN

Labor Op Code

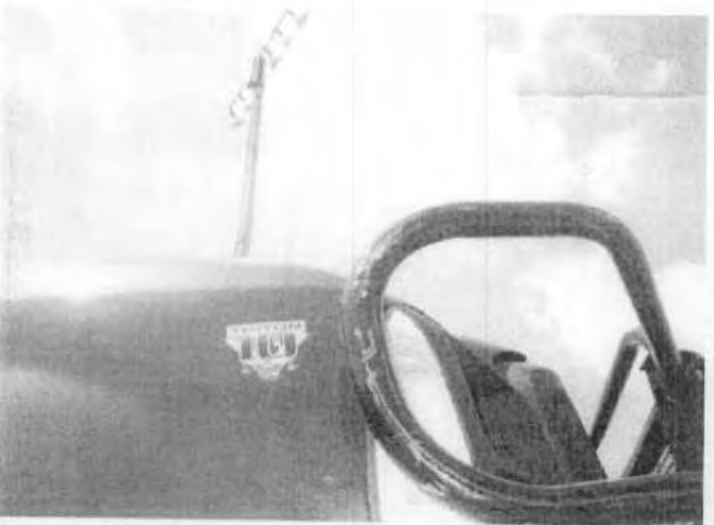
Labor Op Description

3504A STEERING GEAR ASSEMBLY REMOVE AND INSTALL OR REPLACE

14056D AIR BAG RESTRAINT SYSTEM DIAGNOSIS
14056D6 CONTACT ASSEMBLY - AIR BAG SLIDING REPLACE

Causal	Full Part Number			Part	Part	
Flag	PREF	BASE	SUFF	Description	CPSC	Quantity
Y	7C3Z	3504	A	GEAR ASY-STEERING	110201	1
N	XL	8	*	MOTORCRAFT BATTERY	000057	4
N	*	388898	S		110201	2
N	5C3Z	14A664	BA	AIR BAG CLOCK SPRING	110603	1

SEATING	Other Involved Unit (Circle One)				Other Involved Unit (Circle One)				CODES																																																		
	1	2	3	10	1	2	3	10	SAFETY EQUIPMENT																																																		
1	42	42			N/A				81 - None Involved 89 - Not Applicable 90 - Unknown (Any Type)																																																		
									91 - Lap Belts Only 92 - Not Fastened 93 - Lap/Shoulder Harness 94 - Lap Only Used 95 - Not Used 96 - Shoulder Only Used 97 - Both Used 98 - Monoridge Harness 99 - None Used 100 - Used																																																		
VICTIMS	Name _____ Address _____								Unit No.	Seat Pos.	Injury Type	Age	Sex	Eggs	First Aid By																																												
N/A	Name _____ Address _____																																																										
CODES	Injury Type		Ejected		First Aid By																																																						
	K - Killed B - Bruise/Abraham/Striking C - Not Visible—Has Pain/Faint		A - Visible or Carried from Scene B - Not Visible—Has Pain/Faint		H - Not Fully Paralyzed I - Trapped J - Unknown K - Not Applicable		A - Ambulance Attended D - Doctor		M - Paramedic O - Other		P - Police U - Unknown N - None		Child Restraints 01 - Child Restraint Used 02 - Unknown Restraint Used 03 - None Used Pedal Cycle/Pedestrian 01 - Containing Clothing 02 - Non-containing Clothing																																														
NARRATIVE AND DIAGRAM	<p>Buckley Watson Ball Field</p> <p>DRIVER of vehicle #1 stated he was moving slowly past a light pole, stopped right to change the pole & when he stopped left the vehicle continue straight & collided into the chain link fence.</p>																																																										
ROADWAY ENVIRONMENT	<table border="1"> <thead> <tr> <th>Unit 1</th> <th>Contributing Road Defects</th> <th>Surface Construction</th> <th>Condition</th> <th>Accident Related To Road Construction Zone?</th> <th>Material to Roadway (Contributing)</th> <th>Material Source</th> <th>Character</th> </tr> </thead> <tbody> <tr> <td>N/A</td> <td>4 - None</td> <td>1 - Asphalt</td> <td>1 - Dry</td> <td>No</td> <td>1 - None</td> <td>1 - Not Applicable</td> <td>1 - Straight—Spout</td> </tr> <tr> <td>N/A</td> <td>1 - Shoulders Low</td> <td>2 - Concrete</td> <td>2 - Wet</td> <td>Yes</td> <td>2 - Rocks</td> <td>2 - Natural Environment</td> <td>2 - Straight—Down Grade</td> </tr> <tr> <td>N/A</td> <td>2 - Shoulders High</td> <td>3 - Brick</td> <td>3 - Icy</td> <td>No</td> <td>3 - Trees/Limbs</td> <td>3 - Dropped From Vehicle</td> <td>3 - Straight—Up Grade</td> </tr> <tr> <td>N/A</td> <td>3 - Holes, Bumps, Etc.</td> <td>4 - Unpaved</td> <td>4 - Slippy/Slus</td> <td>Yes</td> <td>4 - Dirt</td> <td>4 - Already in Road, But Fell From Vehicle</td> <td>4 - Straight—Hillcrest</td> </tr> <tr> <td>N/A</td> <td>8 - Other</td> <td>8 - Other</td> <td>8 - Other</td> <td>No</td> <td></td> <td>8 - Other</td> <td>5 - Curve—Level</td> </tr> </tbody> </table>											Unit 1	Contributing Road Defects	Surface Construction	Condition	Accident Related To Road Construction Zone?	Material to Roadway (Contributing)	Material Source	Character	N/A	4 - None	1 - Asphalt	1 - Dry	No	1 - None	1 - Not Applicable	1 - Straight—Spout	N/A	1 - Shoulders Low	2 - Concrete	2 - Wet	Yes	2 - Rocks	2 - Natural Environment	2 - Straight—Down Grade	N/A	2 - Shoulders High	3 - Brick	3 - Icy	No	3 - Trees/Limbs	3 - Dropped From Vehicle	3 - Straight—Up Grade	N/A	3 - Holes, Bumps, Etc.	4 - Unpaved	4 - Slippy/Slus	Yes	4 - Dirt	4 - Already in Road, But Fell From Vehicle	4 - Straight—Hillcrest	N/A	8 - Other	8 - Other	8 - Other	No		8 - Other	5 - Curve—Level
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N/A	3 - Holes, Bumps, Etc.	4 - Unpaved	4 - Slippy/Slus	Yes	4 - Dirt	4 - Already in Road, But Fell From Vehicle	4 - Straight—Hillcrest																																																				
N/A	8 - Other	8 - Other	8 - Other	No		8 - Other	5 - Curve—Level																																																				
INVESTIGATION	<table border="1"> <thead> <tr> <th>Light</th> <th>Weather</th> <th>Locale</th> <th>Non-Vehicular Property Damage</th> <th>Property Damage Description</th> </tr> </thead> <tbody> <tr> <td>1 - Daylight</td> <td>1 - Clear</td> <td>1 - Open Country</td> <td>1 - None Visible</td> <td>CHAIN LINK FENCE</td> </tr> <tr> <td>2 - Dawn</td> <td>2 - Cloudy</td> <td>2 - Residential</td> <td>2 - Moderate</td> <td>City of Montgomery</td> </tr> <tr> <td>3 - Dusk</td> <td>3 - Rain</td> <td>3 - Shop/yr Business</td> <td>3 - Severe</td> <td>1400 LAKE ST</td> </tr> <tr> <td>4 - Darkness—Road Not Lit</td> <td>4 - Snow</td> <td>4 - Mtg. or Industrial</td> <td></td> <td></td> </tr> </tbody> </table>											Light	Weather	Locale	Non-Vehicular Property Damage	Property Damage Description	1 - Daylight	1 - Clear	1 - Open Country	1 - None Visible	CHAIN LINK FENCE	2 - Dawn	2 - Cloudy	2 - Residential	2 - Moderate	City of Montgomery	3 - Dusk	3 - Rain	3 - Shop/yr Business	3 - Severe	1400 LAKE ST	4 - Darkness—Road Not Lit	4 - Snow	4 - Mtg. or Industrial																									
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	<p>05/12/07</p>																																																										





Safeco Insurance Company of Illinois
Central Region Claims
3637 South Geyer Road
Sunset Hills, MO 63127

Mailing Address
P.O. Box 461
St. Louis, MO 63166

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



RECEIVED
JUL 20 2006

July 18, 2006

General Council
Three Parklane Blvd,
Parklane Towers West Office300
Dearborn, MO 48126

Insured Name: [REDACTED]
Policy Number [REDACTED]
Loss Date: May 31, 2006
Claim Number [REDACTED]

Dear Mr. [REDACTED]

This letter is in regards to our insured [REDACTED] 2006 Ford F250. On May 24th of 2006 our insured [REDACTED] purchased his 2006 Ford F250 from Joe Machen Ford. Our insured was driving his vehicle on 05/31/06 and the steering gear box went out causing our insured to loss control of his vehicle and go into a ditch which caused body damage to his vehicle. Safeco sent Centro Inspection out to view Mr. [REDACTED] 006 Ford F250 completed an inspection. Centro Inspection confirmed that there was internal failure /Defect of the steering gear box causing loss of control and collision damages to the 2006 Ford F250. Joe Machen Ford is stating that we need to fax a letter to Shawn Morton so he can send an Engineer out to view Mr. [REDACTED] vehicle. Please contact Mr. [REDACTED] to make arrangements to inspect his vehicle. Also contact Betty Malone at 636-825-8125 to discuss. Vin number 1F15X21P26F [REDACTED]

Sincerely,

Betty Malone
Betty Malone
Central Region Claims
Safeco Insurance Company of Illinois
(800) 332-3226 Ext: 58125
(800) 332-3226 Fax: (888) 268-8840
betmal@safeco.com

SPACE USED FOR BARCODE	AGENCY NAME AND ORI MISSOURI STATE HIGHWAY PATROL MOMHPBB00
------------------------	---

LEFT THE SCENE <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	CLEARED <input type="checkbox"/> YES <input type="checkbox"/> NO	ACCIDENT CLASSIFICATION PROPERTY DAMAGE ONLY <input checked="" type="checkbox"/>	NUMBER INJURED 0	NUMBER KILLED 0	REPORT / CASE / INCIDENT NUMBER [REDACTED]
NUMBER OF VEHICLES INVOLVED 1	ACCIDENT DATE [REDACTED]	ACCIDENT TIME (MIL.) 1715	TIME NOTIFIED (MIL.) 1749	TIME ARRIVED (MIL.) 1811	INVESTIGATION DATE 05/31/2006

2 - LOCATION

COUNTY Knox	MO 052	MUNICIPALITY Non-City Or Unincorporated	9999	BEAT / ZONE 07	TWP / DIST / PCT B	INVESTIGATED AT SCENE <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
ON RT E	DISTANCE FROM FEET	LOCATION <input type="checkbox"/> AFTER <input checked="" type="checkbox"/> BEFORE <input type="checkbox"/> AT	INTERSECTING STREET OR ROADWAY MO 156 (W)	SPEED LIMIT 55	GEO - CODE NA	GPS W LONGITUDE 091 59 21.8
ROADWAY DIRECTION S	SPEED LIMIT 55	0.6 MILES	SPEED LIMIT NA	GEO - CODE NA	GPS N LATITUDE 040 00 00.9	
ROAD MAINTAINED BY: <input checked="" type="checkbox"/> 1. STATE <input type="checkbox"/> 2. COUNTY <input type="checkbox"/> 3. MUNICIPAL <input type="checkbox"/> 4. PRIVATE PROPERTY <input type="checkbox"/> 5. OTHER						DAMAGE TO PROPERTY OTHER THAN VEHICLES <input type="checkbox"/> NONE

3 - DAMAGE TO PROPERTY OTHER THAN VEHICLES

GIVE OWNER'S NAME AND ADDRESS, DESCRIPTION OF PROPERTY, AND DAMAGE
 MOPOT [REDACTED] **Knox City, MO** [REDACTED] **30 feet of fence; fence destroyed**

DRIVER'S FULL NAME (LAST, FIRST, MI) [REDACTED] ADDRESS (STREET, CITY, STATE, ZIP) [REDACTED]

DRIVER 1

DRIVER LICENSE NUMBER / ID NUMBER [REDACTED]	STATE MO	TYPE OF LICENSE <input checked="" type="checkbox"/> 1. OPERATOR CLASS R <input type="checkbox"/> 2. CDL CLASS	<input type="checkbox"/> 3. PERMIT <input type="checkbox"/> 4. UNLICENSED <input type="checkbox"/> 5. MC ONLY <input type="checkbox"/> UNKNOWN	MC ENDORSEMENT <input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA
PROOF OF INSURANCE <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> NOT REQUIRED	INSURANCE COMPANY Hawkins Insurance Group	<input type="checkbox"/> DRIVER <input checked="" type="checkbox"/> VEHICLE	POLICY NUMBER [REDACTED]	

VEHICLE 1

YEAR 2006	MAKE Ford	MODEL F250	COLOR Black
LIC. PLATE NO. NONE	STATE MO	YEAR NA	VIN 1FTSX21P26E [REDACTED]
VEHICLE OWNER NAME (LAST, FIRST, MI) / COMMERCIAL CARRIER [REDACTED] Newark, MO		ADDRESS (STREET, CITY, STATE, ZIP) <input checked="" type="checkbox"/> SAME AS DRIVER	

VEHICLE DAMAGE (Circle all damaged areas)

<input type="checkbox"/> NONE	INITIAL IMPACT NO. <input type="checkbox"/> NA 2	<table border="1" style="width:100%; text-align: center;"> <tr><td>3</td><td>4</td><td>5</td><td>6</td><td>7</td></tr> <tr><td>15</td><td>16</td><td>17</td><td>8</td><td>9</td></tr> <tr><td>14</td><td>13</td><td>12</td><td>11</td><td>10</td></tr> </table>	3	4	5	6	7	15	16	17	8	9	14	13	12	11	10	18 - Undercarriage 19 - Windshield 20 - Burned 21 - Towed Unit 22 - Cargo <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	TOWED FROM SCENE <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	TOW CO. INFORMATION Morgrett's (Request), Edina, MO
3	4	5	6	7																
15	16	17	8	9																
14	13	12	11	10																

DRIVER 2

DRIVER'S FULL NAME (LAST, FIRST, MI) [REDACTED]	ADDRESS (STREET, CITY, STATE, ZIP) [REDACTED]
DRIVERS LICENSE NUMBER / ID NUMBER [REDACTED]	STATE [REDACTED]
TYPE OF LICENSE <input type="checkbox"/> 1. OPERATOR CLASS <input type="checkbox"/> 2. CDL CLASS	<input type="checkbox"/> 3. PERMIT <input type="checkbox"/> 4. UNLICENSED <input type="checkbox"/> 5. MC ONLY <input type="checkbox"/> UNKNOWN
MC ENDORSEMENT <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> NA	
PROOF OF INSURANCE <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> NOT REQUIRED	INSURANCE COMPANY [REDACTED]
<input type="checkbox"/> DRIVER <input type="checkbox"/> VEHICLE	POLICY NUMBER [REDACTED]

VEHICLE 2

YEAR [REDACTED]	MAKE [REDACTED]	MODEL [REDACTED]	COLOR [REDACTED]
LIC. PLATE NO. [REDACTED]	STATE [REDACTED]	YEAR [REDACTED]	VIN [REDACTED]
VEHICLE OWNER NAME (LAST, FIRST, MI) / COMMERCIAL CARRIER [REDACTED]		ADDRESS (STREET, CITY, STATE, ZIP) <input type="checkbox"/> SAME AS DRIVER	

VEHICLE DAMAGE (Circle all damaged areas)

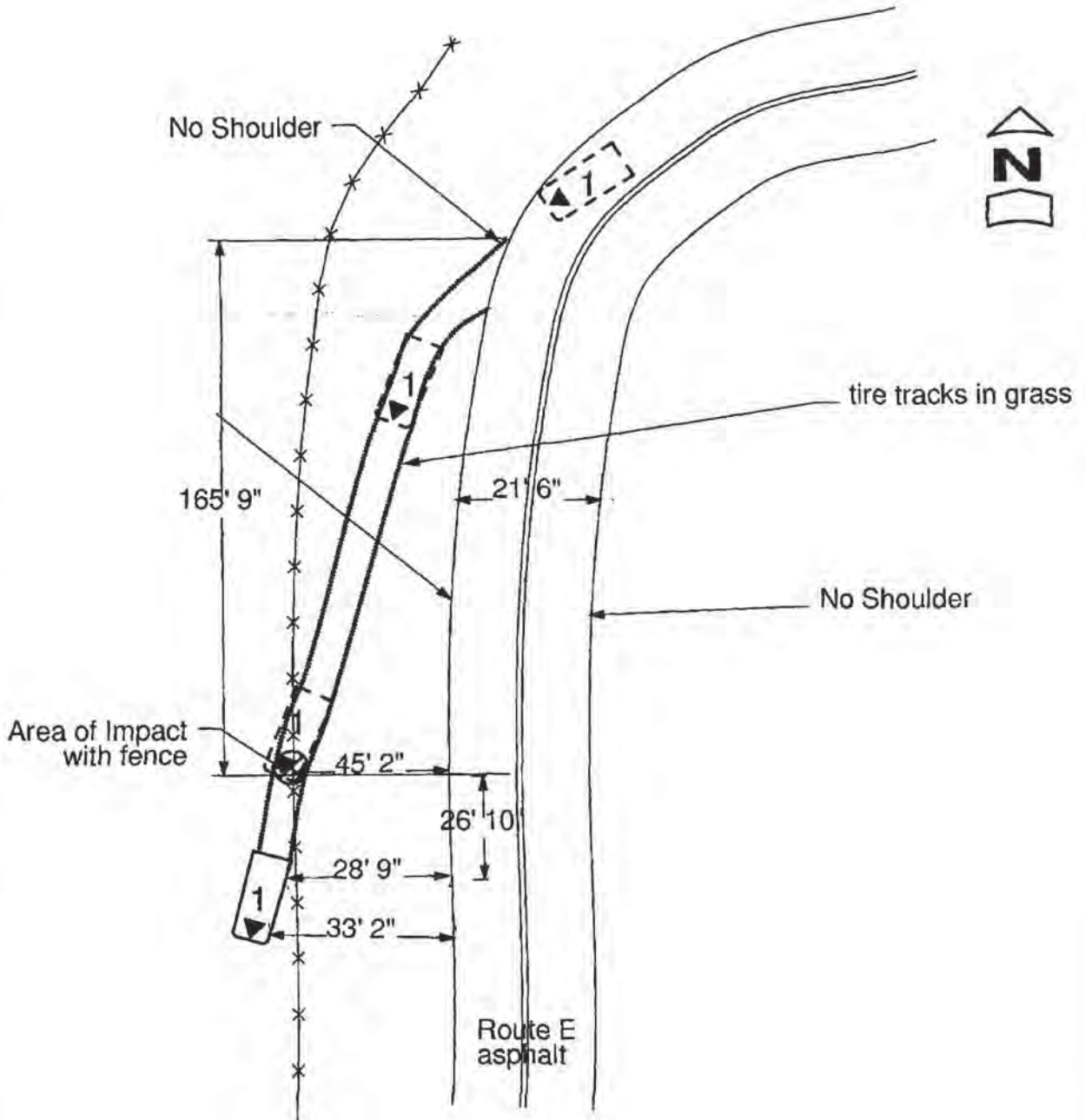
<input type="checkbox"/> NONE	INITIAL IMPACT NO. <input type="checkbox"/> NA	<table border="1" style="width:100%; text-align: center;"> <tr><td>2</td><td>3</td><td>4</td><td>5</td><td>6</td><td>7</td></tr> <tr><td>1</td><td>15</td><td>16</td><td>17</td><td>8</td><td>9</td></tr> <tr><td>14</td><td>13</td><td>12</td><td>11</td><td>10</td><td>8</td></tr> </table>	2	3	4	5	6	7	1	15	16	17	8	9	14	13	12	11	10	8	18 - Undercarriage 19 - Windshield 20 - Burned 21 - Towed Unit 22 - Cargo <input type="checkbox"/> YES <input type="checkbox"/> NO	TOWED FROM SCENE <input type="checkbox"/> YES <input type="checkbox"/> NO	TOW CO. INFORMATION
2	3	4	5	6	7																		
1	15	16	17	8	9																		
14	13	12	11	10	8																		

6 - WITNESS NONE IDENTIFIED

NAME OF WITNESS	ADDRESS (STREET, CITY, STATE, ZIP)	TELEPHONE NO.
NA		
NA		
NA		
NA		

7. COLLISION DIAGRAM Direction Prior to Impact (circle one) V1 NE **SW** V2 NESW V3 NESW V4 NESW Est. Speed - Fatals Only V1 NA V2 NA V3 NA V4 NA

INDICATE NORTH



INDICATE ROAD NAMES

REQUIRED UNLESS DELAYED REPORT

DIAGRAM NOT TO SCALE

8. EVIDENTIARY PHOTOS TAKEN

YES NO BY WHOM NA

AVAILABLE FROM NA

RECONSTRUCTION - Includes Narrative, Diagram, & Photo(s)

YES NO BY WHOM NA

9 - CODES		INJURY	TRANSPORTED (Medical Treatment)	EJECTION	AIR BAG FRONT	AIR BAG SIDE	SAFETY DEVICES										
SEAT LOCATION	<table border="1"> <tr><td>FR</td><td>SR</td><td>TR</td></tr> <tr><td>FC</td><td>SC</td><td>TC</td></tr> <tr><td>FL</td><td>SL</td><td>TL</td></tr> </table>	FR	SR	TR	FC	SC	TC	FL	SL	TL	1. Fatal 2. Disabling 3. Evident - Not Disabling 4. Probable - Not Apparent 5. None Apparent 6. Unknown	1. No 2. EMS 3. Other 4. Unknown	1. NA 2. No 3. Partially 4. Totally 5. Unknown	1. None / NA 2. Deployed 3. Not Deployed	1. None / NA 2. Deployed 3. Not Deployed	1. None 2. Not Used 3. Shoulder Belt Only 4. Lap Belt Only 5. Shoulder and Lap Belt 6. Child Restraint	7. Helmet Used 8. Helmet Not Used 9. Use Unknown
FR	SR	TR															
FC	SC	TC															
FL	SL	TL															

10 - DRIVERS												
NAME		DATE OF BIRTH	SEX	VEH. NO.	SEAT LOC.	INJ.	TRANS-PORT	EJEC-TION	AIR BAG F	AIR BAG S	SAF DEV	TELEPHONE NO.
<input type="checkbox"/> NA	DRIVER 1 - SAME ADDRESS AS ABOVE		M	1	FL	5	1	2	3	1	5	
<input checked="" type="checkbox"/> NA	DRIVER 2 - SAME ADDRESS AS ABOVE											

11 - OTHER OCCUPANTS & PEDESTRIANS (SAD = SAME AS DRIVER)											
NA											
NA											
NA											
NA											
NA											
NA											

12. VEHICLE BODY TYPES AUTOMOBILES/SPECIAL VEHICLES	
<input type="checkbox"/> V1	<input type="checkbox"/> V2
<input type="checkbox"/>	1. Passenger Car
<input type="checkbox"/>	2. Station Wagon
<input type="checkbox"/>	3. Sport Utility Vehicle
<input type="checkbox"/>	4. Limousine (6-15 for hire)
<input type="checkbox"/>	5. Van (8 or less with driver)
<input type="checkbox"/>	6. Small Bus (9-15 with driver)
<input type="checkbox"/>	7. Bus (16 or more with driver)
<input type="checkbox"/>	8. School Bus (less than 16 with driver)
<input type="checkbox"/>	9. School Bus (16 or more with driver)
<input type="checkbox"/>	10. Motorcycle
<input type="checkbox"/>	11. ATV
<input type="checkbox"/>	12. Motorized Bicycle
<input type="checkbox"/>	13. Pedalcycle
<input type="checkbox"/>	14. Motor Home / Camper
<input type="checkbox"/>	15. Farm Implements
<input type="checkbox"/>	16. Construction Equipment
<input type="checkbox"/>	17. Other Transport Device
<input type="checkbox"/>	18. Unknown
<input checked="" type="checkbox"/>	19. Pick-up
<input type="checkbox"/>	20. Single-unit Truck: 2 axles, 6 tires
<input type="checkbox"/>	21. Single-unit Truck: 3 or more axles
<input type="checkbox"/>	A. Vehicle Pulling Another Unit(s) 1-21 only
<input type="checkbox"/>	22. Truck Tractor With No Units
<input type="checkbox"/>	23. Truck Tractor With One Unit
<input type="checkbox"/>	24. Truck Tractor With Two Units
<input type="checkbox"/>	25. Truck Tractor With Three Units
<input type="checkbox"/>	26. Other Heavy Truck
GCWV Rating (not licensed weight) 19-26 only	
<input checked="" type="checkbox"/>	<input type="checkbox"/> Less than or equal to 10,000 lbs.
<input type="checkbox"/>	<input type="checkbox"/> 10,001 - 26,000 lbs.
<input type="checkbox"/>	<input type="checkbox"/> Greater than 26,000 lbs.

14. HAZARDOUS MATERIALS	
<input checked="" type="checkbox"/> V1	<input checked="" type="checkbox"/> V2
<input type="checkbox"/>	<input type="checkbox"/> Placard Displayed
<input type="checkbox"/>	<input type="checkbox"/> 1. Gases in Bulk
<input type="checkbox"/>	<input type="checkbox"/> 2. Solids in Bulk
<input type="checkbox"/>	<input type="checkbox"/> 3. Liquids in Bulk
<input type="checkbox"/>	<input type="checkbox"/> 4. Explosives
<input type="checkbox"/>	<input type="checkbox"/> 5. None
<input type="checkbox"/>	A. Hazardous Materials' Cargo Released / Spilled
15. ACCIDENT TYPE	
<input type="checkbox"/>	1. On Roadway
<input checked="" type="checkbox"/>	2. Off Roadway
COLLISION INVOLVING	
<input type="checkbox"/>	1. Animal
<input type="checkbox"/>	2. Pedalcycle
<input checked="" type="checkbox"/>	3. Fixed Object
<input type="checkbox"/>	4. Other Object
<input type="checkbox"/>	5. Pedestrian
<input type="checkbox"/>	6. Train
<input type="checkbox"/>	7. MV in Transport
<input type="checkbox"/>	8. MV on Other Roadway
<input type="checkbox"/>	9. Parked MV
NON-COLLISION	
<input type="checkbox"/>	10. Overturning
<input type="checkbox"/>	11. Other Non-Collision
TWO VEHICLE COLLISION	
<input type="checkbox"/>	60. Head On
<input type="checkbox"/>	61. Rear End
<input type="checkbox"/>	62. Sideswipe - Meeting
<input type="checkbox"/>	63. Sideswipe - Passing
<input type="checkbox"/>	64. Angle
<input type="checkbox"/>	65. Backed Into
<input type="checkbox"/>	67. Other

17. VEHICLE ACTION / SEQUENCE OF EVENTS						
<input type="checkbox"/>	1. Going Straight					
<input type="checkbox"/>	2. Overtaking					
<input type="checkbox"/>	3. Making Right Turn					
<input type="checkbox"/>	4. Right Turn on Red					
<input type="checkbox"/>	5. Making Left Turn					
<input type="checkbox"/>	6. Making U Turn					
<input type="checkbox"/>	7. Skidding / Sliding					
<input type="checkbox"/>	8. Slowing / Stopping					
<input type="checkbox"/>	9. Start in Traffic					
<input type="checkbox"/>	10. Start From Parked					
<input type="checkbox"/>	11. Backing					
<input type="checkbox"/>	12. Stopped in Traffic					
<input type="checkbox"/>	13. Parked					
<input type="checkbox"/>	14. Changing Lanes					
<input type="checkbox"/>	15. Avoiding					
<input type="checkbox"/>	16. Crossover Median					
<input type="checkbox"/>	17. Crossover Centerline					
<input type="checkbox"/>	18. Crossing Road					
<input type="checkbox"/>	19. Airborne					
<input type="checkbox"/>	20. Ran Off Road - Right					
<input type="checkbox"/>	21. Ran Off Road - Left					
<input type="checkbox"/>	22. Overtum / Rollover					
<input type="checkbox"/>	23. Fire / Explosion					
<input type="checkbox"/>	24. Immersion					
<input type="checkbox"/>	25. Jackknife					
<input type="checkbox"/>	26. Cargo Loss / Shift					
<input type="checkbox"/>	27. Equipment Failure					
<input type="checkbox"/>	28. Separation of Units					
<input type="checkbox"/>	29. Returned to Road					
<input type="checkbox"/>	30. Collision Inv. Pedestrian					
<input type="checkbox"/>	31. Collision Inv. Pedalcycle					
<input type="checkbox"/>	32. Collision Inv. Train					
<input type="checkbox"/>	33. Collision Inv. Animal (enter code - explain)					
<input type="checkbox"/>	34. Collision Inv. MV in Transport					
<input type="checkbox"/>	35. Collision Inv. Parked Motor Vehicle					
<input type="checkbox"/>	36. Collision Inv. Fixed Object (enter code - explain)					
<input type="checkbox"/>	37. Collision Inv. Other Object (explain)					
<input type="checkbox"/>	38. Other - Non Collision					
V1 <input type="checkbox"/> Unknown						
01	27	20	36	NA	NA	NA
33. Animal Code NA						
36. Fixed Object Code 24 NA NA						
V2 <input type="checkbox"/> Unknown						
NA	NA	NA	NA	NA	NA	NA
33. Animal Code NA						
36. Fixed Object Code NA NA NA						

13. EMERGENCY VEHICLE INVOLVEMENT	
<input type="checkbox"/> V1	<input checked="" type="checkbox"/> V2
<input type="checkbox"/>	1. Police
<input type="checkbox"/>	2. Fire
<input type="checkbox"/>	3. Ambulance
<input type="checkbox"/>	4. Other (must check "A")
<input type="checkbox"/>	A. Emergency Vehicle on Emergency Run
16. TRAFFIC CONDITIONS	
<input checked="" type="checkbox"/> V1	<input type="checkbox"/> V2
<input checked="" type="checkbox"/>	1. Normal
<input type="checkbox"/>	2. Accident Ahead
<input type="checkbox"/>	3. Congestion Ahead

Animal, Fixed Object, and Inattention Codes explained in narrative.

18. PROBABLE CONTRIBUTING CIRCUMSTANCES V1 V2 <input checked="" type="checkbox"/> 1. Vehicle Defects (explain) <input type="checkbox"/> 2. Traffic Control Inoperable or Missing <input type="checkbox"/> 3. Improperly Stopped on Roadway <input type="checkbox"/> 4. Speed - Exceeded Limit <input type="checkbox"/> 5. Too Fast for Conditions <input type="checkbox"/> 6. Improper Passing <input type="checkbox"/> 7. Violation Signal / Sign <input type="checkbox"/> 8. Wrong Side (not passing) <input type="checkbox"/> 9. Following Too Close <input type="checkbox"/> 10. Improper Signal <input type="checkbox"/> 11. Improper Backing <input type="checkbox"/> 12. Improper Turn <input type="checkbox"/> 13. Improper Lane Usage / Change <input type="checkbox"/> 14. Wrong Way (One-Way) <input type="checkbox"/> 15. Improper Start From Park P1 P2 <input type="checkbox"/> 16. Improperly Parked <input type="checkbox"/> 17. Failed to Yield <input type="checkbox"/> 18. Alcohol <input type="checkbox"/> 19. Drugs <input type="checkbox"/> 20. Physical Impairment (explain) <input type="checkbox"/> 21. Inattention (explain) P1 P2 V1 V2 <input type="checkbox"/> 22. None	19. PEDESTRIAN INVOLVEMENT P1 P2 <input checked="" type="checkbox"/> NA <input type="checkbox"/> 1. At Intersection <input type="checkbox"/> 2. Not At Intersection CROSSING ROAD <input type="checkbox"/> 3. With Signal <input type="checkbox"/> 4. Against Signal <input type="checkbox"/> 5. No Signal <input type="checkbox"/> 6. Diagonally <input type="checkbox"/> 7. Within Crosswalk <input type="checkbox"/> 8. Within Marked Crosswalk <input type="checkbox"/> 9. Behind / In Front of Parked Car <input type="checkbox"/> 10. With Traffic <input type="checkbox"/> 11. Against Traffic <input type="checkbox"/> 12. Getting On / Off Vehicle <input type="checkbox"/> 13. Standing / Lying / Sitting on Road <input type="checkbox"/> 14. Pushing / Working on Vehicle <input type="checkbox"/> 15. Other Working <input type="checkbox"/> 16. Playing on Road <input type="checkbox"/> 17. Off Roadway 26. ROAD SURFACE <input type="checkbox"/> 1. Concrete <input type="checkbox"/> 3. Brick <input type="checkbox"/> 5. Dirt / Sand <input checked="" type="checkbox"/> 2. Asphalt <input type="checkbox"/> 4. Gravel <input type="checkbox"/> 6. Multi-Surface	20. VISION OBSCURED V1 V2 <input type="checkbox"/> 1. Windshield <input type="checkbox"/> 2. Load on Vehicle <input type="checkbox"/> 3. Trees / Brush <input type="checkbox"/> 4. Building <input type="checkbox"/> 5. Embankment <input type="checkbox"/> 6. Signboards <input type="checkbox"/> 7. Hillcrest <input type="checkbox"/> 8. Parked Cars <input type="checkbox"/> 9. Moving Cars <input type="checkbox"/> 10. Glare <input checked="" type="checkbox"/> 11. Other (explain) <input type="checkbox"/> 12. Not Obscured 23. LIGHT CONDITION <input checked="" type="checkbox"/> 1. Daylight <input type="checkbox"/> 2. Dark with Street Lights On <input type="checkbox"/> 3. Dark with Street Lights Off <input type="checkbox"/> 4. Dark - No Street Lights <input type="checkbox"/> 5. Indeterminate (explain)	21. TRAFFIC CONTROL V1 V2 <input type="checkbox"/> 1. Construction Zone <input type="checkbox"/> 2. Other Work Zone <input type="checkbox"/> 3. School Zone <input type="checkbox"/> 4. Stop Sign <input type="checkbox"/> 5. Electric Signal <input type="checkbox"/> 6. RR Signal / Gate <input type="checkbox"/> 7. Yield Sign <input type="checkbox"/> 8. Officer / Flagman <input checked="" type="checkbox"/> 9. No Passing Zone <input type="checkbox"/> 10. Turn Restricted <input type="checkbox"/> 11. Signal on School Bus <input type="checkbox"/> 12. None 24. WEATHER CONDITION <input type="checkbox"/> 1. Clear <input checked="" type="checkbox"/> 2. Cloudy <input type="checkbox"/> 3. Rain <input type="checkbox"/> 4. Snow <input type="checkbox"/> 5. Sleet <input type="checkbox"/> 6. Freezing (temp.) <input type="checkbox"/> 7. Fog / Mist <input type="checkbox"/> 8. Indeterminate (explain) 25. ROAD CONDITION <input type="checkbox"/> 1. Dry <input checked="" type="checkbox"/> 2. Wet <input type="checkbox"/> 3. Snow <input type="checkbox"/> 4. Ice <input type="checkbox"/> 5. Slush <input type="checkbox"/> 6. Mud <input type="checkbox"/> 7. Standing Water <input type="checkbox"/> 8. Moving Water <input type="checkbox"/> 9. Other (explain)
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27 - COMMERCIAL MOTOR VEHICLE (Complete for each commercial vehicle involved.)

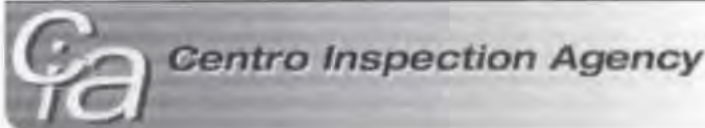
A. CMV CRITERIA Answer the following to determine if this section should be completed. 1. Does this accident involve any of the following: 1.a person fatally injured; or 2.a person transported for medical attention; or 3.a vehicle towed from the scene of the accident <input type="checkbox"/> NO - DO NOT COMPLETE <input checked="" type="checkbox"/> YES - GO TO NUMBER 2 2. Examine each vehicle to determine if it is a commercial vehicle based on the following: 1.a truck with GCWWR of more than 10,000 lbs. and engaged in commerce; or 2.a bus or school bus (9 or more including driver); or 3.a vehicle with a hazardous materials placard <input checked="" type="checkbox"/> NO - DO NOT COMPLETE <input type="checkbox"/> YES - COMPLETE SECTIONS B - E	B. CARRIER ID NUMBER V1 ICC NO. MC _____ USDOT NO. _____ V2 ICC NO. MC _____ USDOT NO. _____ C. HAZARDOUS MATERIAL PLACARD NUMBER <input type="checkbox"/> NA V1 4-Digit Placard Number from Diamond / Box _____ Number From Bottom of Diamond _____ V2 4-Digit Placard Number from Diamond / Box _____ Number From Bottom of Diamond _____ D. TRAFFICWAY <input type="checkbox"/> 1. Two-Way; Not Divided <input type="checkbox"/> 2. Two-Way; Divided; Unprotected Median <input type="checkbox"/> 3. Two-Way; Divided; Positive Median Barrier <input type="checkbox"/> 4. One-Way; Not Divided	E. CARGO BODY TYPE V1 V2 <input type="checkbox"/> 1. Enclosed Box <input checked="" type="checkbox"/> 2. Cargo Tank <input type="checkbox"/> 3. Flatbed <input type="checkbox"/> 4. Dump <input type="checkbox"/> 5. Concrete Mixer <input type="checkbox"/> 6. Auto Transporter <input type="checkbox"/> 7. Garbage / Refuse <input type="checkbox"/> 8. Grain, Chip, Gavel <input type="checkbox"/> 9. Pole Trailer <input type="checkbox"/> 10. Other
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28 - NARRATIVE / STATEMENTS (If additional room is necessary, attach a separate sheet.)

This accident occurred on Route E, 0.6 miles north of MO 156, in Knox County. Vehicle 1 was southbound on Route E when the steering mechanism malfunctioned causing Driver 1 to lose control of the vehicle and travel off the right side of the roadway and strike a fence.

Driver 1 stated, " I came around the curve and heard something in the steering column pop and I couldn't steer any more."

29. REPORTING OFFICER SIGNATURE Anthony O'Brien	DSN / BADGE NO. 810	BEAT / ZONE 07	TRGROP / DIST / PCT B
REVIEWING OFFICER 1 SIGNATURE Jeffrey Creech	DSN / BADGE NO. 435	REVIEWING OFFICER 2 SIGNATURE DSN / BADGE NO.	



Order Information

Client SAFECO/CENTRAL REGION
 Claim ID [REDACTED]
 Order Date 6/26/2006 2:54:15 PM
 Inspector Code WG101
 Contract Number [REDACTED]
 Insured Party [REDACTED]
 Vehicle Year 2006
 Vehicle Make FORD
 Vehicle Model F250
 Vehicle VIN Number VFY
 Vehicle Mileage VFY

Facility Information

Facility Name HILTOP TOWING
 Facility Address 210468 HWY D
 Facility City LABELLE
 Facility State MO
 Facility Contact N/A
 Adjuster BETTY MALONE
 Adjuster Extension BETMAL@SAFECO.COM

Reason For Inspection

DRIVER IS CLAIMING THE STEERING FAILED CAUSING LOSS OF CONTROL AND SUBSEQUENT COLLISION. NEED INSPECTOR TO CHECK FOR SIGNS OF A STEERING FAILURE OR PROBLEM. CHECK THE LINKAGES, POWER STEERING PUMP, RACK CONNECTIONS, LEAKS, CONTAMINATION, ETC. NO LISTED RECALLS FOR STEERING ISSUES.

Report Information

Inspection Date 6/28/2006 11:00:00 AM
 Vehicle Year 2006
 Vehicle Make FORD
 Vehicle Model F250 P/U
 Current VIN Number 1FT5X21P26E [REDACTED]
 Vehicle VIN Number Originally Submitted as VFY
 Current Mileage 1379
 Vehicle Mileage Originally Submitted as VFY
 Vehicle Trim
 Labor Rate / Type 42 PROVIDED VERBALLY
 Engine Type 6.0 TURBO DIESEL
 Transmission / Model 4R100 AUTO
 Wheel Drive Type FOUR WHEEL DRIVE (4X4)

Engine Oil Level	Full	Engine Oil Condition	Good
Coolant Level	Full	Coolant Condition	Good
Transmission Level	Full	Transmission Condition	Good
Power Steering Level	Drained	Power Steering Condition	Good

Brake fluid Level	Full	Brake Fluid Condition	Good
Differential Fluid Level	N/A	Differential Fluid Condition	N/A
Transfer Case Level	N/A	Transfer Case Condition	N/A

Miscellaneous Comments

Commercial Use ?	NO	Why	
Modifications ?	NO	What	
Collision ?	YES	Describe	DAMAGE TO FRONT BUMPER,RIGHT FRONT FENDER,OIL PAN.
Tow Hitch ?	YES	Type	REC,HITCH
Towed or Driven In	TOWED		
Belts	GOOD		
Hoses	GOOD		
Overall Condition	GOOD		

Customer's Complaint on Repair Order

C/S STEERING FAILURE.

State of Assembly (be specific)

NO TEAR DOWN.

Any recalls TSB's, Oasis/Function 70, Parts Warranty?

Failed Components and Extent of Damage

STEERING WHEEL FREEWHEELS,NO MOVEMENT AT FRONT WHEELS.FRONT SUSPENSION INTACT,STEERING SHAFT CONNECTED TO GEAR BOX.P/S TANK EMPTY,GEAR BOX SEAL LEAKING FLUID TO A STEADY DRIP.NO IMPACT DAMAGE TO GEAR BOX OR STEERING COMPONENTS.HEAVY DAMAGE TO OIL PAN FROM IMPACT,ALSO DAMAGE TO FRONT BUMPER AND RIGHT FRONT FENDER.

Measurements of Components

Cause of failure

INTERNAL FAILURE/DEFECT OF STEERING GEAR BOX,CAUSING LOSS OF CONTROL AND COLLISION DAMAGE TO VEHICLE.

Recommendations for Repair

REPLACE STEERING GEAR BOX,OIL PAN,FRONT BUMPER AND RIGHT FRONT FENDER.

Inspector Signoff

View Images

Upload Date: 6/28/2006 8:57:53 PM

Notes: VEHICLE

Upload Date: 6/28/2006 8:57:54 PM

Notes: FRONT RIGHT SIDE STEERING COMPONENTS.



Upload Date: 6/28/2006 8:57:54 PM

Notes: LEFT SIDE STEERING COMPONENTS.

Upload Date: 6/28/2006 8:57:55 PM

Notes: P/S PUMP



Upload Date: 6/28/2006 8:57:55 PM

Notes: GEAR BOX.

Upload Date: 6/28/2006 8:57:56 PM

Notes: OIL PAN



Upload Date: 6/28/2006 8:57:56 PM

Notes: P/S TANK EMPTY

Upload Date: 6/28/2006 8:57:57 PM

Notes: ODOMETER



Upload Date: 6/28/2006 8:57:57 PM

Notes: VIN



Upload Date: 6/28/2006 8:57:57 PM

Notes: RIGHT FRONT FENDER



Upload Date: 6/28/2006 9:00:39 PM

Notes: FRONT BUMPER



Upload Date: 6/28/2006 9:00:40 PM

Notes: FRONT BUMPER



Upload Date: 6/28/2006 9:00:40 PM

Notes: VEHICLE



Upload Date: 6/28/2006 9:00:40 PM

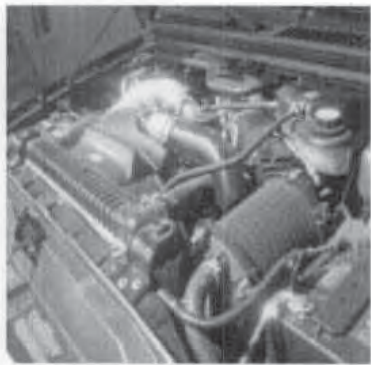
Notes: OIL PAN





Upload Date: 6/28/2006 9:00:41 PM

Notes: ENGINE



All Action Details for Issue

Print

VIN: 1FTSX21P26[REDACTED] Year: 2006 Model: F-SERIES SUPER DUTY Case: [REDACTED]
 Name: [REDACTED] Owner Status: Original WSD: 2006-05-24
 Symptom Desc: STRG/HANDLING FUNCTION LOSS OF STRG Primary Phone: [REDACTED]
 Reason Desc: LEGAL - OTHER ATTORNEY DEMAND Secondary Phone:
 Issue Type: 07 LEGAL Issue Status: CLOSED

Action: OPEN LEGAL CONTACT - ATTORNEY DEMAND

Dealer: 08006 JOE MACHENS FORD INC Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION-FD

Odometer: 1 MI Comm Type: MAIL

Analyst Name: LEICH,CHERIE Analyst: CLEICH

Action Date: 06/15/2006 Action Time: 16.06.22.905 Action Data: Yes

Comments *****ATTORNEY DEMAND*****DATE STAMPED 6-12-06. ATTORNEY ALLEGES CLIENT WAS INVOLVED IN AN ACCIDENT. HIS CLIENT FELT A THUD IN THE STEERING AND THEN HAD ABSOLUTELY NO CONTROL OVER THE VEHICLE, CAUSING AN ACCIDENT.ATTORNEY DEMANDS CONTACT FROM FORD REPRESENTATIVE.

Data Element Name	Data Value
NAME OF LAW FIRM	FARR, HICKMAN & SLAVIN
ATTORNEY NAME	JOHN C. SLAVIN
ATTORNEY PHONE NUMBER	6606657224
ANALYST ID	TROQUEMO

Action: SEND ACKNOWLEDGEMENT LETTER TO ATTORNEY

Dealer: 08006 JOE MACHENS FORD INC Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION

Odometer: 1 MI Comm Type: EMAIL

Analyst Name: ROQUEMORE (TROQUEMO), TANYA Analyst: TROQUEMO

Action Date: 06/16/2006 Action Time: 08.32.41.860 Action Data: No

Comments FAX ACK.

Action: INFORMATIONAL CALL/FAX

Dealer: 08006 JOE MACHENS FORD INC Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION

Odometer: 1 MI Comm Type: EMAIL

Analyst Name: ROQUEMORE (TROQUEMO), TANYA Analyst: TROQUEMO

Action Date: 06/16/2006 Action Time: 08.33.00.980 Action Data: No

Comments E-MAIL TO ZM.

Action: INFORMATIONAL CALL/FAX

Dealer: 08006 JOE MACHENS FORD INC Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION

Odometer: 1 MI
Analyst Name: ROQUEMORE
(TROQUEMO),TANYA
Action Date: 06/16/2006

Comm Type: PHONE
Analyst: TROQUEMO
Action Time: 09.58.11.912
Action Data: No

Comments LPA LEFT V-MESSAGE FOR SM TO CALL BACK REGARDING CUSTOMER CONCERNS.

Action: INFORMATIONAL CALL/FAX
Dealer: 08006 JOE MACHENS FORD INC

Origin Desc: CONSUMER AFFAIRS - LITIGATION
PREVENTION

Odometer: 1 MI
Analyst Name: ROQUEMORE
(TROQUEMO),TANYA
Action Date: 06/16/2006

Comm Type: EMAIL
Analyst: TROQUEMO
Action Time: 11.17.53.743
Action Data: No

Comments LPA REC'D RESPONSE FROM ZM/SM.

Action: REFER TO INSURANCE CARRIER - INSURANCE COMPANY ALREADY INVOLVED

Origin Desc: CONSUMER AFFAIRS - LITIGATION
PREVENTION

Dealer: 08006 JOE MACHENS FORD INC

Odometer: 1 MI
Analyst Name: ROQUEMORE
(TROQUEMO),TANYA
Action Date: 06/16/2006

Comm Type: FAX
Analyst: TROQUEMO
Action Time: 11.20.55.778
Action Data: No

Comments BASED ON REVIEW OF INFORMATION, DENIED. REFER TO INSURANCE COMPANY, WHICH IS
ALREADY INVOLVED. FAXING INSURANCE COMPANY ALREADY INVOLVED LETTER TO ATTORNEY.

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All Action Details for Issue

Print

VIN: 1F7SX21P26E [REDACTED] Year: 2006 Model: F-SERIES SUPER DUTY Case: [REDACTED]
 Name: [REDACTED] Owner Status: Original WSD: 2006-05-24
 Symptom Desc: STRG/HANDLING FUNCTION LOSS OF STRG Primary Phone: [REDACTED]
 Reason Desc: LEGAL - ACCIDENT Secondary Phone:
 Issue Type: 07 LEGAL Issue Status: CLOSED

Action: OPEN LEGAL CONTACT - PRODUCT LIABILITY - ACCIDENT
 Dealer: 08006 JOE MACHENS FORD INC Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION-FD
 Odometer: 1 MI Comm Type: EMAIL
 Analyst Name: LEICH,CHERIE Analyst: CLEICH
 Action Date: 06/08/2006 Action Time: 14.35.39.013 Action Data: Yes

Comments *****PRODUCT LIABILITY*****EMAIL RECEIVED 6-6-06.DEALER CONTACT RALPH DUMAS. CUSTOMER ALLEGES STEERING SHAFT BROKE AT GEAR WHILE TURNING, CAUSING AN ACCIDENT.CUSTOMER REQUESTS CONTACT FROM FORD REPRESENTATIVE.

Data Element Name	Data Value
ANALYST ID	LFONSECA

Action: MAKE OUTBOUND CALL TO DEALER
 Dealer: 08006 JOE MACHENS FORD INC Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION
 Odometer: 1 MI Comm Type: PHONE
 Analyst Name: FONSECA, LOURDES NEARON (L.C.) Analyst: LFONSECA
 Action Date: 06/09/2006 Action Time: 15.27.48.436 Action Data: No

Comments LPA SPOKE WITH DEALERSHIP, RALPH DUMAS, HE STATES THAT THE INSURANCE CO CALLED HIM REGARDING THE CLAIM. DLR STATES THAT THEY ARE UNABLE TO DETERMINE WHAT OCCURRED FIRST, DAMAGE TO VEHICLE CAUSING PART TO BREAK OR VICE-VERSA. LPA PROVIDED SUBROGATION INFO. NFA

Action: REFER TO INSURANCE CARRIER - INSURANCE COMPANY ALREADY INVOLVED
 Dealer: 08006 JOE MACHENS FORD INC Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION
 Odometer: 1 MI Comm Type: PHONE
 Analyst Name: FONSECA, LOURDES NEARON (L.C.) Analyst: LFONSECA
 Action Date: 06/09/2006 Action Time: 15.28.10.954 Action Data: No

Comments LPA SPOKE WITH DEALERSHIP, RALPH DUMAS, HE STATES THAT THE INSURANCE CO CALLED HIM REGARDING THE CLAIM. DLR STATES THAT THEY ARE UNABLE TO DETERMINE WHAT OCCURRED FIRST, DAMAGE TO VEHICLE CAUSING PART TO BREAK OR VICE-VERSA. LPA PROVIDED SUBROGATION INFO. NFA

Ford Confidential



Friday, May 12, 2006

PROBATIVE

FORD MOTOR COMPANY
3 PARKLANE BLVD PARKLANE TOWERS WEST #300
DEARBORN MI 48126-2568

MAY 19 2006


Re: **FACTORY DEFECT IN STEERING CAUSING DAMAGE TO THE VEHICLE**
VIN: 1FTWW33P06E [REDACTED]
Year: 06
Make: FORD
Model: F350 SUPER DUTY
Our Insured: [REDACTED]
Address: [REDACTED]
Phone No.: [REDACTED] WEST PALM BEACH FL ZIP/CPC: [REDACTED]
Our Claim No: [REDACTED]
Date of Loss: FEB 20 06
Damages: \$ 853.03

NOTICE OF SUBROGATION CLAIM

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

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

Please acknowledge receipt of my subrogation demand and forward your payment of \$ 853.03 to my attention, payable to "Progressive Express Insurance Company, as subrogee of [REDACTED] and mail to my attention at [REDACTED] Cleveland, OH [REDACTED]

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

Thank you for your anticipated cooperation.

Progressive Express Insurance Company

Frank A. Stein II AIC
Subrogation Representative
(440) 603-7319
Enclosures

All Action Details for Issue

[Print](#)

VIN: 1FTWW33P061 [REDACTED] Year: 2006 Model: F-SERIES SUPER DUTY Case: [REDACTED]
 Name: [REDACTED] Owner Status: Original WSD: 2006-01-21
 Symptom Desc: STRG/HANDLING FUNCTION Primary Phone: [REDACTED]
 Reason Desc: LEGAL - ACCIDENT Secondary Phone:
 Issue Type: 07 LEGAL Issue Status: CLOSED

Action: OPEN LEGAL CONTACT - PRODUCT LIABILITY - ACCIDENT
 Dealer: Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION-FD
 Odometer: 8280 MI Comm Type: EMAIL
 Analyst Name: LEICH,CHERIE Analyst: CLEICH
 Action Date: 02/21/2006 Action Time: 11.58.27.906 Action Data: Yes

Comments *****PRODUCT LIABILITY*****DATE STAMPED 2-21-06.DEALER CONTACT: JIM SUTTON. CUSTOMER ALLEGES STEERING FAILED CAUSING ACCIDENT.CUSTOMER REQUESTS CONTACT FROM FORD REPRESENTATIVE.

Data Element Name	Data Value
ANALYST ID	KDUNLAP

Action: MAKE OUTBOUND CALL TO DEALER
 Dealer: Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION
 Odometer: 8280 MI Comm Type: PHONE
 Analyst Name: DUNLAP, KENISHA Analyst: KDUNLAP
 Action Date: 02/22/2006 Action Time: 09.24.13.538 Action Data: No

Comments LPA CONTACTED DLR CONTACT JIM SUTTON. JIM WAS UNAVAILABLE. LPA LEFT A V-MAIL MSG.

Action: INFORMATIONAL CALL/FAX
 Dealer: Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION
 Odometer: 8280 MI Comm Type: PHONE
 Analyst Name: DUNLAP, KENISHA Analyst: KDUNLAP
 Action Date: 02/22/2006 Action Time: 09.34.52.278 Action Data: No

Comments LPA RECEIVED RETURN CALL FROM JIM. JIM STATED HE AND HIS FSE JEFF GIBULA TOOK THE VEH APART AND FOUND A NUT/BOLT HAD COME LOOSE AND CAUSED THE LACK OF STEERING ON THE VEH. CQIS REPORT NO. 6BUB2001.

Action: INFORMATIONAL CALL/FAX
 Dealer: Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION
 Odometer: 8280 MI Comm Type: PHONE
 Analyst Name: DUNLAP,

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All Action Details for Issue

Print

VIN: 1FTWW33P06E [REDACTED] Year: 2006 Model: F-SERIES SUPER DUTY Case: [REDACTED]
 Name: [REDACTED] Owner Status: Original WSD: 2006-01-21
 Symptom Desc: Primary Phone: [REDACTED]
 Reason Desc: DEALER GENERATED INFORMATION ISSUE Secondary Phone:
 Issue Type: 02 INFORMATION Issue Status: CLOSED

Action: FORD COVERED REPAIR MADE - WARRANTY
 Dealer: Origin Desc: DEALER
 Odometer: 8280 MI Comm Type: VISIT
 Analyst Name: JAMES SUTTON Analyst: J-SUTTO3
 Action Date: 02/21/2006 Action Time: 14.25.05.498 Action Data: No

Comments VEHICLE WAS TOWED IN ON 02-20-2006. CUSTOMER STATED THAT STEERING HAD FAILED AND TRUCK IMPACTED A CONCRETE GUARDRAIL. THE TRUCK AT THE TIME WAS TOWING A TRIPLE AXLE CAR TRAILER. THERE IS SOME DAMAGE TO RT SIDE OF TRUCK AND ROOF OF TRUCK WAS DAMAGED WHEN TRAILER JACK-KNIFED. WE HAVE INSPECTED TRUCK FOR ANY SIGNS OF IMPACT DAMAGE TO CAUSE STEERING TO FAIL AND HAVE NOT FOUND ANY. CONTACTED JEFF GIBULA F.S.E. AND HE ALSO TOOK PICTURES AND INSPECTED TRUCK. WE WILL PROCEED TO REPAIR VEHICLE UNDER WARRANTY AND REPAIR DAMAGE CAUSED BY ACCIDENT. ALSO HAVE FILED A REQUEST FOR CONSUMER AFFAIRS REVIEW DOCUMENTING CUSTOMER'S CLAIM AND INSURANCE INFORMATION.

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Standard Claims List For Model Year 2006

Detailed Vehicle Specification

VIN	VEH LINE	MKT DERIV	BODY CAB	VER SERIES	DRIVE TYPE	PLT CD	TRS CD	ENG CD	PROD DATE	WARR DATE	SELLING DEALER	SELL CNT	TIS	WCC	CPSC_6	PREF	BASE	SUFF	CCC	CD	DIST (Miles)			
1FTWW33P06[REDACTED]	T/F7	F	T/BC	T/CD	T/E	AI	T/BE	T/YB	04-JAN-2006	21-JAN-2006	124217	USA	2	5001	110201	5C3Z	3504	AA	C50	01	8280			
AWS Claim Key:		861209	Trx Code:		1	Labor Hrs:		5.1																
Dlr Cd-Sub Cd:		04835 - *	Name:		MAROONE FORD OF DELRAY			Ph:	561-2780303		St:	FL	Ctry Cd:		USA		Reg Cd:	NA		Repr Date:	20-FEB-2006		Doc #:	044204A
Cust Comments:		C50 CUSTOMER REPORTS STEERING WHEEL SPINS FREELY WONT STEER TRUCK, CHECK AND ADVISE																						
Tech Comments:		8280 TRUCK TOWED IN STEERING WHEEL JUST SPINS NO REACTION OF WHEELS INSPECT AND FOUND INPUT TO STEERING GEAR NORMALLY NO OUTPUT AWAITED ARRIVAL OF DIST REP JEFF KEBULA TO AID IN INSPECT PUSHED AND LIFTED INTO STALL INSPECT UNDERCARRIAGE NO IMPACT MARKS FOUND EXCEPT FOR WHEEL CONTACT AND BROKEN AND MISSING CENTER CAP BODY DAMAGE JEFF GAVE GO AHEAD ON REMOVAL OF GEAR DID SO DISASSEMBLE																						

PE13-014 000159LCPV

Claim Detail Report

Model Year = 2006 Claim Key = 861209

Vehicle Information

Model Year: 2006
 Market Derived: F - FORD
 Body/Cab Type: T/BC - DOUBLE CAB (CREW CAB)
 Version/Series: T/CD-350 SERIES
 Drive Type: T/E-4 WHL L/H PART TIME DRIVE
 Vehicle Line: T/F7-F250HD/350/450/550 [99-07]
 Warranty Start Date: 21-JAN-2006
 Production Date: 04-JAN-2006
 VIN: 1FTWW33P06E [REDACTED]

Claim Information

Document Number: [REDACTED]
 Repair Date: 20-FEB-2006
 Distance: 8280
 TIS: 2

Dealer Information

Dealer Name MAROONE FORD OF DELRAY
 Dealer Code: 04835 - *
 Address: 1311 LINTON BOULEVARD
 City: DELRAY BEACH
 State: FL Zip Code:33444
 Country: USA Region Code: NA
 Phone: (561)030-0303

Cust. Concern Code: C50 - OTHER STEERING/HANDLING AND RIDE TROUBLES

Condition Code: 01 - BROKEN/CRACKED

Technician Comment: 8280 TRUCK TOWED IN STEERING WHEEL JUST SPINS NO REACTION OF WHEELS INSPECT AND FOUND INPUT TO STEERING GEAR NORMALLY NO OUTPUT AWAITED ARRIVAL OF DIST REP JEFF KEBULA TO AID IN INSPECT PUSHED AND LIFTED INTO STALL INSPECT UNDERCARRIAGE NO IMPACT MARKS FOUND EXC EPT FOR WHEEL CONTACT AND BROKEN AND MISSING CENTER CAP BODY DAMAGE JEFF GAVE GO AHEAD ON REMOVAL OF GEAR DID SO DIASSEMBLE

Customer Comment: C50 CUSTOMER REPORTS STEERING WHEEL SPINS FREELY WONT STEER TRUCK, CHECK AND

PE13-014 000160LCPV

ADVISE

Labor Op Code	Labor Op Description
3504A	STEERING GEAR ASSEMBLY REMOVE AND INSTALL OR REPLACE
14056D6	CONTACT ASSEMBLY - AIR BAG SLIDING REPLACE
1130A	WHEEL RING/HUB CAP/WHEEL COVER REPLACE
3001A	CASTER, CAMBER, TOE-IN CHECK
3001A1T	CASTER, CAMBER AND TOE-IN CORRECT
4602A	DRIVE SHAFT ASSEMBLY - REAR REMOVE AND INSTALL OR REPLACE

Causal Flag	Full Part Number	Part Description	Part CPSC	Part Quantity
PREF	BASE	SUFF		
Y	5C3Z 3504	AA GEAR ASY-STEERING	110201	1
N	5C3Z 1130	TA HUB CAP	040403	1
N	5C3Z 14A664	AA AIR BAG CLOCK SPRING	110602	1

PE13-014 000161LCPV



BEGINNING OF CONTACT
07/26/2011

VOICE OF THE CUSTOMER TRACKING SYSTEM

07.55.13

REGION: S3 ORLANDO OGC ISSUE CASE NBR: 1499912061.
VIN: 1FTSX21526E ZONE: A06 OPENED: 2011/07/25
ENGINE: 5 VEH TYPE: T CLOSED: 2011/07/25

LAST NAME: [REDACTED] STATUS: CLOSED
TITLE: [REDACTED] FIRST NAME: MI:
ADDRESS: [REDACTED]
CITY: HENRICO STATE: VA ZIP: 23228
HOME PHONE: MODEL YEAR: 2006 MODEL: F-SERIES
MILEAGE: 107000
DEALER NAME: FORD OF OCALA INC SALES CODE: F24500 P & A: 02543
REASON CODE: 0772 LEGAL - ACCIDENT
SYMPTOMS: 303155 STRG/HANDLING FUNCTION LOSS OF STRG

ORIGIN: CAC138 - US CONCERN CASE BASE COMMUNICATION: PHONE
ACTION: 791 - ADVISE CUSTOMER INFO WILL BE SENT TO OGC
DOCUMENT: ANALYST: ABRIX BRIX (ABRIX), ANITA

DATE: 2011/07/25 TIME: 14.03.32 :
ACTION DATA/COMMENTS:

CUSTOMER SAID: 1. WHAT WAS THE DATE OF THE ACCIDENT?: JULY 12, 2011 2. WHAT THE CUSTOMER IS ALLEGING THE PRODUCT DEFECT IS THAT CAUSED ACCIDENT: CUST BELIEVES THAT THE STEERING BOX CAME APART ON HIS VEH; THE STEERING WHEEL JUST SPUN AROUND IN HIS HAND; THE STEERING WHEEL JUST SPUN AROUND IN HIS HAND; VEH HAD NO STEERING AT 70 MPH 3. IF THERE WERE ANY INJURIES SUSTAINED? NO 4. WHAT WAS THE LOCATION OF THE VEHICLE WHEN THE ACCIDENT OCCURRED?: ON 1-75 SOUTHBOUND AT THE 357 MILE MARKER 5. WAS A POLICE REPORT FILED?: YES 6. IF A POLICE REPORT WAS FILED, WHAT WERE THE FINDINGS?: NEITHER POLICE NOR CUST COULD THINK OF WHAT CAUSED THE ACCIDENT 7. WHAT IS THE POLICE REPORT NUMBER AND THE CITY OR COUNTY IN WHICH THE REPORT WAS FILED?: POLICE REPORT # FHP [REDACTED] MARION COUNTY, FLORIDA 8. DID THE CUSTOMER FILE A CLAIM WITH THEIR INSURANCE COMPANY? NO 9. IF A CLAIM HAS BEEN FILED WITH THEIR INSURANCE COMPANY, WHAT IS THE STATUS OF THE CLAIM?: 10. IS THE VEHICLE REPAIRABLE? YES 11. NAME AND ADDRESS OF CUSTOMER'S ATTORNEY (ONLY IF THE CUSTOMER MENTIONS THEY HAVE SOUGHT ONE). DEALER SAID: NONE FORD OF OCALA, INC. FORD CODE: 24D500 LM CODE: 25D113 DEALER PROFILE 2816 NW PINE AVENUE OCALA, FL 34475 TEL: (888) 255-1599 CRC ADVISED: 12. WHAT THE CUSTOMER IS SEEKING? WHEN THE TOW TRUCK GOT TO THE ACCIDENT, THE FRONT WHEELS OF THE TRUCK WERE TO THE RIGHT, STEERING WHEEL WAS STRAIGHT. THERE WAS NO SHOCK TO THE STEERING SYSTEM. THEY TOOK A J-HOOK AND USED IT TO TURN THE WHEELS STRAIGHT, BUT THAT DIDN'T WORK. THE NEXT MORNING, CUST JACKED UP THE FRONT OF THE VEH. THE STEERING BOX WAS LOCKED TO THE RIGHT ABOUT 30 TO 35 DEGREES. SOMETHING CAME LOOSE INTERNALLY IN THE STEERING BOX. CUST FEELS FORD SHOULD TAKE THIS VEH BACK AND LOOK AT IT AND DIAGNOSE WHAT HAPPENED WITH THE STEERING BOX. WHEN CUST LOOKED UP INFO ON INTERNET ABOUT STEERING BOXES, THERE IS AN ISSUE WITH THIS. CUST WOULD LIKE THE VALUE OF THE TRUCK AND HAVE FORD TAKE THE VEH AND DIAGNOSE IT TO SEE

FORD POLICE REPORT
FILED
JUL 26 2011
OFFICE OF THE
GRAND JUROR

CONSUMER AFFAIRS

07/26/2011 FAX OGC2 CONFIDENTIAL



State Farm Insurance Companies



State Farm Insurance
Subrogation Services
PO Box 2371
Bloomington, IL 61702-2371

June 16, 2008

Certified Mail-Return Receipt Requested

Ford Motor Company
Office of General Counsel
3 Parklane Blvd, Suites 400; Parklane Towers West
Dearborn, MI 48126

FORD MOTOR COMPANY
RECEIVED
CLAIMS UNIT

JUN 20 2008

OFFICE OF THE
GENERAL COUNSEL

RE: Claim Number: [REDACTED]
Date of Loss: March 3, 2008
Our Insured: [REDACTED]
Vehicle: Ford, F250 SD
VIN: 1FTSW21P66E [REDACTED]
Mileage: 61365
Your File Number:
Insured's Deductible: \$500.00

Dear Sir/Madam:

This notice is to advise of a loss that occurred to our insured's vehicle. The damage was caused by the steering gear box failing. Only supporting documents available are enclosed. NO physical evidence was retained.

Our investigation indicates that Ford Motor Company is responsible for this loss. By virtue of our payment, we are entitled to recover from the responsible party. Please consider this letter as our demand to Ford Motor Company for reimbursement of \$996.11.

Any settlement with State Farm's policyholder with respect to this loss must not prejudice our rights, as subrogor, and shall not be released by execution of a general release with such policyholder.

In order to assist you in evaluating and processing the 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


HOME OFFICES: BLOOMINGTON, ILLINOIS 61710-0001

PE13-014 000165LCPV

Page 2
June 16, 2008

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.

Sincerely,


Patty Riddle
Claim Processor
(877) 457-8276 ext 59770, Team 60

State Farm Mutual Automobile Insurance Company

SERVICE INVOICE



SHETLER-CORLEY MOTORS, LTD

1623 North Parkerson Ave.
CROWLEY, LOUISIANA 70526
(337) 783-4600



COURTESY NO. 13307	ADVISOR CHRISTOPHER FOREMA	TAG NO. 724	INVOICE DATE 04/15/08	WARRANTY NO. FOCS26119
LABOR RATE	VEHICLE NO.	PLATE 64-623	COLOR WHITE/	STOCK NO. T823A
YEAR / MAKE / MODEL 06 / FORD TRUCK / F250 / CREW CAB SRW 4X4	VEHICLE TYPE	REGISTRATION DATE 04/24/06	REGISTRATION NO.	PRODUCT ID 29 927
RT # / PKT 1 P T S W 2 1 P 6 6 E	PO NO.	TO DATE 04/07/08	REPRINT# 1	
RESIDENCE PHONE	BUSINESS PHONE	COMMENTS	MO: 64623	

JOB# 3 TOTALS.....	TOTAL - SUBLET	66.00
	PARTS	38.00
	SUBLET	66.00
JOB# 3 JOURNAL PREFIX FOCS	JOB# 3 TOTAL	104.00
MISC.....CODE.....DESCRIPTION.....CONTROL NO.....	TOTAL - MISC	14.75
JOB # A 100 SHOP SUPPLIES		14.75
TOTALS.....	TOTAL LABOR....	295.00
	TOTAL PARTS....	137.90
	TOTAL SUBLET....	66.00
	TOTAL G.O.G....	0.00
	TOTAL MISC CHG.	114.75
	TOTAL MISC DTSC	0.00
	TOTAL TAX.....	58.31
	TOTAL INVOICE \$	671.96

Warranty Statement. Any warranties on the products sold hereby are those made by the manufacturer. The Seller hereby expressly disclaims all warranties, either expressed or implied including any implied warranty of merchantability or fitness for a particular purpose, and neither assumes nor authorizes any other person to assume for it any liability in connection with the sale of said products.

NOT RESPONSIBLE FOR ANY AUDIO EQUIPMENT OR ANY PERSONAL ITEMS LEFT IN THIS VEHICLE.

THANK YOU FOR YOUR BUSINESS!!

CUSTOMER SIGNATURE

IMPORTANT MESSAGE

IT IS VERY IMPORTANT TO US THAT YOU ARE "VERY SATISFIED" WITH THE SERVICE YOU HAVE RECEIVED

YOU MAY RECEIVE A SURVEY IN THE MAIL ASKING YOU TO GRADE US ON THIS SERVICE VISIT

IF YOU CANNOT ANSWER ALL THE QUESTIONS "VERY SATISFIED" PLEASE CALL OUR SERVICE MANAGER.









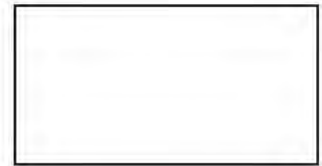




FORD MOTOR COMPANY
RECEIVED
CLAIMS UNIT

FEB 29 2008

OFFICE OF THE
GENERAL COUNSEL



ASPEY
WATKINS
& DIESEL
ATTORNEYS
P.L.L.C.

LOUIS M. DIESEL

WRITER'S FAX LINE:
WRITER'S EMAIL:

928-774-8404
LDIESEL@AWDLAW.COM



February 12, 2008

RECEIVED

FEB 20 2008

RECEIVED
5

123 N. San Francisco St.
Suite 300
Flagstaff, Arizona 86001
(928) 774-1478
www.awdlaw.com

Ms. Julie Szymanski
Product Claims Department
Ford Motor Company
P. O. Box 70
Dearborn, Michigan 48121-0070

Sedona Office
120 Soldier Pass Road
Sedona, Arizona 86336
(928) 282-5955

Re: [REDACTED] v. *Ford Motor Company*

Date of Loss: March 11, 2007
Vehicle Involved: 2006 Ford F250 Super Duty
VIN Number: 1FTSW21P76E [REDACTED]

Dear Ms. Szymanski:

Please be advised that this office has been retained by [REDACTED] for injuries and damages she received in an accident which was a result of a defective steering system in her 2006 Ford F250 Super Duty.

I am sure you have received by now, from Bob Williams of Farm Bureau Claims, a copy of his report from [REDACTED] which found that:

At our inspection, it was clear that while the steering wheel was securely fastened to the steering column and input shaft, the steering box was unable to transfer steering input from the steering wheel to the sector/pitman shaft and on to the pitman arm and subsequent steering linkage, then to each of the front tires. It is our opinion that this steering box had an internal problem that caused excessive wear that created metal shavings and this steering box failed prior to this collision. Note the low miles on the odometer of 008686.

Additionally, all the signs that would clearly show the steering box was damaged at or during this collision are no where to be found. The subject truck has no steering linkage damage, no sector/pitman shaft twisting or damage, no bent or damaged steering components and the passenger side front tire and wheel are still intact and inflated while the driver's side front tire has been deflated because the bead has been broken.

A copy of that report is enclosed.

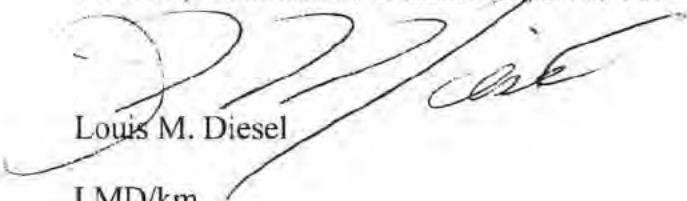
As a result of the defective steering box, my client suffered severe injuries, the most serious of which was a broken wrist. The accident in question occurred on March 11, 2007 on Interstate 17 southbound in Yavapai County, Arizona. My client was traveling approximately 65 miles per hour in the posted 75 mile per hour zone when she lost control of her steering. The truck rolled approximately one and one-quarter times coming to rest on its right side. Ms. [REDACTED] sustained a broken wrist with her husband, [REDACTED] sustaining a broken finger. There several month-old baby was in a car seat and luckily did not receive any injuries. My clients did not have any service done on the steering box assembly from the time of purchase to the date of the accident. This 2006 Ford F250 was a fairly new vehicle with only 8,686 miles.

I am in the process of obtaining complete medical records and I will provide them to you as soon as I receive them. I am requesting that you contact me within two (2) weeks of today's date if you are interested in resolving this case without any further litigation. The Salem report is very clear that this accident was a direct result of the defective steering box.

If you are unable to reach me, please feel free to talk to my associate, Gunter Ziwey.

Sincerely,

ASPEY, WATKINS & DIESEL, P.L.L.C.


Louis M. Diesel

LMD/km

Enclosure

January 28, 2008

Mr. Bob Williams
Farm Bureau Claims
P.O. Box 458
Cottonwood, AZ 86326



Your client or claim: [REDACTED]
My case number: 07-009

Dear Mr. Williams:

I have reviewed the file you provided me. On May 17, 2007, we have inspected the following subject vehicle numerous times at Salem Boys Auto, 1025 West Warner Road, Tempe, AZ 85284:

2006 Ford F-250 Super Duty 6.0 Power Stroke, white in color
VIN# 1FTSW21P76E[REDACTED], Production Date - 01/06
Miles - 08686, AZ Plate - none (plate removed by others)

Questions:

- #1 What is presently wrong with the steering system on this car?
- #2 Is the steering defect related to the accident, otherwise, did it occur prior to or as a result of the collision?

Preliminary Conclusion:

At our inspection, it was clear that while the steering wheel was securely fastened to the steering column and input shaft, the steering box was unable to transfer steering input from the steering wheel to the sector/pitman shaft and on to the pitman arm and subsequent steering linkage, then to each of the front tires. It is our opinion that this steering box had an internal problem that caused excessive wear that created metal shavings and this steering box failed prior to this collision. Note the low miles on the odometer of 008686.

Additionally, all the signs that would clearly show the steering box was damaged at or during this collision are no where to be found. The subject truck has no steering linkage damage, no sector/pitman shaft twisting or damage, no bent or damaged steering components and the passenger side front tire and wheel are still intact and inflated while the driver's side front tire has been deflated because the bead has been broken.

[REDACTED] * Tempe, AZ * [REDACTED]

Discussion:

Here is some important notes we took during the inspection:

1. Stock tires, wheels and suspension.
2. The steering box has ground up metal inside of it.
3. The fluid for both the return and pressure line is red, clean and without metal.
4. The ground up metal suggests something was rubbing or coming apart internally for quite some time prior to this accident.
5. No leaks found or seen in and around this power strg system.
6. None of the steering linkage is damaged or bent in any way.
7. This Internal steering box damage is not what we typically see when the steering linkage takes a hard hit. We typically see twisted splines on the pitman arm or damage to the sector/pitman shaft and/or teeth.

On May 16, 2007, we loaded the truck onto a lift and we took ID pictures. We rotated the steering wheel right and left a quarter turn each way and found the steering shaft was firmly connected to input shaft of the steering gear box. But there was no movement at the sector/pitman shaft or arm. We raised the truck in the air and inspected the steering linkage and found all of the steering components to be the original factory installed parts. We found no suspension modifications that had been done to this truck. We found no evidence of, nor any damage to any of the suspension or steering components.

We found the left front (LF) tire off the bead and no air in it. The other three tires all have air in them, LR had 44 psi, RF had 71 psi and RR had 73psi. We checked the power steering fluid and found it full, red and the fluid appeared to be in good condition. The power steering drive belt was intact and installed correctly.

We removed the pinch bolt from the steering coupler and slid back the steering shaft from the steering box. We removed the pressure and return lines from the power steering gearbox. We removed the cotter key, castle nut and steering linkage retaining nut from the sector/pitman shaft. We used a pickle fork on an air hammer to remove the linkage from the sector/pitman shaft. We removed the steering box mounting bolts from the frame and removed the power steering gearbox from the truck.

We placed the steering gear box on the work bench and photographed it on all sides. We clamped the pitman arm in a vice to hold the box while we loosened the sector/pitman shaft nut and removed the pitman arm from the sector/pitman shaft. We removed the four top cover bolts and removed the sector/pitman shaft from the gearbox. We found two gear teeth broken off the sector/pitman shaft and one tooth and one of the stops broken off the input shaft gear.

When we removed the sector/pitman shaft, the fluid that drained out was gray and full of metal shavings. We captured some of the gray fluid as it drained from the sector/pitman shaft end of the gear box while removing the shaft. The fluid that drained from the two power steering hoses and the top section of the steering gear box was red and clean and without metal shavings.

The evidence of the fine metal shavings and gray fluid in the bottom of the steering gear box strongly suggests this damage occurred over a period of time. With there being no steering linkage damage and no evidence of any prior accident or impact to any portion of the subject truck, it appears the gear box failed internally and eliminated the driver's ability to steer this truck and caused the driver to lose control of the truck and crash.

On August 31, 2007, we took the disassembled subject steering box to ATSCO, a local national rebuilder of like parts and hydraulic components. They reviewed the disassembled subject gear box and concluded that there was unnatural internal wear associated with miss-adjustment.

On September 21, 2007, Michael Jerome, a retired engineer from Saginaw Steering Division (GM) looked at the disassembled subject steering box at our facility. He also saw, identified and pointed out abnormal wear patterns on the vertical shaft which is also called a sector shaft and the horizontal shaft which is also called the input shaft. It was his opinion that the subject steering box did not suffer damage from force, but the damage was related to miss-adjustment and abnormal wear.

In our opinion, the fact that we found and photographed ground up metal within the subject steering box clearly shows there was some internal components that were rubbing one another abnormally or improperly causing the ground up metal found inside the steering gear box.

On October 2, 2007, we delivered the subject steering box to Dr. Lester Hendrickson, a metallurgist in Tempe and discussed the issue asked him to look the components over. We were told he could look at the subject steering box early November.

On November 28 & 29, 2007, at the request of Dr. Lester Hendrickson, a metallurgist, he was permitted to photograph and inspect the steering system of the subject truck. As he requested, we pulled the driver's side tie rod end from the spindle so he could inspect the cone of the tie rod ends for damage, nicks, dents, witness marks related to any kind of hit the front steering system may have taken. According to our inspection and Dr. Lester Hendrickson's inspection, we found no witness marks that would suggest any kind of force that had been applied to this joint.

We are awaiting Dr. Lester Hendrickson's written reports.

We have included three copies of a CD that contains the pictures of the above listed activities. The enclosed CD has a root folder of 07-009pics and then 4 sub folders:

1. Sub folder 032207 shows the subject truck's arrival at our facility, the unloading of the truck and the final wrapped truck.
2. Sub folder 051707 shows highlights of our inspection.
3. Sub folder 052507 shows normal parts along side broken parts. The steering box on your left is the subject steering box, the one on your right is an exemplar steering box.
4. Sub folder 112907 shows the results of our inspection of the tie rod ends at the request of Dr. Lester Hendrickson, a metallurgist.

We have impounded the subject steering box and pitman arm and a small container of fluid.

While researching the subject steering box, we found that this subject steering box has already been superceded by at least two and maybe one more other, updated steering boxes. We have purchased update one and two, update #3 box is unavailable because what is being distributed, is already spoken for.

We have enclosed an invoice for services you have requested and we have provided through today. In the event additional services are needed, we will be billing you monthly.

Thank you for allowing us the opportunity to serve you. In the event you need or obtain more information, please call me at 480-598-1234 or e-mail me at mark@marksalem.com.

Sincerely,



Mark Salem

enclosure

1 Louis M. Diesel (State Bar No. 003595)
Brian Y. Furuya (State Bar No. 025486)
2 **ASPEY, WATKINS & DIESEL, P.L.L.C.**
123 N. San Francisco Street
3 Flagstaff, Arizona 86001
Telephone: (928) 774-1478
4 Fax: (928) 774-8404
Email: LDiesel@awdlaw.com
5 BFuruya@awdlaw.com
Attorneys for Plaintiff Kristi Hubbard
6

7 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**
8 **IN AND FOR THE COUNTY OF YAVAPAI,**
9 **VERDE VALLEY JUDICIAL DISTRICT**

10 [REDACTED] a married woman,
11 Plaintiff,

Case No. [REDACTED]
COMPLAINT

12 vs.
13 FORD MOTOR COMPANY, a Delaware
14 corporation; DON SANDERSON FORD, INC.,
d/b/a SANDERSON FORD LINCOLN
15 MERCURY, an Arizona corporation; WHITE
CORPORATIONS I-V; BLACK LLCs I-V;
16 JOHN/JANE DOES I-V,
17 Defendants.

(Tort Non-Motor Vehicle; Products Liability)

18 NOW COMES Plaintiff, by her attorney undersigned, and files this action for
19 recovery of compensation from Defendants above-captioned. In support of this
20 Complaint, Plaintiff alleges as follows:

21
22 **I.**
23 **(Jurisdiction and Venue)**

- 24 1. Plaintiff [REDACTED] is a resident of Coconino County, Arizona.
25 2. Upon information and belief, Defendant Ford Motor Company ("Ford") is a
26 corporation duly organized and existing under the laws of the state of Delaware.
27 3. Upon information and belief, Defendant Ford's principal office is located in
28 Dearborn, Michigan.

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14. Plaintiff was pulling a 2007 white 35-foot Toy Hauler trailer.

15. Upon information and belief, Plaintiff was traveling well within the posted speed limits in the general vicinity of milepost 309, when the steering became abruptly, suddenly and completely unresponsive.

16. Upon information and belief, the failure of steering caused the Truck to veer off of the road out of control and roll one complete time, also separating the trailer from the Truck ("Collision").

17. After the Collision, Plaintiff caused the vehicle to be examined by Salem Boys Auto to determine the cause of the steering failure.

18. On or about January 28, 2008, Salem Boys Auto issued a preliminary report concluding on the basis of their investigation that the Truck's "steering box had an internal problem that caused excessive wear that created metal shavings and this steering box failed prior to [the Collision]. A copy of this preliminary report is attached as "Exhibit A" and incorporated herein by this reference.

19. On or about February 15, 2008, metallurgist Lester E. Hendrickson, Ph.D., forensic engineering consultant with SEMTEC Laboratories, issued his written "Report examination of components of the steering system on [the Truck]." A copy of this report is attached as "Exhibit B" and incorporated herein by this reference.

20. This report opines that the failure of the steering mechanism of the Truck is explainable as caused by "a force generated internally in the power assisted steering system."

III.
(First Cause of Action—Negligence)

21. Plaintiff restates and incorporates all previous paragraphs by this reference.

22. Upon information and belief, Defendants Ford and Sanderson are commercial suppliers of vehicles, and owe a duty of care to those who purchase and use products supplied by them.

1 hospitalization, all in an amount as shall be reasonable in the premises, but which exceeds
2 the jurisdictional requirements and mandatory arbitration limits of this Court.

3
4 **V.**

5 **(Third Cause of Action—Breach of Warranty of Merchantability)**

6 31. Plaintiff restates and incorporates all previous paragraphs by this reference.

7 32. The defective and unreasonably dangerous steering system of the Truck
8 rendered the Truck as below average quality for vehicles of this nature, unfit for the
9 ordinary use of the Truck as a conveyance vehicle, as aberrant in quality from other
10 vehicles of its kind.

11 33. By supplying Plaintiff with such a product, Defendants breached the
12 implied warranty of merchantability.

13 34. As a result of said breach, Plaintiff suffered severe physical injury from the
14 Collision, including but not limited to a broken arm, was prevented from fully transacting
15 business, suffered severe physical and mental pain, and incurred expenses for medical
16 attention and hospitalization, all in an amount as shall be reasonable in the premises, but
17 which exceeds the jurisdictional requirements and mandatory arbitration limits of this
18 Court.

19 **V.**

20 **(Fourth Cause of Action—Breach of Express Warranty)**

21 35. Plaintiff restates and incorporates all previous paragraphs by this reference.

22 36. Upon information and belief, the Defendants provided Plaintiff with an
23 express contractual warranty that provided, among other things, that the Truck's steering
24 system would be functional.

25 37. Upon information and belief, the Truck's steering system was not
26 functional within the meaning of the express warranty.

27 38. By supplying Plaintiff with such a product, Defendants breached the
28 express warranty.

May 29, 2007

Mr. Bob Williams
Farm Bureau Claims
P.O. Box 458
Cottonwood, AZ 86326



Your client or claimant: [REDACTED] Olsen Grain, Inc.
My case number: [REDACTED]

Dear Mr. Williams:

I have reviewed the file you provided me. On May 17, 2007, we have inspected the following subject vehicle at Salem Boys Auto, 1025 West Warner Road, Tempe, AZ 85284.

**2006 Ford F-250 Super Duty 6.0 Power Stroke, white in color
VIN# 1FTSW21P76E [REDACTED] Production Date - 01/06
Miles - 08686, AZ Plate - none (plate removed by others)**

Question:

- #1 What is presently wrong with the steering system on this car? .
- #2 Is the steering defect related to the accident, otherwise, did it occur prior to or as a result of the collision?

Preliminary Conclusion:

At our inspection, it was clear that while the steering wheel was securely fastened to the steering column and input shaft, the steering box was unable to transfer steering input from the steering wheel to the sector/pitman shaft and on to the pitman arm and subsequent steering linkage, then to each of the front tires. It is our opinion that this steering box had an internal problem that caused excessive wear that created metal shavings and this steering box failed prior to this collision. Note the low miles on the odometer of 008686.

Additionally, all the signs that would clearly show the steering box was damaged at or during this collision are no where to be found. The subject truck has no steering linkage damage, no sector/pitman shaft twisting or damage, no bent or damaged steering components and the passenger side front tire is still intact and inflated while the driver's side front tire has been deflated because the bead has been broken.

1025 West Warner * Tempe, AZ * 85284 * 480-598-1234

Discussion:

Here is some of the notes we took during the inspection:

1. Stock tires, wheels and suspension.
2. The steering box has ground up metal inside of it.
3. The fluid for both the return and pressure line is red, clean and without metal.
4. The ground up metal suggests something was rubbing or coming apart internally for quite some time prior to this accident.
5. No leaks found or seen in and around this power strg system.
6. None of the steering linkage is damaged or bent in any way.
7. This damage is not what we have seen on a crash where the steering linkage took a hard hit and twisted the splines or damaged the sector/pitman shaft and/or the teeth.

Protocol:

We loaded the truck onto a lift and we took ID pictures. We rotated the steering wheel right and left a quarter turn each way and found the steering shaft was firmly connected to input shaft of the steering gear box. But there was no movement at the sector/pitman shaft or arm. We raised the truck in the air and inspected the steering linkage and found all of the steering components to be the original factory installed parts, we found no suspension modifications that had been done to this truck. We found no evidence of, nor any damage to any of the suspension or steering components.

We found the left front (LF) tire off the bead and no air in it. The other three tires all have air in them, LR had 44 psi, RF had 71 psi and RR had 73psi. We checked the power steering fluid and found it full, red and the fluid appeared to be in good condition. The power steering drive belt was intact and installed correctly.

We removed the pinch bolt from the steering coupler and slid back the steering shaft from the steering box. We removed the pressure and return lines from the power steering gearbox. We removed the cotter key, castle nut and steering linkage retaining nut from the sector/pitman shaft. We used a pickle fork on an air hammer to remove the linkage from the sector/pitman shaft. We removed the steering box mounting bolts from the frame and removed the power steering gearbox from the truck.

We placed the steering gear box on the work bench and photographed it on all sides. We clamped the pitman arm in a vice to hold the box while we loosened the sector/pitman shaft nut and removed the pitman arm from the sector/pitman shaft. We removed the four top cover bolts and removed the sector/pitman shaft from the gearbox. We found two gear teeth broken off the sector/pitman shaft and one tooth and one of the stops broken off the input shaft gear.

When we removed the ~~sector~~/pitman shaft, the fluid that drained out was gray and full of metal shavings. We captured some of the gray fluid as it drained from the ~~sector~~/pitman shaft end of the gear box while removing the shaft. The fluid that drained from the two power steering hoses and the top section of the steering gear box was red and clean and without metal shavings.

The evidence of the fine metal shavings and gray fluid in the bottom of the steering gear box strongly suggests this damage occurred over a period of time. With there being no steering linkage damage and no evidence of any prior accident or impact to any portion of the subject truck, it appears the gear box failed internally and eliminated the driver's ability to steer this truck and caused the driver to lose control of the truck and crash.

We have included three copies of a CD that contains the pictures we took of our inspection and subsequent comparison of the subject vehicles broken parts to an exemplar steering box's working parts.

The enclosed CD has a root folder of 07-009pics

1. The sub folder 032207 shows the subject truck's arrival at our facility, the unloading of the truck and the final wrapped truck.
2. The sub folder 051707 shows highlights of our inspection.
3. The sub folder 052707 shows normals parts along side broken parts. The steering box on your left is the subject steering box, the one on your right is an exemplar steering box.

In our opinion, the next step should be the disassembly of the subject steering box to determine what internal components were rubbing one another causing the metal to be found inside the steering gear box. At that point, we can also separate and gather the matching internal parts for examination by a metallurgical expert. One possibility is that this steering box was not adjusted correctly causing internal wear that ultimately caused the steering box to fail.

We have impounded the subject steering box and pitman arm and a small container of fluid.

We have enclosed an invoice for services you have requested and we have provided through today. In the event additional services are needed, we will be billing you monthly.

Thank you for allowing us the opportunity to serve you. In the event you need or obtain more information, please call me at 480-598-1234 or e-mail me at mark@marksalem.com.

Sincerely,



Mark Salem

enclosure

OASIS RESULT:

1FTSW21P77E [REDACTED]

10/03/2008
11:54:08
FCXWS446

© Copyright 2002-2008 Ford Motor Company. All rights reserved.

VEHICLE INFORMATION

VEHICLE DESCRIPTION
2007 F-SERIES
TRANSMISSION
TORQSHIFT

BODY STYLE
F-250 CREW CAB 4X4
AXLE CODE
3L

ENGINE
6.0L DIESEL DI V8
ENGINE CALIBRATION
6F710H0A

NO WARNING MESSAGES FOUND FOR THIS VIN

ARN MESSAGES

ATTENTION TECHNICIANS AND SERVICE MANAGERS:
BEFORE REPLACING 6.0L CYLINDER HEAD GASKETS REFER TO 08-11-03
BEFORE REPLACING 6.0L TURBOCHARGER OR VGT SOLENOID REFER TO 08-16-13
BEFORE REPLACING FUEL INJECTORS FOR COLD ENGINE OPERATION SEE TSB 07-05-04

GENERAL WARRANTY INFORMATION

WARRANTY START DATE **BUILD DATE** **SALE MILEAGE**
04/27/2007 12/04/2006 00034

OUTSTANDING FIELD SERVICE ACTIONS

NO CAMPAIGN MESSAGE(S) FOUND

EXTENDED COVERAGES

NO ESP INFORMATION AVAILABLE

WARRANTY REPAIR HISTORY

02/21/2008

DEALER: Don Sanderson Ford Lincoln Mer

WARRANTY CLAIM NUMBER: [REDACTED] ODOMETER: 009747M

PART NUMBER	PART DESCRIPTION	QUANTITY	LABOR OP	CONDITION CODE	CONDITION DESC
6C3Z 6C840B	CONNECTION A/C DUCT	001	6005F	01	BROKEN/CRACKED
		000	6005F1		
		000	6005F38		
		000	6646AH		
		000	6005F1X1		

PRELIMINARY TEST INSPECTION OK RETRIEVE.KOEO SELF TEST P0299,P2263 TURBO BOO ST VVT TEST FAILS INSPECT CAC TUBE.HOT SIDE LOWER CAC TUBE LEAKING.REPLACE D TUBE CLEAR CODES.ROAD TEST BOOST 24PSI.RETEST PASS.

02/21/2008

DEALER: Don Sanderson Ford Lincoln Mer

WARRANTY CLAIM NUMBER: [REDACTED] ODOMETER: 009747M

PART NUMBER	PART DESCRIPTION	QUANTITY	LABOR OP	CONDITION CODE	CONDITION DESC
FRONT	FRONT END ALIGNMENT	000	3001A	W6	WHEEL ALIGNMENT OUT OF SPECIFICATION
		000	3001A6		

ROAD TEST. UNABLE TO VERIFY LOOSENESS OR ROAD WILD CONDITION STEERING WHEEL SLIGHTLY OFF CENTER. CHECK STEERING AND SUSPENSION. FOUND NO ABNORMAL LOOSENESS. CHECK ALIGNMENT. CORRECT TOE AND RECENTER STEERING WHEEL. ROAD TEST.

02/21/2008

DEALER: Don Sanderson Ford Lincoln Mer

WARRANTY CLAIM NUMBER: ODOMETER: 009747M

PART NUMBER	PART DESCRIPTION	QUANTITY	LABOR OP	CONDITION CODE	CONDITION DESC
TAP1	MISC	000		82	FREIGHT/POSTAGE/MAINTENANCE

COURTESY CLAIM FOR TRANSPORTATION ASSISTANCE. CUSTOMER RENTED A FOCUS.

02/21/2008

DEALER: Don Sanderson Ford Lincoln Mer

WARRANTY CLAIM NUMBER ODOMETER: 009747M

PART NUMBER	PART DESCRIPTION	QUANTITY	LABOR OP	CONDITION CODE	CONDITION DESC
2C3Z99291A41BAA	MOULDING (BDY SD OUT	001	MT291A40	33	LOOSE PART
2C3Z99291A40BAA	MOULDING (BDY SD OUT	001			

M-TIME TO REPLACE BOTH BED RAIL MOULDINGS. CURLING AT ENDS

[Click Here for Full Warranty History](#)

END OF OASIS REPORT FOR 1FTSW21P77E

Report Applies to Country Code: USA

Claim Detail Report

Model Year = 2007 Claim Key = [REDACTED]

Vehicle Information

Model Year: 2007
 Market Derived: F - FORD
 Body/Cab Type: T/BC - DOUBLE CAB (CREW CAB)
 Version/Series: T/BD-250 SERIES
 Drive Type: T/E-4 WHL L/H PART TIME DRIVE
 Vehicle Line: T/F7-F250HD/350/450/550 [99-09]
 Warranty Start Date: 27-APR-2007
 Production Date: 04-DEC-2006
 VIN: 1FTSW21P77[REDACTED]

Claim Information

Document Number: [REDACTED]
 Repair Date: 21-FEB-2008
 Distance: 9747
 TIS: 11

Dealer Information

Dealer Name: DON SANDERSON FORD LINCOLN MER
 Dealer Code: 20301 - *
 Address: 6400 N 51ST AVE.
 City: GLENDALE
 State: AZ / Zip Code: 85301
 Country: USA Region Code: NA
 Phone: (623)860-8600

Cust. Concern Code: C50 - OTHER STEERING/HANDLING AND RIDE TROUBLES

Condition Code: W6 - WHEEL ALIGNMENT OUT OF SPECIFICATION

Technician Comment: ROAD TEST. UNABLE TO VERIFY LOOSENESS OR ROAD WILD CONDITION STEERING WHEEL SLIGHTLY OFF CENTER. CHECK STEERING AND SUSPENSION. FOUND NO ABNORMAL LOOSENESS. CHECK ALIGNMENT. CORRECT TOE AND RE-CENTER STEERING WHEEL. ROAD TEST.

Customer Comment: (P)SUS STEERING FEELS LOOSE AND WANTS TO WANDER WHEN DRIVING

<u>Labor Op Code</u>	<u>Labor Op Description</u>
----------------------	-----------------------------

PE13-014 000193LCPV

3001A CASTER, CAMBER, TOE-IN CHECK
 3001A6 TOE-IN CORRECT

Causal Flag	Full Part Number	Part Description	Part CPSC	Part Quantity
Y	* FRONT *	FRONT END ALIGNMENT	040001	0

PE13-014 000194LCPV

Mar 3 2007 3009

ADOT USE ONLY

ARIZONA TRAFFIC ACCIDENT REPORT		REPORT ID				Agency Report Number	
1 Police Only: FORWARD COPY TO: ADOT TRAFFIC RECORDS SECTION 064R 206 S. 17th AVE., PHOENIX, ARIZONA, 85007-3233		YEAR MONTH DAY	2007/03/11	HOURL	1115	NCIC NO.	0799
		OFFICER ID NO.	5558		Total No. of Sheets: 3		

2 **COMPLETE THE FOLLOWING SUPPLEMENT IF ANY (circle) AND ANY (diamond) ARE CHECKED**

Total Units	1	Total Injuries	1	Total Fatalities	0	Estimated Total Damage Compared to Limit	<input checked="" type="checkbox"/> Over <input type="checkbox"/> Under	Fatal <input type="checkbox"/> Govt. <input type="checkbox"/> <input checked="" type="radio"/> Persons Transported for Immediate Medical Care?	District or Grid No.	1 2 0 4
								<input checked="" type="checkbox"/> Tow away at Least One (1) Vehicle from Scene?		

3 **LOCATION**

On Highway / Road / Street: I-17 SB

Intersecting Street, Road / M.P. or R.P.: M.P. 309.5

City: CAMP VERDE, YAVAPAI

Distance: Measured Miles Approximate Feet

1 **TRAFFIC UNIT NO. 1**

State: AZ Class: D End: [redacted] DL SSN BOTH

Restrictions: [redacted] Date of Birth: [redacted] Address: FLAGSTAFF, AZ City: FLAGSTAFF, AZ State: AZ Zip Code: [redacted] Telephone No. (w/Area Code): [redacted]

Plate Number: [redacted] State: AZ Year: Sep-07 Same Owner / Carrier Name as Driver

Body Style: PICKUP Make: FORD Color: WHT Year: 2006 VIN: 1FTSW21P78E Safety Device Code: 3

Removed to: FLAGSTAFF Removed by: CONTINENTAL HEAVY Orders of OWNER Posted Speed Limit: 75 Ctr. Est. Speed: 65

Insurance Company: WESTERN AGRICULTURAL INS. Telephone Number (w/Area Code): (480) 635-3600 Policy Number: [redacted] Effective Date: 4/2/2006 Expiration Date: 4/2/2007

Trailer (Other Unit) Plate No.: R81954 State: AZ Year: 2007 Description of Trailer or Other Unit: WHT TOY HAULER, 35' G.V.W. (Registered) Yes No of Power Unit Greater than 10k pounds? Yes No HazMat Placard Yes No 4-Digit: [redacted] 1-Digit: [redacted] Was HazMat Yes Carro Yes No Released?

4 **TRAFFIC UNIT NO. 2**

State: [redacted] Class: [redacted] End: [redacted] DL SSN BOTH

Restrictions: [redacted] Date of Birth: [redacted] Address: [redacted] City: [redacted] State: [redacted] Zip Code: [redacted] Telephone No. (w/Area Code): [redacted]

Plate Number: [redacted] State: [redacted] Year: [redacted] Same Owner / Carrier Name as Driver

Body Style: [redacted] Make: [redacted] Color: [redacted] Year: [redacted] VIN: [redacted] Safety Device Code: [redacted]

Removed to: [redacted] Removed by: [redacted] Orders of [redacted] Posted Speed Limit: [redacted] Ctr. Est. Speed: [redacted]

Insurance Company: [redacted] Telephone Number (w/Area Code): [redacted] Policy Number: [redacted] Effective Date: [redacted] Expiration Date: [redacted]

Trailer (Other Unit) Plate No.: [redacted] State: [redacted] Year: [redacted] Description of Trailer or Other Unit: [redacted] G.V.W. (Registered) Yes No of Power Unit Greater than 10k pounds? Yes No HazMat Placard Yes No 4-Digit: [redacted] 1-Digit: [redacted] Was HazMat Yes Carro Yes No Released?

4 **TRAFFIC UNIT NO. 3**

State: [redacted] Class: [redacted] End: [redacted] DL SSN BOTH

Restrictions: [redacted] Date of Birth: [redacted] Address: [redacted] City: [redacted] State: [redacted] Zip Code: [redacted] Telephone No. (w/Area Code): [redacted]

Plate Number: [redacted] State: [redacted] Year: [redacted] Same Owner / Carrier Name as Driver

Body Style: [redacted] Make: [redacted] Color: [redacted] Year: [redacted] VIN: [redacted] Safety Device Code: [redacted]

Removed to: [redacted] Removed by: [redacted] Orders of [redacted] Posted Speed Limit: [redacted] Ctr. Est. Speed: [redacted]

Insurance Company: [redacted] Telephone Number (w/Area Code): [redacted] Policy Number: [redacted] Effective Date: [redacted] Expiration Date: [redacted]

Trailer (Other Unit) Plate No.: [redacted] State: [redacted] Year: [redacted] Description of Trailer or Other Unit: [redacted] G.V.W. (Registered) Yes No of Power Unit Greater than 10k pounds? Yes No HazMat Placard Yes No 4-Digit: [redacted] 1-Digit: [redacted] Was HazMat Yes Carro Yes No Released?

5 **PASSENGERS**

Unit No.	Seat No.	Sex	Age	Int. Sev.
1	3	3	[redacted]	3
1	5	5	[redacted]	1

City: FLAGSTAFF, AZ State: AZ Zip Code: [redacted] Age: 42 M Int. Sev.: 3

City: FLAGSTAFF, AZ State: AZ Zip Code: [redacted] Age: 3 F Int. Sev.: 1

6 **Other Property Damage**

1 DELINEATOR

Owner's Name: ADOT Address: PHOENIX, AZ State: AZ Telephone Number (w/Area Code): [redacted]

7 **WITNESSES**

Name: [redacted] Address: [redacted] City: [redacted] State: [redacted] Telephone Number: [redacted] Age: [redacted]

8 **PHOTOS**

Photos Taken: Yes No

Photographer's Name: SGT. R. HARDT ID Number: 3393 Agency Name: AZ DPS Investigation at Scene: Yes No Date Investigated: 3/11/2007 Time Investigated: 1123

Officer's Signature: J. L. LEONARD Badge No.: 5558 Agency Name: Arizona Department of Public Safety Date Completed: [redacted]

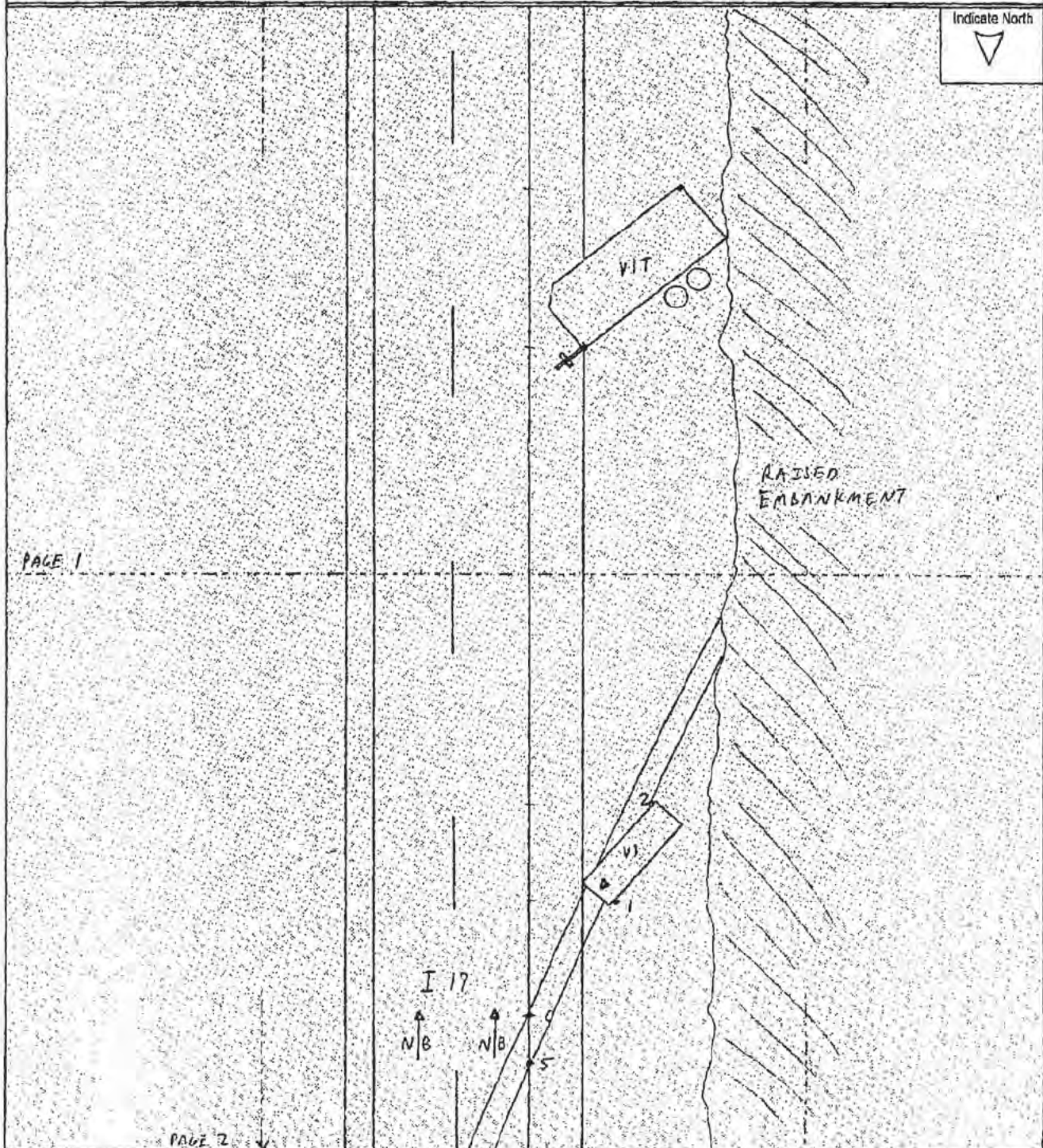
9 - DIAGRAM		2007-013981		10 - INDICATE NORTH	11 - SKIDDING OCCURRED VEHICLE YES <input type="checkbox"/> 1 <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> NO <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
SEE ATTACHED DIAGRAM					12 - CITATIONS UNIT NO. A.R.S. NO. OR CITY CODE
					14 - PRIOR ACTION a YES <input type="checkbox"/> NO <input type="checkbox"/> b RIGHT <input type="checkbox"/> TO FIRST HARMFUL EVENT c LEFT <input type="checkbox"/> UNIT NO.
					15 - MANNER OF COLLISION CHECK ONLY ONE (1) 1 <input type="checkbox"/> SINGLE VEHICLE 2 <input type="checkbox"/> ANGLE 3 <input type="checkbox"/> LEFT TURN 4 <input type="checkbox"/> RIGHT TURN 5 <input type="checkbox"/> U-TURN 6 <input type="checkbox"/> REAR-END 7 <input type="checkbox"/> HEAD-ON 8 <input type="checkbox"/> SIDESWIPE (SAME DIRECTION) 9 <input type="checkbox"/> SIDESWIPE (OPPOSITE DIRECTION) 10 <input type="checkbox"/> BACKING 11 <input type="checkbox"/> NON-CONTACT MOTORCYCLE 12 <input type="checkbox"/> NON-CONTACT NON-MOTORCYCLE 13 <input type="checkbox"/> PEDESTRIAN 14 <input type="checkbox"/> PEDALCYCLE 15 <input type="checkbox"/> OTHER
13 - DESCRIBE WHAT HAPPENED D1 STATED THAT SHE WAS SB ON I-17 AT ABOUT 65 MPH IN THE POSTED 75 MPH ZONE AT 309.5 ON I-17. SHE SAID THAT SHE FELT THE TRAILER BEGIN TO SWAY AND WAS UNABLE TO REGAIN CONTROL. SHE THOUGHT THAT A GUST OF WIND MAY HAVE CAUSED THE SWAYING. V1T SEPARATED FROM V1. V1 WENT OFF THE RIGHT SHOULDER, STRUCK THE EMBANKMENT, AND ROLLED 1 TIME COMING TO REST UPRIGHT. V1T ALSO WENT OFF THE RIGHT SHOULDER AND STRUCK THE EMBANKMENT. IT ROLLED 1/4 TIME COMING TO REST ON IT'S RIGHT SIDE. D1 SUSTAINED A BROKEN ARM, WARREN HOWARD SUSTAINED A BROKEN FINGER. ALLY HOWARD WAS UNINJURED. V1 AND V1T WERE REMOVED BY CONTINENTAL HEAVY HAUL PER THE OWNERS REQUEST. INJURED TAKEN TO / BY FLAGSTAFF MEDICAL CENTER BY PINWOOD FD AMBULANCE					16 - TRAFFIC UNIT ACTION CHECK ONE (1) PER UNIT 1 1 <input type="checkbox"/> GOING STRAIGHT AHEAD 2 <input type="checkbox"/> SLOWING IN TRAFFICWAY 3 <input type="checkbox"/> STOPPED IN TRAFFICWAY 4 <input type="checkbox"/> MAKING LEFT TURN 5 <input type="checkbox"/> MAKING RIGHT TURN 6 <input type="checkbox"/> MAKING U TURN 7 <input type="checkbox"/> ENTERING ALLEY OR DRIVEWAY 8 <input type="checkbox"/> LEAVING ALLEY OR DRIVEWAY 9 <input type="checkbox"/> OVERTAKING / PASSING 10 <input type="checkbox"/> CHANGING LANES 11 <input type="checkbox"/> BACKING 12 <input type="checkbox"/> AVOIDING VEHICLE, OBJECT, PEDESTRIAN 13 <input type="checkbox"/> ENTERING PARKING POSITION 14 <input type="checkbox"/> LEAVING PARKING POSITION 15 <input type="checkbox"/> PROPERLY PARKED 16 <input type="checkbox"/> IMPROPERLY PARKED 17 <input type="checkbox"/> DRIVERLESS MOVING VEHICLE 18 <input type="checkbox"/> CROSSING ROAD 19 <input type="checkbox"/> WALKING WITH TRAFFIC 20 <input type="checkbox"/> WALKING AGAINST TRAFFIC 21 <input type="checkbox"/> STANDING 22 <input type="checkbox"/> LYING 23 <input type="checkbox"/> GETTING ON OR OFF VEHICLE 24 <input type="checkbox"/> WORKING ON OR PUSHING VEHICLE 25 <input type="checkbox"/> WORKING ON ROAD 26 <input type="checkbox"/> OTHER 27 <input type="checkbox"/> UNKNOWN
16 - LIGHT CONDITION CHECK ONLY ONE (1) 1 <input type="checkbox"/> DAYLIGHT 2 <input type="checkbox"/> DAWN OR DUSK 3 <input type="checkbox"/> DARKNESS YES NO 1 <input type="checkbox"/> STREET LIGHT 2 <input type="checkbox"/> STREET LIGHT FUNCTIONING	21 - SPECIAL CONDITION CHECK ONLY ONE (1) 1 <input type="checkbox"/> SCHOOL CROSSING 2 <input type="checkbox"/> PEDESTRIAN CROSSWALK (STRIPE) 3 <input type="checkbox"/> PEDESTRIAN CROSSWALK (NO STRIPPING) 4 <input type="checkbox"/> BRIDGE 5 <input type="checkbox"/> TUNNEL 6 <input type="checkbox"/> RR CROSSING 7 <input type="checkbox"/> GORE AREA 8 <input type="checkbox"/> BIKE PATH 9 <input type="checkbox"/> 2-WAY LEFT TURN LANE	24 - NON-INTERSECTION ROAD CHARACTER CHECK ONLY ONE (1) 1 <input type="checkbox"/> 2-WAY, STRIPED CENTERLINE 2 <input type="checkbox"/> 2-WAY, NO STRIPE 3 <input type="checkbox"/> 2-WAY, PAINTED MEDIAN 4 <input type="checkbox"/> 2-WAY, RAISED MEDIAN 5 <input type="checkbox"/> 2-WAY, CONCRETE BARRIER 6 <input type="checkbox"/> 2-WAY, CABLE BARRIER 7 <input type="checkbox"/> 2-WAY, DEPRESSED MEDIAN 8 <input type="checkbox"/> 2-WAY, EXTENDED MEDIAN 9 <input type="checkbox"/> 1-WAY STREET	25 - ROAD GRADE CHECK ONLY ONE (1) 1 <input type="checkbox"/> LEVEL 2 <input type="checkbox"/> DOWNGRADE 3 <input type="checkbox"/> UPGRADE 4 <input type="checkbox"/> HILLCREST 5 <input type="checkbox"/> DIP	26 - VIOLATIONS / BEHAVIOR TWO (2) CHOICES PER PERSON MAY BE SELECTED 1 1 <input type="checkbox"/> NO IMPROPER ACTION 2 <input type="checkbox"/> SPEED TOO FAST FOR CONDITIONS 3 <input type="checkbox"/> EXCEEDED LAWFUL SPEED 4 <input type="checkbox"/> FAILED TO YIELD RIGHT-OF-WAY 5 <input type="checkbox"/> FOLLOWED TOO CLOSELY 6 <input type="checkbox"/> RAN STOP SIGN 7 <input type="checkbox"/> DISREGARDED TRAFFIC SIGNAL 8 <input type="checkbox"/> MADE IMPROPER TURN 9 <input type="checkbox"/> DROVE IN OPPOSING TRAFFIC LANE 10 <input type="checkbox"/> KNOWINGLY OPERATED WITH FAULTY OR MISSING EQUIPMENT 11 <input type="checkbox"/> REQUIRED MOTORCYCLE SAFETY EQUIPMENT NOT USED 12 <input type="checkbox"/> PASSED IN NO PASSING ZONE 13 <input type="checkbox"/> UNSAFE LANE CHANGE 14 <input type="checkbox"/> OTHER UNSAFE PASSING 15 <input type="checkbox"/> INATTENTION 16 <input type="checkbox"/> DID NOT USE CROSSWALK 17 <input type="checkbox"/> WALKED ON WRONG SIDE OF ROAD 18 <input type="checkbox"/> OTHER 19 <input type="checkbox"/> UNKNOWN	
17 - WEATHER CONDITIONS CHECK ONLY ONE (1) 1 <input type="checkbox"/> CLEAR 2 <input type="checkbox"/> CLOUDY 3 <input type="checkbox"/> SLEET / HAIL 4 <input type="checkbox"/> RAIN 5 <input type="checkbox"/> SNOW 6 <input type="checkbox"/> SEVERE CROSSWINDS 7 <input type="checkbox"/> BLOWING SAND, SOIL, DIRT, SNOW 8 <input type="checkbox"/> FOG, SMOG, SMOKE	22 - UNUSUAL ROAD CONDITION CHECK ONLY ONE (1) 1 <input type="checkbox"/> UNDER CONSTRUCTION, TRAFFIC ALLOWED 2 <input type="checkbox"/> UNDER CONSTRUCTION, NO TRAFFIC ALLOWED 3 <input type="checkbox"/> UNDER REPAIRS 4 <input type="checkbox"/> HOLES, RUTS, BUMPS 5 <input type="checkbox"/> OBSTRUCTION - PROTECTED 6 <input type="checkbox"/> OBSTRUCTION - UNPROTECTED 7 <input type="checkbox"/> OBSTRUCTION - UNLIGHTED AT NIGHT 8 <input type="checkbox"/> DEFECTIVE SHOULDERS 9 <input type="checkbox"/> CHANGING ROAD WIDTH 10 <input type="checkbox"/> WATER (STANDING OR MOVING)	28 - ROAD SURFACE CONDITION CHECK ONLY ONE (1) 1 <input type="checkbox"/> DRY 2 <input type="checkbox"/> WET 3 <input type="checkbox"/> SAND, MUD, DIRT, DIL., GRAVEL 4 <input type="checkbox"/> SNOW 5 <input type="checkbox"/> SLUSH 6 <input type="checkbox"/> ICE 7 <input type="checkbox"/> OTHER 8 <input type="checkbox"/> UNKNOWN	29 - ROAD SURFACE CONDITION CHECK ONLY ONE (1) 1 1 <input type="checkbox"/> DRY 2 <input type="checkbox"/> WET 3 <input type="checkbox"/> SAND, MUD, DIRT, DIL., GRAVEL 4 <input type="checkbox"/> SNOW 5 <input type="checkbox"/> SLUSH 6 <input type="checkbox"/> ICE 7 <input type="checkbox"/> OTHER 8 <input type="checkbox"/> UNKNOWN	29 - VEHICLE CONDITION TWO (2) CHOICES PER PERSON MAY BE SELECTED 1 1 <input type="checkbox"/> NO APPARENT DEFECTS 2 <input type="checkbox"/> DEFECTIVE BRAKES 3 <input type="checkbox"/> DEFECTIVE STEERING 4 <input type="checkbox"/> DEFECTIVE HEADLIGHTS 5 <input type="checkbox"/> DEFECTIVE TAIL LIGHTS 6 <input type="checkbox"/> DEFECTIVE TURN SIGNAL 7 <input type="checkbox"/> FRACTURE OR BLOWOUT 8 <input type="checkbox"/> ONE OR MORE SMOOTH TIRES 9 <input type="checkbox"/> FIRE 10 <input type="checkbox"/> DEFECTIVE WINDSHIELD WIPER 11 <input type="checkbox"/> DEFECTIVE EXHAUST SYSTEM 12 <input type="checkbox"/> OTHER DEFECTS 13 <input type="checkbox"/> NO TRAILER BRAKES 14 <input type="checkbox"/> UNKNOWN	
18 - ROAD SURFACE TYPE CHECK ONLY ONE (1) 1 <input type="checkbox"/> ASPHALT 2 <input type="checkbox"/> CONCRETE 3 <input type="checkbox"/> GRAVEL 4 <input type="checkbox"/> DIRT 5 <input type="checkbox"/> OTHER	23 - TRAFFIC CONTROL DEVICES LEGEND: A - DEVICE OPERATIONAL B - DAMAGED OR NONFUNCTIONAL PRIOR TO ACCIDENT CHECK ALL THAT APPLY 1 <input type="checkbox"/> TRAFFIC SIGNAL 2 <input type="checkbox"/> YIELD SIGN 3 <input type="checkbox"/> STOP SIGN 4 <input type="checkbox"/> WARNING SIGN 5 <input type="checkbox"/> RAILROAD SIGNAL 6 <input type="checkbox"/> FLASHING SIGNAL 7 <input type="checkbox"/> FLAGMAN OR OFFICER	27 - CONDITIONS INFLUENCING DRIVER TWO (2) CHOICES PER PERSON MAY BE SELECTED 1 1 <input type="checkbox"/> NO APPARENT INFLUENCE 2 <input type="checkbox"/> HAD BEEN DRINKING 3 <input type="checkbox"/> USE OF ILLEGAL DRUGS 4 <input type="checkbox"/> ILLNESS 5 <input type="checkbox"/> FELL ASLEEP / FATIGUED 6 <input type="checkbox"/> PHYSICAL IMPAIRMENT 7 <input type="checkbox"/> PRESCRIPTION DRUGS 8 <input type="checkbox"/> OTHER 9 <input type="checkbox"/> UNKNOWN	30 - VISION OBSCUREMENT CHECK ONE (1) PER UNIT 1 1 <input type="checkbox"/> NOT OBSCURED 2 <input type="checkbox"/> BY PARKED / STOPPED VEHICLE 3 <input type="checkbox"/> BY MOVING VEHICLE 4 <input type="checkbox"/> BY BUILDING 5 <input type="checkbox"/> BY EMBARRAMENT 6 <input type="checkbox"/> BY SIGNBOARD 7 <input type="checkbox"/> BY HILLCREST 8 <input type="checkbox"/> BY LOAD ON VEHICLE 9 <input type="checkbox"/> BY TREES, BUSHES 10 <input type="checkbox"/> BY HEADLIGHT 11 <input type="checkbox"/> BY SUN GLARE 12 <input type="checkbox"/> BECAUSE OF BAD WEATHER 13 <input type="checkbox"/> OTHER 14 <input type="checkbox"/> RAIN, SNOW, FOG ON WINDSHIELD 15 <input type="checkbox"/> WINDSHIELD OBSCURED - OTHER 16 <input type="checkbox"/> UNKNOWN		
19 - TYPE OF LOCATION CHECK ONLY ONE (1) 1 <input type="checkbox"/> INTERSECTION 2 <input type="checkbox"/> JUNCTION AREA 3 <input type="checkbox"/> NON-JUNCTION AREA 4 <input type="checkbox"/> DRIVEWAY ACCESS 5 <input type="checkbox"/> ALLEY ACCESS 6 <input type="checkbox"/> ALLEY 20 - INTERSECTION RELATED 1 <input type="checkbox"/> YES 2 <input type="checkbox"/> NO	31 - DIRECTION OF TRAVEL CHECK ONE (1) PER UNIT 1 1 <input type="checkbox"/> NORTH 2 <input type="checkbox"/> SOUTH 3 <input type="checkbox"/> EAST 4 <input type="checkbox"/> WEST 5 <input type="checkbox"/> NW 6 <input type="checkbox"/> NE 7 <input type="checkbox"/> SW 8 <input type="checkbox"/> SE 9 <input type="checkbox"/> UNKNOWN				

ARIZONA TRAFFIC ACCIDENT REPORT SUPPLEMENT Forward to: ADOT Traffic Records Section 084R 206 S. 17th Ave., Phoenix, AZ, 85007-3233	ADOT USE ONLY REPORT ID				Agency Report Number [REDACTED]
	Year Month Day 2007/03/11	Hour 1115	NCIC No. 0799	Officer's ID No. 5558	

ACCIDENT DIAGRAM

Measurements are approximate and not to scale
 Measurements are scaled Scale is: 1" = 20'

Indicate North

ADOT USE ONLY

ARIZONA TRAFFIC ACCIDENT REPORT
SUPPLEMENT

Forward to: ADOT Traffic Records Section 064R
208 S. 17th Ave., Phoenix, AZ, 85007-3233

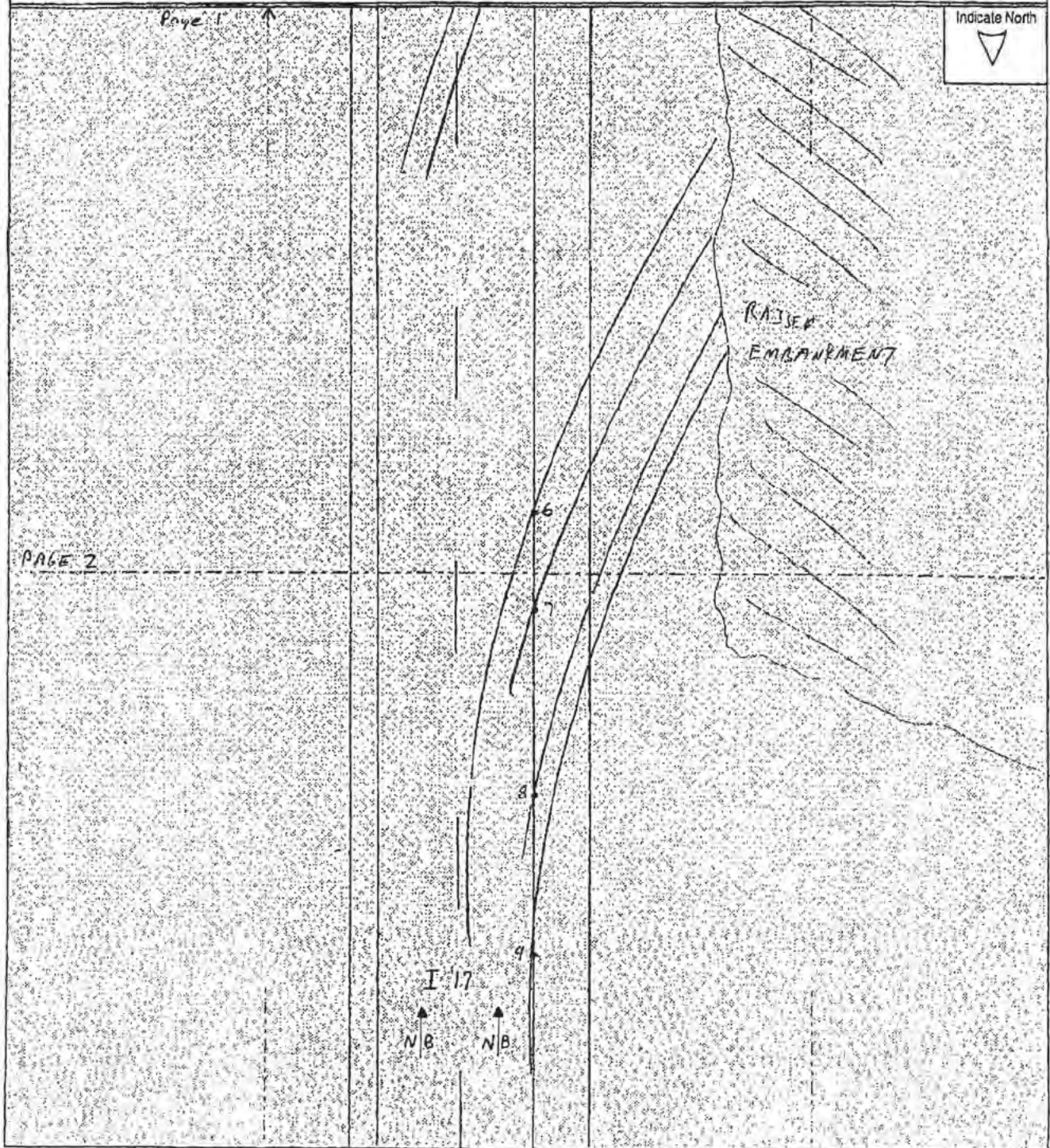
REPORT ID		Year	Month	Day	Hour	NCIC No.	Officer's ID No.
		2007	03	11	1115	0799	5558


Agency Report Number

ACCIDENT DIAGRAM

- Measurements are approximate and not to scale
 - Measurements are scaled
- Scale is: 1" = 20'

Indicate North
▽



7/9/08


ASPEY
WATKINS
& DIESEL
ATTORNEYS
P.L.L.C.

LOUIS M. DIESEL

WRITER'S FAX LINE: 928-774-8404
WRITER'S EMAIL: L.DIESEL@AWDLAW.COM



April 1, 2008

123 N. San Francisco St.
Suite 300
Flagstaff, Arizona 86001
(928) 774-1478
www.awdlaw.com

Ms. Julie Szymanski
Product Claims Department
Ford Motor Company
P. O. Box 70
Dearborn, Michigan 48121-0070

Sedona Office
120 Soldier Pass Road
Sedona, Arizona 86336
(928) 282-5955

Re: [REDACTED] v. *Ford Motor Company*
Date of Loss: March 11, 2007
Vehicle Involved: 2006 Ford F250 Super Duty
VIN Number: 1FTSW21P76E[REDACTED]

Dear Ms. Szymanski:

As you know, I represent [REDACTED] regarding the injuries she received in a one-vehicle accident as a result of the defective steering mechanism in the Ford F-250 that she was driving on March 11, 2007. Enclosed you will find an additional report by Mark Salem of Salem Boys Auto regarding the examination of components of the steering system on her Ford F-250 truck. Again, as you can see, the evidence clearly indicates that there is a defective steering mechanism which caused Ms. [REDACTED] to lose control resulting in the accident.

In the past, I have attempted to contact you and you have failed to respond to my inquiries. Again, I am requesting that you contact me within two weeks of today's date if you wish to resolve this case without expenses of a lawsuit. Our evidence seems to clearly indicate that Ford Motor Company's product is defective. If you have any evidence to the contrary, please advise immediately.

I am also contacting Sanderson Ford, where Ms. [REDACTED] purchased her vehicle, to put them on notice of this potential products liability case.

Ms. Julie Szymanski
April 1, 2008
Page 2

Again, if you wish to avoid litigation of this case, please contact within this two week time period.

Sincerely,

ASPEY, WATKINS & DIESEL, P.L.L.C.



Louis M. Diesel

LMD/kc
Enclosure

REPORT

EXAMINATION OF COMPONENTS OF THE STEERING SYSTEM ON A FORD F-250 TRUCK

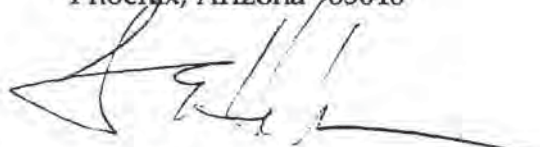
Re: Olsen Grain

Prepared for:

Mark Salem
SALEM BOYS AUTO
1025 West Warner
Tempe, Arizona 85284

Prepared by:

Lester E. Hendrickson, Ph.D.
Forensic Engineering Consultant
SEMTEC LABORATORIES
5025 South 33rd Street
Phoenix, Arizona 85040



February 15, 2008

BACKGROUND

On or about October 2, 2007, several components from the steering gear assembly on a Ford F-250 were received from Mark Salem for examination. According to Mr. Salem, these components were removed from a truck, VIN #1FTSWZ1P761 [REDACTED] owned by [REDACTED] that had been involved in an accident in which loss of control was believed to be caused by an internal problem with the steering box gear.

In addition to these component parts, the steering linkage on the truck was examined on two occasions, December 5, 2007, and again on December 12, 2007.

EXAMINATION

Steering Gear Components

The component parts received are shown in photo #1. They were identified by tags on the bags as #1: Gear Housing; #2: Valve; #3: Sector/Pitman; and #4: 6 Broken Gear Pieces.

Photo #2 shows the gear housing, photo #3 shows the valve, and photo #4 shows the sector gear/pitman shaft. Photos #5 and #6 are closer views of the damaged teeth on the rack gear. The center tooth in photo #5 is sheared off at the root, while the teeth on either side of center show only contact damage at isolated locations on the crown. Also, a large section of metal is broken out of the cylindrical flange on the left end of the gear shown in photo #5. The spline is not twisted or cracked.

Photo #7 shows three pieces that were determined to have broken out of the rack gear. Photos #8 and #9 show these pieces re-positioned on the rack. Black wear patterns are visible on both faces of each tooth. Note that the missing piece from the cylinder is further broken into two, with fragments of the larger piece missing, and contact damage at an isolated location on the smaller piece.

The nature of the damage to the rack gear suggests that wear may have been a factor, and that the damage was caused by multiple loading events rather than a single loading event.

Photo #10 shows the teeth on the sector gear on the pitman shaft. Two are sheared off at the root while the third shows contact damage on the face and crown. Photo #11 is another view of the damage. Photo #12 shows pieces of

teeth that were determined to have broken from the sector gear. Note that one of the two teeth is further broken into two pieces. Photos #13 and #14 show these pieces re-positioned on the sector gear.

It is interesting that two adjacent teeth on the sector gear are sheared, yet on the mating rack gear only one tooth is sheared off, and that is the center tooth. The tooth adjacent to the center is not sheared, however the cylindrical flange on the opposite side of the adjacent tooth is fractured. This damage pattern is inconsistent with damage expected from a single external impact to the system.

The fracture surface on the piece from the center tooth on the rack gear was examined with a scanning electron microscope (SEM). Photo #15 is a general view of the fracture surface at a magnification of 20X. Two distinctly different areas exist, separated by a ridge indicated with a red arrow in the photo. This suggests that two separate cracks were involved in the fracture process, most probably the result of two separate loading events. Photos #16 (at 100X) and #17 (at 500X) shows more details of the fracture surface. Visible in photo #17 is the classic dimple pattern associated with ductile shear fracture.

The interior of the gear housing shown in photo #1 was examined for debris. A clean strip of filter paper was used to swipe the interior in an area where numerous fine particles were discovered. Photo #18, taken through the lens of an optical microscope, shows the oil and fine particles collected on the filter paper. These were inserted into the chamber of the SEM and analyzed using energy dispersive x-ray spectroscopy (EDS).

Photo #19 is an SEM photo at a magnification of about 50X. The bright spotty particles visible in the photo are metal particles. The fibers are from the filter paper. One particle marked EDS1 in photo #19 is about 0.016 inches long and about 0.008 inches wide. This is by far the largest metal particle in the photo. Photo #20 shows the EDS spectrum generated by the particle. The only significant peaks on the spectrum are from iron (Fe). The small silicon (Si) peak is not significant. This result shows that the piece of metal is wear debris from steel, which is predominantly iron.

The area enclosed by the yellow square and marked EDS2 in photo #19 was analyzed by scanning the entire area. Photo #21 shows the resulting EDS spectrum. Since scanning the entire area generates characteristic x-rays from each of the numerous tiny particles within the area, the spectrum gives the chemistry of all particles present. As can be seen in photo #21, the only significant peak on the spectrum is iron (Fe). The large peak on the left end of the spectrum, not labeled, is a carbon peak resulting mostly from the filter paper

with a smaller contribution from oil. These small particles are wear debris from steel parts.

The results of the EDS analysis show conclusively that there was a significant amount of wear debris from steel components in the gear housing.

Inspection of the Vehicle.

The subject vehicle was inspected on two occasions at Salem Brothers Auto. Photo #22 is a general view of the subject vehicle. Photo #23 and #24, taken after the steering gear box had been removed, show the steering linkage with the tie rod ends still attached to the spindle arms. Inspection of the linkage showed no evidence of damage.

The driver's side tie rod end was disconnected from the spindle arm. The spindle is shown in photos #25 and #26. There is no damage to the cast iron spindle arm. The bore in the arm was inspected and the diameter measured in two perpendicular directions and found to be circular. Photo #27 shows the top surface of the spindle arm, while photo #28 shows the bottom surface. The bore is undistorted.

Photo #29 is a view of the driver's side tie rod end, while photo #30 is a closer view of the pin. This pin is not damaged.

CONCLUSIONS

Inspection of the steering linkage on the subject vehicle showed no evidence of any distortion or damage to any of the component parts. These components are the only direct connection to the pitman arm and shaft. Any external impact force to the front end of the vehicle, if transmitted to the gears internal to the steering gear box, would necessarily travel through the steering linkage. If such force was of sufficient magnitude to cause ductile shear fracture of steering gear teeth, component parts of the steering linkage such as the tie rod ends, spindle arm or the splined end of the pitman shaft would, in terms of reasonable scientific probability, also show evidence of distortion and mechanical damage.

Inspection of the fractured teeth on the steering gear showed conclusive evidence that the dominant fracture mode was ductile shear. The nature of the damage to the fractured teeth indicates that multiple force applications caused the damage. The damage is inconsistent with what would be expected from the application of a single impact force.

Evidence of wear was found, but there was no evidence of metal fatigue.

Absent any evidence that an externally applied force acted on the steering system, the alternative explanation for the force that caused the observed steering gear damage is a force generated internally in the power assisted steering system.

Photo Sheet



Photo #1 (See Text)



Photo #2 (See Text)

Photo Sheet



Photo #3 (See Text)



Photo #4 (See Text)

Photo Sheet



Photo #5 (See Text)



Photo #6 (See Text)

Photo Sheet



Photo #7 (See Text)

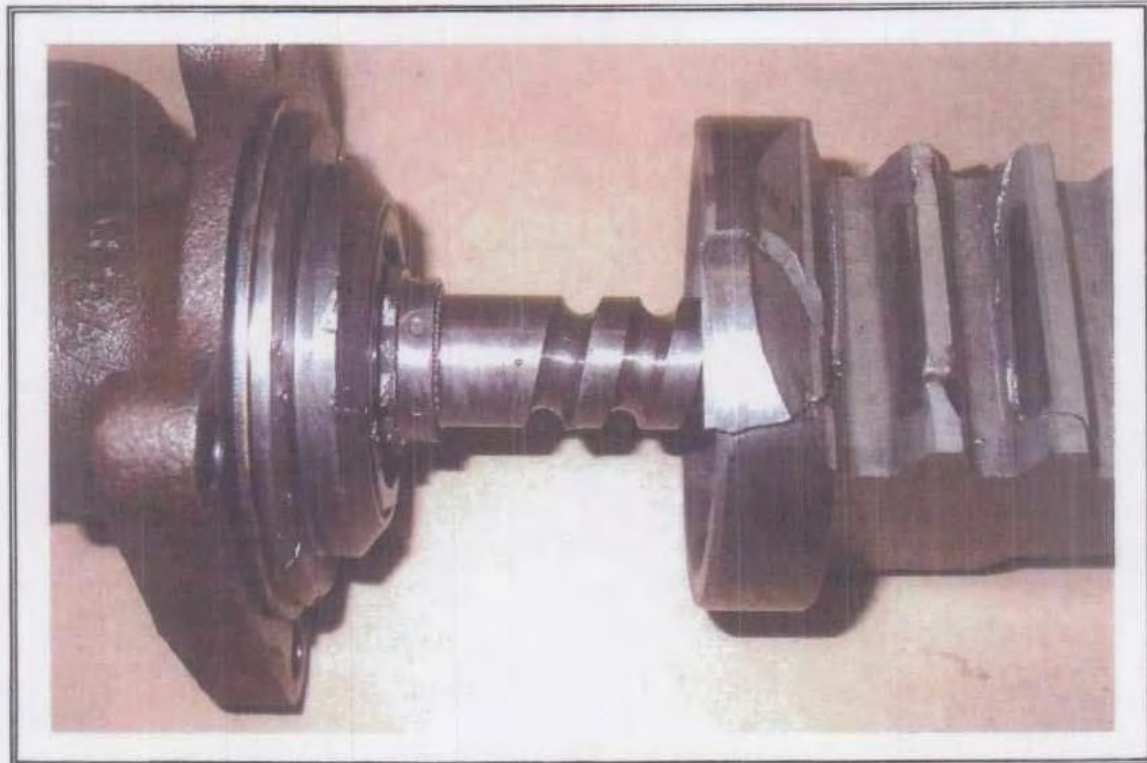


Photo #8 (See Text)

Photo Sheet



Photo #9 (See Text)



Photo #10 (See Text)

Photo Sheet



Photo #11 (See Text)



Photo #12 (See Text)

Photo Sheet

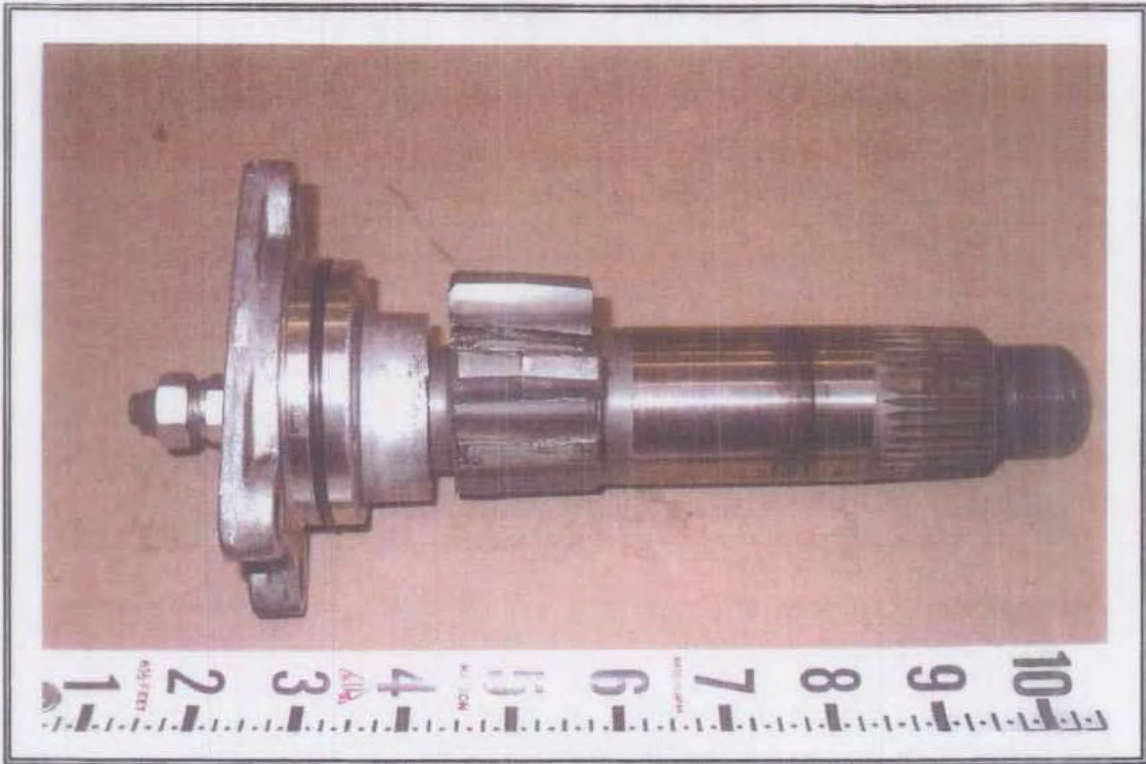


Photo #13 (See Text)



Photo #14 (See Text)

Photo Sheet



Photo #15 (See Text)

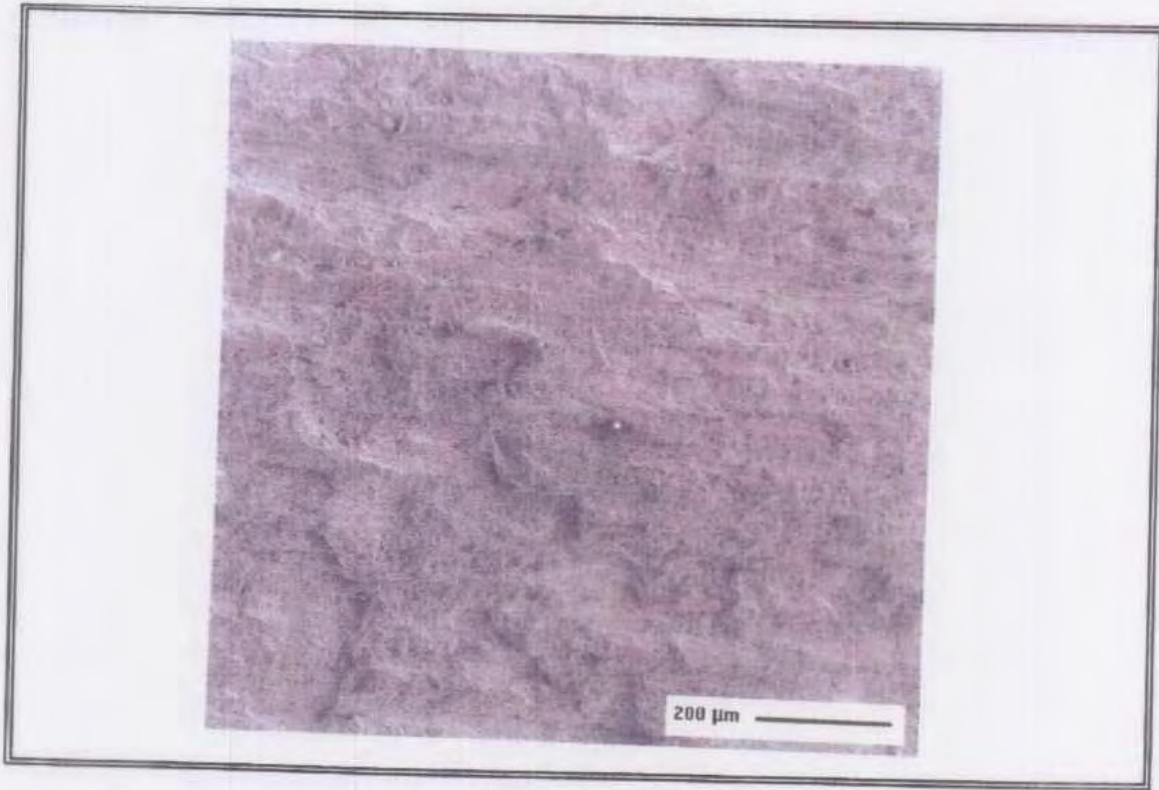


Photo #16 (See Text)

Photo Sheet

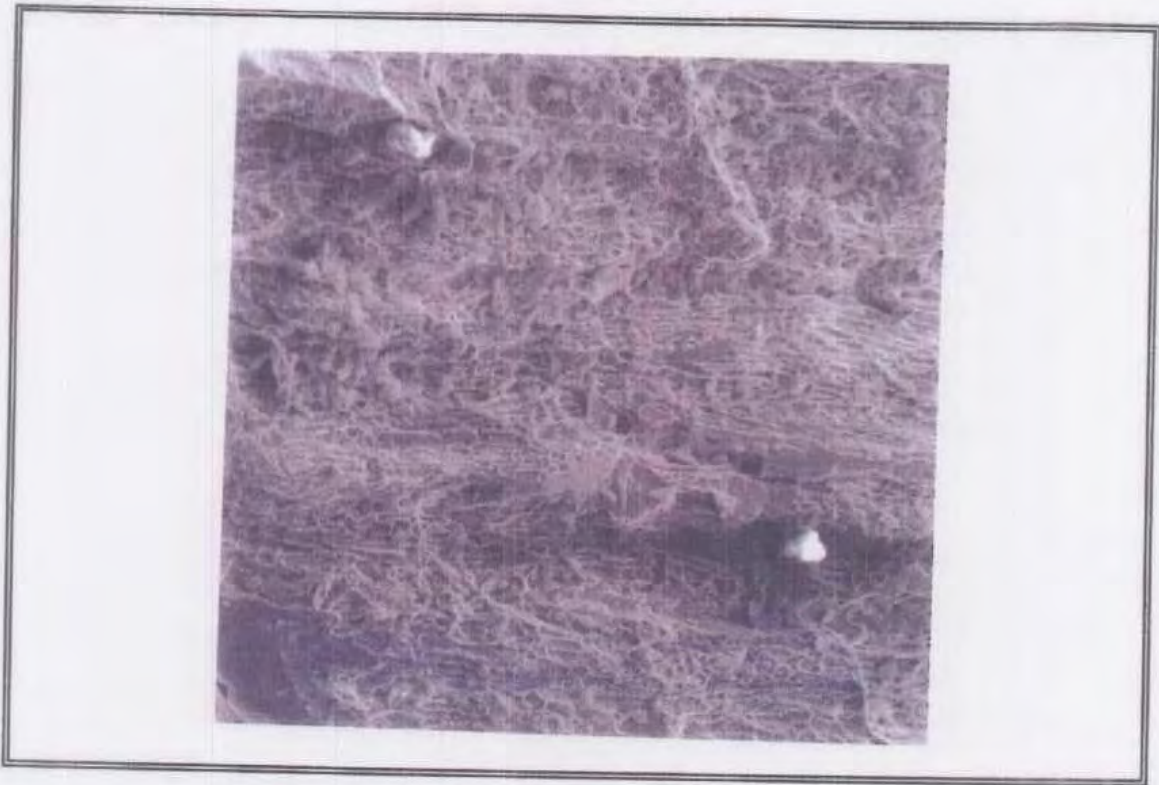


Photo #17 (See Text)



Photo #18 (See Text)

Photo Sheet

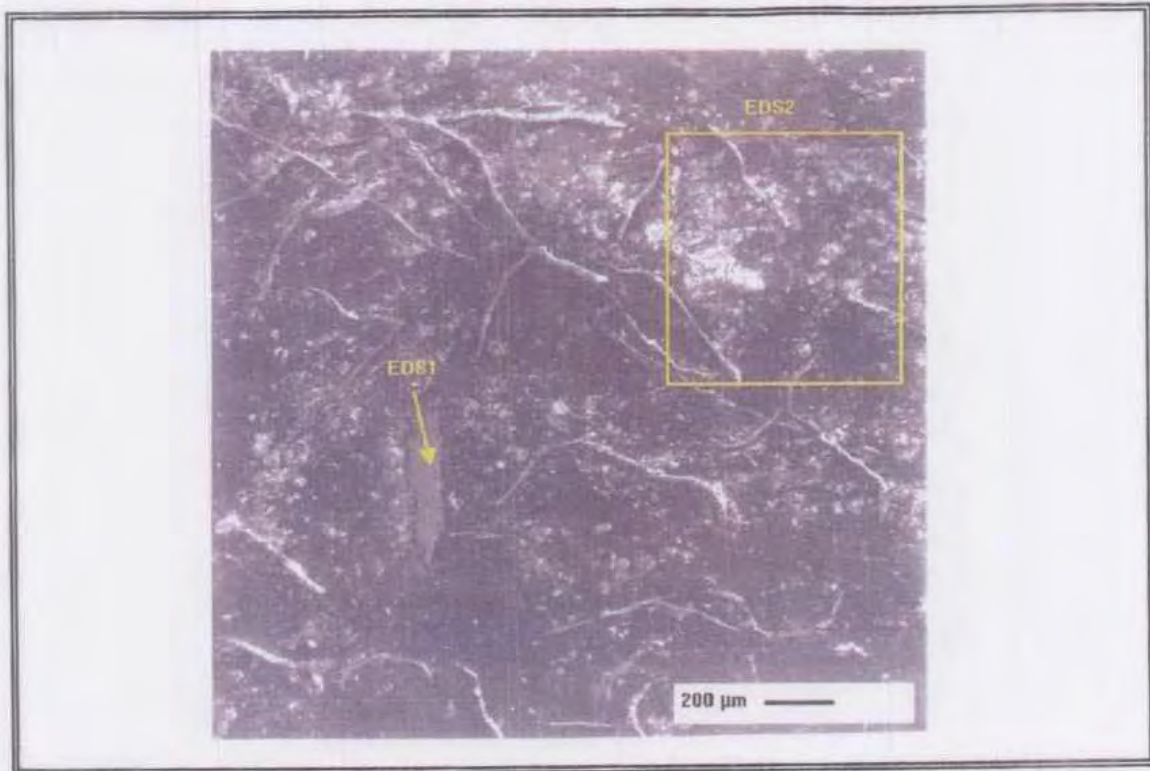


Photo #19 (See Text)

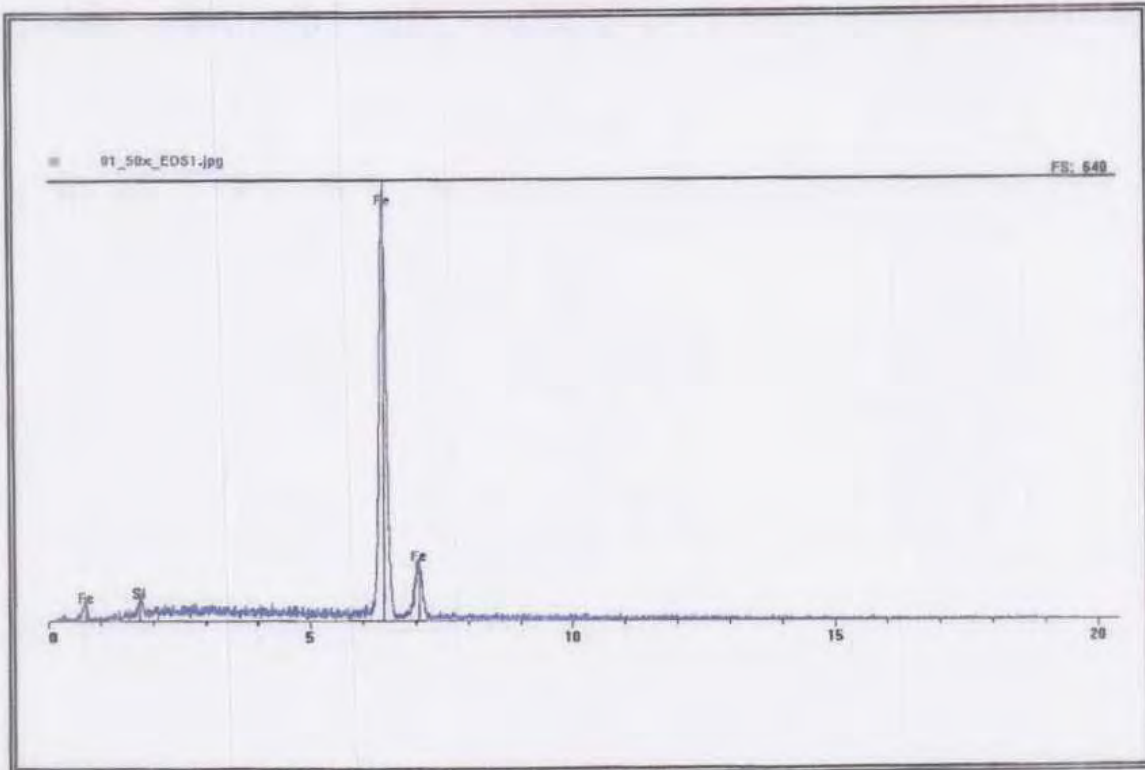


Photo #20 (See Text)

Photo Sheet

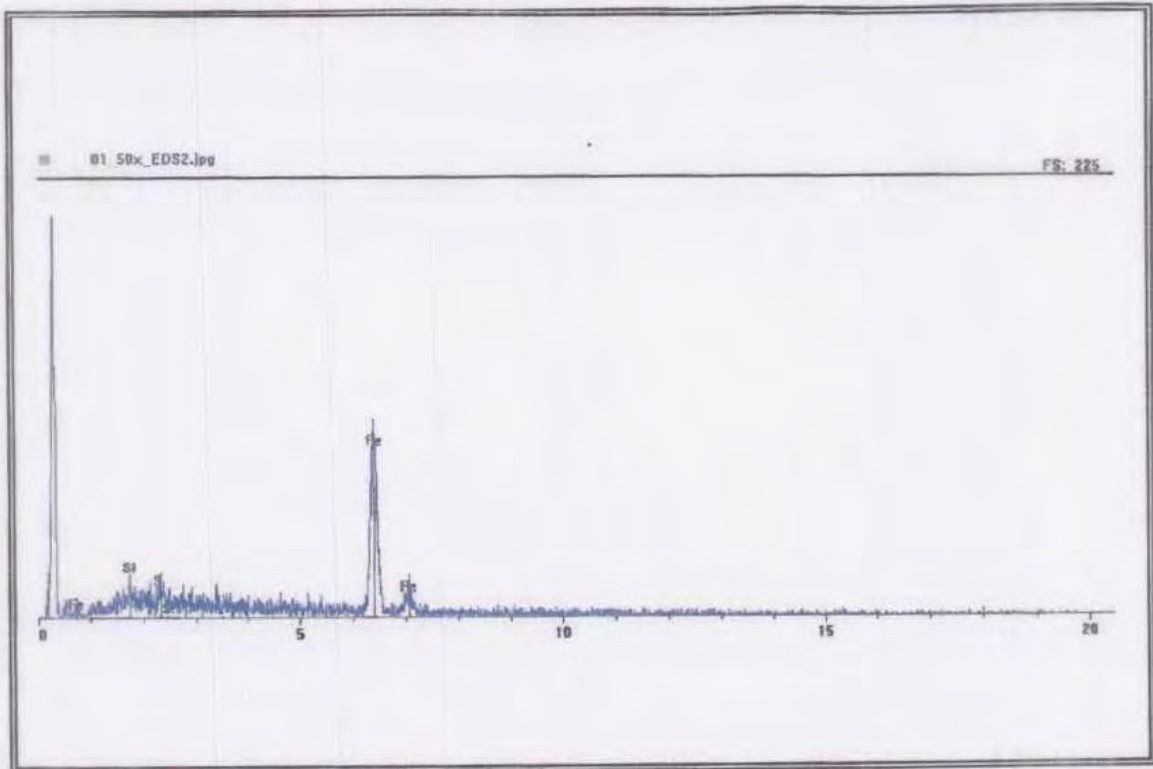


Photo #21 (See Text)



Photo #22 (See Text)

Photo Sheet



Photo #23 (See Text)



Photo #24 (See Text)

Photo Sheet



Photo #25 (See Text)

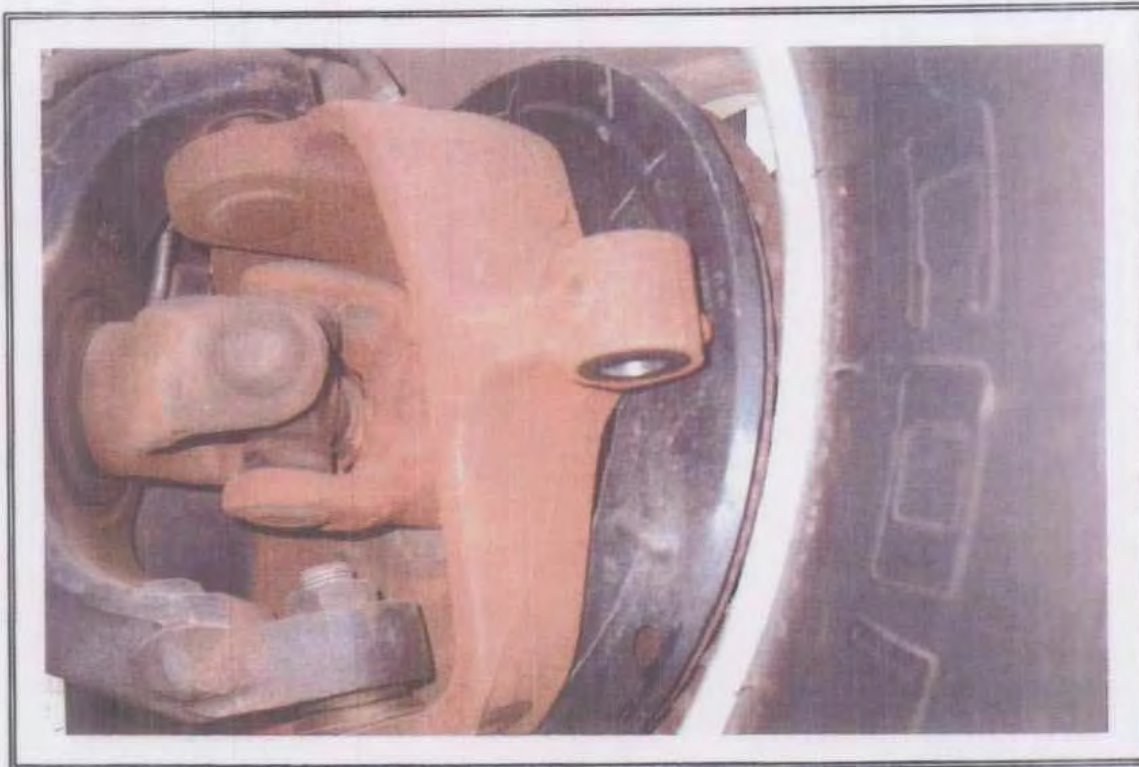


Photo #26 (See Text)

Photo Sheet



Photo #27 (See Text)



Photo #28 (See Text)

Photo Sheet



Photo #29 (See Text)



Photo #30 (See Text)



























