[redacted]

New

January 28, 2005

VIA CERTIFIED (Return Receipt Requested) and REGULAR U.S. MAIL

Ford Motor Company
Parklane Towers West
Three Parklane Boulevard
Dearborn MI 48126-2568
Attention: Steve Norton

FORD MOTOR COMPANY
RECEIVED
FEB 04 2005
OFFICE OF THE
GENERAL COUNSEL

RE: Policyholder: [redacted]
Policy number:
Date of Loss: 01/06/2005

Dear Sir:

This is to advise you that Nationwide Insurance Company has completed an initial investigation involving the following vehicle:

Year: 2001
Make: Ford
Model: F150
VIN: 1FTRX17W51N[redacted]

Our preliminary investigation indicates the above vehicle was parked and sitting unoccupied when it caught on fire. The fire started in the general area of the activation switch near the cruise control area of the truck. In addition, we have been informed of Ford's recent recall due to fires occurring in this area.

This letter will confirm Nationwide Insurance's intent to perform an Origin and Cause Examination on the subject vehicle. While we do not intend to intentionally cause any damage to the vehicle during our examination, there is potential for damage just through handling. I would like to extend the opportunity to you to have your representative present to participate in the examination. During the next 30 days, we will be conducting our destructive examination of the subject vehicle. Should the above date be inconvenient for you or your expert, please contact me so that a mutually convenient date and time can be arranged. Regardless, this examination will take place within thirty (30) days. If you fail to attend this examination, please be advised that Ford Motor Company will waive all possible spoliation claims with regard to Nationwide Insurance's destructive testing of the vehicle. The examination will take place at 1045 Atlanta Highway SE, Winder, GA at Verastar Salvage Facility. Should you have any questions regarding this matter, please contact me at (404) 434-6152

Sincerely,

David Pollock
Special Investigator III
Nationwide Insurance

[redacted]

APR 11 2005

ConnecTec
Site Services

March 31, 2005

APR 2005
OFFICE OF THE GENERAL COUNSEL

Ford Motor Company
Customer Relationship Center
P.O. Box 6248
Dearborn, Michigan 48121

RE: 1997 F-150 Ford Truck; Cruise Control Fire Damage/Destroyed
Vehicle ID # 1FTDX1725V[redacted]

Dear Sir,

I am contacting you regarding the recall news bulletins, which were recently aired by the media, to register a Claim for Reimbursement.

An Engine Fire destroyed the vehicle described above, on February 25, 2005. The vehicle was parked in a garage, for a period of five days without use. The fire started spontaneously, under the hood, at 0600 hours in the morning, without anyone in the area of the truck. A security camera tape of the garage, reviewed by the management company, confirmed that no one was, or had been, tampering with the vehicle. The Fire Department responding to the fire, could not determine the cause of the fire.

The circumstances of this fire match those of other vehicle fires which were caused by the Cruise Control Module, under the hood. As the attached Insurance Valuation Report shows, this vehicle was equipped with Cruise Control.

My insurance company, Progressive Commercial Insurance, covered the fire and a copy of this letter has been forward to them. However, my deductible was One Thousand Dollars, ($ 1,000.00) and I would like to file a claim in that amount. Please forward any and documentation that may be required to the address shown below.

Sincerely,

Kerry R. Koths
V.P. Operations
ConnecTec Site Services

- 97 F-150
- VIN
- 10/1/96
- 24/30,000
- 2/25/05

Cc: Progressive Ins.
Attachments

05 APR -6 A7:34

1600 South Main Plaza, Suite 227 • Walnut Creek, California 94596
Phone (925) 943-1998 • Fax (925) 935 8007 • Email: kkoths@connectec.net

Vehicle Valuation Report

March 2, 2005
Claim Number: [redacted]

Claim Information

Insurance Co.	Progressive Insurance-10940 White Rock Road-Rancho Cordova, CA 95670		
Lien Holder		Loss Type	Collision
Policy Number		Loss Date	2/25/2005
Deductible	$0.00	Report Date	3/2/2005
Owner	Connected ITC Company	Inspected By	Jerry Hummel

Vehicle Identification / Loss Vehicle

Vehicle	1997 Ford F150 Pickup XL 2 Dr PkupXCb 7" Bed 138" WB 4.2L Inj 6 Cyl 2WD		
VIN	1FTDX1725V[redacted]	License	
Odometer	155841	State	CA
		Expiration	3/1/05

Manufacturer's Standard Equipment / Loss Vehicle
4.2L EFI V6 engine
5-speed manual transmission w/OD
Pwr steering
Pwr front disc/rear drum brakes
Rear-wheel anti-lock brake system
Electronic AM/FM stereo radio w/4 speakers, digital clock

Optional Equipment / Equipment Packages Specific to Loss Vehicle
4-SPEED ELECTRONIC AUTOMATIC TRANSMISSION W/OD
AIR CONDITIONING
CHROME REAR STEP BUMPER W/5000# TOW RATING
SPEED CONTROL/TILT STEERING WHEEL
Compact Disc Player-Single

Market Value Calculation

The *market value* is calculated by comparing this vehicle to verified 1997 and 1998 - FordF150 Pickup vehicles for sale in the vehicle owner's local area within 30 days of the search date. The appropriate adjustments for differences between vehicles have been made to establish market value.

Market Value **$5,741.33**
For detailed information on comparable vehicles found in the local area, please refer to the **Comparable Vehicle** attachments included in this settlement report.

Notes
None.

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[redacted]

Cotton States INSURANCE
244 Perimeter Center Parkway N.E. Atlanta, Georgia 30346
Mailing Address: P.O. Box 105303 Atlanta, Georgia 30348
Phone: 770-391-8600
www.cottonstatesinsurance.com

APR 11 2005

April 7, 2005

Ford Motor Company
Attn: Julie Szymanski
Parklake Towers West
Suite 300
Three Parklane Blvd.
Dearborn, MI 48126-2568

RE:
Our Insured: [redacted]
Date of Loss: *08-03-2004*
Our Claim #: [redacted]

Dear Ms. Szymanski,

Enclosed you will find a copy of the statement taken from [redacted] *regarding the details of the fire to the 2001 Ford Pickup, color photos, and answers to most of the questions you have asked.*

We do not have a cause and origin report to send to you. The vehicle was sold as salvage to Asberry Used Cars 6231 McCormick Road, Whittleyville, TN 38588 should you decide you need to inspect the vehicle.

I can be reached at 770-391-8670 if you have any questions.

Sincerely,

Pamela Speer
Sr. Subrogation Analyst
Cotton States Insurance Company

EB05-005-LC-2200

PRIVILEGED & CONFIDENTIAL

Office of the General Counsel

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

March 17, 2005

Pamela Speer
Cotton States Insurance
P.O. Box 105303
Atlanta, GA 30348

RE: Your Insured: [redacted]
Claim No:
DOL: 08/03/04

Dear Ms. Speer:

We acknowledge your recently submitted subrogation claim. 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.)

- [x] 1. Attach on a separate piece of paper 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.
- [x] 3. Original color photographs of the vehicle's collision/fire damage & the alleged defective part(s), **from several different angles.**
- [x] 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 scene showing the grade of the road.
- [x] 6. Attach a copy of your expert's report and the expert's original 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**.
- [x] 8. A 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:
   Miami FL

10. The 17 digit vehicle identification number:
    2FTRF18L61 [redacted]

11. What was the mileage at time of occurrence:
    49 750

12. What is the alleged defect:
underhood speed control deactivation sw. the

13. Has the alleged defective part been repaired or replaced? (circle one) Yes or No

14. List all after market additions or modifications that were made to the vehicle:

15. Was the engine running? (circle one) Yes or No

16. Were the keys in the ignition? (circle one) Yes or No

17. Was this vehicle purchased new or used:
used

If purchased used, provide the date of purchase, mileage at the time of purchase, and from whom the vehicle was purchased: 11-1-2001 - mileage 11,735

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

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

Sincerely,

Julie Szymanski

Julie Szymanski
Claims Analyst

ER85-805-LC-2283

E005-005-LC-2284

2R05-005-LC-2205

ER85-095-LC-2286

EN95-005-LC-2287

EA05-005-LC-2288

Claim Number: [redacted]
Insured:

This is Ken Mathes speaking. I'm calling from Cotton States Insurance. My telephone number is 1-800-457-1658. My extension is 8642. It's August 4th, 2004, at approximately 2:54 p.m. I am speaking with Wayne Malloy concerning an incident involving a 2004 F-150, excuse me, a 2001 F-150.

Q. [redacted], if you'll please state your name and your address for me, please?

A. It's [redacted] the second. My address is [redacted] Marianna, Florida.

Q. And your current phone number, please?

A. [redacted]

Q. [redacted], are you aware that I am recording this conversation?

A. Yes, I am.

Q. Do I have your permission to take this statement?

A. Yes, you do.

Q. O.K [redacted] what's your, who's your current employer?

A. Uh [redacted]

Q. And how long have you been employed there?

A. Uh, well, this is the second time I've been there, but pretty much all, about 20 years.

Q. O.K.

A. There was 3 years I worked with a different company, but.

Q. So this is a family business, then?

A. Right, yeah.

Q. And what color was the vehicle?

A. Green.

Q. And what's the mileage on this vehicle, [redacted]

A. Uh, right, I think it just hit 80,000 miles. 79 or 80 thousand.

Q. Is this vehicle used for business or pleasure?

A. Mostly pleasure, but I do, I have some cows and stuff, you know, I go to the farm and, you know, take care of the cows and stuff like that on it.

Q. O.K. Has the vehicle ever been involved in an accident before?

A. Um, yeah, I had a, uh, about a, I think it was about a year ago, I have a little utility trailer.

Q. Uh hum.

A. That I like carry my lawn mower and stuff on.

Q. O.K.

A. I had backed, I was backing out, and I jackknifed the trailer, and I put a, I don't know, but it like cut the side panel of the truck, the trailer did, and that's the only accident this.

Q. Have you had that damage repaired?

A. Yes, I did.

Q. Who repaired that damage?

A. Cotton States. Or, what company?

Q. Yeah, what, what body shop?

A. Uh, let's see, Hollis Body Shop.

Q. I'm sorry?

A. Hollis H-O-L-L-I-S.

Q. O.K. And the vehicle, uh, caught fire at your residence?

A. Yes, it did.

Q. When did you last park the vehicle?

A. Uh, it was between 5:30 and a quarter till 6.

Q. In the afternoon?

A. Yes.

Q. Did you notice anything unusual prior to parking the vehicle?

A. No, nothing at all.

Q. Have you had any recent maintenance work done on the vehicle, oil changes or anything?

A. No, not, not in the last couple of months.

Q. When's the last time you had the vehicle serviced?

A. Um, I believe it was the end of April or the first of May, it was done at Firestone in Marianna.

Q. And what did you have done at that time?

A. I just had an oil change, and I think I got my transmission serviced, just got them to change transmission fluid in the vehicle.

Q. O.K. Is the vehicle still currently being financed?

A. No, it's paid for.

Q. When was SunTrust Bank paid off?

A. Uh, I think it was November or December of 2002.

Q. And who is the titled owner to the vehicle?

A. I am.

Q. Is it [redacted] the second?

A. Yes.

Q. Are you the only listed person on the title?

A. Yes, I am.

Q. Do you have a copy of that title?

A. Uh, yes, I do.

Q. O.K. And did the fire department come out and put out the fire?

A. Yes, they did.

Q. What fire department?

A. The Marianna Fire Department, and when they came out and put it out, all that he could tell me was, well, there was definitely, the fire definitely started under the hood. As a matter of fact, about, I don't know, it was about a quarter, I had been outside about 7 or 7:30.

Q. Uh hum.

A. My girlfriend had come over, I'd say it was probably about 7:15.

Q. Uh hum.

A. And I was outside whenever, well, I walked outside whenever she came to the house.

Q. Right.

A. And there was no smoke or nothing, no, you, there was nothing wrong with the truck, and then I came in and gave my kids a bath, and about, I'd say it was about a quarter till 8, I told her I was going to run to the store.

Q. Uh hum.

A. And I'd be right back, and when I walked out the door, there was some flames coming out on the driver's side, you know, under the engine compartment.

Q. Uh hum.

A. So I told her to call the fire department. I came in and got a fire extinguisher and took the fire extinguisher out there and sprayed the flames.

Q. Uh hum.

A. And the flames went down for about maybe 3 to 5 seconds, it made the flames like go down on my tire in the front.

Q. O.K.

A. And it was like the tire was on fire.

Q. O.K.

A. But like within about 5 seconds, they were like 3 times as big as they were before I tried to put it out.

Q. So your girlfriend called the fire department?

A. Yes, she did. And, uh, I mean, it didn't probably take them 4 or 5 minutes to get here, but by the time they got here.

Q. How bad is the vehicle burned?

A. It's burned bad, I mean, it's like the hood is just like totally disintegrated.

Q. O.K. Did it get into the inside of the vehicle?

A. Uh, right across the top where the, the headlight runs, like some flames went across the top a little bit. There's hardly no damage in the inside of the vehicle, except like I think whenever they were trying to put the fire out, it busted the windshield, you know, so there's a little water damage in there.

Q. O.K.

A. But, I mean, it's like even the motor, parts of the motor, the casing of the motor, are like gone. You can see like the crank shaft and stuff like that inside the truck, inside the, you know, inside the motor.

Q. Right. Have you ever filed bankruptcy before?

A. No, I haven't.

Q. What I'm going to do, Wayne, have you understood all the questions that I've asked?

A. Yes.

Q. Have they been true and correct to the best of your knowledge?

A. Yes.

Q. If I can just get your permission to stop the recorder?

A. O.K.

KM/jm

JACKSON COUNTY FIRE RESCUE

№ 000264

FIRE INVESTIGATION

RUN # 363 STATION # I SHIFT: C DATE: 8-3-04 DAY: Tues YEAR: 2004 TIME OF ALARM: 2007

Time Enroute: 2009 Time Arrived at Scene: 2014 Time Returned to Station: 2105

Location of Fire: [redacted]

Business: [ ] Dwelling: [ ] Auto: [X] Accident: [ ] Type of Structure: pick up truck 4x4

Area of Origin: under hood Cause of Fire (if known) Unk

Name of Owner: [redacted] Address: [redacted] Marianna, FL PX # 526-3917

Name of Tenant: Address:

Name of Insurer: Geico State Local Agent: Policy # FPA 3504 9044

Address: Telephone:

Amount of Structure Damage: Contents:

Vehicle Make: Ford Model: F-150 Year: 1990 Tag #: 451 YKT VIN #: 2FTDX1516[redacted]

Vehicle Make: Model: Year: Tag #: VIN #:

If injuries or Death List Name: None Address:

Extent of Injuries: None

Firefighter in Charge of Fire: Lt. Williams

Firefighters at Fire: Lt. Williams, CAPT. Barnett, Bennett, Davis, MFO Williams, Collins

Firefighters at Station:

Equipment Used: # 373, # 352, # MFO # M3

Diagram Layout of Fire:

Mallory, Wayne W DOB 8-2-1965 SS # 266-98-0499

Summary of Fire: Responded to vehicle fire at above address. Upon arrival MFO on scene & extinguished fire with 1-75 attack line. Owner stated parked truck for two hours walked back outside & found fire coming from under hood area. Truck drive safe. Fire DCFR fire marshal called out. Fire is still under investigation by DCFR & State Fire marshal's office. All units in...

Reported By: [signature] Approved By:

EA05-085-LC-2215

08/05/2004 16:41 9505265912 DEAN INSURANCE PAGE 04

[redacted] | FL | 08 | 03 | 2004 | 1 | 04-0000252 | 000 | Delete / Change / No Activity | NFIRS -1 Basic

State ★ | Incident Date ★ (MM DD YYYY) | Station | Incident Number ★ | Exposure ★

Location★

☐ Check this box to indicate that the address for this incident is recorded on the Wildland Fire Module in Section 6 "Alternative Location Specification". Use only for Wildland Fires.

Census Tract [ ] - [ ]

☒ Street Address
☐ Intersection
☐ In front of
☐ Near of
☐ Adjacent to
☐ Directions

[redacted] Number/Milepost | Prefix | [redacted] Street or Highway | Street Type | Suffix

Apt./Suite/Room | Marianna City | FL State | [redacted] Zip Code

Cross street or directional, as applicable.

C Incident Type ★

131 | Passenger vehicle fire

Incident Type

D Aid Given or Received★

1 ☐ Mutual aid received
2 ☐ Automatic aid recv.
3 ☐ Mutual aid given
☐ Automatic aid given
☐ Other aid given
N ☒ None

Their FD's ID | Their Name | Their Incident Number

E1 Date & Times Midnight is 0000

Check boxes if times are the same as Alarm Time.

	Month	Day	Year	Hr Min Sec
Alarm ★ (ALARM always required)	08	03	2004	20:07:00
☒ Arrival ★ (ARRIVAL required, unless extinguished or did not arrive)	08	03	2004	20:14:00
☒ Controlled (CONTROLLED optional, except for wildland fires)	08	03	2004	20:14:00
☒ Last Unit Cleared (LAST UNIT CLEARED, required except for wildland fires)	08	03	2004	21:05:00

E2 Shift & Alarms

Local Option

C | 01 | 399

Shift or Platoon | Alarms | District

E3 Special Studies

Local Option

Special Study Fld | Special Study Value

F Actions Taken ★

11 | Extinguish

Primary Action Taken (1)

Additional Action Taken (2)

Additional Action Taken (3)

G1 Resources ★

☒ Check this box and skip this section if no apparatus or Personnel time is used.

	Apparatus	Personnel
Suppression	0003	0004
EMS		
Other		

☐ Check box if resource counts include aid received resources.

G2 Estimated Dollar Losses & Values

LOSSES: Required for all fires if known. Optional for non fires.

		None
Property $	000,000	☐
Contents $	000,000	☐

PRE-INCIDENT VALUE: Optional

Property $	000,000	☐
Contents $	000,000	☐

Completed Modules

☒ Fire-2
☐ Structure-3
☐ Civil Fire Cas.-4
☐ Fire Serv. Cas.-5
☐ EMS-6
☐ Hazmat-7
☐ Wildland Fire-8
☒ Apparatus-9
☒ Personnel-10
☐ Arson-11

H1 Casualties ☒ None

	Deaths	Injuries
Fire Service		
Civilian		

H2 Detector

Required for Confined Fires.

1 ☐ Detector alerted occupants
2 ☐ Detector did not alert them
N ☐ Unknown

H3 Hazardous Materials Release

N ☐ None
1 ☐ Natural Gas:
2 ☐ Propane gas:
3 ☒ Gasoline:
4 ☐ Kerosene:
5 ☐ Diesel fuel/fuel oil:
6 ☐ Household solvents:
7 ☐ Motor oil:
8 ☐ Paint:
0 ☐ Other:

I Mixed Use Property

NNN	☐ Not mixed
10	☐ Assembly use
20	☐ Education use
30	☐ Medical use
40	☐ Residential use
51	☐ Row of stores
53	☐ Enclosed mall
58	☐ Bus. & Residential
59	☐ Office use
60	☐ Industrial use
63	☐ Military use
65	☐ Farm use
00	☐ Other mixed use

J Property Use★ Structures

131 ☐ Church, place of worship
161 ☐ Restaurant or cafeteria
162 ☐ Bar/Tavern or nightclub
213 ☐ Elementary school or kindergarten
215 ☐ High school or junior high
241 ☐ College, adult education
311 ☐ Care facility for the aged
331 ☐ Hospital
341 ☐ Clinic, clinic type infirmary
342 ☐ Doctor/dentist office
361 ☐ Prison or jail, not juvenile
419 ☐ 1-or 2-family dwelling
429 ☐ Multi-family dwelling
439 ☐ Rooming/boarding house
449 ☐ Commercial hotel or motel
459 ☐ Residential, board and care
464 ☐ Dormitory/barracks
519 ☐ Food and beverage sales
539 ☐ Household goods, sales, repairs
579 ☐ Motor vehicle/boat sales/repair
571 ☐ Gas or service station
599 ☐ Business office
615 ☐ Electric generating plant
629 ☐ Laboratory/science lab
700 ☐ Manufacturing plant
819 ☐ Livestock/poultry storage (barn)
882 ☐ Non-residential parking garage
891 ☐ Warehouse

Outside

124 ☐ Playground or park
655 ☐ Crops or orchard
669 ☐ Forest (timberland)
867 ☐ Outdoor storage area
919 ☐ Dump or sanitary landfill
931 ☐ Open land or field
936 ☐ Vacant lot
938 ☐ Graded/cleared for plot of land
946 ☐ Lake, river, stream
951 ☐ Railroad right of way
960 ☐ Other street
961 ☐ Highway/divided highway
962 ☐ Residential street/driveway
981 ☐ Construction site
984 ☐ Industrial plant yard

Lookup and enter a Property Use Code only if you have not checked a Property Use box.

Property Use | 965 | Vehicle parking area

NFIRS-1 Revision 03/11/99

ER05-005-LC-2216

son/Entity Involved

Nickname (if applicable) | Area Code | Phone Number

Mr., Ms., Mrs. | First Name | MI | Last Name | Suffix

Number | Prefix | Street or Highway | Street Type | Suffix

Post Office Box | Apt./Suite/Room | City

State | Zip Code

☐ Were people involved? Check this box and attach Supplemental Forms (DFIRS-1X) as necessary

K2 Owner ☐ Same as person involved? Then check this box and skip the rest of this section.

Nickname (if Applicable) | Area Code | Phone Number

☒ Check this box if same address as primary location. Then skip the three duplicate address boxes.

Mr., Ms., Mrs. | First Name | MI | Last Name | Suffix

Number | Prefix | Street or Highway | DR Street Type | Suffix

Post Office Box | Apt./Suite/Room | Marianna City

FL State | Zip Code

L Remarks

RESPONDED TO VEHICLE FIRE AT ABOVE ADDRESS. UPON ARRIVAL MFD ON SCENE & EXTINGUISHING FIRE WITH 1.75 ATTACK LINE. OWNER STATED PARKED TRUCK FOR TWO HOURS WALKED BACK OUTSIDE & FOUND FIRE COMING FROM UNDER HOOD AREA AROUND FRONT DRIVER SIDE TIRE. JCFR FIRE MARSHALL CALLED OUT. FIRE IS STILL UNDER INVESTIGATION BY JCFR & STATE FIRE MARSHALL'S OFFICE. ALL UNITS BACK IN SERVICE.

L Authorization

Officer in Charge ID	Signature	Position or rank	Assignment	Month	Day	Year
000309	WILLIAMS, JOSH	5		08	03	2004

☒ Check box if same as officer making report in charge.

Officer making report ID	Signature	Position or rank	Assignment	Month	Day	Year
000309	WILLIAMS, JOSH	5		08	03	2004

			MM	DD	YYYY				
[redacted]42	FL		8	3	2004	1	04-0000252	000	Complete Narrative
*	State *		Incident Date *			Station	Incident Number *	Exposure *	

Narrative:

RESPONDED TO VEHICLE FIRE AT ABOVE ADDRESS. UPON ARRIVAL MFD ON SCENE & EXTINGUISHING FIRE WITH 1.75 ATTACK LINE. OWNER STATED PARKED TRUCK FOR TWO HOURS WALKED BACK OUTSIDE & FOUND SMOKE COMING FROM UNDER HOOD AREA AROUND FRONT DRIVER SIDE TIRE. JCFR FIRE MARSHALL CALLED OUT. FIRE IS STILL UNDER INVESTIGATION BY JCFR & STATE FIRE MARSHALL'S OFFICE. ALL UNITS BACK IN SERVICE.

[redacted]042 | FL | MM 08 | DD 03 | YYYY 2004 | 1 | 04-0000282 | 000 | Delete / Change / No Activity | NFIRS -2 Fire

FD ★ | State ★ | Incident Date ★ | Station | Incident Number ★ | Exposure ★

Property Details

B1 [ ] ☒ Not Residential
Estimated number of residential living units in building of origin whether or not all units became involved

B2 [ ] ☒ Buildings not involved
Number of buildings involved

B3 [ ] ☒ None ☐ Less than one Acre
Acres burned (outside fires)

C On-Site Materials or Products ☐ None

Complete if there was any significant amount of commercial, industrial, energy or agricultural products or materials on the property, whether or not they became involved

Enter up to three codes. Check one or more boxes for each code entered.

On-site material (1)
1 ☐ Bulk storage or warehousing
2 ☐ Processing or manufacturing
3 ☐ Packaged goods for sale
4 ☐ Repair or service

On-site material (2)
1 ☐ Bulk storage or warehousing
2 ☐ Processing or manufacturing
3 ☐ Packaged goods for sale
4 ☐ Repair or service

On-site material (3)
1 ☐ Bulk storage or warehousing
2 ☐ Processing or manufacturing
3 ☐ Packaged goods for sale
4 ☐ Repair or service

Ignition

D1 03 | Engine area, running
Area of fire origin ★

D2 00 | Undetermined
Heat source ★

D3 00 | Undetermined
Item first ignited ★ 1 ☐ Check box if fire spread was confined to object of origin

D4 [ ]
Type of material first ignited — Required only if item first ignited code is 00 or 098

E1 Cause of Ignition

☐ Check box if this is an exposure report. Skip to section G

1 ☐ Intentional
2 ☐ Unintentional
3 ☐ Failure of equipment or heat source
4 ☐ Act of nature
5 ☒ Cause under investigation
6 ☐ Cause undetermined after investigation

E2 Factors Contributing To Ignition

☐ None

Factor Contributing to Ignition (1)

Factor Contributing to Ignition (2)

E3 Human Factors Contributing To Ignition

Check all applicable boxes

1 ☐ Asleep ☐ None
2 ☐ Possibly impaired by alcohol or drugs
3 ☐ Unattended person
4 ☐ Possibly mental disabled
5 ☐ Physically disabled
6 ☐ Multiple persons involved
7 ☐ Age was a factor

Estimated age of person involved [ ]

1 ☐ Male 2 ☐ Female

F1 Equipment Involved In Ignition

☐ None If Equipment was not involved, skip to Section G

Equipment Involved

Mfg

Model

Serial #

Year

F2 Equipment Power

Equipment Power Source

F3 Equipment Portability

1 ☐ Portable
2 ☐ Stationary

Portable equipment normally can be moved by one person, is designed to be used in multiple locations, and requires no tools to install.

G Fire Suppression Factors

Enter up to three codes. ☐ None

Fire suppression factor (1)

Fire suppression factor (2)

Fire suppression factor (3)

H1 Mobile Property Involved

☐ None

1 ☐ Not involved in ignition, but burned
2 ☐ Involved in ignition, but did not burn
3 ☒ Involved in ignition and burned

H2 Mobile Property Type & Make

11 | Passenger car.
Mobile property type

FO | Ford
Mobile property make

F-150
Mobile property model

2000
Year

[redacted] | FL | 2FTRX18L[redacted]
License Plate Number | State | VIN Number

Local Use

☐ Pre-Fire Plan Available

Some of the information presented in this report may be based upon reports from other agencies

☐ Arson report attached
☐ Police report attached
☐ Coroner report attached
☐ Other reports attached

NFIRS-2 Revision 01/18/89

[illegible]042	FL	MM 8	DD 3	YYYY 2004	1	04-0000252	000	☐ Delete ☐ Change	NFIRS - 1 Apparatus or Resources
[illegible] *	State *	Incident Date *			Station	Incident Number *	Sequence *		

Apparatus or Resource *	Date and Time (Check if same as alarm date)	Sent [X]	Number of People *	Use (Check one box for each apparatus to indicate its main use at the incident.)	Actions Taken
1 ID 352 Type 76	Dispatch [X] 8 3 2004 20:07 Arrival [X] 8 3 2004 20:14 Clear [X] 8 3 2004 21:05	[X]	2	[X] Suppression [X] EMS ☐ Other	
2 ID 373 Type 16	Dispatch [X] 8 3 2004 20:07 Arrival [X] 8 3 2004 20:14 Clear [X] 8 3 2004 21:05	[X]	1	[X] Suppression ☐ EMS [X] Other	
3 ID C2 Type 32	Dispatch [X] 8 3 2004 20:07 Arrival [X] 8 3 2004 20:14 Clear [X] 8 3 2004 21:05	[X]	1	[X] Suppression ☐ EMS ☐ Other	
4 ID Type	Dispatch ☐ Arrival ☐ Clear ☐	☐		☐ Suppression ☐ EMS ☐ Other	
5 ID Type	Dispatch ☐ Arrival ☐ Clear ☐	☐		☐ Suppression ☐ EMS ☐ Other	
6 ID Type	Dispatch ☐ Arrival ☐ Clear ☐	☐		☐ Suppression ☐ EMS ☐ Other	
7 ID Type	Dispatch ☐ Arrival ☐ Clear ☐	☐		☐ Suppression ☐ EMS ☐ Other	
8 ID Type	Dispatch ☐ Arrival ☐ Clear ☐	☐		☐ Suppression ☐ EMS ☐ Other	
9 ID Type	Dispatch ☐ Arrival ☐ Clear ☐	☐		☐ Suppression ☐ EMS ☐ Other	

Type of Apparatus or Resources

Ground Fire Suppression
- 11 Engine
- 12 Truck or aerial
- 13 Quint
- 14 Tanker & pumper combination
- 16 Brush truck
- 17 ARF (Aircraft Rescue and Firefighting)
- 10 Ground fire suppression, other

Heavy Ground Equipment
- 21 Dozer or plow
- 22 Tractor
- 24 Tanker or hauler
- 20 Heavy equipment, other

Aircraft
- Aircraft: fixed wing tanker
- 42 Helitanker
- 43 Helicopter
- 40 Aircraft, other

Marine Equipment
- 51 Fire boat with pump
- 57 Boat, no pump
- 50 Marine apparatus, other

Support Equipment
- 61 Breathing apparatus support
- 62 Light and air unit
- 60 Support apparatus, other

Medical & Rescue
- 71 Rescue unit
- 72 Urban Search & rescue unit
- 73 High angle rescue unit
- 75 BLS unit
- 74 ALS unit
- 70 Medical and rescue unit, other

More Apparatus? Use Additional Sheets

Other
- 91 Mobile command post
- 92 Chief officer car
- 93 Exhibit unit
- 94 Type 1 hand crew
- 95 Type 2 hand crew
- 96 Privately owned vehicle
- 00 Other apparatus/resource

- NN None
- UU Undetermined

NFIRS-9 Revision 11/17/98

RID *	State *	MM	DD	YYYY	Station	Incident Number *	Exposure *		
25042	FL	8	3	2004	1	04-0000253	000	☐ Delete ☐ Change	NFIRS - 10 Personnel

Apparatus or Resource * (Use roman letters below)	Date and Time (Check if same as alarm date)				Sent	Number of People *	Use (Check one box for each apparatus to indicate its main use on the incident)	Actions Taken (List up to 4 actions for each apparatus and each personnel)
		Month	Day	Year	Hours/mins			
1 ID 352 Type 76	Dispatch ☒	8	3	2004	20:07	2	☒ Suppression ☒ EMS ☐ Other	
	Arrival ☒	8	3	2004	20:14			
	Clear ☒	8	3	2004	21:05			

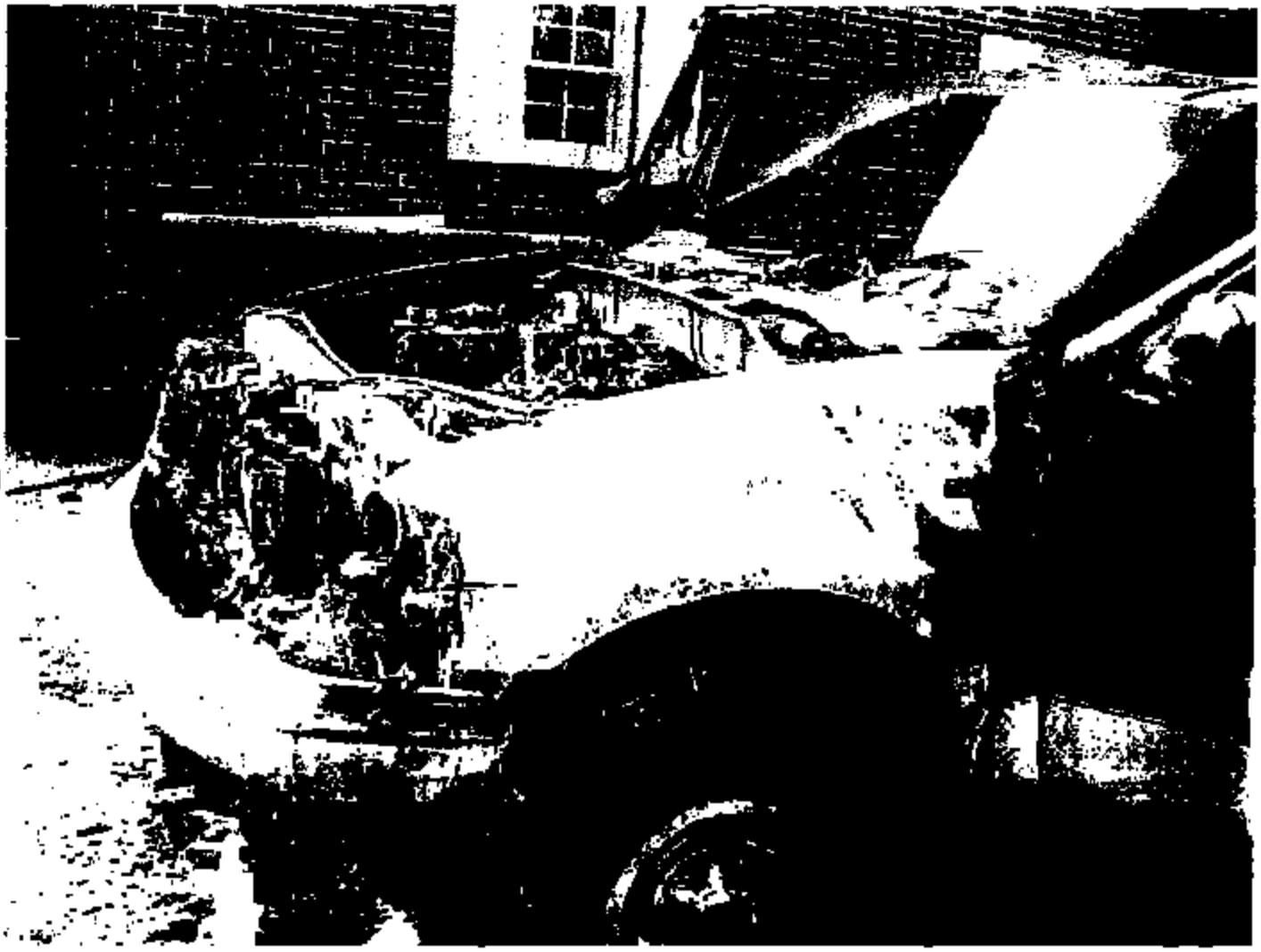
Personnel ID	Name	Rank or Grade	Attend	Action Taken	Action Taken	Action Taken	Action Taken
00327	BERNIER, ANGELO	6	X				
00332	Deese, Kenny	7	X				

Apparatus or Resource * (Use roman letters below)	Date and Time (Check if same as alarm date)				Sent	Number of People *	Use (Check one box for each apparatus to indicate its main use on the incident)	Actions Taken (List up to 4 actions for each apparatus and each personnel)
		Month	Day	Year	Hours/mins			
2 ID 373 Type 16	Dispatch ☒	8	3	2004	20:07	1	☒ Suppression ☐ EMS ☒ Other	
	Arrival ☒	8	3	2004	20:14			
	Clear ☒	8	3	2004	21:05			

Personnel ID	Name	Rank or Grade	Attend	Action Taken	Action Taken	Action Taken	Action Taken
10309	WILLIAMS, JOSH	5	X				

Apparatus or Resource * (Use roman letters below)	Date and Time (Check if same as alarm date)				Sent	Number of People *	Use (Check one box for each apparatus to indicate its main use on the incident)	Actions Taken (List up to 4 actions for each apparatus and each personnel)
		Month	Day	Year	Hours/mins			
3 ID C2 Type 92	Dispatch ☒	8	3	2004	20:07	1	☒ Suppression ☐ EMS ☐ Other	
	Arrival ☒	8	3	2004	20:14			
	Clear ☒	8	3	2004	21:05			

Personnel ID	Name	Rank or Grade	Attend	Action Taken	Action Taken	Action Taken	Action Taken
10303	Bennett, Byron	8	X				



EA05-085-LC-2222

ER85-665-LC-2223

ER05-085-LC-2224

ER85-085-LC-2225

[redacted]

FARMERS

National Document Center
P.O. Box 268992
Oklahoma City, OK 73126-8992
claimsdocument@farmersinsurance.com
Fax : 877-217-1389

03/16/2005

Shawn Norton
Ford Motor Company
Parklane Towers West, Ste 300
Three Parklane Blvd
Dearborn, MI 48126-2568

Re: Our Insured: [redacted]
Loss Date: 01/22/2005
Claim Number: 099 SUB[redacted]
Total Amount Owed: $18,704.63

Dear Ms. Norton:

We previously advised you of our subrogation rights in regards to the above-noted claim. Enclosed herewith is our Cause & Origin Report with color photographs.

Mid-Century Insurance Company of Texas has a right to recover for damages paid on behalf of our insured. Please be advised that if any claims are paid under our Uninsured Motorist Provision or Personal Injury Protection Benefits, those amounts will be added to our claim.

Please be aware that no partial payment to Mid-Century Insurance Company of Texas that is less than the full amount claimed herein will be considered in any way an acceptance of benefits, a notation or accord and satisfaction of this claim without an express written release of our claim executed by an individual who is a member of our subrogation department. Therefore, our legal rights to enforce collection on the remaining amount of claim shall not be waived or estopped due to a partial payment by you or someone action on your behalf.

Sincerely,
Mid-Century Insurance Company of Texas

Scott Sheff

Scott Sheffield
Special Subrogation Representative
512-238-5739

ANALYZING FIRE LOSSES

PRIVATE & CONFIDENTIAL REPORT

CLAIM NUMBER [redacted]

ANALYZING FIRES LOSSES

H. W. "Hank" Bardenhagen
Houston (713) 973-3714
Conroe (936) 295-0532

February 3, 2006

Requestor: **FARMERS INSURANCE GROUP**
Aaron Young
1012 Denman
Lufkin, Texas 75901
936-637-9992

Claim Number: [redacted]
Date of Loss **January 22, 2003**
AFL Number: **051091**
Assured: [redacted]

Dear Sir

The below listed evidence was collected during your requested examination of the above referenced loss. This evidence will be stored at our facility and annual fee listed within the attached invoice will be charged.

Should you or your company decide this evidence discarded, examined and/or other action, please contact our office at your convenience.

Evidence description **MASTER CYLINDER AND PRESSURE SWITCH**

Evidence disposition or transfer **LEFT IN PLACE ON VEHICLE**

Respectfully submitted,

H W "Hank" Bardenhagen

HWB/mw

P.O. Box 1672 Conroe, Texas 77305

ANALYZING FIRE LOSSES

H. W. "Hank" Bardenhagen
Houston (713) 974-3714
Conroe (936) 295-8522

February 3, 2005

Aaron Young
FARMERS INSURANCE GROUP
1012 Denman
Lufkin, Texas 75901
936-637-0992

Claim Number: [redacted]
Case Number 051091
Assured: [redacted]
Lufkin, Texas [redacted]

Dear Gentlemen

Per your request a fire scene examination was conducted on February 3, 2005, as to the cause and origin of the fire Loss that occurred involving the above referenced assured.

Enclosed you will find a detailed written report to include fire cause and origin, photographs transmittal letters and other attachments

We appreciate the opportunity to be of service to you and should you need additional information, please contact us at your earliest convenience

Respectfully submitted

H. W. "Hank" Bardenhagen

HWB/mw

Attachments

AFL is governed by the Acts and Rules of the Texas Commission On Private Security, P.O. Box 13509, Austin, Texas 78711, telephone number 512-463-5545

H. B. Hank Hardenbergen
Houston (713) 973-3754
Conroe (936) 295-8572

Date of Report:	*February 3, 2005*
Case Number:	*051091*
Date of Loss:	*January 22, 2005*
Time of Loss:	*9:38 AM*
Requested by:	*FARMERS INSURANCE GROUP*
Prepared for:	*Aaron Young*
Assured:	[redacted]
	Lufkin, Texas
Claim Number:	[redacted]

REPORT SUMMARY

This report summary is for the convenience of the requestor. The summary is not attached and is considered part of the original examination report but may be used as required by the requestor.

The above listed loss was caused by flames ignited within **the engine compartment, driver side, at the master cylinder brake pressure switch**.

Based on the observations of the fire scene on the date of this examination, this investigator concludes the cause of the above captioned loss should be regarded as **accidental.**

This investigator found no evidence that tended or proved any intent to damage and/or destroy the structure at the above listed location. The conclusion should be reconsidered should evidence be found that tends or proves intent to damage and/or destroy the above listed structure.

The findings and opinions within this report are reflective of the fire scene examination, evidence examined and information obtained during the examination/investigation. The fire patterns and smoke spread corroborate and/or support the above listed findings and opinions. The photographs and diagrams are included for supportive documentation.

Please feel free to contact my office at your convenience should you require additional information or assistance.

P.O. Box 1672 Conroe, Texas 77305

Date of Report:	*February 3, 2005*
Case Number:	*051093*
Date of Loss:	*January 22, 2005*
Time of Loss:	*9:38 AM*
Requested by:	*FARMERS INSURANCE GROUP*
Prepared for:	*Aaron Young*
Assured:	[redacted]
	Lufkin, Texas [redacted]
Claim Number:	[redacted]

VEHICLE DESCRIPTION

The vehicle examined was a five (5) door 2002 Ford Expedition, silver in color. The vehicle was examined at the above listed insured's residence and loss location, Lufkin, Texas. The vehicle was positioned within the driveway and approximately four (4) to five (5) feet from the edge of the dwelling, at the garage conversion.

VEHICLE EXAMINATION

The overall exterior view of the vehicle revealed a fire had occurred within the engine compartment driver side. The fire progressed upward and outward, damaging the engine compartment hood and windshield area. The driver front tire was observed burned and deflated. Burn damage was observed most severe along the rear portion and interior area of the engine compartment.

This investigator examined the interior of the vehicle. No suspect burn damage was observed throughout the interior portions. Smoke and sooting was observed along the upper portions progressing throughout the area. This was observed as the windshield had been fractured along the driver portion and smoke and sooting progressed inward, into the interior area.

An examination of the front engine compartment area revealed the most severe burn damage.

observed. The most severe burn damage observed was along the driver portion firewall area. This was at the brake boost pump and master cylinder area. This investigator observed burn damage progressing outward, from the forward portion of the master cylinder.

As can be observed within the enclosed photographs, the brake pressure switch was observed severely burn damage with the wires unobserved. The compression area for the dividing portion was observed damaged and fallen downward, along the connection portion of the base of the switch and master cylinder. This investigator observed severe damage to the master cylinder and pressure switch area. This led this investigator to form an opinion, there was a failure of the switch.

The switch and master cylinder were tagged into evidence and wrapped into protective plastic and remained on the vehicle for further analysis by interested parties.

EXAMINERS OPINION

The above listed loss was caused by flames ignited within the engine compartment, driver side, at the master cylinder brake pressure switch.

EXAMINERS CONCLUSION

Based on the observations of the fire scene on the date of this examination, this investigator concludes the cause of the above captioned loss should be regarded as accidental.

This investigator found no evidence that tended or proved any intent to damage and or destroy the

vehicle at the above listed location The conclusion should be reconsidered should evidence be found that tends or proves intent to damage and/or destroy the above listed vehicle

The findings and opinions within this report are reflective of the fire scene examination, evidence examined and information obtained during the examination/investigation The fire patterns and smoke spread corroborate and/or support the above listed findings and opinions The photographs and diagrams are included for supportive documentation

Submitted

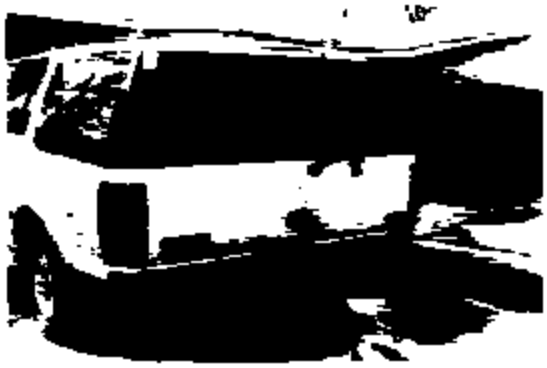
AFI.

H W "Hank" Bardenhagen

HWB/mw

H. W. "Hank" [illegible]

Houston [illegible]
Corpus [illegible]



Case Number:
Injured Co
Reported By:
Claim Number:
[illegible]
[illegible]
[illegible]
[illegible]
[illegible]
[illegible]
[illegible]
[illegible]

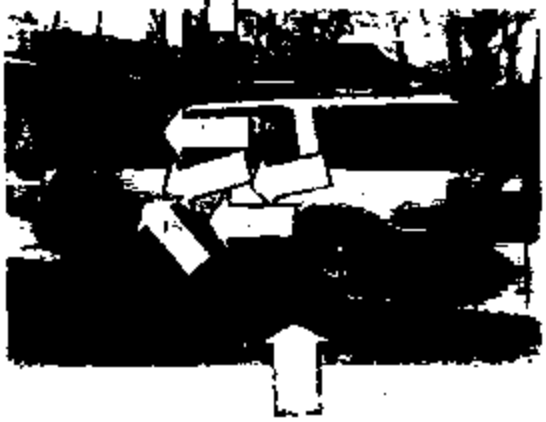
[illegible]

H. W. "Hank" [illegible]

ANALYZING FIRE LOSSES

H. W. "Hoot" Gardenhire

Houston (713) [illegible]-3714
Conroe (936) 295-0522



Case Number:
Requested By:
Requested By:
Claim Number:
Insured:
[illegible]

[illegible]

[illegible]

Photo #1

Front exterior view, showing burn damage progressing rearward compartment, master cylinder area.

Photo #2

Front driver side view, showing burn damage progressing engine compartment, driver side.

Photo #3

Driver side view, showing burn damage progressing engine compartment.

Photo #4

Driver side view, showing burn damage progressing from engine compartment, with a less amount of burn damage along rear portions.

Photo #5

Rear driver side view, showing burn damage progressing engine compartment area.

Photo #6

Rear exterior view, showing no suspect burn damage, with Texas tag on rear of vehicle.

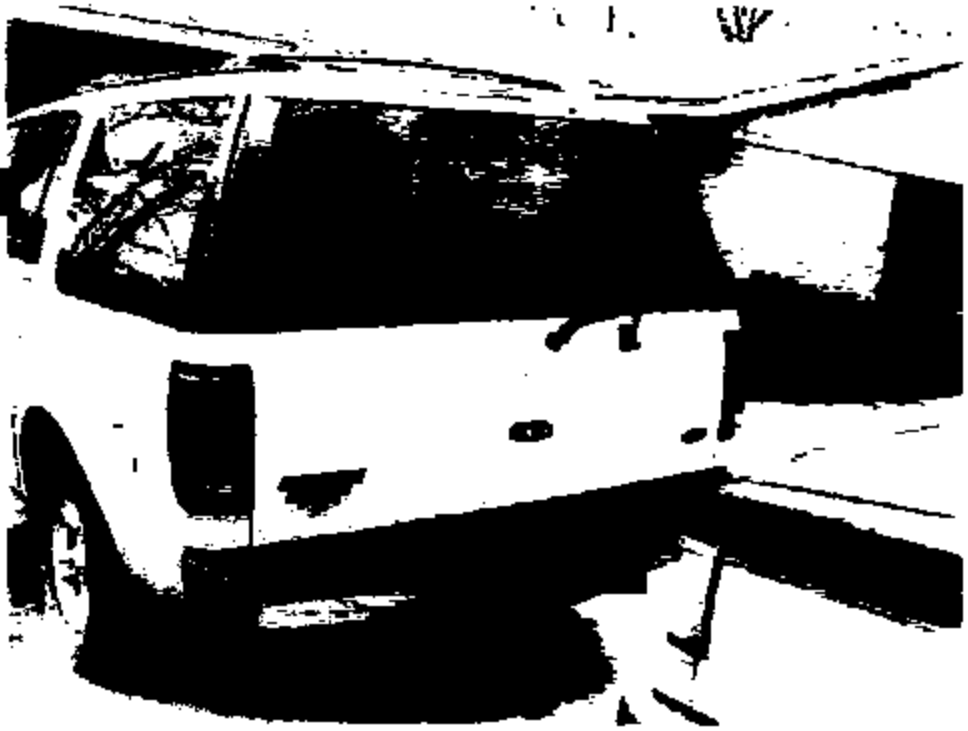


Photo #7

Rear passenger side view, showing burn damage progressing forward engine compartment area.

Photo #8

Passenger side view, showing burn damage progressing engine compartment area.

Photo #9

Front passenger side view, showing burn damage progressing front engine compartment, driver side.

Photo #10

Rear driver seat, showing no suspect burn damage.

Photo #11

Cargo area, showing no suspect burn damage.

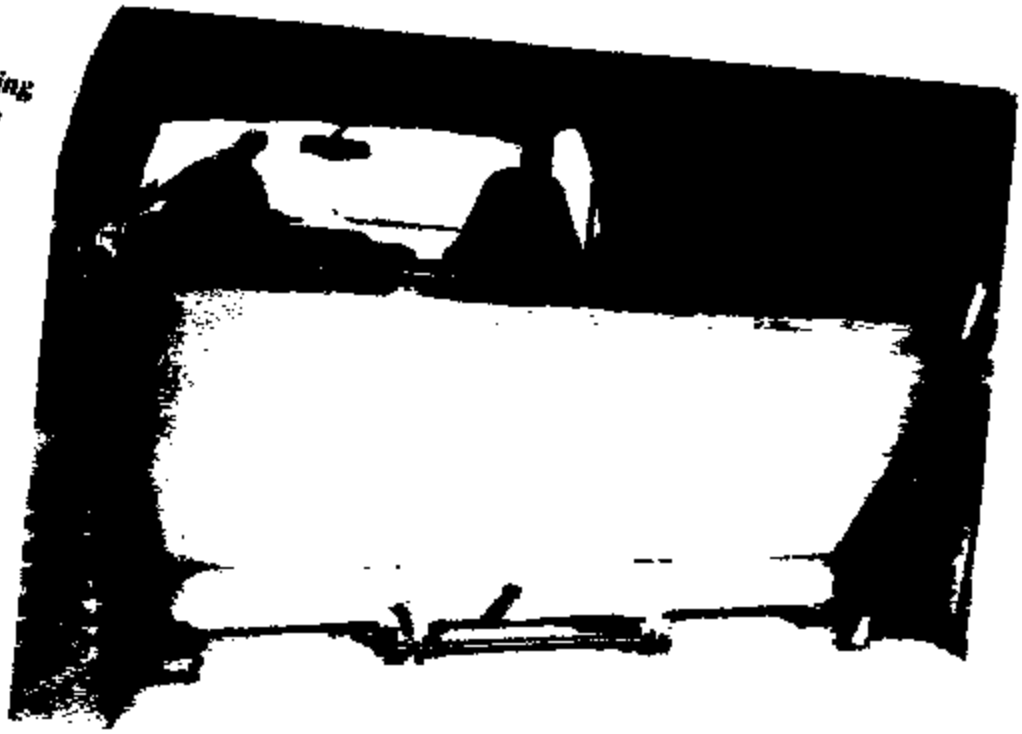


Photo #12

Rear passenger seat, showing no suspect burn damage.

Photo #13

Front passenger seat, showing no suspect burn damage.

Photo #14

Dash, passenger side, showing burn damage progressing upward, along windshield, into vehicle.

Photo #15

Driver front seat/dash area, showing no suspect burn damage progressing from within dash.

Photo #16

Driver front seat area, showing no suspect burn damage.

Photo #17

Manufacturer's placard, showing manufacturing date and VIN.

Photo #18

Fuse block assembly, dash area, showing no suspect burn damage, arcing and/or shorting.

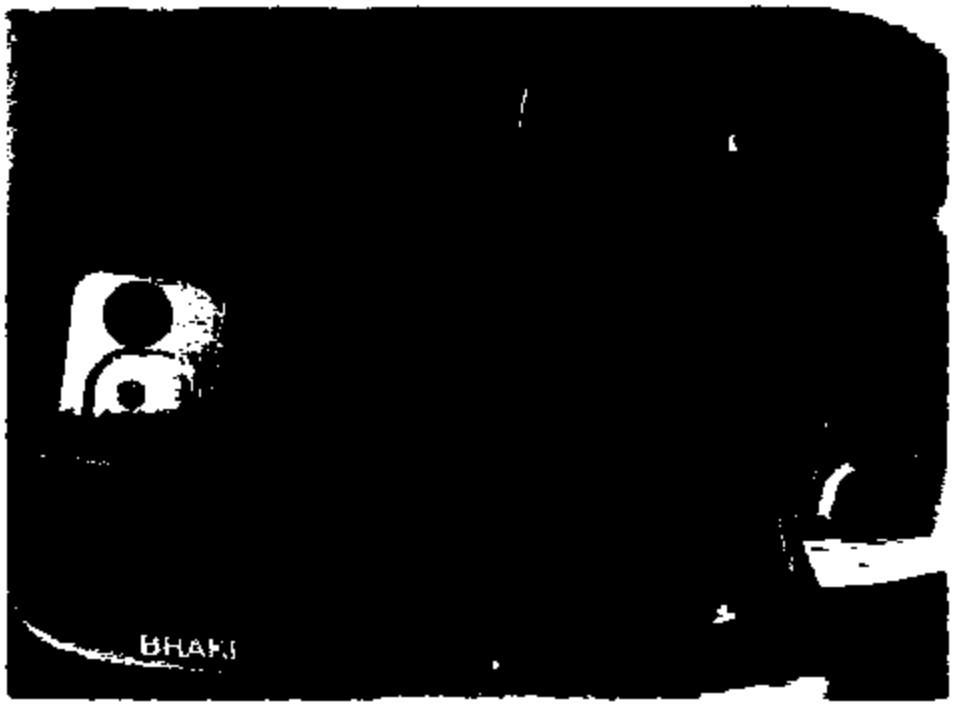


Photo #19

Exterior view of engine compartment hood, showing burn damage to hood and windshield progressing outward, from master cylinder area.

Photo #20

Front view of engine compartment, showing burn damage progressing center right portion photo, master cylinder area.

Photo #21

[redacted]plate, driver dash.

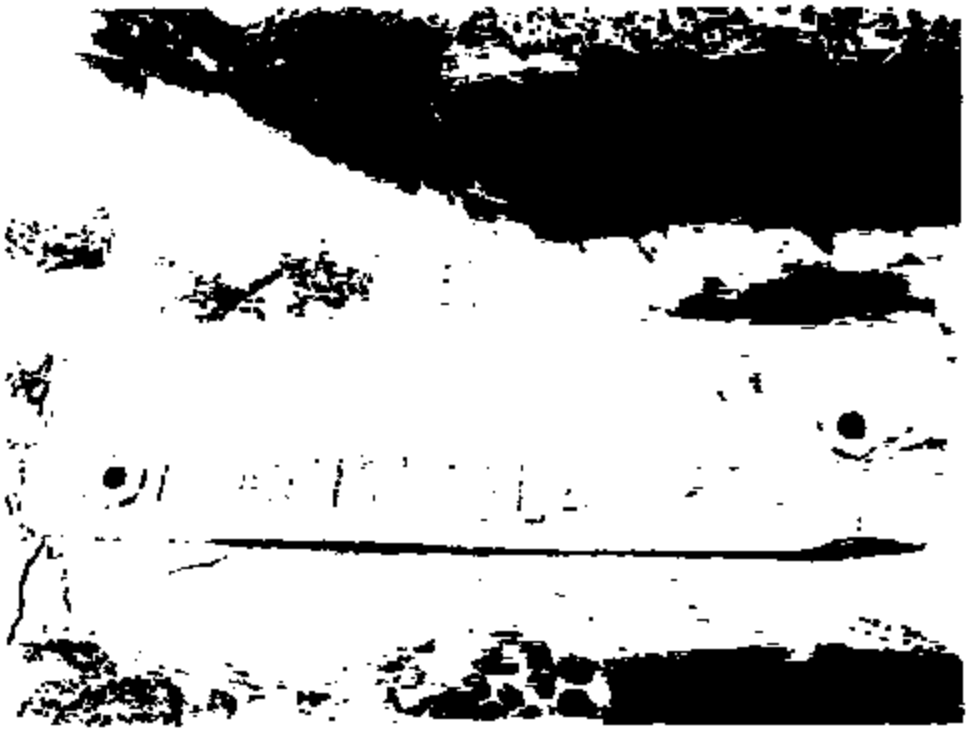


Photo #22

Driver side view of engine compartment, showing burn damage progressing outward, from lower center portion, master cylinder area.

Photo #23

Master cylinder area, showing pressure switch at center with retaining ring severely damaged and fallen over switch.

Photo #24

Overall view of wiring harness at master cylinder, showing no wires progressing to pressure switch at upper right.

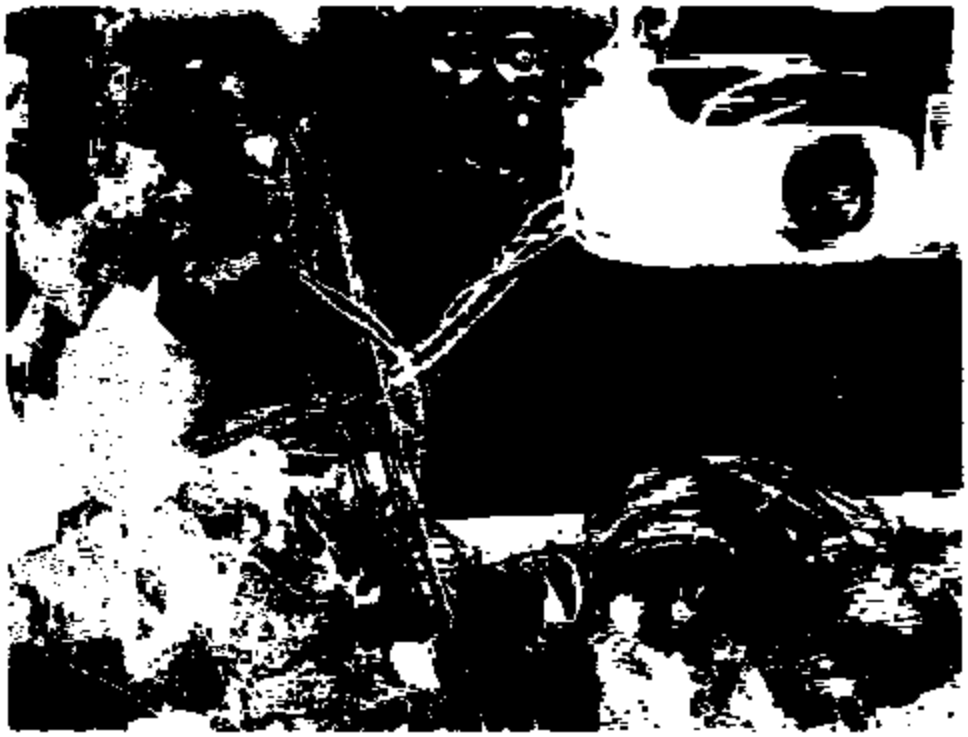


Photo #25

Master cylinder pressure switch, showing compression ring fallen down below, indicating internal heating to switch assembly.

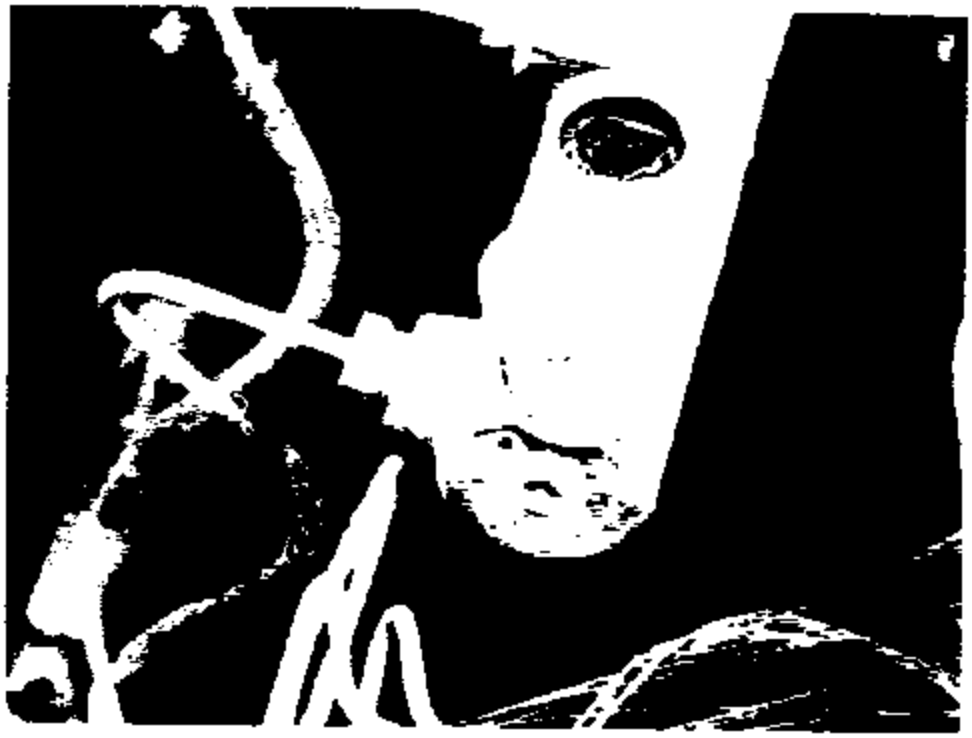


Photo #26

Front view of engine compartment from firewall, showing burn damage progressing lower center portion photo, master cylinder area.

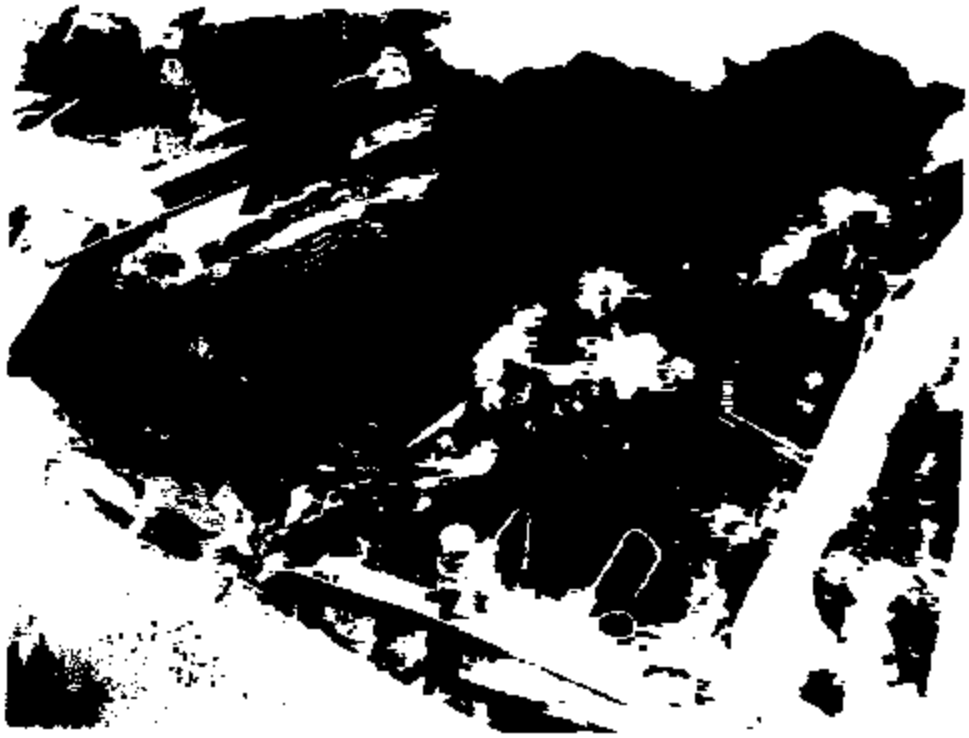


Photo #27

Battery, from passenger portion, showing no suspect burn damage at, to or from.

Photo #28

Master cylinder and electronic switch area, showing no suspect burn damage progressing from electronic switch area, driver splashguard area.

Photo #29

Overall view of engine compartment, showing burn damage progressing outward, from master cylinder, upward along cowling and windshield area.

Photo #30

Overall view of engine compartment, showing master cylinder and pressure switch tagged and protected in Ziploc bag, left in place.

Photo #31

View of tag describing not to remove and protected covering of master cylinder and switch assembly.

A

A2698	TX	01	22	2005	6	05-0000074	0001

B Location*

- [X] Street address: [redacted]
- [ ] Intersection
- [ ] In front of
- [ ] Side of
- [ ] Adjacent to
- [ ] Directions

Lufkin TX [redacted]

C Incident Type *

131 Passenger vehicle fire

D Aid Given or Received*

1 [ ] Paramedic aid received
2 [ ] Automatic aid rec.
3 [ ] Mutual aid given
4 [ ] Automatic aid given
5 [ ] Other aid given
N [X] None

E1 Date & Time — Military or 24HR

	Month	Day	Year	Hr Min Sec
Alarm *	01	22	2005	09:38:00
[X] Arrival *	01	22	2005	09:41:00
[X] Controlled	01	22	2005	09:42:00
[X] Last Unit Cleared	01	22	2005	10:00:00

E2 Shift & Alarm

6 01 6

E3 Special Studies

F Actions Taken *

11 Extinguish

G1 Resources *

[X]

	Apparatus	Personnel
Suppression	0004	0006
EMS		
Other		

G2 Estimated Dollar Losses & Value

Losses:

Property $	0000	000	[ ]
Contents $	000	000	[ ]

Pre-Incident Values:

Property $	000	000	[ ]
Contents $	000	000	[ ]

Completed Modules

- [X] Fire
- [ ] Structure-2
- [ ] Civil Fire Code-4
- [ ] Fire Serv Ser -5
- [ ] Inv-6
- [ ] Hazmat-7
- [ ] Wildland Fire-8
- [X] Apparatus-9
- [X] Personnel-10
- [ ] Arson-11

H1 *Casualties [X] None

	Civilian	Firefighter
Fatal		
Serious		
Minor		

H2 Damage

- [ ] Minor damage
- [ ] Significant damage
- [ ] Total loss

H3 Hazardous Materials Release

0 [ ] None
1 [ ] Natural Gas
2 [ ] Propane gas
3 [ ] Gasoline
4 [ ] Kerosene
5 [ ] Diesel fuel
6 [ ] Household chemicals
7 [ ] Motor oil
8 [ ] Paint
9 [ ] Other

I Hazardous Property

10 [ ] Not used
19 [ ] Assembly use
20 [ ] Educational use
33 [ ] Institutional use
40 [ ] Residential use
51 [ ] Storage of storage
53 [ ] Outdoor storage
58 [ ] Other storage or utility
59 [ ] Not in use
60 [ ] Commercial use
62 [ ] Military use
65 [ ] Farm use
00 [ ] Other known use

J Property Use* Structures

131 [ ] Church place of worship
161 [ ] Restaurant or cafeteria
162 [ ] Bar/Tavern or nightclub
213 [ ] Elementary school or kindergarten
215 [ ] High school or junior high
241 [ ] College adult education
311 [ ] Care facility for the aged
331 [ ] Hospital
341 [ ] Clinic, clinic type infirmary
342 [ ] Doctor/dentist office
361 [ ] Prison or jail not juvenile
419 [ ] 1-or 2-family dwelling
429 [ ] Multi family dwelling
439 [ ] Rooming/boarding house
449 [ ] Commercial hotel or motel
459 [ ] Residential board and care
464 [ ] Dormitory/barracks
519 [ ] Food and beverage sales
539 [ ] Household goods, online sales
579 [ ] Motor vehicle or boat sales
571 [ ] Gas or service station
599 [ ] Business office
615 [ ] Electric generating plant
629 [ ] Laboratory or science lab
700 [ ] Manufacturing plant
819 [ ] Livestock/poultry storage
882 [ ] Parking garage
891 [ ] Warehouse

Outside

124 [ ] Playground or park
655 [ ] Crops or orchard
669 [ ] Forest (timberland)
807 [ ] Outdoor storage area
919 [ ] Dump or sanitary landfill
931 [ ] Open land or field
936 [ ] Vacant lot
938 [ ] Graded/cleared for place of land
946 [ ] Lake, river, stream
951 [ ] Railroad right of way
960 [ ] Other street
961 [ ] Highway/divided highway
962 [ ] Residential street, driveway
981 [ ] Construction site
984 [ ] Industrial storage yard

Property Use 0000

Property Use, Other

ERMS-1 Revision 10/11/94

ER05-005-LC-2292

A AC608 | TX | 91 | 23 | 2005 | 6 | 05-0J00074 | 000

B Property Details

B1 [ ] [X] Are Residential

B2 [ ] [X] Buildings not involved

B3 [ ] [X] Area
[ ] Less than one acre

C On-Site Materials [X] None or Product

NON | None

1 [ ] Bulk storage or warehousing
2 [ ] Processing or manufacturing
3 [ ] Packaged goods for sale
4 [ ] Repair or service

1 [ ] Bulk storage or warehousing
2 [ ] Processing or manufacturing
3 [ ] Packaged goods for sale
4 [ ] Repair or service

1 [ ] Bulk storage or warehousing
2 [ ] Processing or manufacturing
3 [ ] Packaged goods for sale
4 [ ] Repair or service

D Ignition

D1 03 | Engine area, running

D2 UU | Undetermined

D3 UU | Undetermined

D4

E1 Cause of Ignition

1 [ ] Intentional
2 [ ] Unintentional
3 [X] Failure of equipment or heat source
4 [ ] Act of nature
5 [ ] Other human contribution
6 [ ] Cause undetermined after careful evaluation

E2 Factors Contributing to Ignition

UU | Undetermined [X] None

E3 Human Factors Contributing to Ignition

1 [ ] Alcohol [ ] Drugs
2 [ ] Reliance upon by the owner of property
3 [ ] Unattended cooking
4 [ ] Mentally ill or disabled
5 [ ] Physically disabled
6 [ ] Multiple persons involved
7 [ ] Not a factor

Estimated age of person involved

1 [ ] Male 2 [ ] Female

F1 Equipment Involved In Ignition

[ ] None if equipment was not involved, skip to section G

F2 Equipment Power

F3 Equipment Portability

1 [ ] Portable
2 [ ] Stationary

G Fire Suppression Factor

Enter up to three codes. [ ] None

H1 Mobile Property Involved

[ ] None

1 [ ] Not involved in ignition, not burned
2 [ ] Involved in ignition, but did not burn
3 [X] Involved in ignition and burned

H2 Mobile Property Type & Make

01 | Passenger car

FO | Ford

Local Use

[ ] Fire/Site Plan Available

[ ] Area report attached
[ ] Related report attached
[ ] Incident photos attached
[ ] Other material attached

expedition | 2001

[redacted] | TX | 12MRU1SW02A [redacted]

EA05-005-LC-2253

K. Person/Entity Involved

☐ Other

☐ More persons involved? Check this box and attach Supplemental Form (HCFA-[illegible]) as necessary

K. Owner ☐

☐ Other

L. Remarks

L. Authorization

FARMERS
75 YEARS SERVING AMERICA

$01.52°
2005

National Document Center
P. O. Box 268994
Oklahoma City, OK 73126-8994

First Class Mail

Shawn Norton
Ford Motor Company
Parklane Towers West, Ste 300
Three Parklane Blvd
Dearborn, MI 48126-2568

ER05-085-LC-2205

First Class Mail

26-8230(01-05)(M35)

EM95-005-LC-72208

ISSUE LIST

Last Handling Date/ Issue Status	Name/ Reason Desc	Vin/ Case No.	Model Year and Vehicle Line	Issue Type
2/18/2005	CHARLES POLK	1FMRU15W02[redacted]	2002 EXPEDITION	02
CLOSED	LEGAL - CUSTOMER WAITING FOR ACKNOWLEDGEMENT	1558770455		
2/15/2005	CHARLES POLK	1FMRU15W02[redacted]	2002 EXPEDITION	07
CLOSED	LEGAL - ACCIDENT / FIRE	1558770455		

ERMS-000-LC-2257

All Action Details for Issue

Print

VIN: 1FMRU15W02[redacted] **Year:** 2002 **Model:** EXPEDITION **Case:** 1SS8770455
Name:[redacted] **Owner Status:** Subsequent **WSD:** 2001-11-17
Symptom Desc: FIRE/SMOKE VISIBLE FLAME UNDERHOOD **Primary Phone:**[redacted]
Reason Desc: LEGAL - CUSTOMER WAITING FOR ACKNOWLEDGEMENT **Secondary Pho**[redacted]
Issue Type: 02 INFORMATION **Issue Status:** CLOSED

Action: CB-IT MAY TAKE 7 DAYS FOR CONSUMER AFFAIRS TO BEGIN INVESTIGATE
Dealer: 04529 AL MEYER FORD, INC. **Origin Desc:** US CONCERN CASE BASE
Odometer: 63000 MI **Comm Type:** PHONE
Analyst Name: **Analyst:** SWILL304
Action Date: 02/18/2005 **Action Time:** 14.04.37.064 **Action Data:** No

Comments CUSTOMER SAID: –VEH CAUGHT FIRE ONN THE 01/22/05–THE INCIDENT WAS REPORTED TO THE INSURANCE COMPANY– FARMERS GROUP–THE INSURANNCE AGENT SENT OUT A FIRE INVESTIGATOR AND THEY DETERMINED THAT IT WAS THE SPEED CONTROL DEACTIVATION SWITCH–RECEIVED A PHONE CALL FROM THE SUBROGATION UNIT–THEY ADVISED THAT FORD WOULD NOT BE COMING OUT AND IF THEY DID COME THEY WILL GOING TO THE SCRAP UNIT –THE INSURANCE PAID A SUM OF OVER $18000 AND CUST IS LEFT WITH AROUND $3000-SEEKING TO HAVE FORD ADDRESS THE ISSUE AS THIS WAS DUE TO A DEFECT IN THE SPEED CONTROL DEACTIVATION SWITCHDEALER SAID: AL MEYER FORD INC 800 N MEDFORD DRLUFKIN, TX 75901 TEL: (936) 632-6811CRC ADVISED: THANK YOU FOR CONTACTING US IN RELATION TO YOUR ONGOING CASE. CONSUMER AFFAIRS INVESTIGATIONS MAY TAKE UP TO 7 DAYS TO INITIATE. LET ME ASSURE YOU THAT THIS TYPE OF SITUATION IS A HIGH PRIORITY FOR FORD MOTOR COMPANY. I HAVE VERIFIED YOUR CONTACT INFORMATION TO ENSURE WE CAN CONTACT YOU WHEN FURTHER INFORMATION IS AVAILABLE OR REQUIRED.–ADVISED AS PER ABOVE–ADVISED OF NEXT STEP- STAY IN TOUCH WITH THE S/M

EP03-003-LC-2298

All Action Details for Issue

Print

VIN: 1FMRU15W02L[redacted] Year: 2002 Model: EXPEDITION Case: 1558770455
Name: [redacted] Owner Status: Subsequent WSD: 2001-11-17
Symptom Desc: FIRE/SMOKE SCORCHED/BURNT PASSENGER AREA Primary Phone: [redacted]
Reason Desc: LEGAL - ACCIDENT / FIRE Secondary Pho[redacted]
Issue Type: 07 LEGAL Issue Status: CLOSED

Action: ADVISE CUST INFORMATION WILL BE SENT TO CONSUMER AFFAIRS - FIRE
Dealer: 04529 AL MEYER FORD, INC. Origin Desc: US CONCERN CASE BASE
Odometer: 1 MI Comm Type: PHONE
Analyst Name: HILL CHRISTOPHER SCOTT Analyst: CHILL79
Action Date: 02/14/2005 Action Time: 15.31.16.581 Action Data: No

Caller Information If Different From Vehicle Owner:

First Name	Middle Initial	Last Name	Day Phone	Relationship
SHANNA		POLK	9368370932	SPOUSE

Comments CUSTOMER SAID: -WHEN IS SOMEONE GOING TO LOOK AT THE VEH-INSURANCE CO. SAID THAT FORD IS GOING TO COME AND LOOK AT THE VEH-THE VEH CONDITION IS AFFECTING THE CUSTS HEALTH-VEH CAUGHT ON FIRE, JAN 22, 2005, IN LUFKIN TEXAS-VEH IS CURRENTLY AT CUSTS HOME-FIRE REPORT WAS FILED, DOESN'T HAVE THE NUMBER, THE FINDINGS WERE THAT THE FIRE WAS RELATED TO THE CRUISE CONTROL-HAS FILED A CLAIM AND IS IN PROCESS TO BE PAID-OUTDEALER SAID: -NONEAL MEYER FORD INC800 N MEDFORD DRLUFKIN, TX 75901TEL: (936) 632-8611CRC ADVISED: - I WILL FORWARD THIS INFORMATION TO OUR CONSUMER AFFAIRS GROUP. SOMEBODY FROM CONSUMER AFFAIRS WILL CONTACT YOU IN 2 BUSINESS DAYS. PLEASE NOTIFY YOUR INSURANCE CARRIER AND REPORT THIS INCIDENT.

Action: SEND ACKNOWLEDGEMENT LETTER TO CUSTOMER
Dealer: 04529 AL MEYER FORD, INC. Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION
Odometer: 1 MI Comm Type: MAIL
Analyst Name: FONSECA, LOURDES NEARON (L.C.) Analyst: LFONSECA
Action Date: 02/15/2005 Action Time: 14.13.18.158 Action Data: No

Comments LPA WILL SEND INSURANCE PREVIOUSLY INVOLVED LETTER. MILEAGE NOT AVAILABLE.

Action: REFER TO INSURANCE CARRIER - INSURANCE COMPANY ALREADY INVOLVED
Dealer: 04529 AL MEYER FORD, INC. Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION
Odometer: 1 MI Comm Type: MAIL
Analyst Name: FONSECA, LOURDES NEARON (L.C.) Analyst: LFONSECA
Action Date: 02/15/2005 Action Time: 14.13.46.890 Action Data: No

Comments LPA WILL SEND INSURANCE PREVIOUSLY INVOLVED LETTER. MILEAGE NOT AVAILABLE.

BMS-005-LC-2258

FARMERS

National Document Center
P.O. Box 268992
Oklahoma City, OK 73126-8992
claimsdocument@farmersinsurance.com
Fax : 877-217-1389

CONSUMER AFFAIRS SECTION

5 FEB 20 P 3:44

02/18/2005

509019

Ford Motor Company
Attn: Shawn Norton
P.O. Box 6248 - Md-3ne-B
Dearborn, MI 48126-2568

Julie
Fire

Re: Our Insured: [redacted]
Loss Date: 01/22/2005
Claim Number: 099 SUB[redacted]
Total Amount Owed: $18,704.63

Dear Ms. Norton,

A review of the facts of the above loss indicates that your product failed and caused damage to our insured's property. We have made payment to our insured for these damages, and now seek reimbursement from you. WE RESPECTFULLY ASK THAT YOU NOT RESPOND TO OUR REQUEST WITH A FORM LETTER.

You will find this correspondence and its enclosures contain substantive information and support adequate for your firm to make a decision concerning your liability. ***The vehicle will be available for your inspection during the next 60 days. Afterwards, we will be required to attempt to sell the salvage.***

The entities in the stream of commerce, such as you, a manufacturer, are liable in both negligence and product liability. As you know, your obligation is to properly design and test, manufacture, and give appropriate instructions for installation and use of your product.

Your product did not meet the expectations of my insured, the consumer. Your product failed and caused the loss resulting in damages of 18,204.63. Attached are documents substantiating payment.

It is our desire to settle this claim without causing you the additional time and cost of litigation or arbitration. After reviewing the enclosed, please call me to discuss resolving this matter.

Sincerely,
Mid-Century Insurance Company of Texas

Scott Sheffield

Scott Sheffield
Auto Subrogation Representative
512-238-5739

ENCLOSURES

Payment Log

FARMERS

Claim Number :

Date of Loss: 1/22/2005 9:30:22 AM

Insured's Name :

Benefit Type :

Check Number	Service From Date	Service To Date	Payee	Date Issued	Date Paid	Amount
			HOUSEHOLD AUTO FINANCE	02/15/2005		$18204.63
				Benefit Type Total :		$18204.63
				Total Amount Paid :		$18204.63

Comments : This amount does not include our insured's $500 deductible.

View Screens Go Query Reports Application Help

Queries

Threads Claim 1006053433-1 Claim Element:

Claim Units

Unit Number	Related Unit	Status	Unit Type*	Unit Sub Type	Expense Payment Aut
1006053433-1-1		Closed	Comp	Luf TL fire	

Vehicle Information

Year	02	Serial Number/ Trailer ID	
Make	FORD	VIN	1FMRU15W02L
Model	EXPEDIT	Inspected VIN	1FMRU15W02L
Mileage	63,991	Boat	

Dates

Unit Assigned	1/22/2005	TL Packet Sent To	
Reported to		TL Packet Read From	
Assigned to		Title/Paperwork Sent To	
Salvage Pool			
Settled			

Settlement Detail

Send Settlement Tail

Valuation	CCC
Valuation	$17,175.00
Adjustment	$403.00
Actual Cash	$17,578.00
Sales Tax	$1,098.63
Lic./Transfer	$28.00
Other Fee	$0.00
Deductible	$500.00
Salvage	$0.00
Net Total	$18,204.63

Launch Valuation Too

Valuation	33619132
Additional Details	Evaluation
Towing Fees	$0.00
Storage Fees	$0.00
Lien	$0.00
Residual	$0.00
Customer	$0.00
Mortgages	$0.00

CCC Settlement Tail Information

Send | Receive | Status | Retry | Send | Host

Create Salvage Unit

Address	[redacted]	Salvage	02
City	LUFKIN	Salvage	FORD
Country	USA	Salvage	EXPEDITION
Phone	[redacted]	Salvage	
Fax		Salvage On	
State	TX		
Zip	[redacted]		

Date Inspected	
Recovered Theft	
Title	
Location	Residence
Location	[redacted]
Comments	

Item: 1 of 1 NUM

CCC VALUESCOPE
Claim Services

Mid-Century Insurance Company of Texas
Market Report

Report Reference Number: 33619132
Claim reference: [redacted]
Loss Incident Date: 01/22/2005
Insured: Polk
Policy Number: [redacted]

Adjuster: Young,Aaron
USW#: ANY41
Date Submitted: 01/26/2005

Appraiser: YOUNG,AARON

Introduction

Mid-Century Insurance Company of Texas has conducted an appraisal of your 2002 Ford Expedition 4X2 XLT 4 door Sports Utility located in Lufkin, TX. The appraisal information was then used to conduct research in your local market to determine the local market value of your car. This CCC ValueScope Market Report details the results of that research. It contains the following sections:

Section Title:	Section Contents:
Vehicle Valuation Summary	Market Valuation with components
VINguard Vehicle Identification	Vehicle configuration information
VINguard VIN Vehicle History	Vehicle history research
Local Market Definition	Local market basis
Valuation Methodology	Method used to evaluate the vehicle
Vehicle Condition	Vehicle's pre-accident condition
Local Market Comparable Vehicles	Comparable vehicles located in market
Vehicle Model Information	Characteristics of the loss vehicle type
NHTSA Vehicle Recall	NHTSA recall notices
Appraisal and Valuation Notes	Log notes for this file

Valuation request: 33619132 (continued) 2002 FORD EXPEDITION 4X2 XLT

========== Vehicle Valuation Summary ==========

DESCRIPTION	OPTION	LOCAL MARKET VALUE
Base value **		$ 17,209.00
Odometer 63,991		- 692.00
Vehicle equipment:		
STD	AT - Automatic Transmission	INCLUDED
STD	OD - Overdrive	INCLUDED
STD	PS - Power Steering	INCLUDED
STD	PB - Power Brakes	INCLUDED
STD	PW - Power Windows	INCLUDED
STD	PL - Power Locks	INCLUDED
STD	SP - Power Driver Seat	INCLUDED
STD	PM - Power Mirrors	INCLUDED
STD	AC - Air Conditioning	INCLUDED
STD	RD - Rear Defogger	INCLUDED
STD	TW - Tilt Wheel	INCLUDED
STD	CC - Cruise Control	INCLUDED
STD	CS - Cloth Seats	INCLUDED
STD	DB - 4-Wheel Disc Brakes	INCLUDED
STD	DM - Dual Mirrors	INCLUDED
STD	KE - Keyless Entry	INCLUDED
STD	3S - 3rd Seat	INCLUDED
STD	AM - AM Radio	INCLUDED
STD	FM - FM Radio	INCLUDED
STD	ST - Stereo	INCLUDED
STD	CA - Cassette	INCLUDED
STD	SE - Search/Seek	INCLUDED
	SK - CD Changer/Stacker	+ 300.00
	TQ - Steering Wheel Touch Control	+ 58.00
STD	RR - Luggage/Roof Rack	INCLUDED
STD	SB - Rear Step Bumper	INCLUDED
	MP - Metallic Paint	INCLUDED
STD	DT - Privacy Glass	INCLUDED
	RD - Running Boards/Side Steps	+ 150.00
STD	AB - Anti-Lock Brakes (4)	INCLUDED
STD	AG - Air Bag	INCLUDED
STD	RG - Passenger Air Bag	INCLUDED
	AW - Aluminum/Alloy Wheels	+ 150.00
STD	BM - Body Side Moldings	INCLUDED
STD	IW - Intermittent Wipers	INCLUDED
STD	WP - Rear Window Wiper	INCLUDED
CCC Valuation Amount		$ 17,175.00
Condition adjustment amount		+ 403.00
Actual Cash Value		$ 17,578.00
Pre-tax amount		$ 17,578.00

Valuation request: 33619132 (continued) 2002 FORD EXPEDITION 4X2 XLT

==========: Vehicle Valuation Summary (continued) ==========

Adjusted vehicle valuation amount $ 17,578.00

** The base value is the local market value of a vehicle of the same year, make, and model as the loss vehicle, including average mileage, and all standard (STD) and predominant (PREDOM) options.
As such, the vehicle equipment listing reflect deductions for all standard or predominant option(s) which are not present on the loss vehicle.
In cases where a standard or predominant option is superseded by a replacement or upgrade, a corresponding addition will appear for the option which supersedes the standard/predominant option.
Package options are options included with that package.
Non-factory options were not available from the factory at the time this vehicle was manufactured and any such options were installed at different location at a later date.

========== VINguard Vehicle Identification ==========

VIN: 1FMRU15W02[redacted]

	Insurer Description	VINguard Analysis
Year	2002	2002
Make	Ford	Ford
Model	Expedition 4X2 XLT U15	Expedition 4X2 XLT U15
Body style	4d Utv	
Engine	8-4.6l-Fi	8-4.6l-Fi
Trans	Automatic Transmission Overdrive	
Restraints	AIR BAGS (DRIVER+PASS.)	Air Bags (Driver+Pass.)
Curb Weight		4,909
Odometer	63991 Note: 21% higher than typical vehicle	

This vehicle was assembled in WAYNE, MI

========== VINguard VIN Vehicle History ==========

VINguard has decoded this VIN without any errors.

****
* WARNING - VINguard has detected prior event(s) in this vehicle's history. *
* Please review the information detailed below. *
****

ISO Vehicle History:
Number of times reported to ISO: 1 ISO's file number: H0102949165

Valuation request: 33619132 (continued) 2002 FORD EXPEDITION 4X2 XLT

========== VINguard VIN Vehicle History (continued) ==========
Activity reported: Property & Casualty 01/22/2005
Insurance company: Farmers Insurance Exchange Phone: (409) 832-1036
Claim number: 100605343311

========== CARFAX Vehicle History ==========

VIN: 1FMRU15W02[redacted]

CARFAX searched its nationwide database of nearly 2 billion records to provide you with this detailed vehicle history. Avoid making a potentially costly mistake when buying your next used car. Order a CARFAX Vehicle History Report at www.carfax.com.

CARFAX RESULTS

DATE REPORTED	ODOMETER READING	INFORMATION SOURCE	GENERAL COMMENTS
10/13/2001			
10/13/2001			dealer
11/17/2001		Texas Motor Vehicle Dept. Nacogdoches, TX	Registered as personal vehicle
12/19/2001	15	Texas Motor Vehicle Dept. Nacogdoches, TX Title #00330337230141314	Title issued or updated First owner reported Loan or lien reported
08/11/2003	30,506	Service Facility	Vehicle serviced
10/07/2003	31,241	Texas Motor Vehicle Dept. Lufkin, TX Title #00300037891103307	Title issued or updated New owner reported Loan or lien reported

Valuation request: 33619132 (continued) 2002 FORD EXPEDITION 4X2 XLT

========== CARFAX Vehicle History (continued) ==========

DATE REPORTED	ODOMETER READING	INFORMATION SOURCE	GENERAL COMMENTS

This coupon is courtesy of CARFAX Vehicle History Service. With CARFAX you can get the real history for virtually any car or truck on the road today.

- -

F R E E C A R F A X R E P O R T

Bring this coupon to any CARFAX Certified Dealer to view a FREE CARFAX Vehicle History Report on any vehicle in stock.

GET THE REAL HISTORY
ON ANY USED CAR.

Ask about our
CARFAX Buyback
Guarantee
We miss it...
We buy it!

CARFAX www.carfax.com a POLK company

- -

========== Local Market Definition ==========

The local market value for your 2002 Ford Expedition 4X2 XLT 4 Door Sport Utility Vehicle was defined by ZIP code 75901 -- Lufkin, Tx. Adjacent markets were also searched as secondary sources to locate comparable vehicles. Details of the specific markets searched follow.

The State of Texas is composed of 21 distinct local markets. The following 5 zones were used in the preparation of this CCC Valuescope Market Report.

East Central Texas, - Primary local market vehicle database.
In this market, CCC maintains a database of 2,194 dealer advertised, and 692 privately advertised vehicles taken from 16 local papers or magazines.

Beaumont, TX - Secondary local market vehicle database.
In this market, CCC maintains a database of 1,266 inspected dealer vehicles located at 10 dealerships, and 4,178 dealer advertised, and 2,182 privately advertised vehicles taken from 13 local papers or magazines.

Houston, TX - Third local market vehicle database.
In this market, CCC maintains a database of 9,645 inspected dealer vehicles located at 42 dealerships, and 54,928 dealer advertised, and 19,956 privately advertised vehicles taken from 32 local papers or magazines.

Other markets searched - Austin and Corpus Christi. . . were also searched.

In these markets, CCC maintains a database of 8,212 inspected dealer vehicles located at 34 dealerships, and 35,278 advertised vehicles taken from 41 local newspapers or magazines.

========== Local Market Definition (continued) ==========
From these 5 local markets, comparable vehicles were selected based on the year, make, model, body style, and engine configuration of your vehicle. Adjustments were made to the value of each comparable vehicle to compensate for differences in year, model, body style, engine configuration, packages, options, and mileage.

For your vehicle's CCC Valuescope Market Report, CCC identified 20 inspected dealer vehicles as comparable to your vehicle, and used their values to determine the Local Market Value.

Vehicles are determined to be comparable to the loss vehicle based on:

* Nearness to the loss vehicle's primary garage location
* Similarity of model, equipment, and odometer
* Precision of the data (inspected versus advertised)

========== Valuation Methodology ==========

This CCC Valuescope Market Report was prepared for Mid-Century Insurance Company of Texas by CCC Information Services Inc. CCC has been preparing market reports for the insurance industry since 1981. CCC physically inspects vehicles for sale at vehicle dealerships in the local markets, and subscribes to local newspapers and automotive publications in these markets. CCC maintains vehicle databases containing these inspected dealership vehicles along with the dealer and private party advertised vehicle information.

When Mid-Century Insurance Company of Texas requests a CCC Valuescope Market Report from CCC, they provide CCC the VIN (Vehicle Identification Number) of the loss vehicle. Decoding this VIN identifies the exact vehicle for which the local market value will be done. See the VINguard Vehicle Identification section.

Mid-Century Insurance Company of Texas also provides CCC the vehicle owner's Zip code. This identifies the local market that will be used to determine the market value. See the Local Market Definition section.

Finally, Mid-Century Insurance Company of Texas provides CCC with the configuration of the loss vehicle including equipment, odometer, condition, maintenance, etc. This information is the starting point for determining the local market value.

Using this information, CCC searches its databases to find comparable vehicles in the local market. Each vehicle is compared to the loss vehicle, and adjustments are made for differences in model, equipment, and odometer. Those vehicles that are deemed most comparable to the loss vehicle are used to determine the local market value. See the Local Market Definition section.

After the Adjusted Value for each comparable vehicle is calculated (see the Local Market Comparable Vehicles section), CCC calculates the Local Market Value. This calculation is a weighted average. Using a weighted average allows those vehicles most similar to the loss vehicle to contribute a greater percentage to the Local Market Value than less similar vehicles. Factors that determine similarity are:

* Nearness to the loss vehicle's primary garage location
* Equivalency of model, equipment, and odometer
* Precision of the data (inspected versus advertised)

Using a weighted average results in more accurate local market value as the vehicles most similar and closest to the loss vehicle contribute more to the market value than less similar, more distant vehicles.

Valuation request: 33619132 (continued) 2002 FORD EXPEDITION 4X2 XLT

Vehicle Condition

Mid-Century Insurance Company of Texas uses Condition Inspection Guidelines to determine the condition of key components of the loss vehicle. These guidelines are specific to geographic location, year, and vehicle type. The guidelines describe physical characteristics for each of the vehicle components. Based on these guidelines, Mid-Century Insurance Company of Texas determined the condition of the vehicle prior to the loss.

Category	Condition	Adjustments
INTERIOR		
Seats	Dealer ready	$70
CR Comments:	CLEAN. NO SIGNIF FADING.	
Carpets	Normal wear	$0
CR Comments:	LIGHT SOILING/STAINS.	
Dashboard	Dealer ready	$35
CR Comments:	COMPONENTS INTACT. NO SIGNIF WAR.	
Headliner	Dealer ready	$70
CR Comments:	CLEAN. NO TEARS SAGS.	
EXTERIOR		
Sheet Metal	Normal wear	$0
CR Comments:	REAR BUMPER DAMAGED. LARGE DENT. NO RUST EVIDENT.	
Trim	Dealer ready	$140
CR Comments:	NO SIGNIF RUST. COMPONENTS INTACT.	
Paint	Dealer ready	$70
CR Comments:	SMALL/FEW SURFACE SCRATCHES.	
Glass	Normal wear	$0
CR Comments:	BURNT & BROKE DUE TO LOSS.	
MECHANICAL		
Engine	Normal wear	$0

Valuation request: 33619132 (continued) 2002 FORD EXPEDITION 4X2 XLT

Category	Condition	Adjustments
CR Comments:	TOTAL BURN	
Transmission	Normal wear	$0
CR Comments:	TOTAL BURN.	
TIRES		
Front Tires	Dealer ready	$18
CR Comments:	AVG TREAD DEPTH 11/32	
Rear Tires	Normal wear	$0
CR Comments:	AVG TREAD DEPTH 7/32 (LT RR 4/32 RT RR 10/32	
Total Adjustments:		$403

* The Condition Inspection Guidelines provide information based on vehicle age, vehicle type, and geographic location. Your vehicle has been identified as being located in the region as a newer truck.

* The Condition Inspection Guidelines, and all dollar adjustments, are determined by surveys, inspections, and interviews with dealerships across the United States.

Valuation request: 33619132 (continued) 2002 FORD EXPEDITION 4X2 XLT

Local Market Comparable Vehicles

The local market comparable vehicles are compared to the loss vehicle, and adjustments are made for differences in equipment, odometer, model, etc. The Adjusted Value represents the price of the comparable if configured exactly as the loss vehicle.

Loss Vehicle	Inspected Dealer	Inspected Dealer	Inspected Dealer
2002 Ford Expedition 4x2 Xlt 4d Utv 8-4.6l-fi Auto Trans-OD Air Conditioning AM/FM Stereo Seek Tape And Cd Changer	2002 Ford Expedition 4x2 Xlt 4d Utv 8 Auto Trans-OD Air Conditioning AM/FM Stereo Seek Tape And Cd Changer	2002 Ford Expedition 4x2 Xlt 4d Utv 8 Auto Trans-OD Air Conditioning AM/FM Stereo Seek Tape And Cd Changer	2002 Ford Expedition 4x2 Xlt 4d Utv 8 Auto Trans-OD Air Conditioning AM/FM Stereo Seek With Tape Cassette
Opts On Comp Veh:		Leather Seats	Theft Deterrent/Alarm
Opts Not On Comp:	Steering Wheel Touch Controls Aluminum/Alloy Wheels	3rd Seat Steering Wheel Touch Controls Aluminum/Alloy Wheels	Steering Wheel Touch Controls Aluminum/Alloy Wheels
Miles: 63,991	67,876	49,849	46,000
	Insp. 1/24/2005	Insp. 1/12/2005	Insp. 1/24/2005
Location:	Houston	Beaumont	Stafford
Distance From: Lufkin	121	90	128
Dealer:	Russell Smith Ford	Kingel Auto Mall Br	Melfman Ford
Contact Person:	[redacted]	[redacted]	[redacted]
Phone Number:			
VIN:	1FMRU15L72L[redacted]	1FMRU15L82L[redacted]	1FMRU15W82[redacted]
	Stock# F13147a	Stock# Fm0408bt	Stock# Gm125b
	List $ 17,588	List $ 19,888	List $ 20,150
	Take $ 17,588	Take $ 18,988	Take $ 19,150
Adjustments			
Model/Year	- 350	- 350	
Radio Options		- 150	+ 300
Opts On Comp Veh:		- 400	- 150
Opts Not On Comp:	+ 208	+ 308	+ 208
Mileage	- 1,037	- 912	- 1,149
Baseline	- 683	- 683	- 683
	$ 15,726	$ 15,801	$ 17,676
Adjusted Value			

Valuation request: 33619132 (continued) 2002 FORD EXPEDITION 4X2 XLT

========== Local Market Comparable Vehicles (continued) ==========

Loss Vehicle	Inspected Dealer	Inspected Dealer	Inspected Dealer
2002 Ford Expedition 4x2 Xlt 4d Utv 8-4.6l-Fi Auto Trans-OD Air Conditioning AM/FM Stereo Seek Tape And Cd Changer	2002 Ford Expedition 4x2 Xlt 4d Utv 8 Auto Trans-OD Air Conditioning AM/FM Stereo Seek With Tape Cassette	2002 Ford Expedition 4x2 Xlt 4d Utv 8 Auto Trans-OD Air Conditioning AM/FM Stereo Seek Tape And Cd Changer	2002 Ford Expedition 4x2 Xlt 4d Utv 8 Auto Trans-OD Air Conditioning AM/FM Stereo Seek With Tape Cassette
Opts On Comp Veh:	Dual Air Conditioning	Theft Deterrent/Alarm Leather Seats Trailering Package	Dual Air Conditioning
Opts Not On Comp:	3rd Seat Steering Wheel Touch Controls Aluminum/Alloy Wheels	Steering Wheel Touch Controls Aluminum/Alloy Wheels	Steering Wheel Touch Controls Aluminum/Alloy Wheels
Miles: 63,991	72,549	45,550	44,736
	Insp. 1/21/2005	Insp. 1/24/2005	Insp. 1/12/2005
Location:	Corpus Christi	Stafford	Bryan
Distance From: Lufkin	298	128	107
Dealer:	Eddie Yaklin Super	Helfman Ford	Jim Whitley Motors
Contact Person:	[redacted]	[redacted]	[redacted]
Phone Number:			
VIN:	1FMRU15W61[redacted]	1FMRU15W82[redacted]	1FMRU15W92[redacted]
	Stock# 9761a	Stock# Z3245	Stock# 1667
	List $ 18,995	List $ 21,450	List $ 17,995
	Take $ 18,995	Take $ 20,450	Take $ 17,995
Adjustments			
Radio Options	+ 300		+ 300
Opts On Comp Veh:	- 400	- 700	- 400
Opts Not On Comp:	+ 308	+ 208	+ 208
Mileage	+ 446	- 1,175	- 1,222
Baseline	- 683	- 683	- 683
Adjusted Value	$ 18,966	$ 18,100	$ 16,198

* List Price is the sticker price of the vehicle. Take Price is the amount for which the vehicle can be purchased as defined by the contact at each dealer.

* The baseline is defined as the typical vehicle on the road. A typical vehicle has not been prepared for sale. Baseline Adjustment aligns a dealer ready vehicle with the typical vehicle on the road.

Valuation request: 33619132 (continued) 2002 FORD EXPEDITION 4X2 XLT

========== Local Market Comparable Vehicles (continued) ==========

Loss Vehicle	Inspected Dealer	Inspected Dealer	Inspected Dealer

* All dollar adjustments are determined by surveys, inspections, and interviews with dealerships across the United States.

========== Additional Inspected Vehicles ==========

Dealer/Location/Yr Model/ VIN Stock# Color	Phone/Odometer	Price	Compared to Loss
Eddie Yaklin Super Center Corpus Christi, Tx. 298 Miles From Lufkin 2002 Expedition 4x2 Xlt 1FMRU15W62[redacted] 9899A Blue	(361) 857-7002 79,991 A	$ 18,995	$ 19,196
Sterling Mccall Toyota Houston, Tx. 123 Miles From Lufkin 2002 Expedition 4x2 Xlt 1FMRU15W22[redacted] 48874A White	(713) 270-3948 37,019 A	$ 21,570	$ 18,930
Bayway Lincoln-Mercury Houston, Tx. 121 Miles From Lufkin 2002 Expedition 4x2 Xlt 1FMRU15W02C[redacted] 4338AK Bge	(281) 929-6500 29,918 A	$ 18,975	$ 16,888
Helfman Super Store Houston, Tx. 107 Miles From Lufkin 2002 Expedition 4x2 Xlt 1FMRU15W42L[redacted] Y1584 White	(281) 530-3673 31,924 A	$ 20,995	$ 18,836
Champion Ford/Mazda Corpus Christi, Tx. 296 Miles From Lufkin 2002 Expedition 4x2 Xlt 1FMRU15W62[redacted] 2LA70078 Blue	(361) 994-6200 50,638 A	$ 16,893	$ 15,408
Bossier Automotive Bryan, Tx. 107 Miles From Lufkin 2002 Expedition 4x2 Xlt 1FMRU15W92[redacted] 5240A Sil	(979) 823-8111 38,317 A	$ 18,988	$ 16,608
Helfman Super Store Houston, Tx. 107 Miles From Lufkin 2002 Expedition 4x2 Xlt 1FMRU15W62[redacted] GM068A Blk	(281) 530-3673 31,959 A	$ 21,950	$ 19,243

Valuation request: 33619192 (continued) 2002 FORD EXPEDITION 4X2 XLT

==========> Additional Inspected Vehicles (continued) ==========

Dealer/Location/Yr Model/ VIN Stock# Color	Phone/Odometer	Price	Compared to Loss
Eddie Yeklin Super Center Corpus Christi, Tx. 298 Miles From Lufkin 2002 Expedition 4x2 Xlt 1FMRU15L92[redacted] 9170A Blue	(361) 857-7002 49,140 A	$ 20,995	$ 19,062
Russell Smith Ford Houston, Tx. 121 Miles From Lufkin 2002 Expedition 4x2 Eddie Bauer 1FMRU17W02[redacted] 58915B Blue	(713) 663-4111 59,879 A	$ 18,988	$ 14,269
Russell Smith Ford Houston, Tx. 121 Miles From Lufkin 2002 Expedition 4x2 Eddie Bauer 1FMRU17W12[redacted] 59405A Blk	(713) 663-4111 55,930 A	$ 17,988	$ 13,166
Kinsel Auto Mall Pre-Owed Beaumont, Tx. 90 Miles From Lufkin 2002 Expedition 4x2 Xlt 1FMRU15L32[redacted]	(409) 899-4000 52,195	$ 16,988	$ 15,008
Silsbee Toyota Auto Center Silsbee, Tx. 72 Miles From Lufkin 2002 Expedition 4x2 Xlt 1FMRU15W62[redacted]	(800) 464-2749 39,681	$ 19,500	$ 17,435
Balfman Ford Stafford, Tx. 128 Miles From Lufkin 2002 Expedition 4x2 Xlt 1FMRU15WX2[redacted]	(281) 274-7200 30,524	$ 19,500	$ 17,136
Silsbee Toyota Auto Center Silsbee, Tx. 72 Miles From Lufkin 2002 Expedition 4x2 Xlt 1FMRU15L22[redacted]	(800) 464-2749 45,295	$ 19,950	$ 17,635

A=available

========== NHTSA Recall Notices ==========

The National Highway Traffic Safety Administration has issued 2 safety related recall notices that may apply to the above valued vehicle. For additional information or assistance, call CEC customer service at 1-800-621-8070 and follow the automated operator's instructions. Please use your valuation request number for reference.

========== NHTSA Recall Notices (Continued) ==========

NHTSA ID: 03V094000 Issued: 03/07/2003 No. of vehicles: 3,674
Structure
certain pickup truck, van, and mini van conversions equipped with Southern Comfort built running boards that contain certain courtesy lights manufactured by American technology components, inc. These units contain a courtesy light or lights that might overheat when the wire harness is exposed to excessive moisture and road salt. This overheating condition can cause the running board to melt or cause a Fire.
Dealers will replace the wiring harness on these running boards. Owner notification began March 7, 2003. Owners who take their Vehicles to an authorized Dealer on an agreed upon service date and do not receive the free remedy within a reasonable time should contact Southern Comfort at 1-800-745-6096.

NHTSA ID: 02V239000 Issued: / /20 No. of vehicles: 80,250
Equipment:Other labels
certain 4X2 sport utility Vehicles fail to comply with the requirements of Federal motor Vehicle safety standard no. 120, "tire selection and rims for motor Vehicles other than passenger cars." the rear tire pressure is incorrectly listed on the label for 4.2 Vehicles.
Customers may inflate their rear tires based on the incorrect tire pressure information on the certification label.
A supplementary label will be sent to Customers to place near the certification label to identify the appropriate rear tire pressure. The Customer may also have the Dealer install the label on the Vehicle, if they so desire. Owner notification is expected to begin during September or October 2002. Owners who do not receive the free label and installation instructions within a reasonable time should contact Ford at 1-866-436-7332.

========== Appraisal and Valuation Notes ==========
The loss vehicle has been valued as a newer vehicle in the region with 21% more than average miles of 53,100.

The following options are not included in valuation: Overhead Console, Clearcoat Paint, Split Bench Seats
Included in our backup are similar models to the loss vehicle.
Proper adjustments were made for this valuation.
QuickCOM: CO=XZJT

Valuation request: 33619132 (continued) 2002 FORD EXPEDITION 4X2 XLT

Your valuation has been prepared in compliance with all local rules and regulations.

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Various aspects of our Market Report are covered by one or more pending patent applications.

The trade names and/or trademarks used herein are owned by their respective trademark owners.

Complete this form when file is closed. Date valued: 01/26/2005
Date of loss: 01/22/2005

SEND TO: CCC INFORMATION SERVICES INC.
ATTN: SETTLEMENT TRACKING
100 S. MAIN ST.
SIOUX FALLS, SD 57104
FAX: 1-800-621-7070

Settlement Data

Request number: [redacted]132
Insured: [redacted]
Claim reference: [redacted]

User id: 19032 Code: FA
Vehicle: 2002 FORD EXPEDITION 4X2 X
Adjuster: ANY41
Settl Adj: _____

	CCC Values		Settlement Values	
Base Valuation:	17175.00		_____	
Condition Adjustment Amount:	403.00	+	_____	
Additional Considerations:		(+)	_____	
Prior Damage:		(-)	_____	
Non-Factory Options:		(+)	_____	
Other Pre-Tax Adjustments:		(+/-)	_____	
Subtotal (ACV):	17578.00	+		
Tax:		(+)	_____	_____ %
Deductible:		(-)	_____	
Other Post-Tax Adjustments:		(+/-)	_____	
Owner Retained Salvage:		(-)	_____	
Adjusted CCC Amount:	17578.00	+		
Final Settlement Amount:			_____	

Settlement date: __/__/____ (mm/dd/yyyy)

Insured report date: __/__/____ (mm/dd/yyyy)

Claim Representative Settlement Notes:

EA85-885-LC-2279

==========: Vehicle Valuation / Settlement Report ==========

**Company Exchange (Farmers-1, TCM-5, MCA-6, Truck-8): 1 **Loss [redacted]

**Insured: [redacted] **Clm# [redacted] **Zip: [redacted]

**Claimant: **Pol# [redacted] **DOL: 01/22/2005

**Inspecting BCO#: _____ **Settling BCO#: _____

**VIN: 1FMRU15W02L[redacted] **Mileage: 63,991

Veh lic#: _____ Exp date: _____

**Year: 02 **Make: FORD

**Model: EXPEDITION 4X2 XLT

**Doors: 4D **Engine: 8-4.6L-FI **Fuel: Gas

VEHICLE CONDITIONING

Mechanical: NORMAL

Body/Glass: NORMAL

Paint: DLR READY

Interior: DLR READY

Tires: DLR READY

========== DATES REPORTED TO: ==========

Company	BCO	1st CR

ISO	Vendor	Settled

LTFT	/32	RTFT	/32
LTR	/32	RTR	/32
Spare	/32		

Brand: _____

**SUBROGATION YES__ NO__

========== OPTIONS ==========

AT-AUTOMATIC TRANSMISSION	OD-OVERDRIVE
PS-POWER STEERING	PB-POWER BRAKES
PW-POWER WINDOWS	PL-POWER LOCKS
SP-POWER DRIVER SEAT	PM-POWER MIRRORS
AC-AIR CONDITIONING	RD-REAR DEFOGGER
TW-TILT WHEEL	CC-CRUISE CONTROL
CS-CLOTH SEATS	DB-4-WHEEL DISC BRAKES
DM-DUAL MIRRORS	KE-KEYLESS ENTRY
3S-3RD SEAT	AM-AM RADIO
FM-FM RADIO	ST-STEREO
CA-CASSETTE	SE-SEARCH/SEEK
SK-CD CHANGER/STACKER	TQ-STEERING WHEEL TOUCH CONTROLS
RR-LUGGAGE/ROOF RACK	SB-REAR STEP BUMPER
MP-METALLIC PAINT	DT-PRIVACY GLASS
RU-RUNNING BOARDS/SIDE STEPS	AB-ANTI-LOCK BRAKES (4)
AG-AIR BAG	RG-PASSENGER AIR BAG
AW-ALUMINUM/ALLOY WHEELS	BM-BODY SIDE MOLDINGS
IW-INTERMITTENT WIPERS	MP-REAR WINDOW WIPER

========== Vehicle Valuation / Settlement Report ==========

**Company Exchange (Farmers-1, TCM-5, MCA-6, Truck-8): 1 Page: 2

**Insured: [redacted] **Clm#: [redacted] **Zip: [redacted]

**Claimant: **Pol#: [redacted] **DOL: 01/22/2005

SETTLEMENT DETAIL			SALVAGE		
**Valuation method used: CCC			Location of Salvage:	ORS	Pool
**CCC Request #: 33619132			Address: _____	Sale#	_____
**Valuation	$	17,175.00	_____	Stall#	_____
**Adjustments(+/-)	$	_____	_____		
**Actual cash value	$	_____	Salvage Bids		
Sales tax	$	_____	Buyer	Amount	Phone
License fee	$	_____	1. _____		
Transfer fee	$	_____	2. _____		
Loss of use	$	_____	3. _____		
Apparel/Luggage	$	_____	Advance Charges		Paid by CR
Deductible	$	_____	Tow _____		YES NO
Less salvage	$	_____	Storage _____		YES NO
Net total	$	_____	Other _____		YES NO

Distribution of Payments

Owner $ _____ Mortgages $ _____ Loss of Use $ _____

Explain Adjustments: _____

Claim Representative Signature _____ CR ID: ANY4

Supervisor Signature _____ Date _____

Note: All fields marked ** are required for DP input.

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MID-CENTURY INS. CO. OF TEXAS
FARMERS CLAIMS
C/O NATIONAL DOCUMENT CNTR.
PO BOX 268994
OKLAHOMA CITY, OK 73126-8994
(936)637-9992 FAX: (877)217-1389

ESTIMATE OF RECORD

WRITTEN BY: YOUNG,AARON 01/26/2005 11:02 AM
ADJUSTER: YOUNG,AARON (936)637-9992

INSURED: [redacted]
OWNER:
ADDRESS:
LUFKIN, TX [redacted]
DAY:
EVENING:

CLAIM [redacted]
POLICY
DATE OF LOSS: 01/22/2005 AT 09:30 AM
TYPE OF LOSS: COMPREHENSIVE
POINT OF IMPACT: 22. TOTAL BURN

INSPECT 1508 HELEN ST
LOCATION: LUFKIN, TX 75901

DAY: (936)637-0932
OTHER

REPAIR
FACILITY:

DAYS TO REPAIR
LICENSE #

2002 FORD EXPEDITION 4X2 XLT 8-4.6L-FI 4D UTV SILVER INT:GRAY
VIN: 1FMRU15W01LA40624 LIC: M12XSJ TX PROD DATE: 10/2001 ODOMETER: 63991

AIR CONDITIONING	REAR DEFOGGER	TILT WHEEL
CRUISE CONTROL	INTERMITTENT WIPERS	KEYLESS ENTRY
REAR WIPER	STEERING WHEEL CONTROLS	BODY SIDE MOLDINGS
DUAL MIRRORS	PRIVACY GLASS	ROOF CONSOLE
LUGGAGE/ROOF RACK	CLEAR COAT PAINT	METALLIC PAINT
POWER STEERING	POWER BRAKES	POWER WINDOWS
POWER LOCKS	POWER DRIVER SEAT	POWER MIRRORS
AM RADIO	FM RADIO	STEREO
CASSETTE	SEARCH/SEEK	CD CHANGER/STACKER
ANTI-LOCK BRAKES (4)	DRIVER AIR BAG	PASSENGER AIR BAG
4 WHEEL DISC BRAKES	CLOTH SEATS	SPLIT BENCH SEATS
3RD SEAT	REAR STEP BUMPER	RUNNING BOARDS/SIDE STEPS
AUTOMATIC TRANSMISSION	OVERDRIVE	ALUMINUM/ALLOY WHEELS

NO.	OP.	DESCRIPTION	QTY	EXT. PRICE	LABOR	PAINT
1		FRONT BUMPER				
2		C/H FRONT BUMPER			1.5	
3**	REPL	QUAL REPL PARTS BUMPER CHROME	1	263.00	INCL.	
4**	REPL	QUAL REPL PARTS RT BUMPER FILLER	1	9.20	INCL.	
5**	REPL	QUAL REPL PARTS LT BUMPER FILLER	1	9.20	INCL.	
6**	REPL	QUAL REPL PARTS PAD ASSY PRIMED	1	93.00	INCL.	1.5

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ESTIMATE OF RECORD
2002 FORD EXPEDITION 4X2 XLT 8-4.6L-FI 4D UTV SILVER INT:GRAY

NO.	OP.	DESCRIPTION	QTY	EXT. PRICE	LABOR	PAINT
7	REPL	VALANCE W/O FOG LAMPS & TOW HOOKS ARIZONA BEIGE	1	184.37	INCL.	
8	REPL	LICENSE BRACKET	1	15.02	0.2	
9		GRILLE				
10	REPL	GRILLE XLT CHROME	1	322.50	INCL.	
11	REPL	MOUNT PANEL CENTER BRACKET	1	42.08	0.2	
12**	REPL	QUAL REPL PARTS MOUNT PANEL	1	119.00	INCL.	
13	REPL	RT MOUNT PANEL LOWER BRACKET	1	7.97	0.1	
14	REPL	LT MOUNT PANEL LOWER BRACKET	1	7.13	0.1	
15	REPL	PANEL COVER	1	62.97	0.2	
16		FRONT LAMPS				
17*	REPL	QUAL RECY PARTS RT HEADLAMP ASSY +25%	1	125.00	INCL.*	
18		AIM HEADLAMPS			0.5	
19	REPL	LT HEADLAMP ASSY	1	140.36	INCL.	
20*	REPL	QUAL RECY PARTS RT PARK LAMP +25%	1	31.25	INCL.*	
21	REPL	LT PARK LAMP	1	41.82	INCL.	
22		COOLING				
23	REPL	RADIATOR SUPPORT	1	208.73	S 7.5	1.5
24		ADD FOR AC OPTION			M 0.5 M	
25		ADD FOR AUTO TRANS			M 0.2 M	
26	REPL	AIR DEFLECTOR UPPER	1	49.70	INCL.	
27*	REPL	QUAL RECY PARTS RADIATOR ASSY ALL +25%	1	312.50	MINCL.* M	
28		ADD FOR AUTO TRANS			M 0.2 M	
29	REPL	FAN SHROUD FROM 9/8/97	1	96.28	INCL.	
30	REPL	RESERVOIR	1	60.45	M 0.4 M	
31**	REPL	QUAL REPL PARTS RESERVOIR CAP	1	5.87		
32**	REPL	QUAL REPL PARTS UPPER HOSE	1	17.09	M 0.4 M	
33		DEDUCT FOR OVERLAP			-0.2 M	
34		DEDUCT FOR OVERLAP			-0.2 M	
35	REPL	LOWER HOSE	1	66.02	M 0.5 M	
36		DEDUCT FOR OVERLAP			-0.2 M	
37	REPL	FAN BLADE 11 BLADES	1	57.75	M 1.0 M	
38*	REPL	QUAL RECY PARTS FAN CLUTCH W/AC +25%	1	18.75	MINCL.* M	
39	REPL	IDLER PULLEY	1	17.50	M 0.3 M	
40	REPL	BELT TENSIONER W/AC	1	51.70	M 0.4 M	
41	REPL	WATER PUMP ASSY	1	144.24	M 1.5 M	
42**	REPL	QUAL REPL PARTS GASKET	1	3.66		
43	REPL	PULLEY	1	18.87	MINCL. M	
44	REPL	TRANS COOLER FROM 12/1/99	1	117.45	M 0.8 M	

45	REPL	P/S COOLER	1	42.97	M	0.8	M
46		AIR CONDITIONER & HEATER					
47*	REPL	QUAL RECY PARTS CONDENSER +25%	1	187.50		INCL.*	M
48	REPL	RT CONDENSER MOUNT BRACKET	1	10.17			
49	REPL	LT CONDENSER MOUNT BRACKET	1	10.17			

ESTIMATE OF RECORD
2002 FORD EXPEDITION 4X2 XLT 8-4.6L-FI 4D UTV SILVER INT:GRAY

NO.	OP.	DESCRIPTION	QTY	EXT. PRICE	LABOR		PAINT
50	REPL	RT CONDENSER INSULATOR	1	6.95			
51	REPL	LT CONDENSER INSULATOR	1	6.95			
52	REPL	RT CONDENSER SEAL ALL	1	7.25			
53	REPL	LT CONDENSER SEAL ALL	1	7.25			
54*	REPL	QUAL RECY PARTS DEHYDRATOR FROM 3/17/97 +25%	1	187.50	M	0.4*	M
55*	REPL	QUAL RECY PARTS COMPRESSOR +25%	1	250.00	M	1.2*	M
56	REPL	CLUTCH	1	24.54	M	1.0	M
57	REPL	PULLEY	1	54.58		INCL.	M
58	REPL	COIL	1	45.92		INCL.	M
59	REPL	HOSE & TUBE ASSY W/O REAR AC FROM 3/97	1	195.44		INCL.	M
60	REPL	AC TUBE EVAPORATOR TO DEHYDRATOR W/O REAR AC	1	65.20		INCL.	M
61		DEDUCT FOR OVERLAP				-0.2	M
62		HOOD					
63**	REPL	QUAL REPL PARTS CAPA HOOD	1	280.00		1.0	3.0
64		ADD FOR CLEAR COAT					1.2
65		ADD FOR UNDERSIDE(COMPLETE)					1.5
66	REPL	INSULATOR	1	79.88			
67	REPL	RT HINGE	1	30.38		0.3	0.3
68	REPL	LT HINGE	1	30.97		0.3	0.3
69	REPL	LATCH	1	31.17		INCL.	
70	REPL	UNDER HOOD LAMP	1	10.68		INCL.	
71	REPL	BULB	1	1.51			
72	REPL	RELEASE CABLE	1	32.55		0.8	
73	REPL	RELEASE HANDLE BLACK	1	33.23			
74	REPL	STRIKER	1	15.92		INCL.	
75	REPL	REAR SEAL	1	27.03		INCL.	
76	REPL	RT BUMPER ON RADIATOR SUPPORT	1	7.13			
77	REPL	LT BUMPER ON RADIATOR SUPPORT	1	7.13			
78	REPL	RT BUMPER ON HOOD	1	2.99			
79	REPL	LT BUMPER ON HOOD	1	2.99			
80	REPL	DEFLECTOR WRAPAROUND	1	77.90		0.5	
81		FENDER					
82	REPL	RT FENDER W/O WHEEL LIP W/O ANTENNA	1	288.65		2.4	2.2

83		OVERLAP MAJOR ADJ. PANEL				-0.4
84		ADD FOR CLEAR COAT				0.4
85		ADD FOR EDGING				0.5
86		DEDUCT FOR OVERLAP			-0.5	
87**	REPL	QUAL REPL PARTS CAPA LT FENDER W/O WHEEL LIP W/O ANTENNA	1	134.00	2.4	2.2
88		OVERLAP MAJOR ADJ. PANEL				-0.4
89		ADD FOR CLEAR COAT				0.4
90		ADD FOR EDGING				0.5
91		DEDUCT FOR OVERLAP			-0.5	

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ESTIMATE OF RECORD
2002 FORD EXPEDITION 4X2 XLT 8-4.6L-FI 4D UTV SILVER INT:GRAY

NO.	OP.	DESCRIPTION	QTY	EXT. PRICE	LABOR	PAINT
92	REPL	RT FENDER LINER	1	35.40	INCL.	
93	REPL	LT FENDER LINER	1	76.32	INCL.	
94#	REPL	WHEELS AMERICA 888 434 9746	2	270.00		
95		ELECTRICAL				
96	REPL	BATTERY 750 AMP	1	79.95	MINCL.	M
97	REPL	HOLD DOWN CLAMP	1	2.92		
98	REPL	BATTERY TRAY	1	13.00	MINCL.	M
99	REPL	HEAT SHIELD	1	22.00		
100	REPL	CABLE ASSY 2WD	1	74.42	M 1.5	M
101*	REPL	QUAL RECY PARTS ALTERNATOR FROM 6/27/98 +25%	1	62.50	M 0.9*	M
102	REPL	ALTERNATOR MOUNT BRACKET 4.6 LITER	1	13.13		
103	REPL	PULLEY	1	21.80		
104**	REPL	QUAL REPL PARTS REGULATOR	1	56.16		
105*	REPL	QUAL RECY PARTS STARTER +25%	1	37.50	M 0.9*	M
106	REPL	IGNITION COIL ALL	1	105.91	M 0.5	M
107*	REPL	QUAL RECY PARTS CONTROL MODULE 4.6 LITER +25%	1	156.25	M 0.8*	M
108		ENGINE				
M 109#	REPL	ENGINE 4.6L +25%	1	1250.00	12.0	M
110	REPL	AIR CLEANER ASSY	1	279.05	M 0.4	M
111	REPL	AIR MASS SENSOR	1	154.20	M 0.4	M
112	REPL	INLET TUBE	1	29.75	M 0.4	M
113	REPL	OUTLET TUBE	1	76.40	M 0.4	M
114**	REPL	QUAL REPL PARTS AIR TEMP SENSOR	1	18.36	M 0.3	M
115		WINDSHIELD				
116	REPL	WINDSHIELD FORD	1	231.30	2.2	
117	REPL	WINDSHIELD URETHANE KIT	1	5.93		
118	REPL	RT GLASS STOP	1	5.57		
119	REPL	LT GLASS STOP	1	5.57		
120	REPL	WEATHERSTRIP	1	18.77	INCL.	

121	REPL	MIRROR INSIDE MANUAL DAY & NIGHT	1	24.72	INCL.
122	REPL	RT WIPER ARM	1	20.92	INCL.
123	REPL	LT WIPER ARM	1	20.92	INCL.
124	REPL	RT WIPER BLADE FROM 10/97	1	12.57	0.1
125	REPL	LT WIPER BLADE FROM 10/97	1	12.57	0.1
126*	REPL	QUAL RECY PARTS MOTOR & LINKAGE +25%	1	25.00	
127		COWL			
128	REPL	RT VENT PANEL	1	63.25	INCL.
129	REPL	LT VENT PANEL	1	63.25	INCL.
130	REPL	COWL TOP PANEL OUTER	1	121.02	10.0
131	REPL	COWL TOP PANEL INNER	1	131.08	10.0
132	REPL	RT SIDE PANEL	1	96.62	2.5
133	REPL	DASH PANEL	1	269.57	

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ESTIMATE OF RECORD
2002 FORD EXPEDITION 4X2 XLT 8-4.6L-FI 4D UTV SILVER INT:GRAY

NO.	OP.	DESCRIPTION	QTY	EXT. PRICE	LABOR	PAINT
134	REPL	LT SIDE PANEL	1	114.68	2.5	
135		INSTRUMENT PANEL				
136*	REPL	QUAL RECY PARTS INSTRUMENT PANEL MEDIUM GRAPHITE +25%	1	437.50	6.5*	
137		RESTRAINT SYSTEMS				
138	REPL	CONTROL MODULE W/SENSOR W/O SIDE AIR BAG	1	193.10	M 1.3	M
139	REPL	CLOCKSPRING W/CRUISE CONTROL	1	79.89	M 1.0	M
		SUBTOTALS ==>		9707.75	80.5	14.7

LINE 17 : SUPPLIERS PART DESCRIPTION: RT H/LAMP ASSY AGRD
LINE 20 : SUPPLIERS PART DESCRIPTION: RT PARK LAMP ,PARKLAMP/TURN SIGNAL (OUTER HEADLAMP M
LINE 27 : SUPPLIERS PART DESCRIPTION: RADIATOR 4X2,5.4L AOD,8-330 (5.4L) IN YLIH-CA
LINE 38 : SUPPLIERS PART DESCRIPTION: FAN CLUTCH 4.6,W/AC
LINE 47 : SUPPLIERS PART DESCRIPTION: A/C CONDENSER 4X2,5.4L AOD
LINE 54 : SUPPLIERS PART DESCRIPTION: A/C CONDENSER 4X2,5.4L AOD
LINE 55 : SUPPLIERS PART DESCRIPTION: A/C COMPRESSOR 4.6, WITH DUAL AC
LINE 101: SUPPLIERS PART DESCRIPTION: ALTERNATOR
LINE 105: SUPPLIERS PART DESCRIPTION: STARTER 4.6
LINE 107: SUPPLIERS PART DESCRIPTION: ELEC CONT UNIT (ECM) (R ENGINE COMPART
LINE 109: ENGINE PRICE AVAILABLE BY CALLING LONESTAR AUTO SALVAGE 936 6321981.
LINE 126: SUPPLIERS PART DESCRIPTION: (MOTOR/LINKAGE)

PARTS 9707.75

BODY LABOR	50.9 HRS	@$ 40.00/HR	2036.00
PAINT LABOR	14.7 HRS	@$ 40.00/HR	588.00
MECHANICAL LABOR	29.6 HRS	@$ 55.00/HR	1628.00
PAINT SUPPLIES			400.00
SUBTOTAL			$14359.75
SALES TAX	$10107.75	@ 8.2500%	833.89
TOTAL COST OF REPAIRS			$15193.64
ADJUSTMENTS:			
DEDUCTIBLE			500.00
TOTAL ADJUSTMENTS			$ 500.00
NET COST OF REPAIRS			$14693.64

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ESTIMATE OF RECORD
2002 FORD EXPEDITION 4X2 XLT 8-4.6L-FI 4D UTV SILVER INT:GRAY

THIS IS NOT AN AUTHORIZATION TO REPAIR. MOREOVER, WE MUST INSPECT AND APPROVE ANY AND ALL SUPPLEMENTARY DAMAGES PRIOR TO REPAIR. IF, AFTER WE HAVE AUTHORIZED REPAIR, YOU FAIL TO PRESENT THIS ESTIMATE TO THE REPAIR FACILITY PRIOR TO THE START OF REPAIRS, YOU MAY INCUR ADDITIONAL EXPENSE.

IF THE ABOVE ESTIMATE INCLUDES A NAPA PART PRICE, THE REPAIR FACILITY MUST COMPLETE A ONE TIME SET UP WITH THEIR LOCAL NAPA RETAILER IN ORDER TO RECEIVE THE SPECIAL FARMERS PREFERRED PARTS PROGRAM PRICING. TO ACCOMPLISH SET UP, CONTACT YOUR LOCAL NAPA RETAILER AND ASK THEM TO INSERT BILLING CODE NUMBER 9066 INTO YOUR CUSTOMER BILLING PROFILE. THE 9066 CODE WILL ENABLE YOUR REPAIR FACILITY TO RECEIVE SPECIAL PRICING ON ALL NAPA PARTS AND/OR SUPPLIES PURCHASED. IF YOU DO NOT ALREADY HAVE A LOCAL NAPA RETAILER ACCOUNT, PLEASE CALL 1-800-LET-NAPA FOR YOUR NEAREST NAPA LOCATION.

THIS ESTIMATE WAS AGREED TO AND ACCEPTED BY:

SHOP MANAGERS SIGNATURE_____

ADJUSTER'S SIGNATURE_____

DAYS TO REPAIR:_____

ESTIMATE CALCULATED USING A PRESET USER THRESHOLD AMOUNT FOR THE PAINT AND MATERIAL COST.

RECYCLED PART COSTS BASED ON INFORMATION PROVIDED BY CAR-PART.COM. FOR ASSISTANCE, CALL CCC AT 800-637-8511.

01/26/2005 AT 11:02 AM 1006053433-1-1
60063

ESTIMATE OF RECORD
2002 FORD EXPEDITION 4X2 XLT 8-4.6L-FI 4D UTV SILVER INT:GRAY

ESTIMATE BASED ON MOTOR CRASH ESTIMATING GUIDE. UNLESS OTHERWISE NOTED ALL ITEMS ARE DERIVED FROM THE GUIDE DR2MC97 DATABASE DATE 01/2005, CCC DATA DATE 01/2005, AND THE PARTS SELECTED ARE OEM-PARTS MANUFACTURED BY THE VEHICLES ORIGINAL EQUIPMENT MANUFACTURER. OEM PARTS ARE AVAILABLE AT OE/VEHICLE DEALERSHIPS. ASTERISK (*) OR DOUBLE ASTERISK (**) INDICATES THAT THE PARTS AND/OR LABOR INFORMATION PROVIDED BY MOTOR MAY HAVE BEEN MODIFIED OR MAY HAVE COME FROM AN ALTERNATE DATA SOURCE. TILDE SIGN (~) ITEMS INDICATE MOTOR NOT-INCLUDED LABOR OPERATIONS. NON-ORIGINAL EQUIPMENT MANUFACTURER AFTERMARKET PARTS ARE DESCRIBED AS AM, QUAL REPL PARTS OR COMP REPL PARTS WHICH STANDS FOR COMPETITIVE REPLACEMENT PARTS. USED PARTS ARE DESCRIBED AS LKQ, QUAL RECY PARTS, RCY, OR USED. RECONDITIONED PARTS ARE DESCRIBED AS RECON. RECORED PARTS ARE DESCRIBED AS RECORE. NAGS PART NUMBERS AND PRICES ARE PROVIDED BY NATIONAL AUTO GLASS SPECIFICATIONS, INC. POUND SIGN (#) ITEMS INDICATE MANUAL ENTRIES. SOME PARTS THAT ARE DESCRIBED AS RECON. MAY BE OE SURPLUS PARTS OR OTHER OE PARTS OFFERED AT A SPECIAL PRICING DISCOUNT. FOR FURTHER CLARIFICATION PLEASE REVIEW THE SUPPLIERS LIST ATTACHED TO THIS ESTIMATE, OR CONSULT THE APPRAISER OR ESTIMATOR.

CCC PATHWAYS - A PRODUCT OF CCC INFORMATION SERVICES INC.

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ESTIMATE OF RECORD
2002 FORD EXPEDITION 4X2 XLT 8-4.6L-FI 4D UTV SILVER INT:GRAY

RECYCLED PART SUPPLIERS

LINE	LINE DESCRIPTION		PRICE
38	QUAL RECY PARTS FAN CLUTC +25%	STOCK NO.: R441	$ 18.75
105	QUAL RECY PARTS STARTER +25%	STOCK NO.: R441	$ 37.50
126	QUAL RECY PARTS MOTOR & L +25%	STOCK NO.: S147	$ 25.00
	LONE STAR AUTO SALVAGE - KOLT 4115 HWY. 59 NORTH LUFKIN, TX 75904	(888)263-0801 RICHARD LAMBING	
101	QUAL RECY PARTS ALTERNATO +25%	STOCK NO.: 4D7871	$ 62.50
	PRP - HI-WAY AUTO PARTS - KOLT 11315 HWY 64 WEST	(800)482-8286 CRAIG BARKER	

TYLER, TX 75704

55	QUAL RECY PARTS COMPRESSO +25%	STOCK NO.: 3732	$ 250.00
136	QUAL RECY PARTS INSTRUMEN +25%	STOCK NO.: 4497	$ 437.50

AIRLINE USED AUTO PARTS - QRP (800)989-0090
10616 AIRLINE DR. PETER NGUYEN
HOUSTON, TX 77037

20	QUAL RECY PARTS RT PARK L +25%	STOCK NO.: 031779	$ 31.25

AAA IMPORTS, INC. - FOREIGN AN (800)949-1265
13915 BELLAIRE BLVD. ANDY NGUYEN
HOUSTON, TX 77083

107	QUAL RECY PARTS CONTROL M +25%	STOCK NO.: 14028	$ 156.25

BELTWAY USED PARTS - KOLT - QR (800)469-7656
13106 OLD BEAMONT HWY. 90 EAST LEROY
HOUSTON, TX 77049

17	QUAL RECY PARTS RT HEADLA +25%	STOCK NO.: 120302	$ 125.00

GLENN'S AUTO AND TRUCK PARTS (800)532-0675
3933 PINE MONT TIM STRAMEY
HOUSTON, TX 77018

27	QUAL RECY PARTS RADIATOR +25%	STOCK NO.: 022445	$ 312.50
47	QUAL RECY PARTS CONDENSER +25%	STOCK NO.: 022445	$ 187.50

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ESTIMATE OF RECORD
2002 FORD EXPEDITION 4X2 XLT 8-4.6L-FI 4D UTY SILVER INT:GRAY

RECYCLED PART SUPPLIERS

LINE	LINE DESCRIPTION		PRICE
54	QUAL RECY PARTS DEHYDRATO +25%	STOCK NO.: 022445	$ 187.50

MANUEL'S USED AUTO PARTS #2 (800)778-5071
10529 AIRLINE DRIVE DALE COUCH
HOUSTON, TX 77037

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ESTIMATE OF RECORD
2002 FORD EXPEDITION 4X2 XLT 8-4.6L-FI 4D UTV SILVER INT:GRAY

ALTERNATE PARTS SUPPLIERS

3	QUAL REPL PARTS BUMPER CHRO	PART NO.	F01002356	PRICE	263.00
12	QUAL REPL PARTS MOUNT PANEL	PART NO.	F01320224	PRICE	119.00

KEYSTONE AUTO - FRPP (800)783-0473

940 INDUSTRY DRIVE, SUITE 1B KENNER, LA 70062	(504)466-0473
KEYSTONE AUTO - FPPP 2637 OAKLAND ST. GARLAND, TX 75041	(800)822-0866 (972)271-2714
KEYSTONE AUTO - FPPP 5001 WEST RENO, STE H OKLAHOMA CITY, OK 73127	(866)374-4010 (405)946-4133
KEYSTONE AUTO - FPPP 1449 W. SKYLINE OZARK, MO 65721	(417)582-1995 (877)455-1995
KEYSTONE AUTO - FPPP 2721 DESIARD STREET MONROE, LA 71201	(800)210-9919 (318)340-0400
KEYSTONE AUTO - FPPP 11614 RICHCROFT AVE. BATON ROUGE, LA 70814	(888)273-6441 (225)273-6444
KEYSTONE AUTO - FPPP 11011 BLUFF BEND DRIVE AUSTIN, TX 78753	(800)580-8989 (512)339-3001
KEYSTONE AUTO - FPPP 7304 SAND STREET FT. WORTH, TX 76118	(888)522-8549 (817)590-4034
KEYSTONE AUTO - FPPP 5608 BUSINESS PARK DRIVE SAN ANTONIO, TX 78218	(800)580-8989 (210)666-1190
KEYSTONE AUTO - FPPP 4431 CANFINA DRIVE TYLER, TX 75708	(800)580-8989 (903)592-7606
KEYSTONE AUTO - FPPP 1721 TANCAHUA STREET CORPUS CHRISTI, TX 78401	(866)272-8901 (361)855-7121

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ESTIMATE OF RECORD
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ALTERNATE PARTS SUPPLIERS

KEYSTONE AUTO - FPPP (800)580-8989
4851 HOMESTEAD ROAD #148 (713)675-1662
HOUSTON, TX 77028

KEYSTONE AUTO - FPPP (866)247-5165
163 3-M ROAD (254)857-9517
LORENA, TX 76665

KEYSTONE AUTO - FPPP (877)569-9559
6203 PATTERSON ROAD (501)569-9559
LITTLE ROCK, AR 72209

KEYSTONE AUTO - FPPP (800)551-5610
502 E. 64TH ST. (806)745-7002
LUBBOCK, TX 79404

KEYSTONE AUTO - FPPP (800)622-8609
3691 SOUTH 73RD EAST AVE. (918)622-4550
TULSA, OK 74145

KEYSTONE AUTO - FPPP (888)545-6818
114 W. 2ND STREET (620)624-2041
LIBERAL, KS 67901

KEYSTONE AUTO - FPPP (814)451-5355
5129 MLK FREEWAY BLDG 6
FT. WORTH, TX 76119

6	QUAL REPL PARTS PAD ASSY PR	PART NO. FO1057282	PRICE	95.00
63	QUAL REPL PARTS CAPA HOOD	PART NO. FO1230170	PRICE	280.00
87	QUAL REPL PARTS CAPA LT FEN	PART NO. FO1240191	PRICE	134.00

ALLEN SAMUELS DODGE (800)888-2079
7740 NORTHEAST LOOP 820
FORT WORTH, TX 76180

4	QUAL REPL PARTS RT BUMPER F	PART NO. 2537 226	PRICE	9.20
5	QUAL REPL PARTS LT BUMPER F	PART NO. 2537 225	PRICE	9.20

WHOLESALE CRASH PARTS - FPPP (800)541-2682
3140 IRVING BLVD.
DALLAS, TX 75247

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ESTIMATE OF RECORD
2002 FORD EXPEDITION 4X2 XLT 8-4.6L-FI 4D UTV SILVER INT:GRAY

ALTERNATE PARTS SUPPLIERS

31	QUAL REPL PARTS RESERVOIR C	PART NO.	BK 7032468	PRICE	5.87
32	QUAL REPL PARTS UPPER HOSE	PART NO.	NHH8935	PRICE	17.09
42	QUAL REPL PARTS GASKET	PART NO.	NGAK31309	PRICE	3.66
104	QUAL REPL PARTS REGULATOR	PART NO.	ECHVR443	PRICE	56.16
114	QUAL REPL PARTS AIR TEMP SE	PART NO.	ECHTS4039	PRICE	18.36

NAPA - FPPP (800)LET-NAPA
2999 CIRCLE 75 PARKWAY
ATLANTA, GA 30339

E005-005-LC-2294

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ESTIMATE OF RECORD
2002 FORD EXPEDITION 4X2 XLT 8-4.6L-FI 4D UTV SILVER INT:GRAY

ALTERNATE PARTS USAGE

AFTERMARKET PARTS

AFTERMARKET SELECTION METHOD: AUTOMATICALLY LIST

NO. OF TIMES USER WAS NOTIFIED THAT AN AFTERMARKET PART WAS AVAILABLE: 17

NO. OF AFTERMARKET PARTS THAT APPEAR IN THE FINAL ESTIMATE: 12

RECYCLED PARTS

NO. OF TIMES USER WAS NOTIFIED THAT A RECYCLED PART WAS AVAILABLE: 18

NO. OF RECYCLED PARTS THAT APPEAR IN THE FINAL ESTIMATE: 12

To: NATIONAL DOCUMENT CLAIMS CENTER
P.O. BOX 268994
OKLAHOMA CITY, OK 73126-8994
FAX (877) 217-1389
CLAIMSDOCUMENTS@FARMERSINSURANCE.COM

Instructions: PLEASE ATTACH THE FOLLOWING DOCUMENT TO THE CLAIM FILE

SECTION 1: *(Fill out below)*

CLAIM/UNIT: [redacted] # OF PAGES: 3

SENDER: Aaron Young

DESCRIPTION: Lufkin Fire Dept. Rpt.

SECTION 2: *(Check One)*

LETTERS:

☐ Doc Type: General
Sub Type: Contact Letter

☐ Doc Type: General
Sub Type: Denial Letters

☐ Doc Type: General
Sub Type: Closure Letter

☐ Doc Type: General
Sub Type: Request for Information

☐ Doc Type: General
Sub Type: Reservation of Rights

☐ Doc Type: General
Sub Type: Status Letter

ESTIMATES and BILLS:

☐ Doc Type: Auto Total Loss
Sub Type: Evaluation

☐ Doc Type: Estimates
Sub Type: Auto Estimate

☐ Doc Type: Estimates
Sub Type: Boat Estimate

☐ Doc Type: Estimates
Sub Type: Personal Property Estimate

☐ Doc Type: Estimates
Sub Type: Structure Estimate

☐ Doc Type: Invoice Property
Sub Type: Hotel Bill

OTHER:

☐ Doc Type: Auto
☐ Sub Type: Salvage Title Notice
☐ Sub Type: Salvage Pool Documents

☐ Doc Type: Auto Invoice
Sub Type: Other

☐ Doc Type: Invoice Property
Sub Type: Contractors Invoice

☐ Doc Type: Independent Adjuster
Sub Type: Misc. Paperwork

☐ Doc Type: ISO Form or Report
☐ Sub Type: Property Ins Loss Register
☐ Sub Type: National Ins. Crime Bureau

☒ Doc Type: Legal
☐ Sub Type: Attorney Rep Advise to Customer
☐ Sub Type: Legal Supporting Documents

☐ Doc Type: Medical
Sub Type: Medical Bills or Services

☐ Doc Type: Receipt
☐ Sub Type: Personal Property Receipt
☐ Sub Type: Automobile Related Receipt
☐ Sub Type: Other

☐ Doc Type: Special Investigation
☐ Sub Type: Index Inquiry Form
☐ Sub Type: Cause and Origin Report

☐ Doc Type: Statements
Sub Type: Statement Resume

☐ Doc Type: Other

A

FDID *	State *	MM	DD	YYYY	Station	Incident Number *	Exposure *
AC608	TX	01	22	2005	6	05-0000074	000

☐ Delete ☐ Change ☐ No Activity

NFIRS -1 Basic

B Location*

☐ Check this box to indicate that the address for this incident is provided on the Wildland Fire Module in Section E "Alternative Location Specification". Use only for Wildland fires.

Census Tract ____ - ____

☒ Street address
☐ Intersection
☐ In Front of
☐ Rear of
☐ Adjacent to
☐ Directions

[redacted] Number/Milepost Prefix Street or Highway | Street Type | Suffix

Apt./Suite/Room | Lufkin City | TX State | [redacted] Zip Code

Cross street or directions, as applicable

C Incident Type *

131 | Passenger vehicle fire
Incident Type

D Aid Given or Received*

1 ☐ Mutual aid received
2 ☐ Automatic aid recv.
3 ☐ Mutual aid given
4 ☐ Automatic aid given
5 ☐ Other aid given
N ☒ None

Their FDID | Their State
Their Incident Number

E1 Date & Times

Midnight is 0000

check boxes if dates are the same as Alarm date.		Month	Day	Year	Hr Min Sec
	Alarm * (ALARM always required)	01	22	2005	09:38:00
☒	Arrival * (ARRIVAL required, unless cancelled or did not arrive)	01	22	2005	09:41:00
☒	Controlled (CONTROLLED optional, except for wildland fires)	01	22	2005	09:42:00
☒	Last Unit Cleared (LAST UNIT CLEARED, required except for wildland fires)	01	22	2005	10:00:00

E2 Shift & Alarms

Local option

B | 01 | 6
Shift or Platoon | Alarms | District

E3 Special Studies

Local option

Special Study ID | Special Study Value

F Actions Taken*

11 | Extinguish
Primary Action Taken (1)

Additional Action Taken (2)

Additional Action Taken (3)

G1 Resources*

☒ Check this box and skip this section if an Apparatus or Personnel form is used.

	Apparatus	Personnel
Suppression	0004	0006
EMS		
Other		

☐ Check box if resource counts include aid received resources.

G2 Estimated Dollar Losses & Values

LOSSES: Required for all fires if known. Optional for mob fires.

		None
Property $	024,000	☐
Contents $	000,000	☐

PRE-INCIDENT VALUE: Optional

Property $	000,000	☐
Contents $	000,000	☐

Completed Modules

☒ Fire-2
☐ Structure-3
☐ Civil Fire Cas.-4
☐ Fire Serv. Cas.-5
☐ EMS-6
☐ HazMat-7
☐ Wildland Fire-8
☒ Apparatus-9
☒ Personnel-10
☐ Arson-11

H1 Casualties ☒ None

	Deaths	Injuries
Fire Service		
Civilian		

H2 Detector

Required for Confined Fires.

1 ☐ Detectors alerted occupants
2 ☐ Detectors did not alert them
0 ☐ Unknown

H3 Hazardous Materials Release

N ☐ None
1 ☐ Natural Gas: (slow leak, no evacuation or HazMat action)
2 ☐ Propane Gas: (or LP, tank fire in home or yard)
3 ☐ Gasoline: (engine fuel leak or portable container)
4 ☐ Kerosene: (heat heater equipment or portable storage)
5 ☐ Diesel fuel/Fuel Oil: (vehicle fuel tank or portable)
6 ☐ Household solvents: (household spill, cleanup only)
7 ☐ Motor oil: (from engine or portable container)
8 ☐ Paint: (from paint cans totaling < 55 gallons)
9 ☐ Other: (special checklist attached required if spill > 55 gal., Minor complete the Checklist Form)

I Mixed Use Property

NN	☐ Not Mixed
10	☐ Assembly use
20	☐ Education use
33	☐ Medical use
40	☐ Residential use
51	☐ Row of stores
53	☐ Enclosed mall
58	☐ Bus. & Residential
59	☐ Office use
60	☐ Industrial use
63	☐ Military use
65	☐ Farm use
00	☐ Other mixed use

J Property Use* Structures

131	Church, place of worship	341	Clinic, clinic type infirmary	539	Household goods, sales, repair
161	Restaurant or cafeteria	342	Doctor/dentist office	579	Motor vehicle/boat sales/repair
162	Bar/Tavern or nightclub	361	Prison or jail, not juvenile	571	Gas or service station
213	Elementary school or kindergarten	419	1-or 2-family dwelling	599	Business office
215	High school or junior high	429	Multi-family dwelling	615	Electric generating plant
241	College, adult education	439	Rooming/boarding house	629	Laboratory/science lab
311	Care facility for the aged	449	Commercial hotel or motel	700	Manufacturing plant
331	Hospital	459	Residential, board and care	819	Livestock/poultry storage (barn)
		464	Dormitory/barracks	882	Non-residential parking garage
		519	Food and beverage sales	891	Warehouse

Outside

124	Playground or park	936	Vacant lot	981	Construction site
655	Crops or orchard	938	Graded/cared for plot of land	984	Industrial plant yard
669	Forest (timberland)	946	Lake, river, stream		
807	Outdoor storage area	951	Railroad right of way		
919	Dump or sanitary landfill	960	Other street		
931	Open land or field	961	Highway/divided highway		
		962	Residential street/driveway		

Lookup and enter a Property Use code only if you have NOT checked a Property Use box:

Property Use | 000

Property Use, Other

NFIRS-1 Revision 03/11/99

10060534331-1-1

FR05-005-LC-2298

K1 Person/Entity Involved
Local Option

Business Name (If Applicable) | Area Code - Phone Number

☐ Check this box if same address as Incident Location. Then skip the three duplicate address lines.

Mr., Ms., Mrs. | First Name | MI | Last Name | Suffix

Number | Prefix | Street or Highway | Street Type | Suffix

Post Office Box | Apt./Suite/Room | City

State | Zip Code -

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

K2 Owner
Local Option

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

Business Name (If Applicable) | [redacted] Area Code Phone Number

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

Mr., Ms., Mrs. | [redacted] First Name | MI | Last Name | Suffix

[redacted] Number | Prefix | Street or Highway | Street Type | Suffix

Post Office Box | Apt./Suite/Room | Lufkin City

TX State | [redacted] Zip Code -

L Remarks
Local Option

RESPONDED TO CAR FIRE [redacted] ARRIVED ON SCENE TO FIND FIRE HAD BEEN EXTINGUISHED BY RESCUE AND ENGINE 1. WHEN RESCUE ARRIVED A NEIGHBOR WAS EXTINGUISHING FIRE WITH DRY CHEM EXTINGUISHER. RESCUE ALSO USED DRY CHEM EXTINGUISHER TO EXTINGUISH FIRE. FIRE HAD BURNED THROUGH THE HOOD OF VEHICLE.

L Authorization

Officer in charge ID	Signature	Position or rank	Assignment	Month	Day	Year
110134	Turner, Duane	CAPTAIN		01	22	2005

Check Box if same as Officer in charge.

Member making report ID	Signature	Position or rank	Assignment	Month	Day	Year
110134	Turner, Duane	CAPTAIN		01	22	2005

1006053433-1-1

ER05-005-LC-2298

A

Form ★	State ★	MM	DD	YYYY	Station	Incident Number ★	Exposure ★	
AC608	TX	01	22	2005	6	05-0000074	000	☐ Delete ☐ Change ☐ No Activity

NFIRS -2 Fire

B Property Details

B1 ____ ☒ Not Residential
Estimated Number of residential living units in building of origin whether or not all units became involved

B2 ____ ☒ Buildings not involved
Number of buildings involved

B3 ____ ☒ None
Acres burned (outside fires) ☐ Less than one acre

C On-Site Materials or Products ☒ None

Complete if there were any significant amounts of commercial, industrial, energy or agricultural products or materials on the Property, whether or not they became involved

Enter up to three codes. Check one or more boxes for each code entered.

NNN | None
On-site material (1)
1 ☐ Bulk storage or warehousing
2 ☐ Processing or manufacturing
3 ☐ Packaged goods for sale
4 ☐ Repair or service

____ | ____
On-site material (2)
1 ☐ Bulk storage or warehousing
2 ☐ Processing or manufacturing
3 ☐ Packaged goods for sale
4 ☐ Repair or service

____ | ____
On-site material (3)
1 ☐ Bulk storage or warehousing
2 ☐ Processing or manufacturing
3 ☐ Packaged goods for sale
4 ☐ Repair or service

D Ignition

D1 83 | Engine area, running
Area of fire origin ★

D2 UU | Undetermined
Heat source ★

D3 UU | Undetermined
Item first ignited ★ 1 ☐ Check Box if Fire Spread was confined to object of origin

D4 ____ | ____
Type of material first ignited — Required only if Item First Ignited code is 00 or <70

E1 Cause of Ignition

☐ Check box if this is an exposure report. Skip to section G

1 ☐ Intentional
2 ☐ Unintentional
3 ☒ Failure of equipment or heat source
4 ☐ Act of nature
5 ☐ Cause under investigation
U ☐ Cause undetermined after investigation

E2 Factors Contributing To Ignition ☒ None

UU | Undetermined
Factor Contributing To Ignition (1)

____ | ____
Factor Contributing To Ignition (2)

E3 Human Factors Contributing To Ignition

Check all applicable boxes ☐ None

1 ☐ Asleep
2 ☐ Possibly impaired by alcohol or drugs
3 ☐ Unattended person
4 ☐ Possibly mental disabled
5 ☐ Physically disabled
6 ☐ Multiple persons involved
7 ☐ Age was a factor

Estimated age of person involved ____

1 ☐ Male 2 ☐ Female

F1 Equipment Involved In Ignition

☐ None If Equipment was not involved, Skip to Section G

____ | ____
Equipment Involved

Brand ____

Model ____

Serial # ____

Year ____

F2 Equipment Power

____ | ____
Equipment Power Source

F3 Equipment Portability

1 ☐ Portable
2 ☐ Stationary

Portable equipment normally can be moved by one person, is designed to be use in multiple locations, and requires no tools to install.

G Fire Suppression Factors

Enter up to three codes. ☐ None

____ | ____
Fire suppression factor (1)

____ | ____
Fire suppression factor (2)

____ | ____
Fire suppression factor (3)

H1 Mobile Property Involved

☐ None

1 ☐ Not involved in ignition, but burned
2 ☐ Involved in ignition, but did not burn
3 ☒ Involved in ignition and burned

H2 Mobile Property Type & Make

11 | Passenger car.
Mobile property type

FO | Ford
Mobile property make

expedition
Mobile property model

L.P 2002 ~~2001~~
Year

[redacted] | TX | 1FMRU15W02[redacted]
License Plate Number — State — VIN number

Local Use

☐ Pre-Fire Plan Available

Some of the information presented in this report may be added upon reports from other Agencies

☐ Arson report attached
☐ Police report attached
☐ Coroner report attached
☐ Other reports attached

NFIRS-2 Revision 01/19/98

1006053433-1-1

EA05-005-LC-2308

H.W. "Hank" Bardenhagen

Houston (713)973-3714
Conroe (936) 295-0522
Toll Free 877-878-0622
FAX (936)295-3386

FACSIMILE TRANSMITTAL SHEET

TO: Aaron Young	FROM: H.W. "Hank" Bardenhagen
COMPANY: Farmers Insurance Group	DATE: FEBRUARY 16, 2005
FAX NUMBER: 936-632-1112	TOTAL NO. OF PAGES INCLUDING COVER: Four (4)
PHONE NUMBER: [redacted]	SENDER'S REFERENCE NUMBER: 1006053433-1-L
RE: [redacted]	AFL CASE NUMBER: 05109V

If you do not receive all of the pages, please call 936-295-0522.

NOTES/COMMENTS:

Complete report will follow via US Mail shortly.

P.O. BOX 1672
CONROE, TEXAS 77305

Case Number: *05109V*
Requested by: *FARMERS INSURANCE GROUP*
Prepared for: *Aaron Young*
Assured: [redacted]
Page 2 of 3

observed. The most severe burn damage observed was along the driver portion, firewall area. This was at the brake boost pump and master cylinder area. This investigator observed burn damage progressing outward, from the forward portion of the master cylinder.

As can be observed within the enclosed photographs, the brake pressure switch was observed severely burn damage with the wires unobserved. The compression area for the dividing portion was observed damaged and fallen downward, along the connection portion of the base of the switch and master cylinder. This investigator observed severe damage to the master cylinder and pressure switch area. This led this investigator to form an opinion; there was a failure of the switch.

The switch and master cylinder were tagged into evidence and wrapped into protective plastic and remained on the vehicle for further analysis by interested parties.

EXAMINERS OPINION

The above listed loss was caused by flames ignited within the engine compartment, driver side, at the master cylinder brake pressure switch.

EXAMINERS CONCLUSION

Based on the observations of the fire scene on the date of this examination, this investigator concludes the cause of the above captioned loss should be regarded as accidental.

This investigator found no evidence that tended or proved any intent to damage and/or destroy the

Case Number: *03189V*
Requested by: *FARMERS INSURANCE GROUP*
Prepared for: *Aaron Young*
Assured: [redacted]

vehicle at the above listed location. The conclusion should be reconsidered should evidence be found that tends or proves intent to damage and/or destroy the above listed vehicle.

The findings and opinions within this report are reflective of the fire scene examination, evidence examined and information obtained during the examination/investigation. The fire patterns and smoke spread corroborate and/or support the above listed findings and opinions. The photographs and diagrams are included for supportive documentation.

Submitted,

AFL

H. W. "Hank" Bardenhagen

HWB/mw

Date of Report:	*February 3, 2005*
Case Number:	*05109V*
Date of Loss:	*January 22, 2005*
Time of Loss:	*9:38 AM*
Requested by:	*FARMERS INSURANCE GROUP*
Prepared for:	*Aaron Texas*
Assured:	[redacted]
	Lufkin, Texas [redacted]
Claim Number:	[redacted]

VEHICLE DESCRIPTION

The vehicle examined was a five (5) door 2002 Ford Expedition, silver in color. The vehicle was examined at the above listed insured's residence and loss location, Lufkin, Texas. The vehicle was positioned within the driveway and approximately four (4) to five (5) feet from the edge of the dwelling, at the garage conversion.

VEHICLE EXAMINATION

The overall exterior view of the vehicle revealed a fire had occurred within the engine compartment, driver side. The fire progressed upward and outward, damaging the engine compartment hood and windshield area. The driver front tire was observed burned and deflated. Burn damage was observed most severe along the rear portion and interior area of the engine compartment.

This investigator examined the interior of the vehicle. No suspect burn damage was observed throughout the interior portions. Smoke and sooting was observed along the upper portions, progressing throughout the area. This was observed as the windshield had been fractured along the driver portion and smoke and sooting progressed inward, into the interior area.

An examination of the front engine compartment area revealed the most severe burn damage

RR VIEW

LT RR VIEW

RT RR View

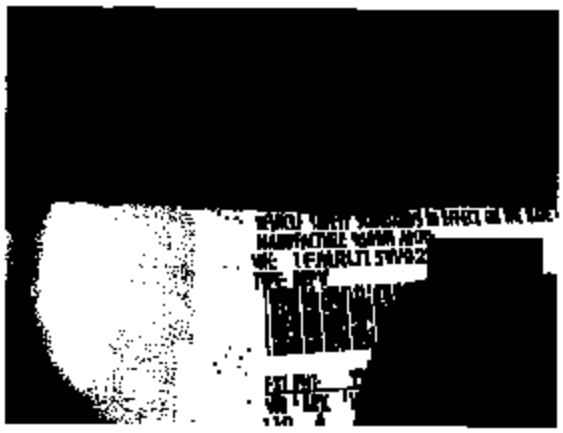
RT Side view

RT Front

Front engine

front end burn

engine burned



interior

seats

dash view

headliner

mi=63,991

Prior bumper damage

FARMERS

RETURN SERVICE REQUESTED

PRESORTED FIRST CLASS

$02.11

MAILED FROM ZIP CODE 78758

National Document Center
P.O. Box 268994
Oklahoma City, OK 73126-8994

First Class Mail

GONS AFFAIRS

Ford Motor Company
Attn: Shawn Norton
P.O. Box 6248 - Md-3ne-B
Dearborn, MI. 48126-2568

BRS-NDC-LC-2308

First Class Mail

EN05-005-LC-2210

[redacted]

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

PLAINTIFF: [redacted]

(Our File #301-1551)

2003A

49721

VS

DEFENDANT: Ford Motor Company

COMPLAINT FOR TORT OF NEGLIGENCE (PRODUCT LIABILITY)

STATEMENT OF FACTS

COUNT I

[redacted]

Fire Casualty Company (hereinafter referred to as "Plaintiff") files this Complaint for damages against Defendant Ford Motor Company, and respectfully shows the Court as follows;

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

2. Defendant designed, tested, manufactured, assembled, inspected, marketed, distributed and warranted a 1997 Ford F-150 XLT 2WD Short Bed Ext Cab, VIN: 1FTDX17W0VN[redacted] hereinafter "said product #1") prior to July 17, 2002.

3. [redacted] (hereinafter "Plaintiff's Insured #1) purchased said product in the stream of interstate commerce prior to July 17, 2002.

4. Thereafter, Plaintiff's Insured #1 used said product #1 for its intended purpose without abuse and without modification.

5. On or about July 17, 2002, a fire originated at the left rear upper level of the engine compartment of said product #1 due to a failed cruise control brake pressure switch (hereinafter "defective part #1).

6. As a result of the casualty described in the previous paragraph, said product #1, owned by Plaintiff's Insured #1, was

damaged in the amount of $11,316.50 (salvage is undetermined) and vinyl siding and contents located in said product #1 in the amount of $1,446.99.

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

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

9. As a result, Defendant is liable as tort feasor in the amount of $11,316.50 (salvage is undetermined) and for vinyl siding and contents located in said product #1 in the amount of $1,446.99 for damages caused by the defective part #1.

10. Plaintiff is subrogated to all rights and interest in the claim against Defendant as a result of making payments to Plaintiff's Insureds under a policy of insurance.

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

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

EN05-005-LC-2312

COUNT II

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

14. Defendant designed, tested, manufactured, assembled, inspected, marketed, distributed and warranted a 1997 Ford F-150 XLT 4WD Short Bed Ext Cab, VIN: 1FTDX1864VN[redacted] (hereinafter "said product #2") prior to January 9, 2003.

15. Cedric Cobb (hereinafter "Plaintiff's Insured #2) purchased said product #2 in the stream of interstate commerce prior to January 9, 2003.

16. Thereafter, Plaintiff's Insured #2 used said product #2 for its intended purpose without abuse and without modification.

17. On or about January 9, 2003, a fire originated at the location occupied by the brake pressure switch of said product #2 due to a failed cruise control brake pressure switch (hereinafter "defective part #2).

18. As a result of the casualty described in the previous paragraph, said product #2, owned by Plaintiff's Insured #2, was damaged in the amount of $12,560.00 (salvage is undetermined).

19. Subsequent investigation revealed that Defendant had negligently designed; negligently tested; negligently manufactured, negligently assembled; negligently inspected; negligently marketed; negligently distributed said product #2 in a defective condition at the time of first distribution and sale for use.

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

21. As a result, Defendant is liable as tort feasor in the

21. As a result, Defendant is liable as tort feasor in the amount of $12,560.00 (salvage is undetermined) for damages caused by the defective part #2.

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

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

23. Plaintiff shows that said defective part #1 & #2 in said product #1 & #2, which was designed, manufactured, distributed and sold by Defendant was in a defective condition at the time of the first distribution and sale for use. Plaintiff shows that the defective condition existing in this said product #1 & #2 included, but was not limited to:

a. A defective design of the defective part #1 & #2 installed in said product #1 & #2.

b. The failure to warn and to continue to warn users, purchasers and registered owners of such products, by letter, recall notice, or other reasonable means, of the dangerous characteristics and properties of the defective part #1 & #2 Defendant had a duty to exercise reasonable care to design, test, manufacture, assemble, inspect, market, and distribute safe products, so as to not subject purchasers or users or innocent third parties to an unreasonable risk of harm.

24. Defendant breached its duty to exercise reasonable care with respect to said product #1 & #2 and defective part #1 & #2.

25. Defendant was negligent and acted in a willful and wanton manner in designing, testing, and/or manufacturing, inspecting, marketing, distributing and selling the installed defective part #1 & #2 in such a manner and in such condition as to make said product #1 &

#2 inherently dangerous and defective.

26. Defendant's defective product #1 & #2 failed as a result of the negligence of Defendant described in Counts I & II so that Defendant's negligence was the proximate cause of the incident and resulting damages described above in the **STATEMENT OF FACTS** section of Plaintiff's complaint; and, said incident and said damages was reasonable perceivable by Defendant at all times relative to Plaintiff's complaint.

COUNT B: STRICT LIABILITY OF DEFENDANT

27. Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 26 as if fully set forth herein.

28. Defendant is strictly liable in tort to Plaintiff for the losses suffered by Plaintiff because the defective part #1 & #2 installed in said product #1 & #2 was defective when distributed and sold by Defendant, was not merchantable and was not reasonably suited to the use intended, said defective condition having existed at the time of sale. Specifically, Plaintiff shows that the defects existing in the defective part #1 & #2 installed in said product #1 & #2 include, but are not limited to, defects in design and engineering of the defective part #1 & #2 installed in said product #1 & #2, defects which were unreasonably dangerous and pose an unreasonable risk of serious injury or death to the users of said product #1 & #2 due to malfunctions of said product #1 & #2 resulting from defective design and manufacture of the defective part #1 & #2.

29. Plaintiff further shows that Defendant failed to utilize economical and technically available safety design alternatives insofar as the design of the defective product #1 & #2 is concerned.

30. Defendant's defective product #1 & #2 failed as a result of the negligence of Defendant described in Count I & II so that Defendant's negligence was the proximate cause of the incident and resulting damages described above in the **STATEMENT OF FACTS** section of Plaintiff's complaint; and, said incident and said damages was reasonable perceivable by Defendant at all times relative to Plaintiff's complaint.

COUNT C: BREACH OF EXPRESS AND IMPLIED WARRANTIES BY DEFENDANT

31. Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 30 as if set forth verbatim herein.

32. The defective part #1 & #1 installed in said product #1 & #2 was not merchantable, nor was it reasonably suited for the use intended, and as such, Defendant breached the express and implied

EA95-005-LC-2315

warranties of fitness for a particular purpose and of merchantability in that the defective part #1 & #2 in said product #1 & #2 posed an unreasonable risk of serious injury and death to its users due to the defective design of the defective part #1 & #2 which allowed for the malfunction of said product #1 & #2.

33. Defendant's defective product #1 & #2 failed as a result of the negligence of Defendant described in this Count I & Count II so that Defendant's negligence was the proximate cause of the incident and resulting damages described above in the **STATEMENT OF FACTS** section of Plaintiff's complaint; and, said incident and said damages was reasonable perceivable by Defendant at all times relative to Plaintiff's complaint.

II. PRAYER FOR RELIEF AND DAMAGES

WHEREFORE, Plaintiff demands judgment against Defendant in the amount of $11,316.50 (salvage is undetermined) and $1,446.99 for Count I and $12,560.00 (salvage is undetermined) for Count II for a total of $25,323.49, plus 12% pre-judgment interest, one-third attorney fees in the event of default, costs and 12% post-judgment interest; and that a writ of fieri facias issue commanding all Sheriffs within the State of Georgia and their lawful deputies to execute said writ by levy and seizure of Defendant's goods and lands.

May 21, 2003

Ronald W. Parnell
Attorney for Plaintiff
State Bar Number 564450

Our File #301-1551
Post Office Drawer 81085
Conyers, Georgia 30013
(770) 929-8585 Answer Service

EABS-005-LC-2316

IN THE STATE COURT OF COBB COUNTY, GEORGIA, CIVIL ACTION # 2003A

PLAINTIFF: [redacted]

(OUR FILE #301-1551)

VS

DEFENDANT: FORD MOTOR COMPANY

PLAINTIFF'S NOTICES TO DEFENDANT

I. NOTICE OF PLAINTIFF'S DESIRE TO SETTLE THIS LITIGATION

IN THE EVENT DEFENDANT DESIRES TO SETTLE PLAINTIFF'S CLAIM BUT IS UNABLE TO PAY THE TOTAL AMOUNT CLAIMED BY PLAINTIFF WITHIN 30 DAYS OF RECEIPT OF THIS NOTICE, THEN PLAINTIFF WOULD BE WILLING TO ACCEPT REASONABLE INSTALLMENT PAYMENTS UPON RECEIPT OF A WRITTEN OFFER OF SETTLEMENT FROM DEFENDANT.

II. NOTICE OF PLAINTIFF'S INTENTION TO SEEK ATTORNEY'S FEES IN THE EVENT OF DEFAULT BY DEFENDANT

IN THE EVENT A WRITTEN SETTLEMENT AGREEMENT IS NOT CONCLUDED WITHIN 30 DAYS OF SERVICE OF SUMMONS AND COMPLAINT UPON EACH DEFENDANT AND IN THE EVENT OF A DEFAULT BY DEFENDANT PLAINTIFF INTENDS TO SEEK ONE-THIRD ATTORNEY'S FEES PURSUANT TO O.C.G.A. L3-6-11 ON THE GROUNDS THAT DEFENDANT HAS BEEN STUBBORNLY LITIGIOUS AND HAS CAUSED PLAINTIFF UNNECESSARY TROUBLE AND EXPENSE AS A MATTER OF LAW BY FORCING PLAINTIFF TO RESORT TO THE COURTS WHEN NO BONA FIDE CONTROVERSY EXISTED.

III. NOTICE OF PLAINTIFF'S INTENTION TO SEEK INTEREST

IN THE EVENT A WRITTEN SETTLEMENT AGREEMENT IS NOT CONCLUDED WITHIN 30 DAYS OF SERVICE OF SUMMONS AND COMPLAINT UPON EACH DEFENDANT, THIS PARAGRAPH CONSTITUTES WRITTEN NOTICE PURSUANT TO O.C.G.A. 5L-L2-14 THAT IF EACH DEFENDANT FAILS TO PAY THE CLAIMED SUM WITHIN THIRTY (30) DAYS FROM RECEIPT OF THIS NOTICE, THEN PLAINTIFF SHALL BE ENTITLED TO RECEIVE INTEREST ON THE CLAIMED SUM (IF THE JUDGMENT IS FOR AN AMOUNT NOT LESS THAN THE CLAIMED SUM) AT THE RATE OF 12 PERCENT PER ANNUM FROM THE THIRTIETH (30) DAY FOLLOWING THE DATE OF EACH DEFENDANT'S RECEIPT OF THIS WRITTEN NOTICE UNTIL THE DATE OF JUDGMENT. (IN THE EVENT PLAINTIFF'S DAMAGES ARE LIQUIDATED, THE LEGAL RATE OF INTEREST SHALL BE 7 PERCENT PER ANNUM SIMPLE INTEREST WHERE THE RATE PERCENT IS NOT ESTABLISHED BY WRITTEN CONTRACT PURSUANT TO O.C.G.A. 7-4-2.)

IV. CONDITIONAL STIPULATION FOR EXTENSION OF TIME FOR DEFENDANT

IN THE EVENT A WRITTEN SETTLEMENT AGREEMENT IS NOT CONCLUDED WITHIN 30 DAYS OF SERVICE OF SUMMONS AND COMPLAINT UPON DEFENDANT, THEN DEFENDANT MUST OBEY THE SUMMONS WHICH REQUIRES DEFENDANT TO FILE WITH THE CLERK OF SAID COURT AND TO SERVE A COPY ON THE PLAINTIFF'S ATTORNEY AN ANSWER TO THE COMPLAINT WHICH WAS SERVED ON DEFENDANT WITHIN (30) DAYS AFTER SERVICE ON DEFENDANT, EXCLUSIVE OF THE DAY OF

ER05-005-LC-2317

SERVICE. IF YOU FAIL TO DO SO JUDGMENT BY DEFAULT WILL BE TAKEN AGAINST YOU FOR THE RELIEF DEMANDED IN THE COMPLAINT PLUS COST OF THIS ACTION. HOWEVER, PLAINTIFF AGREES TO EXTEND THE TIME FOR DEFENDANT TO FULLY ANSWER, OBJECT MOVE OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT IN WRITING FOR AN ADDITIONAL FIFTEEN (15) DAYS SUBJECT TO THE SPECIFIC CONDITION THAT DEFENDANT MUST FULLY ANSWER, OBJECT, MOVE OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT INTERROGATORIES, REQUEST TO PRODUCE AND REQUEST TO ADMIT IN WRITING BEFORE FILING ANY MOTION OR ANY DISCOVERY OR ANY OTHER DOCUMENT REQUIRING A RESPONSE BY PLAINTIFF.

V. NOTICE OF SERVICE OF DISCOVERY MATERIALS

IN THE EVENT A WRITTEN SETTLEMENT AGREEMENT IS NOT CONCLUDED WITHIN 30 DAYS OF SERVICE OF SUMMONS AND COMPLAINT UPON DEFENDANT, PLAINTIFF HAS SERVED DEFENDANT WITH COPIES OF THE LISTED DISCOVERY MATERIAL WITH THE SUMMONS AND COMPLAINT PURSUANT TO O.C.G.A. 9-11-4 (A)-(G): (1) FIRST INTERROGATORIES TO DEFENDANT (2) FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO DEFENDANT (3) FIRST REQUEST FOR ADMISSIONS TO DEFENDANT. DEFENDANT MUST FULLY ANSWER, OBJECT, MOVE OR OTHERWISE RESPOND TO PLAINTIFF'S DISCOVERY MATERIAL IN WRITING WITHIN 45 DAYS AFTER SERVICE ON DEFENDANT EXCLUSIVE OF THE DAY OF SERVICE.

CERTIFICATE OF SERVICE

PLAINTIFF'S ATTORNEY CERTIFIES THAT THIS DOCUMENT WAS SERVED UPON DEFENDANT WITH THE SUMMONS AND COMPLAINT IN THIS CASE PURSUANT TO O.C.G.A. 9-11-4 (A)-(G).

MAY 21, 2003

RONALD W. PARNELL,
ATTORNEY FOR PLAINTIFF,
STATE BAR # 564450
POST OFFICE DRAWER 81085
CONYERS, GA 30013
(770) 929-8585
301-1551.C

ER05-005-LC-2318

Consulting Service

Transportation Technology

1194 Wind Hill Lane
Marietta, Ga. 30064
Telephone / Fax (770) 426-6173
or Toll Free (877) 328-3385
www.vehicleinvestigator.com

CASE 23015

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1.0 ASSIGNMENT

1.1 Client: [redacted]

Johnny Lewis

1.2 Subject: 1997 Ford F-150 Truck

Ser# 1FTDX17W0VN[redacted]

Mileage: Could not determine

1.3 Location: Verastar

Oak Ridge Road

Tifton, GA

1.4 Purpose: Determine cause of fire.

1.5 Date of Inspection: February 19, 2003

2.0 Participating Personnel

2.1 Investigator: Michael E. Bresnock- Consultant

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3.0 EXAMINATION OF VEHICLE

3.1 Pursuant to a request from State Farm Insurance Company the above mentioned vehicle was inspected while it was situated on a parking stall at Verastar in Tifton, Georgia (Photo #1). It was our understanding that pre-fire repairs included replacement of the brake light / cruise control fuse. The vehicle was parked and unattended adjacent to the residence.

3.2 Proceeding in a clockwise direction from the front, the exterior surfaces were photographed to document the vehicle's condition at the time of the investigation (Photos #2, #3, #4, #5). The vehicle identification number and build date were recorded from a label on the driver's side door frame (Photo #6).

3.3 Most of the vehicle's aluminum hood had melted thereby exposing engine compartment components (Photo #7). The driver's side front tire and front fender sustained fire damage (Photo #8). The passenger's side front tire was fully inflated and there was no fire damage on the fender (Photo #9). Fire damage was also noted in the interior where upper levels of the dash had melted. The melt patterns were

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more extensive on the driver's side (Photo #10). The upper levels of the front seats and the passenger's side door panel exhibited fire damage. You will note that the fire damage on the lower levels of the door panel and the seat rests was minimal (Photos #11, #12). Both rear seat backs had some fire damage while the seat rests were completely intact (Photo #13). Several items from the fire were found in the cargo bed. Additionally, please note that the cargo bed was intact (Photo #14).

3.4 The tarp was rolled back to expose the windshield opening and examine burn patterns surrounding the windshield opening. One area of heavy oxidation was noted on the driver's side lower windshield opening. The remains of windshield sealer were apparent from the center (lower) windshield opening to the extreme right side. Additionally, the passenger's side vertical close out molding was intact. The remains of windshield sealer were also found on most of the upper windshield opening with some sealer and glass remains on the driver's side vertical opening (Photo #15). Undercarriage views showed no fire extensions from the engine or transmission (Photos #16, #17).

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3.5 This vehicle was equipped with a 4.6L fuel injected V-8 engine. The driver's side rear of the engine compartment sustained the most extensive fire damage (Photo #18). Although there are a number of components located on the driver's side of the engine compartment, the fire was centered around the location which was once occupied by the brake master cylinder. Most of the brake master cylinder, an aluminum bodied component, had melted (Photo #19).

3.6 Comparative views of the passenger's side show the remains of the fan shroud, rubber hose remains from the air conditioning lines and the partially melted plastic inner fender (Photos #20, #21, #22).

3.7 The height of the driver's side fire was determined from an inspection through the driver's side wheel opening. The lower radiator hose and a portion of the shroud were mostly intact (Photo #23). There were no indications of engine component melting below the valve cover which was partially decomposed (Photo #24). The power distribution box, located on the driver's side front fender had significant fire damage (Photo #25). Additionally, the cruise control servo amplifier, also located on

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the driver's side front fender, sustained somewhat less fire damage than the power distribution box located just forward of the cruise amplifier servo (Photo #26). The fire damage was inversely proportional as the distance from the brake master cylinder increased.

3.8 The insured's brake light / cruise control fuse replacement was addressed through a visual inspection of the remaining wires and a review of the wiring diagram. This vehicle was equipped with a trailer hitch and associated wires with a plug which was mounted to the rear of the vehicle. An examination showed the harness leading to the rear was factory like with plastic conduit covering the wires. There were no harness penetrations or visual indications of electrical shorting. A review of the wiring diagram shows the same 15 AMP fuse which controls the brake lights also supplies an electrical potential to the cruise control amplifier through the brake pressure switch. The brake light / cruise control circuit has an electrical potential at all times (even when the key is off) (Photocopy #1). The brake pressure switch is mounted to the brake master cylinder housing on this model vehicle which was the area designated as the fire's origin location (Photo #27).

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3.9 In consideration of the fire's origin location, at least two exemplar 1997 Ford F-150 pick-up trucks were inspected. The first vehicle was located in parking stall number #6010 and coincidently it had a burn pattern on the driver's side of the hood (Photo #28). The VIN number was recorded from the windshield label (1FTDX1864VN[redacted]). This vehicle was equipped similar to (1FTDX17W0VN[redacted] which was the subject of this investigation. An examination of the engine compartment showed the fire was centered around the brake master cylinder (Photo #29). The brake pressure switch was mounted at the front section of the brake master cylinder housing (Photo #30). A magnified view shows the failed switch (Photo #31).

4.0 CONCLUSIONS

4.1 The fire on VIN #1FTDX17W0VNE[redacted] originated at the left rear upper level of the engine compartment. This was determined from an analysis of burn patterns and fire damage found on the vehicle. The proximate cause of the fire was a failed brake pressure switch. Although the evidence on this vehicle was not limited to burn patterns and fire damage, the exemplar unit had similar patterns surrounding the

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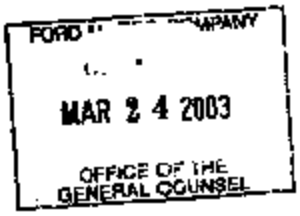
brake pressure switch. In consideration of this vehicle inspection, and a review of the wiring diagram, coupled with the previous repairs and the comparison with the exemplar vehicle, it is our opinion that the fire was caused by a failed cruise control brake pressure switch.

State Farm Insurance Companies

Subrogation Department
Post Office Box 100061
Duluth, Georgia 30096-9361

March 20, 2003

FORD MOTOR CO
PARKLANE TOWERS WEST SUITE 400
3 PARKLANE BLVD
DEARBORN, MI 48126-2568



RE: Claim Number: [redacted]
Date of Loss: July 17, 2002
Our Insured: [redacted]

Dear :

This State Farm insured 1997 Ford F150 was involved in a fire. We settled a claim with our insured in the amount of $11316.50, which includes our insured's deductible. Our investigation revealed the cause of the loss was due to failure of the brake pressure switch. The evidence is being held for your inspection. Please consider this letter as our demand to Ford for reimbursement of $11316.50

If you have any questions, please call me at the number below.

Sincerely,

Johnny Lewis
Claim Representative
(770) 418-3252
1-866-796-4787 (Outside Metro Atlanta)

State Farm Mutual Automobile Insurance Company

[redacted]

CAUSE NO. 02CV0743

[redacted]	§	IN THE DISTRICT COURT OF
	§	
	§	
VS.	§	GALVESTON COUNTY, TEXAS
	§	
FORD MOTOR COMPANY, TEXAS	§	
INSTRUMENTS, INC., E.I. DUPONT DE	§	
NEMOURS AND COMPANY and	§	
GENE HAMON FORD, INC.	§	405th JUDICIAL DISTRICT

PLAINTIFFS' ORIGINAL PETITION

TO THE HONORABLE JUDGE OF SAID COURT:

COME NOW, Plaintiffs, [redacted] complaining of Gene Hamon Ford, Inc. ("Hamon"), Ford Motor Company ("Ford"), Texas Instruments, Inc. ("TI") and E. I. DuPont De Nemours and Company ("DP") and would show unto the court as follows:

I. Parties & Venue:

Plaintiffs are residents of Tiki Island, Galveston County, Texas.

Defendant, Ford Motor Company, is a Delaware Corporation with its principal place of business in Michigan and may be served with process, by certified mail, return receipt requested, by serving its registered agent, CT CORP SYSTEM, 350 N. ST. PAUL STREET, DALLAS, TEXAS 75201

Defendant, Texas Instruments, Inc., is doing business in Texas and may be served with process, by certified mail, return receipt requested, by serving its registered agent, Richard J. Agnich, 7839 Church Hill Way, MS 3999, Dallas, Texas 75251.

Defendant, E.I. Du Pont De Nemours and Company, is a Delaware corporation and may be served process, by certified mail, return receipt requested, by serving E.I. Du Pont De Nemours and Company, Room 0042, Du Pont Building, 1007 Market Street, Wilmington, Delaware 19898.

Defendant, Gene Hamon Ford, Inc., is doing business in Texas and may be served with process, by certified mail, return receipt requested, by serving its registered agent, Tony Gene Hamon, 2600 Palmer Highway, Texas City, Texas 77590.

Venue is proper in Galveston County, Texas because all or part of the conduct complained of herein took place in Galveston County, Texas, and because at least one Defendant conducts business there.

2. Discovery Control Plan

The Plaintiffs move the court to enter a discovery control plan pursuant to TRCP §190.4 which includes two sets of interrogatories of no more than 30 written interrogatories, excluding interrogatories asking a party only to identify or authenticate specific documents. Plaintiffs will submit a proposed discovery control plan after conversing with Defendants' counsel.

3. Facts and Background

In or around 1997 Plaintiffs, [redacted] purchased from Hamon a 1997 Ford F150 XLT Lariat pickup truck manufactured and designed by Ford and equipped with a defective speed control deactivation switch, manufactured and marketed by Y) which utilized defective components manufactured by DP known as "KAPTON$_{(R)}$".

On or about May 31, 2002 the Everts Plaintiffs parked their Ford pickup under their Tiki Island bay house residence. The defective speed control deactivation switch either solely or in combination with the "KAPTON$_{(R)}$" and/or other defective electrical components, wiring and/or circuits on the truck, was the ignition source for the fire which originated in the pickup and consumed Plaintiffs' truck, Plaintiffs' residence, personal property, family photographs and other irreplaceable memorabilia.

Plaintiff, Al Albrighton is a next door neighbor of the Everts. Al Albrighton's motor home was

damaged in the fire on May 31, 2002.

4. Negligence

The Defendants were negligent in one or more of the following particulars and such negligence was a proximate cause of Plaintiffs' damages:

As to Defendant, Hamon:

a. In failing to notify Plaintiffs of the defective condition of their truck when Defendant knew or should have known of such condition;
b. In failing to timely remedy the defective condition;
c. In failing to remedy the defective condition when the truck was presented to an authorized Ford dealer for service;
d. In failing to timely or properly notify Plaintiffs' to present their vehicle for service at an authorized Ford dealer;
e. In failing to monitor the Defendants' customer list to identify, locate and notify customers, such as Plaintiffs, who own defective vehicles;
f. In failing to advise Plaintiffs not to park the truck in a garage, carports, or other items capable of catching fire; and
g. In other respects as may be shown at trial.

As to Defendants, Ford, TI and DC:

a. In failing to timely and properly notify Plaintiffs of the defective condition of their vehicle;
b. In failing to remedy the defective condition;
c. In failing to advise authorized Ford dealerships to remedy the defective condition;
d. In failing to properly monitor and locate vehicle registrations to identify and locate customers, such as Plaintiffs, who own defective vehicles;
e. In failing to advise Plaintiffs' not to park the automobile in a garage, carport or items capable of catching fire;
f. In manufacturing and distributing Plaintiffs' vehicle without correcting defects;
g. In failing to adequately investigate fires occurring in the subject vehicle line which included a similar cause and origin of the fires in question;
h. In failing to institute a timely or effective vehicle recall campaign;
i. By negligently designing the electrical circuit which controls the vehicles' cruise control;
j. By designing an electrical circuit that supplies continuous electrical power to the speed control switch when the vehicle is parked, not running with

the ignition key off, thereby providing an ignition source for the fire;

k. By failing to provide adequate engineering design specifications to TI and/or DP concerning the number of cycles the speed control deactivation switch would encounter over the subject vehicles' foreseeable life. Additionally, Ford failed to consider or provide switch cycle data created by the vehicles' anti-lock brake, suspension leveling and traction control systems;

l. By failing to provide adequate engineering design specifications to TI;

m. By failing to include an adequate electrical current limiting device in the electrical circuit which supplies power to the switch;

n. By instituting an unreasonable date of production to achieve "Job One;"

o. In failing to adequately manufacture, investigate, engineer and/or test the speed control switch prior to distribution to Ford for inclusion into the subject vehicles;

p. In failing to design a speed control switch which does not allow the intrusion of corrosive substances in contact with the electrical components of the switch;

q. In failing to test the speed control switch prior to distribution based on foreseeable electrical, thermal, cyclical, and environmental conditions the switch would encounter during the expected life of the vehicle and/or speed control switch;

r. In failing to consider previous failure and/or engineering problems associated with the use of "KAPTON®" in similar hydraulic pressure switches where chemical attack, mechanical forces, and/or manufacturing processes were suspected but not considered during the design, manufacture and/or marketing of the speed control deactivation switch installed on Plaintiffs' vehicles;

s. In failing to advise Ford and/or DP and/or the Plaintiffs that "KAPTON®" failures had occurred in other similarly designed pressure switches;

t. In supplying and/or distributing defective components for installation in vehicles such as Plaintiffs without correcting such defects;

u. By failing to design and manufacture the switch with electrical components which would not corrode and cause an electrical short and fire; and

v. In such other respects as may be shown by the discovery or at trial.

5. Gross Negligence

The Plaintiffs' resulting damages, injuries and losses were caused by the gross negligence, fraud and malice of the Defendants. The conduct of Defendants Ford and TI constitutes gross negligence, fraud and malice as those terms are understood under Texas law and as defined by Section 41.001 Tex. Civ. Prac. and Rem. Code, in that it constituted a conscious indifference to the rights and welfare of persons

affected by it. The Defendants' fraud and deceit will, in one way, be shown by Ford's and TI's spoliation of evidence that has been uncovered during the course of this lawsuit. As a result, Plaintiffs seek to recover exemplary damages from Defendants, Ford and TI as a result of their gross negligence, fraud, deceit and malice. Plaintiffs intend to show that the factors the jury may consider in determining the amount of exemplary damages which should be awarded include :

1. the nature of the wrong committed by Ford and TI;
2. the character of Ford's and TI's conduct;
3. the degree of culpability of Ford and TI;
4. the situation and sensibilities of the parties concerned; and
5. the extent to which Ford's and TI's conduct offends a public sense of justice and propriety.

The Plaintiffs believe that exemplary damages should not exceed Three Million Dollars ($3,000,000.00).

3. Damages

Plaintiffs would show that their damages, injuries and/or losses are within the jurisdictional limits of this Court, and include property damages, loss of their vehicle(s), home, home contents, loss of use of vehicle and home, mental anguish, costs to repair or replace their property, and any other consequential damages foreseeably arising from the incident in question.

Plaintiffs would show that they are entitled to reasonable and necessary attorney fees and costs of prosecuting this matter.

Plaintiffs would show that they are entitled to pre-judgment and postjudgment interest at the maximum rate allowed by law.

REQUEST FOR RELIEF

(a) Plaintiffs request that Defendants be cited according to law to appear and answer;

(b) Plaintiffs demand judgment against Defendants for all actual damages within the jurisdictional limits of the Court and for attorneys' fees, and all statutory additional (or exemplary) damages as set forth above, costs of court, and prejudgment and post judgment interest at the highest lawful rates;

(c) Plaintiffs also ask for such other relief to which they may be entitled

Respectfully submitted:

By: _____

Norman Jolly
TBA# 10859920
1018 Preston, 4th Floor
Houston, Texas 77002
(713) 237-0303
Fax: (713) 237-0383

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2300 BANKONE CENTER 1717 MAIN STREET DALLAS, TX 75201-733
214.462.3000 800.448.1207 214.462.3299 FAX www.cozen.com

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FORD MOTOR COMPANY
RECEIVED
CLAIMS UNIT
JUN - 4 2002
OFFICE OF THE
GENERAL COUNSEL

June 3, 2002

Jennifer L. Duncan
Direct Dial 214.462.3027
Direct Fax 214.915.4818
jduncan@cozen.com

VIA FACSIMILE (313/ 845-4089)
Ms. Shawn Norton
Office of the General Counsel
Ford Motor Company
Parkland Towers West
Suite 400
Three Parklane Boulevard
Dearborn, Michigan 48126-2568

New For Shawn

Re: Insured: [redacted]
Date of Loss: 05/31/02
Place of Loss: 222 Easterly, Tiki Island, TX 77554
Property Claim No.: [redacted]
Our File No.: 099994.000

Dear Ms. Norton:

This firm represents Allstate Insurance Company with respect to a fire loss that occurred on May 31, 2002, at 222 Easterly, Tiki Island, Texas 77554. Our preliminary investigation has revealed that the fire originated in a 1997 Ford XLT truck parked inside the garage and then spread to [redacted] home. I have requested the VIN number and will let you know the number as soon as possible.

The purpose of this letter is to put Ford on notice of a potential claim by Allstate for monies that it will pay to its insured [redacted] as a result of this fire. Although adjustment of the claim has just begun, it appears that the damages will exceed $100,000. Pursuant to Texas law, Allstate Insurance Company will be subrogated to certain rights of its insured.

The subject vehicle is still at the loss location and is available for Ford's immediate inspection. Please have your investigator contact me as soon as possible to schedule an inspection of the loss site.

2005-005-LC-2334

You can reach me directly at (214) 462-3027 if you have any questions or concerns. My fax number is (214) 462-3299. Thank you for your immediate attention to this matter.

Sincerely,

COZEN O'CONNOR

BY: Jennifer L. Duncan

JLD/jt

cc: (via facsimile)

Lisa Baker – Newell Investigations
(770/297-9133)