

24th JUDICIAL DISTRICT COURT, PARISH OF ST. JOHN THE BAPTIST

STATE OF LOUISIANA

NO. **48753**

DIVISION **Div. A**

[REDACTED]

VERSUS

FORD MOTOR COMPANY

FILED FOR RECORD
JAN 23 PM 2:20
CLERK OF COURT
ST. JOHN THE BAPTIST PARISH
LOUISIANA

DEPUTY CLERK

PETITION FOR DAMAGES

NOW INTO COURT, through undersigned counsel come Allstate Insurance Company ("Allstate") and [REDACTED] who respectfully represent:

I.

Allstate is a foreign corporation authorized to do and doing business in the State of Louisiana.

II.

[REDACTED] is a person of the full age of majority who resides at [REDACTED] Houma, Louisiana

III.

Male defendant herein is Ford Motor Company ("Ford"), a foreign corporation registered to do and doing business in the State of Louisiana.

IV.

Venue is proper in this case pursuant to Article 74 of the Code of Civil Procedure, as the incident giving rise to this litigation occurred in St. John the Baptist Parish.

V.

Ford should be required to pay Allstate and [REDACTED] all damages suffered by petitioners together with attorneys fees and legal interest thereon from the date of judicial demand until paid for the reasons set forth below:

VI.

At all material times, [REDACTED] was insured by a policy of insurance issued by Allstate.

VII.

In June, 1997, [REDACTED] purchased a new 1987 Ford Fourwinds recreational vehicle (hereinafter, "the RV") from a recreational vehicle dealership in Hammond, Louisiana.

VIII.

Upon information and belief, all equipment on the RV was original from the manufacturer at the time it was purchased by [REDACTED] in June, 1997. Part of this original equipment was the fuel injection system.

IX.

The fuel injection system was an integral part of the RV which was sold by Ford by recreational vehicle dealerships in various states, including Louisiana, within the United States.

X.

On January 27, 2001, a fire occurred in [REDACTED] RV.

XI.

The point of origin of the fire was determined to be the fuel injection system.

XII.

The fire was caused by a defective fuel injector within the RV's fuel injection system.

XIII.

The fire was the direct and proximate cause of damage to [REDACTED] RV and its contents.

XIV.

The total cost of [REDACTED] damage was \$40,807.75 plus amounts not covered by the Allstate policy as well as inconvenience costs.

XV.

The damage to Porlier's property resulted from the defective and malfunctioning fuel injector, manufactured and distributed by Ford.

XVI.

The fire was the direct and proximate cause of damage to [REDACTED] RV and its contents.

XVII.

[REDACTED] relied upon Ford's skill and judgment in designing, manufacturing and distributing recreational vehicles of this type.

XVIII.

Ford had a duty not to sell or supply products to the general public that are unreasonably dangerous, including the fuel injector inherent to the recreational vehicle in question.

XIX.

The fuel injector manufactured and sold as an inherent part of the RV by Ford was not of merchantable quality, unfit for the purpose for which it was intended, and was unreasonably dangerous in light of its foreseeable and intended use at the time it left the control of Ford in one or more of the following ways:

- a) it was defectively designed;
- b) it was defectively manufactured;
- c) it was improperly inspected; and
- d) it was improperly tested.

XX.

At all material times, Ford was under a duty to exercise reasonable care for the safety of [REDACTED] personal property.

XXI.

Ford and its respective agents and employees breached its duty by one or more of the following negligent acts or omissions:

- a) defectively designed the fuel injector;
- b) defectively manufactured the fuel injector;
- c) improperly inspected the fuel injector; and
- d) improperly tested the fuel injector.

XXII.

Before [REDACTED] purchased the RV, Ford either knew or should have known the purpose for which the fuel injector would be used.

XXIII.

Certain defects in the fuel injector were the cause of the fire in [REDACTED] RV.

XXIV.

Allstate and [REDACTED] aver that the fire and the resulting damages to [REDACTED] property were caused by the negligence, fault and/or strict liability of Ford in the following non-exclusive particulars:

- a) In failing to properly test and inspect the fuel injectors for manufacturing defects prior to distribution and sale;
- b) In manufacturing a fuel injector that malfunctioned and caused fire;
- c) In designing a fuel injector that malfunctioned and was defective in nature; and
- d) Other acts of negligence, all of which will be shown at the trial of this matter.

XXV.

As a direct and proximate result of Ford's breach of implied warranty of merchantability, because the fuel injector manufactured, distributed and sold by Ford was unfit for the purpose for which it was intended, Allstate suffered damages in the amount of \$40,307.75. Additionally, Portier was required to pay and did pay a deductible under the Allstate policy in the amount of \$500.00, and suffered other uninsured damages.

XXVI.

Ford implied a warranty to the public that the fuel injector was of merchantable quality. The fuel injector manufactured, distributed and sold by Ford was unfit for the purpose for which it was intended.

XXVII.

At the time of the incident at issue in this lawsuit, there was in effect a policy of property insurance issued by Allstate to [REDACTED] and pursuant to said policy, Allstate was called upon to pay and did pay under the coverage of its policy as a direct result of the above described incident.

XXVIII.

Upon payment under the policy, Allstate was subrogated under the laws of the State of Louisiana conventionally and legally to all the rights, title, interest and causes of action of Portier for the sums paid by Allstate under its policy of insurance, and in addition, it has

a separate cause of action under the laws of the State of Louisiana to recover the sums paid by it.

XXIX.

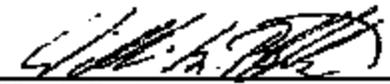
Defendant, Ford is indebted unto petitioners for the full amount of all damages caused by the defective and malfunctioning fuel injector and the resulting damages suffered by [REDACTED] in addition, Allstate is entitled to attorneys fees incurred in bringing this lawsuit.

XXX.

WHEREFORE, Allstate and [REDACTED] pray that this Petition for Damages be served upon Ford, and that after all legal delays and proceedings, there be a judgment entered in favor of Allstate and [REDACTED] and against defendant, awarding Allstate and [REDACTED] such damages and recoveries as are reasonable in the premises or as shown at trial, and further, that this judgment award Allstate reasonable attorneys fees and all costs of this action.

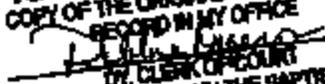
Respectfully submitted,

ALLSTATE INSURANCE COMPANY
AND BLAIR PORTIER


William M. Blackston #22004
HOFFMAN, SIEGEL, SEYDEL, BIENVENU
CENTOLA & CORDES
660 Poydras Street, Suite 2100
New Orleans, LA 70130-8121
(504) 523-1385

PLEASE SERVE:

FORD MOTOR COMPANY
through its registered agent,
CT Corporation System
#550 United Plaza Boulevard
Baton Rouge, Louisiana 70809

I HEREBY CERTIFY THAT THE ABOVE AND
FOREGOING IS A TRUE AND CORRECT
COPY OF THE ORIGINAL ON FILE AND OF
RECORD IN MY OFFICE

CLERK OF COURT
PARISH OF ST. JOHN THE BAPTIST, LA
DATE Jan 24, 2002

Hoffman, Siegel, Seydel, Bienvenu, Centola & Cordes

A PROFESSIONAL LAW CORPORATION

DONALD A. HOFFMAN
ROBERT L. SIEGEL
ROBERT A. SEYDEL, JR.
DAVID P. BIENVENU
LAWRENCE J. CENTOLA, JR.
MICHAEL G. CORDS
NATHAN L. SCHWARTZ
SHAWN L. HOLMAN

SUITE 2100 POYDRAS CENTER
650 POYDRAS STREET
NEW ORLEANS, LA 70130-6121
TELEPHONE (504) 523-1385
FAX (504) 524-6891
EMAIL mail@hscc.com

MICHAEL S. ALDER
MICHAEL A. BRATA
SPYROS K. SALAMONTE
WILLIAM H. BLACKBURN
DAVID S. BRADY
WILSON L. HALOZ III
JERUSA L. RUBENSTEIN

August 1, 2001

VIA CERTIFIED MAIL

Legal Department,
Ford Motor Company
16800 Executive Plaza Drive
P.O. Box 6248
Dearborn, MI 48121

Re: Allstate Insurance Company Claim [REDACTED]
Insured: [REDACTED]
DOL: 01/27/01
Location: Interstate 55, Laplace, Louisiana
Damage Amount: \$40,807.75

Dear Sir or Madame,

We represent the interests of Allstate Insurance Company in connection with the captioned claim.

On January 27, 2001, our insured [REDACTED] was driving his 1997 Ford Fourwinds Motorhome (VIN 1FDLE4053V [REDACTED]) on Louisiana Interstate Highway 55 to an automobile repair shop in LaPlace, Louisiana. As he was driving, he felt a significant amount of heat underneath the driver's seat and noticed a very strong smell of gasoline. [REDACTED] pulled to the shoulder of the road and, upon opening the hood of the motorhome, found flames emanating from the engine compartment. Within a matter of minutes, the entire motorhome was consumed in flames and completely destroyed. An investigation and inspection of the motorhome by a firm retained by Allstate revealed that the area of origin of the fire was the top left of the engine block, in the vicinity of the fuel rails and injectors and that the cause of the fire was fuel leakage from a defective fuel injector. [REDACTED] was the original owner of the motorhome having purchased it new from a Ford dealership in 1997. Up until the time of the fire, there had been no maintenance problems related to the fuel system of the vehicle.

Based on these facts and the report of the investigation and inspection, it is the opinion of Allstate Insurance Company that the cause of the fire in [REDACTED] motorhome was a defective fuel injector, a defect of a manufacturing nature and that,

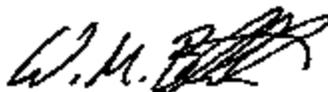
OUR ATTORNEYS ARE ADMITTED TO PRACTICE IN ONE OR MORE OF THE FOLLOWING JURISDICTIONS:
LOUISIANA, FLORIDA, DISTRICT OF COLUMBIA, AND TEXAS

EA85-005-LC-0197

as such, Ford Motor Company is responsible for the damages occasioned by the defect. We would ask that you please contact us prior to Monday, August 27, 2001 regarding a disposition of this claim or we will proceed and avail ourselves of those remedies allowed by law.

Looking forward to your response, I am,

Cordially,



William M. Blackston

INCIDENT REPORT

LaPlace Vol. Fire Department

NFIRS-1

FDID 48005	INCIDENT NO 010080	EXP NO. 00	MO 1	DAY 27	YR 01	DAY OF WEEK Saturday	7	ALARM TIME 09:58	ARRIVAL TIME 10:13	IN SERVICE 11:28													
TYPE OF SITUATION FOUND Vehicle fire						TYPE OF ACTION TAKEN 13 Extinguishment			MUTUAL AID 1 None														
FIXED PROPERTY USE Paved public street						IGNITION FACTOR 962 Ign Fctr undtmd			00														
CORRECT ADDRESS Highway 51 & Ruddock								ZIP CODE 70068		CENSUS TRACT 0													
OCCUPANT NAME							TELEPHONE (000)000-0000		ROOM OR APT.														
OWNER NAME				ADDRESS				TELEPHONE															
METHOD OF ALARM FROM PUBLIC Telephone tie-line to fire dept.						7		CO. INSPECTION DIST. 2		SHIFT V	NO. ALARMS 1												
NO. FIRE SERVICE PERSONNEL RESPONDING			7			NO. ENGINES RESPONDING		2		NO. AERIAL APPARATUS RESPONDING		0	NO. OTHER VEHICLES RESPONDING		1								
NUMBER OF INJURIES FIRE SERVICE				0				OTHER		0		NUMBER OF FATALITIES FIRE SERVICE				0		OTHER		0			
COMPLEX Road						96			MOBILE PROPERTY TYPE Motor Home						14								
AREA OF FIRE ORIGIN Engine/wheel area, running gr.						83			EQUIPMENT INVOLVED IN IGNITION Vehicle						96								
FORM OF HEAT IGNITION Undetermined rptd				00				TYPE OF MATERIAL IGNITED Undetermined reportd				00				FORM OF MATERIAL IGNITED Undetermined reportd				00			
METHOD OF EXTINGUISHMENT Preconn hose/tanks						5						LEVEL OF FIRE ORIGIN Grade to 8 feet				1				ESTIMATED LOSS (DOLLARS ONLY)			
						NUMBER OF STORIES				CONSTRUCTION TYPE													
EXTENT OF FLAME DAMAGE						EXTENT OF SMOKE DAMAGE																	
DETECTOR PERFORMANCE						SPRINKLER PERFORMANCE																	
IF SMOKE BEYOND ROOM OF ORIGIN		TYPE OF MATERIAL GENERATING MOST SMOKE						AVENUE OF SMOKE TRAVEL															
		FORM OF MATERIAL GENERATING MOST SMOKE																					
IF MOBILE PROPERTY		YEAR		MAKE		MODEL		SERIAL NO.		LICENSE NO.													
IF EQUIPMENT INVOLVED IN IGNITION		YEAR		MAKE		MODEL		SERIAL NO.															
OFFICER IN CHARGE (NAME, POSITION, ASSIGNMENT)										DATE													
Fire Chief Robert G. Bourgeois										1/27/01													
MEMBER MAKING REPORT (IF DIFFERENT FROM ABOVE)										DATE													
Driver Arnel Perret										1/27/01													

ER05-005-LC-0100

NOTES:

Vehicle fire on highway 51 about 1 mile North of Ruddock. Vehicle fully involved upon arrival of fire department. Vehicle was a motor home. Pull rear pre-connect off E53 to extinguish fire. E51 arrived on scene and transferred water to E51 which was then used to shuttle water to E53. Owner stated having problems with motor home. Complaining of gas fumes, was en route to shop when fire started.

Autosource Request #

ADP Recreational Vehicle PDA Sheet Question Contact ADP's Specialty Department • Voice (800) 251-3123 x4 • FAX (503) 786-3129 (Direct) • FAX (800) 91

Co. Name & Branch or ADP ID _____ Send Valuation Back To: Claim Rep. Phone # _____ FAX # (Required) _____

Year _____ Make _____ Model _____ Length _____ Chassis Mfg. _____ # Axles _____ Original Price _____ 1/27/01 Fire Market Area (City/State)

Year 1997 Make Ford Model Fourwinds Length 431 Foot Chassis Mfg. C # Axles 2 Original Price 9,800
VIN # 1FDLE4053VH Engine Sub: Turbo Gas Diesel # of Cyl. 901 Transmission: Manual Auto

- CAR ACC.**
- Power Seating
 - Power Windows
 - Power Locks
 - Power SEPS
 - Captain Chairs
 - Cruise Control
 - Tire Wheel
 - Dash Air Condition
 - Roof Air Cond.
 - Awning/Cover
 - AM/FM Cassette
 - CD
 - CB Radio
 - Driver Door
- ELECTRICAL**
- 110 Volt 12 Volt
 - AC/DC Converter
 - Inverter
 - Monitor Panel
 - Generator
- Watts _____

- LIVING AREA**
- Sleeps 8 People
 - 1 # Full Time Beds
 - 1 # Couches
 - 2 # Chairs (w. Dinette)
 - Dinette
 - 19" # TV's Color B/W
 - TV/VCR Combo
 - Separate VCR
 - Furnace
 - Gas Electric
 - Aux. Heater
- BATHROOM**
- Shower Tub
 - Sink Toilet
 - Porcelain
 - Hot Water Heater

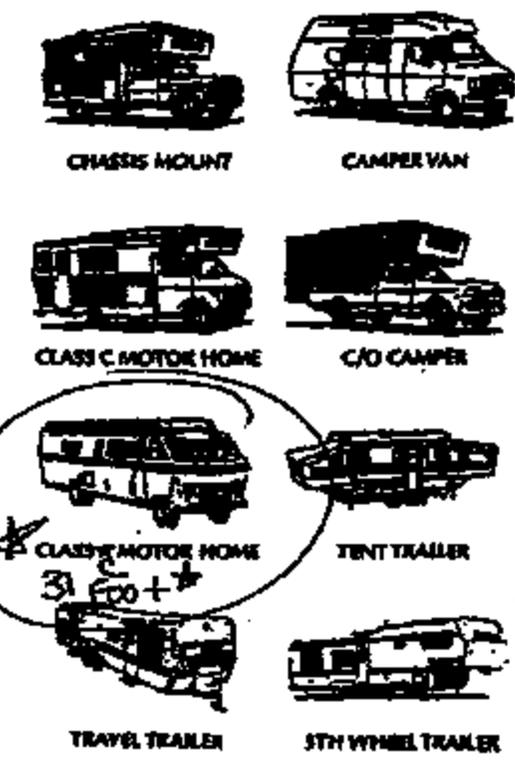
- GALLEY**
- Microwave
 - Stove
 - Oven
 - Gas Electric
 - Refrigerator
 - 2 Way 3 Way
 - Ice Box (Non-Powered)
 - Ice Maker
 - Water Purifier
 - Dishwasher
 - Food Processor
 - Blender
- FUEL/HOLDING TANKS**
- Grey Water
 - Waste Water
 - Fresh Water
 - _____ # LPC
 - _____ # Fuel

- MISCELLANEOUS**
- Main Awning
 - # Window Awnings
 - Trailer Hitch
 - Shore Out Room
 - Manual
 - Luggage Rack/Ladder
 - Roof Storage Pkg
 - Seawater Dist
 - Rear Mount Tire Carrier
 - Rear-View Video Camera
 - _____ # Solar Panels
 - Electric Soap
 - Single Double
 - Central Vacuum
 - 55-Ymph Tires
 - Washed Dye
 - Bubble-Road
 - Speed-Trim
 - Air-Horns

- SUSPENSION**
- Spring
 - Air Ride
 - Air-Ride
 - Other _____
- EXTERIOR SKIN**
- Steel
 - Aluminum
 - Fiberglass
- SUPER STRUCTURE**
- Steel
 - Aluminum
 - Wood
- LEVELERS**
- Manual 3/4" Jacks
 - Electric Screw
 - Hydraulic Ram
 - Computer Controlled

PLEASE DESCRIBE ANY ADDITIONAL EQUIPMENT, ACCESSORIES, OR FEATURES: Toaster, Coffee Pot, Rice cooker, Dishes, Pots, Pan Set, Cam Goods, etc.

CIRCLE MOST COMPARABLE VEHICLE BELOW



CONDITION

OVERALL INTERIOR RATING:
 EXCELLENT VERY GOOD GOOD FAIR POOR

OVERALL EXTERIOR RATING:
 EXCELLENT VERY GOOD GOOD FAIR POOR

MECHANICAL:

Engine Rebuild No Yes _____ Miles \$ _____ Cost _____ Date _____

Tr. mission Rebuild No Yes _____ Miles \$ _____ Cost _____ Date _____

Suspension Rebuild No Yes _____ Miles \$ _____ Cost _____ Date _____

TIRES:

Front _____ % Remaining Rear _____ % Remaining

Does it appear that the interior has been redone? No Yes

Carpets Upholstery Curtains Cabinets Counters Bathroom

Describe Dates and Costs _____

Was the interior updated to a more modern look, or was it done to original appearance?
 Modern Original

Has the unit been repaired? No Yes \$ _____ Cost _____ Date _____

Have any of the appliances been replaced? No Yes

Describe Dates and Costs _____

CONDITION COMMENTS: PLEASE DESCRIBE ANY NEEDED OR PERFORMED RECONDITIONING:

CLAIM PHOTOGRAPH

Claim No. [REDACTED]

Porter



DATE

Yes No

PHOTO # _____ TAKEN _____

Negative at _____

DESCRIPTI



COMMENTS

SUBMITTED BY: _____

NAME

DATE

G814-2

REPORT

VEHICLE FIRE CAUSE AND ORIGIN INVESTIGATION
1997 FOUR WINDS RV

February 9, 2001
Allstate Claim No.: [REDACTED]
QPG File No.: 101020-RIA

Submitted To:
Allstate Insurance Company
P.O. Box 1000
Covington, Louisiana 70434

Attention: John Hapton

Submitted By:
QUEST Forensic Group, LLC
113 Rosa Avenue, Suite A
Metairie, Louisiana 70005



Robert J. Alonzo, Principal

QUEST Forensic Group, LLC

Robert J. Alonzo, P.E.
Joseph J. Lafranca, Jr., P.E.

113 Ross Ave. - Suite A
Metairie, Louisiana 70005

(504) 834-0714
LAJMS: (800) 453-5611
Fax: (504) 834-0742

VEHICLE INSPECTION DATA SHEET QFG FILE: 101020-RJA

Inspected: 02/02/01	By: Robert J. Alonzo	
Ins. Co. Allstate	Rep.: John Hanlon	
Claim No. [REDACTED]	D/L: 01/27/01	
Vehicle: 1997 Four Winds	Owner: [REDACTED]	
DAMAGE FROM FIRE		
A. Exterior <input checked="" type="checkbox"/>	B. Engine Compartment <input checked="" type="checkbox"/>	C. Interior <input checked="" type="checkbox"/>
EXTERIOR		
Body:	31' Class C, Double Axle RV	
Vehicle Identification Number:	DL_E_CS3VHB46_10	
Prior Collision Damage:	None Evident	
Collision/vandalism damage:	None Evident	
Antenna	Consumed	
Mirrors	Consumed	
License Plates (Front and Rear)	Not on Vehicle	
Paint (Condition)		
Signs of Burn Patterns	Yes	
Total Burn	Yes	
Runs or Drips		
Fiberglass Body	Yes	
Roof Lines		
Top sagging/sunken panel	Consumed	
Hood		
Burn Patterns	Consumed	
Passenger Compartment		
Burn Pattern	Totally Consumed	
Contents		

Fuel Tank Cap and Filler Spout		Consumed	
Cap Missing		Yes	
Damage to Flange on Neck, Cap		Consumed	
Fuel Tank		Intact	
Tires, Rims & Hub Caps: (Inspect for loose nuts, mismatches, etc.)			
	Type	Condition	Remarks
Left Front		Consumed	
Left Rear		Consumed	
Right Rear		Consumed	
Right Front		Consumed	
Doors (Open, closed, locked, unlocked, electric locks, door jamb, stickers, etc.):			
Left Front		Closed	
Left Rear			
Right Rear			
Right Front		Closed	
Windows (Stained, melted, shattered, icicle patterns, up, down, electric, etc.):			
Front Windshield:		Melted	
Rear Windshield:		N/A	
Drivers Side (Front, Rear, Vent)		Front Up	
Passenger Side (Front, Rear)		Front Up	
ENGINE COMPARTMENT:			
Condition and/or Damages:		Heavy damage on top left side.	
Fire Wall (Condition & Description):		Breached	
Fluid Levels (Level & Condition):			
Oil:		Consumed	
Transmission:			
Radiator:		Consumed	
Power Steering:		Consumed	
Brake Fluid:		Consumed	
Rear End:		Consumed	

Battery:	Consumed
Mechanical Examination:	
Would Engine start?	No
Any missing accessories?	None Evident
Engine mounts, isolators intact?	
Oil and transmission dip sticks	
Aluminum Oil Pan	
Drive Shaft, Transmission	
Radiator Melted (Solder)	Totally Consumed
Fan/alternator belts melted	Consumed
Carburetor:	
Fuel rail or inlet (Fuel Injection):	Left side injectors more heavily damaged.
Fuel System:	
Fuel line connected?	Consumed
Drain plug missing?	
Tank filler cap missing?	Consumed
Electrical	
Insulation, beading, wiring	Slight beading near radiator.
Fuses or Fusible Links Blown?	Consumed
Beading on wire ends?	Small Amount Only
Battery melted?	Consumed
INTERIOR:	
Vandalism and/or theft damage:	
Keys:	Found on left front floor.
Single	
Ring	
Spare Set	
Signs of Hot Wiring	
Ignition	Consumed
Locked Steering	Consumed

Odometer Reading	Consumed. Owner reported 9800.
Wiring	Heavy arc activity. Harness severed.
Fuse Box	Consumed
Accessories (Stolen/Missing)	
Radio	In Dash
Tape Deck	In Dash
CD	
Telephone	
Glove Compartment (Open, closed):	Consumed
Seats (Covers, materials, etc.):	
Front (Buckets or Bench):	Consumed
Rear:	N/A
Flooring:	
Floor Mats:	Consumed
Carpet:	Consumed
Carpet Underlay:	Consumed
Containers:	
Glass	
Plastic	
Metal	
Contents:	
Clothing	
Tools	
Items under Seats	
Items on Seats	
Paper	
Tapes/CD's, etc.	
Spring Tension (Sagging)	
Hood	
Trunk	

Hinges	
Seats	
Evidence of Accelerant:	
<p>COMMENTS:Damage was heavier on the top center left of the engine. The left fiberglass valve cover was more heavily damaged than the right side. There was some melting on the rear of the aluminum block, near the exhaust connections. The intake manifold was totally consumed. The top of the aluminum transmission housing was slightly distorted on its center left side. The left side fuel rail and injector sustained more heavy damage than the right side rails. The aluminum block left side area, around the fuel inlet and return tubing to hose connections, did not have substantial melted aluminum damage, indicating that a leak did not initially occur at that point.</p>	
<p>The aluminum radiator and air conditioner condenser cores were totally consumed by the fire, more probable than not, from power steering leaks or front bumper plastic covering. The power steering pump was located adjacent to the battery. The cable harness, running across the front of the engine, sustained little arc damage. This indicated that the fire did not initiate at that point. There was heavy cable harness arc damage sustained on the left center side of the dash, above the engine left rear end.</p>	
<p>The owner reportedly stated that they smelled gasoline, while running the engine, approximately 1-1/2 weeks prior to the fire. The vehicle caught on fire while driving it to the dealer in Hammond, Louisiana, to repair the fuel odor problem. The damage observed on the top left side of the engine block is consistent with that expected from a fuel leak along the left fuel rail area, possibly involving the fuel injectors. The rear of the engine and transmission protruded into the passenger compartment and was covered with a fiberglass shroud. Heavy dash cable harness arc activity occurred near the interface of the fiberglass engine shroud and the dash. This is consistent with that expected with a fuel related fire initiating near the top of the engine.</p>	
<p>The preliminary findings are that the area of origin of the fire was the top left of the engine block, in the vicinity of the fuel rails and injectors. The cause of the fire was fuel leakage, more probable than not, from a defective fuel injector. This would not be expected from an engine with 9800 miles of use. The exact position of the leaking fuel injector is unknown. More probable than not, the ignition source was the exhaust manifold.</p>	
<p>Information of the vehicle service history will be required and should be requested from the owner and/or the dealership. A final report can be issued upon receipt of that information.</p>	

LIST OF FIGURES

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FIGURE 7:	PASSENGER COMPARTMENT - LOOKING FORWARD
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FIGURE 11:	LEFT REAR BLOCK AREA WITH FUEL AND FUEL RETURN LINES ENTRY
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FIGURE 16:	REAR CENTER LEFT TOP OF BLOCK - NOTE LEFT FUEL RAIL IN CENTER
FIGURE 17:	FRONT RIGHT CENTER OF BLOCK - NOTE CABLE HARNESS NOT ARC SEVERED
FIGURE 18:	TOP FRONT OF BLOCK - NOTE DAMAGE TO ALUMINUM ALTERNATOR HOUSING
FIGURE 19:	ENGINE COMPARTMENT
FIGURE 20:	ENGINE COMPARTMENT - NOTE RADIATOR AND EVAPORATOR CORES WERE CONSUMED



FIGURE 1: VEHICLE LEFT SIDE



FIGURE 2: VEHICLE FRONT

ENG-885-LC-0210

4000 REPORT 71100-210



FIGURE 3: VEHICLE RIGHT SIDE



FIGURE 4: VEHICLE REAR



FIGURE 5: VEHICLE IDENTIFICATION NUMBER

EROS-885-LC-8212

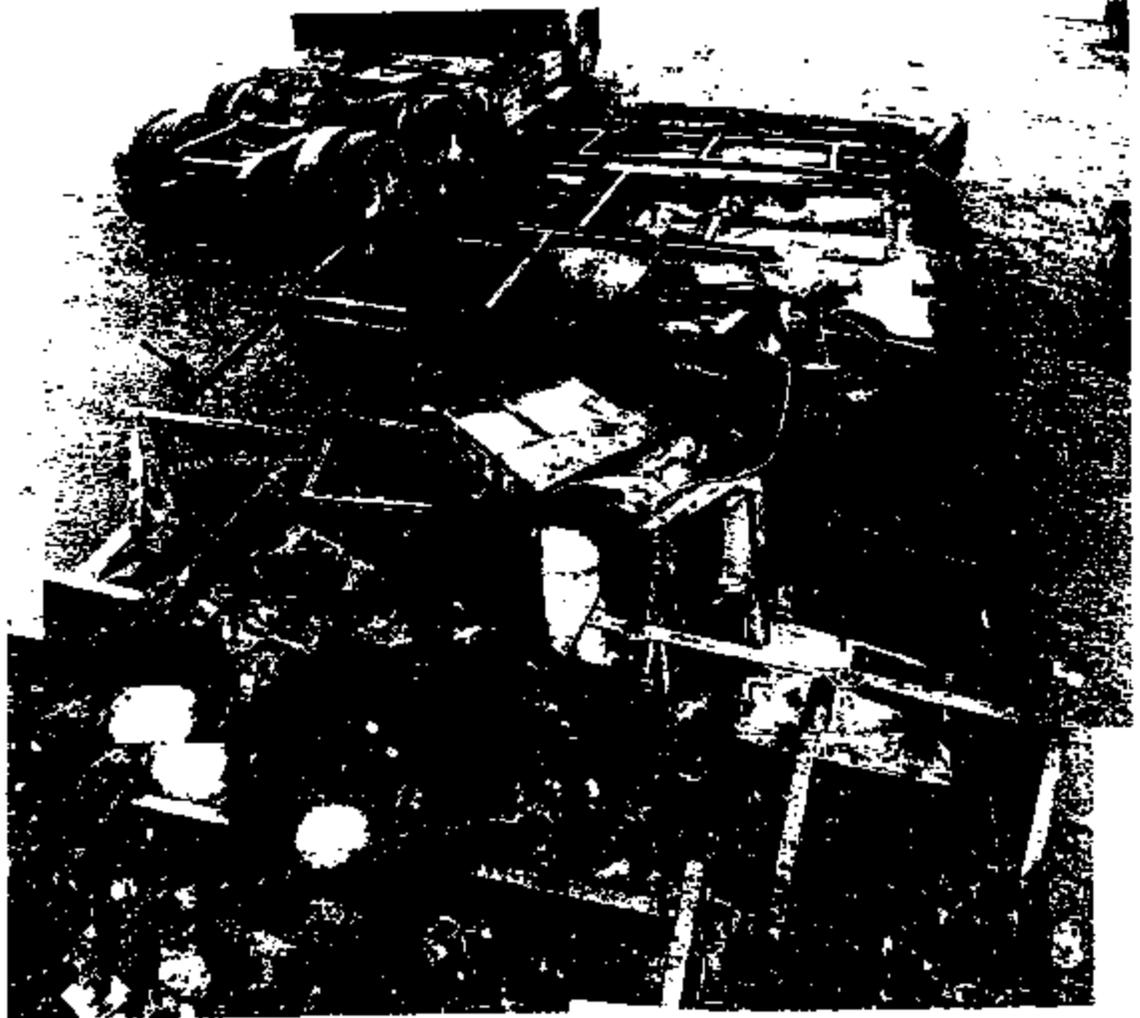


FIGURE 6: PASSENGER COMPARTMENT - LOOKING REAR

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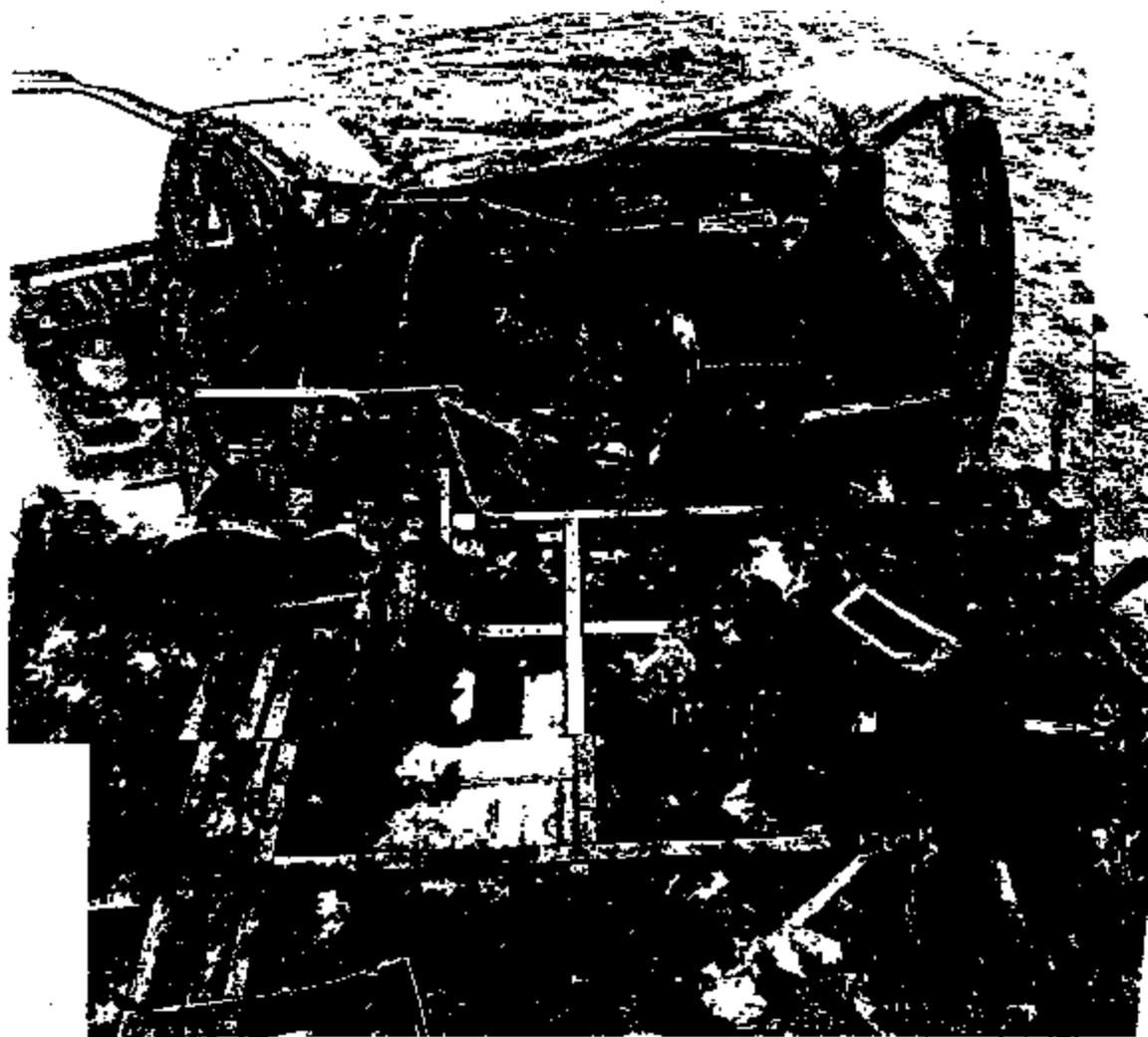


FIGURE 7: PASSENGER COMPARTMENT - LOOKING FORWARD

ERG-885-LC-8214

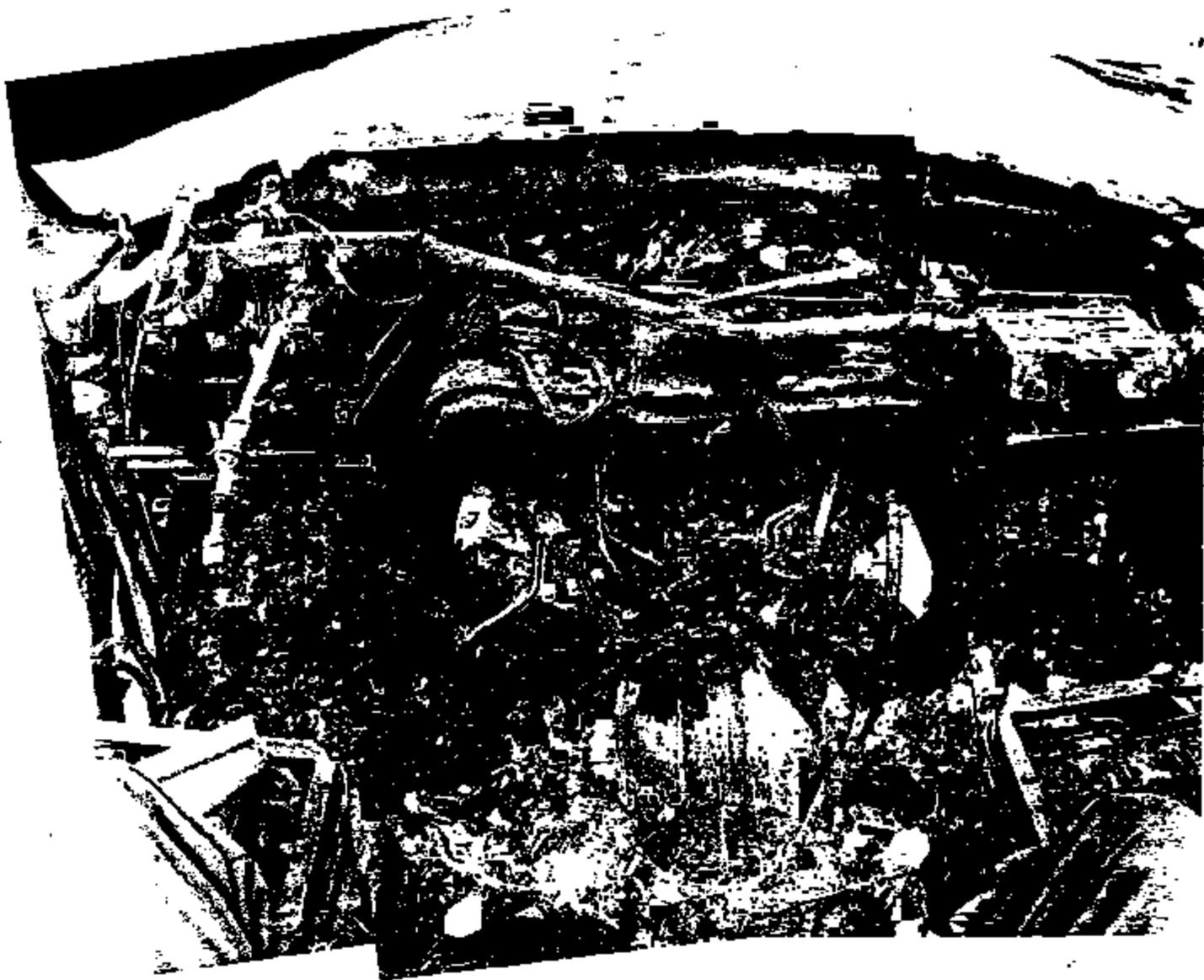


FIGURE 8: ENGINE SHROUD BETWEEN TWO FRONT SEATS

ER25-005-LC-9215



FIGURE 9: DASH CABLE HARNESS SEVERED ABOVE ENGINE BY ARC DAMAGE



FIGURE 10: ALUMINUM TRANSMISSION HOUSING WITH SLIGHT MELT DAMAGE



FIGURE 11: LEFT REAR BLOCK AREA WITH FUEL AND FUEL RETURN LINES ENT



FIGURE 12: LEFT REAR OF ALUMINUM ENGINE BLOCK WITH DAMAGED VALVE C



FIGURE 13: RIGHT REAR OF ALUMINUM ENGINE BLOCK WITH DAMAGED VALVE COVER



FIGURE 14: FUEL INLET AND RETURN RAILS AT TOP REAR OF BLOCK



FIGURE 15: VIEW OF ENGINE BLOCK FROM PASSENGER COMPARTMENT - NOTE INTAKE MANIFOLD WAS TOTALLY CONSUMED



FIGURE 16: REAR CENTER LEFT TOP OF BLOCK - NOTE LEFT FUEL RAIL IN CENTE



FIGURE 17: FRONT RIGHT CENTER OF BLOCK - NOTE CABLE HARNESS NOT ARC SEVERED



FIGURE 18: TOP FRONT OF BLOCK - NOTE DAMAGE TO ALUMINUM ALTERNATOR HOUSING

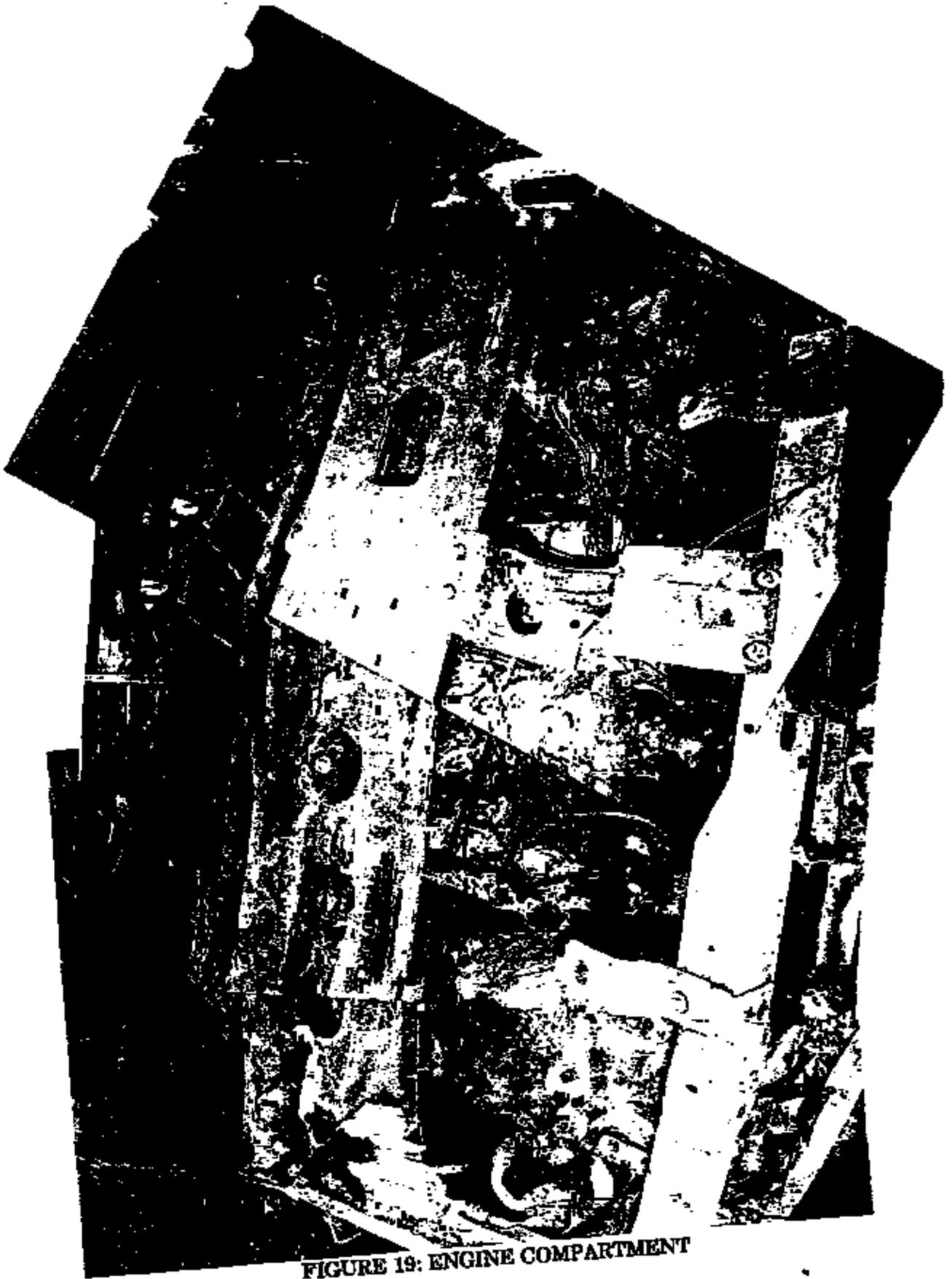
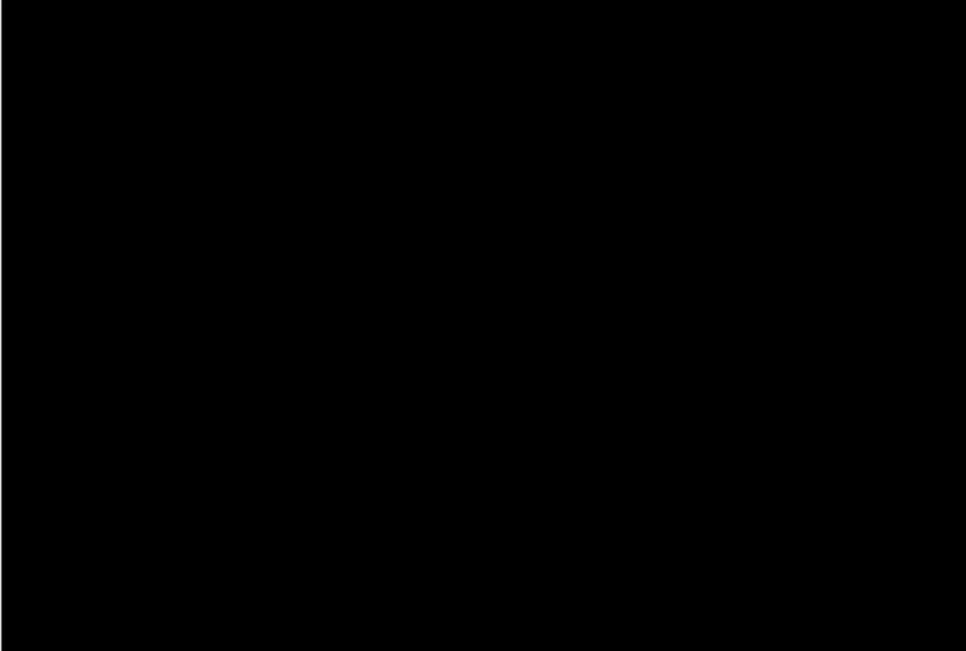


FIGURE 19: ENGINE COMPARTMENT

EROS-685-LC-9221



FIGURE 20: ENGINE COMPARTMENT - NOTE RADIATOR AND EVAPORATOR



IN THE COUNTY COURT, IN THE
EIGHTEENTH JUDICIAL CIRCUIT, IN AND
FOR BREVARD COUNTY, FLORIDA

CASE NO.:
DIVISION:

03-20-24 CC-013033-XXXX-XX

[REDACTED]
Plaintiff,

vs.

FORD MOTOR COMPANY,
a Foreign Corporation,

Defendant.

**COMPLAINT
COUNT I**

Plaintiff [REDACTED] as subrogee of [REDACTED]

[REDACTED], sues Defendant, Ford Motor Company and alleges:

1. This action is for damages, which is greater than \$5,000.00, but does not exceed \$15,000.00, exclusive of interest, attorney fees and costs by virtue of which this Court has jurisdiction.
2. Defendant Ford Motor Company, a Foreign corporation, is duly organized and existing and licensed to conduct and transact business within the State of Florida.
3. At all times mentioned in this Complaint, Defendant Ford Motor Company was in the business of designing, manufacturing, assembling, and placing into the stream of commerce automobiles and other vehicles. Defendant Ford Motor Company sells its motor vehicles throughout the United States, including the State of Florida, through its various franchised dealers.
4. Plaintiff purchased a 1998 Ford Explorer from an authorized dealer of the defendant.
5. On or about May 24, 2003, Plaintiff parked the 1998 Ford Explorer in the parking lot of 8701 Astronaut Boulevard, Cape Canaveral, Brevard County, Florida, leaving it unattended. While parked and unoccupied, said vehicle ignited causing it to be burned. Flames engulfed said vehicle, resulting in damage to the Plaintiff's vehicle.
6. Investigation following the incident revealed that there was most likely a result of a

failure or malfunction of an item within the power distribution box, and this failure caused the vehicle to be damaged as a result of a fire.

COUNT II

7. Plaintiffs adopt and realleges paragraphs 1 through 6 of this Complaint as if set forth fully herein.

8. At all times mentioned in the Complaint, Defendant, Ford Motor Company was engaged in the business of designing, manufacturing, assembling, distributing and selling automobiles and other motor vehicles. Defendant sells its motor vehicles throughout the United States, including the State of Florida, through its various franchised dealers.

9. Sometime prior to May 24, 2003, Defendant, Ford Motor Company, designed, manufactured, and assembled a 1998 Ford Explorer, vehicle identification number IFMYU22E3WL [REDACTED]. After designing, manufacturing, and assembling the 1998 Ford Explorer Defendant, Ford Motor Company sold and delivered the automobile to an authorized dealer of the Defendant for resale to the public.

10. Plaintiffs purchased the automobile described above.

11. Plaintiffs took delivery of the automobile described above and proceeded to use it for her personal transportation.

12. On or about May 24, 2003, after Plaintiff parked the aforementioned vehicle, said vehicle ignited causing it to be burned while the vehicle was parked and unoccupied. Flames engulfed said vehicle, resulting in damage to the Plaintiff's vehicle.

13. The 1998 Ford Explorer was subject to an express warranty, including but not limited to it being free from defects in material and workmanship, a copy of which is in the possession of Defendant, Ford Motor Company.

14. Defendant, Ford Motor Company breached said warranty by selling to Plaintiff said vehicle in condition that was defective in material or workmanship.

15. As a result of Defendant's breach, Plaintiffs have been damaged. Said Vehicle of the Plaintiffs were damaged and depreciated and the Plaintiffs have incurred damages therefore in the amount of \$12,176.32

WHEREFORE, Plaintiff prays for Judgment against the Defendant, Ford Motor Company, in the amount of \$12,176.32, interest from and after May 24, 2003 and for their costs herein incurred.

COUNT III

17. Plaintiff incorporates herein Count I and Count II in their entirety.

18. Defendant, Ford Motor Company is a "seller" as same as contemplated in Article 2 of the Florida Uniform Commercial Code, 672.103 et seq.

19. Said vehicle sold by Defendant, Ford Motor Company to Plaintiff was subject to an implied warranty of merchantability that the vehicle was fit for the ordinary purpose for which such goods are used.

20. Defendant, Ford Motor Company knew, or in the exercise of reasonable care should have known, that except for the implied warranty described above, Plaintiff would not have purchased the 1998 Ford Explorer.

21. The 1998 Ford Explorer was not as warranted by Defendant, Ford Motor Company, in that it contained the defects described above, which defects caused the automobile to be unmerchantable and unfit for use as personal transportation.

WHEREFORE, Plaintiff prays for Judgment against the Defendant, Ford Motor Company, in the amount of \$12,176.32, interest from and after May 24, 2003 and for their costs herein incurred.

COUNT IV

22. Plaintiff incorporates herein Count I, Count II, and Count III in their entirety.

23. Defendant, Ford Motor Company is a "seller" as same as contemplated in Article 2 of the Florida Uniform Commercial Code, 672.103 et seq.

24. Said vehicle sold by Defendant, Ford Motor Company to Plaintiff was subject to an implied warranty of merchantability that the vehicle was fit for the ordinary purpose for which such goods are used.

25. Defendant, Ford Motor Company knew, or in the exercise of reasonable care should

have known, that except for the implied warranty described above, Plaintiff would not have purchased the 1998 Ford Explorer.

26. The 1998 Ford Explorer car was not as warranted by Defendant, Ford Motor Company, in that it contained the defects described above, which defects caused the automobile to be unmerchantable and unfit for use as personal transportation.

WHEREFORE, Plaintiff prays for Judgment against the Defendant, Ford Motor Company, in the amount of \$12,176.32, interest from and after May 24, 2003 and for their costs herein incurred.

Dated at Cocoa, Brevard County, Florida, October 20, 2004.

VANCE, LOTANE & BOOKHARDT, P.A.
Attorneys At Law


 L. Alexander Vance, Esquire
Florida Bar No. 212601

Troy R. Lotane, Esquire
Florida Bar No. 0163015
1980 Michigan Avenue
Cocoa, FL 32922
321-636-4861
Attorney for Plaintiff

20031120

ERS-005-LC-5228

State Farm Insurance Companies



PO Box 9609
Winter Haven, FL 33883-9609

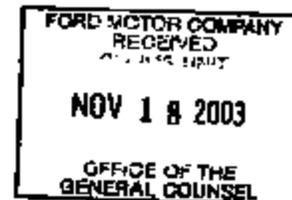
November 12, 2003

Ford Motor Company Parklane Towers West Ste 400
3 Parklane Blvd

Dearborn, MI 48126

RE: Claim Number: [REDACTED]
Date of Loss: May 24, 2003
Our Insured: [REDACTED]
Total Amount of Loss: \$12516.72 (salvage sale pending)
Our Payment: \$12176.32
Insured's Payment: 340.40

Your File Number:
Your Insured:



SUBROGATION CLAIM

We have been informed that you are the insurance carrier for the party designated as your insured in the caption of this letter.

Our investigation establishes that your insured was responsible for the damage to our policyholder's property as a result of the accident on the date indicated.

Please accept this letter as a notice of our subrogation rights and communicate with us in regard to your position on the matter.

Sincerely,

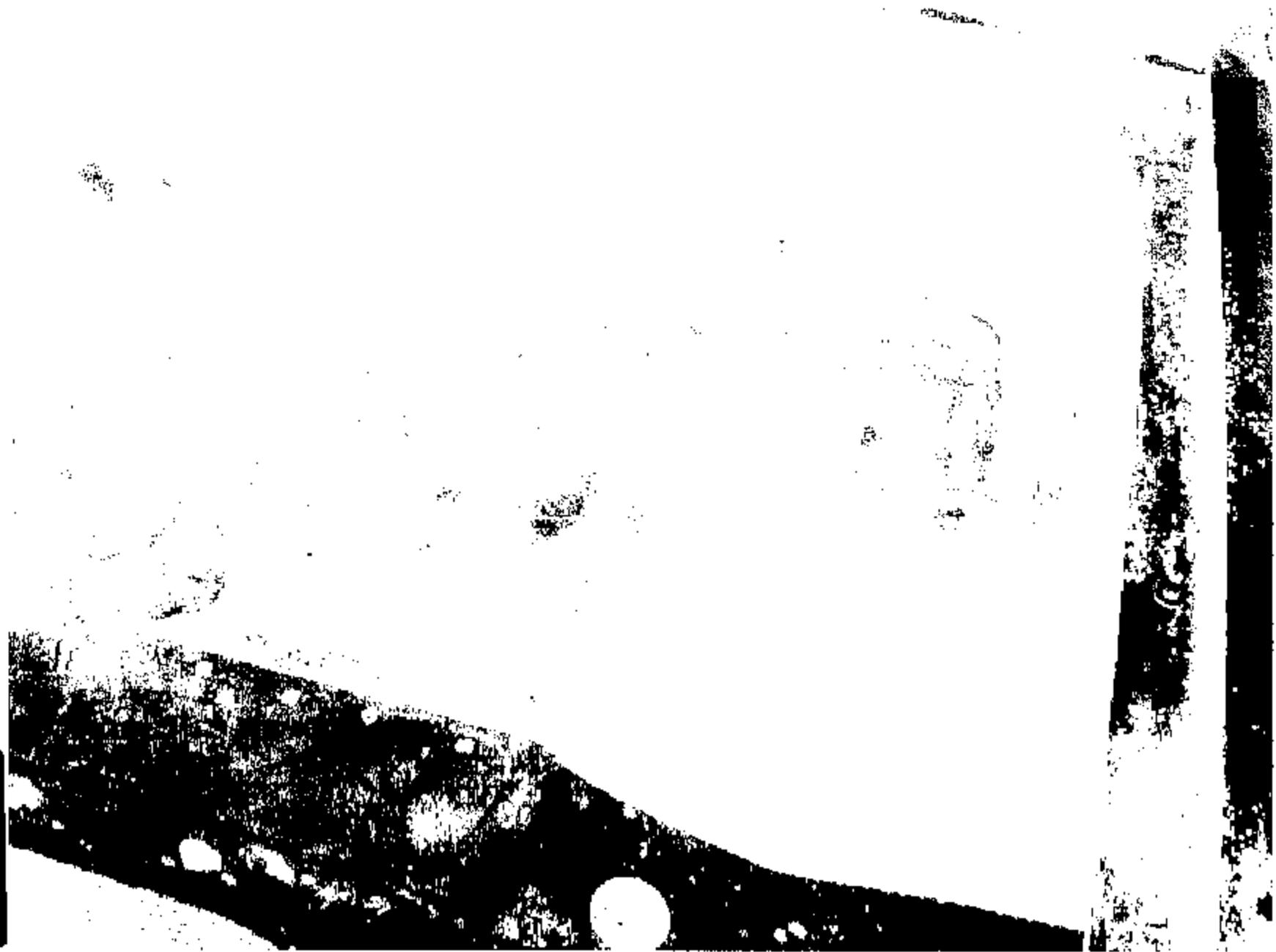
Team 34
F1 Central Subrogation
(800) 627-4028

State Farm Mutual Automobile Insurance Company
6394

Enclosure: Envelope for P.O. Box 9610

F100
5/24/03
\$12,516.72
196 Exp
JIN
135129 (M)

ENR-0091-LC-9228



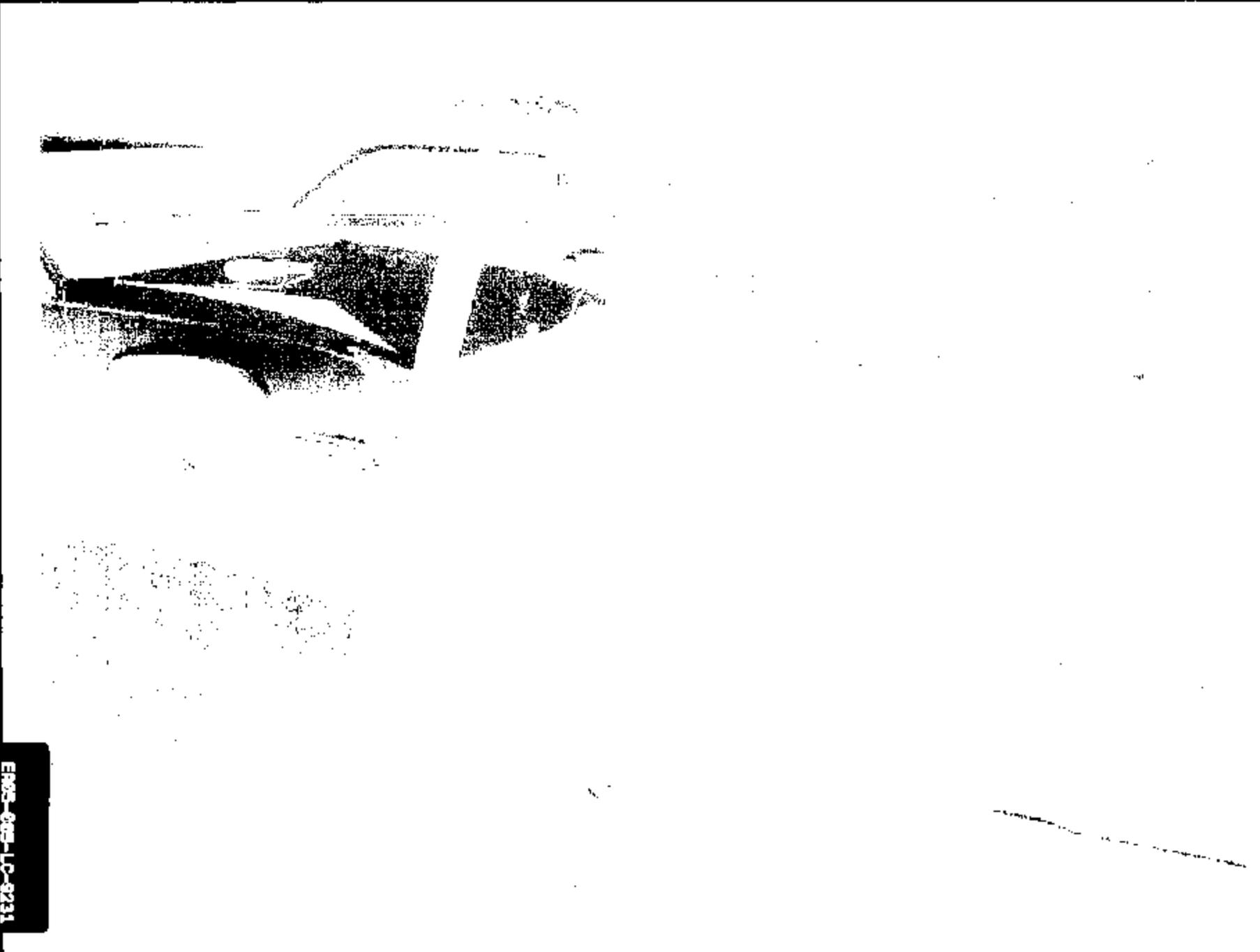
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EP005-0005-10-92219



E905-005-LC-0231

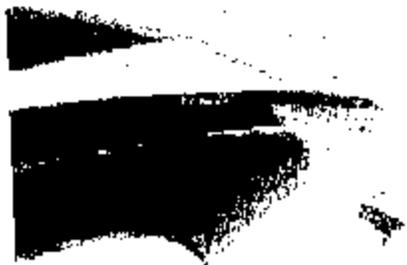
EMIS-602-LC-8232



EWING-088-1C-9253



EP05-005-LC-9234



EROS-2025-LC-0225





EM09-095-1C-9236

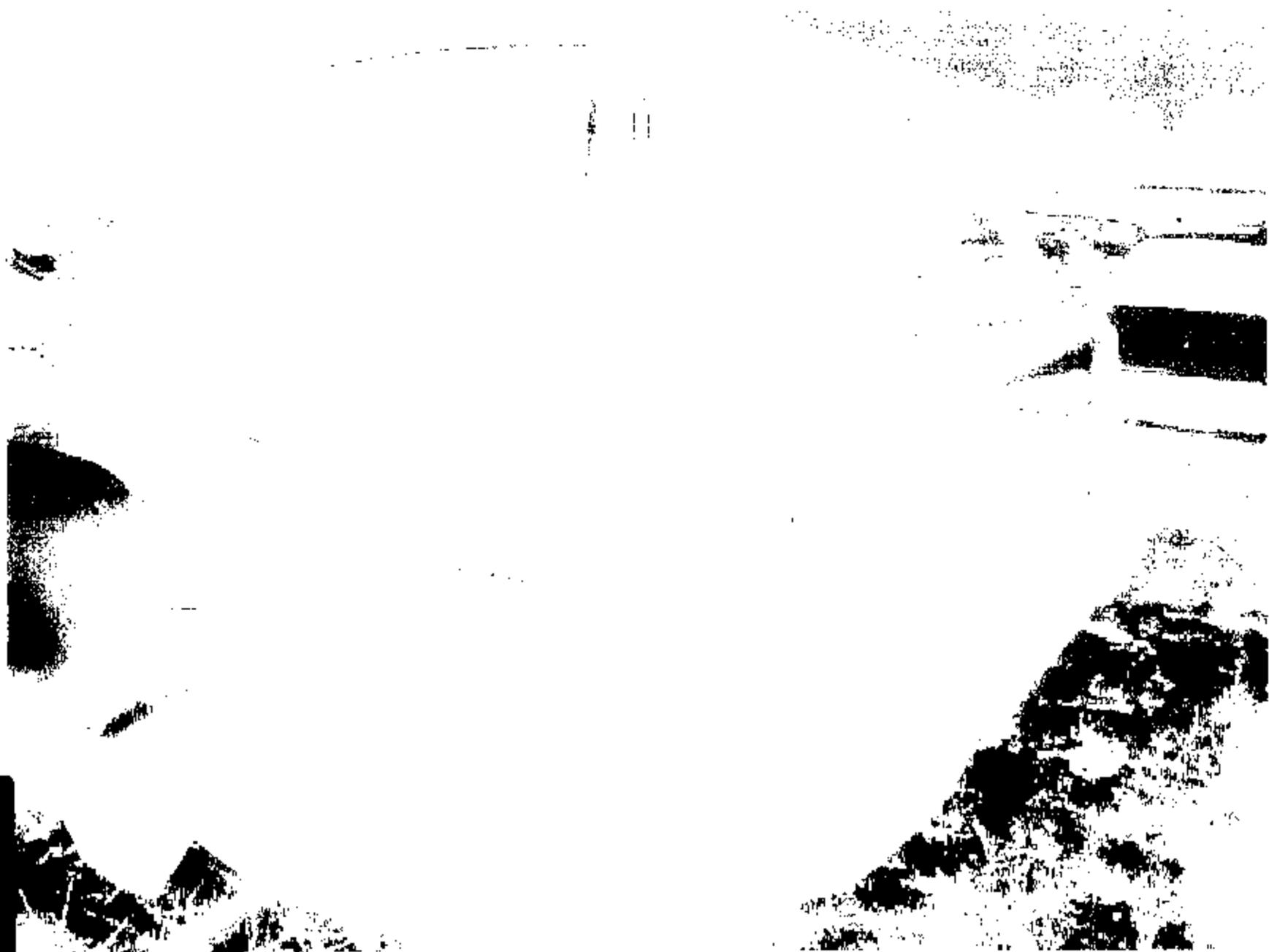
EP03-005-LC-0237



EROS-005-LC-8218



ERR-888-LC-9299



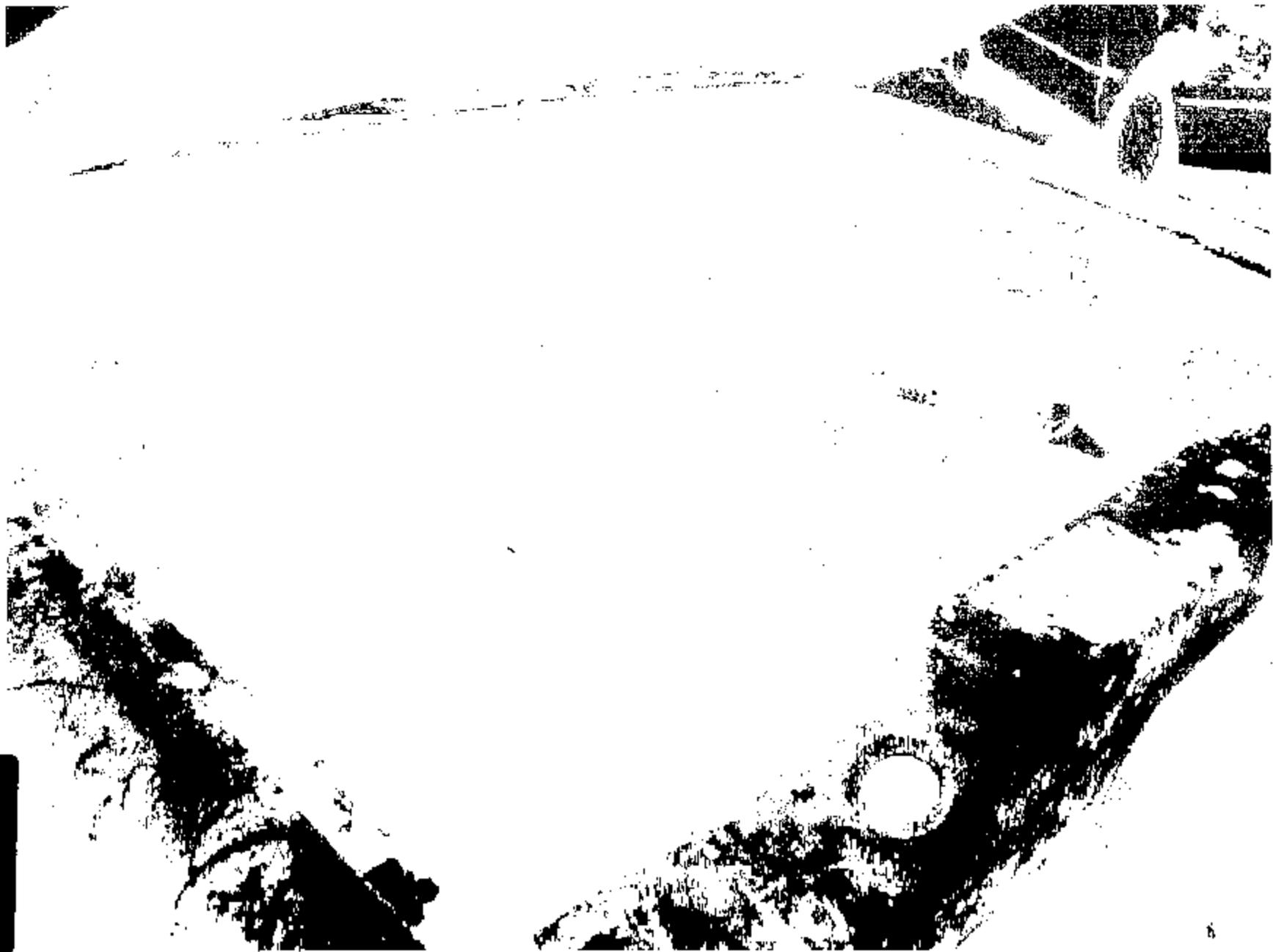
FD-302 (Rev. 11-27-60)





EP05-005-LC-9241

BRZ-085-LC-0242



18012 FD-204 05/24/2003 03 03-0000713 000

B Location
 Street address
 Intersection
 In front of
 Rear of
 Adjacent to
 Intersection
 Cape Canaveral
 Cape Canaveral
 State: FL Zip Code: 32925

C Incident Type
 139 Mobile property (vehicle) fire

D Aid Given or Received
 1 Actual aid received
 2 Ambulance aid given
 3 Ambulance aid given
 4 Ambulance aid given
 5 Other aid given
 6 None

E1 Date & Times
 Month: 06 Day: 24 Year: 2003
 Arrival: 02:18:00
 Departure: 04:14:00

E2 Shift & Alarm
 Alarm: 01
 Alarm: 001

E3 Special Studies

F Actions Taken
 11 Extinguish
 Primary Action Taken (1)
 Additional Action Taken (2)
 Additional Action Taken (3)

G1 Resources
 Apparatus: 0003
 Personnel: 0003
 Other: 0003

G2 Estimated Dollar Losses & Values
 Property: \$ 000,000
 Contents: \$ 000,000
 Property: \$ 000,000
 Contents: \$ 000,000

H1 Hazardous Materials Release
 1 None
 2 Flammable Gas
 3 Flammable Liquid
 4 Flammable Solid
 5 Corrosive
 6 Toxic
 7 Radioactive
 8 Other

I Mixed Use Property
 10 Not mixed
 20 Assembly use
 30 Education use
 40 Medical use
 50 Residential use
 60 Gov. & residential
 70 Office use
 80 Industrial use
 90 Military use
 00 Other mixed use

J Property Use
 131 Church, place of worship
 161 Restaurant or eatery
 162 Bar/ Tavern or nightclub
 213 Elementary school or kindergarten
 218 High school or junior high
 341 College, adult education
 311 Care facility for the aged
 331 Hospital
 341 Clinic, clinic type infirmary
 348 Doctor/clinic office
 361 Prison or jail, not juvenile
 419 1- or 2-family dwelling
 429 Multi-family dwelling
 439 Rooming/boarder house
 449 Commercial hotel or motel
 459 Residential, board and care
 464 Nursery/daycare
 519 Food and beverage sales
 539 Household goods, sales, repairs
 579 Motor vehicle/boat sales/repairs
 571 Gas or service station
 599 Business office
 619 Electric generating plant
 625 Laboratory/college lab
 700 Manufacturing plant
 819 Livestock/poultry storage(barn)
 882 Non-residential parking garage
 881 Warehouse
 981 Construction site
 984 Industrial plant yard

K Property Use
 124 Flagpoles or post
 158 Camp or orchard
 189 Forest (timberland)
 197 Outdoor storage area
 119 Swamp or sanitary landfill
 131 Open land or field
 238 Paved/cure for plot of land
 246 Lake, river, stream
 301 Railroad right of way
 300 Other street
 361 Highway/divided highway
 362 Residential street/driveway

Property Use: 300
 Nonresidential, business, Other
 FD-204 (Revision 07/1/99)

05/23/2003 14:28 3527969264

Person Involved

Local Office: _____ Insurance name (if applicable): _____ Agent Code: _____ Phone Number: _____

Check this box if you address an out-of-state jurisdiction. Please enter the three-digit state address lines.

Mr., Mr., Mrs. Check Name: _____ SS: _____ Last Name: _____ Middle: _____

Address: _____ Street or Highway: _____ Street Type: _____

City: _____ State: _____ Zip: _____

More people involved? Check this box and attach Supplemental Forms (SF100-LS) as necessary.

Person Involved

Local Office: _____ Insurance name (if applicable): _____ Agent Code: _____ Phone Number: _____

Check this box if you address an out-of-state jurisdiction. Please enter the three-digit state address lines.

Mr., Mr., Mrs. Check Name: _____ SS: _____ Last Name: _____ Middle: _____

Address: _____ Street or Highway: _____ Street Type: _____

City: _____ State: _____ Zip: _____

I. Remarks

Local Office: _____

Responded to report of structure fire at Radisson. arrived to find SUV in parking lot with engine compartment fire. Quick attack made, fire extinguished. SUV overhauled with cause of fire undetermined. Origin of fire appeared to be in the driver's fire wall area. Radiant heat damage to adjacent vehicles. Owner of SUV notified with heat damage to mirror, tire, and paint damage to right side and hood. Owner of Ford F-150 moved vehicle away from scene with damage to front grill area. Blue Mitsubishi owner not found, note left on car to contact fire dept. Heat damage noted to spare wheel cover. Fire vehicle removed by Doug's Towing.

Vehicles:

Ford Explorer: [Redacted] Tallahassee, FL [Redacted]

SUV: [Redacted] West Palm Bch. FL [Redacted]

Ford F-150: [Redacted] Ocoee FL [Redacted]

15/24/2003 05:34:10 19

Authorization

04 [Redacted] Borden, Troy Keith [CP] [D53] [05] [24] [2003]
Officer in charge ID Signature Position or rank Assignment Month Day Year

19 [Redacted] Holley, Larry Mark [RFP] [853] [05] [24] [2003]
Officer Number making report ID Signature Position or rank Assignment Month Day Year

05/23/2003 14:28 3527969264

INSURANCE SERVICES

PAGE 04

19011
POLY #

FL
COUNT #

5 24
SCHEDULE #

YYYY
2003

31
SECTION

02-0000713
SCHEDULE NUMBER #

000
SIGNATURE #

Complete
Narrative

Narrative:

Responded to report of structure fire at Radisson, arrived to find SUV in parking lot with engine compartment fire. Quick attack mode, fire extinguished. SUV overhauled with cause of fire undetermined. Origin of fire appeared to be in the driver's fire wall area. Radiant heat damage to adjacent vehicles. Owner of BMW notified with heat damage to mirror, tire, and paint damage to right side and hood. Owner of Ford F-150 moved vehicle away from scene with damage to front grill area. Blue Mitsubishi owner not found, note left on car to contact fire dept. Heat damage noted to spare wheel cover. Fire vehicle removed by Douga Towing.

Vehicles:

Ford Explorer, [redacted] Tallahassee, FL [redacted]
FL Tag HXK-620

BMW, [redacted] West Palm Bch, FL [redacted]
FL [redacted]

Ford F-150, [redacted] Ocoee FL [redacted]
FL [redacted]

05/24/2003 05:34:10 19

05/23/2003 14:28

3527969264

XXXX

19011

FL

05

24

2003

55

03-0000713

000

Single
 Group
 No Activity
 BR/RS - 2
 Fire

B Property Details

B1 **NOT Residential**
 Estimated Number of residential living units in building at point of loss or for all units known involved

B2 **Buildings not involved**
 Number of buildings involved

B3 **None**
 Acres burned (outside fire) **Less than one acre**

C On-Site Materials or Products

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

1 Bulk storage or warehousing
2 Processing or manufacturing
3 Palletized goods for sale
4 Repair or service

1 Bulk storage or warehousing
2 Processing or manufacturing
3 Palletized goods for sale
4 Repair or service

1 Bulk storage or warehousing
2 Processing or manufacturing
3 Palletized goods for sale
4 Repair or service

D Ignition

D1 **Engine area, running**
 Area at time of fire

D2 **Undetermined**
 Not known

D3 **Undetermined**
 Area first ignited # **1** **2** **3** **4** **5** **6** **7** **8** **9** **10**
 Area first ignited # **1** **2** **3** **4** **5** **6** **7** **8** **9** **10**
 Area first ignited # **1** **2** **3** **4** **5** **6** **7** **8** **9** **10**

D4 **Undetermined**
 Type of material first ignited

E Cause of Ignition

Check box if this is an external event, only in section 9

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

F Factors Contributing To Ignition

1 **None**
 Factor contributing to ignition (1)

1 **None**
 Factor contributing to ignition (2)

G Human Factors Contributing To Ignition

Check all applicable boxes

1 **None**
2 **None**
3 **None**
4 **None**
5 **None**
6 **None**
7 **None**
8 **None**
9 **None**
10 **None**

F1 Equipment Involved In Ignition

None if equipment was not involved, strip to Section 6

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. It 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

Not involved in ignition, but damaged

Involved in ignition, but did not burn

Involved in ignition and burned

Employee

Mobile property make

License Plate Number

H2 Mobile Property Type & Make

10 **Passenger road vehicle**
 Mobile property type

10 **Ford**
 Mobile property make

1998

Year

FL **1FYU228W0**
 State VIN Number

Local Use

Fire-Alarm Film Available

None of the information requested in this report may be used for purposes other than ignition

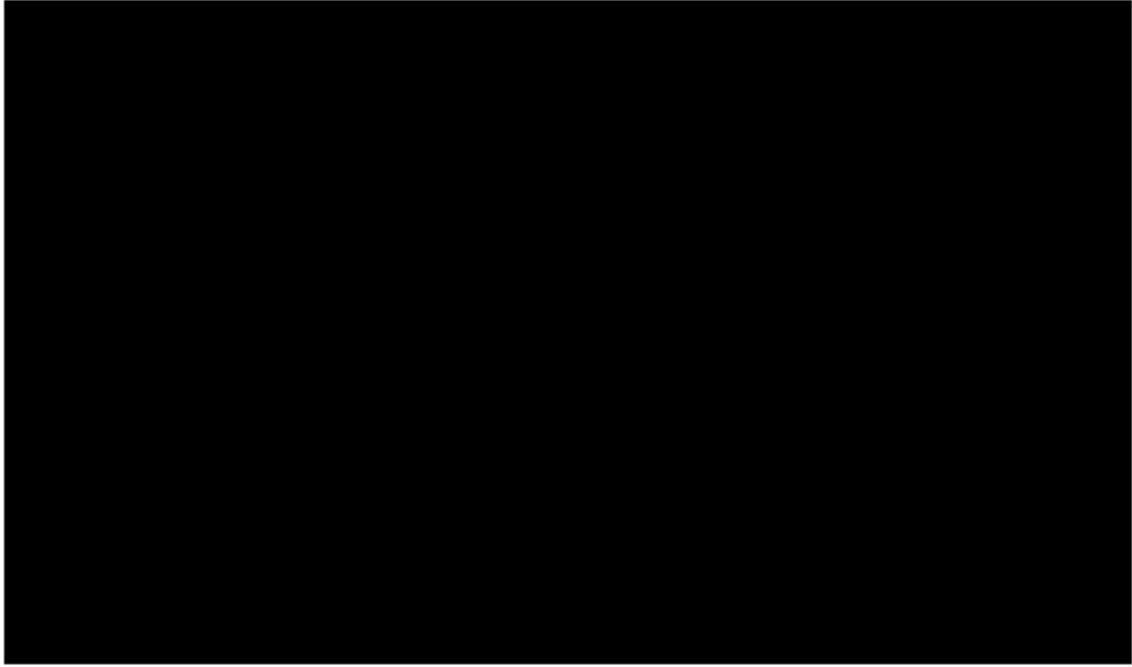
Access report attached

Police report attached

Operator report attached

Other reports attached

BR/RS-2 Revision 01/18/99



May 26, 2005

JUN 01 2005

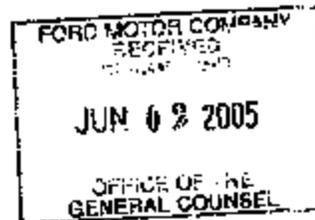


**AUTO & HOME
INSURANCE PLUS**

California Casualty
Management Company
4000 West 114th St
Suite 300
Lenexa KS 66211-9768

1(800) 346-6840

Ford Motor Company
P.O. Box 6248
Dearborn, MI 48126



RE: Our Policyholder: [REDACTED]
Our Claim Number: [REDACTED]
Date of Loss: 2/26/2005
Insurer: California Casualty Indemnity Exchange
Vehicle: 1997 Ford Expedition
VIN: IFMEU1764VL [REDACTED]

Dear Claims Department:

This is a notice of our subrogation interest in this claim. We are presently negotiating a settlement with our policyholder. Once this has been completed, we will send you our demand and documentation.

This vehicle was parked at the insured residence when it caught fire. Our examination of the vehicle has revealed that the fire originated in the engine compartment with no significant progression into the passenger compartment. The burn pattern analysis reveals the area of origin to be in front of the bulkhead on the drivers' side of the vehicle.

The vehicle, lot [REDACTED] is currently located at Copart #33 located at 12850 NW 27th Avenue in Opa Locka, Florida. We are placing you on notice that this vehicle will remain at the above address for 30 days for your inspection. After that time, the vehicle will be released for sale.

If you have any questions concerning this matter, please feel free to contact me.

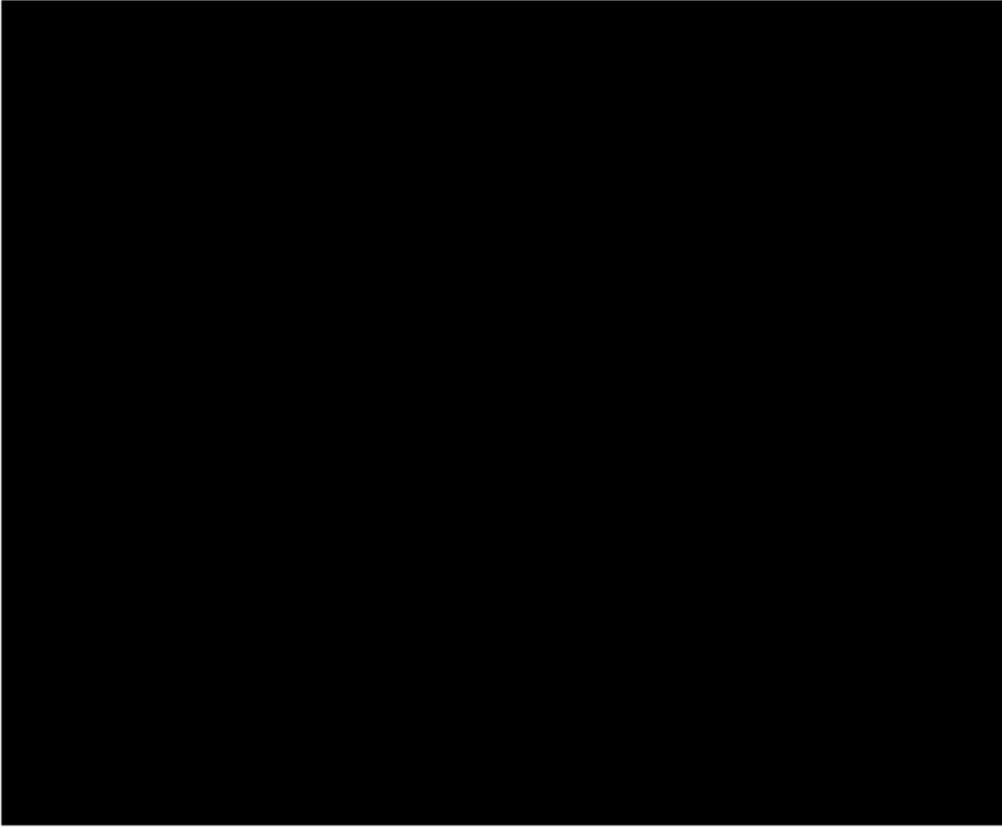
Sincerely,

Leesa Cunningham
Claims Adjuster
800.346.6840 ext. 3364

EN05-005-1C-0247

2005 JUN - 1 A 9 40

RELATIONSHIP
CENTER



BUREAU OF FIRE
PREVENTION
DIST 2
(908) 566-6803



185 HWY #34
MATAWAN, NJ, 07747
FAX (908) 566-3582

COPY

CHEESEQUAKE
Fire Department

FIRE INVESTIGATION REPORT
MOTOR VEHICLE

DATE: November 7, 1995

TIME: 1645 hrs

ALARM #: MP 104

OBPD # 32032

Owner

Leasee

Vehicle Info

First Fidelity Leasing

123 South Broad St.

Philadelphia, Pa 19108

Parlin, NJ

1996 Ford Bronco

NJ Reg: (Temp)

VIN: 1FMEU15H8T

W: [REDACTED]

Fire CO's: Madlson Park & Cheesequake

OIC: Chief Mann

HQ reported a car fire behind Gateway Mall. [REDACTED] said someone knocked on the back door of the GNC store to tell her that her new car was on fire. First on scene P/O Jarusiewicz # 156, reported a fully involved car on fire.

Fire official was called to do report, and take photo's.

INVESTIGATION [REDACTED] said the car had been picked up at Oasis Ford on Oct. 30, 1995. When he first began driving the car, he smelled something like wires burning, but he thought it may have been a "new car smell". He further stated he also smelled wires burning just before he parked the car at 4:00 PM, but could not find the cause of the smell.

The point of origin and ignition source is undetermined due to the total burn of the vehicle.

There was another car owned by [REDACTED] a 1995 Mercedes Benz NJ Reg: [REDACTED] that suffered severe radiation damage to the passenger side.

This fire is listed as accidental, no further investigation needed.

Bernard T. Cohan
Fire Official Dist.2

ER05-005-LC-0248

PLAINTIFF'S ANSWERS TO DEFENDANT'S INTERROGATORIES
[REDACTED] v. FORD MOTOR COMPANY et al.
DOCKET NO: BER-L-8554-97

1. Car was leased.
2. Car was leased from Oasis Motors on October 30, 1995.
3. New.
4. Make: Ford
Model: Bronco, two door.
Year: 1996
5. Car was leased. Manufacturers suggested retail price was \$31,780.00.
6. No.
7. Not applicable.
8. Fire consumed vehicle. See plaintiff's expert report annexed hereto as Exhibit A.
9. Not applicable.
10. Not applicable.
11. Fair market value.
12. Fair market value less damage.
13. Not applicable. Fire consumed vehicle.
14. No.
15. Vehicle was consumed by fire. See Exhibit A annexed hereto.
16. Vehicle deemed total loss.
17. Vehicle was consumed by fire.
18. Car rental reimbursement \$195.00. See Exhibit B annexed hereto.

Fire damage to Pohls' Mercedes \$6,629.00 plus \$500.00 deductible. See Exhibit C annexed hereto.

Car rental reimbursement \$180.00. See Exhibit D annexed hereto.

Towing expense \$182.00. See Exhibit E annexed hereto.

19. All parties hereto; Tom McNamara; Paul Rinear; [REDACTED]
[REDACTED] Plaintiff reserves the right to amend and supplement this interrogatory answer throughout continuing discovery.

20. Hard Facts Investigative Engineering
46 Georgia Road
Freehold, New Jersey 07728

Mr. Tom McNamara
Mr. Paul O'inear

CERTIFICATION

I hereby certify that the copies of the reports annexed hereto rendered by either treating physicians or proposed expert witnesses are exact copies of the entire report or reports rendered by them; that the existence of other reports of said doctors or experts, written or oral, are unknown to me and if such become later known or available, I shall serve them promptly on the propounding party.

L.S.

CERTIFICATION IN LIEU OF OATH

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are wilfully false, I am subject to punishment.

X _____
James May

For Confidential Property
& CASM-14

DATED: 9-12-99

**DULANEY INVESTIGATIVE SERVICES
35 FOWLER DRIVE
COLUMBUS, MISSISSIPPI 39702**

**REPORT NUMBER - ONE & FINAL
April 11, 2005**

Prepared for: Safeway Insurance Company
P. O. Box 98179
Jackson, MS 39298

Attention: Mr. Jeff Beall

Insured: [REDACTED]

Date of Loss: March 28, 2005

Loss Location: Premier Ford Dealership Columbus, MS

Claim Number: 1005782

DIS Number: 033-F-2005

*THIS CONFIDENTIAL AND PRIVILEGED INVESTIGATIVE REPORT IS
FURNISHED FOR THE EXCLUSIVE USE OF THE CLIENT.
RELEASE TO ANY OTHER AGENCY, COMPANY OR INDIVIDUAL IS THE SOLE
RESPONSIBILITY OF THE CLIENT OR THEIR DESIGNATED REPRESENTATIVE.*

ENS-865-LC-8334

ASSIGNMENT

On March 30, 2005, Mr. Jeff Beall requested a Vehicle Fire Origin and Cause Determination of 2001 Ford Expedition that caught on fire at the Ford Dealership in Columbus, Mississippi on March 28, 2005. This vehicle examination commenced on the morning of April 2, 2005.

According to [REDACTED] the insured vehicle was purchased on March 25, 2004 from Premier Ford in Columbus, Mississippi. Around three days prior to the fire, the Expedition started blowing fuses, she commented. The fuses serviced the interior lights, power windows and gearshift. The fuses were replaced but they continued to blow, she said.

On March 28, 2004, around 8:15 a.m., [REDACTED] drove the vehicle to the Premiere Ford for the warranty service repairs on the vehicle. About 8:45 a.m., while parked in the front lot, the vehicle (engine compartment) caught on fire. [REDACTED] stated that the cruise control quit working around December 2004. There were no other known problems with the vehicle and no repairs were made to the Expedition, prior to the fire.

ATTACHMENTS

- 1) Twenty photographs with an explanation sheet
- 2) Computer generated vehicle diagram
- 3) Photograph negatives

VEHICLE EXAMINATION

On April 2, 2005, at 11:00 a.m., I arrived at Henry's Wrecker Service, located on Gardner Boulevard in Columbus, Mississippi, to inspect this vehicle. The vehicle was parked in the rear compound yard. The compound yard was secured with a locked, chain link fence.

The burned vehicle was identified as a 2001 Ford Expedition; four door Sports Utility Vehicle with an eight-cylinder gasoline engine. The private vehicle identification number is 1FMRU15W01[REDACTED]. There was no license plate displayed on the vehicle.

As depicted in the enclosed photographs, this fire was confined to the engine compartment. The flames consumed a hole through the left rear section of the aluminum hood, as shown in photographs # 4, 5 & 8.

An interior passenger and cargo compartment inspection revealed light smoke and soot damage along the dash, headliner and leather seats.

Dulaney Investigative Services

35 Fowler Drive • Columbus, MS 39702 • (662) 328-0077

BR05-895-LC-0335

An engine compartment examination revealed heavy, localized fire damage in the left rear section. The intense flames destroyed the combustible components in that vicinity, some of which includes the wiring insulation, rubber hoses and the brake fluid reservoir. A distinct "V" shaped oxidation pattern extended up and away from the cruise control deactivation switch along the brake master cylinder and the bulkhead. The flames penetrated the aluminum hood directly above this area.

An inspection of the electrical and heat producing devices common to the area of fire origin did not provide visible evidence consistent with fire causation. However, the cruise control deactivation switch was positioned in the immediate area of fire origin. This switch has been known to overheat and cause electrical fires, even with the ignition switch off. It is my understanding that on January 28, 2005, the Ford Motor Company recalled some 800,000 trucks and Expeditions.

As instructed, Dr. John Owens, EE was retained to further evaluate the electric system and the cruise control deactivation switch.

On April 11, 2005, Dr. John Owens phoned and stated that he determined that the cruise control deactivation switch caused this fire.

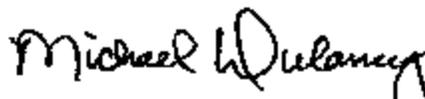
VEHICLE ORIGIN & CAUSE DETERMINATION

Based upon the physical evidence observed during the vehicle inspection, this fire originated in the left rear section of the engine compartment, at or near the cruise control deactivation switch.

COMMENTS

As instructed, this file is being closed. If further investigative analysis is needed, this file can easily be reopened. Thank you for this Vehicle Fire Origin & Cause Determination.

Michael Dulaney, Sr.

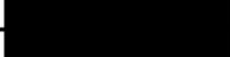


Certified Vehicle Fire Investigator
Columbus, MS
(662) 328-0077

File status: Closed

DIAGRAM SHEET

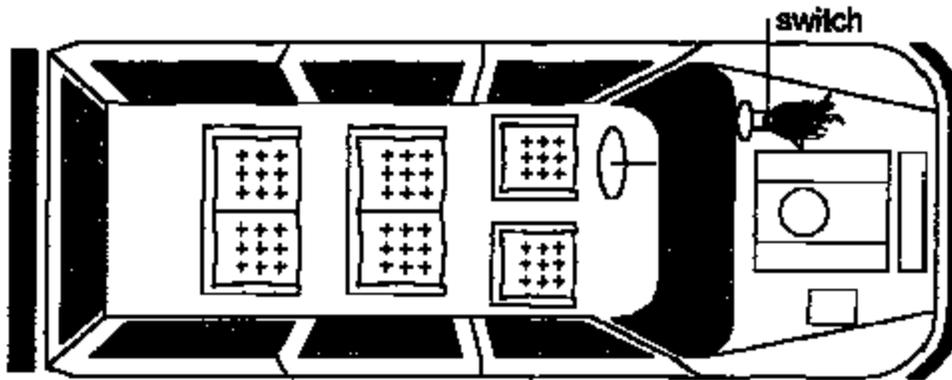
Property owner:



Location:

Hwy. 45 North Columbus, MS

Claim #



2001 Ford Expedition

Prepared by:
Mike Dulaney

Date:
04/02/05

Scale:
Not to scale

Dulaney Investigative Services
35 Fowler Drive • Columbus, MS 39702 • (662) 328-0077

ER05-005-LC-0337

PHOTOGRAPH EXPLANATION SHEET

Vehicle Photo's:

1. Front view of the Expedition.
2. Passenger side view of the vehicle.
3. Drivers side rear.
4. Driver's front side showing a hole burned in the hood.
5. Private Ford Motor Co. label and VIN on the drivers door.
6. Rear passenger compartment.
7. Front passenger compartment.
8. Under side view of the hood, showing the hole burned through it.
9. Engine compartment, view along the right side.
10. Engine compartment, view from the right side.
11. Battery.
12. Center of the engine compartment.
13. Engine compartment, view of the left side. Note the "V" oxidation patterns along the bulkhead & the brake master cylinder above the cruise control deactivation switch.
14. Closer view of the oxidation patterns near the fire origin.
15. Fire damage to the left side of the engine.
16. Cruise control deactivation switch (bottom left) and the fuse box.
17. Wiring harness on the left side of the engine, showing no arcing or beading.
18. Wiring harness at the bulkhead, showing no arcing or beading.
19. Fire damage between the radiator and engine.
20. Melted and burned components at the front of the engine.

SAFEWAY INSURANCE COMPANY

10 Canebrake Blvd, Suite 300 - Flowood MS 39232
Mailing Address: P O Box 98179 - Jackson MS 39298
Phone: (601) 936-2155 Fax: (601) 936-6701

SAFE IN EVERY WAY

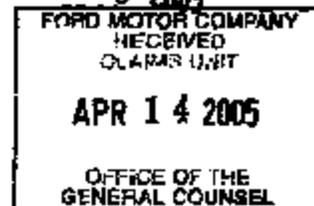


New

April 7, 2005

Shawn Norton / Legal Dept.
Ford Motor Company
(313) 845-4069

RECEIVED APR 13 2005



RE: Safeway Claim Number: [REDACTED]
Safeway Insured: [REDACTED]
Date of Loss: 3/28/05
Vehicle: 2001 Ford Expedition
VIN: 1FMRU15W01L [REDACTED]

Dear Ms. Williams,

This to follow up my phone call to your office regarding a vehicle fire that occurred on the date of loss listed above. We insure the vehicle listed above and were called upon to investigate this vehicle fire by our insured, [REDACTED]

We took a statement from [REDACTED] who stated that they had been experiencing blown fuses for the last few months. On March 28, 2005 he drove the vehicle to the Premier Ford dealership in Columbus, MS. While he was waiting to speak to representative, the vehicle started by itself then began to burn. Someone on the lot saw it and went inside and reported to them. The local police and fire departments were called to put the fire out.

The service manager asked him to have the vehicle moved from their premises because they could do nothing. The vehicle was towed to Henry's Towing located at 1423 Gardner Blvd., Columbus, MS. The phone number is (682) 329-2881.

We recently had the vehicle inspected by a fire investigator and an engineer. They both concluded that the fire appears to have begun around the cruise control module. We are aware of a recent recall by your company for the deactivation switch on the cruise control, which could short circuit causing it to overheat, burn, and smoke.

We ask that your company open a claim and send a representative to inspect the vehicle at the above listed location as soon as possible. After such inspection, please contact us with your findings.

Please call the undersigned to confirm receipt of this request.

Sincerely Yours,

Jeff Beal
Claims Adjuster

ENR5-005-LO-0039

ISSUE LIST

Last Handling Date/ Issue Status	Name/ Reason Desc	Vin/ Case No.	Model Year and Vehicle Line	Issue Type
4/20/2005 CLOSED	[REDACTED] AWA - CAC SUPPORTS FIELD'S DECISION	1FMRU15W01[REDACTED] 573100885	2001 EXPEDITION	02
4/11/2005 CLOSED	[REDACTED] AWA - CAC SUPPORTS FIELD'S DECISION	1FMRU15W01[REDACTED] 573100895	2001 EXPEDITION	02
4/4/2005 CLOSED	[REDACTED] LEGAL - ACCIDENT / FIRE	1FMRU15W01[REDACTED] 573100895	2001 EXPEDITION	07

ENR-005-LC-0340

All Action Details for Issue

Print

VIN: 1FMRU15W0[REDACTED] Year: 2001 Model: EXPEDITION Case: 573100895
 Name: [REDACTED] Owner Status: Subsequent WSD: 2001-08-25
 Symptom Desc: FIRE/SMOKE SCORCHED/BURNT UNDERHOOD Primary Phone: [REDACTED]
 Reason Desc: AWA - CAC SUPPORTS FIELD'S DECISION Secondary Phone: [REDACTED]
 Issue Type: 02 INFORMATION Issue Status: CLOSED

Action: CB-SUPPORT DEALERSHIP'S/REGION'S POSITION Origin Desc: US CONCERN CASE BASE
 Dealer: 05828 PREMIER FORD L-M INC
 Odometer: 1 MI Comm Type: PHONE
 Analyst Name: GREAVES JOVAMIE Analyst: JGREAVE4
 Action Date: 04/20/2005 Action Time: 10.35.55.971 Action Data: No

Comments CUSTOMER SAID: - VEH CAUGHT ON FIRE AND INSURANCE COMPANY CONTACTED FORD FOR FURTHER INVESTIGATION- FORD RESPONDED STATING NOTHING FURTHER WOULD BE DONE- HUSBAND RECEIVED A LETTER FROM FORD ALSO, IT INDICATED NO RECALLS ON VEH- VEH IS A NON-FORD SHOP, HAVE JUST BEEN NOTIFIED BY THE SHOP THAT FORD CALLED THEM ADVISING THAT VEH COULD NOT BE MOVED UNTIL IT WAS INSPECTED BY FORD- WOULD LIKE TO KNOW WHEN THIS INSPECTION WILL TAKE PLACE..... HAS BEEN A FEW WEEKS OR SO AND NO ACTION TAKEN... DEALER SAID: PREMIER FORD L-M INC 2120 HIGHWAY 45 NORTH COLUMBUS, MS 39705(882) 327-3873 CRC ADVISED: THANK YOU FOR CONTACTING FORD MOTOR COMPANY IN REGARDS TO THIS ISSUE. OUR RECORDS INDICATE THAT A DECISION HAS BEEN MADE AND THE CRC CAN NOT OVERTURN THIS DECISION. HOWEVER, TO ENSURE OUR RECORDS ARE COMPLETE WE HAVE DOCUMENTED YOUR FEEDBACK. (NOTE TO CSR: SUPPORT DLV REGION DECISION.) - NO EVIDENCE SUPPORTING WHAT THE NON-FORD SHOP AND ADVISED CUST... CRC WOULD BE UNABLE TO PROVIDE ANY DIRECTION ON THIS MATTER... ACCORDING TO RECORDS, NO FURTHER ACTION TO BE TAKEN BY FORD- WOULD RECOMMEND CUST EITHER CLARIFY WITH NON-FORD SHOP WHAT WAS STATED OR SPEAK WITH INSURANCE COMPANY FOR SUGGESTED NEXT STEPS.

ENG-085-10-0341

All Action Details for Issue

Print

VIN: 1FMEHLSM11[REDACTED] Year: 2001 Model: EXPEDITION Case: 573100895
 Name: [REDACTED] Owner Status: Subsequent WSD: 2001-08-25
 Symptom Desc: GENERAL INQUIRIES REQUEST/NON-VEHICLE RELATED Primary Phone: [REDACTED]
 Reason Desc: AWA - CAC SUPPORTS FIELD'S DECISION Secondary Phone: [REDACTED]
 Issue Type: 02 INFORMATION Issue Status: CLOSED

Action: CB-SUPPORT DEALERSHIP'S/REGIONS POSITION Origin Desc: US CONCERN CASE BASE
 Dealer: 05828 PREMIER FORD L-M INC
 Odometer: 67000 MI Coaxial Type: PHONE
 Analyst Name: MULZAC,WAYNE Analyst: WMULZAC
 Action Date: 04/11/2005 Action Time: 14.00.25.314 Action Data: No

Comments CUSTOMER SAID: CALLING BACK ABOUT SAME ISSUE - DO NOT THINK THAT ANYONE HAS REVIEWED THIS
 ISSUE CORRECTLY.CRC ADVISED: THANK YOU FOR CONTACTING FORD MOTOR COMPANY IN REGARDS TO THIS ISSUE.
 OUR RECORDS INDICATE THAT A DECISION HAS BEEN MADE AND THE CRC CAN NOT OVERTURN THIS DECISION.
 HOWEVER, TO ENSURE OUR RECORDS ARE COMPLETE WE HAVE DOCUMENTED YOUR FEEDBACK. (NOTE TO CSR:
 SUPPORT DLV/REGION DECISION.)

2005-000-1C-0342

All Action Details for Issue

Print

VIN: 1FEMJ15W0J [REDACTED] Year: 2001 Model: EXPEDITION Case: 573100895
 Name: [REDACTED] Owner Status: Subsequent WSD: 2001-08-25
 Symptom Desc: FIRE/SMOKE SCORCHED/BURNT UNDERHOOD Primary Phone: [REDACTED]
 Reason Desc: LEGAL - ACCIDENT / FIRE Secondary Phone: [REDACTED]
 Issue Type: 07 LEGAL Issue Status: CLOSED

Action: ADVISE CUST INFORMATION WILL BE SENT TO CONSUMER AFFAIRS - FIRE
 Dealer: 05928 PREMIER FORD L-M INC Origin Desc: US CONCERN CASE BASE
 Odometer: 67000 MI Comm Type: PHONE
 Analyst Name: MARSHA MARSHALL Analyst: MMARSH27
 Action Date: 03/30/2005 Action Time: 15.55.10.222 Action Data: No

Comments CUSTOMER SAID: - CUST WAS LISTENING TO THE INFO ABOUT THE RECALL ON THE EXPEDITIONS CATCHING ON FIRE AND HIS CAUGHT ON FIRE ON MONDAY - VEH WAS TAKEN TO THE FORD DLRSHIP FOR A SPARK KNOCK - WHILE THE VEHICLE WAS AT THE DLRSHIP THE ENGINE CATCH FIRE UNDER THE HOOD - DLR COULD NOT TELL HIM WHAT WAS WRONG BECAUSE ALL THE WIRES WERE BURNT UP - DLR TOLD THE CUST TO CONTACT HIS INSURANCE COMPANY AND HE DID - - CNA IS THE ESC CARRIER THAT IS ON THE VEHICLE - CNA COMPANY WILL NOT COVER REPAIRS - CUST WANTS TO KNOW WHY THE ESC WILL NOT COVER REPAIRS - FIRE CONCERN - DEALER SAID: PREMIER FORD L-M INC 2120 HIGHWAY 45 NORTH COLUMBUS, MS 39705 TEL: (662) 327-3873 FAX: (662) 327-4224 CRC 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: MAKE OUTBOUND CALL TO DEALER
 Dealer: 05928 PREMIER FORD L-M INC Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION
 Odometer: 67000 MI Comm Type: PHONE
 Analyst Name: DUNLAP, KENISHA Analyst: KDUNLAP
 Action Date: 04/01/2005 Action Time: 13.13.48.324 Action Data: No

Comments LPA CONTACTED DLR SVC MGR. HE WAS UNAVAILABLE. LPA LEFT A MSG.

Action: INFORMATIONAL CALL/FAX
 Dealer: 06928 PREMIER FORD L-M INC Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION
 Odometer: 67000 MI Comm Type: PHONE
 Analyst Name: DUNLAP, KENISHA Analyst: KDUNLAP
 Action Date: 04/01/2005 Action Time: 13.14.08.774 Action Data: No

Comments LPA CONTACTED CUSTOMER. SHE WAS NOT AVAILABLE. LPA LFT MSG.

Action: DENY ASSISTANCE - BEYOND WARRANTY
 Dealer: 05928 PREMIER FORD L-M INC Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION
 Odometer: 67000 MI Comm Type: PHONE
 Analyst Name: DUNLAP, KENISHA Analyst: KDUNLAP
 Action Date: 04/04/2005 Action Time: 09.40.25.147 Action Data: No

Comments LPA CONTACTED DLR SVC MGR MIKE FITES. MIKE STATED THAT CUSTOMER'S VEHICLE WAS PARKED IN THE FRONT OF THE DLR. THE VEHICLE WAS NEVER IN THE SVC DEPT. WHILE THE VEHICLE WAS PARKED IN THE FRONT LOT, A THERMAL EVENT OCCURRED. THERE ARE NO RECALLS OR RELATED REPAIR HISTORY, AND THE VEHICLE IS BEYOND WARRANTY. NOTHING FURTHER. CLOSING CORRESPONDENCE MAILED. CASE FILED.

EPO5-005-1C-0343

PHOTOGRAPH SHEET



No. 1



No. 2

Page 1

PHOTOGRAPH SHEET



No. 4

PHOTOGRAPH SHEET



No. 5



No. 6

Page 3

PHOTOGRAPH SHEET



No. 7



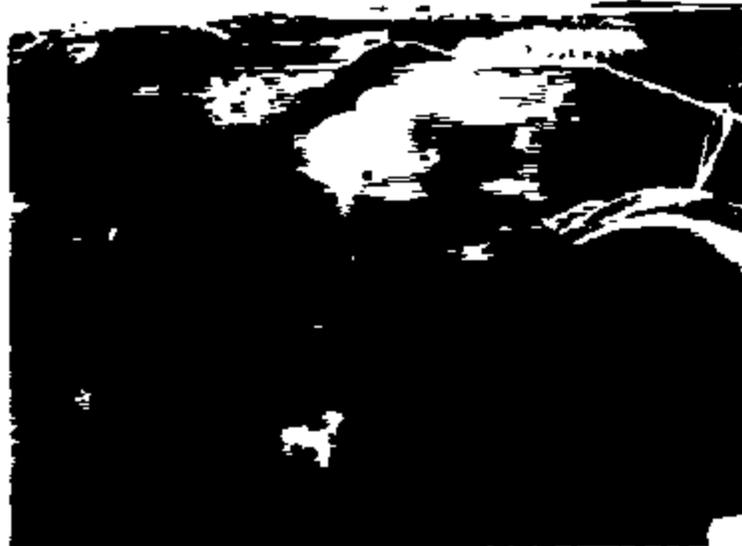
No. 8

Page 4

PHOTOGRAPH SHEET



No. 9



No. 10

Page 5

PHOTOGRAPH SHEET



No. 11



No. 12

Page 6

PHOTOGRAPH SHEET



No. 13



No. 14

Page 7

EA03-005-LC-0330

PHOTOGRAPH SHEET



No. 15



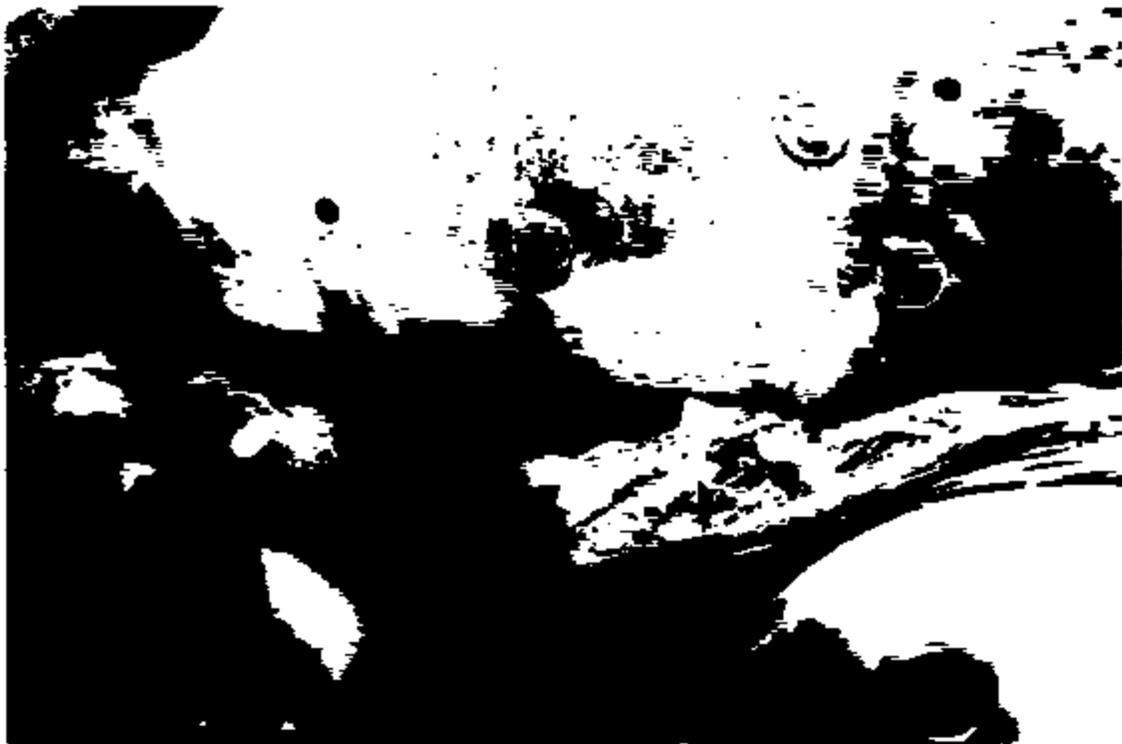
No. 16

Page 2

PHOTOGRAPH SHEET



No. 17



No. 18

Page 9

PHOTOGRAPH SHEET



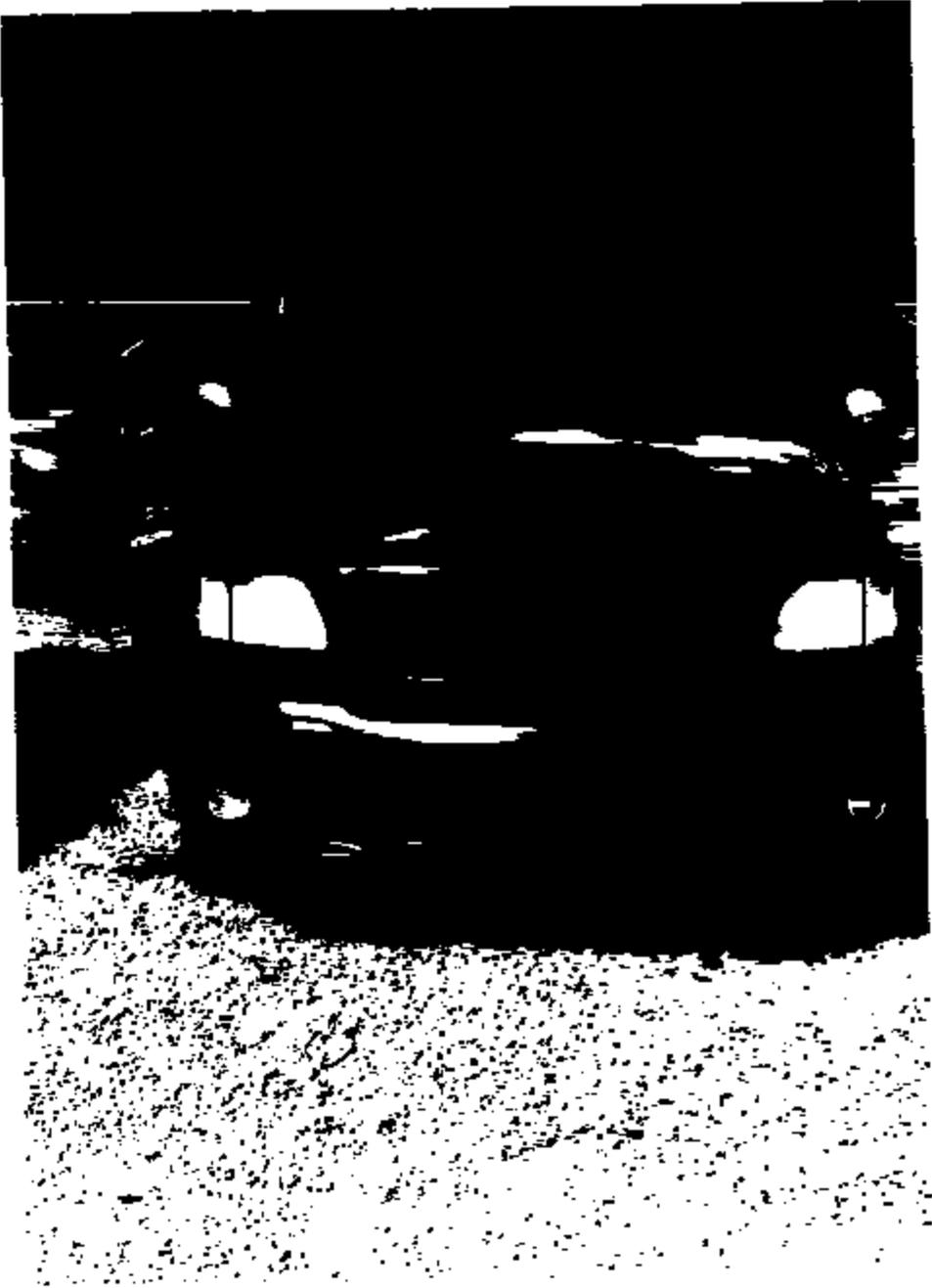
No. 19



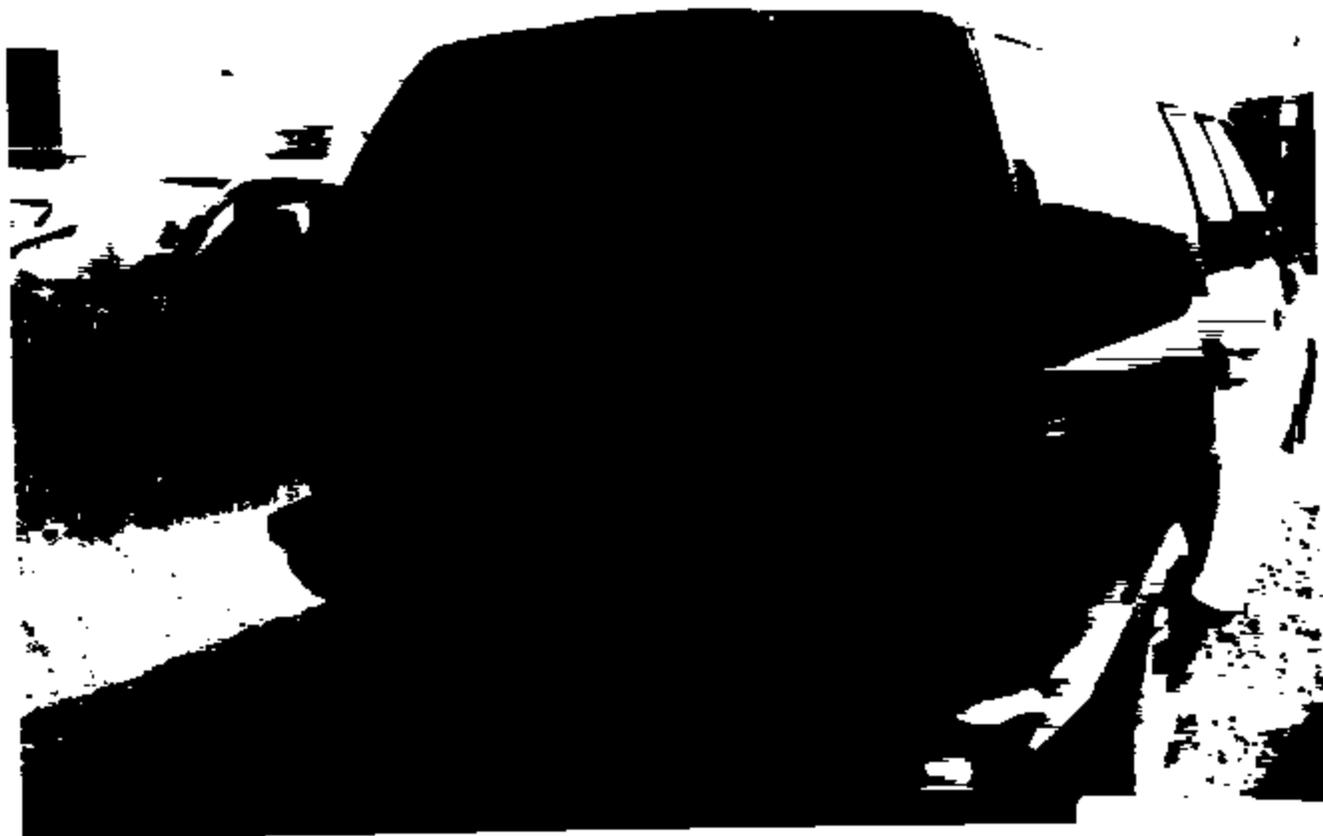
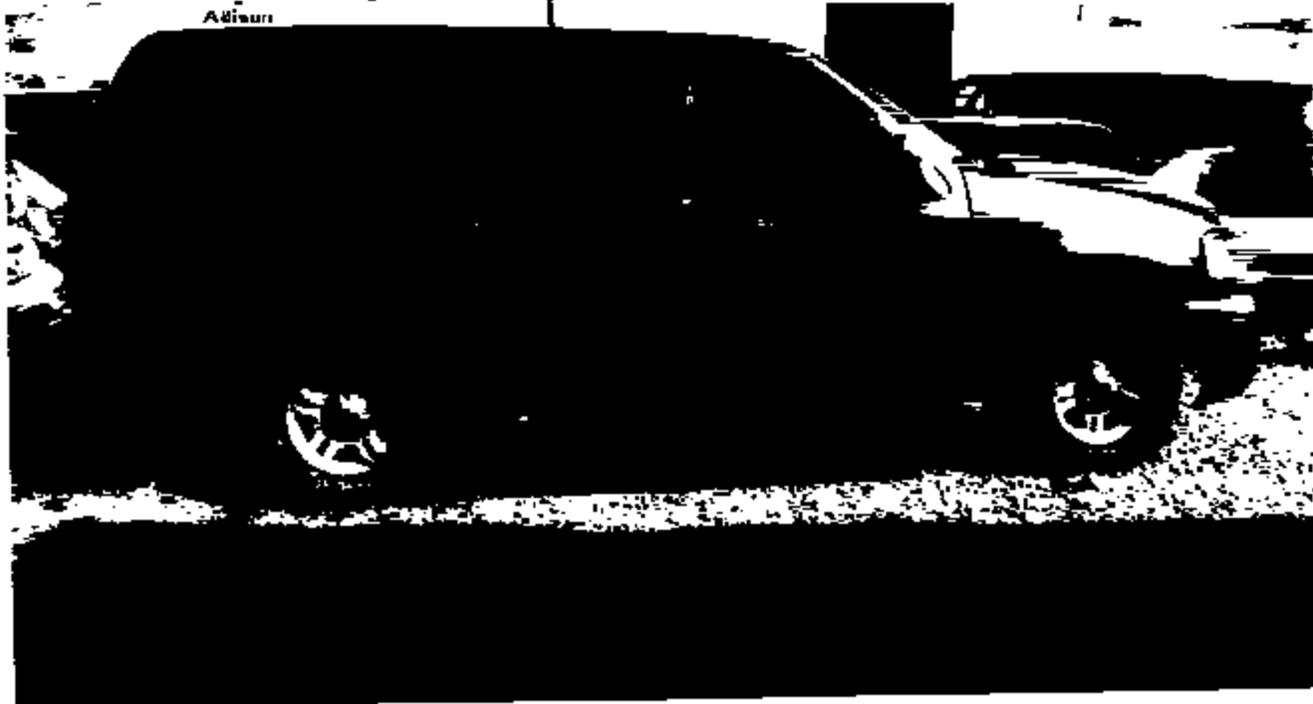
No. 20

ER05-085-10-0013

Page 10



EA05-885-LC-9354



EA65-865-LC-8395









EN05-005-LC-0359

DATE: 03/01
 FRONT ENGINE: 3300LA ENGINE: 62/90LA/300000
 145100 170900 REAR ENGINE: 3300LA
 P285/70R14SL WHT 170900
 1607 UJ TRES P285/70R14SL
 AT 207 lbs/20 PSI COLD AT 241 lbs/35 PSI COLD

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

NO. 1 FAMILY SUPPORT
 TITLE: N/A

ROAD TO 450



EXT. ENG: 33
 NO. 4 WT. 1700 1700 1700 1700
 119 4 17 17 17 17

1201100010299 UTC 9 78581520072 NO



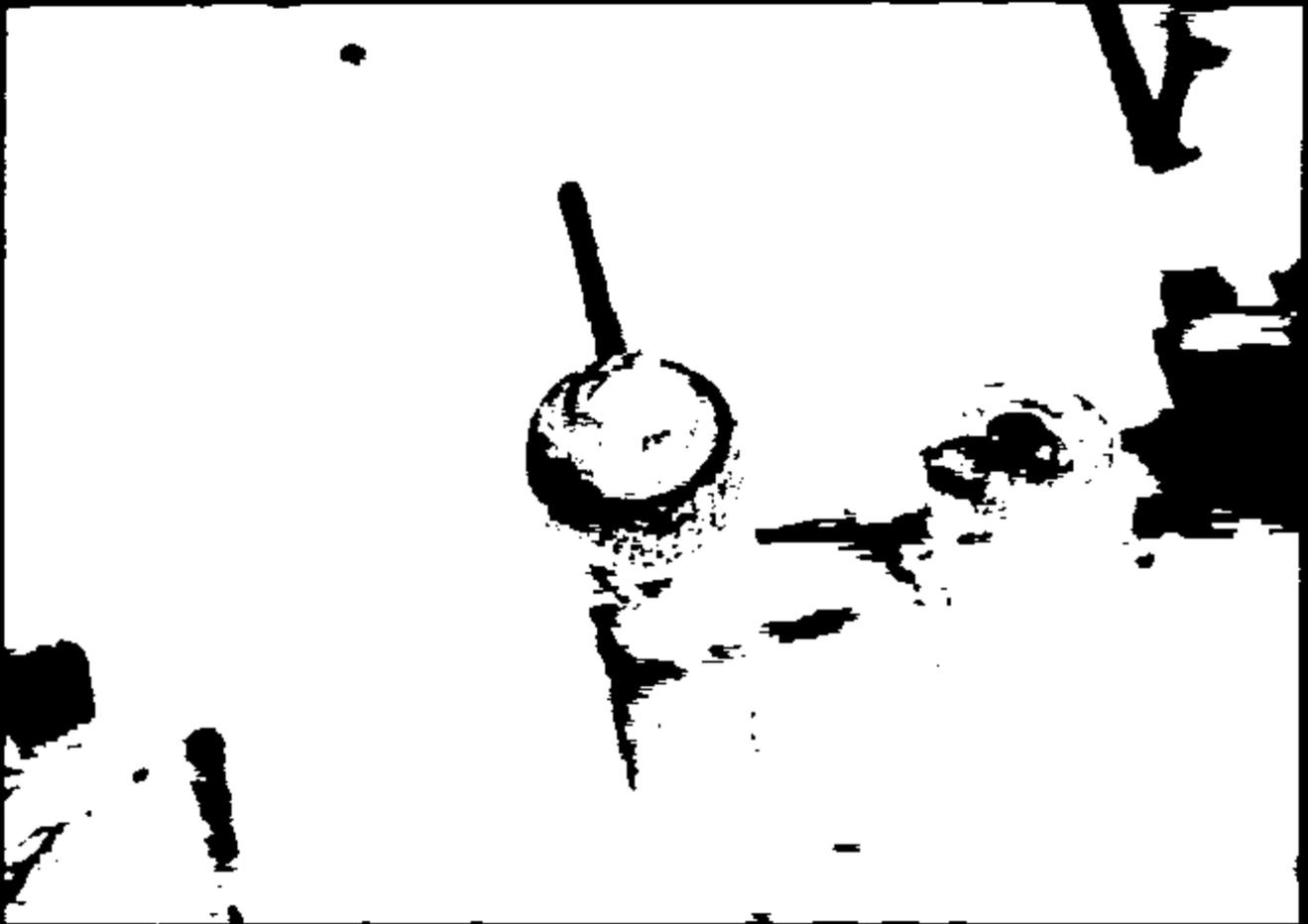
ER05-605-LC-9381



ER05-005-LC-0362



ERG-885-LC-8283







ERCS-885-LC-8367



ER05-005-LC-9364



MAY 03 2005

RV APPRAISALS & INVESTIGATIONS OF AMERICA, LLC

Thomas G. Bailey CFI
President, Sr. Investigator
407 Dorchester Square
Lake Mary (Orlando), Florida 32746

Member of:
International Association of Marine Investigators
Society of Professional Insurance Investigators
International Association of Arson Investigators
Florida Advisory Committee on Arson Prevention

Telephone (407) 688-9800
Fax (407) 688-0606
<http://www.rvappraisals.com>
<http://www.rvinvestigations.com>
email: tgbaily@rvappraisals.com

SENT BY CERTIFIED MAIL #7000 1670 0010 9621 5179

April 28, 2005

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

FORD MOTOR COMPANY
RECEIVED
MAY 03 2005
OFFICE OF THE
GENERAL COUNSEL

RE: Lance Smart Ford Explorer Fire
Our case number: PR-I-270-0405
Date of loss: 04/21/05
Chassis number: 1FMYU22E5WU [REDACTED]
Progressive Insurance Company claim # [REDACTED]

To Whom It May Concern:

I have been retained by Progressive Insurance Company to conduct the Origin & Cause investigation on a fire damaged Ford Explorer truck. The preliminary indication is that the fire originated in the engine area when the engine was off. We are requesting that a representative from Ford Motor Company be present at the inspection of the truck. Be advised that invasive exploration of the vehicle is in order to determine the precise cause.

I am providing you the following information relative to your attendance in the investigation of the Ford truck fire. It will be your responsibility to notify your designated representatives. Any items removed will be tested on site if possible. If testing cannot be performed, RV Appraisals & Investigations of America, LLC will retain those items until such time as an independent source of testing is available.

Please direct any request for information or copies of investigation reports to:

Pete Nicholich SIU
Progressive Insurance Company

address ↓

ER05-085-LC-9368

6100 Old Park Lane, Suite 150
Orlando, Florida 32835

Please direct any inspection coordination request to RV Appraisals & Investigations of America, LLC at the above address.

Date of Inspection: May 19, 2005

Time: 10:00 am EST

Location: Adesa Auto Auction, 2500 Adesa Drive, Sanford, Florida 32773, 407-323-4090, Ext. 120 or 111

Please advise by email or letter to RV Appraisals & Investigations of America, LLC as to whether you will be attending.

Sincerely,



T.G. Bailey
Certified Fire Investigator

WILLIAMS FIRE DISTRICT
WILLIAMS FIRE DEPARTMENT
25 Sumner Williams Road
Willmar, Ala 36387

INVESTIGATION NUMBER 1021173

CALL NUMBER 211060 TYPE OF ALARM

Received	<u>1216</u>	House
Dispatched	<u>1216</u>	Mobile Home
Arrived	<u>1217</u>	School/Church
Engine	<u>1220</u>	Industrial
Service	<u>1258</u>	Haz/Utility
		Grass/Woods
		Vehicle/Park
		Vehicle Accident
		Extrication-Jamb
		Power Lines Down
		Haz/Mat Incident
		Medical
		False Alarm
		Other

INVESTIGATION: () Yes () No

PROPERTY ADDRESS

Section 27 Township 3 S Range 4 W

VIN OWNER: Vehicle

VIN NUMBER: Undetermined

PROPERTY OWNER

Name

Address

City Willmar State Ala

Phone No.

RECEIVED BY

Name

Address

City

Phone No.

INSURANCE () Yes (X) No

Insurance Agency

Agent

Address

City

Phone No.

Fax No.

Net Building Value

Net Content Value

FIRE DAMAGE TO OTHER PROPERTY: () Yes (X) No

FROM FIRE DEPARTMENT NOTIFIED: () Yes (X) No

Date Notified

FIRE CREW OPERATIONS

Hydrant Location:

HOW MANY USED: () Yes (X) No

HOW USED

Engine	Quantity	Pressure	Supply Line	WELLS USED
Eng 18		ft	ft (750)	
Eng 19	<u>✓</u>	ft	ft (300)	<u>300</u>
Eng 20		ft	ft (300)	
Eng 21		ft	ft (300)	
Eng 22		ft	ft (300)	
Eng 23		ft	ft (300)	
Eng 24		<u>150</u> ft	ft (1000)	<u>700</u>
Tanker 25	No. of Loads		(2000 Gals)	
Tanker 26	No. of Loads		(2000 Gals)	

Total Gallons 1000

PROPERTY DAMAGE

Generator	()	Head Crane	(X)	Flags
Hand Lights	()	Pole Pole	(X)	Saws
Scene Lights	()	Bolt Cutter	()	SCBA
Jamb	()	Fry Bar	()	Ventilator
Cutter	()	Ladder	()	GC/CP
Rope	()	Rope	()	Splices
Port-A-Power	()	Sho	()	Sandbags
Maligan	()	Chain	()	Cypress
Gen-a-Jug	()	Cribbing	()	Life Pak

Signature of Person Reporting

Date

Time

Time

ALARM NOTIFIED () Yes (X) No

REQUESTED () Yes (X) No

SUSPENDED () Yes (X) No

WEATHER CONDITIONS

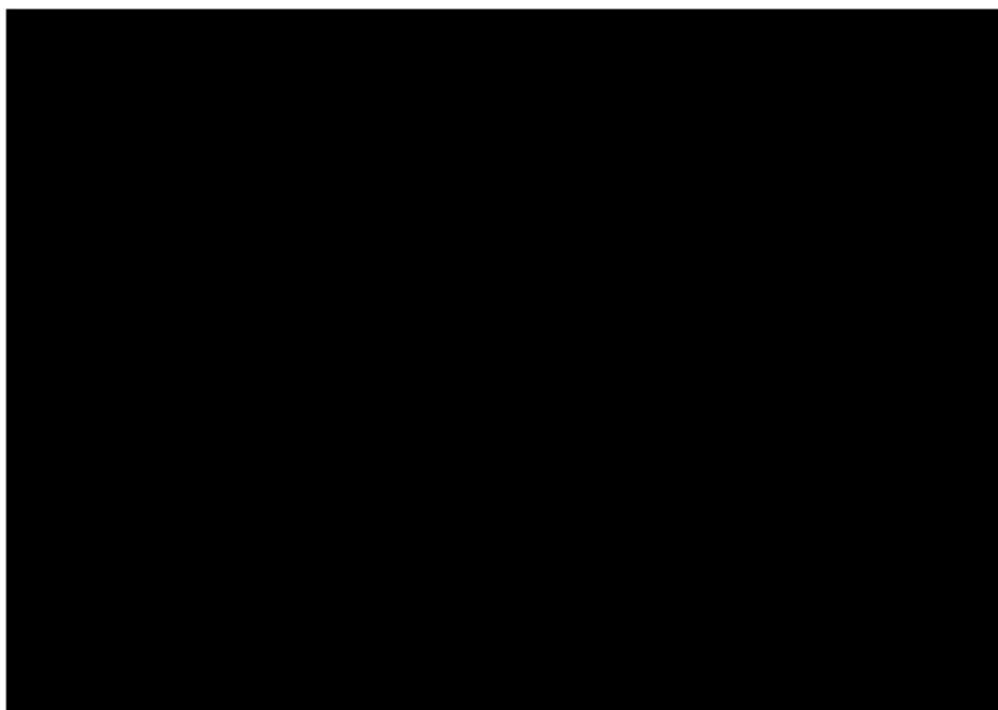
Temp 60 Humidity 60 Dry ✓ Raining

Wind Speed 6 Direction NW

ENG-001-LC-8370



ER05-005-LC-9371



II.

Plaintiff's Original Petition was served upon Defendant on January 8, 2001, making January 29, 2001, the due date for Defendant's Original Answer. Therefore, this Third-Party Petition is being filed without prior leave of Court on or before February 28, 2001, according to the terms of T.R.C.P. 38.

III.

██████████ Plaintiff, filed suit in this cause alleging damages as the result of an incident which occurred on or about February 17, 1999, alleging that Third-Party Plaintiff is liable to Plaintiff under theories of negligence, strict liability, breach of implied and express warranties, negligent misrepresentation, and violations of the Texas Deceptive Trade Practices Acts ("DTPA"). All of these allegations arise out of a fire allegedly caused by a vehicle purchased from Third-Party Plaintiff on or about November 2, 1998. A true and correct copy of Plaintiff's First Amended Original Petition is attached hereto as "Exhibit A".

IV.

Ford and Legend are liable to Third-Party Plaintiff for indemnity for any and all sums it may be required to pay to Plaintiff as a result of the incident made the basis of this suit. In this connection, Third-Party Plaintiff will show that at all times material to this suit it has been engaged in retail sales of vehicles such as the one purchased by Plaintiff. The vehicle that is the basis of this lawsuit was manufactured and designed by Ford, and sold by Ford to Legend. Legend made extensive modifications to the vehicle and then sold it to Third-Party Plaintiff. Third-Party Plaintiff made no modifications to the vehicle before selling it to Plaintiff. Plaintiff alleges, among other things, that the vehicle was defective at the time it was purchased by Plaintiff. Third-Party Plaintiff will show that it innocently resold the vehicle to Plaintiff in the ordinary course of its retail business without knowledge or the means of acquiring knowledge of any alleged product defects.

V.

Further, Third-Party Plaintiff denies that it was guilty of any acts or omissions contributing to or independently causing the harm complained of by Plaintiff. Consequently, Third-Party Plaintiff is entitled to judgment over against Ford and Legend for indemnity for any and all sums for which it may be adjudged liable to Plaintiff. Furthermore, Ford has a statutory obligation under Chapter 82 of the Texas Civil Practices & Remedies Code to indemnify and hold harmless Third-Party Plaintiff from any loss arising out of this lawsuit, including court costs, reasonable expenses and reasonable attorneys' fees.

VI.

In the alternative, in the unlikely event that the trier of fact determines that Third-Party Plaintiff is in any way liable to Plaintiff as alleged in Plaintiff's First Amended Original Petition, then Third-Party Plaintiff is entitled to contribution from Ford and Legend pursuant to Chapter 33 of the Texas Civil Practices & Remedies Code.

VII.

REQUEST FOR DISCLOSURE

Ford and Legend are hereby requested to disclose, within 50 days of service of this Defendant's Original Third-Party Petition With Request for Disclosure, the information or material described in Rule 194.2 (a) - (k).

WHEREFORE, PREMISES CONSIDERED, Third-Party Plaintiff prays that Ford and Legend be cited to appear and answer, and that following hearing hereof, Third-Party Plaintiff be granted the relief hereinabove requested, together with all costs of court, reasonable expenses and attorneys' fees, pre-judgment and post-judgment interest at the highest rates allowable by law, and such other and further relief, whether general or special, both at law and in equity, to which it may show itself justly entitled.

Respectfully submitted,



ROBERT E. YATES
State Bar No. 22144100
2110 Walnut Hill Lane, Suite 160
Irving, Texas 75038
Phone: (972) 580-1249
Fax: (972) 714-0963

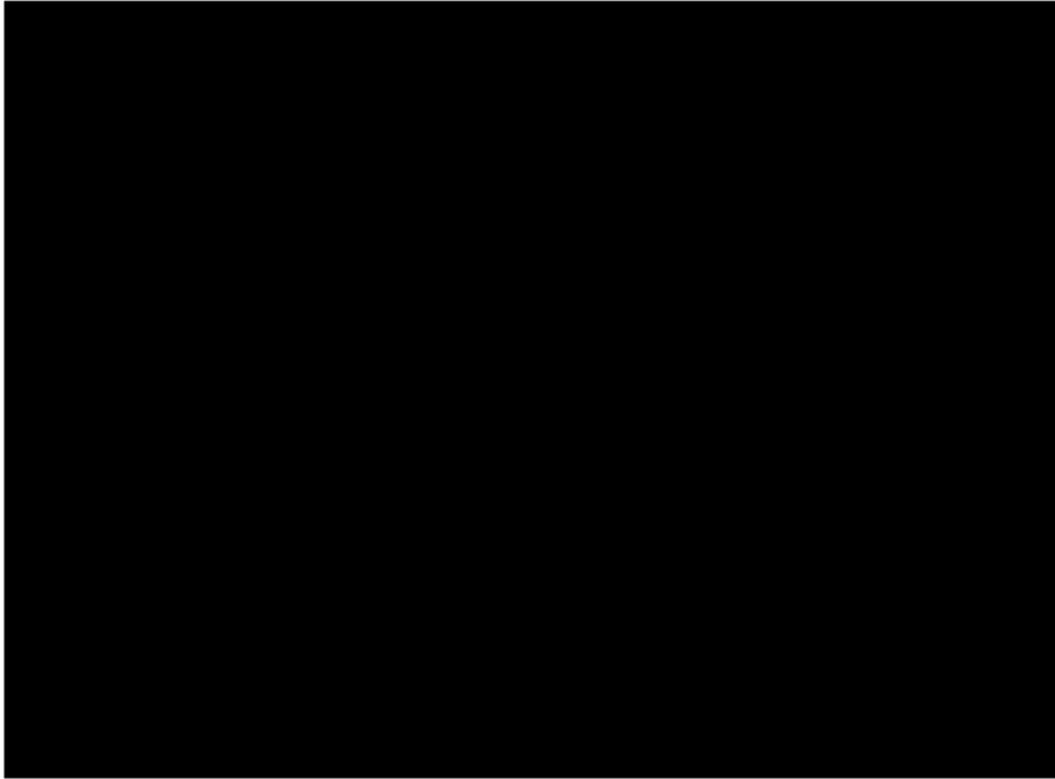
ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Defendant's Original Answer has been mailed to Anne L. Cook, Cozen and O'Connor, 1717 Main Street, Suite 2300, Dallas, Texas 75201, Attorney of Record for Plaintiffs, this 27th day of February, 2001.



ROBERT E. YATES





SPENCER CONSULTING SERVICES

P.O. BOX 797, Marion, Ohio 43301

Telephone 1-800-686-8837 (740) 389-3817 Fax (740) 389-3818

*Ms. Amy Hamilton
Grange Insurance
P.O. Box 945
Findlay, OH 45839*

*Fire Analysis
1999 Ford Ranger
VIN: 1FTZR15X3X [REDACTED]
Insured: [REDACTED]
Grange File: 711-351249
SCS File: 00-2376*

*Date of Occurrence: July 6, 2000
Reported at Approximately: P.M. Hours*

**THIS IS A CONFIDENTIAL COMMUNICATION
BETWEEN AGENT AND PRINCIPAL**

ER05-005-LC-8376

INTRODUCTION

Spencer Consulting Services was requested on July 10, 2000, by Ms. Hamilton, to conduct an investigation into the origin and cause of the captioned vehicle fire loss.

SCS Fire investigator Rick Spencer traveled to *Osborn Towing* in Kenton, Ohio on July 10, 2000. The involved vehicle was photographed exactly as found, a systematic examination conducted, and fire patterns analyzed. Preliminary results were conveyed to Ms. Hamilton. Mr. Ken Berchak, representing KB Engineering, was contacted.

VEHICLE

A 1999 Ford Ranger was located and examined, exterior views are depicted in figures 1 through 4. The vehicle identification number 1FTZR15XJX [REDACTED] was located on the lower driver side dashboard, figure 5. The number and letter combination corresponded with that provided by [REDACTED]

Tires: A review of the vehicle exterior found all four tires and rims had been damaged by flame activity, figures 6 through 9. Four remains of tires were found in the truck bed, figure 10. Examination found the tread patterns were similar and in new condition. Name brand could not be established.

Hood: The hood was replaced to the engine compartment, figure 11. The burned and melted sections were representative of a distinct burn pattern. Patterns of this type often assist investigators in the identifying of fire origins. The burn patterns indicated a progression of flame activity from the engine compartment to the inner surface of the hood sheet metal. Melting resulted.

ENGINE COMPARTMENT

Examination began by photographing from an overhead view, figure 12. Additional views from the driver side and passenger side were photographed, figures 13 and 14. It was apparent the engine compartment sustained damages from flame activity stemming from the engine location. The fuel delivery system at the top of the engine revealed burn patterns that when compared to the hood interior surface revealed a progression of flame activity from the fuel regulator and return hose.

PASSENGER AND CARGO COMPARTMENTS

Flame progression continued to the passenger compartment, figure 15. Various openings in the firewall, including the heater core opening, permitted the passage of smoke, heat, and flames from the engine compartment to the passenger compartment, figures 16, 17, and 18. Once the window glasses failed, flame activity continued to the cargo bed, figure 19.

ANALYSIS

The area of origin was established as the engine compartment. Examination of electrical wires inside the engine compartment ruled them out as contributing a cause to the subject fire. The heater core opening, power steering pump, alternator, distributor, master cylinder, and top radiator hose all revealed burn patterns indicating a progression of flame activity from the engine top as illustrated in figure 20.

Mr. Ken Berchak, P.E. was contacted and requested to conduct an independent systematic examination of the subject vehicle. After Mr. Berchak's examination, he reported his findings verbally to Investigator Spencer. Through two (2) independent investigations it has been determined the subject fire started at the fuel regulator and associated non-metallic flexible return fuel line. Mr. Berchak will provide a separate report inclusive of his findings.

In summary, the subject fire resulted when atomized (*pressurized*) gasoline escaped from a non-metallic flexible return fuel hose and entered the engine compartment. A random spark from inside the engine compartment cannot be ruled out as an ignition factor.

SECURITY

Mr. Mark Stevens reported to Grange Insurance that he was operating the vehicle at the time of the subject fire. He was heading east on a township road in Hardin County, Ohio when the fire occurred. SCS Fire Investigator Rick Spencer examined the fire loss site as identified by Mr. Stevens. No evidence of flammable liquids being poured on the road surface or adjacent ground covering, to further aid in the progression of flame activity, could be found. It was apparent the subject fire was not the result of an intentional human act.

EVIDENCE

1. Photographs: Twenty color photographs are included with this report.
2. Vehicle: The involved vehicle has been retained for future reference.
3. Mechanical: A separate analysis report, detailing the mechanical aspects of the subject fire, will be submitted by Mr. Ken Berchak, P.E., KB Engineering.

CONCLUSIONS

Based on a systematic examination of the involved vehicle and photographic survey, as outlined in this report and information available, it is Spencer Consulting Services' opinion that:

1. The area of origin was the engine compartment.
2. The point of origin was a non-metallic flexible fuel return hose at the fuel regulator.
3. Atomized gasoline escaped the flexible fuel return hose and entered the engine compartment. A random spark cannot be ruled out as an ignition factor.

This report concludes the investigation into the origin and cause of the captioned fire loss. Should you have any questions or require further clarification, please contact Spencer Consulting Services.

Report Prepared by:

Rick Spencer / s

Rick Spencer, CFL, CFEI

Certified Fire Investigator: IAAI-01-039

Certified Fire and Explosion Investigator: NAFI-1127

Licensed Investigator: Ohio-6510

August 10, 2000

CL: 711-351249
SCS File: 00-2376
RDS le

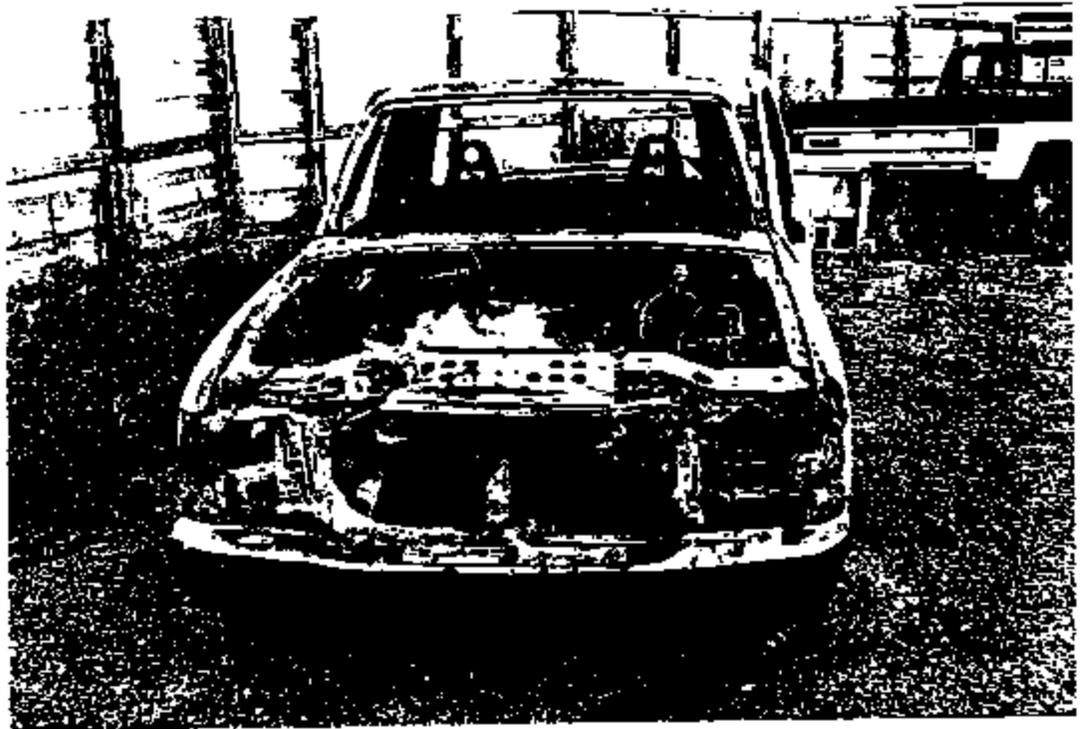


Figure 1
Front View

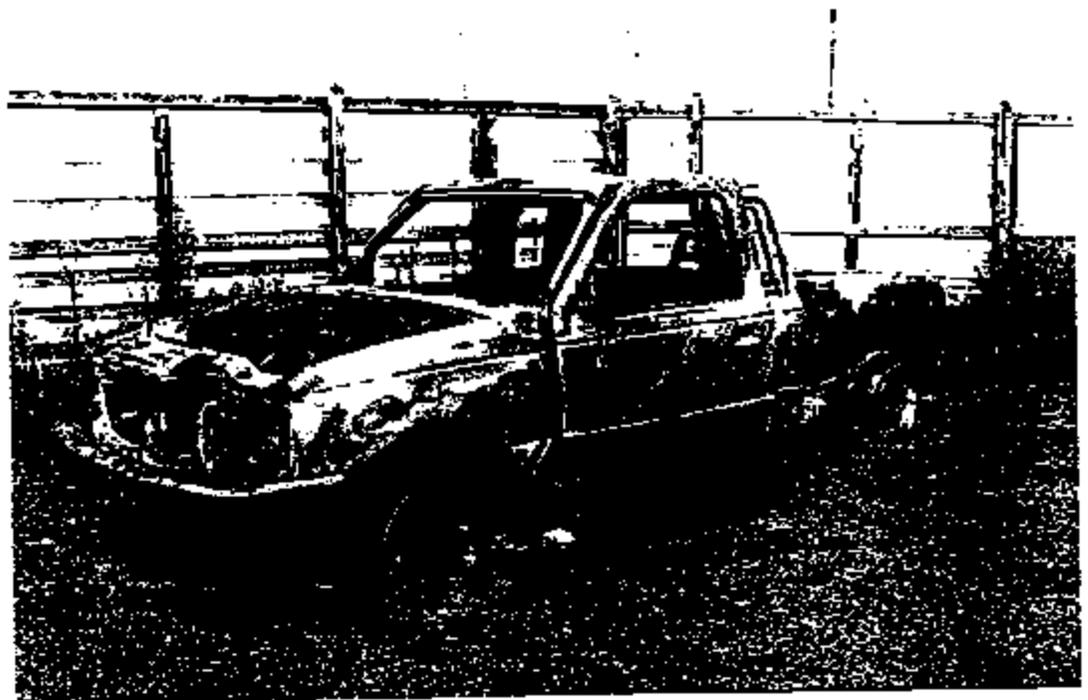


Figure 2
Driver Side View



Figure 3
Rear View



Figure 4
Passenger Side View



Figure 5
Vehicle Identification Number



Figure 6
Driver Front Tire

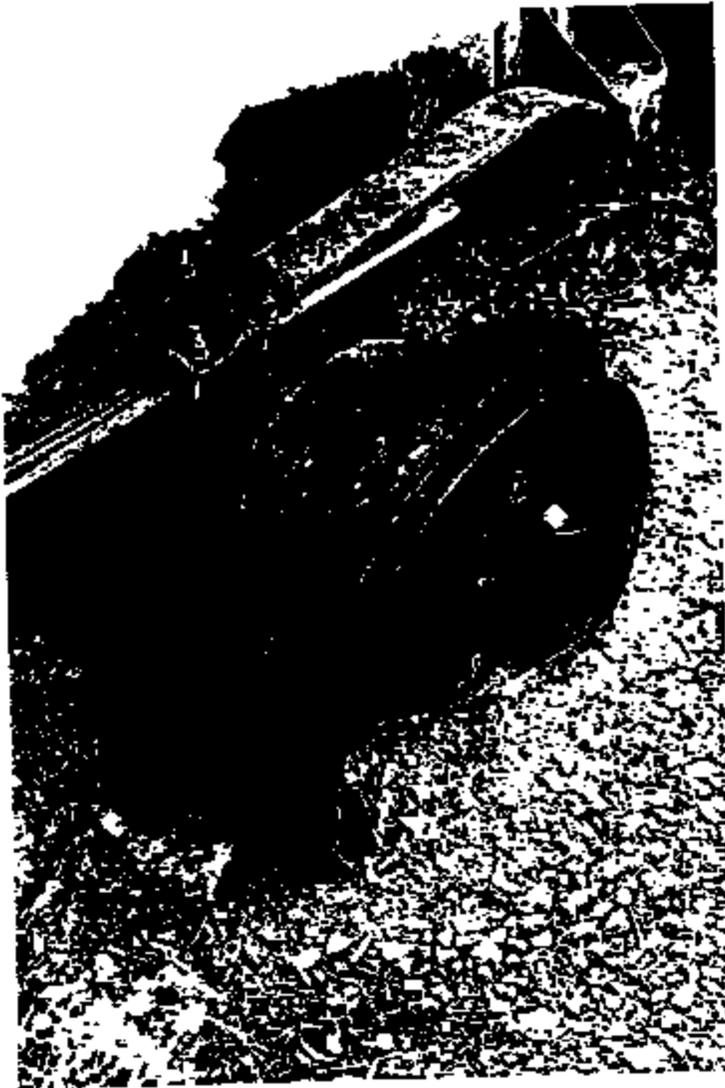


Figure 7
Driver Rear Tire



Figure 8
Passenger Front Tire

ERG5-803-LC-8385



Figure 9
Passenger Rear Tire



Figure 10
Tread Remains Recovered



Figure 11
Hood

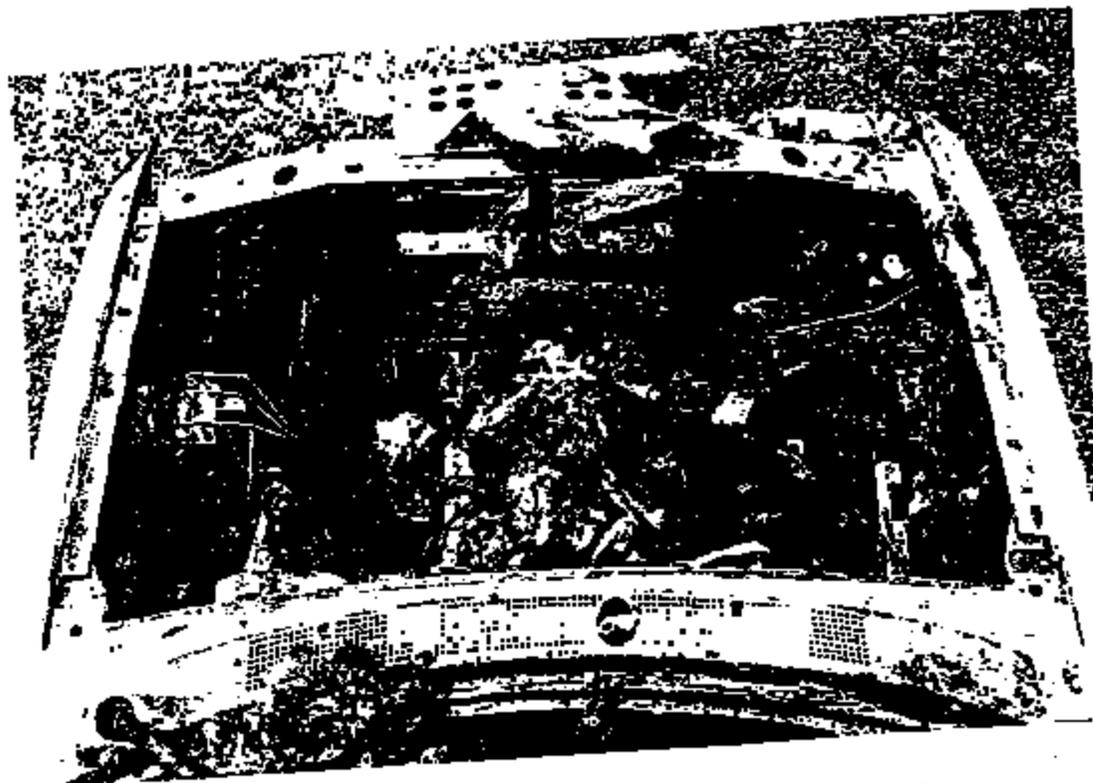


Figure 12
Engine Compartment

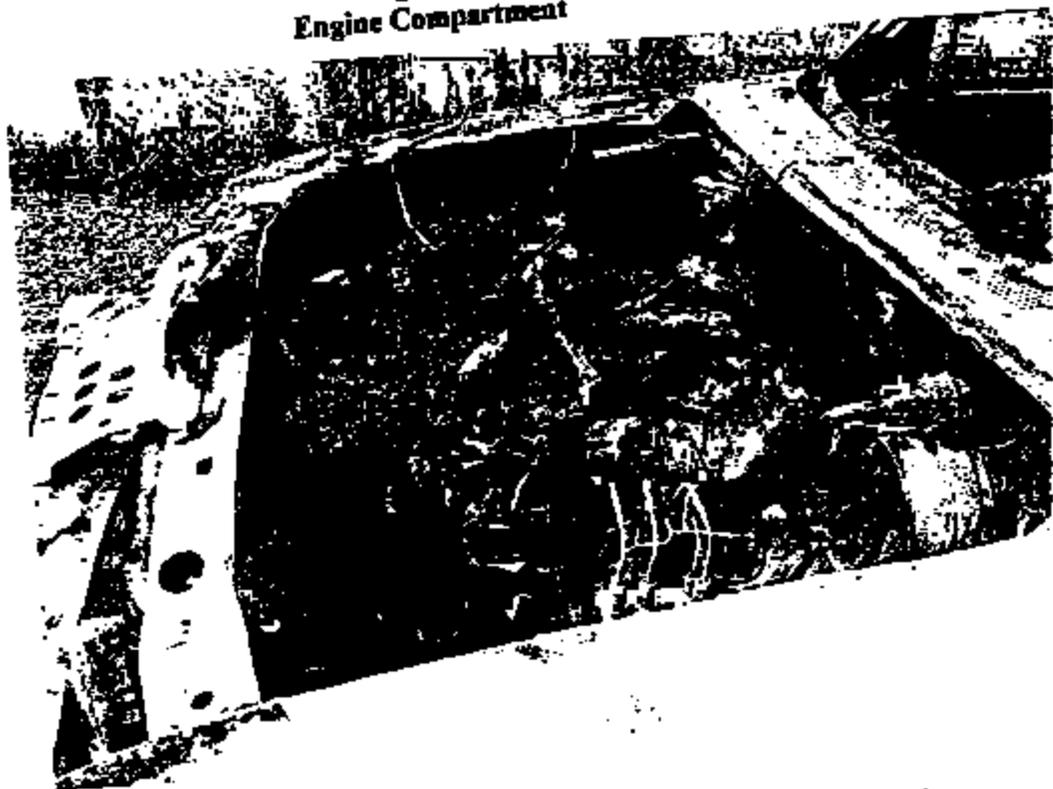


Figure 13
Engine Compartment - Driver Side View



Figure 14
Engine Compartment - Passenger Side View



Figure 15
Passenger Compartment - Front Section



Figure 16
Heater Core Opening From Passenger Side Front



Figure 17
Progression From Passenger Side



Figure 18
Progression to Driver Side



Figure 19
Cargo Bed



Figure 9. Burn Pattern On Right Side Valve Cover



Figure 10. Burn Pattern On Right Side Valve Cover



Figure 11. Burn Pattern On Oil Fill Tube



Figure 12. Close-up View Of Burn Pattern On Oil Fill Tube

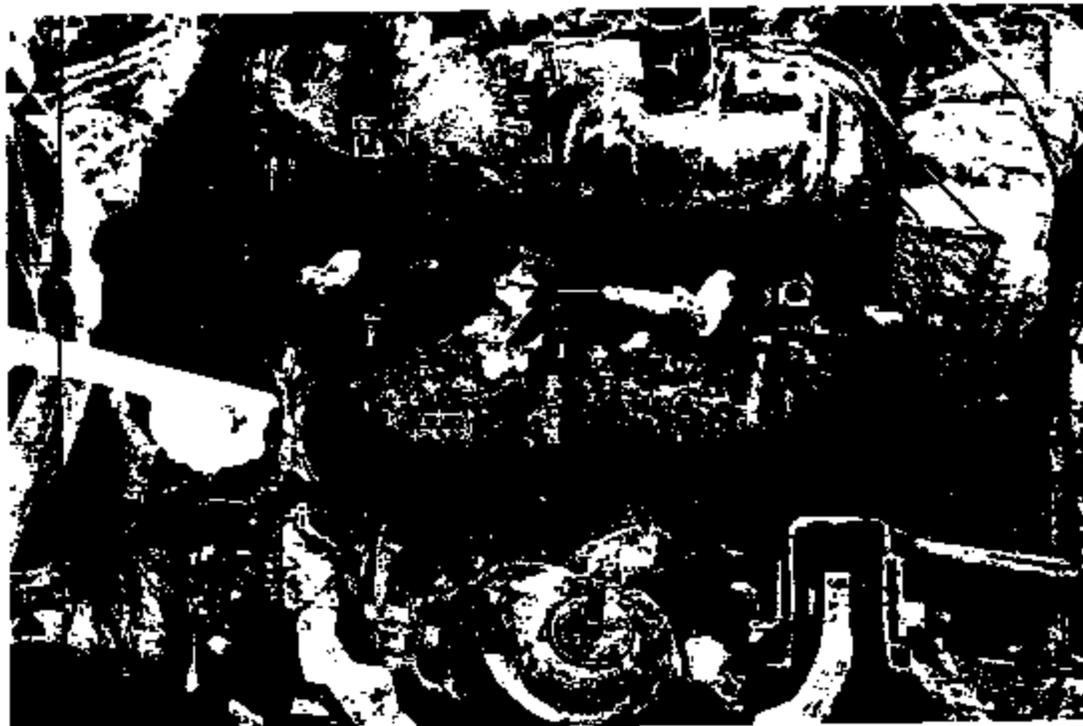


Figure 13. Right Side View Of Valve Cover And Exhaust Manifold



Figure 14. Fuel Return Hose



Figure 15. Fuel Return Hose Right Front Of Engine



Figure 16. Fuel Return Line Spring Connector



Figure 17. Pressure Relief Valve Fitting



Figure 18. Pattern On Fitting Hex Nut

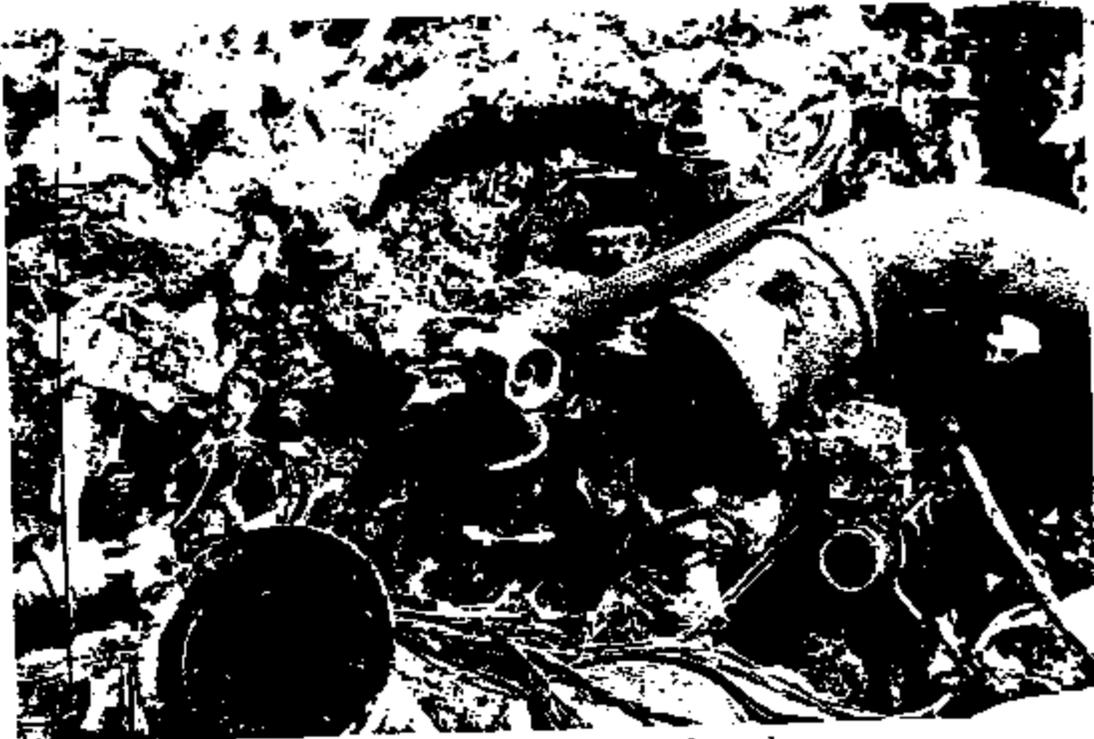


Figure 19. Hex Nut Threads

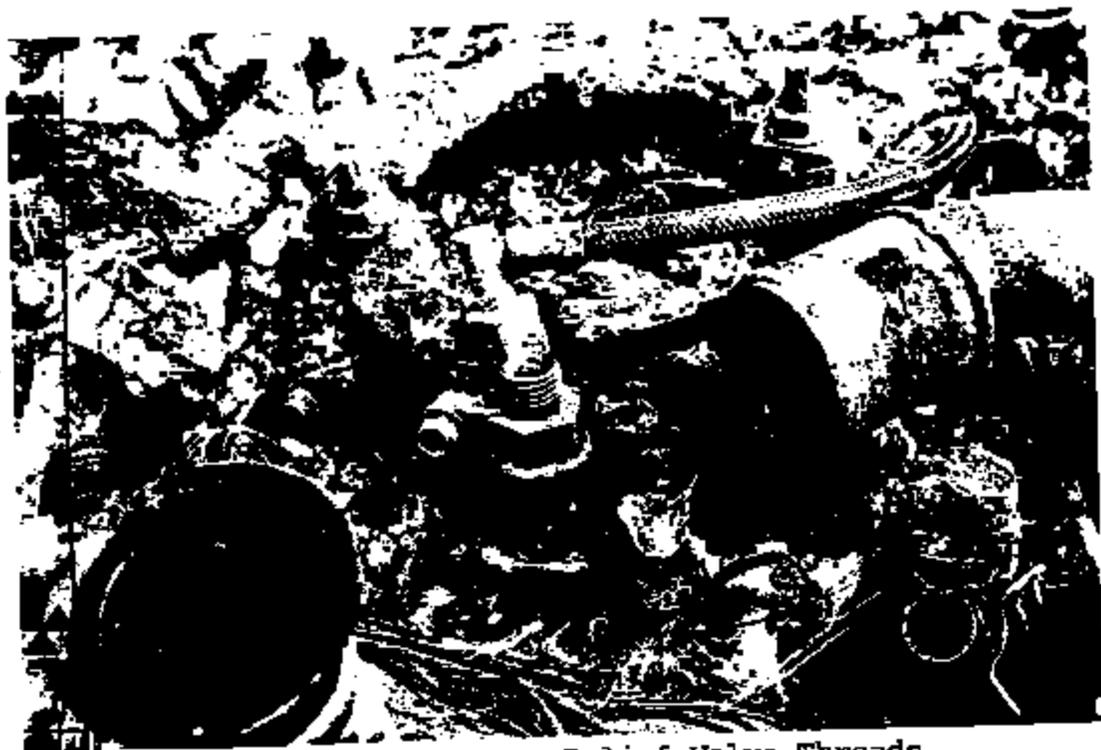


Figure 20. Pressure Relief Valve Threads

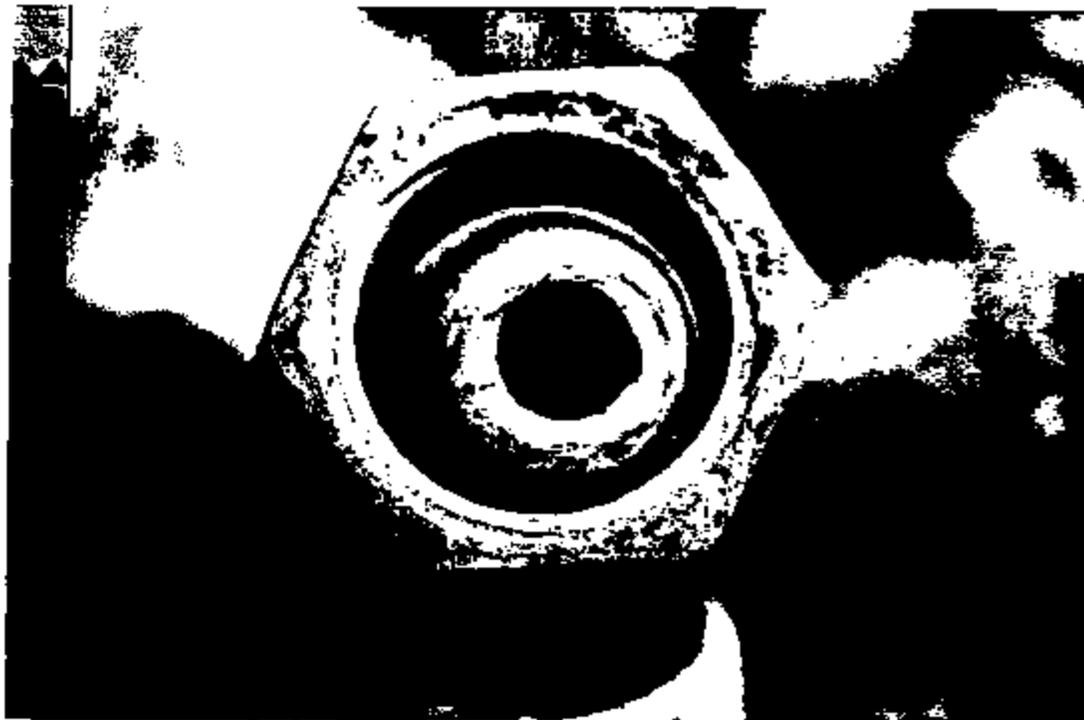


Figure 21. Ball End Of Hose Fitting

KB ENGINEERING

1271 EDGEHILL ROAD
COLUMBUS, OHIO 43212
614 / 299-0803
FAX 614 / 299-0831

July 25, 2000

Amy Hamilton
Grange Mutual Companies
P. O. Box 945
Findlay, OH 45839

RE: Your Claim N^o [REDACTED]
KBE Project N^o 00-0704 Fuel System Failure Analysis

Dear Ms. Hamilton:

Pursuant to your request, K B ENGINEERING (KBE) has examined a 1999 Ford Ranger pick-up that was reportedly involved in a fire on July 6, 2000. The information submitted to KBE was that while the vehicle was being driven, the driver detected the odor of gasoline. When he pulled over and opened the hood, he observed gasoline spraying in the engine bay. He closed the hood and went for help. The vehicle was examined by Mr. Rick Spencer, C.F.I., of Spencer Consulting Services, who determined that the origin of the fire was in the center to right side of the engine bay. Specifically, KBE was requested to determine the casual factor for the fire. KBE's study consisted of the following:

1. On July 18, 2000, Mr. Kenneth W. Berchak, P.E., KBE's Mechanical Engineer, examined the vehicle at Osborne Towing in Kenton, OH.

Based on the above source of information, KBE has determined the following:

The subject vehicle, reference Figures 1 and 2, was a 1999 Ford Ranger Extended cab pick-up truck. Examination of the chassis revealed the dashboard mounted V.I.N. plate was in place and readable, reference Figure 3. The V.I.N. embossed on the plate was 1FTZR15X3X[REDACTED]. Examination of the dashboard revealed the fire destroyed the vehicle interior and instrument panel which prevented the recording of the vehicle mileage.

Examination of the hood revealed that it was manufactured of aluminum. Examination of the partially melted hood revealed that the fire intensity was greatest on the right side of the engine bay, reference Figure 4. Examination of the engine side of the

hood, reference Figure 5, revealed that the next area of intense fire was located along of the center and rear of the engine bay.

Examination of the engine bay, reference Figures 6 and 7, revealed that the non-metallic engine bay components were destroyed in the fire. Examination of the top of the engine revealed that the aluminum air intake had melted and collapsed on the top of the engine, reference Figure 8. Examination of the right front side of valve cover revealed a fire pattern at the base of the oil fill tube indicating intense heating, reference Figures 9 and 10. Examination of the left side of the oil fill tube, reference Figures 11 and 12, revealed a burn pattern indicating that gasoline sprayed against the fill tube. Examination of the exhaust manifold indicated a liquid flow pattern over the component, reference Figure 13. Continued examination of the top forward section of the engine revealed that the fuel injection pressure relief valve return line was a steel braided hose crimped onto a brass fitting, reference Figure 14. Following this line across the top of the engine revealed that it terminated at the left front of the engine adjacent to the cross member and left side frame rail, reference Figures 15 and 16. Examination of the area around the chassis frame rail did not reveal an area of intense heating.

Returning to the fuel inject pressure relief valve, reference Figure 17, revealed that the fuel line fitting was a brass material. Examination of the hose crimped onto the fitting revealed that the non-metallic inner hose had been destroyed during the fire. Further, the hose crimp was loose on the fitting tube. Continued examination of the fitting revealed that the hex nut portion of the fitting was extremely loose on the threaded pressure relief valve. Rotation of the hex nut revealed a fire pattern on the hex nut faces under the crimped hose, reference Figure 18. The extreme looseness of the hex nut enabled the removal of the fitting from the steel pressure relief valve without the use of a tool, reference Figure 19. Examination of the threaded portion of the pressure relief valve, reference Figure 20, did not revealed any evidence of the hex nut having been cross-threaded. Examination of the hose fitting seat revealed a liquid flow pattern on the ball end seat, reference Figure 21.

Analysis of the examination data revealed that the gasoline spray reported by the vehicle owner was located at the hose fitting attachment to the pressure relief valve. This was supported by the fire pattern on the right front valve cover/exhaust manifold

assembly and the oil fill tube. Further, the destruction of the entire right side of the aluminum hood indicated that the fire intensity was greater along the right side of the engine bay and continued for an extended time. The melted rear center of the hood was consistent with the fire intensity adjacent to the hose fitting and melting of the air intake manifold.

The pressure relief valve body was manufactured from a steel alloy while the hose fitting attaching to the valve body was manufactured from a brass alloy. Each material has its own coefficient of thermal expansion. The expansion rate of brass is slightly greater than that of steel. As a result, the brass fitting will expand slightly more than the steel fitting in a fire. Because of the thread configuration, a brass fitting attached to a steel part will often be loose after it is in a fire. Examination of the ball end of the hose fitting indicated that the hex nut was loose and permitted the flow of gasoline from the threaded fitting.

The examination of the crimped hose fitting on the pressure relief valve adapter revealed that it was also loose on the fitting. The crimped portion of the hose sleeve did exhibit a crimp imprint. Since the inner tube of the steel braided hose is a non-metallic material which was destroyed in the fire, the original fit of the hose to adapter could not be determined.

In summary, based upon the observations and analysis herein, it is the opinion of K B ENGINEERING that the engine bay fire resulted from a leaking steel braided Fuel return line hose fitting installed on the fuel injector pressure relief valve.

If you have any questions concerning this report or require the additional services of K B ENGINEERING, please contact the report author.

Sincerely,


Kenneth W. Berchak, P.E.
Mechanical Engineer
State Of Ohio
Registration N^o E-40676

cc:file 00-0704.wpd



Figure 1. Three-quarter Left Front View Of Pick-up



Figure 2. Three-quarter Right Front View Of Pick-up



Figure 3. Dashboard Mounted V.I.N. Plate

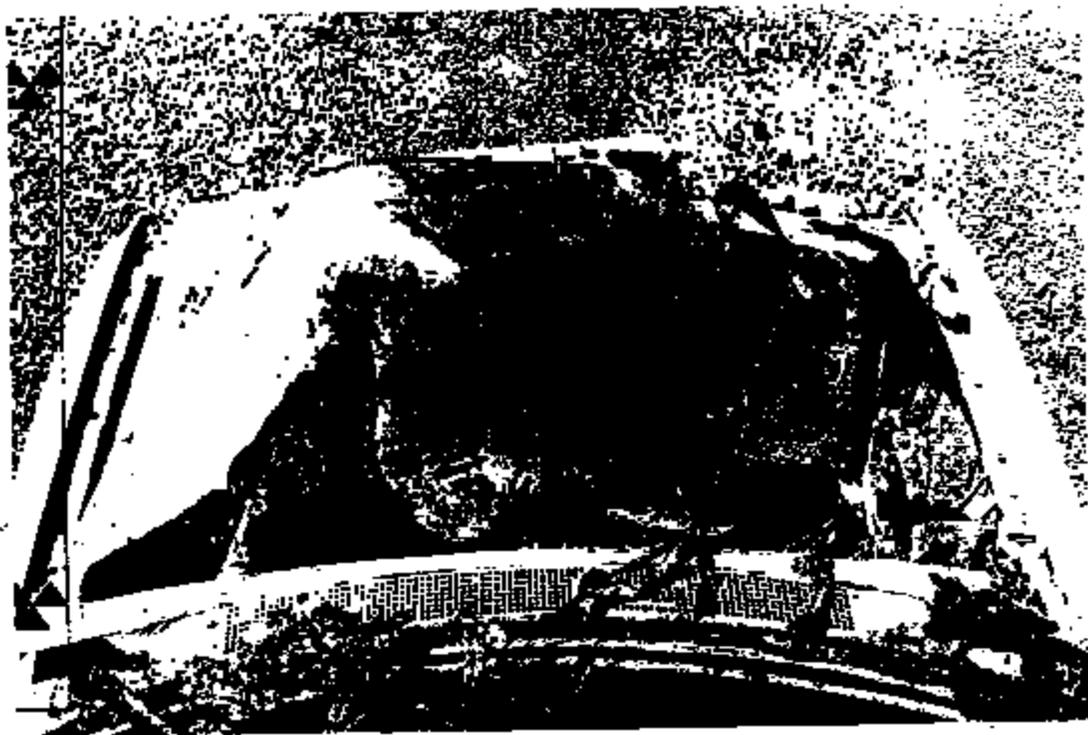


Figure 4. Fire Damaged Hood (Viewed From Top Of Cab)



Figure 5. Engine side Of Hood



Figure 6. Engine Bay From Left Front



Figure 7. Engine From Right Front



Figure 8. Left Side Of Engine



Figure 9. Burn Pattern On Right Side Valve Cover

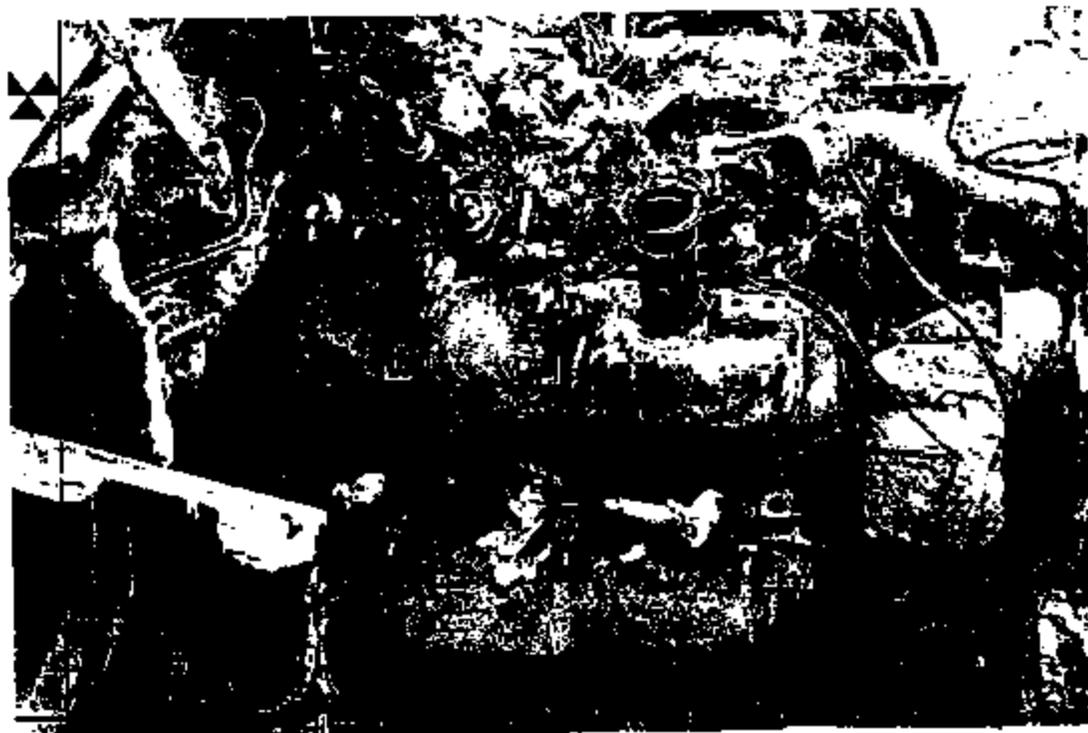


Figure 10. Burn Pattern On Right Side Valve Cover



Figure 11. Burn Pattern On Oil Fill Tube



Figure 12. Close-up View Of Burn Pattern On Oil Fill Tube



Figure 13. Right Side View Of Valve Cover And Exhaust Manifold



Figure 14. Fuel Return Hose



Figure 15. Fuel Return Hose Right Front Of Engine



Figure 16. Fuel Return Line Spring Connector



Figure 17. Pressure Relief Valve Fitting



Figure 18. Pattern On Fitting Hex Nut



Figure 19. Hex Nut Threads



Figure 20. Pressure Relief Valve Threads

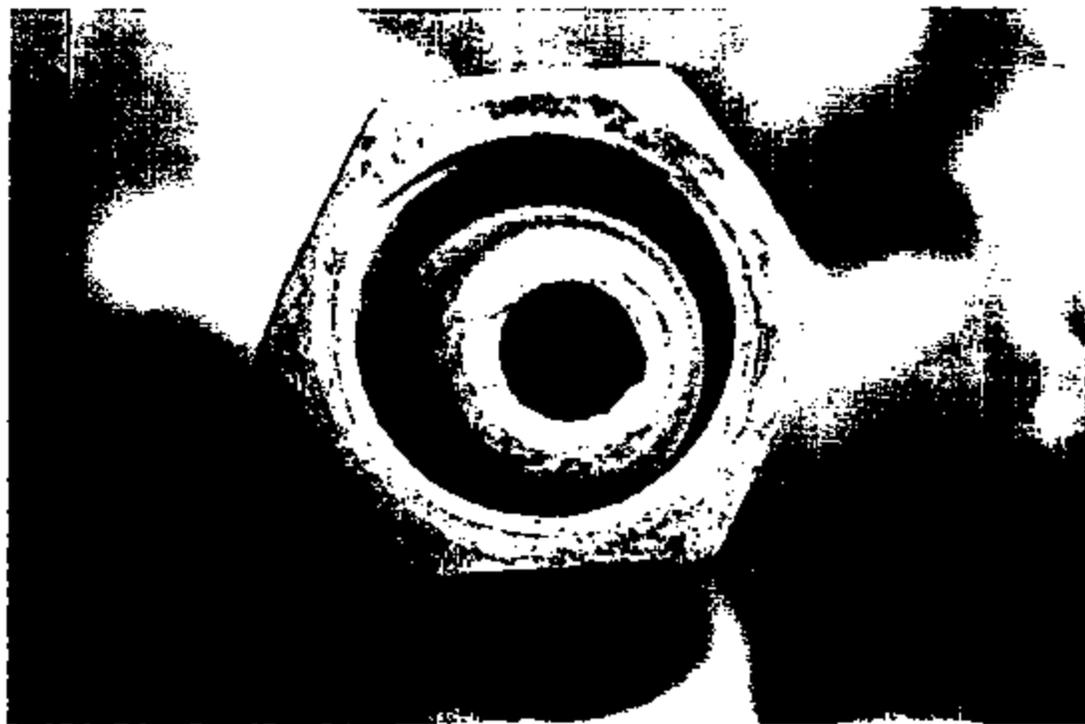


Figure 21. Ball End Of Hose Fitting

OHIO TRAFFIC CRASH REPORT

OH-1 (Rev. 1-82)

EA85-885-LC-8413

LOCAL REPORT NO. 33-235-00 OH-3 OH-3 REPORTING AGENCY HARDIN SO REG. NO. 3300 OHIO USE ONLY - DO NOT MARK ABOVE

REPORT TAKEN AT STATION AT SCENE NO. OF VEH. INVOLVED 1 CRASH SEVERITY (CHECK MOST SEVERE) FATAL INJURY PROPERTY DAMAGE ONLY COMBINED VEH. PROP. LOSS OVER \$100 UNDER \$100 NOT REPT. SOLVED UNSOLVED

IN COUNTY OF HARDIN CITY VILLAGE TWP. OF McDONALD DATE OF CRASH 07 06 00 TIME 7:15 TYPE: MILITARY CIVILIAN

CRASH OCCURRED ON CR 180 WITHIN THE INTERSECTION OF _____

IF NOT IN INTERSECTION (LIST NEAREST INTERSECTING STREET, MILEPOST, HOUSE NO.) 1/10 MILES @ E of CR 75 CITY CODE _____

| LOC. |
|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|
| | | | | | | | | | | | | | | | |

A UNIT NO. 1 NO. OF OCCUPANTS 1 OPERATOR PASSENGER DRIVERLESS HIT & RUN NON-CONTACT INSURANCE CO. OR AGENT GEORGE / (unintelligible)

DRIVER/PEDESTRIAN NAME (LAST, FIRST, MI) _____ ADDRESS (NO., STREET, CITY, STATE, ZIP CODE) _____

PHONE NO. _____ BIRTH DATE _____ AGE _____ SEX _____ SOCIAL SECURITY NO. _____ STATE _____ DRIVER'S LICENSE NO. _____ OCCUPATION _____

OWNER (IF SAME AS DRIVER, WRITE SAME) _____ ADDRESS _____ PHONE _____

VEH. VIN 99 MAKE Ford MODEL Ranger COLOR Mar STYLE P/L STATE OH LICENSE PLATE NO. _____ TOWING SERVICE OSBORN VEHICLED DR. FROM W TO E

CIRCLE DAMAGE AREA  DAMAGE SEVERITY: NON-FUNCTIONAL FUNCTIONAL SHARING DAMAGE SCALE: NONE MODERATE LIGHT HEAVY VEHICLE DISPOSITION: DRIVEN AWAY REMAINED AT SCENE TOWED FIRE: NO FIRE FIRE DUE TO CRASH OTHER FIRE

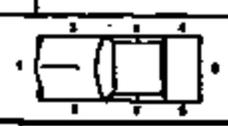
B UNIT NO. _____ NO. OF OCCUPANTS _____ OPERATOR _____ PASSENGER _____ DRIVERLESS _____ HIT & RUN _____ NON-CONTACT _____ INSURANCE CO. OR AGENT _____

DRIVER/PEDESTRIAN NAME (LAST, FIRST, MI) _____ ADDRESS (NO., STREET, CITY, STATE, ZIP CODE) _____

PHONE NO. _____ BIRTH DATE _____ AGE _____ SEX _____ SOCIAL SECURITY NO. _____ STATE _____ DRIVER'S LICENSE NO. _____ OCCUPATION _____

OWNER (IF SAME AS DRIVER, WRITE SAME) _____ ADDRESS _____ PHONE _____

VEH. VIN _____ MAKE _____ MODEL _____ COLOR _____ STYLE _____ STATE _____ LICENSE PLATE NO. _____ TOWING SERVICE _____ VEHICLED DR. FROM _____ TO _____

CIRCLE DAMAGE AREA  DAMAGE SEVERITY: NON-FUNCTIONAL FUNCTIONAL SHARING DAMAGE SCALE: NONE MODERATE LIGHT HEAVY VEHICLE DISPOSITION: DRIVEN AWAY REMAINED AT SCENE TOWED FIRE: NO FIRE FIRE DUE TO CRASH OTHER FIRE

FROM UNIT NO.	NAME (LAST, FIRST, MI)	BIRTH DATE	AGE	SEX	POSITION						INJURIES					
					A	B	C	D	E	F	A	B	C	D	E	F

RESTRAINTS: NOT USED NONE AVAILABLE LAP BELT USED SHOULDER BELT USED CHAIR SAFETY SEAT AIR BAG USED USE NOT REPORTED

ALCOHOL: TESTED YES NO

OFFENSES CHARGED AND DESCRIPTION: O.R.C. CITY ORG. O.R.C. CITY ORG.

RECEIVED CALL 1803 DISPATCHED 1805 ARRIVED 1823 CLEARED 1920 OTHER TIME _____ TOTAL MINUTES 57

DATE REPORT FILED 07 06 00 PHOTOS YES NO OFFICER'S NAME Det. J. Hasi BADGE NO. 3315 CHECKED BY 3318

DRIVER-PEDESTRIAN-VEHICLE SECTION

OCCUPANT SECTION

POLICE ACTION

JUL 20 2000

235-00 DESCRIBE WHAT HAPPENED REFER TO DVTS BY NUMBER U- WAS ESTABLISHED ON CR 182 WHEN DRIVER SPERLED GAS

FINES & PULLED PARTIALLY OFF THE ROAD. DRIVER EXITED VEHICLE & CHECKED UNDER HOOD WITH VEHICLE RUNNING. ENGINE COMPARTMENT OF U-1 CONTAIN FIRE.

WEATHER 1 NO ADVERSE WEATHER 2 RAIN 3 SNOW 4 FOG 5 HIGH WIND 6 OTHER		1	FIRST HARMFUL EVENT 1 HEAD ON 2 REAR-END 3 BACKEND 4 SIDEWIDE BEETING 5 SIDEWIDE PASSING 6 ANGLE 7 PARKED MOTOR VEH 8 PEDESTRIAN 9 ANIMAL 10 TRAM 11 PEDALCYCLE 12 OTHER NON-M V 13 FIXED OBJECT 14 OTHER OBJECT 15 FALL FROM OR IN VEH 16 OVERTURNING 17 OTHER NON-COLLISION	17	SHOW NORTH WITH ARROW 
ROAD CONDITIONS 1 DRY 2 WET 3 SNOW 4 ICE 5 DIRT/GRAND 6 OTHER		1	ONE MV IN TRANSPORT (COLLISION) 7 PARKED MOTOR VEH 8 PEDESTRIAN 9 ANIMAL 10 TRAM 11 PEDALCYCLE 12 OTHER NON-M V 13 FIXED OBJECT 14 OTHER OBJECT (NON-COLLISION) 15 FALL FROM OR IN VEH 16 OVERTURNING 17 OTHER NON-COLLISION		
LIGHT 1 DAYLIGHT 2 DAWN 3 DUSK 4 DARK NO LIGHTS 5 DARK-LIGHTED 6 OTHER		1	LOCATION 1 INTERSECTION 2 INTERSECTION-RELATED 3 DRIVEWAY ACCESS 4 RAILROAD CROSSING 5 BRIDGE-PASSING OVER 6 BRIDGE-PASSING UNDER 7 NON-INTERSECTION 8 PRIVATE PROPERTY 9 RAMP 10 LETTER CODE	7	
ROAD CONTOUR 1 STRAIGHT LEVEL 2 STRAIGHT GRADE 3 CURVE LEVEL 4 CURVE GRADE		2			
OCCURRENCE 1 ON ROADWAY 2 OFF LEFT SIDE 3 OFF RIGHT SIDE 4 ON OPPOSING LANE OF A DIVIDED HIGHWAY		1			
SPECIAL AREA 1 ROAD CONSTRUCTION MAINTENANCE AREA 2 SCHOOL ZONE					

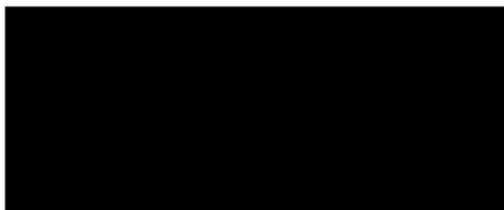
TYPE OF UNIT 1 CAR 2 BUS 3 TRUCK 4 MOTORCYCLE		PRE-CRASH ACTIONS 1 DRIVER ACTIONS 2 PEDESTRIAN ACTIONS 3 TRAFFIC CONTROL 4 FIXED OBJECT STRUCK		CONTRIBUTING FACTOR 1 DRIVER ERROR 2 NON-DRIVER FACTOR 3 VEHICLE DEFECTS	
CAR 1 SUB-COMPACT 2 COMPACT 3 MID SIZE 4 FULL SIZE BUS 15 SCHOOL BUS 16 CHURCH 17 PUBLIC BUS EMERGENCY 18 POLICE VEHICLE 19 FIRE TRUCK 20 AMBULANCE/RESCUE OTHER 21 TAXI 22 MOTOR HOME 23 TRAIN 24 FARM VEHICLE 25 FARM EQUIPMENT 26 SNOWMOBILE 27 CONSTRUCTION EQUIP 28 ANIMAL WAGON 29 ANIMAL WAGON 30 BICYCLE 31 ALL OTHERS P - PEDESTRIAN		DRIVER ACTIONS 1 GOING STRAIGHT 2 TURNING RIGHT 3 TURNING LEFT 4 TURNING ON RED LIGHT 5 U TURN 6 STOPPED TO TURN 7 STOPPED IN TRAFFIC 8 PARKING/UNPARKING 9 PARKED 10 BACKING 11 PASSING 12 CHANGING LANES 13 MERGING/EXITING RAMP 14 OUT OF CONTROL 15 SLEEPING 16 DROWSY/DRY VEH 17 OTHER DRV ACTIONS PEDESTRIAN ACTIONS 18 CROSSING IN X-WALK 19 CROSSING OTHER THAN X-WALK 20 WALKING IN ROAD (WITH TRAFFIC) 21 WALKING IN ROAD (AGAINST TRAFFIC) 22 PLAYING IN ROAD 23 WORKING ON ROAD 24 ENTERING OR LEAVING VEHICLE 25 PUSHING/PULLING ON VEH IN ROAD 26 OTHER IN ROAD 27 ON SHOULDER OR SHOULDER TRAFFIC CONTROL 1 NO CONTROL 2 STOP SIGN 3 YIELD SIGN 4 TRAFFIC SIGNAL 5 TRAFFIC FLASHERS 6 SCHOOL ZONE 7 RAILROAD CROSSBUCK 8 RAILROAD FLASHERS 9 RAILROAD GATES 10 COUNTY BARRICADES 11 POLICE OFFICER 12 PAVEMENT MARKINGS 13 OTHER PEDESTRIAN 14 NO CONTROLS 15 CROSSWALK LINES 16 WALKWAY/WALK DEVICE		DRIVER ERROR 1 NONE 2 FAILURE TO YIELD 3 UNSAFE SPEED 4 FOLLOWING TOO CLOSELY OR AHEAD 5 RAN RED LIGHT 6 RAN STOP OR YIELD SIGN 7 IMPROPER TURN 8 IMPROPER PASSING 9 IMPROPER LANE CHANGE 10 IMPROPER BACKING 11 IMPROPER START FROM PARKED POSITION 12 STOPPED OR PARKED ILLEGALLY 13 LEFT OF CENTER 14 FAILURE TO CONTROL 15 DRIVER INATTENTION 16 DROVE OFF ROAD REASON UNKNOWN 17 OTHER DRIVER ERROR NON-DRIVER FACTOR 18 VEHICLE DEFECTS 19 LOAD SHIFTING 20 FALLING, SPILLING 21 PAVEMENT DEFECT 22 SHOULDER DEFECT 23 DEBRIS ON ROAD 24 HAZARDOUS TRAFFIC SITUATION 25 VISION OBSTRUCTION 26 ANIMAL ACTIONS 27 PEDESTRIAN ACTIONS VEHICLE DEFECTS CODE IF CONTRIBUTING FACTOR IS 18 PRIMARY SECONDARY	
SPEED UNIT EST. LEGAL HWY DRIVER PASS A 55 A B B		NO HELMET USE 1 NO HELMET 2 FULL COVERAGE 3 FULL FACIAL COVER 4 OTHER TYPE HELMET		TRUCK LOAD 1 EMPTY 2 PERISHABLE GOODS 3 GENERAL FREIGHT 4 METAL/HEAVY MACHINERY 5 HAZARDOUS GAS 6 HAZARDOUS LIQUID 7 HAZARDOUS SOLID 8 RADIOACTIVE MATERIAL TRUCK AXLES 1 TRACTOR-TRAILER 2ND	

IN THE HARDIN COUNTY COURT OF COMMON PLEAS

FILED
HARDIN COUNTY
COMMON PLEAS COURT

2002 JUL -1 PM 3:02

LORI J. STEVENSON
CLERK



Plaintiff,

- Case No: 20021155CVH
Judge David C. Faulkner

vs.

Ford Motor Company
c/o C.T. Corporation System, Statutory Agent
1300 East 9th Street
Cleveland, Ohio 44114

Defendant.

COMPLAINT FOR DAMAGES

COUNT ONE

1. The corporate Plaintiff is duly authorized to sell insurance in the state of Ohio and at all times hereinafter mentioned, had in full force and effect a policy of insurance which provided coverage on a 1999 Ford Ranger bearing Vehicle Identification Number 1FTZR15X3X [redacted] owned and/or leased by [redacted] hereinafter referred to as "insured").

2. Defendant Ford Motor Company (hereinafter referred to as "Ford") is a corporation authorized to do business in the state of Ohio, or has conducted business in the state of Ohio.

3. Defendant, Ford, negligently designed, manufactured, distributed, marketed and/or sold a 1999 Ford Ranger bearing Vehicle Identification Number 1FTZR15X3XP [REDACTED]

4. On or about the 6th day of July, 2000, in McDonald Township, Hardin County, Ohio, the "Insured" was using said 1999 Ford Ranger in a foreseeable manner when a fuel fed fire did originate in and/or around the engine compartment, damaging the vehicle beyond repair. Said vehicle was deemed a total loss.

5. The vehicle's value preceding the incident was in the amount of \$28,132.22.

6. Said fire and loss were a direct and proximate result of Defendant's aforementioned negligence.

7. Pursuant to the above mentioned policy of insurance, the corporate Plaintiff was required to and did pay to and/or on behalf of its "Insured" the sum of \$28,132.22 and is thereby subrogated in that amount.

COUNT TWO

8. Plaintiff hereby incorporate paragraphs one through seven of this Complaint as if fully restated herein.

9. Defendant negligently failed to warn of the dangers of said product.

COUNT THREE

10. Plaintiff hereby incorporates paragraphs one through nine of this Complaint as if fully restated herein.

11. Said product was unsafe for its intended use, which use was reasonably foreseeable by Defendant.

COUNT FOUR

12. Plaintiff hereby incorporates paragraphs one through eleven of this Complaint as if fully restated herein.

13. Defendant made certain express and implied warranties which were relied upon by the "Insured", the Defendant's breach of which directly and proximately caused the damages described above. Copies of any applicable written warranties are not currently in the possession of the Plaintiff, however, they are believed to already be in the possession of the Defendant.

COUNT FIVE

14. Plaintiff hereby incorporates paragraphs one through thirteen of this Complaint as if fully restated herein.

15. The risks inherent in the design of the 1999 Ford Ranger outweighed the benefits of that design.

COUNT SIX

16. Plaintiff hereby incorporates paragraphs one through fifteen of this Complaint as if fully restated herein.

17. Defendant did fail to design and/or manufacture said 1999 Ford Ranger in conformity with the standards and requirements of its industry.

COUNT SEVEN

18. Plaintiff hereby incorporates paragraphs one through seventeen of this Complaint as if fully restated herein.

19. Defendant did place into the stream of commerce a product which was not of merchantable quality and was unfit for the purpose in which it was intended.

COUNT EIGHT

20. Plaintiff hereby incorporates paragraphs one through nineteen of this Complaint as if fully restated herein.

21. The 1988 Ford Ranger was defective in manufacture and/or construction as described in Ohio Revised Code § 2307.74, was defective in design or formulation as described in Ohio Revised Code § 2307.75, was defective due to inadequate warning or instruction as described in Ohio Revised Code § 2307.76 and/or was defective because it did not conform to representations made by the Defendant as described in Ohio Revised Code § 2307.77.

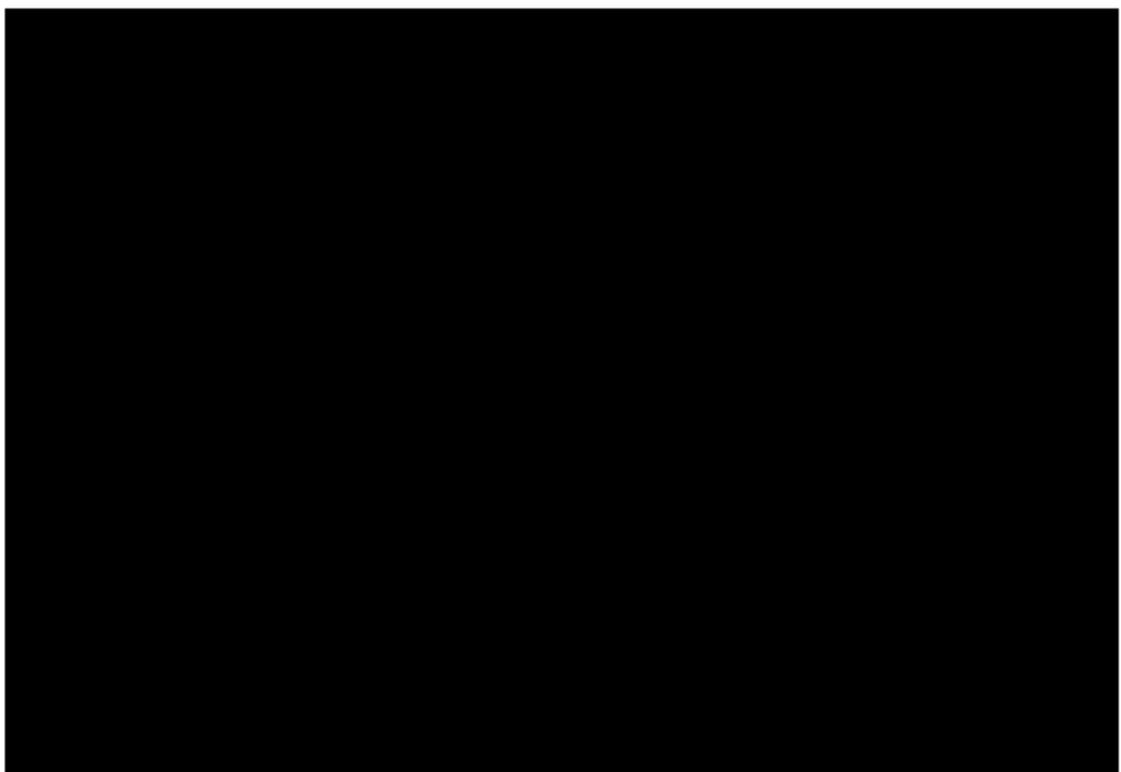
22. As a direct and proximate result of one or more of the above described failures and/or defective and dangerous conditions, Plaintiff were damaged as set forth above.

WHEREFORE, Plaintiff, Grange Mutual Casualty Company, demands judgment in the amount of \$28,132.22, plus costs and interest.

CHEEK & ZEEHANDLER, L.L.P.

BY: 

Alessandro Sabatino, Jr. (0062106)
Attorney for Plaintiffs
471 East Broad Street, 18th Floor
P.O. Box 15069
Columbus, Ohio 43215-0069
(614) 229-3888 (01-7523)



DIV. K
JUDGE
MARTHA E. SASSONE

05 MAY 21 11 10:52 AM
COURT REPORTER
COP...
JOB...
FILED...

020-926

[REDACTED]

DOCKET NO: _____ SECTION: _____

VERSUS

24TH JUDICIAL DISTRICT COURT
PARISH OF JEFFERSON

FORD MOTOR COMPANY STATE OF LOUISIANA

PETITION FOR DAMAGES

NOW INTO COURT, through undersigned counsel, comes [REDACTED]
[REDACTED] an individual of the full age of majority residing in the Parish of East
Baton Rouge, State of Louisiana, and FARMERS INSURANCE EXCHANGE, a
foreign insurer authorized to do business in the State of Louisiana, who, with
respect, represents as follows:

I.

Made defendant herein is FORD MOTOR COMPANY, a foreign corporation
doing business in the State of Louisiana, with its principal business in Louisiana
located in the City of Metairie, Parish of Jefferson.

II.

On or about October 25, 2004 [REDACTED] parked his 1998 Ford F150
under the carport of his residence located at [REDACTED] State of
Louisiana.

III.

After entering his residence [REDACTED] heard a loud "popping" noise
coming from the carport area and he discovered fire was emitting from the engine
compartment from under the hood and left front wheel opening.

Z:\00C9\stausd\1111\FLEBR21443\Petition Damages

PAGES 4/1/15

60

IV.

The fire ignited because of a failure of the vehicle's brake pressure switch.

V.

FORD MOTOR COMPANY was the manufacturer of the 1988 Ford F150, and was responsible for design and installation of the defective brake pressure switch that failed and caused the fire damage.

VI.

As a result of the above-mentioned fire [REDACTED] 1988 Ford F150, was a total loss.

VII.

At all times pertinent hereto [REDACTED] was insured for damages to said vehicle by Farmers Insurance Exchange policy no. 0158121400, which provided for a \$250.00 deductible.

VIII.

As a result of the aforementioned automobile property damages and pursuant to the aforementioned Farmers Insurance Exchange insurance policy, co-plaintiff Farmers, has paid the sum of \$3483.59 to the co-plaintiff [REDACTED]. Therefore, Farmers Insurance Exchange, is subrogated to [REDACTED] rights to recover the amount of said payment from the defendant named hereinabove.

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ER05-085-LC-0420

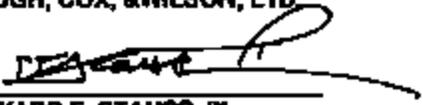
IX.

As a result of the aforementioned automobile and property damage, James Stewart is entitled to recover the \$250.00 deductible portion of such property damages.

WHEREFORE, plaintiffs, [REDACTED] and Farmers Insurance Exchange, pray that defendant be served with a copy of this petition and be cited to appear and answer same, and after all due process and legal proceedings are had, there be judgment rendered in favor of the plaintiff, [REDACTED] in the amount of \$250.00 and in favor of the plaintiff, Farmers Insurance Exchange, in the amount of \$3483.59 and against the defendant, Ford Motor Company, plus, legal interest on said amounts from the date of judicial demand until paid, court costs, and all other general and equitable relief to which plaintiffs are entitled under the premises.

Respectfully submitted:

KEOGH, COX, & WILSON, LTD

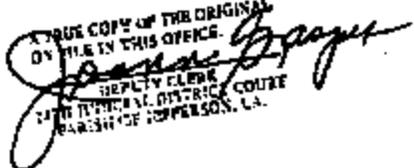
By: 

EDWARD F. STAUSS, III
La. Bar Roll No. 17816
701 Main Street (70802)
P.O. Box 1151
Baton Rouge, LA 70802
Telephone: (225) 383-3786
Facsimile: (225) 343-9812

*Attorneys for James Stewart and Farmers
Insurance Exchange*

1. TO BE SERVED THROUGH THE LOUISIANA LONG ARM STATUTE:
(Louisiana Revised Statutes 13:3201, et seq.)

2. **FORD MOTOR COMPANY**
through its registered agent for service of process
CT CORPORATION SYSTEM
8550 United Plaza Boulevard
Baton Rouge, LA 70809

TRUE COPY OF THE ORIGINAL
FILED IN THIS OFFICE

DEPUTY CLERK
EASTERN DISTRICT COURT
BAYOU OF THOMPSON, LA.

IMAGED BY 3105

2:\DOCs\stausm\11111\FILES\21443\petition\Damages

ER85-085-LC-8421



PRIVILEGED & CONFIDENTIAL

Office of the General Counsel

Ford Motor Company
Parklane Towers West
Suite 300
Three Parklane Boulevard
Dearborn, Michigan 48125-2668

December 9, 2004

Spyridon, Koch, Palermo & Doman
Three Lakeway Center, Suite 3010
3838 North Causeway Blvd.
Metairie, LA 70002
ATTENTION: PAUL PALERMO

Re: Claimant: [REDACTED]
D/OBE: 10-25-04
Vehicle: Z0104-38

Dear Mr. Palermo:

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.)

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

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

- 9. What was the city and state of occurrence: Baton Rouge, Louisiana
- 10. The 17 digit vehicle identification number: 1FTEF1SN2+L [REDACTED]
- 11. What was the mileage at time of occurrence: Approximately 162,000
- 12. What is the alleged defect:
electrical failure inside or in vicinity of speed control disconnect switch

SPYRIDON, KOCH,
PALERMO & DORNAN

LLC | ATTORNEYS AT LAW

December 1, 2004

NEW ORLEANS

Via Certified Mail
No. 7004 1350 0000 1906 8620

Return Receipt Requested
And Via U. S. Mail

Ford Motor Company
through its Registered Agent
C-T Corporation.
8550 United Plaza Boulevard
Baton Rouge, LA 70809

Re: Insured: [REDACTED]
Date of Loss: October 25, 2004
Our File No. Z0104-38
Damage Claim: \$23,000.00

Dear Sir or Madam:

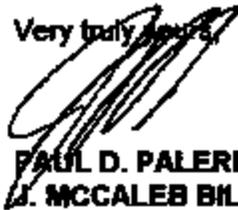
We represent Farmers Insurance Group relative to a property damage claim filed by [REDACTED] the owner of a 1996 Ford F150 truck. On October 25, 2004, the truck's engine caught fire, as a result of which [REDACTED] house sustained heavy damage.

Our preliminary investigation indicates that the aforementioned fire may have resulted from a defect in the truck manufactured by Ford. In accordance with the terms of [REDACTED] insurance policy, we are hereby placing Ford Motor Company on notice of Farmers' subrogation claim for all sums paid to and on behalf of [REDACTED] as a result of the fire and its intention to assert such claims against Ford Motor Company.

Please have your representative contact the undersigned within fifteen (15) days of the receipt of this correspondence.

With best regards, we are

Very truly yours,


PAUL D. PALERMO
J. MCCAULEY BILBRO

PDP/JMB:kca

NEW ORLEANS OFFICE
Three Lathrop Center, Suite 3010
3830 North Causeway Boulevard
Metairie, Louisiana 70002
phone 504 836 7800 fax 504 836 7818

www.stpl.com

BILCO OFFICE
771 Water Street
P.O. Box 154
Biloxi, Mississippi 39533
phone 228 374 2013 fax 228 374 3819

EA05-065-LC-9424



EFI

Engineering and Fire
Investigations

EFI

2218 North Park Drive
Kingwood, Texas. 77339
(281) 358-4441
(800) 334-0200

PRIVILEGED AND CONFIDENTIAL

Report Number One and Final
November 18, 2004

PREPARED FOR: Sentry Select Insurance
P.O. Box 8022
Davenport, Iowa 52808

ATTENTION: Sara Fitzpatrick

INSURED:

[REDACTED]

DATE OF LOSS:

October 25, 2004

LOSS LOCATION:

[REDACTED] Louisiana [REDACTED]

POLICY NUMBER:

N/A

CLAIM NUMBER:

[REDACTED]

INVESTIGATOR:

Richard Jones

EFI FILE:

98310-02269

**THIS REPORT FURNISHED AS PRIVILEGED AND CONFIDENTIAL TO ADDRESSEE.
RELEASE TO ANY OTHER COMPANY, CONCERN OR INDIVIDUAL IS SOLELY THE
RESPONSIBILITY OF ADDRESSEE.**

98310-02269

-1-

November 18, 2004

Insured: Sentry Ford

DETERMINATION OF CAUSE AND ORIGIN

This is an accidental fire. The fire originated in the engine compartment. The available evidence indicates the fire was caused by a malfunction in the cruise control device.

ASSIGNMENT

The assignment was received on November 5, 2004 with instructions to conduct a cause and origin investigation. The assignment commenced on November 8, 2004.

ENCLOSURES

1. Vehicle exam worksheet;
2. Photographs (40) with explanation sheet;
3. Vehicle Inspection Report;
4. Results of Recall Research; and,
5. Additional materials package containing CD Rom of digital photographs.

CASE VEHICLE EXAMINATION

Vehicle Description

The initial vehicle examination was conducted on November 8, 2004 at [REDACTED] Baton Rouge, Louisiana. [REDACTED] Present during portions of the fire scene exam was [REDACTED] the owner of the vehicle.

The vehicle was a 1996 Ford F150 pickup bearing Louisiana license plate [REDACTED]. The VIN was confirmed as 1FTRF15H2II [REDACTED]. The odometer was not discernable due to the damage from the fire. The inspection sticker was not discernable due to fire damage.

Alterations to the vehicle include the removal of several components from the engine compartment. These items were placed in a box on the front driver seat. There were no adverse conditions effecting the examination. The above alterations did not prevent an accurate determination of cause.

Vehicle-Evidence Integrity

Evidence of forcible entry include damage to the hood lock. Subsequent investigation revealed the

Insured: [REDACTED]

hood was forced open by the fire department. The evidence indicates the doors were not locked at the time of the fire.

Exterior

The engine compartment suffered the greatest fire damage. The doors were closed during the course of the fire. The front driver window was closed at the time of the fire. The front passenger window was closed at the time of the fire. The rear driver side window was closed at the time of the fire. The rear passenger side window was closed at the time of the fire. The front tires were fire damaged, while the rear tires were serviceable. There were no indications the wheels had been recently removed or exchanged. The spare was in the normal location and serviceable. No pre-fire exterior trauma or accident damage was found.

Interior

The entire passenger compartment was gutted by the fire. The keys were not found in the vehicle. All of the equipment and accessories were original factory installed with the addition of the aftermarket installation of a camper shell over the bed of the truck. There was no evidence that any of the items had been removed. The seats and fabric were consumed by the fire. The carpet was burned on the surface. The rubber pads were melted off the pedals. The shift lever was in the park position. The emergency brake was not set. There were no personal items noted in the vehicle.

Engine Compartment

The hood exhibited fire damage throughout. The hood separated from the frame. The vehicle had an 8 cylinder normal mounted engine and had rear wheel drive. The air filter was not in place and exhibited damage on the side. The upper canister end of the air intake tube was burned away. The rubber components of the supply and return fuel line, including the in-line filter, were consumed. The evidence indicates all required clamps were in place. The engine compartment emission system components were destroyed. The radiator and fan were totally destroyed. The upper and lower radiator hoses were consumed. The shroud was not intact. There was heavy fire damage to both inner fenders.

The engine oil was full and was clean. The transmission fluid was normal, although a true reading cannot be accomplished without the engine running. The transmission fluid was clean. The transmission coolant lines to the radiator were consumed. The air conditioning system was not intact. All of the heater hoses were not in place. There was fire and heat damage to the top and cap of the power steering pump. Items normally found but not present in the engine compartment include the power steering pump, the wiper motor, the brake master cylinder and the brake pressure switch.

Insured: [REDACTED]

Electrical System

The only evidence of electrical activity was on the cruise control/brake suppression system. The fuse panel could not be examined due to the extent of damage. The battery was in place and was located on the passenger side at the front of the engine compartment. There was heat and fire damage to the battery located on the outer casing. The cables were no longer attached to the battery terminals and the connectors exhibited evidence of fire damage.

The alternator was intact and mounted and exhibited evidence of fire damage to the upper front portion. The wiring to the alternator was attached and exhibited evidence of heat and fire damage, the insulation had melted away. The starter exhibited fire and heat damage and was mounted. The wiring to the starter was attached and exhibited evidence of heat and fire damage, the insulation had melted away. The wiring harness was examined and no evidence of failure was noted.

Fuel and Emission System

The fuel tank, filler assembly and filler cap had no involvement in this fire. The fuel tank was metal and had not ruptured nor had the seams split on the tank. The gas cap and filler assembly were melted away. The fuel lines were traced and no evidence of a leak or rupture was noted. The fuel pump exhibited no indications of a malfunction, a leak or a rupture. The injection assembly exhibited evidence of heat and fire damage and was not involved in the initiation or spread of the fire. The exhaust system and catalytic converter were in place and functional.

Evidence

No samples or evidence was collected.

Fire Initiation

The fire originated in the engine compartment on the driver side against the fire wall. The fire spread up and out, consuming the brake fluid reservoir. It traveling into the air filter and air ducts consuming the rubber components of the fuel lines, extending to the underside of the hood before venting through the open spaces in the fire wall and entering the cab. The fire also vented through the gap between the hood and the fender and through the radiator system.

The heaviest damage was to the top of the cruise control device. The heaviest damage to the brake booster was to the front and top. The heaviest damage to the valve covers was to the driver side. The heaviest damage to the engine compartment was to the driver side. The heaviest damage to the hood was over the brake booster.

The lowest fire damage was to the front driver side tire. There was evidence of arcing on the cruise

Insured: [REDACTED]

control device. The first fire was witnessed in the engine compartment by [REDACTED]

Available heat and possible ignition sources located in the origin area include vehicle primary electrical wiring, a malfunction in the cruise control device and incendiary.

A malfunction in the cruise control device cannot be eliminated as a cause.

Eliminatory

The vehicle primary electrical wiring at the battery, starter and alternator exhibited no evidence of electrical activity or a malfunction. There was no evidence to indicate incendiarianism.

INVESTIGATION

[REDACTED] is the owner. He lives [REDACTED] aton Rouge, Louisiana [REDACTED] and can be contacted at [REDACTED]. The following information was obtained from [REDACTED]

On October 25, 2004 at 11:00 a.m. [REDACTED] had just returned from Superior Ford on Highway 19 where he had the oil changed in his vehicle. He heard a popping noise outside. He looked out the door leading to the carport and saw the front of his vehicle on fire.

He exited the house through that door to get out of the house because the carport was also on fire. He did not think to use any other exit because the other doors remain locked and are never used. He had to pass directly in front of the burning vehicle, heading toward the yard.

The fire department arrived at his house. They treated him for second degree burns to his arm and transported him to the hospital.

[REDACTED] has not had any major problems with his truck. He has not had anything repaired or changed. His cruise control has not worked in over a year.

A day or so prior to this investigation, Glen Stricker, an investigator with Rimkus, had been to [REDACTED]'s house to look at his truck.

98310-02269

-5-

November 18, 2004

Insured [REDACTED]

COMMENTS

Per your instructions, I will hold this file in abeyance while awaiting an additional inspection with a Ford representative. You may contact me through the Texas Service Center or at the number listed below.

Richard Jones
Investigator
Covington, Louisiana
985-373-0253

Photo Sheet

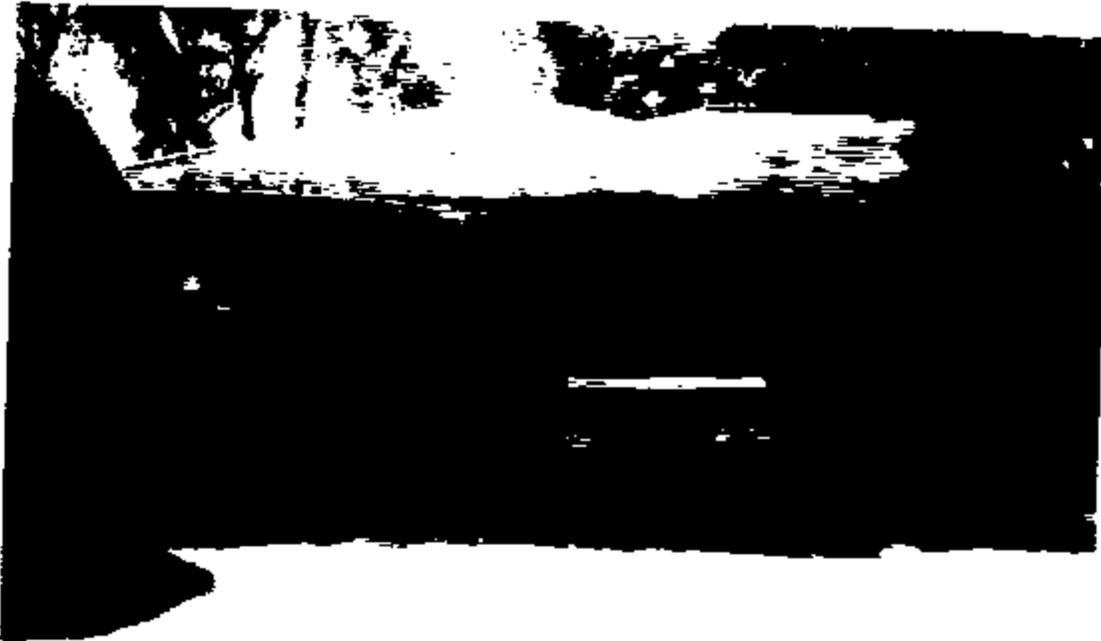
EPI No.: 20310-0220

Insured: [REDACTED]



No. 1

Front of structure



No. 2

ER05-005-LC-9431

Carport



Engineering and Site
Investigations

Photo Sheet

ESI No.:

98310-82260

Insured:



No. 3

West side of structure



No. 4

SW corner of structure

ESIS-003-1-C-0432

EPI

Engineering and Fire
Investigation

Photo Sheet

EPI No.:

86310-82209

Instated:



No. 8

South side of structure



No. 9

SE corner of structure

EPIC-002-LC-0433

Photo Sheet

EPI No.:

BA314-02269

Issued:



No. 7

East side of structure



No. 1

NE corner of structure

EPIC-001-LC-9434



Engineering and Physical
Investigations

Photo Sheet

EPI No.:

98316-02268

Insured:



No. 8

Location of electric meter



No. 10

Electric meter

EPI-001-C-9435

EFI

Engineering and Fire
Investigation

Photo Sheet

EFI No.:

98319-92289

Insured:



No. 11

Location of gas meter



No. 12

Gas meter

EP05-088-LC-0138



Engineering and More
Investigations

Photo Sheet

EPI No.:

88319-82269

Insured:



No. 13

Rear of Ford F-150



No. 14

Driver side of Ford F-150

ER05-085-10-9437

ER

Engineering and The
Investigation

Photo Sheet

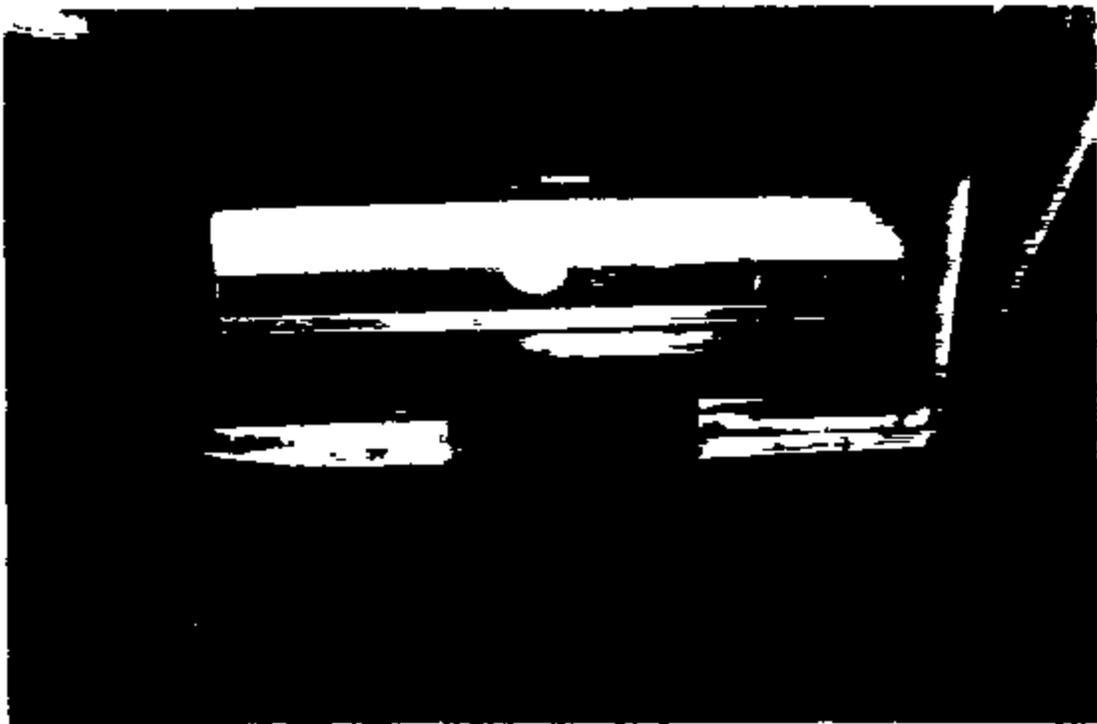
EPI No.: 86310-02209

Insured: [REDACTED]



No. 15

Passenger side of Grand AM



No. 18

Rear of F-150

ER05-005-LC-0438

EA

Engineering and Fire
Investigations

Photo Sheet

EFI No.:

44316-42288

Insured:



No. 17

Rear passenger side of F-150



No. 18

Front passenger side of F-150

EP05-083-LC-945B

EF

Engineering and Site
Investigations

Photo Sheet

EF No.:

98319-92289

Insured:



No. 18

Front driver side of F-150



No. 28

Front driver side of F-150

ENR-003-10-9446

EA

Engineering and Fire
Investigations

Photo Sheet

EFI No.:

98316-02200

Insured:



No. 21

Front passenger side of Grand AM



No. 22

Front driver side of Grand AM

EM03-803-10-9441

EPI

Engineering and Fire
Investigators

Photo Sheet

EPI No.:

98318-02209

Insured:



No. 23

Front of F-150



No. 24

Hood frame of F-150

EP05-005-LC-0442



Engineering and Fire
Investigations

Photo Sheet

EFI No.: 00310-02219

Insured: [REDACTED]



No. 25

Top of hood frame of F-150



No. 28

Underside of hood of F-150

EP05-000-LC-0443

EPI

Engineering and Fire
Investigation

Photo Sheet

EPI No.:

80318-82289

Insured:



No. 27

Top of hood of F-150



No. 28

Passenger compartment of F-150

ENR-083-10-9444

EPI

Engineering and Fire
Investigations

Photo Sheet

EFI No.:

98318-87288

Insured:



Handwritten notes:
PARTS FROM
ENGINE COMPARTMENT
POSSIBLE SEEN IN FIRE
- W/IN ROOM
- CLAMP WAS NOT
REMOVED FROM
SUBJECT



No. 29

Description of items removed from engine compartment of F-150



No. 30

Bed of F-150

EFIS-888-LC-9445



Engineering and Fire
Investigation

Photo Sheet

EF No.:

98310-02289

Insured:



No. 31

Bed of F-150 and spare tire



No. 32

Engine compartment taken from driver side

98310-02289-10-0418



Engineering and Fire
Investigations

Photo Sheet

EPI No.:

98310-02209

Insured:



No. 33

Engine compartment taken from passenger side



No. 34

Passenger side of engine compartment taken from front of vehicle

EM85-605-1C-947



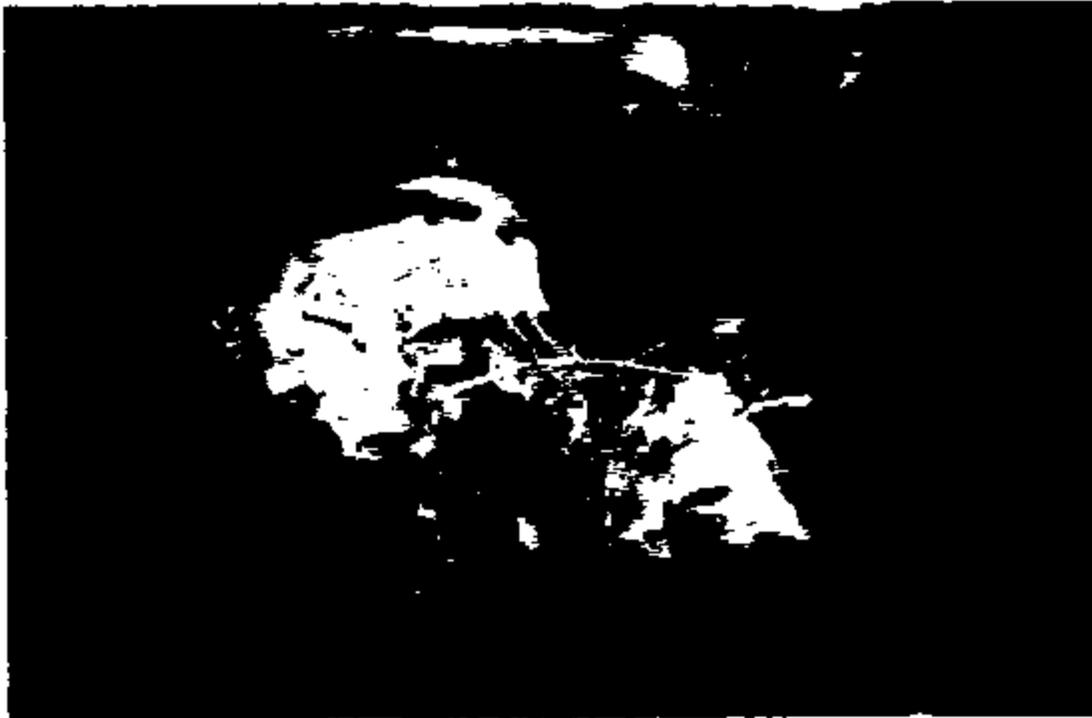
Engineering and Fire
Investigations

Photo Sheet

EFI No.:

R0310-02268

Insured:



No. 30

Engine block



No. 35

Driver side of engine compartment taken from front of vehicle

EFI-0310-02268

EPI

Engineering and Fire
Investigations

Photo Sheet

EPI No.:

98910-02289

Insured:



No. 37

Driver side of engine block



No. 38

Brake booster

8116-ST-508-2013

EF

Engineering and Fire
Investigators

Photo Sheet

EFI No.:

96316-02289

Insured:



No. 39

Components removed from engine compartment



No. 40

Components removed from engine compartment

EFIS-005-LC-9628