

Ask the Tough Questions

The following is a checklist of questions to ask the expert, witnesses, and yourself when evaluating the claim.

Question:

Answer:

- | | |
|-----------------------------------------------------------------|-------------------------------------------------------------------|
| 1. Is there a product involved? | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| 2. Type of product? | _____ |
| 3. Brand name? | _____ |
| 4. Model and serial number? | _____ |
| 5. Manufacturer? | _____ |
| 6. Seller (store where purchased)? | _____ |
| 7. Age of product (date purchased)? | _____ |
| 8. Purchased new or purchased old? | <input type="checkbox"/> New <input type="checkbox"/> Used |
| 9. If used, from whom purchased? | _____ |
| 10. Was product being used properly? | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| 11. Any outward signs of defectiveness? | _____ |
| 12. Prior problems with the product? | _____ |
| 13. Prior repairs to the product? | _____ |
| 14. If repairs, by whom, when and why? | _____ |
| 15. Proper maintenance to the product? | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| 16. Maintenance logs on the product? | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| 17. Have warranty, instruction manuals? | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| 18. Any alterations to the product?
If so, what was altered? | <input type="checkbox"/> Yes <input type="checkbox"/> No
_____ |
| 19. Exemplars of product in the house? | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| 20. Exemplars of product still available? | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| 21. Able to point it out at the store? | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| 22. Preserve product, exemplars, manuals, etc. | _____ |

Maintenance/Repairs Issues

- | | |
|--------------------------------------|-------|
| 23. Who did the work? | _____ |
| 24. What prompted need for the work? | _____ |
| 25. What was intended scope of work? | _____ |
| 26. When was the work performed? | _____ |

- 27. What workers did the work? _____
- 28. Who witnessed work being done? _____
- 29. Did owner participate in the work? _____
- 30. Any documents reflecting the work? _____

Fire Cause and Spread

- 31. Where is damage most severe? _____
- 32. What was owner doing during loss? _____
- 33. Where was owner during the loss? _____
- 34. Who else was present during loss? _____
- 35. Where was the fire first observed? _____
- 36. What alerted you to the fire? _____
- 37. First see smoke or fire? _____
- 38. Color and smell of smoke at first? _____
- 39. Color and smell of fire at first? _____
- 40. Sounds of fire when first observed? _____
- 41. Size of the fire when first observed? _____
- 42. Dimensions of fire when first seen? _____
- 43. What burned in the beginning? _____
- 44. Lighting conditions during fire? _____
- 45. When did electricity go out? _____
- 46. Vision blocked or obstructed? _____
- 47. How much time spent observing fire? _____
- 48. Dimensions of the fire as progressed? _____
- 49. Describe direction/spread of fire? _____
- 50. Color of fire as it progressed? _____
- 51. Did color vary as it progressed? _____
- 52. Height of the flames? _____
- 53. What materials were burned? _____
- 54. Wind conditions during fire, if any? _____
- 55. Did it spread evenly in all directions? _____
- 56. Did fire spread rapidly or slowly? _____
- 57. Did fire “jump” from place to place? _____
- 58. Efforts to extinguish the fire? _____

- 59. Windows/doors open during fire? _____
- 60. Time chronology of fire's progress? _____
- 61. How many alarms issued and when? _____
- 62. Time it took firefighters to arrive? _____
- 63. Time for firefighters to apply water? _____
- 64. Fire's size when firefighters arrived? _____
- 65. Fire's size when water first applied? _____
- 66. When was fire placed under control? _____
- 67. Did closest fire sprinkler function? _____
- 68. Accumulated trash, waste, debris? _____
- 69. Unsafe storage of hazardous materials
(e.g., paint thinners, lacquers, gasoline, etc.) _____
- 70. Unsafe storage or warehousing practices _____
- 71. **Defects in sprinkler systems:**
 - failure of the system to activate,
 - failure of the system to operate pursuant to its design
 - sprinkler heads which are blocked
 - control valves which are inoperable and the
 - existence in and of itself of a sprinkler system
 - other: _____
- 72. Did smoke or heat detectors work? Yes No
- 73. Did burglar alarm systems work? Yes No
- 74. Were alarm systems monitored? Yes No
- 75. Did outside monitoring company receive
alarm and respond to it? Yes No
- 76. Was there security guard protection?
If yes, what type? _____
- 77. Other security issue (areas of access into the
building, locked doors, glazed windows, vacant
buildings, deteriorated neighborhood conditions,
broken windows) _____
- 78. Did fire doors operate? Yes No
- 79. Were there fire walls and/or fire rated walls Yes No
- 80. Were there fire stops between units? Yes No
- 81. What type of insulation? _____

- 82. Commercial cooking or painting (Ansul systems) _____
- 83. Lightning strike protection _____

Vehicle Fire Checklist

- 84. Model year _____
- 85. Manufacturer _____
- 86. Make of vehicle _____
- 87. Color _____
- 88. VIN _____
- 89. License number _____
- 90. Mileage _____
- 91. When last driven or run _____
- 92. Who last drove or ran vehicle _____
- 93. How far driven when last driven _____
- 94. Where driven _____
- 95. When parked _____
- 96. Circumstances of parking vehicle _____
- 97. Circumstances of the fire _____
- 98. Time of fire _____
- 99. Where vehicle was situated _____
- 100. Recalls _____
- 101. Repairs _____
- 102. Damage from extinguishing fire _____
- 103. Area of greatest damage (check) Engine Trunk Passenger Dash
 Other _____
- 104. Wheels/tires/rims match? _____
- 105. **Tire condition (tread, inflated, deflated, burn marks)**
 - Driver side front tire _____
 - Driver side rear tire _____
 - Passenger side front tire _____
 - Passenger side rear tire _____

106. **Doors (open or closed, locked or unlocked, doorjamb, stickers)**

- Driver side front door _____
- Driver side rear door _____
- Passenger side front door _____
- Passenger side rear door _____
- Hatch _____

107. **Windows (up or down, broken, soot, flow direction)**

- Driver side front _____
- Driver side rear _____
- Passenger side front _____
- Passenger side rear _____

108. **Trunk**

- Spare tire _____
- Flammable contents _____
- Personal property _____
- Contents _____

109. **Components** (note manufacturer; condition; if original or after-market; purchased where, when and from whom; if repaired or serviced and where, when and by whom)

- Antenna _____
- Mirrors _____
- Battery _____
- Driver side airbag _____
- Passenger side airbag _____
- Side airbags _____
- Speakers _____
- Air conditioner _____
- Stereo _____
- Satellite radio _____
- CB _____
- TV _____
- CD _____
- DVD _____
- Charger _____
- Global positioning unit _____

Cigarette lighter	_____
Others	_____

110. Interior items	
Carpet	_____
Floor mats	_____
Underlayment	_____
Dash board	_____
Ashtray	_____
Console	_____
Loose papers	_____
Underlayment	
111. Seats (covers, loose items, bucket or bench, up or down, degree of burn)	
Driver side front	_____
Passenger side front	_____
Driver side rear	_____
Passenger side rear	_____
112. Vandalism/theft/missing	_____
113. Glove box	
Open or closed	_____
Contents	_____

114. Steering column	
Interlock	_____
Keys	_____
Ignition position	_____
Lock location	_____
Power steering	_____
Standard steering	_____
R & P	_____
115. Engine	
Size	_____
Cylinders	_____

116. **Transmission**

- Auto _____
- Manual _____
- Speed _____
- Overdrive _____
- 4-wheel drive _____
- Front wheel drive _____

117. **Turbocharger**

Yes No

118. **Fuel system:**

- Gasoline or diesel _____
- Fuel tank location _____
- Fuel pump location _____
- Is there a carburetor? _____
- Is there fuel injection? _____
- Cylinder _____
- Throttle body _____
- Cold start injector _____
- Fuel line routing _____
- Fuel line hoses _____

119. **Tank examinations:**

- Eruptions _____
- Fuel level _____

120. Brake fluid level _____

121. Cooling fluid level _____

122. Washer fluid level _____

123. Oil level _____

124. **Exhaust examination:**

- Air pump exhaust control _____
- Check valve _____
- Piping _____
- Mech _____
- Proximity _____
- Communication to rear _____

125. **Vapor control system**

- Cannister #1 _____
- Cannister #2 _____
- EGR valve _____
- PCV valve _____

126. **Electrical examination of the engine compartment**

- Battery
- to power distribution _____
 - to starter _____
 - to alternator _____
 - grounds _____
 - alternative paths _____
 - loose connections _____
 - fusible links _____
- Starter condition _____
- Alternator
- electrical connections _____
 - any loose connections _____
 - bearings _____
 - fan blade condition _____
 - casting condition _____

127. **Power distribution box**

- Condition _____
- Wire faults
- beads? _____
 - sharp edges? _____
 - overloads (acting like fusible links) _____

128. **Ignition system**

- Ignition type _____
- Ignition switch circuit _____
- Coil _____
- Plug wires _____
- Fuse box wiring to f/b _____
- Fuse box fuses _____

129. **Flexible hoses**

- Brake lines _____
- Fuel lines _____
- Power steering lines _____
- ATF lines _____
- ATF radiator _____

130. V patterns from leaking liquid? _____

131. Surfaces with combustible fluids? _____

132. **Hot spots**

- Exhaust manifold _____
- Catalytic converter _____
- Wiring _____
- Smoker _____
- Other _____
- Ashtray _____
- Upholstery _____
- Dashboard _____
- Friction _____

133. Draw oxidation/burn patterns _____

134. System in area of most fire intensity _____

135. Source of fuel _____

136. Source of ignition _____

137. Material to sustain combustion _____

138. Review of the checklist _____

139. Fire scenario _____

Water Loss

140. Where did the water come from? _____

141. When first notice a problem? _____

142. Nature of the problem _____

143. Steps taken to address the problem? _____

If from a product or from improper repairs, see above checklist

Weather/Structural

- 144. What were wind speeds in the area? _____
- 145. Wind speeds per building specs? _____
- 146. Wind speeds per building codes? _____
- 147. Load specifications for failed part? _____
- 148. Wind speeds within specs or codes? _____
- 149. Proper adherence of roof membrane? _____
- 150. Proper brackets for roof material? _____
- 151. Proper spacing of trusses, brackets? _____
- 152. Proper number of trusses, brackets? _____
- 153. Proper size of trusses, brackets, etc.? _____
- 154. Proper connection/welding of joints? _____
- 155. When was the building built? _____
- 156. Any significant upgrades and when? _____
- 157. Other similarly damaged nearby buildings? _____
- 158. Condition(s) of storm drains, culverts, downspouts or gutters? _____
- 159. Need a structural/civil engineer? Yes No
- 160. Need a metallurgist (e.g. brackets)? Yes No
- 161. Need materials science expert (bad concrete, polymers, roof membranes, etc.)? Yes No
- 162. Need weather expert? Yes No
- 163. Need mechanical engineer? Yes No
- 164. Need hydrologist? Yes No
- 165. What is the statute of repose, if any? _____
- 166. Any special notice requirements (to contractors and government entities)? _____
- 167. Any waivers of subrogation (AIA contracts, other construction contracts) _____
- 168. Any limitations in lease agreements? _____
- 169. Any other written limitations? _____
- 170. Retain pertinent documents _____
- 171. Retain key physical evidence (e.g., defective brackets, roofing materials, bracing) _____

- 172. Obtain pre-loss photos, diagrams, schematics _____
- 173. Obtain post-loss photos including possible aerial photos
to compare damage of surrounding buildings) _____
- 174. Obtain building officials' files if pertinent _____

This list of issues and questions are a reference point only. Some claims will not involve many of the questions posed. Other losses may trigger even more issues and questions than those listed. It can be difficult to identify every issue or question that can be asked about any given claim scenario in the beginning of the investigation process. Facts can change or be added that will give rise to new issues and follow-up questions. The law also varies from jurisdiction to jurisdiction, making some facts critical in one state but not in another. Feel free to consult with attorneys in our Subrogation and Recovery Department for any specific loss.

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