2009 August

Inside fire

- American Family notified Defendants via first-class U.S. Mail.
- Did American Family provide adequate sufficient notice?
- How long is adequate to maintain a fire scene?
- As to the method of mailing the notice, the Court held that notice can be effectuated by first class U.S. mail.
- Although *Golke* gives parties and litigants guidance and resolves some uncertainties surrounding the preservation of evidence following a loss and issues or notice, it remains to be seen how Wisconsin trial courts will apply it.

this issue

Wisconsin Supreme Court Rules on Proper Notice & Evidence Preservation

by Bradley Ayers & Robert Vaccaro, Attorneys at Law

Brad Ayers

The Wisconsin Supreme Court recently issued a decision that could significantly impact the analysis and determination of spoliation of evidence claims in Wisconsin. In *American Family Mut. Ins. Co. v. Golke*, _____ N.W. 2d ____, 2009 WL 2032239 (Wis. July 15, 2009), the Court considered questions certified by the Court of Appeals of Wisconsin, and reversed a circuit court judgment that American Family failed to preserve relevant evidence and did not give defendants adequate notice of claims against them or its intent to destroy a fire scene. The Court also reversed the circuit court's imposition of a dismissal sanction against American Family, remanding the case for trial.

American Family's insureds experienced a house fire in February 2000. American Family determined the fire was caused by roof repairs undertaken in 1994 by a partnership of three brothers, the Golkes. After a meeting with one of the partners, American Family sent a letter to the Golkes on March 13, 2000 by first class U.S. mail, putting them on notice of the fire and advising that destruction of the damaged building "will not take place until April 1, 2000". *Golke*, 2009 WL 2032239 at *2. The letter also advised its recipients to forward the letter to their liability carrier, which one of the partners accomplished. Id. at *2-3. On April 6, 2000, American Family sent the Golkes another letter by U.S. certified mail, again advising them of the loss and requesting the matter be reported to their insurance carriers. The second letter did not specifically address destruction of the fire scene, which ultimately occurred sometime after April 11, 2000. Neither the Golkes nor any representative on their behalf arranged to inspect the home. When suit was initiated, two of the partners claimed American Family provided insufficient notice; the third argued American Family failed to discharge its duty to preserve evidence, which the partner contended must be made available "until and unless all parties consent to its destruction." Id. at *5. Following the submission of evidence at trial, defendants moved the circuit court to dismiss American Family's claims due to spoliation of evidence. The court dismissed the claims as a sanction.

Robert Vaccaro

". . . Defendants moved the circuit court to dismiss American Family's claims due to spoliation of evidence . . ."

Reversing the circuit court's dismissal, the Court held (1) that the duty to preserve relevant evidence is discharged "when a party or potential litigant with a legitimate reason to destroy evidence provides reasonable notice of a possible claim, the basis for that claim, the existence of evidence

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Wisconsin Supreme Court Rules on Proper Notice &

relevant to the claim, and reasonable opportunity to inspect that evidence prior to its destruction"; (2) that sufficient notice can be provided by sending a letter by first class U.S. mail; and (3) that dismissal of an action as a sanction for spoliation is appropriate only when the spoliating party acts "egregiously". Id. at *4.

On the issue of notice, the Court held that trial courts should use their discretion to determine "whether the *content* of the notice is sufficient in light of the totality of the circumstances." Id. at *7 (emphasis in original). Factors potentially relevant to this analysis include (1) the length of time evidence can be preserved; (2) the ownership of the evidence; (3) any prejudice posed by the destruction of the evidence; (4) the form of the notice; (5) the sophistication of the parties; and (6) the burden and expense on the party in possession of the evidence to preserve it. Id.

As to the method of mailing the notice, the Court held that notice can be effectuated by first class U.S. mail. Evidence of such a mailing creates a "presumption of receipt" that can be countered only by an affirmative denial of receipt, not merely a lack of recollection of receipt. Id. at *8.

Finally, with respect to the penalties available for spoliation, the Court held that while such determinations will typically fall to the discretion of the trial courts, the ultimate sanction of dismissal is appropriate only when the party in control of the evidence acts egregiously, which the Court defines as "a conscious attempt to affect the outcome of the litigation or a flagrant, knowing disregard of the judicial process." Id. at *9 (citing Milwaukee Constructors II v. Milwaukee Metro Sewage Dist., 177 Wis. 2d 523, 533, 502 N.W. 2d 881, 884-885 (1993)).

Although *Golke* gives parties and litigants guidance and resolves some uncertainties surrounding the preservation of evidence following a loss and issues of notice, it remains to be seen how Wisconsin trial courts will apply it. Indeed, the Court's approval of a "totality of the circumstances" test relative to what constitutes "sufficient" notice could prove troublesome to the extent it hinders consistent, predictable results stemming from what is certain to be a wide variety of fact patterns underlying claims of spoliation. Nevertheless, the decision highlights the importance of responding to notice letters immediately in order to gain access to the scene as soon as possible and to avoid losing potential defenses, including the defense of spoliation.

Bradley Ayers and Robert Vaccaro are attorneys with the law firm of Flynn, Gaskins & Bennett located in Minneapolis, Minnesota. The firm handles trials and litigation arising out of fires and explosions.

To review a copy of the full Wisconsin Supreme Court ruling, please visit our website at www.whitemorefire.com and click on "publications".

Barbecue Grill Safety Tips

Each year about 600 fires/explosions occur with gas grills causing injuries. Many of the accidents happen the first time a grill is ignited for the season or after the grill's gas container is refilled and attached. Before you plan your next outdoor cookout, review these safety measures:

- Check grill hoses for cracks, holes, leaks or brittleness. As of April 1, 2002, the 3-prong design replaced the 4-prong handle as the safety standard.
- Move gas hoses as far away as possible from hot surfaces.
- Always keep propane gas containers upright.
- Never store spare gas containers under or near the grill or indoors.
- Never store or use flammable liquids like gasoline near the grill.
- Make sure your spark igniter is consistently generating to create a flame and burn the propane gas.
- When using barbecue grills on a deck or patio, be sure and keep sufficient space from siding and eaves.

Keep in mind that charcoal when burned in grills produces carbon monoxide (CO). CO is a colorless and odorless gas that can accumulate to toxic levels in closed environments.

- Never burn charcoal inside of homes, vehicles, tents or campers.
- Charcoal should never be used indoors, even if ventilation is provided.
- Since charcoal produces CO fumes, until the charcoal is completely extinguished, do not store the grill indoors or in garages with freshly used coals.

By following these simple rules, you can have a safe and enjoyable summer meal.

*Based on home safety tips courtesy of Erie Insurance. For more information please visit their website www.erieinsurance.com.

NFPA 921 & Spoliation of Evidence, by David S. Evinger


David S. Evinger

Various complimentary definitions have been given the term "spoliation of evidence." Spoliation of evidence has been described as the failure to preserve property for another's use as evidence in pending or future litigation. *Federated Mut. Ins. V. Litchfield Precision Components Inc.,* 456 N.W.2d 434, 436 (Minnesota 1990). In section 11.3.5 of the NFPA 921 2004 Edition, spoliation is described as the loss, destruction or material alteration of an object or document that is evidence or potential evidence in a legal proceeding by one who has the responsibility for its preservation.

Chapter 11 of NFPA 921 includes several sections addressing spoliation issues that are unique to origin and cause investigation in fire and explosion subrogation cases. For instance, in attempting to determine the origin and cause of a fire or explosion, it is almost always necessary to overhaul or dig out the scene in an effort to get to the point where the fire started and determine what may have started the fire. Because this necessarily involves altering the fire or explosion scene, a question arises whether this in itself is spoliation of evidence. We have found no cases that are particularly helpful in answering this question. However, it is specifically addressed in NFPA 921. As outlined in section 11.3.5.5.1 of NFPA 921 2004 Edition:

Fire investigation usually requires the movement of evidence or alteration of the scene. In and of itself, such movement of evidence or alteration of the scene should not be considered spoliation of evidence. Physical evidence may need to be moved prior to the discovery of the cause of the fire. Additionally, it is recognized that it is sometimes necessary to remove the potential causative agent from the scene and even to carry out some disassembly in order to determine whether the object did, in fact, cause the fire and which parties may have contributed to the cause.

Recognizing that safeguards need to be followed to protect the rights of those who may have an interest in the fire scene but are not available or even known at the time of the dig-out, NPFA 921 also provides as follows in section 11.3.5.3:

Efforts to photograph, document, or preserve evidence should apply not only to evidence relevant to an investigator's opinions, but also to evidence of reasonable alternate hypotheses that were considered and ruled out.

Section 11.3.5.3 of NFPA 921 goes so far as to identify for the investigator the potential ramifications if there has been spoliation of evidence. The ramifications could include potential discovery sanctions, monetary sanctions, application of adverse evidentiary inferences, limitations on use of evidence under the rules, exclusion of expert testimony, dismissal of claims or defenses, and possibly independent tort actions for the intentional or negligent destruction of evidence and even potential prosecution under criminal statutes relating to obstruction of justice.

A case that illustrates the sanctions that may be imposed when spoliation occurs is *Barker v. Bledsoe*, 85 F.R.D. 545 (W.D. Okla. 1979). During the course of a pending lawsuit destructive testing of evidence was conducted by one of the parties without notice to the other party. The court noted that modern jurisprudence no longer fosters "trial by ambush." The court held as follows:

When an expert employed by a party or his attorney conducts an examination reasonably foreseeably destructive without notice to opposing counsel and such examination results in either negligent or intentional destruction of evidence, thereby rendering it impossible for an opposing party to obtain a fair trial, it appears that the Court would be not only empowered, but required to take appropriate action, either to dismiss the suit altogether, or to ameliorate the ill-gotten advantage. A presumption as to certain evidence is simply no sufficient to protect against such conduct.

Id. At 548. The court chose not to dismiss the case on the merits, pointing out that the remedy would be too harsh for the party whose participation in the complained of actions went no further than his choice of counsel. However, the court prohibited any testimony from the person conducting the test. Costs and attorney fees were also awarded against the spoliator. *Id* at 549.

In *Smith v. Superior Court*, 198 Cal. Rptr. 829 (Cal. App. 2nd Dist. 1984), the California Court of Appeals recognized a separate tort cause of action for intentional spoliation of evidence. The defendant in the case, a Ford automobile dealer, had promised plaintiff's counsel that it would preserve certain automobile parts. The dealer, however, disposed of them, making it impossible for plaintiff's experts to inspect and test the parts to pinpoint the cause of a failure. The court compared intentional spoliation of evidence with the tort of intentional interference with a prospective business advantage and concluded that a prospective civil action in a products liability case was an economic expectancy entitled to legal protection.

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Celebrating 15 Years of Service

Congratulations to Anne Limbeck, daughter of Marc & Judeen Limbeck, a 2009 graduate of Farmington High School and recipient of the Whitemore Lead by Example Scholarship.

Check this Out!

Lead By Example Scholarships Awarded

Prior Lake Scholarship Winners

Whitemore Fire Consultants, Inc. awarded six area high school students with the "Lead by Example" scholarships, representing two high schools.

Anna Limbeck, is the daughter of Marc and Judeen Limbeck and a graduate of Farmington High School. Anna will be attending Normandale Community College, majoring in law enforcement.

Samantha Eckelman is the daughter of Steve and Linda Eckelman and graduated from Prior Lake High School. Samantha will be attending the University of Minnesota—Duluth.

Luke Lubansky is the son of Tom and Kari Lubansky and a graduate of Prior Lake High School. Luke's future plans include attending the University of Minnesota—Twin Cities.

Marissa Rieckhoff is the daughter of Greg and Lori Rieckhoff and also a graduate of Prior Lake High School. Marissa will be attending Dordt College.

Taylor Soli is the daughter of Melissa Brockenbrough and Bryan Soli and a 2009 graduate of Prior Lake High School. Taylor will be attending the University of Minnesota—Twin Cities.

Jacob Wilson is the son of Jeff and Susan Wilson and also a graduate of Prior Lake High School. Jacob will be attending Augsburg College in the fall.

Whitemore Fire Consultants, Inc. recognized these students within the class of 2009 that epitomize the characteristics of being a true leader. General H. Norman Schwarzkopf, U.S. Army, Retired, who led the American forces in Operation Desert Storm once said, "Peers select their leaders based on the character of those leaders. People want to be led by someone special." Without question, these individuals have demonstrated the values and characteristics referred to by General Schwarzkopf as someone truly "special" and someone who leads by example in their daily lives.

Congratulations to our scholarship winners. This year marks the 10th year of our scholarship awards program in which we have presented over $25,000 in continuing education

Whitemore Fire Celebrates 15th Anniversary

Can you believe it? Whitemore Fire Consultants, Inc, is celebrating its 15th anniversary in providing origin and cause investigation services!

In the coming months we will be remembering the "good ole days" with pictures from the past, staff highlights culminating in a anniversary open house next year.

To start the celebration, we all attended the Minnesota Twins v. Chicago White Sox game on July 10th, where our Twins pulled out a victory.

Thank you for your continued patronage and support. It's because of you, our clients, that we have the opportunity to celebrate this milestone.

Blitz USA Recalls Enviro-Flo™ Plus Fuel Containers Due to Fire Hazard

The U.S. Consumer Product Safety Commission, in cooperation with Blitz USA, Inc. of Miami, Oklahoma announced a voluntary recall of the Enviro-Flo Plus Fuel Containers (1 and 2 gallon container sizes). Consumers should stop using recalled products immediately unless otherwise instructed. Approximately 4,000 units were sold home improvement, mass merchandisers, automotive and various retailers nationwide from June 2009 through July 2009 for approximately $6—$10 and were manufactured in the United States.

The spout's plunger cap can dislodge which can open the seal of the fuel container and allow gasoline vapors to escape. This could cause liquid gasoline to spill from the top of the container during use and result in a fire hazard. No injuries have been reported.

The recall involves green Enviro-Flo Plus spouts used with 1 and 2 gallon fuel containers. Only spouts with manufacture date codes listed from 04/17/2009 through 04/19/2009 are included in the recall. The manufacture date code is etched into the side of the spout. The spouts were used on fuel containers with item numbers 81005 (1 gallon) and 81010 (2 gallon).

Consumers should immediately empty their gasoline container and contact Blitz for a free replacement spout delivery system. The container should not be used until the spout delivery system is replaced. Contact Blitz, Inc, at 1-888-540-5177 for additional information or visit www.blitz.com.

Recalls

Energizer Wallplate Nightlights Recalled Due to Fire Hazard

The U.S. Consumer Product Safety Commission, in cooperation with Sonco Product Company announced a voluntary recall of the Energizer Light On Demand Wallplate Nightlights. Approximately 3,000 units were sold by Energizer of St. Louis, MO and were manufactured in China.

The nightlight can overheat, especially if additional devices are plugged into its outlets, posing a fire hazard. No injuries have been reported.

The recalled wall light is white, plugs into the wall, has a plug in base into which additional devices can be plugged, and has a removable/rechargeable light/flashlight. Model LODNLWP is stamped on the back of the unit. The wall light measures about 6 inches high, 5 inches wide, and 3 inches deep. No other Light on Demand products are included in this recall. The product was sold at various other retailers nationwide and on the Web from August 2008 through July 2009 for about $26.

Consumers should immediately stop using this recalled nightlight, unplug it, and contact Energizer for information on returning the light to receive a full refund. For additional information, contact Energizer at (800) 782-2013 between 8 a.m. and 6 p.m. CT Monday through Friday, or visit the firm's Web site at: www.energizer.com

Steam Cleaners Recalled by Thane International Due to Shock and Burn Hazards

The U.S. Consumer Product Safety Commission, in cooperation with Thane International of La Quinta, CA announced a voluntary recall of the H20 Mop Consumers should stop using the product immediately unless otherwise instructed. Approximately 580,000 units were sold directly to consumers by Thane International through television infomercials; on the Web at www.thane.com; by QVC, through its televised shopping program and by retailers nationwide from June 2007 through December 2008 for about $100.

The power cord can unexpectedly wear down and expose the wiring, posing a shock and burn hazard to consumers. Thane has received 10 reports of incidents involving shock injuries and eight reports of incidents involving burn injuries.

The H2O Mop is an electrically-powered appliance for cleaning a variety of floor surfaces that uses microfiber or disposable cloths on a cleaning head through which steam is dispersed. H2O Mops are white with a purple water tank with the "H20" and "M" symbol printed on the top of the cleaning head. The model numbers of affected units are 808.092 and OEM-TV-001. This recall only includes H2O Mops with the following reference numbers printed on the label on the back of the product: 200709198 to 200803148 or H20M1000 to M-H20M1198.

Consumers should immediately stop using recalled steam cleaners and contact Thane to receive a free repair kit. Thane is sending repair kits to all consumers who purchased recalled units directly from Thane. For additional information, contact Thane anytime at (800) 485-0017 or visit the firm's Web site at: www.h2omopservice.com

NFPA 921 & Spoliation of Evidence, by David S. Evinger (continued)

Federal Rules of Evidence & Admissibility of Expert Testimony

- Definition of Relevant Evidence
- Relevant evidence generally admissible, irrelevant evidence inadmissible
- Exclusion of relevant evidence on grounds of prejudice, confusion or waste of time
- Opinion testimony by lay witnesses
- Testimony by experts
- Bases of opinion testimony by experts

Almost 15 years later, however, the California Supreme Court disapproved *Smith*. In *Cedars-Sinai Medical Center v. Superior Court,* 954 P.2d 511 (Cal. 1998), The Court expressly held that no tort cause of action exists for so-called first party intentional spoliation of evidence, where the victim knew or should have known about the alleged spoliation before the decision on the merits of the underlying action. The court expressly refused to address whether a tort action exists either for third party spoliation or for first party spoliation where the victim knew nor should have known of the spoliation until after a decision on the merits of the underlying action.

The following year, in *Temple Community Hosp. v. Superior Court*, 976 P.2d 223 (Cal. 1999), the California Supreme Court picked up where the *Cedars-Sinai* court left off and ruled, for substantially the same reasons in *Cedars-Sinai*, that no tort cause of action exists for third party spoliation. Although the court did recognize that spoliation victims have fewer existing remedies against third party spoliators than against first party spoliators, the court nevertheless ruled that existing remedies were adequate to protect potential victims of third party spoliation. The *Temple* court, however, did not address whether a tort cause of action would exist for first party intentional spoliation of evidence where the victim neither knew nor should have known of the spoliation until after a decision on the merits of the underlying action. Additionally, the *Temple* court expressly declined to determine whether a tort action will lie for negligent spoliation of evidence. These questions remain open in California after *Temple*.

> "… insurer must be certain that origin and cause investigators, forensic engineers and their attorneys are all highly qualified and experienced in handling such matters."

Despite the California Supreme Court's pronouncement on intentional spoliation of evidence, however, courts in several other states have indicated that intentional spoliation of evidence may in fact constitute a viable tort claim. *See, e.g. Hirsch v. General Motors Corp.,* 628 A.2d 1108 (N.J. Super 1993); *Smith v. Howard Johnson Co.,* 615 N.E.2d 1037 (Ohio 1993) (recognizing tort action for intentional first-party and third-party spoliation). Moreover, several other courts have indicated that a cause of action may lie for mere negligent spoliation of evidence. *See, e.g. Smith v. Atkinson,* 771 So.2d 429 (Ala. 2000); *St. Mary's Hosp., Inc. v. Brinson,* 685 So. 3d 33 (Fla. App. 1996); *Anthony v. Sec. Pac. Fin,. Servs., Inc.*75 F.3d 311 (7th Cir. 1996); *Barker v. Bledsoe,* 85 F.R.D. 545 (W.D. Okla 1979); *Holmes v. Amerex Rent-A-Car,* 180 F.3d 294 (D.C. Cir. 1999). The most common sanction for negligent spoliation of evidence is an adverse inference with respect to the evidence presented. *See, e.g. Cedars-Sinai, supra*. However, the sanctions vary from state to state and circumstance to circumstance. The California cases, and cases from other jurisdictions, indicate that the courts are also looking closely at whether independent causes of action can arise out of spoliation of evidence. This has been and will continue to be an area of development in the law.

Those involved in fire and explosion subrogation cases must be aware of the pertinent case law pertaining to spoliation of evidence, and also aware of the guidelines set out in NFPA 921 concerning spoliation. Again, failure to follow such guidelines can result in cases being dismissed, testimony excluded, or adverse inferences with respect to the evidence presented.

In pursuing subrogation recoveries in the context of fire or explosion losses, the insurer must be certain that the origin and cause investigators, the forensic engineers and their attorneys are all highly qualified and experienced in handling such matters. Everyone involved needs to be familiar with the pertinent rules of evidence and the case law that has developed over the past several years. It is also essential that all concerned be familiar with guidelines outlined in NFPA 921. Pursuing subrogation in the context of fire and explosion losses may be difficult, but the potential for a favorable recovery will be enhanced if these points are followed.

David S. Evinger is a Partner with the law firm of Robins, Kaplan, Miller & Ciresi in Minneapolis, Minnesota. The opinions expressed in this article does not necessarily reflect the opinions of Whitemore Fire Consultants, Inc, or *Inside Fire*. Mr. Evinger is also a principal of the NFPA 921 Committee.

Fiesta Recalls to Repair Gas Grills Due to Fire, Burn Hazards

The U.S. Consumer Product Safety Commission and Health Canada, in cooperation with Unisplendor Corporation of China and Keesung Corporation of China announced a voluntary recall of the Blue Ember Gas Grills imported by Fiesta Gas Grills of Dickson, Tennessee. Consumers should stop using recalled products immediately unless otherwise instructed. Approximately 88,000 units in the United States (47,000 gas grills were previously recalled in October 2008) and 25,000 in Canada and sold at various home centers and retailers nationwide from November 2006 through June 2008 for between $400 and $500 in the United States and from November 2006 through May 2009 for between $400 and $600 in Canada.

The hose of the gas tank can get too close to the firebox and be exposed to heat, posing a fire hazard to consumers. Fiesta has received 161 reports of grill fires, resulting in nine injuries, including two incidents of major burns on different parts of the body, six incidents of minor burns, and an incident involving temporary hearing loss.

This recall involves Blue Ember liquid propane (LP) outdoor grills with model and serial numbers listed below. The cabinet style grill has two doors and is silver and black or silver and gray. "Blue Ember" is printed on the grill's hood. The model and serial numbers are printed on a rating plate label on the rear of the grill. For a full listing of the model and serial numbers involved in this recall, please go to: www.cpsc.gov or www.whitemorefire.com.

For additional information, please contact Fiesta Gas Grills toll free at (866) 740-7849 between 7 a.m. and 5 p.m. CT Monday through Friday, visit the company's web site at www.blueembergrills.com or email mnorman@fiestagasgrills.com

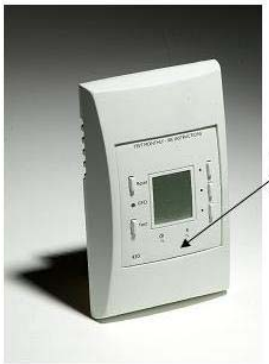
Heating System Thermostats Recalled by OJ Electronics Due to Shock Hazard

The U.S. Consumer Product Safety Commission, in cooperation with OJ Electronics of Chicago, Ill announced a voluntary recall of the 208-Volt and 240-Volt Thermostats. Consumers should stop using recalled products immediately unless otherwise instructed. Approximately 30,000 units were sold at various home improvement stores, tile shops and other retail shops nationwide from January 2004 through December 2008 for between $150 and $200 and were manufactured in Denmark.

The recalled thermostat's floor sensor or its cable can be damaged from cutting, drilling, or nailing. This poses a risk of electric shock to consumers if the power supply is not disconnected. No incidents or injuries have been reported.

The recall involves thermostats that have a built-in GFCI and are designed for use in under-floor heating systems. Thermostats included in the recall are connected to 208-Volt or 240-Volt power supplies (120V units are not included in the recall). They were sold under the brand names of Canisol, Danfoss, Elektra, Momento, OJ Microline, Raychem, Thermosoft, Warmly Yours and Warmup. The brand name is located on the front of the thermostat.

Consumers should not cut, drill or nail into the heated floor, and contact the manufacturer to arrange for a free in-home repair. For additional information, contact OJ Electronics at (800) 380-6940 between 9 a.m. and 5 p.m. CT Monday through Friday or visit the firm's Web site at: www.ojelectronics.com.



More Recalls

WHITEMORE FIRE CONSULTANTS, INC.

This Month's Q&A Tips

Q: Why am I getting "Evidence Destruction Authorization Forms" when my file has been closed for two years?

A: Every year, Whitemore Fire Consultants, Inc, conducts an Evidence Audit. Each piece of evidence is logged and entered into a database and its status is tracked over the course of the claim. Oftentimes, claims are closed and we are not informed that it is no longer necessary to retain evidence. By sending out annual reminders with status requests it helps us keep our warehouse clear of unnecessary evidence, and serves as a gentle reminder to our clients to keep us informed on the disposition of claims and any future needs that may arise.

Q: Thanks for the "Recall Updates". Will you be sending out these types of notices weekly or monthly?

A: We obtain our recall information from the Consumer Product Safety Commission. We simply forward relevant fire-related recalls as we receive them. Most often the recall notices will be sent out monthly, typically two weeks following the monthly newsletter. However, if we become aware of a more time sensitive recall, that will information will be sent out immediately. For a complete list of fire-related recalls, please visit our website:

Working to Get the Information To You

Check out next months *Inside Fire*. We are in the process of updating our database and will have exciting news to announce that will be of great assistance to you as you handle your claims.

WHITEMORE
FIRE CONSULTANTS, INC.

PO Box 1261
Prior Lake, MN 55372

952-461-7000 (Telephone)
952-461-7100 (Fax)
www.whitemorefire.com