INFORMATION Redacted PURSUANT TO THE FREEDOM OF INFORMATION ACT (FOIA), 5 U.S.C. 552(B)(6)

CEQUENT PERFORMANCE PRODUCTS, INC.

RESPONSE TO MAY 11, 2010 INFORMATION REQUEST

PE10-014

June 22, 2010

Cequent Performance Products, Inc. (formerly Cequent Towing Products, Inc.) submits the following partial response to the agency's May 11, 2010 information request. As previously discussed with and agreed to by the agency, the balance of Cequent's response will be submitted by June 29, 2010.

Request No. 1. Identify the Cequent / Reese part number that designates the hitch assembly that was involved in the above-captioned crash and/or is the subject of [redacted] vs. [redacted] *et al.*; Circuit Court of the Second Judicial Circuit in and for Leon County, Florida; Case 2006 CA 002521.

Response: For purposes of responding to this information request, Cequent understands "hitch assembly" to refer to a 1,000 pound Round Bar Style Weight Distribution Kit, as manufactured in 2005, identified as Cequent model number 61009.[1]

Request No. 2. Provide an engineering drawing that depicts the hitch assembly identified in response to Request No. 1.

Response: An "exploded view" drawing of hitch assembly model number 61009 is submitted as PE10-014 Exhibit 1 - 61009 Hitch Assembly Diagram.

Request No. 3. Identify the Cequent / Reese part number that designates the finished (fully-machined) component that constitutes the main body of the hitch assembly identified in the response to Request No. 1.

Response: Cequent understands "main body of the hitch assembly" to refer to the component known as the "casting" (and sometimes also referred to as a "head" or "adjustable ball mount"). The part numbers that designate the finished casting utilized in the hitch assembly identified in Cequent's response to Request No. 1 are as follows:

61241 (without hardware)
58112 (with hardware)

[1] There remains an issue as to whether all components of the hitch assembly in the [redacted] matter are Cequent products. The parties conducted an inspection of the subject hitch assembly in January 2008 and noted that a large section of the ball mount was missing, along with several additional components of the hitch system. Based upon the testimony of Mr [redacted] it appears that these missing components were lost shortly after the accident. The missing section of the ball mount is significant because (1) it appears to be where the fracture occurred, and (2) it is the section of the ball mount that contains the product's casting number. Without a casting number, and due to the fact that a significant portion of the ball mount is missing, Cequent is unable to confirm that the ball mount involved in the incident was a Cequent product.

Request No. 4. Identify the Cequent / Reese part number(s) that designate the rough (unmachined) casting that is used to manufacture the fully machined main body of the hitch assembly identified in response to Request No. 3.

Response: The part number that designates the rough (unmachined) casting used to manufacture the finished products identified in response to Request No. 3 is "61241R."

Request No. 5. Provide an engineering drawing that depicts the rough casting identified in the response to Request No. 4.

Response: Please see the engineering drawings submitted as PE-014 Exhibit 2 – Engineering Drawings 61241R. (These drawings are marked "Confidential Business Information" and a request for confidential treatment is being submitted to the Office of Chief Counsel.)

Request No. 6. Identify by part number, all Rough castings that

(a) preceded the rough casting identified in response to Request No. 4;
(b) succeeded the rough casting identified in response to Request No. 4;
(c) the date that each casting part number was released for production use;
(d) the date that each casting part number was withdrawn from production;
(e) a short description of the reason(s) that each part number was released or withdrawn.

Response: No rough casting preceded or succeeded part number 61241R for use in fully-cast round bar hitch systems.

Request No. 7. List each of the "finished" part numbers that Cequent / Reese has manufactured from the base casting identified in response to Request No. 4.

Response: Please see attached file entitled "PE10-014, Request Number Seven and Nine – Product Number Identification and Shipping Volume Information." (This file contains confidential business information for which a request for confidential treatment is being submitted to the Office of Chief Counsel.)

Request No. 8. For each part number listed in response to Request No. 7, provide a short description that explains the major features, characteristics, and/or details that distinguishes that hitch component from the other hitch components listed (i.e. what characteristics / functions / features distinguish each final "finished" component from another final "finished" components manufactured from the same base casting.)

Response: Please see PE10-014 Exhibit 3 - Product Descriptions, which contains catalog descriptions (2010 catalog) of 11 of the parts identified in response to Request No. 7. Cequent will supplement this response with available catalog pages for the remaining parts.

Request No. 9. For each of the "finished" part numbers identified in response to Request No. 7, provide a table that identifies the quantity of hitches sold by calendar year.

Response: Please see attached file entitled "PE10-014, Request Number Seven and Nine – Product Number Identification and Shipping Volume Information," which contains net sales data for the period 2001 through 2010 (May). Please note that Cequent does not have sales data prior to 2001. (This file contains confidential business information for which a request for confidential treatment is being submitted to the Office of Chief Counsel.)

* * *

This response is based on searches of Cequent locations where documents determined to be responsive would ordinarily be found. As a result, the scope of the search did not include, nor could it reasonably include, "all of its divisions, subsidiaries (whether or not incorporated) and affiliated enterprises and all of their headquarters, regional, zone and other offices and their employees, and all agents, contractors, consultants, attorneys and law firms and other persons engaged directly or indirectly (e.g., employee of a consultant) by or under the control of Cequent (including all business units and persons previously referred to) . . ." In the ordinary course of business, information of the type requested is transmitted to the Cequent locations that have been searched. This response was compiled and prepared by Cequent based upon a review of relevant documents obtained from various Cequent locations, and does not include documents or information generated or received at those locations subsequent to their searches.

A request for confidential treatment is being submitted to the Office of Chief Counsel for the confidential portions of this response. Accordingly, please treat this information as confidential until the Office of Chief Counsel completes its confidentiality determination.

PE10-014

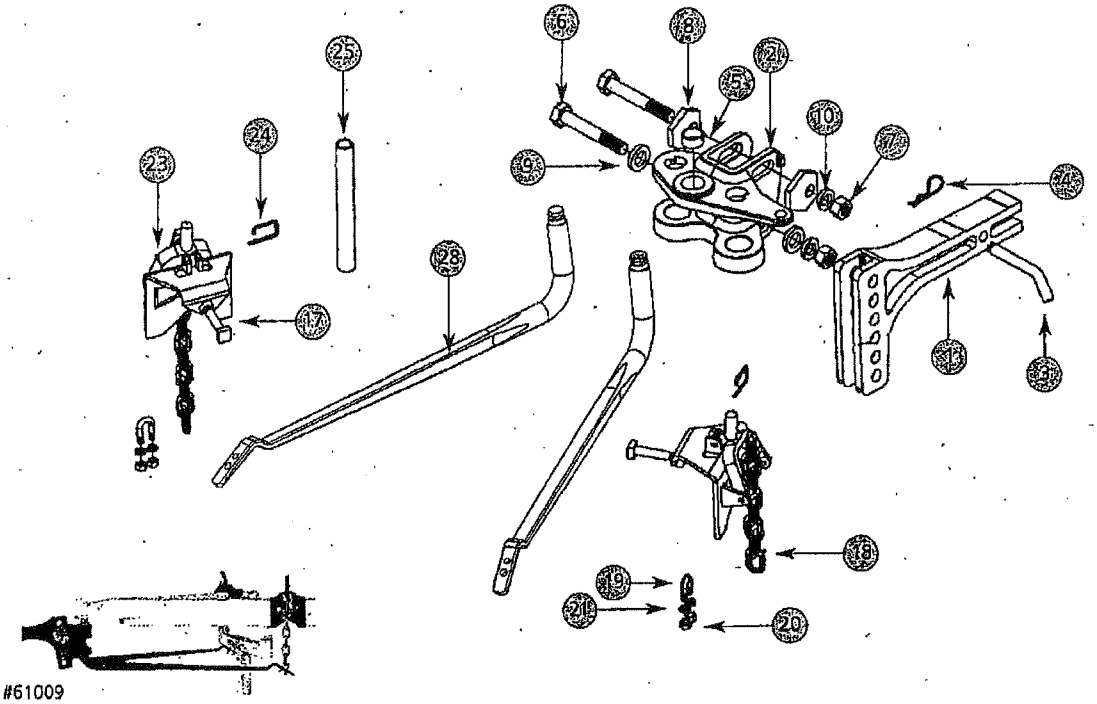
Cequent

6-18-2010

Exhibit 1 - 61009

Hitch Assembly Diagram

HEAVY-DUTY ROUND BAR



#61009

REF	PART	DESCRIPTION
	61009	Heavy-Duty Round Bar Unit
3	74055	1) Pull pin
4		1) Spring cotter pin
23	21501	1) Frame bracket assembly (snap-up)
17		1) Square head set screw (1/2"-13x3-1/2")
24		1) Safety pin
4	74056	2) Spring cotter pins
3	61214	1) Pull pin
4		1) Spring cotter pin
5		1) Small bushing
17		2) Square head set screw (1/2"-13x3-1/2")
24		2) Safety pins
19		2) U-bolts (3/8" attaches chain to spring bar)
18		2) Chains – 11 link (8/0)
21		4) Flat washers (3/8")
20		4) Lock nuts (3/8"-16)
19	55630	1) U-bolt (3/8" attaches chain to spring bar)
18		1) Chain – 11 link (8/0)
20		2) Lock nuts (3/8"-16)
21		2) Flat washers (3/8")
24	58029	2) Safety pins
19	58032	2) U-bolts (3/8" attaches chain to spring bar)
20		4) Lock nuts (3/8"-16)
21		4) Flat washers (3/8")

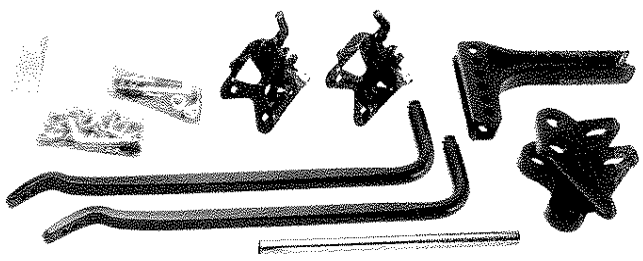
REF	PART	DESCRIPTION
17		1) Square head set screw (1/2"-13x3-1/2")
1	54970	1) Hitch bar casting (12")
5	55030	1) Small bushing
25	58162	1) Handle for snap-up bracket
2	58112	1) Ball mount
5		1) Small bushing
10		2) Split lock washers
6		2) HHC screws (3/4"-10x5")
9		2) Flat washers (3/4"-hardened)
7		2) Hex nuts (3/4"-10)
8		2) Adjustment washers
		1) Installation Instructions
28	58113	1) Spring bar – 550 lb. weight-distributing
	58114	1) Spring bar – 750 lb. weight-distributing
	58115	1) Spring bar – 1000 lb. weight-distributing
		(all bars include integrated cam)
5-10	58082	1) Hardware bag (#61224) ball mount
8	58087	2) Adjustment washers

PE10-014

Cequent

6-18-2010

Exhibit 3 - Product Description Diagram



ROUND BAR STYLE

The Round Bar Weight Distributing Hitch features easy-to-use adjusting blocks for easier and faster ball mount angle adjustment. It includes a one-piece cast head, snap-up brackets and chains; spring bars include an integrated cam for use with optional dual cam sway control.

In addition to the changes in the head, the Round Bar Weight Distributing Kit includes the highest rated spring bars per class in the industry. They also feature an integrated cam for easy set up with the optional Dual Cam High-Performance Sway Control. Other features include 9-link chains for easier set up on larger trailer frames and innovative snap-up brackets designed for superior strength and durability.

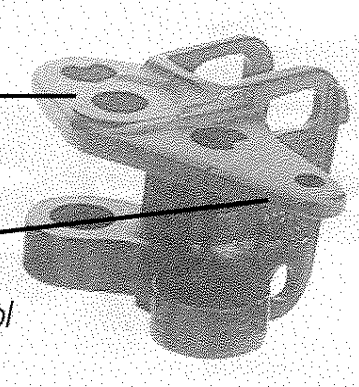
- Easy-to-use adjusting washers for head adjustment
- One piece cast head
- Rated up to 12,000 lbs. GTW and 1,200 lbs. TW
- Limited lifetime warranty

PATENTED INNOVATIVE DESIGN

Easy-to-use adjusting washer

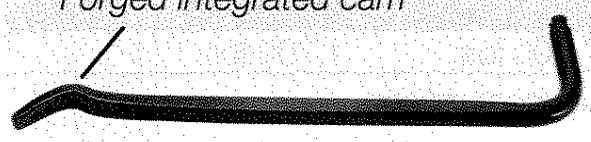
One piece cast head

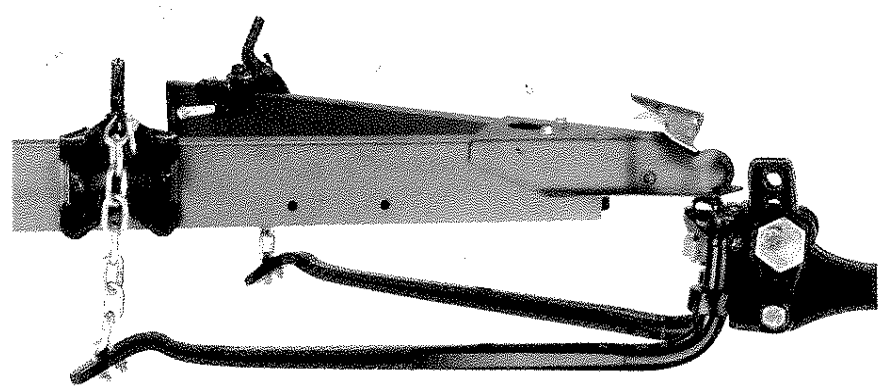
Integrated right hand sway control platform



PATENTED INNOVATIVE DESIGN

Forged integrated cam





WEIGHT DISTRIBUTION W/O HITCH BAR

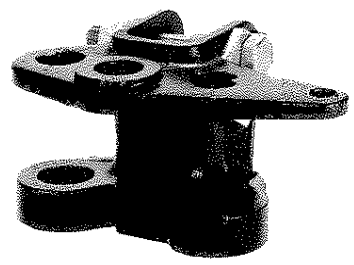
Part No.	Description	Gross Trailer Wt.	Tongue Wt.	Price
66065	Weight Distributing Hitch	10,000 lbs.	600 lbs.	
66066	Weight Distributing Hitch	10,000 lbs.	800 lbs.	
66067	Weight Distributing Hitch	12,000 lbs.	1,200 lbs.	

WEIGHT DISTRIBUTION W/HITCH BAR (54970)

Part No.	Description	Gross Trailer Wt.	Tongue Wt.	Price
65509	Weight Distributing Hitch	10,000 lbs.	600 lbs.	
67509	Weight Distributing Hitch	10,000 lbs.	800 lbs.	
61009	Weight Distributing Hitch	12,000 lbs.	1,200 lbs.	

REPLACEMENT PARTS

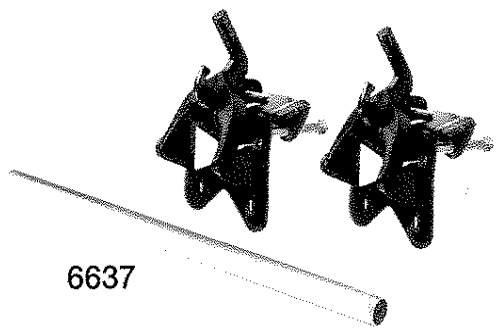
Part No.	Description	Price
58112	Adjustable Ball Mount w/hardware	
58113	600 lbs. round spring bar	
58114	800 lbs. round spring bar	
58115	1,200 lbs. round spring bar	
6637	Snap Up Bracket Assembly Kit w/handle (2-piece)	
21501	Snap Up Bracket Assembly	



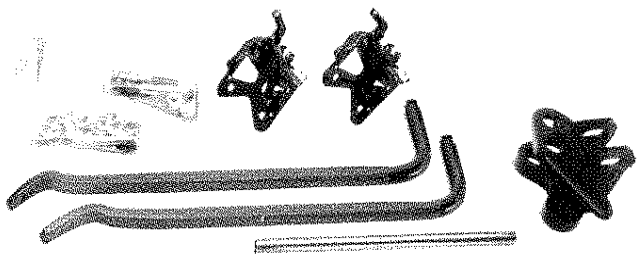
58112



58113
58114
58115



6637



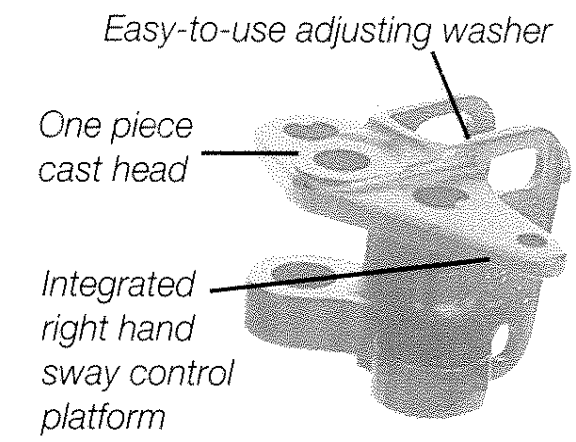
ROUND BAR STYLE

The Round Bar Weight Distributing Hitch features easy-to-use adjusting blocks for easier and faster ball mount angle adjustment. It includes a one-piece cast head, snap-up brackets and chains; spring bars include an integrated cam for use with optional dual cam sway control.

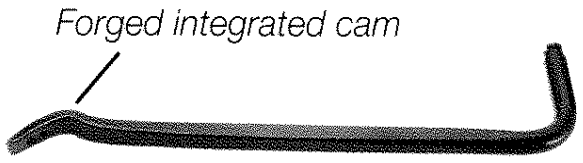
In addition to the changes in the head, the Round Bar Weight Distributing Kit includes the highest rated spring bars per class in the industry. They also feature an integrated cam for easy set up with the optional Dual Cam High-Performance Sway Control. Other features include 9-link chains for easier set up on larger trailer frames and innovative snap-up brackets designed for superior strength and durability.

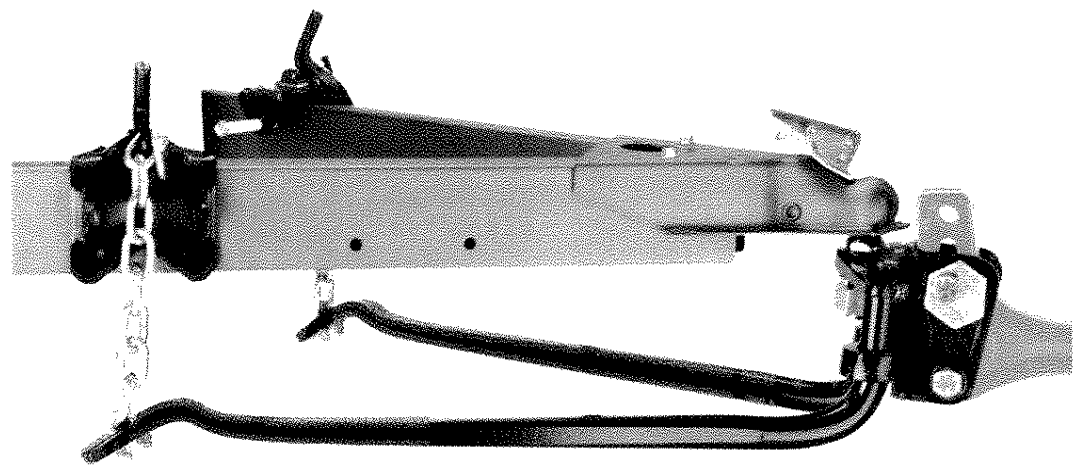
- Easy-to-use adjusting washers for head adjustment
- One piece cast head
- Rated up to 12,000 lbs. GTW and 1,200 lbs. TW
- Limited lifetime warranty

PATENTED INNOVATIVE DESIGN



PATENTED INNOVATIVE DESIGN



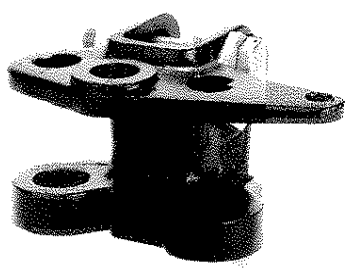


WEIGHT DISTRIBUTION W/O WD SHANK

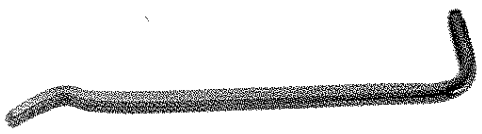
Part No.	Description	Gross Trailer Wt.	Tongue Wt.	Price
3201	Weight Distributing Hitch	10,000 lbs.	600 lbs.	
3202	Weight Distributing Hitch	10,000 lbs.	800 lbs.	
3203	Weight Distributing Hitch	12,000 lbs.	1,200 lbs.	

REPLACEMENT PARTS

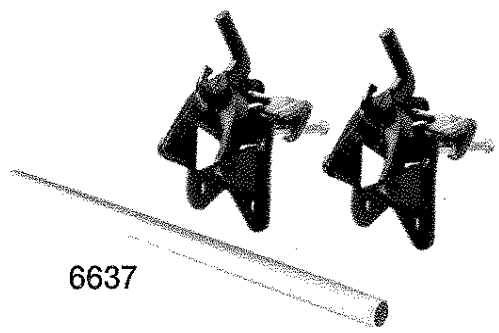
Part No.	Description	Price
6637	Snap Up Bracket Assembly Kit (qty 2) w/handle	
21501	Snap Up Bracket Assembly (qty 1)	
62112	Bolt together head assembly & hardware	
62113	600 lbs. round spring bar (qty 1)	
62114	800 lbs. round spring bar (qty 1)	
62115	1,200 lbs. round spring bar (qty 1)	



62112



62113
62114
62115



6637

PE10-014

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6-18-2010

Request Number Seven and Nine

Product Number Identification and Shipping Volume Informati

Part No.	Description	[redacted]
3201	WDH KIT 600	
3202	WDH KIT 800	
3203	WDH KIT 1200	
49112	OBS-ROUND Bar W.D. Head w/ Hardwae (HH)	
49555	Heavy Duty Rd. Bar 550LB (H.H.)	
49556	Heavy Duty Rd. Bar 750LB (H.H.)	
49557	Heavy Duty Rd. Bar 1000LB (H.H.)	
49565	Heavy Duty Rd. Bar 550LB W/O Hitch Bar (H.H.)	
49566	Heavy Duty Rd. Bar 750LB W/O Hitch Bar (H.H.)	
49567	Heavy Duty Rd. Bar 1000LB W/O Hitch Bar (H.H.)	
49575	RD Bar WD Kit 600 LB STRT	
49576	RD Bar WD Kit 800 LB STRT	
49577	RD Bar WD Kit 1200 LB STRT	
4957733	Weight Dist Hitch 1000LB Farm & Ranch	
58112	Heavy Duty Ballmount/HDW	
61009	HEAVY DUTY RD.BAR 1200 LB	
62112	ROUND BAR W.D.HEAD W/HARDWARE (DT)	
62555	HEAVY DUTY RD. BAR 550LB (D.T.)	
62556	HEAVY DUTY RD. BAR 750LB (D.T.)	
62557	HEAVY DUTY RD. BAR 1000LB (D.T.)	
62565	HEAVY DUTY RD. BAR 550LB W/O HITCH BAR (D.T.)	
62566	HEAVY DUTY RD. BAR 750LB W/O HITCH BAR (D.T.)	
62567	HEAVY DUTY RD. BAR W/O HITCH BAR 1000LB (D.T.)	
65509	HEAVY DUTY RD. BAR 600LB	
66065	HEAVY DUTY RD. BAR 600LB W/O HITCH BAR	
66066	HEAVY DUTY RD. BAR 800LB W/O HITCH BAR	
66067	HEAVY DUTY RD. BAR 1200LB W/O HITCH BAR	
67509	HEAVY DUTY RD. BAR 800LB	