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

DECLARATION IN SUPPORT OF REASONABLE INQUIRY

I, Nan Wang, solely and exclusively in my capacity as Deputy US Site Lead of Pony.ai, Inc., and not in any personal or individual capacity, certify as follows:

1. At the request and direction of Respondent Pony.ai, Inc. (hereinafter sometimes referred to as "Respondent"), I coordinated and supervised the search for, and production of, information responsive to the Special Order Directed to Pony.ai, Inc. (hereinafter the "Special Order") issued in NHTSA Recall Query 22-001. This Declaration is intended to apply to Respondent's full search and production, including its eight rolling responses and productions;

2. This is my first experience with a NHTSA Special Order, and with responding to any request for information, subpoena, discovery request, or similar order, whether issued by a government agency, in litigation, or other relevant context. I believe that most, if not all, Pony.ai personnel who substantially participated in the search for responsive documents and information also had no prior experience with such an effort. In the context of that lack of experience, and guided by legal counsel, I exercised my diligent best efforts to coordinate and supervise what I believe to be a reasonable inquiry, search for, and development of, responsive information and documents;

3. At my direction, responsible personnel at Pony.ai, Inc. have undertaken appropriate inquiries and conducted what I understand to be a reasonable and diligent search of documents and information within Respondent's custody and control for information responsive to the Special Order--within and according to the scope, parameters, and limits set forth in Respondent's objections, clarifications, constructions, interpretations, and explanations submitted to NHTSA by Pony.ai Inc.'s legal counsel and those included in each of Respondent's eight rolling productions (hereinafter collectively referred to as the "Objections");

4. Subject to the scope and limitations established by the Objections, Respondent produced, or made available, to NHTSA responsive and non-privileged information found in the inquiry and search described in the preceding paragraph. Where necessary or appropriate, Respondent also developed additional written documents and information to respond to requests in the Special Order;

5. I was not responsible for any legal judgments or decisions regarding the responsiveness of information to the Special Order;

6. It is my understanding that—subject to the Objections and their parameters and based on a reasonable search conducted by Respondent's employees— Respondent's responses to the Special Order are correct and accurate; and

7. I certify under penalty of perjury that the foregoing is true and correct.

Executed on this the 30th day of November, 2022.

PONY.AI, INC.

[redacted]

By: NAN WANG
Its: Deputy US Site Lead of Pony.ai, Inc.