

Request 2:

2. State the number of each of the following, received by Thor, or of which Thor is otherwise aware, which relate to, or may relate to, the alleged defect in the subject vehicles:
- a. Consumer complaints, including those from fleet operators;
 - b. Field reports, including dealer field reports;
 - c. Reports involving a crash, injury or fatality;
 - d. Property damage claims;
 - e. Third-party arbitration proceedings, both pending and closed, where Thor is or was a party to the arbitration; and
 - f. Lawsuits, both pending and closed, in which Thor is or was a defendant or codefendant.

For subparts “a” through “f,” state the total number of each item (e.g., consumer complaints, field reports, etc.) separately. Multiple incidents involving the same vehicle are to be counted separately. Multiple reports of the same incident are also to be counted separately (i.e., a consumer complaint and a field report involving the same incident in which a crash occurred are to be counted as a crash report, a field report and a consumer complaint).

In addition, for items “c” through “f,” provide a summary description of the alleged problem and causal and contributing factors and Thor's assessment of the problem, with a summary of the significant underlying facts and evidence. For items “e” and “f,” identify the parties to the action, as well as the caption, court, docket number, and date on which the complaint or other document initiating the action was filed.

Response:

- a) There have been eight (8) consumer complaints.
- b) There have been zero (0) field reports.
- c) Reports and summary of crashes, injuries, and fatalities:
 - a. There have been three (3) reports of a crash.
 - i. The common theme is that the hitch broke along the 90-degree bend leaving the bolted portion of the hitch attached to the motorhome.
 - ii. In all cases a vehicle was being flat towed behind the motorhome at the time of the incident.
 - b. There has been zero (0) report of injuries.
 - c. There have been zero (0) reports of fatalities.
- d) There have been three (3) reports of property damage.
 - a. The property damage to the motorhomes is a broken hitch and some minor body repair. The vehicles which were being flat towed suffered body damage which needed repaired.
- e) There have been zero (0) arbitration proceedings.
- f) There have been zero (0) lawsuits.

Source: TMC's ERP System (Dynamics AX)

Last date Information was gathered: 10/29/24