

Request 4:

4. Produce copies of all documents related to each item within the scope of Request No. 2. Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and describe the method Thor used for organizing the documents. Describe in detail the search methods and search criteria used by Thor to identify the items in response to Request No. 2.

Response:

TMC's IT department did a search in our CRM, for calls and customer correspondence that had hitch in the subject. Each case was reviewed to determine the reason for the call or correspondence. If the call or correspondence was related to, or could be related to, the alleged defect in the subject units all the requested documentation was pulled from the cases that were created from the calls or correspondence.

The documents are arranged in separate folders by the last 6 digits of the VIN. Each folder contains a Summary of the communications with the associated owner.

Source: TMC's ERP System (Dynamics AX)

Last Date Information was gathered: 10/30/24