

Response to Request No. 11

Phoenix has never designed, manufactured nor sold battery packs or battery modules. The battery designer, manufacturer and supplier may be able to assess this issue which Phoenix believes to be Proterra, or its successor entity. Furthermore, Phoenix has not made any modifications or changes to the design, material composition, manufacture, quality control, supply and/or installation of the subject component. As such, the requested information in subparts (a) to (h) in this Request is not in the possession of Phoenix. To the best of Phoenix's knowledge, this data may be found with the battery manufacturer (which Phoenix believes to be Proterra or its successor entity).