

9. Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject vehicles, that Phoenix has issued to any dealers, regional or zone offices, field offices, fleet purchasers, or other entities. This includes, but is not limited to, bulletins, advisories, informational documents, training documents, or other documents or communications, with the exception of standard shop manuals. Also include the latest draft copy of any communication that Phoenix is planning to issue within the next 120 days.

#### Response to Request No. 9

Phoenix will produce all responsive, available records into "FOLDER NUMBER 9" in the data room. (Note that some of these documents were previously produced as relating to the recall 22V887.) Phoenix does not have any dealer documents in its possession, custody or care. Phoenix does not have any draft communication that Phoenix plans to issue in the next 120 days.