

11. Describe all modifications or changes made by, or on behalf of, Phoenix in the design, material composition, manufacture, quality control, supply, or installation of the subject component, from the start of production to date, which relate to, or may relate to, the alleged defect in the subject vehicles. For each such modification or change, provide the following information:

- a. The date or approximate date on which the modification or change was incorporated into vehicle production;
- b. A detailed description of the modification or change;
- c. The reason(s) for the modification or change;
- d. The part number(s) (service and engineering) of the original component;
- e. The part number(s) (service and engineering) of the modified component;
- f. Whether the original unmodified component was withdrawn from production and/or sale, and if so, when;
- g. When the modified component was made available as a service component; and
- h. Whether the modified component can be interchanged with earlier production components.

Also, provide the above information for any modification or change that Phoenix is aware of which may be incorporated into vehicle production within the next 120 days.

#### 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).

