

12. State the number of each of the following that Phoenix has sold that may be used in the subject vehicles by component name, part number (both service and engineering/production), model and model year of the vehicle in which it is used and month/year of sale (including the cut-off date for sales, if applicable):

a. Subject components; and

b. Any kits that have been released, or developed, by Phoenix for use in service repairs to the subject component/assembly.

For each component part number, provide the supplier's name, address, and appropriate point of contact (name, title, and telephone number). Also identify by make, model and model year, any other vehicles of which Phoenix is aware that contain the identical component, whether installed in production or in service, and state the applicable dates of production or service usage.

Response to Request No. 12

At no time did Phoenix ever design, manufacture, sell or install any Subject Components into any Subject Vehicles and has not designed, manufactured, sold nor installed any such kits for any Subject Components.