

## **EXHIBIT B – Requests from Debtors**

1. All contracts, drafts of contracts, and other proposals, offers or other correspondence regarding the purchase of any of goods and/or services by any and/or all of their customers from the Debtors for the six year period prior to the Petition Date for which the Debtors generated revenue in excess of \$10 million per year;
2. All contracts, drafts of contracts, and other proposals, offers or other correspondence regarding the purchase of any goods and/or services by any and/or all of their customers from the Debtors post-petition for which the Debtors are projected to generate revenue in excess of \$10 million per year;
3. All documents, analyses, and other compilations regarding the goods and/or services provided by the Debtors to any and/or all of their customers for the six year period prior to the Petition Date for which the Debtors generated revenue in excess of \$10 million per year;
4. All documents evidencing payments from any and/or all of the Debtors' customers to the Debtors for the six year period prior to the Petition Date from whom the Debtors generated revenue in excess of \$10 million per year;
5. All documents evidencing the delivery of goods and/or services by the Debtors to any and/or all of their customers for the six year period prior to the Petition Date from whom the Debtors generated revenue in excess of \$10 million per year;
6. All correspondence by and among the Debtors and any and/or all of their customers concerning the Debtors for the one year period prior to the Petition Date;
7. All contracts, drafts of contracts, other proposals, offers or correspondence regarding post-petition financing for the Debtors;
8. All documents regarding any discussions or correspondence with any and/or all of their customers regarding the renegotiation of contracts for the past two years;
9. Copies of the Debtors' business plans for the six years prior to the Petition Date and for post-petition periods;
10. All documents, analyses and correspondence relating to the valuation of the Debtors' businesses for the six years prior to the Petition Date and for post-petition periods;
11. All documents, analyses and correspondence relating to the value of the Debtors' contracts with their customers for the six years prior to the Petition Date and for post-petition periods;
12. All documents and analyses regarding the Debtors' profitability for each plant for any and all product lines for the six years prior to the Petition Date and for post-petition periods;

13. All documents, analyses and correspondence regarding capital expenditures and/or tooling costs by plant and allocation by program greater than \$5 million on an annualized basis for the six years prior to the Petition Date and for post-petition periods;

14. All documents, analyses and correspondence regarding costs of material by plant and allocation by program for amounts greater than \$5 million on an annualized basis for the six year period prior to the Petition Date and for post-petition periods;

15. All documents and correspondence regarding hedging agreements related to raw materials including, but not limited to, historical prices and any and/or all purchase agreements with any and/or all suppliers for amounts greater than \$5 million on an annualized basis for the six year period prior to the Petition Date and for post-petition periods;

16. All documents and correspondence regarding any and/or all of the Commercial Recovery Projects with any and/or all of their customers that were received on June 7, 2005;

17. All documents, analyses and correspondence regarding contract bidding strategy and/or bidding procedures for the six year period prior to the Petition Date and for post-petition periods;

18. All documents, analyses and correspondence relating to profitability analysis (i) at the time the contracts were bid upon and (ii) during the time since the contracts were awarded by any and/or all of the Debtors' customers for the six year period prior to the Petition Date and for post-petition periods;

19. All documents, analyses and correspondence relating to any and all lease arrangements for any and all facilities and/or plants including, but not limited to, all basic lease terms and any and all applicable renewal and/or purchase rights;

20. All documents, analyses and correspondence relating to the calculation of raw material reimbursement requests made to any and/or all of their customers on June 7, 2005.

## **EXHIBIT C – Requests from Principal Customers/Principal Customers' Professionals**

1. All contracts, drafts of contracts, and other proposals, offers or other correspondence regarding the purchase of any goods and/or services by the Principal Customers from the Debtors including all amendments, for the six year period prior to the Petition Date and for post-petition periods for which the Debtors generated in excess of \$10 million on an annualized basis and for post-petition periods;
2. All documents, analyses, and other compilations regarding the goods and/or services provided by the Debtors to the Principal Customers for the six year period prior to the Petition Date and for post-petition periods for which the Debtors generated in excess of \$10 million on an annualized basis and for post-petition periods;
3. All documents evidencing payments from the Principal Customers to the Debtors for the six year period prior to the Petition Date and for post-petition periods for which the Debtors generated in excess of \$10 million on an annualized basis;
4. All documents evidencing the delivery of goods or services by the Debtors to the Customer for the six year period prior to the Petition Date;
5. All correspondence by and among the Principal Customers and any other party (including, without limitation, other customers of the Debtors, the Principal Customers' professional advisors and the Debtors) concerning the Debtors for the two year period prior to the Petition Date and for post-petition;
6. All contracts, drafts of contracts, other proposals, offers or correspondence regarding the purchase of goods and/or services from any supplier similar to those goods and/or services substitutable for the goods and/or services provided by the Debtors to the Principal Customers for the six year period prior to the Petition Date and for post-petition periods.
7. All contracts, drafts of contracts, other proposals, offers or correspondence regarding the Debtors' need for post-petition financing;
8. All documents regarding any discussions or correspondence with the Debtors or any of the Principal Customers regarding the renegotiation of contracts with the Debtors;
9. All documents and correspondence regarding any and/or all of the Commercial Recovery Projects with the Debtors that were received on June 7, 2005.
10. All documents, analyses and correspondence regarding contract bidding strategy or bidding procedures;
11. All documents, analyses and correspondence regarding other bids received by the Customer for goods and/or services provided by the Debtors to Principal Customers;
12. All documents, analyses and correspondence relating to pricing data for any and/or all contracts with other suppliers including, but not limited to, Lear and JCI;

13. All documents, analyses and correspondence relating to the valuation of the Debtors' businesses for the six year period prior to the Petition Date and for post-petition periods;