

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
MUNICIPAL DEPARTMENT, FIRST DISTRICT

Yuling Zhan,)
Plaintiff)
V.) No: 04 M1 23226
Napleton Buick Inc,)
Defendant)

EXCERPTS OF DEFENDANT'S JUNE, 14, 2006 RESPONSE

TO FIRST SET OF INTERROGATORIES

1. Interrogatories No. 5

How did each of your employees communicate with plaintiff during her purchase of the subject car on September 4, 2003? Identify all persons who were present on the scene including but not limited to all your employees including former employees, and identify all communications between any person at defendant and plaintiff during the purchase. To answer this interrogatory, please identify the person who took part in the test drive with plaintiff, the communication during the test drive and the route of the test drive, the person(s) who handed over purchase papers to plaintiff and all the communications, then and there.

Defendant's answer:

Defendant's employees communicated with Plaintiff orally during the purchase of the subject car on September 4, 2003. Defendant is not aware of all persons present at the scene and/or all persons who communicated with Plaintiff during her purchase of the vehicle. However,

Defendant assumes Hector Portillo, the salesperson, had communication with Plaintiff during the sale, including during the test drive. Defendant does not know the route of the test drive or who, specifically, handed papers to Plaintiff, if anyone. Any written communications, which occurred during the purchase of the subject car on September 4, 2003, were produced in accordance with Defendant's First Response to Plaintiff's Request to Produce Documents. Additional statements by Defendant can be found in letters previously produced at D000007 and D000012. (Emphasis added.)

2. Interrogatories No. 7

Was the subject car sold to plaintiff with any warranty of consistent and specific terms? If so, Identify the person(s) who showed and explained the Buyer's Guide to plaintiff and all persons who were on the scene; describe when, where and how the person(s) did these before and during plaintiff made the purchase decision. Identify the person who received phone call from plaintiff in the afternoon of September 4, 2003, regarding the warranty paper, all communication between that person and plaintiff; all other persons who were present at defendant and had knowledge of above-mentioned communication, describe in detail what that person did afterwards; and identify all communications Buick made to any person(s) including plaintiff from September 10, 2003 to December 22, 2004, which explicitly indicated the subject car was under any kind of warranty. .

Defendant's answer:

An example of the Limited Warranty identified in the Buyer's Guide is produced at D000016. Defendant's employees communicated with Plaintiff orally during the purchase of the subject car on September 4, 2003. Defendant is not aware of all persons present at the scene and/or all persons who communicated with Plaintiff during the purchase of the vehicle, or what said person did following any such communication.

However, Defendant assumes Hector Portillo, the salesperson, had communications with Plaintiff during the sale, including during the test drive. (Emphasis added.)

3. Interrogatories No. 9

After the car in dispute stalled at highway speed on September 8, 2003, plaintiff and/or some other person called Buick to tow back the car. Identify the person(s) who received the calls before and after towing back the subject car, the communications between that person(s) at defendant and plaintiff or any other person, each of all persons at defendant who was notified and all communication before and after towing back the subject car on September 8, 2003.

Defendant's answer:

Defendant specifically denies that the subject vehicle stalled at highway speed on September 8, 2003. Defendant is not aware of the person (if any) who received calls, and refers to all written communication previously produced at D 000007 and D 000012. (Emphasis added.)