

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

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

**EXCERPT OF DEFENDANT'S JUNE, 14, 2006 RESPONSE**

**TO THE FIRST SET OF INTERROGATORIES**

**Interrogatory No. 17:**

Did defendant have any communication with any person(s) other than plaintiff regarding the subject car out of Court from September 10, 2003 to the present day? If so, identify and produce all documents and/or records of communication (whether oral, electronic or other means), including but without limitation all letters, diaries, calendars, desk pads, and computer back-up files, which should indicate the date and time, place and circumstance of the communication, participants of the communication and/or author(s) of documents. Here "person(s)" should include natural persons, government agencies, companies etc, as defined in Exhibit A.

**Defendant's answer:**

*Defendant engaged in privileged communications with its counsel, and communicated with the Illinois Attorney General (see correspondence previously produced at D000012). Communications regarding the status of the vehicle between Mr. D'Andrea and Bob Caridi also occurred in Plaintiff's presence during inspection of the subject vehicle on April 11, 2005.*

**EXHIBIT H**