

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. 6:

Was there an official copy of a Buyer's Guide on each of used cars defendant sold or intended to sell in 2003? If so, identify the number, content, location of the Buyer's Guides before and after each sale, the author(s) of the Buyer's Guides and when they were prepared, the person(s) requested that they be prepared, the person(s) at defendant who handled the official copies of the Buyer's Guides before, during and after each purchase in 2003.

Defendant's Answer:

The Buyer's Guide was on the back, passenger-side window of the vehicle before the sale, consistent with Defendant's custom and practice. The Buyer's Guide was removed and provided to the Plaintiff after the sale, also consistent with Defendant's custom and practice. It is unknown who,

specifically, handed papers to Plaintiff, if anyone. The Buyer's Guide form was completed by Charles Rollins, who was then working in the Used Car Department, consistent with Defendant's custom and practice. More than 1 copy of the Buyer's Guide may be available, as one was used as a prototype, consistent with Defendant's custom and practice with cars purchased from Precision Motors. The Buyer's Guide provided to Plaintiff is produced at D000014 and D000015 (reverse side). (Emphasis added.)