

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

2006 MAY 16 PM 3:33

YULING ZHAN,

Plaintiff,

v.

NAPLETON BUICK, INC., and
FORD MOTOR COMPANY,

Defendants.

DO NOT WRITE IN THESE SPACES
CLERK OF THE CIRCUIT COURT
OF COOK COUNTY, ILLINOIS

No. 04 M1 23226

**DEFENDANT'S SUPPLEMENTAL RESPONSE TO PLAINTIFF'S FIRST SET OF
REQUESTS FOR ADMISSIONS NUMBERS 6, 9, 20 AND 42**

Defendant, D'ANDREA BUICK, INC., (formerly known as Napleton Buick, Inc.) (hereinafter "Defendant"), by and through its attorneys, Childress Duffy Goldblatt, Ltd., and for its Supplemental Response to Plaintiff's First Set of Requests for Admissions Numbers 6, 9, 20 and 42, states as follows:

6. As a car dealership, Buick has the duty to inspect every car before sale.

Response: Defendant admits that it owes a duty to inspect vehicles, only the extent that such a duty is imposed by law or agreement. Defendant denies all remaining allegations contained within this Request to Admit.

9. There were maintenance records on the subject car. The car in dispute (VIN I FAFP53SOXG 06195) was repaired on 7/5/2001, 5/21/2003, and 6/26/2003. The odometer reading on 6/26/2003 was 24514 miles. See <http://www.carfax.com> or <http://www.autocheck.com>. Buick failed to disclose such information during the sale.

Response: Defendant admits maintenance records relative to the subject vehicle exist. Defendant affirmatively states that the mileage on the car on or about October 6, 2003 was

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