

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

YULING ZHAN,

Plaintiff,

v.

NAPLETON BUICK, INC.,

Defendant.

2006 JUN 14 11 3: 29  
CLERK OF COURT  
No. 04 M1 23226

**SUPPLEMENTAL RESPONSE TO PLAINTIFF'S  
REQUEST FOR PRODUCTION OF DOCUMENTS**

NOW COMES Defendant, D'ANDREA BUICK, INC., f/k/a/ NAPLETON BUICK, INC. (hereinafter "Defendant"), by and through its attorneys, CHILDRESS DUFFY GOLDBLATT, LTD., and for its Supplemental Response to Request to Produce Documents, states as follows:

4. Produce all documents, which show repair records and invoices for each of all cars Buick sold but brake down during warranty period, for each of the last five years.

**RESPONSE:** Defendant is in possession of inspection and repair documents pertaining to the subject vehicle, produced at D 000017 through D 000020.

7. Produce all documents and records from local telephone company for each occasion Buick asserts it called plaintiff or sent a fax to plaintiff from September 10, 2003 to December 22, 2004.

**RESPONSE:** Defendant is not in possession of any such documents.

9. Produce all documents or records of communication (whether oral, electronic or other means) between Mr. Nicholas J, DAndrea and other person(s) regarding the sale of the subject car on September 4, September 8, September 9, September 10 of 2003 and thereafter.