

The documents should include but is not limited to the locations at which the communications took place, and the means of communication (oral, telephone conversation etc.) and date, time and content of each communication.

**RESPONSE:** See correspondence previously produced at D 000007 and D000012.

10. Produce all documents and records of communication (whether oral, electronic or other means) between Mr. Ed Earley and other person(s), created by Mr. Ed Earley in the capacity of his employment at defendant from September 4 to December 31, 2003. The records should include but is not limited to the locations at which the communications took place, the means of communication (oral, telephone conversation etc.), computer back-up files, and date, time and content of each of all communications.

**RESPONSE:** See correspondence previously produced at D 000007 and D000012.

11. Produce all record of communication (whether oral, electronic or other means) between Mr. Bob Caridi and other person(s) regarding the sale of the subject car on September 4, September 8, September 9 and September 10, of 2003 and thereafter. The records should include but is not limited to the location at which the communications took place, and the means of communication (oral, telephone conversation etc.) and date, time and content of each communication.

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

12. Produce true and exact copies of the original "Buyer's Guides" for each of all used cars defendant sold or intended to sell in 2003, please include the information regarding the dates the documents were created and the author(s) of the documents.

**RESPONSE:** The Buyers Guide is produced at D 000014 and D 000015.