

13. Produce all documents related to the transaction between Buick and previous owner of the car in dispute.

RESPONSE: The subject vehicle was purchased from Precision Motors. Defendant is not in possession of any such documents, other than those previously produced at D 000001 and D 000002.

20. Produce a set of copies of written motion, notice of motion, certificate of service for Buick's request of car keys in the Court.

RESPONSE: In addition to documents previously produced, Defendant is in possession of documents produced at D 000020 through D 000041, which include:

- Correspondence between counsel for Defendant and Plaintiff, dated February 28, 2005, March 9, 2005, March 14, 2005, March 15, 2005 and May 17, 2005;
- Orders dated March 16, 2005 and March 30, 2005; and
- Motions dated on or about March 21, 2005, April 6, 2005, and April 15, 2005.

21. Produce a set of copies of written motion, notice of motion, certificate of service for Buick's request to withdraw jury in the Court.

RESPONSE: Defendant is in possession only of the order dated October 20, 2005, produced at D 000042.

29. Produce all documents produced by defendant in any other litigation, where defendant's business practice and credibility are or were at issue.

RESPONSE: Defendant is in possession of documents, which will be produced in accordance with this Court's Order regarding same. See Defendant's Motion for Leave to File, for Protective Order and for In Camera Inspection.