

inspection, and are being produced at D 000017 through D 000020. An inspection of the subject vehicle was conducted on or about April 11, 2005, by Bob Caridi of Lou's Auto Maintenance & Repair (Chicago, IL) which revealed problems due to exposure to the elements and an empty gas tank. The cause of the alleged stall of the vehicle was not identified. Defendant is not in possession of any documents related to that inspection.

9. After the car in dispute stalled at highway speed on September 8, 2003, plaintiff and/or some other person call Buick to tow back the car. Identify the person(s) who received the calls before and after towing back the subject car, the communications between that person(s) at defendant and plaintiff or any other person, each of all persons at defendant who was notified and all communications before and after towing back the subject car on September 8, 2003.

ANSWER: Defendant specifically denies that the subject vehicle stalled at highway speed on September 8, 2003. Defendant is not aware of the person (if any) who received calls, and refers to all written communication previously produced at D 000007 and D 000012.

10. Did plaintiff misuse the car? If so, identify and list all the ways in which plaintiff misused the car to cause engine stalling at highway speed, provide all documentation related to this issue defendant created from September 8, 2003 to December 22, 2004, from December 22, 2004 to April 1, 2005 and from April 1, 2005 to the present day, respectively.

ANSWER: Yes. Upon information and belief, Plaintiff's misuse includes, but is not limited to, failure to maintain sufficient fuel in the vehicle. Defendant is not in possession of any documents related to Plaintiff's use or misuse of the subject vehicle.

12. On September 9, 2003, plaintiff sent Buick a fax and a letter, asking Buick's response by fax in three days. Did Buick fax, call plaintiff, or send certified mail to plaintiff afterwards? If so, identify all faxes or phone calls Buick made trying to reach plaintiff ever since,