

including the date, time and the person(s) who made the attempts on each of all occasions, identify and produce all documents, including but not limited to records from telephone company; all certificate letter receipts and other mailing proof for the time period of September 8, 2003 to December 22, 2004.

ANSWER: Defendant attempted to phone plaintiff, as indicated in letters previously produced at D 000007 and D 000012. Defendant is not in possession of any other documents related to attempts to contact Plaintiff other than documents previously produced.

13. Did any person(s) working for defendant access, or inspect, or repair the subject car and/or alter its condition in any way from September 8, 2003 to the present day? If so, please identify the person(s) who was responsible for the control of day-to-day access to the subject car, the person(s) who accessed, inspected, or repaired the subject car and/or altered its condition, and all persons on the scene on such occasion(s) before and after April 1, 2005. To answer this interrogatory, please identify and describe step-by-step procedure, each of all vehicle part(s) accessed, or inspected, or repaired and/or altered; identify and produce all the related records and documents.

ANSWER: A general 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. The car has been unmoved from the location to which it was towed, namely, Defendant's outdoor lot. A tarp was placed over the car when a damage to a window was discovered (Summer/Fall 2005), presumptively the result of vandalism.

15. What is your estimate of the market value for the subject car before and after plaintiff's purchase? Please provide the market value of the subject car if maintenance record