

was disclosed on September 4, 2003, the market value of the car after it stalled at highway speed at 60 miles/hr if such information would be fully disclosed to a potential buyer, the market value when safety recall information is fully disclosed to the public, the market value of the subject car at the present day. For each instance, please list dealer's purchasing prices and selling prices for the market value and identify any documents and/or any basis for your estimate.

ANSWER: The estimated market value of the subject vehicle prior to Plaintiff's purchase was approximately \$7,000.00, before retail sales tax and other taxes/fees. Defendant does not believe there was a difference in market value for the subject vehicle after it allegedly stalled. Presently, the car has no market value other than salvage value (if any), as it has been left by its owner, exposed to the elements for nearly three years.

17. Did defendant have any communication with any person(s) other than plaintiff regarding the subject car out of Court from September 10, 2003 to the present day? If so, identify and produce all documents and/or records of communication (whether oral, electronic or other means), including but without limitation all letters, diaries, calendars, desk pads and computer back-up files, which should indicate the date and time, place and circumstances of the communication, participants of the communication and/or author(s) of documents. Here, "person(s)" should include natural persons, governmental agencies, companies etc. as defined in Exhibit A.

ANSWER: Defendant engaged in privileged communications with its counsel, and communicated with the Illinois Attorney General (see correspondence previously produced at D 000012). Communications regarding the status of the vehicle between Mr. D'Andrea and Bob Caridi also occurred in Plaintiff's presence during the inspection of the subject vehicle on April 11, 2005.