

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
MUNICIPAL DEPARTMENT, FIRST DISTRICT

YULING ZHAN,

Plaintiff,

v.

NAPLETON BUICK, INC.,

Defendant.

No. 04 M1 23226

SUPPLEMENTAL ANSWERS TO PLAINTIFF'S INTERROGATORIES

NOW COMES Defendant, D'ANDREA BUICK, INC., f/k/a/ NAPLETON BUICK, INC. (hereinafter "Defendant"), by and through its attorneys, CHILDRESS DUFFY GOLDBLATT, LTD., and for its Supplemental Answers to Plaintiff's Interrogatories, states as follows:

5. How did each of your employees communicate with plaintiff during her purchase of the subject car on September 4, 2003? Identify all persons who were present on the scene including but not limited to all your employees including former employees, and identify all communications between any person at defendant and plaintiff during the purchase. To answer this interrogatory, please identify the person who took part in the test drive with plaintiff, the communication during the test drive and the route of the test drive, the person(s) who handed over purchase papers to plaintiff and all the communications, then and there.

ANSWER: Defendant's employees communicated with Plaintiff orally during the purchase of the subject car on September 4, 2003. Defendant is not aware of all persons present at the scene and/or all persons who communicated with Plaintiff during her purchase of the vehicle. However, Defendant assumes Hector Portillo, the salesperson, had communications with Plaintiff during the sale, including during the test drive. Defendant does not know the route of