

the test drive or who, specifically, handed papers to Plaintiff, if anyone. Any written communications which occurred during the purchase of the subject car on September 4, 2003, were produced in accordance with Defendant's First Response to Plaintiff's Request to Produce Documents. Additional statements by Defendant can be found in letters previously produced at D 000007 and D 000012.

6. Was there an official copy of a Buyer's Guide on each of used cars defendant sold or intended to sell in 2003? If so, identify the number, content, location of the Buyer's Guides before and after each sale, the author(s) of the Buyer's Guides and when they were prepared, the person(s) requested that they be prepared, the person(s) at defendant who handled the official copies of the Buyer's Guides before, during and after each purchase in 2003.

**ANSWER:** The Buyer's Guide was on the back, passenger-side window of the vehicle before the sale, consistent with Defendant's custom and practice. The Buyer's Guide was removed and provided to the Plaintiff after the sale, also consistent with Defendant's custom and practice. It is unknown who, specifically, handed papers to Plaintiff, if anyone. The Buyer's Guide form was completed by Charles Rollins, who was then working in the Used Car Department, consistent with Defendant's custom and practice. More than 1 copy of the Buyers Guide may be available, as one was used as a prototype, consistent with Defendant's custom and practice with cars purchased from Precision Motors.. The Buyers Guide provided to Plaintiff is produced at D 000014 and D 000015 (reverse side).

7. Was the subject car sold to plaintiff with any warranty of consistent and specific terms? If so, identify the person(s) who showed and explained the Buyer's Guide to plaintiff and all persons who were on the scene; describe when, where and how the person(s) did these before and during plaintiff made the purchase decision. Identify the person who received phone call