

from plaintiff in the afternoon of September 4, 2003, regarding the warranty paper, all communication between that person and plaintiff; all other persons who were present at defendant and had knowledge of above-mentioned communication, describe in detail what that person did afterwards; and identify all communications Buick made to any person(s) including plaintiff from September 10, 2003 to December 22, 2004, which explicitly indicated the subject car was under any kind of warranty.

ANSWER: An example of the Limited Warranty identified in the Buyers Guide is produced at D 000016. 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, or what said persons did following any such communications. However, Defendant assumes Hector Portillo, the salesperson, had communications with Plaintiff during the sale, including during the test drive.

8. Did Buick perform inspection and/or mechanical check-up before and during plaintiff's purchase? If so, identify all person(s) who performed the inspection and/or mechanical check of the car in dispute; describe qualification for each of them (training, education, license or certification background etc.); describe what each of them did in details during the inspection test and mechanical check-up; identify and produce all documents and record(s) of the inspection and mechanical check-up.

ANSWER: Defendant purchased the subject vehicle from Precision Motors (Oak Lawn, IL), which, upon information and belief, performed service on the vehicle. Upon purchase by Defendant, the vehicle was inspected by a General Motors Certified, journeyman mechanic. A Used Inspection Vehicle Form and a Work Order were prepared in conjunction with the