

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

YULING ZHAN,

Plaintiff,

v.

NAPLETON BUICK, INC., and
FORD MOTOR COMPANY,

Defendants.

No. 04 M1 23226

**DEFENDANT'S RESPONSE TO
PLAINTIFF'S FIRST SET OF REQUESTS FOR ADMISSIONS**

NOW COMES the Defendant, D'ANDREA BUICK, INC., (erroneously sued as NAPLETON BUICK, INC.) (hereinafter "Defendant"), by and through its attorneys, the law firm of CHILDRESS DUFFY GOLDBLATT, LTD., and for its Response to Plaintiff's First Set of Requests for Admissions, within 28 days after being served, states as follows:

GENERAL OBJECTIONS

A. Defendant generally objects to all the statements contained in Plaintiff's First Set of Requests for Admissions to the extent they call for information protected from disclosure by the attorney-client privilege, work product doctrine or any other applicable privilege.

B. Defendant generally objects to the Requests' Instructions and Definitions to the extent they purport to impose obligations beyond those permissible under Illinois Supreme Court Rule 201, and other applicable rules.

RESPONSES

1. Plaintiff has incorporated instructions into the first set of request for admission, See Exhibit A.