

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

Yuling Zhan,)
Plaintiff)
V.) No: 04 M1 23226
Napleton Buick Inc,)
Defendant)

PLAINTIFF'S MOTION FOR LEAVE TO CONDUCT DISCOVERY

Plaintiff, Yuling Zhan, respectfully submits this motion, pursuant to Illinois Supreme Court Rule 201, and states as follows:

1. On December 21, 2004, plaintiff filed the instant lawsuit, and raised a variety of claims against a car dealership, Napleton Buick Inc. ("Buick).
2. On November 8, 2005 the Court ordered defendant Buick to file an Answer. See Exhibit 1 at 2.
3. On November 3, 2005 plaintiff filed a motion for substitution of Judge, which was granted on December 8, 2005. See Exhibit 2. Accordingly, November 8, 2005 Order should be null and void, see *Nunes v. Northwest Hospital*, 253 Ill. App. 3d 337, 625 N. E. 2d 376 (1993), appeal denied 154 Ill 2d 561, 631 N. E. 2d 710, citing *In re Dominique F.*, 145 Ill. 2d 311, 324, 583 N. E. 2d 555 (1991). As a direct result of the December 8, 2005 Court Order entered by Honorable Judge Davis, defendant Buick's Answer should be nullified as well.
4. Plaintiff is entitled to have an Answer from defendant Buick before conducting discovery. Plaintiff is trying her best to get ready for the coming trial.

5. If defendant Buick's Answer was nullified, plaintiff moves for leave to start discovery after Buick files an Answer, in alternative, if Buick's Answer is still valid, plaintiff moves for leave to start discovery immediately.

WHEREFORE, plaintiff prays the Honorable Court grant this motion.

(Plaintiff's Signature)

(Date)

Yuling Zhan

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