

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

Yuling Zhan,)
Plaintiff)
V.) No: 04 M1 23226
Napleton Buick Inc; Ford Motor Company,)
Defendants)

**INSTRUCTIONS AND DEFINITION FOR PLAINTIFF'S INTERROGATORIES,
REQUESTS FOR PRODUCTION AND REQUESTS FOR ADMISSION**

Plaintiff, YULING ZHAN hereby requests that Napleton Inc., pursuant to Rule 201 of Illinois Supreme Court,

Answer the Interrogatories set forth herein, within 28 days,

Produce the documents designated below for inspection and copying, within 28 days, and

Respond to these Requests for Admissions within twenty-eight (28) days after service of these Interrogatories, Requests for Production and Requests for Admissions.

These Interrogatories, Requests for Production and Requests for Admissions are deemed to be continuing to the full extent permissible pursuant to Rule 213 of Illinois Supreme Court Rules.

INSTRUCTIONS

1. "You," "Napleton Buick Inc.," "Buick" shall refer to Defendant Napleton Buick Inc., Defendant's employees, including former employees, or agents in this action.
2. Plaintiff refers to Yuling Zhan in this action.
3. The subject car or the car in disputes refers to 1999 Ford Taurus, VIN 1FAFP53S0XG106195.

4. Each answer must be as complete and straightforward as the information reasonably available to you, Napleton Buick Inc., or anyone acting on your behalf, permits. "YOU, OR ANYONE ACTING ON YOUR BEHALF" includes you, your agents, your employees, your insurance companies, their agents, their employees, your attorneys, your accountants, your consultants and expert witnesses, your investigators, and anyone else acting on your behalf.
5. If an Interrogatory cannot be answered completely, answer it to the extent possible. If you do not have enough personal knowledge to fully answer an Interrogatory, say so, but make a reasonable and good faith effort to get the information by asking other persons, company or organizations. Fully disclose any third party sources of information and assistance, in response to Interrogatory #1, herein below.
6. Whenever an Interrogatory may be answered by referring to a document (such as business records), the document(s) may be attached as an exhibit to the response and referred to in the response. If the document has more than one page, refer to the page and section where the answer to the Interrogatory can be found.
7. In the event that Napleton Buick Inc. objects to answering any of the Interrogatories, producing any of the documents requested or responding to any of the requests for Admissions, Defendant should state the precise ground(s) for each objection and the basis for asserting that such ground is applicable. Such statement should be made separately for each Interrogatory, Request for Production and Request for Admission with respect to which Defendant asserts an objection. Communications which, on the ground of some objection, are not produced, should be identified as follows:
 - A. State the full name and the present residential address of the person or persons by whom the document was written or communications were made;
 - B. State, with respect to each of the persons identified pursuant to (A) above:
 - (1) at present, his employer, title, substantive responsibilities, business

address, immediate supervisor and the designation of the office or department in which the person is employed, and (2) at the time the document was written or communication was made, his employer, title, substantive responsibilities, immediate supervisor and the designation of the office or department in which the person was employed;

- C. State the date of the document or the date and place of the communication; State, with respect to a document, the title or caption of the document and its nature (e.g., letter / memorandum /corporate resolution / etc.);
 - D. State, with respect to a document, the present location of the document, and the name and address of the person in whose custody or control the document is currently held;
 - E. Provide a brief description of the substance or subject matter of the document or communication (without waiving an alleged privilege);
 - F. State the full name and the resent residential and business address of each person to receive the document or a copy thereof or to whom a communication was made or further disseminated; and
 - G. State, with respect to each person identified pursuant to (F) above, the information requested in (B) (1) and (2) above.
8. If any information or document responsive to any of the following Interrogatories, Requests for Production, or Request for Admissions is withheld under a claim of privilege, describe or identify:
- A. The subject matter of any information or communication withheld, and
 - B. The format (medium) and date of such communication, and
 - C. All Parties to such communication, or others who may have records of same, and
 - D. The precise nature of any privilege under which it is withheld, and the Party asserting the privilege, and the Party /Attorney /custodian /other person bound by the privilege.

9. If Defendant exercises the option to produce business records in lieu of responding to any Interrogatory, the following procedure is to be employed:
 - A. In response to such Interrogatory, please identify and attach the records containing the information;
 - B. In producing such record(s), Defendant shall produce such record(s) separately and designate the Interrogatory to which such record(s) corresponds.
10. Plaintiff requests that the documents specified below in their Request for Production of Documents be produced at Yuling Zhan, 3121 S. Low, Chicago, IL 60616, within twenty-eight (28) days from service of these Interrogatories, Request for Production of Documents, and Request for Admissions, and on successive dates thereafter until Plaintiff's inspection and copying has been completed. If any or all documents identified herein are no longer in Defendant's possession, custody, or control because of destruction, loss, or any other reason, then do the following with respect to each and every such document;
 - A. Describe the nature of the document (e.g., letter or memorandum);
 - B. State the date of the document;
 - C. Identify the person who sent and received the original and any copies of the documents;
 - D. State in as much detail as possible, the contents of the document; and
 - E. State the manner and disposition of the document identifying, if possible, the current location of the document and the person or persons in whose custody or control the document may be found.
11. For each REQUEST FOR ADMISSION, please ADMIT or DENY such request. For each DENIAL of such REQUEST, please specify each and every basis for such DENIAL, and fully disclose and explain such facts as support such DENIAL.

DEFINITIONS

1. "Document" means any medium upon which intelligence or information can be recorded or retrieved, and includes, without limitation, regardless of origin and

location, any book, pamphlet, periodical, letter, memorandum (including any memorandum or report of a meeting or conversation), invoice, bill, order form, receipt, financial statement, accounting entry, diary, calendar, telex, telegram, cable, report, record, contract, agreement, study, handwritten note, draft, working paper, chart, paper, print, laboratory record, drawing, sketch, graph, index, list, tape, photograph, microfilm, data sheet or data processing card, or any other written, recorded, transcribed, punched, taped, filmed or graphic matter, However produced or reproduced, which is in your possession, custody or control, or which was, but is no longer, in your possession, custody or control.

2. "Person" means any individual or entity, including, but not limited to, partnership(s), association(s), corporation(s), principal, agent, government institution, or other.
3. "Describe" means to set forth specifically and in detail all facts known about the matter of which the Interrogatory requires.
4. "Identify" when used with reference to a natural person, means to state each of the following:
 - A. The person's full name; the person's present residential address; and
 - B. His present employer, title, substantive responsibilities, business address, his immediate supervisor, and the designation of the office or department in which the person is employed.
5. "Identify" when used with reference to an entity other than a natural person, means to state each of the following:
 - A. The full name of the entity and any names under which it does business;
 - B. The present or last known address of the entity's principal office or place of business;
 - C. The type of entity (e.g., corporation, partnership);
 - D. All officers / agents / employees (if less than ten) of such entity,
 - E. All phone numbers for the entity and all fax numbers for the entity.

6. "Identity" when used in reference to an oral communication, including meetings, conferences, discussions, conversations, advice, counsel, speeches, addresses, and remarks, means to state each of the following:
 - A. The full name and residential and business address of the person making such oral communication;
 - B. The full name and residential and business address of each person to whom such oral communication was made;
 - C. If the oral communication was made to the members of a large class, in which case it shall be sufficient to describe the class;
 - D. The date and place at which such oral communication was made;
 - E. The substance of the oral communication; and
 - F. The source of information about the communication;
 - G. In addition, identify each document that was recorded, summarized or referred to in the oral communication.
7. "Identify" when used in reference to a document, means to state each of the following:
 - A. The nature of the document (e.g., letter of memorandum); its title or caption and its date;
 - B. The name, title, and employer of each author of the document at the time the document was written;
 - C. At the time the document was written, the name, title, and employer of each person to receive the document, or to whom a copy thereof was distributed;
 - D. The present location of the document; and the name and address of the person in whose custody or control the document is currently held.

(Plaintiff's Signature)

(Date)

Yuing Zhan

3121 S. Lowe Ave. Chicago, IL 60616 Tel: (312) 225-4401