

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. After eleven months of court proceedings, Buick and its counsel have not filed an Answer yet.
3. Plaintiff is entitled to have an Answer from defendant Buick before conducting discovery.
4. Plaintiff is trying her best to get ready for the coming trial, for which a date has already been set as March 3, 2006. Hence plaintiff respectfully submits this instant motion for leave to start discovery.

WHEREFORE, plaintiff prays the Honorable Court grant this motion.

\_\_\_\_\_  
(Plaintiff's Signature)

\_\_\_\_\_  
( Date )

Yuling Zhan

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