

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 INITIAL DISCLOSURE

Plaintiff Yuling Zhan respectfully tenders, pursuant to Rule 201 of Illinois Supreme Court, the following disclosures.

1. List of Witnesses:

Yuling Zhan
3121 S Lowe Avenue
Chicago, IL 60616
Tel: (312) 225-4401

Qiji Liu
3121 S Lowe Avenue
Chicago, IL 60616
Tel: (312) 225-4401

Mr. Edward T O'Brien
504 N. Plum Grove Rd.
Palatine, IL 60067
Telephone (847) 202-9624

Investigation continues regarding other individuals who may have discoverable information regarding Plaintiff's claims.

2. Documents:

See all papers plaintiff filed to the Court.

See all papers defendant filed to the Court and Arbitration Panel.

Investigation continues regarding other documentation in support of Plaintiff's claims.

3. Damages:

- a. Costs in Purchase order and invoice for the car in dispute: \$7812.67
- b. Insurance premium: \$ 229.00
- c. Car rental: \$ 2747.66
- d. Prejudgment interest: it will be assessed after final judgment;
- e. Legal fees to file and sustain the lawsuit, attorney fees if Plaintiff retains a lawyer when necessary;
- f. Damage of negligent and intentional infliction of emotional distress:
- g. Further relief as the Court may deem just and proper.

Respectfully submitted,

(Plaintiff's Signature)

(Date)

Yuling Zhan

3121 S. Lowe Ave. Chicago, IL 60616

Tel: (312) 225-4401