

D. Defendant generally objects to all the statements contained in Plaintiff's First Set of Interrogatories as they, including their sub-parts, impose an unnecessary burden, expense, and undue detail upon Defendant, thus, violating Illinois Supreme Court Rule 213(b).

Defendant's Responses to Plaintiff's Interrogatories

Interrogatories No. 1: Did defendant have any factual and/or legal ground for each time it entered "denied," "lack information" in the Answer, which was not a frivolous statement? If so, identify the paragraph number and for each of all such paragraphs, provide specific facts and/or legal assertions in support of each "denied" entry, or contact other persons to get necessary information in order to answer the substance of the allegation.

Response: Objection. The interrogatory is vague, ambiguous, unduly burdensome, unintelligible and oppressive, as it seeks a vast amount of unspecific information to statements already asserted in Defendant's Answer. Furthermore, Plaintiff bears the burden of proof on her claims. Defendant has no burden to identify facts supporting its denial.

Interrogatories No. 2: Please fully identify all the owners, partners; all employees and/or former employees, their position, qualification and job responsibilities at defendant Napleton Buick, Inc. during each of the last four years.

Response: Objection. The interrogatory is unduly burdensome, overly broad, oppressive, irrelevant and vague, as it seeks a vast amount of information that has no tendency to prove the veracity of any material fact contained in the pleadings at issue. Without waiving said objection and subject to same, in September 4, 2003, the following individuals were employed by Napleton Buick, Inc. (n/k/a D'Andrea Buick, Inc.): Nicholas J. D'Andrea (President) and Hector W. Hortillo (Salesman).

Interrogatories No. 3: Pursuant to Illinois Supreme Court Rule 213(f) provide the name and address of each witness who will testify at trial and all other information required for each witness.

Response: The following witnesses will testify at trial in this case: