

(a) Nicholas D'Andrea, Napleton Buick n/k/a D'Andrea Buick, 7051 S. Western Ave., Chicago, IL, will testify generally concerning all of the allegations contained in the Complaint and Defendant's Answer and Counterclaim, including but not necessarily limited to the events concerning the subject car as alleged in the Complaint, Answer and Counterclaim.

(b) Bob Caridi, Napleton Buick n/k/a D'Andrea Buick, 7051 S. Western Ave., Chicago, IL, will testify concerning Plaintiff's allegations regarding the subject automobile as set forth in her Complaint, as well as the circumstances surrounding Plaintiff's abandonment of the subject car in support of Defendant's Counterclaim.

(c) Ed Earley, Napleton Buick n/k/a D'Andrea Buick, 7051 S. Western Ave., Chicago, IL, will testify concerning Plaintiff's allegations regarding the subject automobile as set forth in her Complaint, as well as the circumstances surrounding Plaintiff's abandonment of the subject car in support of Defendant's Counterclaim.

(d) Defendant expressly reserves the right to identify additional lay and/or expert opinion witnesses and to supplement these disclosures at a later as allowed under applicable Illinois Rules and by the Court.

**Interrogatories No. 4:** Did defendant have any knowledge of the history of the subject car before and on September, 4, 2003? If so, identify the previous owner of the subject car, the number of all repair and maintenance of the car; the service facility for each repair, identify and/or describe in details how Buick acquired the subject car and the terms of acquisition, the person(s) at defendant who acquired the subject car, and communications between Buick's employee(s) and the previous owner of the subject car regarding the repair records.

**Response:** The subject car was purchased from Precision Motors at 5516 West 110<sup>th</sup> Place, Oak Lawn, IL 60453. The phone number to Precision Motors is (708) 423-2703. Precision Motors services all cars before bringing them to Defendant. Defendant then conducts a thorough check on all vehicles.