

Interrogatories No. 5: How did each of your employees communicate with plaintiff during her purchase of the subject car on September 4, 2003? Identify all persons who were present on the scene including but not limited to all your employees including former employees, and identify all communications between any person at defendant and plaintiff during the purchase. To answer this interrogatory, please identify the person who took part in the test drive with plaintiff, the communication during the test drive and the route of the test drive, the person(s) who handed over purchase papers to plaintiff and all the communications, then and there.

Response: Objection. The interrogatory is unduly burdensome, oppressive, overly broad, compound in form, vague and seeks an improper narrative response.

Interrogatories No. 6: Was there an official copy of a Buyer's Guide on each of used cars defendant sold or intended to sell in 2003? If so, identify the number, content, location of the Buyer's Guides before and after each sale, the author(s) of the Buyer's Guides and when they were prepared, the person(s) requested that they be prepared, the person(s) at defendant who handled the official copies of the Buyer's Guides before, during and after each purchase in 2003.

Response: Objection. The interrogatory is unduly burdensome, overly broad, compound in form, vague and seeks irrelevant information regarding vehicles other than the vehicle purchased by Plaintiff.

Interrogatories No. 7: Was the subject car sold to plaintiff with any warranty of consistent and specific terms? If so, identify the person(s) who showed and explained the Buyer's Guide to plaintiff and all persons who were on the scene; describe when, where and how the person(s) did these before and during plaintiff made the purchase decision. Identify the person who received phone call from plaintiff in the afternoon of September 4, 2003, regarding the warranty paper, all communication between that person and plaintiff; all other persons who were present at defendant and had knowledge of above-mentioned communication, describe in detail what that person did afterwards; and identify all communications Buick made to any person(s) including plaintiff from September 10, 2003 to December 22, 2004, which explicitly indicated the subject car was under any kind of warranty.

Response: Objection. The interrogatory is unduly burdensome, oppressive, overly broad, compound in form, vague and seeks an improper narrative response.

Interrogatories No. 8: Did Buick perform inspection and/or mechanical check-up before and during plaintiff's purchase? If so, identify all person(s) who performed the inspection and/or mechanical check of the car in dispute; describe qualification for each of them (training, education, license or certification background etc.); describe what each of them did in details during the inspection test and mechanical check-up; identify and produce all documents and record(s) of the inspection and mechanical check-up.