

Response: Objection. The interrogatory is unduly burdensome, overly broad, oppressive, compound in form, and vague as it seeks a vast amount of non-specific information.

Interrogatories No. 9: After the car in dispute stalled at highway speed on September 8, 2003, plaintiff and/or some other person call Buick to tow back the car. Identify the person(s) who received the calls before and after towing back the subject car, the communications between that person(s) at defendant and plaintiff or any other person, each of all persons at defendant who was notified and all communications before and after towing back the subject car on September 8, 2003.

Response: Objection. The interrogatory assumes facts not in evidence, and is unduly burdensome, overly broad, oppressive, compound in form, vague, and seeks an improper narrative response.

Interrogatories No. 10: Did plaintiff misuse the car? If so, identify and list all the ways in which plaintiff misused the car to cause engine stalling at highway speed, provide all documentation related to this issue defendant created from September 8, 2003 to December 22, 2004, from December 22, 2004 to April 1, 2005 and from April 1, 2005 to the present day, respectively.

Response: Unknown at present time. Investigation continues.

Interrogatories No. 11: Is the subject car defect-free and operable without any cost in repair at this moment? If not, identify each of all defective parts of the subject car which impair the car's operation and safety, identify each of all persons, laboratories, facilities, etc. performed the testing on each of all defective parts, identify and produce all documents of testing, the estimate of itemized costs to replace or repair each of all the defective parts.

Response: The subject vehicle was not operable in April 2005. Any defects are unknown at the present time.

Interrogatories No. 12: On September 9, 2003, plaintiff sent Buick a fax and a letter, asking Buick's response by fax in three days. Did Buick fax, call plaintiff, or send certified mail to plaintiff afterwards? If so, identify all faxes or phone calls Buick made trying to reach plaintiff ever since, including the date, time and the person(s) who made the attempts on each of all occasions, identify and produce all documents, including but not limited to records from telephone company; all certificate letter receipts and other mailing proof for the time period of September 8, 2003 to December 22, 2004.