

**Response:** Objection. The interrogatory is unduly burdensome, overly broad, oppressive, compound in form and seeks irrelevant information that has no tendency to prove the veracity of any material fact at issue.

**Interrogatories No. 13:** Did any person(s) working for defendant access, or inspect, or repair the subject car and/or alter its condition in any way from September 8, 2003 to the present day? If so, please identify the person(s) who was responsible for the control of day-to-day access to the subject car, the person(s) who accessed, inspected, or repaired the subject car and/or altered its condition, and all persons on the scene on such occasion(s) before and after April 1, 2005. To answer this interrogatory, please identify and describe step-by-step procedure, each of all vehicle part(s) accessed, or inspected, or repaired and/or altered; identify and produce all the related records and documents.

**Response:** Objection. The interrogatory is unduly burdensome, overly broad, oppressive, compound in form, irrelevant and vague as it seeks a vast amount of non-specific information that have no tendency to prove the veracity of any material fact at issue.

**Interrogatories No. 14:** Who initiated and/or participated in the process of filing a counterclaim against plaintiff in the instant lawsuit, but deciding not to present it to the Arbitration Panel? Identify all persons involved and provide all documents and communication records from all the identified persons.

**Response:** Objection. The interrogatory seeks attorney-client protected communications and the attorney work product, and otherwise seeks irrelevant information that has no tendency to prove the veracity of any material fact at issue.

**Interrogatories No. 15:** What is your estimate of the market value for the subject car before and after plaintiff's purchase? Please provide the market value of the subject car if maintenance record was disclosed on September 4, 2003, the market value of the car after it stalled at highway speed at 60 miles/hr if such information would be fully disclosed to a potential buyer, the market value when safety recall information is fully disclosed to the public, the market value of the subject car at the present day. For each instance, please list dealer's purchasing prices and selling prices for the market value and identify any documents and/or any basis for your estimate

**Response:** Objection. The interrogatory assumes facts not in evidence and is vague. Without waiving said objection and subject to the same, Defendant states that the market value of the