

vehicle purchased by Plaintiff on the date she purchased was the purchase price she agreed to pay.

Interrogatories No 16: Identify all documents, all oral presentations and/or communications Buick presented to the Arbitration Panel, and Buick considered any of them had any merit for an arbitration award on August 3, 2005.

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

Interrogatories No. 17: Did defendant have any communication with any person(s) other than plaintiff regarding the subject car out of Court from September 10, 2003 to the present day? If so, identify and produce all documents and/or records of communication (whether oral, electronic or other means), including but without limitation all letters, diaries, calendars, desk pads and computer back-up files, which should indicate the date and time, place and circumstances of the communication, participants of the communication and/or author(s) of documents. Here, "person(s)" should include natural persons, governmental agencies, companies etc. as defined in Exhibit A.

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. 18: State the name, address, telephone number, and relationship to defendant of each person who prepared or assisted in the preparation of the response to these interrogatories (Do not identify anyone who simply typed or reproduced the responses).

Response: Nicholas J. D'Andrea, President, prepared answers with assistance from counsel.

Interrogatories No. 19: Has defendant or any of its employees ever been a party or a witness and testified in a court in the past four years? If so, describe all litigations to which the defendant and/or anyone at defendant has been a party or a witness and testified. Such description should include the case name, court where filed (identify the court by level, location, and state), the case or action number, identification of all plaintiffs and defendants, identification of respective counsel, a description of the nature of that litigation and the issues involved therein, and current statutes or final result/outcome of such litigation.