

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
MUNICIPAL DEPARTMENT, FIRST DISTRICT

Yuling Zhan, )  
Plaintiff )  
V. ) No: 04 M1 23226  
Napleton Buick Inc, )  
Defendant )

**ANSWER TO DEFENDANT’S INTERROGATORIES**

NOW COMES the plaintiff, YULING ZHAN, for her Answer to Defendant’s Interrogatories, states as follows:

**GENERAL OBJECTIONS**

- A. Plaintiff generally objects to the routine practice from defendant and its counsel when they fail to provide any printed name of any attorney in their papers. No attorney shall hide his/her identity.
- B. Plaintiff generally objects to the occurrences, now and then, here and there, defendant and its counsel provide deliberate false statement in or out of Court: Regarding the instant Interrogatories, defendant’s counsel Ms. Elaine S. Vorberg wrote plaintiff a letter on April 19, 2006, and claimed that a file-stamped Certificate of Service was enclosed in her letter. It is a fraudulent statement, pure and simple.
- C. Plaintiff generally objects to all the statements contained in defendant’s Interrogatories to the extent they seek irrelevant information.

**PLAINTIFF’S RESPONSE TO DEFENDANT’S INTERROGATORIES**

**Interrogatories No. 1** *Pursuant to Supreme Court Rule 213(t)(l), state the full address, telephone number, job title, occupation and place of employment of all lay witnesses who are expected to testify on behalf of Plaintiff, along with the subject matter of that testify.*

**Response:** Objection. Plaintiff objects this interrogatory to the extent it seeks irrelevant information. Further answering, without waiving said objection and subject to same, the following individuals will testify for plaintiff as lay witnesses at trial:

- (1) Yuling Zhan, 3121 S Lowe Avenue, Chicago, IL 60616, Tel: (312) 225-4401, will testify generally concerning all legal and factual allegations in her Complaint and in all of her other Court filings. She will testify generally concerning all of the issues, including but not necessarily limited to, which are related to defendant's Court filings, presentation in Court and during arbitration, and correspondences with defendant and its counsel in and out of the Court. Further answering, Monday, September 8 of 2003 is the first day plaintiff started her work at Sara Lee Corporation at Bensenville.
- (2) Qiji Liu, 3121 S Lowe Avenue, Chicago, IL 60616, Tel: (312) 225-4401, (312) 225-4109, will testify generally concerning all legal and factual allegations in plaintiff's Complaint and in all of other Court filings. Mr. Liu will testify generally concerning all of the issues, including but not necessarily limited to, which are related to defendant's Court filings, and written correspondences between plaintiff and defendant, including its counsel. Mr. Liu will testify under what circumstance plaintiff was persuaded by several of defendant's employees to buy a used car, and what happened afterwards; Mr. Liu will testify that the subject car was defective and after it stalled on the highway it was inoperable; and he will testify what the car condition before and during defendant's "forensic investigation" and what defendant did during the "inspection". Further answering, Mr. Liu was running a business in 2003.
- (3) Mr. Edward T O'Brien, 504 N. Plum Grove Rd. Palatine, IL 60067 Telephone (847) 202-9624, will testify generally concerning that, including but not necessarily limited to, the condition of the subject car when it stall on the highway, and he will testify that the subject car was defective and it

was inoperable after it stalled. Further answering, Mr. Edward T O'Brien is an experienced truck, compact car and limousine driver.

(4) Plaintiff expressly reserves the right to identify additional lay witness to supplement these disclosures at a later time as allowed under applicable Illinois Rules and by Court.

**Interrogatories No. 2** *Pursuant to Supreme Court Rule 213(f)(2), state the full name, address, telephone number, job title, occupation and place of employment of all independent expert witnesses who are expected to testify along with the subject matter of that testimony, their qualification, and the opinion that the Plaintiff expects to elicit from each one.*

**Response:** Objection. Plaintiff objects this interrogatory to the extent it seeks irrelevant information for the instant lawsuit. Without waiving said objection and subject to the same, Plaintiff expressly reserves the right to identify expert witnesses to supplement these disclosures at a later time as allowed under applicable Illinois Rules and by Court.

**Interrogatories No. 3** *Pursuant to Supreme Court Rule 213(f)(3), state the full name, address, telephone number, occupation and place of employment of all controlled expert witnesses who may be called upon to testify at trial, and for each one, state: a. The subject matter on which the witness will testimony, b. The qualification of the witness c. The qualification of the witness; and d. Any reports prepared by the witness about the case.*

**Response:** Objection. Plaintiff objects this interrogatory to the extent it seeks irrelevant information for the instant lawsuit. Without waiving said objection and subject to the same, Plaintiff expressly reserves the right to identify controlled expert witnesses to supplement these disclosures at a later time as allowed under applicable Illinois Rules and by Court.

Respectfully submitted,

\_\_\_\_\_  
(Plaintiff's Signature)

\_\_\_\_\_  
( Date )

Yuling Zhan

3121 S. Lowe Ave, Chicago, IL 60616, Tel: (312) 225-4401

**VERIFICATION**

I, YULING ZHAN, under penalties by law pursuant to Section 1-109 of the Code of Civil Procedure, certified that the forgoing answers to the interrogatories are true and correct to the best of my knowledge, information and believe.

Date: May \_\_\_\_\_, 2006

\_\_\_\_\_  
Yuling Zhan

**CERTIFICATE OF SERVICE**

TO: Elaine S Vorberg, Childress Duffy Goldblatt, Ltd. 515 North State Street  
Suite 2200, Chicago, IL 60610

I, Yuling Zhan, plaintiff, certify that I cause an exact copy of the attached Answer to Defendant's Interrogatories, by mailing such a copy to the above-named Defendant's attorney at the above address: by depositing such a copy thereof with envelope bearing sufficient pre-paid postage in the United States Mail on the \_\_\_\_ day of May, A. D. 2006 at or before 4:00 pm.

\_\_\_\_\_  
(Plaintiff's Signature)

\_\_\_\_\_  
( Date )

Yuling Zhan,

3121 S. Lowe Ave

Chicago, IL 60616, Tel: (312) 225-4401