

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

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

PLAINTIFF'S FIRST SET OF REQUEST FOR PRODUCTION OF DOCUMENTS

Pursuant to Illinois Supreme Rule 201, plaintiff, YULING ZHAN, requests defendant Napleton Buick Inc. ("Buick") for copying and inspection, the following documents within 28 days of service. The documents should be produced at YULING ZHAN, 3121 South Lowe, Chicago, Illinois 60616, In responding to this Request for Production of Documents, please consult and adhere to the definition and instructions attached as Exhibit A, please pay special attention to the definition of the terms, such as "identify", "document(s)" and "person(s)".

1. Produce all documents used by defendant Buick to answer plaintiff's First Set of Interrogatories
2. Produce all documents created by Buick between September 4, 2003 and December 22, 2004, upon which Buick relies or intends to rely at trial in support of its defense.
3. Produce all documents which show how many and what model of new and used cars Defendant sold in 2003, each of their retail prices and profits.
4. Produce all documents, which show repair records and invoices for each of all cars Buick sold but broke down during warranty period, for each of the last five years.
5. Produce all documents, which reflect defendant's assets, liabilities and net worth as of the time of answering these interrogatories.

6. Produce all monthly and/or quarterly bank statements from all financial institutions in which defendant had an account for the year of 2003.
7. Produce all documents and records from local telephone company for each occasion Buick asserts it called plaintiff or sent a fax to plaintiff from September 10, 2003 to December 22, 2004.
8. Produce all documents and records of communication (whether oral, electronic or other means) between Buick and plaintiff created by Buick from September 4, 2003 to December 22, 2004, including but without limitation all letters, advertisement materials, diaries, calendars, desk pads, and computer back-up files.
9. Produce all documents or records of communication (whether oral, electronic or other means) between Mr. Nicholas J. D'Andrea and other person(s) regarding the sale of the subject car on September 4, September 8, September 9, September 10 of 2003 and thereafter. The documents should include but is not limited to the locations at which the communications took place, and the means of communication (oral, telephone conversation etc.) and date, time and content of each communication
10. Produce all documents and records of communication (whether oral, electronic or other means) between Mr. Ed Earley and other person(s), created by Mr. Ed Earley in the capacity of his employment at defendant from September 4 to December 31, 2003. The records should include but is not limited to the locations at which the communications took place, the means of communication (oral, telephone conversation etc.), computer back-up files, and date, time and content of each of all communications.
11. Produce all record of communication (whether oral, electronic or other means) between Mr. Bob Caridi and other person(s) regarding the sale of the subject car on September 4, September 8, September 9 and September 10 of 2003 and thereafter. The records should include but is not limited to the location at which the communications took place, and the means of communication (oral, telephone conversation etc.) and date, time and content of each communication.

12. Produce true and exact copies of the original "Buyer's Guides" for each of all used cars defendant sold or intended to sell in 2003, please include the information regarding the dates the documents were created and the author(s) of the documents.
13. Produce all documents related to the transaction between Buick and previous owner of the car in dispute.
14. Produce all maintenance records, recall, transaction, and insurance records in defendant possession for the car in dispute.
15. Produce all documents for inspection of the subject car on and before September 4, 2003.
16. Produce all documents for mechanical check-up at plaintiff's request during the sale on September 4, 2003.
17. Produce all records and documents created by Buick from September 8, 2003 to the present day whenever Buick accessed the car, including but not limited to all access authorization, reports, notes, data sheets, desk pads and computer back-up files.
18. Produce all documents related to the initiation and authorization of filing a counterclaim against plaintiff in the instant lawsuit.
19. Produce all documents related to the initiation of demanding car keys of the subject car after the instant lawsuit was filed.
20. Produce a set of copies of written motion, notice of motion, certificate of service for Buick's request of car keys in the Court.
21. Produce a set of copies of written motion, notice of motion, certificate of service for Buick's request to withdraw jury demand in the Court.
22. Produce all documents and notice Buick served upon plaintiff, which showed Buick's intention to present the documents to the Arbitration Panel pursuant to Illinois Supreme Court Rule 90 (c).
23. Produce all documents Buick presented to the Arbitration Panel on August 3, 2005.

24. Produce all documents related to the decision not to present the counterclaim to the Arbitration Panel.
25. Produce all documents related to defendant's decision to demand a jury trial.
26. Produce all invoices, retainer agreements, and other documents pertaining to your legal representation in the instant case showing amounts paid, by whom the amounts paid, amounts billed, and the fee agreement.
27. Produce all documents and records of communication regarding the instant lawsuit, (whether oral, electronic or other means) between Buick and all persons other than plaintiff from September 10, 2003 to the present day including but without limitation all letters, diaries, calendars, desk pads, computer back-up files, their author(s) and creation dates.
28. Produce all documents or case logs, which show name(s) of defendant's counsel who attended each of all hearings in the Court, including but not limited to the specific hearing dates, counsel's name(s) and their certificate(s).
29. Produce all documents produced by defendant in any other litigation, where defendant's business practice and credibility are or were at issue.
30. Produce all pleadings, motions, filings, judgments, awards and court orders in any other litigation, where defendant's business practice and credibility are or were at issue.
31. Produce all documents produced by Mr. Nicholas J. D'Andrea, Mr. Ed Earley and Mr. Bob Caridi in any other litigation, where credibility for anyone of them is or was at issue.

Respectfully submitted,

(Plaintiff's Signature)

(Date)

Yuling Zhan, 3121 S. Lowe Ave

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