

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

YULING ZHAN,)	
)	
Plaintiff,)	
)	
v.)	No. 04 M1 23226
)	
NAPLETON BUICK, INC., and)	
FORD MOTOR COMPANY,)	
)	
Defendants.)	

**DEFENDANT'S RESPONSE TO PLAINTIFF'S FIRST SET OF
REQUESTS FOR PRODUCTION OF DOCUMENTS**

NOW COMES the Defendant, D'ANDREA BUICK, INC., (erroneously sued as NAPLETON BUICK, INC.) (hereafter "Defendant"), by and through its attorneys, the law firm of CHILDRESS DUFFY GOLDBLATT, LTD., and for its Response to Plaintiff's First Set of Requests for the Production of Documents, states as follows:

GENERAL OBJECTIONS

A. Defendant generally objects to all the statements contained in Plaintiff's First Set of Requests for the Production of Documents to the extent they call for information protected from disclosure by the attorney-client privilege, work product doctrine or any other applicable privilege.

B. Defendant generally objects to the Requests' Instructions and Definitions to the extent they purport to impose obligations beyond those permissible under Illinois Supreme Court Rule 201, Illinois Supreme Court Rule 214 and other applicable rules.

C. Defendant generally objects to all the statements contained in Plaintiff's First Set of Requests for the Production of Documents as they, including their sub-parts, impose an