

unnecessary burden, expense, and undue detail upon Defendant, thus, violating Illinois Sup. Ct. Rule 201(b).

1. Produce all documents used by defendant Buick to answer plaintiff's First Set of Interrogatories

RESPONSE: See attached documents.

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.

RESPONSE: Defendant has attached documents which it may use at trial in this case and expressly reserves the right to use additional documents at trial in this case and to identify and supplement these disclosures.

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.

RESPONSE: Objection. Defendant objects to this Request as it is overbroad as to content, unduly burdensome, and requests information that is irrelevant and not calculated to lead to the discovery of relevant and admissible evidence.

4. Produce all documents, which show repair records and invoices for each of all cars Buick sold but brake down during warranty period, for each of the last five years

RESPONSE: Objection. Defendant objects to this Request as it is vague, overly broad as to content, unduly burdensome and seeks information irrelevant and not calculated to lead to the discovery of relevant and admissible evidence.

5. Produce all documents, which reflect defendant's assets, liabilities and net worth as of the time of answering these interrogatories.