

RESPONSE: Objection. Defendant objects to this Request as it is vague, overly broad as to content, and seeks information irrelevant and not calculated to lead to the discovery of relevant and admissible evidence. Defendant further objects as the requested information is irrelevant in determining any issues in this case, including but not limited to whether the defendant is liable to the plaintiff on any of the claims at issue.

6. Produce all monthly and/or quarterly bank statements from all financial institutions in which defendant had an account for the year of 2003.

RESPONSE: Objection. Defendant objects to this Request as it is vague, overly broad as to content, and seeks information irrelevant and not calculated to lead to the discovery of relevant and admissible evidence Defendant further objects as the requested information is irrelevant in determining any issues in this case, including but not limited to whether the defendant is liable to the plaintiff on any of the claims at issue.

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.

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

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