

RESPONSE: Objection. Defendant objects to this Request as it requests information that it is overly broad, unduly burdensome and irrelevant in determining whether the defendant is liable to the plaintiff on any of the claims at issue. Without waiving and subject to said objection, Defendant has produced the letter it sent to Plaintiff dated September 10, 2003.

9. Produce all documents or records of communication (whether oral, electronic or other means) between Mr. Nicholas J, DAndrea 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

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

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.

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