

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.

**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. Without waving and subject to said objection, Defendant does not have in its possession any such documents.

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.

**RESPONSE:** Objection. Defendant objects to this Request in that it is overbroad as to time, unduly burdensome and requests information that is irrelevant in determining whether the defendant is liable to the plaintiff on any of the claims at issue.

13. Produce all documents related to the transaction between Buick and previous owner of the car in dispute.

**RESPONSE:** Objection. Defendant objects to this Request in that it is overbroad as to time, unduly burdensome and requests information that is irrelevant in determining whether the defendant is liable to the plaintiff on any of the claims at issue.