

14. Produce all maintenance records, recall, transaction, and insurance records in defendant possession for the car in dispute.

**RESPONSE:** Defendant does not have in its possession any such documents.

15. Produce all documents for inspection of the subject car on and before September 4, 2003.

**RESPONSE:** Defendant does not have in its possession any such documents.

16. Produce all documents for mechanical check-up at plaintiff's request during the sale on September 4, 2003.

**RESPONSE:** Defendant does not have in its possession any such documents.

17. Produce all records and documents created by Buick from September 8, 2003 to the present day whenever Buick accessed the car, including but not limited to all access authorization, reports, notes, data sheets, desk pads and computer back up files.

**RESPONSE:** Defendant does not have in its possession any such documents.

18. Produce all documents related to the initiation and authorization of filing a counterclaim against plaintiff in the instant lawsuit.

**RESPONSE:** Objection. Defendant objects to this Request, as it seeks attorney-client protected communication and attorney work-product and otherwise seeks information that is irrelevant and will not lead to the discovery of relevant and admissible evidence.

19. Produce all documents related to the initiation of demanding car keys of the subject car after the instant lawsuit was filed.