

RESPONSE: Objection. Defendant objects to this Request, as it seeks information that is irrelevant and will not lead to the discovery of relevant and admissible evidence and because Plaintiff rejected the Arbitration Award.

24. Produce all documents related to the decision not to present the counterclaim to the Arbitration Panel.

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.

25. Produce all documents related to defendant's decision to demand a jury trial.

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.

26. Produce all invoices, retainer agreements, and other documents pertaining to your legal representation in the instant case showing amounts paid, by whom the amounts paid, amounts billed, and the fee agreement.

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.

27. Produce all documents and records of communication regarding the instant lawsuit, (whether oral, electronic or other means) between Buick and all persons other than plaintiff from September 10, 2003 to the present day including but without limitation all