

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF OAKLAND

ALEX ZAWEL, an individual,

Plaintiff,

v

VAST PERFORMANCE, LLC, a  
Michigan limited liability company,

Defendant.

OAKLAND  
COUNTY

11-122057-CZ



JUDGE RUDY J. NICHOLS

ZAWEL, ALEX v VAST PERFORMANCE

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**PLAINTIFF'S FIRST SET OF REQUESTS FOR ADMISSIONS,  
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS  
DIRECTED TO DEFENDANT**

NOW COMES Plaintiff, Alex Zawel, by and through his attorneys, THE STROBLE LAW FIRM, P.C., and states as follows:

**Introduction, Definitions, and Instructions**

Each interrogatory seeks information which is available to you. As used in these interrogatories, the following terms are to be interpreted in accordance with the following definitions:

(a) The term "person" includes any individual, firm, partnership, joint stock company, unincorporated association or society, municipal or other corporation, the State, State agencies or political subdivisions, any court, and any other organization or entity.

(b) The terms "Defendant," "you," and "your" refers to the "person" to whom these interrogatories are directed and, without limitations, to your agents, employees, attorneys, investigators, insurance carriers, or any other persons who had made this knowledge known to you, or from whom you can get this information, and who is competent to testify as to the facts stated.

(c) The terms "document" or "documents" include all original "writings, receipts, drawings, graphs, charts, photographs, slides, recordings (by any medium), transcripts, reports, statements, studies, telephone records, sketches" and other data compilations from which information can be obtained, translated, if necessary, by "you" through detection devices and into reasonably usable form, whether it is now or has at any time been in your possession, custody or control.

(d) The terms "thing" or "things" include any and all physical objects having finite dimensions and mass, not otherwise included in the definition of "document" or "documents" above, including but not limited to: clothing, containers, devices, goods, liquids, materials, machines, models, packages, packaging materials, parts, samples, tools, and vehicles.

(e) When the terms "identify," "identity," or "identification," are used in conjunction with the term "person," or if the answer to any interrogatory in this document refers to a person (as defined in this document), you must state each person's (1) full name; (2) present or last known address, (3) home and business telephone numbers; and (3) present occupation, job title, business affiliation and/or nature of business. When used in reference to a person other than a natural person, the terms "identify," "identity," or "identification," require you to describe the nature of such person (i.e., whether it is a corporation, partnership, etc. under the definition of "person," above), and to state that person's last known address, telephone number, and principal place of business. Once any

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person has been identified properly, it shall be sufficient thereafter, when identifying that same person, to state the name only.

(f) The terms “identify,” “identity,” or “identification,” when used in conjunction with the term “document,” or if the answer to the interrogatory refers to a document (as defined in this document), you must set forth, with respect to each document (1) the date of the document; (2) the author and, if different, the signor or signors, the addressee, and the type of document (e.g., letter, memorandum, telegram, chart, etc.); (3) the nature and substance of the document, describing it specifically so that it can be identified in a request to produce. If any such document was, but is no longer in your possession or subject to your control, state what disposition was made of it, and the reason for such disposition. In lieu of so identifying a document, you may produce the document, provided that it is appropriately labeled to correspond to the interrogatory to which it is responsive.

(g) As used in this document, “date” shall mean the exact day, month, and year, if ascertainable, or, if not ascertainable, the best approximation (including reference and relationship to other events).

(h) Wordings inserted in [brackets] at the beginning of the questions are intended as a rough guide to the general area of inquiry of that specific question. Such wordings are not intended to limit the response which you give. Please respond fully to the language of the question, rather than refer simply to such wordings when drafting your response.

Concerning your answer:

(i) If any document, or identification or description of any document or oral communication, is withheld under a claim of privilege, then provide sufficient information to determine the identity of the document or oral communication, and state the basis for

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any asserted claim of privilege, so that the court and the parties may determine the validity of the claim of privilege.

(ii) If you object to part of an interrogatory and refuse to answer that part, state your objection, and answer the remaining portion of that interrogatory. If you object to the scope or time period, state your objection and answer the interrogatory for the scope or time period you believe is appropriate.

(iii) If any of the following interrogatories cannot be answered in full, after exercising due diligence to secure the information, please state this, and answer to the extent possible, specifying your inability to answer the remainder, and stating whatever information you have concerning the unanswered portions. If your answer is qualified in any particular, set forth the details of the qualifications.

These interrogatories are continuing in nature and, pursuant to MCR 2.302(E)(1)(c), you are obligated to supplement answers to them as additional or further information becomes available to you, either directly or indirectly, up to the time of trial.

These interrogatories include Requests to Produce Documents. Pursuant to MCR 2.310, you are requested to produce the following documents and things, for inspection and copying, at The Stroble Law Firm, P.C., 2525 Telegraph Road, Suite 100, Bloomfield Hills, Michigan 48302, within 28 days.

These items may be produced by mailing or by hand-delivering them within the time permitted by court rule to: 2525 Telegraph Road, Suite 100, Bloomfield Hills, Michigan 48302.

Documents produced for inspection, sent by mail, or hand-delivered, must be produced as they are kept in the usual course of business or be organized and labeled to correspond with the categories in this request.

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These requests shall be deemed continuing in nature, and supplementation shall be required immediately upon your receipt, directly or indirectly, of additional or further information, documents, or things, from the time of original production up to the time of trial.

**REQUEST TO ADMIT NO. 1:**

Please admit or deny the following statement:

Prior to June 10, 2011, VAST Performance, LLC was not registered as a motor vehicle repair facility with the State of Michigan, pursuant to the Motor Vehicle Service and Repair Act, MCL 257.1301, et. seq.

**ANSWER:**

**INTERROGATORY NO. 1:**

If Defendant denied the above Request for Admission, please provide the following information and documentation:

- a. Please identify each and every fact upon which Defendant relies in support of its denial;
- b. Please identify and produce and any all documentation, video and photographs upon which Defendant relies in support of its denial;
- c. Please state the names, address, telephone numbers and job titles of each and every individual upon whom the Defendant relies in support of its denial;
- d. Please provide a summary of the anticipated testimony of each said person identified herein.

**ANSWER:**

**REQUEST TO ADMIT NO. 2:**

Please admit or deny the following statement:

Between April 2009 and June 10, 2011, VAST Performance, LLC employed

motor vehicle mechanics and/or technicians who repaired motor vehicles for compensation.

**ANSWER:**

**INTERROGATORY NO. 2:**

If Defendant denied the above Request for Admission, please provide the following information and documentation:

- a. Please identify each and every fact upon which Defendant relies in support of its denial;
- b. Please identify and produce and any all documentation, video and photographs upon which Defendant relies in support of its denial;
- c. Please state the names, address, telephone numbers and job titles of each and every individual upon whom the Defendant relies in support of its denial;
- d. Please provide a summary of the anticipated testimony of each said person identified herein.

**ANSWER:**

**REQUEST FOR ADMISSION NO. 3:**

Please admit or deny the following statement:

VAST Performance, LLC considers itself an "automobile enhancement facility".

**ANSWER:**

**INTERROGATORY NO. 3:**

If Defendant denied the above Request for Admission, please provide the following information and documentation:

If Defendant denied the above Request for Admission, please provide the following information and documentation:

- a. Please identify each and every fact upon which Defendant relies in support of its denial;
- b. Please identify and produce and any all documentation, video and photographs upon which Defendant relies in support of its denial;
- c. Please state the names, address, telephone numbers and job titles of each and every individual upon whom the Defendant relies in support of its denial;
- d. Please provide a summary of the anticipated testimony of each said person identified herein.

**ANSWER:**

**REQUEST FOR ADMISSION NO. 4:**

Please admit or deny the following statement:

As an automobile enhancement facility, VAST Performance, LLC's mechanics and/or technicians recondition, replace, adjust and/or alter the operating condition of motor vehicles.

**ANSWER:**

**INTERROGATORY NO. 4:**

If Defendant denied the above Request for Admission, please provide the following information and documentation:

- a. Please identify each and every fact upon which Defendant relies in support of its denial;
- b. Please identify and produce and any all documentation, video and photographs upon which Defendant relies in support of its denial;
- c. Please state the names, address, telephone numbers and job titles of each and every individual upon whom the Defendant relies in support of its denial;
- d. Please provide a summary of the anticipated testimony of each said person identified herein.

**ANSWER:**

**REQUEST TO ADMIT NO. 5:**

Please admit or deny the following statement:

Between April 2009 and June 2011, VAST Performance, LLC operated a motor vehicle repair facility.

**ANSWER:**

**INTERROGATORY NO. 5:**

If Defendant denied the above Request for Admission, please provide the following information and documentation:

- a. Please identify each and every fact upon which Defendant relies in support of its denial;
- b. Please identify and produce and any all documentation, video and photographs upon which Defendant relies in support of its denial;
- c. Please state the names, address, telephone numbers and job titles of each and every individual upon whom the Defendant relies in support of its denial;
- d. Please provide a summary of the anticipated testimony of each said person identified herein.

**ANSWER:**

**REQUEST TO ADMIT NO. 6:**

Please admit or deny the following statement:

Between April 2009 and June 11, 2011, VAST Performance, LLC and its employees performed maintenance upon motor vehicles for compensation.

**ANSWER:**

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**INTERROGATORY NO. 6:**

If Defendant denied the above Request for Admission, please provide the following information and documentation:

- a. Please identify each and every fact upon which Defendant relies in support of its denial;
- b. Please identify and produce and any all documentation, video and photographs upon which Defendant relies in support of its denial;
- c. Please state the names, address, telephone numbers and job titles of each and every individual upon whom the Defendant relies in support of its denial;
- d. Please provide a summary of the anticipated testimony of each said person identified herein.

**ANSWER:**

**REQUEST TO ADMIT NO. 7:**

Please admit or deny the following statement:

Between April 2009 and June 2011, VAST Performance, LLC and/or its employees performed diagnostic testing upon motor vehicles for compensation.

**ANSWER:**

**INTERROGATORY NO. 7:**

If Defendant denied the above Request for Admission, please provide the following information and documentation:

- a. Please identify each and every fact upon which Defendant relies in support of its denial;
- b. Please identify and produce and any all documentation, video and photographs upon which Defendant relies in support of its denial;
- c. Please state the names, address, telephone numbers and job titles of each and every individual upon whom the Defendant relies in support of its denial;

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**ANSWER:**

**INTERROGATORY NO. 9:**

If Defendant denied the above Request for Admission, please provide the following information and documentation:

- a. Please identify each and every fact upon which Defendant relies in support of its denial;
- b. Please identify and produce and any all documentation, video and photographs upon which Defendant relies in support of its denial;
- c. Please state the names, address, telephone numbers and job titles of each and every individual upon whom the Defendant relies in support of its denial;
- d. Please provide a summary of the anticipated testimony of each said person identified herein.

**ANSWER:**

**REQUEST TO ADMIT NO. 10:**

Please admit or deny the following statement:

VAST Performance, LLC is not in the business of repairing motor vehicles only for a single commercial or industrial establishment or governmental entity.

**ANSWER:**

**INTERROGATORY NO. 11:**

If Defendant denied the above Request for Admission, please provide the following information and documentation:

- a. Please identify each and every fact upon which Defendant relies in support of its denial;

- b. Please identify and produce and any all documentation, video and photographs upon which Defendant relies in support of its denial;
- c. Please state the names, address, telephone numbers and job titles of each and every individual upon whom the Defendant relies in support of its denial;
- d. Please provide a summary of the anticipated testimony of each said person identified herein.

**ANSWER:**

**REQUEST TO ADMIT NO. 12:**

Please admit or deny the following statement:

VAST Performance, LLC is not a person who engages solely in repairing his own vehicle or a family member's vehicle.

**ANSWER:**

**INTERROGATORY NO. 12:**

If Defendant denied the above Request for Admission, please provide the following information and documentation:

- a. Please identify each and every fact upon which Defendant relies in support of its denial;
- b. Please identify and produce and any all documentation, video and photographs upon which Defendant relies in support of its denial;
- c. Please state the names, address, telephone numbers and job titles of each and every individual upon whom the Defendant relies in support of its denial;
- d. Please provide a summary of the anticipated testimony of each said person identified herein.

**ANSWER:**

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**REQUEST TO ADMIT NO. 13:**

Please admit or deny the following statement:

VAST Performance, LLC is a business that does diagnose the operation and/or problems of a motor vehicle.

**ANSWER:**

**INTERROGATORY NO. 13:**

If Defendant denied the above Request for Admission, please provide the following information and documentation:

- a. Please identify each and every fact upon which Defendant relies in support of its denial;
- b. Please identify and produce and any all documentation, video and photographs upon which Defendant relies in support of its denial;
- c. Please state the names, address, telephone numbers and job titles of each and every individual upon whom the Defendant relies in support of its denial;
- d. Please provide a summary of the anticipated testimony of each said person identified herein.

**ANSWER:**

**REQUEST TO ADMIT NO. 14:**

Please admit or deny the following statement:

VAST Performance, LLC is a business that does remove parts from motor vehicles to be re-machined.

**ANSWER:**

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**INTERROGATORY NO. 14:**

If Defendant denied the above Request for Admission, please provide the following information and documentation:

- a. Please identify each and every fact upon which Defendant relies in support of its denial;
- b. Please identify and produce and any all documentation, video and photographs upon which Defendant relies in support of its denial;
- c. Please state the names, address, telephone numbers and job titles of each and every individual upon whom the Defendant relies in support of its denial;
- d. Please provide a summary of the anticipated testimony of each said person identified herein.

**ANSWER:**

**REQUEST TO ADMIT NO. 15:**

Please admit or deny the following statement:

VAST Performance, LLC is a business that does install finished machined or re-machined parts on a motor vehicle.

**ANSWER:**

**INTERROGATORY NO. 15:**

If Defendant denied the above Request for Admission, please provide the following information and documentation:

- a. Please identify each and every fact upon which Defendant relies in support of its denial;
- b. Please identify and produce and any all documentation, video and photographs upon which Defendant relies in support of its denial;
- c. Please state the names, address, telephone numbers and job titles of each and every individual upon whom the Defendant relies in support of its denial;

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- d. Please provide a summary of the anticipated testimony of each said person identified herein.

**ANSWER:**

**REQUEST TO ADMIT NO. 16:**

Please admit or deny the following:

VAST Performance, LLC is not in the full time employ of an automobile manufacturer and is not engaged solely in that capacity to work on motor vehicles owned or being produced by that manufacturer.

**ANSWER:**

**INTERROGATORY NO. 16:**

If Defendant denied the above Request for Admission, please provide the following information and documentation:

- a. Please identify each and every fact upon which Defendant relies in support of its denial;
- b. Please identify and produce and any all documentation, video and photographs upon which Defendant relies in support of its denial;
- c. Please state the names, address, telephone numbers and job titles of each and every individual upon whom the Defendant relies in support of its denial;
- d. Please provide a summary of the anticipated testimony of each said person identified herein.

**ANSWER:**

**REQUEST TO ADMIT NO. 17:**

Please admit or deny the following statement:

VAST Performance, LLC does not engage in the business of repairing motor

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vehicles for compensation of a single commercial, industrial or governmental establishment or two or more establishments related by common ownership or corporate affiliation.

**ANSWER:**

**INTERROGATORY NO. 17:**

If Defendant denied the above Request for Admission, please provide the following information and documentation:

- a. Please identify each and every fact upon which Defendant relies in support of its denial;
- b. Please identify and produce and any all documentation, video and photographs upon which Defendant relies in support of its denial;
- c. Please state the names, address, telephone numbers and job titles of each and every individual upon whom the Defendant relies in support of its denial;
- d. Please provide a summary of the anticipated testimony of each said person identified herein.

**ANSWER:**

**REQUEST TO ADMIT NO. 18:**

Please admit or deny the following statement:

VAST Performance, LLC does not engage solely in the business of performing work on unregistered motor vehicles and trailers.

**ANSWER:**

**INTERROGATORY NO. 18:**

If Defendant denied the above Request for Admission, please provide the following information and documentation:

If Defendant denied the above Request for Admission, please provide the following information and documentation:

- a. Please identify each and every fact upon which Defendant relies in support of its denial;
- b. Please identify and produce and any all documentation, video and photographs upon which Defendant relies in support of its denial;
- c. Please state the names, address, telephone numbers and job titles of each and every individual upon whom the Defendant relies in support of its denial;
- d. Please provide a summary of the anticipated testimony of each said person identified herein.

**ANSWER:**

**REQUEST TO ADMIT NO. 19:**

Please admit or deny the following statement:

Prior to June 10, 2011, VAST Performance, LLC performed services for Alex Zawel concerning his 2001 Audi S4.

**ANSWER:**

**INTERROGATORY NO. 19:**

If Defendant denied the above Request for Admission, please provide the following information and documentation:

- a. Please identify each and every fact upon which Defendant relies in support of its denial;
- b. Please identify and produce and any all documentation, video and photographs upon which Defendant relies in support of its denial;
- c. Please state the names, address, telephone numbers and job titles of each and every individual upon whom the Defendant relies in support of its denial;
- d. Please provide a summary of the anticipated testimony of each said person

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identified herein.

**ANSWER:**

**REQUEST TO ADMIT NO. 20:**

Please admit or deny the following statement:

When VAST Performance, LLC performed services for Alex Zawel concerning his 2001 Audi S4 prior to June 10, 2011, VAST Performance, LLC was not registered as a motor vehicle repair facility with the State of Michigan pursuant to the Motor Vehicle Service and Repair Act, MCL 257.1301, et. seq.

**ANSWER:**

**INTERROGATORY NO. 20:**

If Defendant denied the above Request for Admission, please provide the following information and documentation:

- a. Please identify each and every fact upon which Defendant relies in support of its denial;
- b. Please identify and produce and any all documentation, video and photographs upon which Defendant relies in support of its denial;
- c. Please state the names, address, telephone numbers and job titles of each and every individual upon whom the Defendant relies in support of its denial;
- d. Please provide a summary of the anticipated testimony of each said person identified herein.

**ANSWER:**

**REQUEST TO ADMIT NO. 21:**

Please admit or deny the following statement:

On April 20, 2009, VAST Performance, LLC, pursuant to Invoice #681, requested that Alex Zawel pay the sum of \$962.00.

**ANSWER:**

**INTERROGATORY NO. 21:**

If Defendant denied the above Request for Admission, please provide the following information and documentation:

- a. Please identify each and every fact upon which Defendant relies in support of its denial;
- b. Please identify and produce and any all documentation, video and photographs upon which Defendant relies in support of its denial;
- c. Please state the names, address, telephone numbers and job titles of each and every individual upon whom the Defendant relies in support of its denial;
- d. Please provide a summary of the anticipated testimony of each said person identified herein.

**ANSWER:**

**REQUEST TO ADMIT NO. 22:**

Please admit or deny the following statement:

When VAST Performance, LLC issued Invoice #681, dated April 20, 2009, to Alex Zawel, it was not registered with the State of Michigan as a motor vehicle repair facility under the Motor Vehicle Service and Repair Act, MCL 257.1301, et. seq.

**ANSWER:**

**INTERROGATORY NO. 22:**

If Defendant denied the above Request for Admission, please provide the following information and documentation:

- a. Please identify each and every fact upon which Defendant relies in support of its denial;

- b. Please identify and produce and any all documentation, video and photographs upon which Defendant relies in support of its denial;
- c. Please state the names, address, telephone numbers and job titles of each and every individual upon whom the Defendant relies in support of its denial;
- d. Please provide a summary of the anticipated testimony of each said person identified herein.

**ANSWER:**

**REQUEST TO ADMIT NO. 23:**

Please admit or deny the following statement:

On December 18, 2009, VAST Performance, LLC issued Invoice #1008 to Alex Zawel requesting that he pay the amount of \$6,168.00.

**ANSWER:**

**INTERROGATORY NO. 23:**

If Defendant denied the above Request for Admission, please provide the following information and documentation:

- a. Please identify each and every fact upon which Defendant relies in support of its denial;
- b. Please identify and produce and any all documentation, video and photographs upon which Defendant relies in support of its denial;
- c. Please state the names, address, telephone numbers and job titles of each and every individual upon whom the Defendant relies in support of its denial;
- d. Please provide a summary of the anticipated testimony of each said person identified herein.

**ANSWER:**

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**REQUEST TO ADMIT NO. 24:**

Please admit or deny the following statement:

When VAST Performance, LLC issued Invoice #1008 on December 18, 2009 to Alex Zawel, it was not registered with the State of Michigan as a motor vehicle repair facility under the Motor Vehicle Service and Repair Act, MCL 257.1301, et. seq.

**ANSWER:**

**INTERROGATORY NO. 24:**

If Defendant denied the above Request for Admission, please provide the following information and documentation:

- a. Please identify each and every fact upon which Defendant relies in support of its denial;
- b. Please identify and produce and any all documentation, video and photographs upon which Defendant relies in support of its denial;
- c. Please state the names, address, telephone numbers and job titles of each and every individual upon whom the Defendant relies in support of its denial;
- d. Please provide a summary of the anticipated testimony of each said person identified herein.

**ANSWER:**

**REQUEST TO ADMIT NO. 25:**

Please admit or deny the following statement:

On September 1, 2010, VAST Performance, LLC issued Invoice #2114 to Alex Zawel requesting that he pay the amount of \$2,537.056.

**ANSWER:**

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**INTERROGATORY NO. 25:**

If Defendant denied the above Request for Admission, please provide the following information and documentation:

- a. Please identify each and every fact upon which Defendant relies in support of its denial;
- b. Please identify and produce and any all documentation, video and photographs upon which Defendant relies in support of its denial;
- c. Please state the names, address, telephone numbers and job titles of each and every individual upon whom the Defendant relies in support of its denial;
- d. Please provide a summary of the anticipated testimony of each said person identified herein.

**ANSWER:**

**REQUEST TO ADMIT NO. 26:**

Please admit or deny the following statement:

When VAST Performance, LLC issued Invoice #2114 on September 1, 2010 to Alex Zawel, it was not registered with the State of Michigan as a motor vehicle repair facility pursuant to the Motor Vehicle Service and Repair Act, MCL 257.1301, et. seq.

**ANSWER:**

**INTERROGATORY NO. 26:**

If Defendant denied the above Request for Admission, please provide the following information and documentation:

- a. Please identify each and every fact upon which Defendant relies in support of its denial;
- b. Please identify and produce and any all documentation, video and photographs upon which Defendant relies in support of its denial;
- c. Please state the names, address, telephone numbers and job titles of each

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and every individual upon whom the Defendant relies in support of its denial;

- d. Please provide a summary of the anticipated testimony of each said person identified herein.

**ANSWER:**

**REQUEST TO ADMIT NO. 27:**

Please admit or deny the following statement:

On March 8, 2011, VAST Performance, LLC issued Invoice #100000145 to Alex Zawel requesting that he pay the amount of \$2,300.00.

**ANSWER:**

**INTERROGATORY NO. 27:**

If Defendant denied the above Request for Admission, please provide the following information and documentation:

- a. Please identify each and every fact upon which Defendant relies in support of its denial;
- b. Please identify and produce and any all documentation, video and photographs upon which Defendant relies in support of its denial;
- c. Please state the names, address, telephone numbers and job titles of each and every individual upon whom the Defendant relies in support of its denial;
- d. Please provide a summary of the anticipated testimony of each said person identified herein.

**ANSWER:**

**REQUEST TO ADMIT NO. 28:**

When VAST Performance, LLC issued Invoice #100000145 on March 8, 2011 to Alex Zawel, it was not registered with the State of Michigan as a motor vehicle repair facility under the Motor Vehicle Service and Repair Act,

MCL 257.1301, et. seq.

**ANSWER:**

**INTERROGATORY NO. 28:**

If Defendant denied the above Request for Admission, please provide the following information and documentation:

- a. Please identify each and every fact upon which Defendant relies in support of its denial;
- b. Please identify and produce and any all documentation, video and photographs upon which Defendant relies in support of its denial;
- c. Please state the names, address, telephone numbers and job titles of each and every individual upon whom the Defendant relies in support of its denial;
- d. Please provide a summary of the anticipated testimony of each said person identified herein.

**ANSWER:**

**REQUEST TO ADMIT NO. 29:**

Please admit or deny the following statement:

In response to Invoice #681, Alex Zawel paid VAST Performance, LLC the sum of \$962.00.

**ANSWER:**

**INTERROGATORY NO. 29:**

If Defendant denied the above Request for Admission, please provide the following information and documentation:

- a. Please identify each and every fact upon which Defendant relies in support of its denial;

- b. Please identify and produce and any all documentation, video and photographs upon which Defendant relies in support of its denial;
- c. Please state the names, address, telephone numbers and job titles of each and every individual upon whom the Defendant relies in support of its denial;
- d. Please provide a summary of the anticipated testimony of each said person identified herein.

**ANSWER:**

**REQUEST TO ADMIT NO. 30:**

Please admit or deny the following statement:

In response to VAST Performance, LLC's Invoice #1008, Alex Zawel paid VAST Performance, LLC the sum of \$6,168.00.

**ANSWER:**

**INTERROGATORY NO. 30:**

If Defendant denied the above Request for Admission, please provide the following information and documentation:

- a. Please identify each and every fact upon which Defendant relies in support of its denial;
- b. Please identify and produce and any all documentation, video and photographs upon which Defendant relies in support of its denial;
- c. Please state the names, address, telephone numbers and job titles of each and every individual upon whom the Defendant relies in support of its denial;
- d. Please provide a summary of the anticipated testimony of each said person identified herein.

**ANSWER:**

THE STROBLE LAW FIRM, P.C.  
ATTORNEYS AND  
COUNSELORS AT LAW

2525 TELEGRAPH RD, STE. 100  
BLOOMFIELD HILLS, MI 48302

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FAX (248) 456-8470



**REQUEST TO ADMIT NO. 31:**

Please admit or deny the following statement:

In response to Invoice #2114, Alex Zawel paid VAST Performance, LLC the sum of \$2,537.06.

**ANSWER:**

**INTERROGATORY NO. 31:**

If Defendant denied the above Request for Admission, please provide the following information and documentation:

- a. Please identify each and every fact upon which Defendant relies in support of its denial;
- b. Please identify and produce and any all documentation, video and photographs upon which Defendant relies in support of its denial;
- c. Please state the names, address, telephone numbers and job titles of each and every individual upon whom the Defendant relies in support of its denial;
- d. Please provide a summary of the anticipated testimony of each said person identified herein.

**ANSWER:**

**REQUEST TO ADMIT NO. 32:**

Please admit or deny the following statement:

In response to Invoice #100000145, Alex Zawel paid VAST Performance, LLC the sum of \$2,300.00.

**ANSWER:**

**INTERROGATORY NO. 32:**

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If Defendant denied the above Request for Admission, please provide the following information and documentation:

- a. Please identify each and every fact upon which Defendant relies in support of its denial;
- b. Please identify and produce and any all documentation, video and photographs upon which Defendant relies in support of its denial;
- c. Please state the names, address, telephone numbers and job titles of each and every individual upon whom the Defendant relies in support of its denial;
- d. Please provide a summary of the anticipated testimony of each said person identified herein.

**ANSWER:**

**REQUEST TO ADMIT NO. 33:**

Please admit or deny the following statement:

The invoices provided to Alex Zawel include charges for work related to the diagnostic work for his 2001 Audi S4.

**ANSWER:**

**INTERROGATORY NO. 33:**

If Defendant denied the above Request for Admission, please provide the following information and documentation:

- a. Please identify each and every fact upon which Defendant relies in support of its denial;
- b. Please identify and produce and any all documentation, video and photographs upon which Defendant relies in support of its denial;
- c. Please state the names, address, telephone numbers and job titles of each and every individual upon whom the Defendant relies in support of its denial;
- d. Please provide a summary of the anticipated testimony of each said person

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identified herein.

**ANSWER:**

**REQUEST TO ADMIT NO. 34:**

VAST Performance, LLC is currently registered with the State of Michigan as a motor vehicle repair facility under the Motor Vehicle Service and Repair Act, MCL 257.1301, et. seq.

**ANSWER:**

**INTERROGATORY NO. 35:**

If Defendant denied the above Request for Admission, please provide the following information and documentation:

- a. Please identify each and every fact upon which Defendant relies in support of its denial;
- b. Please identify and produce and any all documentation, video and photographs upon which Defendant relies in support of its denial;
- c. Please state the names, address, telephone numbers and job titles of each and every individual upon whom the Defendant relies in support of its denial;
- d. Please provide a summary of the anticipated testimony of each said person identified herein.

**ANSWER:**

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Respectfully submitted,

THE STROBLE LAW FIRM, P.C.

/s/Mitchell H. Boardman

Thomas L. Stroble (P67836)

Mitchell H. Boardman (P47042)

Attorneys for Plaintiff

2525 Telegraph Road, Suite 100

Bloomfield Hills, MI 48302

(248) 454-0800/fax (248) 456-8470

Proof of Service

The undersigned certifies that a copy of the foregoing instrument was served upon the attorneys of record of all parties to the above cause by electronic filing at their respective e-mail addresses as disclosed by the pleadings of record herein, on the 1<sup>st</sup> day of November, 2011. I declare under penalty of perjury that the statement above is true to the best of my knowledge, information and belief.

/s/Cheryl J. Swindlehurst

Cheryl J. Swindlehurst

THE STROBLE LAW FIRM, P.C.  
ATTORNEYS AND  
COUNSELORS AT LAW

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