

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

SUSAN VINEYARD,)
)
 Complainant,)
)
 v.) Docket No: 04-0094
)
 CENTRAL ILLINOIS PUBLIC SERVICE)
 COMPANY d/b/a AmerenCIPS,)
)
 Respondent.)

RESPONDENT'S REQUEST FOR
INTERROGATORIES TO COMPLAINANT

NOW COMES Respondent Central Illinois Public Service Company d/b/a AmerenCIPS ("CIPS"), by and through its attorneys, Brown, Hay & Stephens, LLP and Elliott M. Hedin, propound the following Interrogatories:

1. What is your full name, age, Social Security number, address, and telephone number? *SUSAN CHRISTINA VINEYARD, [REDACTED], AGE 58, 301 E OAK W.F. ILL, 618-932-3222*
2. By what other name or names are you known? *SUSAN WRIGHT 1946-1967; SUSAN VINEYARD 1967-1971; SUSAN VINEYARD OSTERMANN 1971-1973; SUSAN VINEYARD 1973 TO PRESENT*
3. Describe the premises that you occupy, give the address and tell how long you have lived there. *301 E OAK; WEST FRANKFORT, ILL*
4. State the address, area, legal description, and fair market value of any property you currently own. *301 E OAK; WF. - \$65,000 - 75,000*
5. List every permanent and temporary residence in which you have lived during the last ten years. List addresses in reverse chronological order starting with your current address. *301 E OAK ST WF 5/15/2002 to present
486 VASSAR AV BERKELEY CAL 6/97 to 11/2001
11/01-4/02 77.5 CARRETERA TIJUANA - BAJAMAR TH7 ENSENADA BC MEX
5975 SILVERADO TRAIL NAPA CAL 5/1978 to 6/1997
6075 ST HELENA Hwy; NAPA CAL 5/1974 to 5/1978*

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6. State the name and address of your employer, the position held by you, the dates on which you are compensated for your services, and the amount you are paid for your services. *SELF EMPLOYED.*

7. List every job you have held for the ten year period immediately prior to March 26, 2004, beginning with your present employment. *VINEYARD COLLECTION Co. AUGUST 6, 1986 to present; VINEYARD WINE COMPANY 5/74 - 5/1988*

8. Are you self-employed or do you own all or any part of a business as sole owner, partner, or stockholder? *SELF EMPLOYED*

9. If your answer to the previous question is in the affirmative, state the name and address of the business, the nature of your ownership interest, and how and when you draw money from it. *Vineyard Collection Co - 100% - paid when money is available.*

10. Have you owned all or any part of a business as sole owner, partner, or stockholder in the last ten years? *VINEYARD COLLECTION^(ALL) Co; part S & V Prop Mgmt. WESTPORT Property MANAGEMENT (100%)*

11. If your answer to the previous question is in the affirmative, state the name and address of the business, the nature of your ownership interest, and how and when you draw money from it. *see above response*

12. If your spouse or any dependent claimed by you is self-employed or owns all or any part of a business, state the name and address of the business, the nature of his or her ownership interest in the business, and the amount of income derived from the business. *n/a*

13. Within the past five years, have you ever been involved in any judicial or administrative proceeding? If so, state the nature thereof, the court in which the case was filed and the case number. *yes*

08-42607 U.S. Bankruptcy Court - 4/2000 to 4/19/2004 - CLOSED per B SA
Assignee of ABTS vs Greater Capital Marc Cohn, Steven Cohn FRANK
Assignee of Philip Sherken vs William Tsui, Tammy Tsui, John Kuyka - CA
Assignee of Delrona Rental Corp vs William Tsui, TAMMY TSUI - Sacramento & Taiwan