

C A N A D A

**PROVINCE OF QUEBEC
DISTRICT OF MONTRÉAL
LOCALITY OF MONTRÉAL**

No: 500-06-000504-106

(Class Action)

SUPERIOR COURT

CARLOS FOGELMAN

Petitioner

v.

SONY CORPORATION

and

SONY OF CANADA LTD.

and

SONY CORPORATION OF AMERICA

and

SONY OPTIARC, INC.

and

SONY OPTIARC AMERICA INC.

and

SONY NEC OPTIARC, INC.

and

TOSHIBA CORPORATION

and

**TOSHIBA AMERICA CONSUMER
PRODUCTS, LLC**

and

TOSHIBA OF CANADA LIMITED

and

**SAMSUNG ELECTRONICS COMPANY,
LTD.**

and

SAMSUNG ELECTRONICS AMERICA INC.

and

SAMSUNG ELECTRONICS CANADA INC.

and

**TOSHIBA SAMSUNG STORAGE
TECHNOLOGY CORPORATION**

and

HITACHI, LTD.

and

HITACHI CANADA, LTD.
and
HITACHI AMERICA LTD.
and
LG ELECTRONICS, INC.
and
LG ELECTRONICS CANADA
and
LG ELECTRONICS USA, INC.
and
HITACHI-LG DATA STORAGE, INC.
and
**KONINKLIJKE PHILIPS ELECTRONICS
N.V.**
and
**PHILIPS ELECTRONICS NORTH AMERICA
CORPORATION**
and
PHILIPS CANADA LTD.
and
LITE-ON IT CORPORATION
and
**PHILIPS & LITE-ON DIGITAL SOLUTION
CORPORATION**
and
**PHILIPS & LITE-ON DIGITAL SOLUTIONS
USA, INC.**
and
NEC CORPORATION
and
NEC ELECTRONICS AMERICA, INC.
and
TEAC CORPORATION
and
TEAC AMERICA, INC.
and
TEAC CANADA LTD.

Respondents

ANSWER
(art. 147 C.C.P.)

IN ANSWER TO THE ORIGINATING APPLICATION, THE RESPONDENT TOSHIBA SAMSUNG STORAGE TECHNOLOGY CORPORATION STATES THE FOLLOWING:

1. The Respondent Toshiba Samsung Storage Technology Corporation intends to contest the originating application of the Petitioner and to cooperate with him in preparing the case protocol that is to govern the conduct of the proceedings;
2. The Respondent Toshiba Samsung Storage Technology Corporation is represented by Mtre Noah Boudreau, whose contact information are the following:

Mtre Noah Boudreau
Fasken Martineau DuMoulin LLP
800 Victoria Square, Suite 3700
P.O. Box 242
Montréal Quebec H4Z 1E9

Phone: +1 514 394 4521
Fax: +1 514 397 7600
Email: nboudreau@fasken.com

3. The Respondent Toshiba Samsung Storage Technology Corporation reserves all of its rights, including the right to contest this Court's jurisdiction.

Montréal, this June 10, 2019



Fasken Martineau DuMoulin LLP
Attorneys for Toshiba of Canada Limited,
Toshiba Corporation, Toshiba America
Consumer Products, LLC and Toshiba
Samsung Storage Technology Corporation

800 Victoria Square, Suite 3700
P.O. Box 242
Montréal, Quebec H4Z 1E9
Fax number: +1 514 397 7600

Mtre Noah Boudreau
Phone number: +1 514 394 4521
Email: nboudreau@fasken.com

N° : 500-06-000504-106

PROVINCE OF QUEBEC
SUPERIOR COURT
DISTRICT OF MONTRÉAL
LOCALITY OF MONTRÉAL

CARLOS FOGELMAN

Petitioner

v.

SONY CORPORATION & AL.

Respondents

16989/295069.00001

BF1339

Answer (art. 147 C.C.P.)

Toshiba Samsung Storage Technology Corporation
(Class Action)

Amount in dispute: 0,00 \$

ORIGINAL

Fasken Martineau DuMoulin LLP

800 Victoria Square, Suite 3700

P.O. Box 242

Montréal, Quebec H4Z 1E9

Me Noah Boudreau

nboudreau@fasken.com

Tél. +1 514 394 4521

Fax: +1 514 397 7600