

CANADA

(CLASS ACTION)  
SUPERIOR COURT

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PROVINCE DE QUEBEC  
DISTRICT OF MONTRÉAL

ARIANE KNAFO

**NO: 500-06-001202-221**

Plaintiff

v.

BARILLA CANADA INC.

Defendant

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**SWORN STATEMENT OF DOYLE BROWN FOR DEFENDANT  
BARILLA CANADA INC.**

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I, the undersigned, **Doyle Brown**, carrying on business at 140 Allstate Parkway, Suite 200, in the city of Markham, Canada do solemnly declare the following:

1. I am the Marketing Director of Barilla Canada Inc. ("**Barilla Canada**") defendant in this proceeding, and as such have knowledge of the matters deposed herein.
2. I have read the Application for authorization to institute a class action dated October 22, 2022 (the "**Application**").
3. The Barilla Group ("**Barilla**") was founded in Parma, Italy, in 1877, and is an Italian family-owned company specializing in the production of pasta.
4. Barilla brand pasta is the #1 brand of pasta in Italy, based on sales volume.
5. Barilla Canada is a pasta production company headquartered in the City of Markham, Ontario, Canada and part of the Barilla Group.
6. ITALY'S #1 BRAND OF PASTA™ is a trademark used by Barilla Canada since at least 2009 as a way to distinguish its products from other pasta brands in the Canadian market.
7. Barilla Canada uses the same recipe i.e. the same ingredients (Semolina and Durum wheat flour) within the same proportion used in Barilla's pasta production worldwide, including Italy.
8. Barilla Canada uses the same processes and know-how for the transformation of Durum wheat into Semolina that Barilla uses worldwide, including Italy.

9. All the facts mentioned herein are true to my personal knowledge.

And I have signed in Markham, on  
February 27, 2023

*Doyle Brown*

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**DOYLE BROWN**

Sworn before me, in Montreal, on  
February 27, 2023 by videoconference

*Martin Laprade*

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Martin Laprade (138734)  
Commissioner of Oaths for the  
Province of Quebec and outside  
Quebec

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