

CANADA

PROVINCE OF QUÉBEC  
DISTRICT OF MONTRÉAL

N°: 500-06-001223-235

SUPERIOR COURT  
(Class Action Division)

---

MARGARET SAKHRANI

Applicant

v.

L'ORÉAL CANADA INC.

L'ORÉAL USA INC.

L'ORÉAL USA PRODUCTS INC.

STRENGTH OF NATURE LLC

GODREJ DISTRIBUTORS CANADA LTD.

SOFT SHEEN-CARSON LLC

NAMASTE LABORATORIES LLC

DABUR USA INC.

DABUR INTERNATIONAL LTD.

Respondents

---

**ANSWER OF RESPONDENTS DABUR INTERNATIONAL LIMITED**

**AND DABUR USA INC.**

(Art. 145 and 147 C.C.P.)

---

**PURSUANT TO PETITIONER'S MOTION FOR AUTHORIZATION TO INSTITUTE A CLASS ACTION, THE RESPONDENTS, DABUR INTERNATIONAL LIMITED AND DABUR USA INC., STATE THAT:**

1. The Respondents Dabur International Limited and Dabur USA Inc. are represented by Bennett Jones LLP whose contact information is as follows:

Mtre. Pascale Dionne-Bourassa  
900 boulevard de Maisonneuve Ouest

Suite 1800  
Montréal, Québec H3A 0A8  
Telephone: 514-865-5844  
[bourassap@bennettjones.com](mailto:bourassap@bennettjones.com)

Mtre. Cheryl M. Woodin  
3400 One First Canadian Place  
P.O. Box 130  
Toronto, Ontario M5X 1A4  
Telephone: 416-777-6550  
Fax: 416-863-1716  
woodinc@bennettjones.com

Mtre. Alexander Payne  
3400 One First Canadian Place  
P.O. Box 130  
Toronto, Ontario M5X 1A4  
Telephone: 416-777-5512  
Fax: 416-863-1716  
[paynea@bennettjones.com](mailto:paynea@bennettjones.com)

2. The Respondent, Dabur International Limited, contests the Québec Court's jurisdiction; Dabur International Limited is a foreign entity incorporated in the Isle of Man and does not manufacture or sell any hair relaxer products.
3. The Respondent, Dabur USA Inc., contests the Québec Court's jurisdiction; Dabur USA Inc. was a foreign entity incorporated in New Jersey before it was dissolved on December 14, 2015 prior to commencing business.
4. Without prejudice to the above, pending a decision on the issue of jurisdiction, Respondents, Dabur International Limited and Dabur USA Inc., confirm that they will contest Plaintiffs' Motion for authorization to institute a class action. Respondents, Dabur International Limited and Dabur USA Inc., therefore reserve all their rights.

Montréal, July 28, 2023

*Bennett Jones LLP*

---

---

**BENNETT JONES LLP**

Attorneys for Respondents  
Dabur International Limited.  
and Dabur USA Inc.

Mtre. Pascale Dionne-Bourassa

Bennett Jones LLP

900 boulevard de Maisonneuve O.

Montréal, Québec

H3A 0A8

Telephone: 514-865-5844

[bourassap@bennettjones.com](mailto:bourassap@bennettjones.com)

**SUPERIOR COURT  
DISTRICT OF QUEBEC  
500-06-001223-235**

**MARGARET SAKHRANI**

Petitioner

v.

**L'ORÉAL CANADA INC. ET AL.**

Respondents

**BENNETT JONES LLP ANSWER FOR  
DABUR INTERNATIONAL LIMITED  
AND DABUR USA INC.**

**COPY**

**BB 9658**

**File: 010992.00007**

**M<sup>e</sup> Pascale Dionne-Bourassa  
Bennett Jones LLP  
900 boul. de Maisonneuve O.  
Montréal, Québec  
H3A 0A8  
Telephone: 514-865-5844  
bourassap@bennettjones.com**