

CANADA
PROVINCE OF QUÉBEC
DISTRICT OF MONTRÉAL

SUPERIOR COURT
(Class Actions)

No.: **500-06-001246-236**

FRANK FIOLA

Applicant

v.

GENERAL MOTORS COMPANY

-and-

**GENERAL MOTORS OF CANADA
COMPANY**

Defendants

ANSWER
(Art. 145 al 2 and 147 C.C.P.)

IN RESPONSE TO THE SUMMONS, DEFENDANT STATES THE FOLLOWING:

1. Defendants GENERAL MOTORS COMPANY and GENERAL MOTORS OF CANADA COMPANY are represented by the undersigned lawyers, whose contact details appear below, under their signature.
2. Defendants by their undersigned lawyers, answers Plaintiff's Judicial Application Originating a Proceeding, so as to:
 - negotiate a settlement;
 - propose a mediation;
 - propose a settlement conference;
 - contest the judicial application and establish a case protocol with Plaintiff.
3. Defendants reserve all their rights, including the right to challenge the jurisdiction of this Court.

Montréal, June 28th, 2023

Borden Ladner Gervais

Borden Ladner Gervais LLP

Lawyers for Defendants

Mtre. Stéphane Pitre

Mtre. Anne Merminod

1000 De La Gauchetière Street West

Suite 900

Montréal QC H3B 5H4

Tel.: 514.954.3147

514.954.2529

Fax: 514.954.1905

Email: spitre@blg.com

amerminod@blg.com

Notification: notification@blg.com

O/File: 004871-000842

SUPERIOR COURT
(Class Actions)

DISTRICT OF MONTRÉAL
No.: **500-06-001246-236**

FRANK FIOLA

Applicant

v.

GENERAL MOTORS COMPANY
and

GENERAL MOTORS OF CANADA COMPANY
Defendants

ANSWER
(Art. 145 al.2 C.C.P.)

ORIGINAL

BLG
Borden Ladner Gervais
B.M. 2545

1000, De La Gauchetière Street West
Suite 900
Montréal, QC, Canada H3B 5H4
Tel.: 514.879.1212
Fax: 514.954.1905
spitre@blg.com
amerminod@blg.com
Mtre. Stéphane Pitre
Mtre. Anne Merminod
File: 004871-000842