

CANADA
PROVINCE OF QUÉBEC
DISTRICT OF MONTRÉAL

SUPERIOR COURT
(Class Actions)

No.: **500-06-001241-237**

LUCIA PALLANTE
and
EMILY PERREAULT

Applicants

vs.

ARC AUTOMOTIVE INC.
and
JOYSON SAFETY SYSTEMS formely
known as **KEY SAFETY SYSTEMS INC.**
and
TOYODA GOSEI NORTH AMERICA
CORPORATION
and
GENERAL MOTORS OF CANADA
COMPANY
and
FORD MOTOR COMPANY OF CANADA,
LIMITED
and
VOLKSWAGEN GROUP CANADA INC.
AUDI CANADA INC.
and
BMW CANADA INC.
and
PORSCHE CARS CANADA, LTD
and
HYUNDAI MOTOR AMERICA
and
KIA CANADA INC.
and
FCA CANADA INC.

Defendants

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

IN RESPONSE TO THE SUMMONS, DEFENDANT STATES THE FOLLOWING:

1. Defendant GENERAL MOTORS OF CANADA COMPANY is represented by the undersigned lawyers, whose contact details appear below, under their signature.
2. Defendant by its 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. Defendant reserve all its rights, including the right to challenge the jurisdiction of this Court.

Montréal, July 6th, 2023

Borden Ladner Gervais

Borden Ladner Gervais LLP

Lawyers for Defendant GENERAL
MOTORS OF CANADA COMPANY

Mtre. Stéphane Pitre

Mtre. Alexandra Hébert

1000 De La Gauchetière Street West

Suite 900

Montréal QC H3B 5H4

Tel.: 514.954.3147

514.954.3115

Fax: 514.954.1905

Email: spitre@blg.com

ahebert@blg.com

Notification: notification@blg.com

O/File: 004871-000846

SUPERIOR COURT
(Class Actions)
DISTRICT OF MONTRÉAL
No.: **500-06-001241-237**

LUCIA PALLANTE
and
EMILY PERREAULT

Applicants

v.

ARC AUTOMOTIVE, INC.
and
**JOYSON SAFETY SYSTEMS, formerly known
as KEY SAFETY SYSTEMS INC.**
and
**TOYODA GOSEI NORTH AMERICA
CORPORATION**
and
GENERAL MOTORS OF CANADA COMPANY
and al.

ANSWER
(Art. 145 al.2 and 147 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
ahebert@blg.com
Mtre. Stéphane Pitre
Me Alexandra Hébert
File: 004871-0000846