

CANADA

**SUPERIOR COURT  
(Class Action)**

**PROVINCE OF QUÉBEC  
DISTRICT OF MONTREAL**

N°: 500-06-001253-232

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**ELIAS KARRAS**

Applicant

v.

**MAPLE LEAF FOODS INC.**

- and -

**METRO INC.**

- and -

**WAL-MART CANADA CORP.**

- and -

**LOBLAW COMPANIES LIMITED**

- and -

**LOBLAWS INC.**

- and -

**GEORGE WESTON LIMITED**

- and -

**WESTON FOODS DISTRIBUTION INC.**

- and -

**WESTON FOODS (CANADA) INC.**

Defendants

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**APPLICATION BY DEFENDANT MAPLE LEAF FOODS INC. FOR LEAVE TO  
ADDUCE RELEVANT EVIDENCE  
(Article 574 C.C.P.)**

**TO THE HONOURABLE JUSTICE MARTIN F. SHEEHAN OF THE SUPERIOR COURT  
OF QUEBEC, SITTING IN AND FOR THE DISTRICT OF MONTREAL, DEFENDANT  
MAPLE LEAF FOODS INC. RESPECTFULLY SUBMITS THE FOLLOWING:**

## I. INTRODUCTION

1. Defendant Maple Leaf Foods Inc. (“**MLF**”) seeks leave to adduce relevant evidence in order to establish facts that are necessary to enable this Court to undertake an informed analysis, in light of the criteria set out in article 575 of the *Code of Civil Procedure* (the “**CCP**”) regarding the authorization to institute class action proceedings.
2. On or around, July 26, 2023, the Applicant filed an *Application to authorize the bringing of a class action* (the “**Application**”), as appears from the record.
3. The Application seeks compensatory and punitive damages against the defendants for having allegedly been involved in price-fixing agreements with respect to meat products, characterized by Applicant as the “meat cartel”.
4. As appears from paragraph 15 of the Application, the Applicant seeks to represent a class comprised of the following persons:

“All persons, entities, partnerships or organizations resident in Quebec who purchased at least one product included in the “meat categories” referred to in the email sent by Michael McCain on March 22, 2007 at 14h12 (including beef, chicken and pork), produced, supplied or sold by one of the Defendants;”

5. The Applicant seeks leave to institute a class action pursuant to certain provisions of the *Competition Act*, notably sections 45 and 46, the *Civil Code of Quebec*, notably articles 6, 7, and 1457, and the *Consumer Protection Act*, notably articles 215, 219, 228 and 272.
6. MLF hereby requests leave to adduce evidence at the authorization hearing in support of its submissions that the Application fails to meet the threshold authorization conditions set forth at Article 575 CCP.

## II. THE EVIDENCE THAT MLF SEEKS TO ADDUCE

7. The evidence which MLF seeks leave to adduce is eminently relevant and appropriate to the authorization inquiry proposed by the Applicant as it pertains to Maple Leaf.
8. In the Application, the Applicant notably alleges that MLF was involved in an illegal price-fixing scheme with co-defendants to sell meat products at an artificially inflated price.
9. These allegations are based on a single email dated from March 22, 2007 (the “**2007 Email**”), that surfaced from the Information to obtain warrants (“**ITO**”) (Exhibit P-3) issued by the Competition Bureau in the context of the “bread cartel” proceedings.

10. These allegations contained in the Application are vague, unsubstantiated and inaccurate with respect to the essential components of the supposed legal syllogism required to establish a cause of action against MLF.
11. To ensure this Court has all of the relevant and accurate evidence necessary to address these issues, MLF hereby requests leave to file the following evidence in order to dispel these false or vague assumptions:
  - (a) A sworn statement of Mtre Nathalie Grand’Pierre, dated January 31, 2024, (the “**Sworn Statement**”) along with exhibits NGP-1 to NGP-13 in support thereof, the whole communicated herewith as **Exhibit RML-1**.
12. The evidence MLF wishes to adduce is limited to remedy the vague, incomplete and inaccurate allegations of the Application by demonstrating, *inter alia*, that:
  - (a) There is no public information regarding any ongoing regulatory investigation in respect of meat products in Canada.
  - (b) MLF is the only meat producer named as a defendant in this action, and none of the co-defendants are horizontal and direct competitors of MLF.
  - (c) The ITO and the 2007 Email it contains were made public and were accessible as of November 2019.
13. For these reasons, Maple Leaf respectfully submits that such evidence is relevant at the authorization stage to fully appreciate if the Applicant has met his burden with regards to MLF.

### III. **GROUND IN SUPPORT OF THE PRESENT APPLICATION**

14. It appears from Applicant’s Application that it contains many general, incomplete, vague or inaccurate allegations which are prejudicial to MLF, such that the latter should be afforded the opportunity to adduce evidence which will correct, complete and bring more precision to the allegations made by the Applicant.
15. The evidence that MLF is hereby seeking to adduce is both useful and necessary to demonstrate that the facts alleged by the Applicant are inaccurate and do not justify the conclusions sought, such that the proposed class action is untenable and doomed to fail as it pertains to MLF.
16. The evidence presented in support herein is very limited in scope and is thus consistent with the nature of the authorization process and the principle of proportionality.
17. The present application for leave to adduce relevant evidence is well-founded in fact and in law.

**WHEREFORE MAY IT PLEASE THIS COURT TO:**

**GRANT** the present *Application for leave to adduce relevant evidence*.

**AUTHORIZE** Defendant Maple Leaf Foods Inc. to file the sworn statement of Mtre Nathalie Grand’Pierre, dated January 31, 2024, along with exhibits NGP-1 to NGP-13 in support thereof;

**THE WHOLE** without costs, except in case of contestation.

MONTREAL, January 31, 2024

*Osler, Hoskin & Harcourt LLP*

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Our file: 1249156

**NOTICE OF PRESENTATION**

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Lawyers for Defendants Loblaw Companies Limited, Loblaws Inc., George Weston Limited, Weston Food Distribution Inc. and Weston Foods Inc.

**TAKE NOTICE** that the present *Application by Defendant Maple Leaf Foods Inc. for Leave to Adduce Relevant Evidence* will be presented for hearing and allowance at a date and time to be determined by the Honourable Martin F. Sheehan of the Superior Court of Québec, 1 Notre-Dame Street East, Montreal, Québec.

**DO GOVERN YOURSELVES ACCORDINGLY.**

MONTRÉAL, January 31, 2024

*Osler, Hoskin & Harcourt LLP*

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- and -

**WESTON FOODS (CANADA) INC.**

Defendants

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<p><b>LIST OF EXHIBITS OF DEFENDANT MAPLE LEAF FOODS INC.</b></p>
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<p><b>Exhibit RML-1:</b></p>	<p>Sworn statement of Mtre Nathalie Grand’Pierre, dated January 31, 2024, and exhibits NGP-1 to NGP-13</p>
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MONTRÉAL, January 31, 2024

*Osler, Hoskin & Harcourt LLP*

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Defendants

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**SWORN STATEMENT OF NATHALIE GRAND'PIERRE**

I, the undersigned, Nathalie Grand'Pierre, lawyer, exercising my profession at 1000 De La Gauchetière Street West, Suite 2100, Montréal, Québec, do hereby solemnly declare as follows:

1. I am a lawyer working at Osler, Hoskin & Harcourt LLP, specialized in the review of documentation and data, evidence management and eDiscovery, for litigation matters.

2. I have reviewed the *Application to authorize the bringing of a class action* dated July 26, 2023 (the “**Application**”) filed by Applicant against Maple Leaf Foods Inc. (“**MLF**”) and other defendants, along with Exhibits P-1 to P-16 in support thereof. For the purposes of preparing this affidavit, and as set out below, I have also conducted a number of media, internet and court searches to try to identify any publicly reported information relating to the allegations of anti-competitive practices in the meat industry in Canada that are set out in the Application.
- A. **There is No Public Information in respect of Any Regulatory Investigation in respect of Meat Products in Canada**
3. On January 30, 2023, I conducted a number of media, internet and court searches to try to identify allegations of anti-competitive pricing practices relating to meat products in Canada. In conducting a range of searches, I used different combinations of the following keywords: “price-fixing”; “price fixing”; “fixation des prix”; “cartel”; “anticompetitive”; “anticonpétitif”; “viande”; “meat”; “meat products”. I also conducted searches of the Competition Bureau’s website at <https://ised-isde.canada.ca/site/competition-bureau-canada/en>, as well as on the CBA’s national class action registry, and the Quebec registry of class actions. I also conducted searches on canlii.org of any reported decisions that might relate to this matter.
4. Based on my searches, I did not locate or identify any public report that indicates that the Competition Bureau or any other regulator in Canada is conducting an investigation in respect of anti-competitive pricing practices relating to meat products in Canada.
5. Based on my searches, I did not locate or identify any other class action in Canada that alleges anti-competitive pricing practices relating to meat products in Canada, except the two mentioned below, which are based on completely different facts and involve different defendants.
6. I did identify a small number of news and articles relating to the present proceedings. I also found that on or about March 24, 2022, a motion for authorization to bring a class action, alleging notably illegal price-fixing practices against several companies that purchase and slaughter cattle, and then process and sell the meat, had been filed in the Superior Court of Québec file bearing docket number 500-06-001180-229 (the “**Québec Beef Class Action**”). Based on my review of this proceeding, the plaintiff’s claims are focused on companies that purchase and slaughter cattle.
7. Based on my review of that matter, on November 1, 2022, Justice Donald Bisson, J.S.C., stayed the Québec Beef Class Action considering that a parallel action had been filed on or about February 18, 2022, before the Supreme Court of British Columbia in court file no. S-221365 (the “**BC Beef Class Action**”), as it appears from Justice Bisson’s decision communicated in support hereof as **Exhibit NGP-1**, and the originating application in the BC Beef Class Action communicated in support hereof as **Exhibit NGP-2**.
8. Based on my review, MLF is not named as a defendant or even mentioned in either the Québec Beef Class Action or the BC Beef Class Action.

**B. MLF is Not a Party to the Bread Class Action in Quebec**

9. I understand that the same plaintiff's counsel who filed the Application in this matter are also prosecuting a separate class action in Quebec in respect of bread products in the Superior Court of Québec file bearing docket number 500-06-000888-178 (the "**Québec Bread Class Action**"), as it appears from the originating application dated March 25, 2020, communicated in support hereof as **Exhibit NGP-3**.
10. Based on my review, these proceedings are limited to bread products. The plaintiffs in these proceedings have not named MLF as a party to these proceedings. The plaintiffs in those proceedings have not asserted any anti-competitive conduct that involved MLF.
11. Based on my searches, MLF was a named defendant in a class action filed in the Ontario Superior Court of Justice bearing court file number CV-17-586063-00CP (the "**Ontario Bread Class Action**"). On December 31, 2021, Justice Morgan, S.C.J. dismissed the motion to certify this class action against MLF, as it appears from the decision communicated in support hereof as **Exhibit NGP-4**.
12. I did identify that a motion seeking to recertify the claims against MLF has been filed by Plaintiff, as appears from a copy of the Notice of Motion dated August 4, 2023, communicated in support hereof as **Exhibit NGP-5**. However, based on my searches, the court has not ruled on that motion.
13. Based on my review of exhibits NGP-3, NGP-4 and NGP-5 and my searches, the claims that have been asserted in the Quebec Class Action and the Ontario Bread Class Action do not include any claims in respect of meat products.

**C. The Business of the Defendants**

14. According to publicly available information as of January 30, 2023, the defendants' core business are as follows:
  - (a) MLF produces food products under leading brands including Maple Leaf®, Maple Leaf Prime®, Maple Leaf Natural Selections®, Schneiders®, Schneiders® Country Naturals®, Mina®, Greenfield Natural Meat Co.®, Lightlife® and Field Roast™. MLF's portfolio includes meats, ready-to-cook and ready-to-serve meals, snacks, kits, valued-added fresh pork and poultry, and plant protein products, as it appears from a copy of MLF's Annual Report to Shareholders as of December 31, 2022, communicated in support hereof as **Exhibit NGP-6**;
  - (b) Metro Inc. ("**Metro**") is notably a food company which operates close to 1000 food retail stores under several banners including Metro, Metro Plus, Super C, Food Basis, Adonis and Première Moisson, as it appears from a extract of Metro's website communicated in support hereof as **Exhibit NGP-7**;
  - (c) Wal-Mart Canada Corp. ("**Walmart Canada**") is an omnichannel retailer that operates more than 400 stores providing a large array of goods and services

included in a one-stop shop, as it appears from an extract of Walmart Canada's website, communicated in support hereof as **Exhibit NGP-8**;

- (d) Loblaw Companies Limited ("**LCL**") is one of Canada's largest food distributors, as it appears from an extract of LCL's website, communicated in support hereof as **Exhibit NGP-9**;
- (e) Loblaws Inc. ("**Loblaws**") operates a large network of food retail stores, as it appears from an extract of Loblaws' website, communicated in support hereof as **Exhibit NGP-10**. Loblaws is owned and controlled by LCL, as it appears from Exhibit P-10 in support of the Application;
- (f) Weston Foods Distribution Inc. and Weston Foods (Canada) Inc. (collectively "**Weston Foods**") is a leading North American bakery company actively participating across segments of the bakery market, as it appears from an extract of Weston Foods' website, communicated in support hereof as **Exhibit NGP-11**;
- (g) George Weston Limited ("**GWL**") owns and controls LCL and Weston Foods, as it appears from Exhibit P-9, P-12 and P-13.1 in support of the Application.

15. I have conducted searches to identify the leading meat manufacturers in Canada. Based on my searches, the Top 10 Meat Producers in Canada are: Maple Leaf Foods, JBS Canada, Olymel, Cargill, Hylife, Conestoga Meat Packers, St. Helen's Meat Packers, Sofina Foods, Donald's Fine Foods and Sunterra Meats, as appears from the information found at <https://essfeed.com/canadas-top-10-largest-meat-producers/>, a copy of which is communicated in support hereof as **Exhibit NGP-12**.

#### **D. The Email at Exhibit P-8.1**

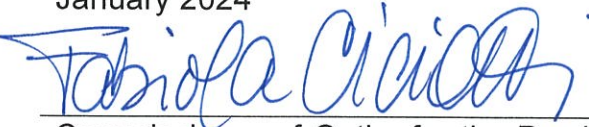
- 16. I have reviewed the excerpt of the email from Ms. Perkins dated March 22, 2007, attached at Exhibit P-8.1
- 17. I have made inquiries with MLF to obtain a complete version of this email in its native format, a copy of which is communicated in support hereof as **Exhibit NGP-13**.
- 18. The names and complete email addresses of the recipients of this email are: Réal Ménard ([MenardRe@Mapleleaf.Ca](mailto:MenardRe@Mapleleaf.Ca)), Doug Gingrich ([GingriDo@Mapleleaf.Ca](mailto:GingriDo@Mapleleaf.Ca)), Michele S. Hardinge ([HardinMS@MapleLeaf.ca](mailto:HardinMS@MapleLeaf.ca)), C. Barry McLean ([McLeanCB@Mapleleaf.Ca](mailto:McLeanCB@Mapleleaf.Ca)), Rick Young ([YoungRI@MapleLeaf.ca](mailto:YoungRI@MapleLeaf.ca)), and Richard A. Lan ([LanRA@MapleLeaf.ca](mailto:LanRA@MapleLeaf.ca)).
- 19. Based on my review, the email is an internal email, and does not refer to or include any communications with any other meat producer in Canada.
- 20. Based on my review, I understand that this email has been public since November 2019, when the ITO filed as exhibit P-3 in support of the Application became publicly available.

21. To my knowledge, all the facts alleged herein are true.

AND I HAVE SIGNED:

  
\_\_\_\_\_  
**NATHALIE GRAND'PIERRE**

SOLEMNLY DECLARED before me in  
Montréal, Québec, this 31<sup>st</sup> day of  
January 2024

  
\_\_\_\_\_  
Commissioner of Oaths for the Province  
of Québec



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- and -

**WESTON FOODS (CANADA) INC.**

Defendants

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<b>LIST OF EXHIBITS</b>	
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<b>Exhibit NGP-1:</b>	Copy of a decision rendered by Justice Donald Bisson, J.S.C. dated November 1, 2022
<b>Exhibit NGP-2:</b>	Originating application dated February 18, 2022 in the BC Beef Class Action in court file no. S-221365

<b>Exhibit NGP-3:</b>	Originating application dated March 25, 2020 in court file no. 500-06-000888-178
<b>Exhibit NGP-4:</b>	Decision dated December 31, 2021 rendered by Justice Morgan of the Ontario Superior Court of Justice bearing court file number CV-17-586063-00CP
<b>Exhibit NGP-5:</b>	Notice of Motion dated August 4, 2023 in court file number CV-17-586063-00CP
<b>Exhibit NGP-6:</b>	MLF's Annual Report to Shareholders as of December 31, 2022
<b>Exhibit NGP-7:</b>	Extract of Metro's website
<b>Exhibit NGP-8:</b>	Extract of Walmart Canada's website
<b>Exhibit NGP-9:</b>	Extract of Loblaw Companies Limited's website
<b>Exhibit NGP-10:</b>	Extract of Loblaw Inc.'s website
<b>Exhibit NGP-11:</b>	Extract of Weston Foods' website
<b>Exhibit NGP-12:</b>	Information found at <a href="https://essfeed.com/canadas-top-10-largest-meat-producers/">https://essfeed.com/canadas-top-10-largest-meat-producers/</a>
<b>Exhibit NGP-13:</b>	Email from Ms. Perkins dated March 22, 2007 in native format

MONTRÉAL, January 31, 2024

*Osler, Hoskin & Harcourt LLP*

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Our file: 1249156

## Ciciotti, Fabiola

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**Cc:** Préfontaine, Éric; Naudie, Chris; Hirsh, Adam; Montpetit, Quentin  
**Objet:** NOTIFICATION BY EMAIL: Elias Karras v. Maple Leaf Foods Inc. et al. - 500-06-001253-232 / Application by Defendant Maple Leaf Foods Inc. for leave to adduce relevant evidence, Sworn Statement of N. Grand'Pierre and Exhibits NGP-1 to NGP-13  
**Pièces jointes:** 2024-01-31 Application by Defendant Maple Leaf Foods Inc. for leave to adduce evidence and Sworn Statement of Nathalie Grand'Pierre.pdf

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	Naudie, Chris	Remis: 2024-01-31 15:31
	Hirsh, Adam	Remis: 2024-01-31 15:31
	Montpetit, Quentin	Remis: 2024-01-31 15:31

### NOTIFICATION BY EMAIL (Art. 134 CCP)

#### **SENDER**

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George Weston Limited, Weston Food Distribution Inc. and  
Weston Foods Inc

**Email:** [ADeZordo@blg.com](mailto:ADeZordo@blg.com) / [kchenevert@blg.com](mailto:kchenevert@blg.com)

**Place of transmission:** Montréal

**Date of transmission:** January 31, 2024

**Time of transmission:** See above

**Type of document:** **APPLICATION BY DEFENDANT MAPLE LEAF FOODS INC.  
FOR LEAVE TO ADDUCE RELEVANT EVIDENCE (Article 574  
C.C.P.), SWORN STATEMENT OF NATHALIE GRAND'PIERRE  
AND EXHIBITS NGP-1 TO NGP-13**  
[Exhibits NGP-1 to NGP-13](#)

**Court file number:** 500-06-001253-232

**Number of pages** 16 pages attached

**transmitted:**



**Fabiola Ciciotti**

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**Ciciotti, Fabiola**

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**De:** Microsoft Outlook  
**À:** jzukran@lpclex.com  
**Envoyé:** 31 janvier 2024 15:31  
**Objet:** Relayé : NOTIFICATION BY EMAIL: Elias Karras v. Maple Leaf Foods Inc. et al. - 500-06-001253-232 / Application by Defendant Maple Leaf Foods Inc. for leave to adduce relevant evidence, Sworn Statement of N. Grand'Pierre and Exhibits NGP-1 to NGP-13

**La remise à ces destinataires ou groupes est terminée, mais aucune notification de remise n'a été envoyée par le serveur de destination :**

[jkukran@lpclex.com \(jkukran@lpclex.com\)](mailto:jkukran@lpclex.com)

Objet : NOTIFICATION BY EMAIL: Elias Karras v. Maple Leaf Foods Inc. et al. - 500-06-001253-232 / Application by Defendant Maple Leaf Foods Inc. for leave to adduce relevant evidence, Sworn Statement of N. Grand'Pierre and Exhibits NGP-1 to NGP-13

**Ciciotti, Fabiola**

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**De:** Microsoft Outlook  
**À:** Rodrigo, Nick; 'flalani@dwpv.com'  
**Envoyé:** 31 janvier 2024 15:31  
**Objet:** Relayé : NOTIFICATION BY EMAIL: Elias Karras v. Maple Leaf Foods Inc. et al. - 500-06-001253-232 / Application by Defendant Maple Leaf Foods Inc. for leave to adduce relevant evidence, Sworn Statement of N. Grand'Pierre and Exhibits NGP-1 to NGP-13

**La remise à ces destinataires ou groupes est terminée, mais aucune notification de remise n'a été envoyée par le serveur de destination :**

[Rodrigo, Nick \(nrodrigo@dwpv.com\)](mailto:nrodrigo@dwpv.com)

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Objet : NOTIFICATION BY EMAIL: Elias Karras v. Maple Leaf Foods Inc. et al. - 500-06-001253-232 / Application by Defendant Maple Leaf Foods Inc. for leave to adduce relevant evidence, Sworn Statement of N. Grand'Pierre and Exhibits NGP-1 to NGP-13

**Ciciotti, Fabiola**

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**De:** Microsoft Outlook  
**À:** 'Alexandre De Zordo (adezordo@blg.com)'  
**Envoyé:** 31 janvier 2024 15:31  
**Objet:** Relayé : NOTIFICATION BY EMAIL: Elias Karras v. Maple Leaf Foods Inc. et al. - 500-06-001253-232 / Application by Defendant Maple Leaf Foods Inc. for leave to adduce relevant evidence, Sworn Statement of N. Grand'Pierre and Exhibits NGP-1 to NGP-13

**La remise à ces destinataires ou groupes est terminée, mais aucune notification de remise n'a été envoyée par le serveur de destination :**

['Alexandre De Zordo \(adezordo@blg.com\)'](mailto:adezordo@blg.com) (adezordo@blg.com)

Objet : NOTIFICATION BY EMAIL: Elias Karras v. Maple Leaf Foods Inc. et al. - 500-06-001253-232 / Application by Defendant Maple Leaf Foods Inc. for leave to adduce relevant evidence, Sworn Statement of N. Grand'Pierre and Exhibits NGP-1 to NGP-13

**Ciciotti, Fabiola**

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**De:** Microsoft Outlook  
**À:** KChenevert@blg.com  
**Envoyé:** 31 janvier 2024 15:32  
**Objet:** Relayé : NOTIFICATION BY EMAIL: Elias Karras v. Maple Leaf Foods Inc. et al. - 500-06-001253-232 / Application by Defendant Maple Leaf Foods Inc. for leave to adduce relevant evidence, Sworn Statement of N. Grand'Pierre and Exhibits NGP-1 to NGP-13

**La remise à ces destinataires ou groupes est terminée, mais aucune notification de remise n'a été envoyée par le serveur de destination :**

[KChenevert@blg.com \(KChenevert@blg.com\)](mailto:KChenevert@blg.com)

Objet : NOTIFICATION BY EMAIL: Elias Karras v. Maple Leaf Foods Inc. et al. - 500-06-001253-232 / Application by Defendant Maple Leaf Foods Inc. for leave to adduce relevant evidence, Sworn Statement of N. Grand'Pierre and Exhibits NGP-1 to NGP-13

**Ciciotti, Fabiola**

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**De:** postmaster@NETORG381961.onmicrosoft.com  
**À:** krenno@renvath.com  
**Envoyé:** 31 janvier 2024 15:31  
**Objet:** Remis : NOTIFICATION BY EMAIL: Elias Karras v. Maple Leaf Foods Inc. et al. - 500-06-001253-232 / Application by Defendant Maple Leaf Foods Inc. for leave to adduce relevant evidence, Sworn Statement of N. Grand'Pierre and Exhibits NGP-1 to NGP-13

**Votre message a été remis aux destinataires suivants :**

[krenno@renvath.com \(krenno@renvath.com\)](mailto:krenno@renvath.com)

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**Ciciotti, Fabiola**

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**De:** postmaster@NETORG381961.onmicrosoft.com  
**À:** mvathilakis@renvath.com  
**Envoyé:** 31 janvier 2024 15:32  
**Objet:** Remis : NOTIFICATION BY EMAIL: Elias Karras v. Maple Leaf Foods Inc. et al. - 500-06-001253-232 / Application by Defendant Maple Leaf Foods Inc. for leave to adduce relevant evidence, Sworn Statement of N. Grand'Pierre and Exhibits NGP-1 to NGP-13

**Votre message a été remis aux destinataires suivants :**

[mvathilakis@renvath.com](mailto:mvathilakis@renvath.com) ([mvathilakis@renvath.com](mailto:mvathilakis@renvath.com))

Objet : NOTIFICATION BY EMAIL: Elias Karras v. Maple Leaf Foods Inc. et al. - 500-06-001253-232 / Application by Defendant Maple Leaf Foods Inc. for leave to adduce relevant evidence, Sworn Statement of N. Grand'Pierre and Exhibits NGP-1 to NGP-13



No : 500-06-001253-232

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**(Class Action)**  
**SUPERIOR COURT**  
PROVINCE OF QUÉBEC  
DISTRICT OF MONTREAL

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**ELIAS KARRAS**

Applicant

v.

**MAPLE LEAF FOODS INC.**

-and-

**METRO INC.**

-and-

**WAL-MART CANADA CORP.**

-and-

**LOBLAW COMPANIES LIMITED**

-and-

**LOBLAWS INC.**

-and-

**GEORGE WESTON LIMITED**

-and-

**WESTON FOOD DISTRIBUTION INC.**

-and-

**WESTON FOODS (CANADA) INC.**

Defendants

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**APPLICATION BY DEFENDANT MAPLE LEAF FOODS  
INC. FOR LEAVE TO ADDUCE RELEVANT EVIDENCE,  
SWORN STATEMENT OF NATHALIE GRAND'PIERRE  
AND EXHIBITS NGP-1 TO NGP-13**

**(Article 574 C.C.P.)**

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**ORIGINAL**

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BO 0323

Our file : 1249156

Mes Éric Préfontaine / Christopher Naudie / Me Adam  
Hirsh / Me Quentin Montpetit

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