# PROVINCE OF QUÉBEC DISTRICT OF MONTRÉAL

# SUPERIOR COURT (Class Action Division)

N°: **500-06-001292-248** 

9085-4886 QUEBEC INC.

**Applicant** 

٧.

**CONTINENTAL TIRE CANADA, INC.** 

and

**CONTINENTAL AG** 

and

CONTINENTAL TIRE THE AMERICAS, LLC

and

MICHELIN NORT AMERICA (CANADA) INC.

and

**COMPAGNIE GÉNÉRALE DES** 

**ÉTABLISSEMENTS** 

and

MICHELIN NORTH AMERICA, INC.

and

**NOKIAN TYRES CANADA INC.** 

and

**NOKIAN TYRES PLC** 

and

**NOKIAN TYRES INC.** 

and

#### GOODYEAR CANADA INC.

and

THE GOODYEAR TIRE & RUBBER COMPANY

and

PIRELLI TIRE INC.

and

PIRELLI & C. S.P.A.

and

PIRELLI TIRE LLC

and

**BRIDGESTONE CANADA INC.** 

and

**BRIDGESTON CORPORATION** 

and

**BRIDGESTON AMERICAS, INC.** 

Defendants

#### ANSWER OF DEFENDANT NOKIAN TYRES CANADA INC.

### IN RESPONSE TO THE SUMMONS, THE DEFENDANT STATES THE FOLLOWING:

- 1. It is represented by the undersigned attorneys whose contact details appear below, under their signature;
- 2. It intends to contest the Applicant's Application to Authorize the Bringing of a Class Action & to Appoint the Applicant as a Representative Plaintiff and to cooperate in establishing with the Applicant the protocol that will govern the conduct of the proceedings;
- 3. It reserves all its rights, including the right to challenge the jurisdiction of this Court.

Montréal, March 26, 2024

**BLAKE, CASSELS & GRAYDON LLP** 

Attorneys for the Defendant Nokian Tires

Canada

(Court Code: BB-8098)

1 Place Ville-Marie, Suite 3000 Montréal, Québec H3B 4N8

M<sup>tre</sup> Simon J Seida

Email: simon.seida@blakes.com Telephone: 514-982-4103

M<sup>tre</sup> Philippe Dubois

Email: philippe.dubois@blakes.com

Telephone: 514-982-4290 Fax: 514-982-4099

Our reference: 65975-01

1376-3242-2667.1

N°: 500-06-001292-248

### **SUPERIOR COURT**

(Class Action Division) **DISTRICT OF MONTREAL** 

9085-4886 QUEBEC INC.

Applicant

٧.

**CONTINENTAL TIRE CANADA, INC ET AL.** 

Defendants

## ANSWER OF THE DEFENDANT NOKIAN TYRES CANADA INC.

#### **ORIGINAL**



M<sup>tre.</sup> Simon J. Seida
M<sup>tre.</sup> Philippe Dubois
BLAKE, CASSELS & GRAYDON LLP

Barristers & Solicitors

1 Place Ville Marie, Suite 3000 Montréal, Québec H3B 4N8 Tel. for M<sup>tre</sup> Seida : 514-982-4103 Tel. for M<sup>tre</sup> Dubois: 514-982-4290

Fax: 514-982-4099

Emails: simon.seida@blakes.com philippe.dubois@blakes.com

Our File: 65975-01