

CANADA  
PRONVINE OF QUEBEC  
DISTRICT OF MONTREAL

No: **500-06-001320-247**

**SUPERIOR COURT**  
(Class Actions)

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**ISABELLE GIARD**

Plaintiff

v.

**3M COMPANY**

-and-

**COMPAGNIE 3M CANADA**

-and-

**DUPONT DE NEMOURS, INC.**

-and-

**THE CHEMOURS COMPANY**

-and-

**DUPONT CANADA**

-and-

**LA COMPAGNIE CHEMOURS DU CANADA**

-and-

**JOHNSON CONTROLS INTERNATIONAL  
PUBLIC LIMITED COMPANY, INC.**

-and-

**TYCO FIRE PRODUCTS LP**

-and-

**BASF SE**

-and-

**BASF CORPORATION**

-and-

**BASF CANADA INC.**

-and-

**ARKEMA CANADA INC.**

-and-

**ARKEMA INC.**

-and-

**ARCHROMA CANADA, CORP.**

-and-

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**CHUBB FIRE & SECURITY CANADA  
CORPORATION**

-and-

**CHUBB FIRE LIMITED**

-and-

**UNITED TECHNOLOGIES CORPORATION**

-and-

**AMEREX CORPORATION**

-and-

**DYNAX CORPORATION**

-and-

**BUCKEYE FIRE EQUIPEMENT COMPANY**

-and-

**CORTEVA INC.**

-and-

**NATIONAL FOAM INC.**

Defendants

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**ANSWER OF DEFENDANT**

**BASF CANADA INC.**

(Article 145 C.C.P.)

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**FOLLOWING THE MODIFIED APPLICATION FOR AUTHORIZATION TO INSTITUTE A CLASS ACTION AND TO APPOINT THE PLAINTIFF AS CLASS REPRESENTATIVE, THE DEFENDANT BASF CANADA INC., DECLARES AS FOLLOWS:**

1. The Defendant is represented by **DLA PIPER (CANADA) LLP**, whose contact information is as follows :

**DLA PIPER (CANADA) LLP**  
1501, McGill College Avenue,  
Suite 1400  
Montréal, QC, H3A 3M8

**Me Tania Da Silva**  
[tania.dasilva@dlapiper.com](mailto:tania.dasilva@dlapiper.com)  
Telephone : (514) 392-8427  
Fax : (514) 392-8374

**Me Annie-Claude Authier**  
[annie-claude.authier@ca.dlapiper.com](mailto:annie-claude.authier@ca.dlapiper.com)  
Telephone : (514) 392-8448  
Fax: (514) 392-1999

2. Under all legal reserve of their rights, including all preliminary applications that may be applicable and, without limitation, their right to contest the Court's jurisdiction, the Defendant intends to contest the *Application for Authorization to Institute a Class Action and to Appoint the Plaintiff as Class Representative*.
3. The present Answer and any acceptance of service does not constitute in any way an acknowledgement or an acceptance of the Superior Court of Quebec's jurisdiction over the Defendant.

MONTREAL, October 25, 2024

*DLA Piper (Canada) LLP*

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**DLA PIPER (CANADA) LLP**

*Attorneys for Defendant BASF Canada Inc.*

1501, McGill College Avenue, Suite 1400  
Montréal, QC, H3A 3M8

**Me Tania Da Silva**

[taniasilva@dlapiper.com](mailto:taniasilva@dlapiper.com)

Telephone : (514) 392-8427

Fax : (514) 392-8374

**Me Annie-Claude Authier**

[annie-claude.authier@dlapiper.com](mailto:annie-claude.authier@dlapiper.com)

Telephone : 514.392.8448

Fax: 514.392.8390

Our Reference : 100308-00011

## Sicondolfi, Talia

**From:** Sicondolfi, Talia  
**Sent:** Friday, October 25, 2024 11:35 AM  
**To:** sjt@slatervecchio.com; adb@slatervecchio.com; acr@slatervecchio.com  
**Cc:** Da Silva, Tania; Authier, Annie-Claude  
**Subject:** NOTIFICATION - Isabelle Giard v. 3M Company et als. - Answer of Defedant BASF Canada Inc. - 500-06-001320-247  
**Attachments:** Answer of BASF Canada Inc.pdf

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|           | Da Silva, Tania       | Delivered: 10/25/2024 11:35 AM |
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| <b>Date:</b>                                                                                                                                       | October 25, 2024                                                                                                                                                       | <b>Time:</b>                                                                                                                                                                                             | See email header             |
| <b>From:</b>                                                                                                                                       |                                                                                                                                                                        |                                                                                                                                                                                                          |                              |
| <b>Name:</b>                                                                                                                                       | Me Tania Da Silva<br>Me Annie-Claude Authier                                                                                                                           | <b>Our File:</b>                                                                                                                                                                                         | 100308-00011                 |
| <b>Email:</b>                                                                                                                                      | <a href="mailto:taniasilva@dlapiper.com">taniasilva@dlapiper.com</a><br><a href="mailto:annie-claude.authier@ca.dlapiper.com">annie-claude.authier@ca.dlapiper.com</a> | <b>Direct Line:</b>                                                                                                                                                                                      | 514-392-8427<br>514 392-8448 |
| <b>To:</b>                                                                                                                                         |                                                                                                                                                                        |                                                                                                                                                                                                          |                              |
| SLATER VECCHIO<br><b>Me Saro Turner</b><br><b>Me Al Brix</b><br><b>Me Andrea Roulet</b><br>5352, blvd. Saint-Laurent<br>Montréal (Québec), H2T 1S1 |                                                                                                                                                                        | <a href="mailto:sjt@slatervecchio.com">sjt@slatervecchio.com</a><br><a href="mailto:adb@slatervecchio.com">adb@slatervecchio.com</a><br><a href="mailto:acr@slatervecchio.com">acr@slatervecchio.com</a> |                              |
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| Court Number:                                                                                                                                      | 500-06-001320-247                                                                                                                                                      |                                                                                                                                                                                                          |                              |
| Name of parties:                                                                                                                                   | ISABELLE GIARD<br>v.<br>3M COMPANY et als.<br>Plaintiff<br>Defendants                                                                                                  |                                                                                                                                                                                                          |                              |
| Nature of document:                                                                                                                                | ANSWER OF DEFENDANT<br>BASF CANADA INC.<br>(Article 145 C.C.P.)                                                                                                        |                                                                                                                                                                                                          |                              |
| Number of pages:                                                                                                                                   | 4 pages                                                                                                                                                                |                                                                                                                                                                                                          |                              |

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Regards,

**Talia Sicondolfi**

Legal Administrative Assistant

T [+1 514.392.8405](tel:+15143928405)

E [talia.sicondolfi@dlapiper.com](mailto:talia.sicondolfi@dlapiper.com)

## Siccondolfi, Talia

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**From:** Microsoft Outlook  
<MicrosoftExchange329e71ec88ae4615bbc36ab6ce41109e@ca.dlapiper.com>  
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NOTIFICATION -  
Isabelle Giard ...

**No. : 500-06-001320-247**

**SUPERIOR COURT**  
(Class Action)

District of Montreal

**ISABELLE GIARD**

Plaintiff

v.

**3M COMPANY ET ALS.**

Defendants

**ANSWER OF DEFENDANT**  
**BASF CANADA INC.**  
(Article 145 C.C.P.)

ORIGINAL

**DLA PIPER (CANADA) LLP** **O/R : 100308-00011**  
*Attorneys for Defendant BASF Canada Inc.*

1501, McGill College avenue, Suite 1400  
Montréal, QC , H3A 3M8

**Me Tania Da Silva**

[tania.dasilva@dlapiper.com](mailto:tania.dasilva@dlapiper.com)

Telephone : (514) 392-8427

Fax : (514) 392-8374

**Me Annie-Claude Authier**

[annie-claude.authier@dlapiper.com](mailto:annie-claude.authier@dlapiper.com)

Telephone : 514.392.8448

Fax: 514.392.8390

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