

CANADA

PROVINCE OF QUÉBEC
DISTRICT OF MONTRÉAL

SUPERIOR COURT
(Class Action Division)

NO: 500-06-001346-242

ÉDUARD LACERTE

Plaintiff

v.

SAMUEL BRUNEAU

and

MICHAEL FIZZELL

and

ANDREW LAPHAM

and

MARTIN PICARD

and

FRANCIS (FRANK) SÉGUIN

and

TIMOTHY TOKARSKY

Defendants

ANSWER

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

1. Michael Fizzell and Andrew Lapham (the “Defendants”) hereby respond to the Application for Authorization to Institute a Class Action and to Bring a Statutory Misrepresentation Claim Pursuant to Articles 574 ff., *C.C.P.* and Section 225.4 of the *Québec Securities Act*.
2. The Defendants are represented by Mtres Christopher Richter and Cristina Cosneanu from Torys Law Firm LLP, whose contact information is as follows:

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3. The Defendants reserve all their legal rights, including the right to contest the jurisdiction of the Court.

MONTREAL, December 30, 2024

(s) Torys Law Firm LLP

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Torys Law Firm LLP

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TORYS LAW FIRM LLP
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Permanent Code: BS-2554
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