

CANADA

PROVINCE OF QUEBEC
DISTRICT OF MONTREAL

N°: 500-06-001431-259

SUPERIOR COURT
(Class Action)

KIMBERLIE PHANOR

Applicant

v.

ROYAL CARIBBEAN CRUISES LTD.

**MERLIN ENTERTAINMENTS GROUP
FLORIDA LLC**

SEA WORLD LLC

UNITED PARKS & RESORTS INC.

Defendants

ANSWER OF DEFENDANT SEA WORLD LLC
(Article 147 C.C.P.)

**FOLLOWING THE APPLICATION FOR AUTHORIZATION TO INSTITUTE A CLASS ACTION
AND TO BE APPOINTED REPRESENTATIVE, THE DEFENDANT SEA WORLD LLC,
DECLARES AS FOLLOWS:**

1. The Defendant is represented by counsel, whose contact information is as follows :

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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 be appointed 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, December 12, 2025.

DLA Piper (Canada) LLP

DLA PIPER (CANADA) LLP

Attorneys for Defendant Sea World LLC.

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Our Reference : 119629-00001

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SUPERIOR COURT DISTRICT OF MONTREAL PROVINCE OF QUEBEC (Class Action)
KIMBERLIE PHANOR Applicant v. ROYAL CARIBBEAN CRUISES LTD. MERLIN ENTERTAINMENTS GROUP FLORIDA LLC SEA WORLD LLC UNITED PARKS & RESORTS INC. Defendants
ANSWER OF DEFENDANT SEA WORLD LLC (Article 147 C.C.P.)
ORIGINAL
Me Tania Da Silva Me Annie-Claude Authier <i>Attorneys for the Defendant Sea World LLC.</i> DLA PIPER (CANADA) LLP 1501, McGill College avenue, Suite 1400 Montréal, QC , H3A 3M8 Courriel: taniasilva@dlapiper.com annie-claude.authier@ca.dlapiper.com Telephone : (514) 392-8433 (TDS) (514) 392-8448 (ACA) Fax: (514) 392-8399 (514) 392-1999 O/R : 119629-00001  BH 0834