

CANADA  
PROVINCE OF QUÉBEC  
DISTRICT OF MONTREAL

SUPERIOR COURT  
(Class Action)

03  
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NO : 500-06-000755-153

EMMANUEL KNAFO

Petitioner

vs.

TOYOTA CANADA INC. ET AL.

Respondents

**APPEARANCE**

The undersigned attorneys hereby appear on behalf of Hyundai Auto Canada Corp. in the present instance under reserve of all legal objections.

Montreal, November 24, 2015

  
CLYDE & CO CANADA, S.E.N.C.R.L.  
Attorneys for Hyundai Motor America Inc.

IROITS DE GREFFE  
Gouvernement du Québec  
Palais Justice MONTREAL

0320438-0096-1339  
74,00  
2015-11-25

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No: 500-06-000755-153

SUPERIOR COURT  
(CLASS ACTION)  
DISTRICT OF MONTREAL

EMMANUEL KNAFO

Petitioner

vs.

TOYOTA CANADA INC. ET AL.

Respondents

APPEARANCE

ORIGINAL

**CLYDE&CO**

Mtre. Gabriel Archambault  
Clyde & Cie Canada S.E.N.C.R.L./  
Clyde & Co Canada LLP  
630 René-Lévesque Blvd. West, Suite 1700  
Montreal, Quebec H3B 1S6  
Tel: (514) 843-3777  
Fax: (514) 843-6110  
www.clydeco.ca

BN-0373

O/F : 1533918

CANADA  
PROVINCE OF QUEBEC  
DISTRICT OF MONTRÉAL

NO.: 500-06-000755-153

SUPERIOR COURT (Class Action)

4

EMMANUEL KNAFO

Petitioner

vs.

TOYOTA CANADA INC.  
-and-  
CALTY DESIGN RESEARCH, INC.  
-and-  
NISSAN CANADA INC.  
-and-  
NISSAN NORTH AMERICA, INC.  
-and-  
NISSAN DESIGN AMERICA INC.  
-and-  
HONDA CANADA INC.  
-and-  
HONDA R&D AMERICAS, INC.  
-and-  
FORD MOTOR COMPANY OF CANADA, LIMITED  
-and-  
FOR MOTOR COMPANY  
-and-  
FCA CANADA INC.  
-and-  
FCA US LLC  
-and-  
GENERAL MOTORS OF CANADA  
-and-  
GENERAL MOTORS CORPORATION  
-and-  
BMW CANADA INC. / BMW GROUP CANADA  
-and-  
BMW OF NORTH AMERICA, LLC  
-and-  
DESIGNWORKDS USA, INC.  
-and-  
VOLKSWAGEN GROUP CANADA INC.  
-and-  
VOLKSWAGEN GROUP OF AMERICA, INC.  
-and-  
BENTLEY MOTORS CANADA, LTD  
-and-  
BENTLEY MOTORS, INC.  
-and-  
MERCEDES-BENZ CANADA INC.  
-and-

MERCEDES-BENZ RESEARCH & DEVELOPMENT  
NORTH AMERICA, INC.

-and-

HYUNDAI AUTO CANADA CORP.

-and-

HYUNDAI CANADA INC.

-and-

HYUNDAI MOTOR AMERICA, INC.

-and-

KIA CANADA INC.

-and-

KIA MOTORS AMERICA, INC.

Respondents

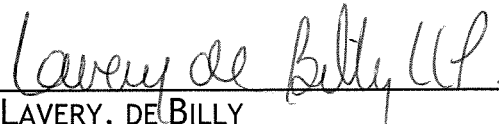
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APPEARANCE

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We hereby appear for the Respondent HONDA CANADA INC. in the present matter, under reserve of all rights, including the right to raise the absence of jurisdiction of this honourable Court.

Montréal, November 25, 2015



LAVERY, DE BILLY

LIMITED LIABILITY PARTNERSHIP

Attorneys for Respondent

Honda Canada inc.

NO.: 500-06-000755-153

SUPERIOR COURT  
DISTRICT OF MONTRÉAL

EMMANUEL KNAFO

Petitioner

vs.

TOYOTA CANADA INC.

-and-

HONDA CANADA INC.

-and-

HONDA R&D AMERICAS, INC.

-and-

AL.

Respondents

APPEARANCE

ORIGINAL

BL 1332

Me Luc Thibaudeau  
514-877-3044

O/f: 123509-00006

LAVERY, DE BILLY, L.L.P.

LIMITED LIABILITY PARTNERSHIP

SUITE 4000, 1, PLACE VILLE MARIE, MONTRÉAL, QUÉBEC H3B 4M4  
TELEPHONE: 514 871-1522 FAX NUMBER: 514 871-8977

lavery.ca

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CANADA  
PROVINCE OF QUEBEC  
DISTRICT OF MONTRÉAL

NO.: 500-06-000755-153

SUPERIOR COURT (Class Action)

EMMANUEL KNAFO

Petitioner

vs.

TOYOTA CANADA INC.

-and-

CALTY DESIGN RESEARCH, INC.

-and-

NISSAN CANADA INC.

-and-

NISSAN NORTH AMERICA, INC.

-and-

NISSAN DESIGN AMERICA INC.

-and-

HONDA CANADA INC.

-and-

HONDA R&D AMERICAS, INC.

-and-

FORD MOTOR COMPANY OF CANADA, LIMITED

-and-

FORD MOTOR COMPANY

-and-

FCA CANADA INC.

-and-

FCA US LLC

-and-

GENERAL MOTORS OF CANADA

-and-

GENERAL MOTORS CORPORATION

-and-

BMW CANADA INC. / BMW GROUP CANADA

-and-

BMW OF NORTH AMERICA, LLC

-and-

DESIGNWORKDS USA, INC.

-and-

VOLKSWAGEN GROUP CANADA INC.

-and-

VOLKSWAGEN GROUP OF AMERICA, INC.

-and-

BENTLEY MOTORS CANADA, LTD

-and-

BENTLEY MOTORS, INC.

-and-

MERCEDES-BENZ CANADA INC.

-and-

MERCEDES-BENZ RESEARCH & DEVELOPMENT  
NORTH AMERICA, INC.

-and-

HYUNDAI AUTO CANADA CORP.

-and-

HYUNDAI CANADA INC.

-and-

HYUNDAI MOTOR AMERICA, INC.

-and-

KIA CANADA INC.

-and-

KIA MOTORS AMERICA, INC.

Respondents

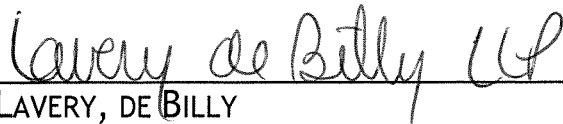
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APPEARANCE

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We hereby appear for the Respondent **HONDA R&D AMERICAS, INC.** in the present matter, under reserve of all rights, including the right to raise the absence of jurisdiction of this honourable Court.

Montréal, November 25, 2015



LAVERY, DE BILLY

LIMITED LIABILITY PARTNERSHIP

Attorneys for Respondent

Honda R&D Americas, inc.

203974

NO.: 500-06-000755-153

SUPERIOR COURT  
DISTRICT OF MONTRÉAL

EMMANUEL KNAFO

Petitioner

vs.

TOYOTA CANADA INC.

-and-

HONDA CANADA INC.

-and-

HONDA R&D AMERICAS, INC.

-and-

AL.

Respondents

APPEARANCE

ORIGINAL

BL 1332

Me Luc Thibaudeau  
514-877-3044

O/f: 123509-00006

LAVERY, DE BILLY, L.L.P.

LIMITED LIABILITY PARTNERSHIP

SUITE 4000, 1, PLACE VILLE MARIE, MONTRÉAL, QUÉBEC H3B 4M4  
TELEPHONE: 514 871-1522 FAX NUMBER: 514 871-8977

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CANADA

PROVINCE OF QUÉBEC  
DISTRICT OF MONTREAL

NO : 500-06-000755-153

SUPERIOR COURT  
(Class Action)

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EMMANUEL KNAFO

Petitioner

vs.

TOYOTA CANADA INC. ET AL.

Respondents

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**APPEARANCE**

The undersigned attorneys hereby appear on behalf of Hyundai Motor America Inc. in the present instance under reserve of all legal objections.

Montreal, November 27, 2015

  
\_\_\_\_\_  
**CLYDE & CO CANADA, S.E.N.C.R.L.**  
Attorneys for Hyundai Motor America Inc.

IMDITS DE GREFFE  
Gouvernement du Québec  
Palais Justice MONTREAL

0320662-0003-1250  
74,00  
2015-11-30

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No: 500-06-000755-153

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SUPERIOR COURT  
(CLASS ACTION)  
DISTRICT OF MONTREAL

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**EMMANUEL KNAFO**

Petitioner

vs.

**TOYOTA CANADA INC. ET AL.**

Respondents

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APPEARANCE

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ORIGINAL

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**CLYDE&CO**

**Mtre. Gabriel Archambault**  
Clyde & Cie Canada S.E.N.C.R.L./  
Clyde & Co Canada LLP  
630 René-Lévesque Blvd. West, Suite 1700  
Montreal, Quebec H3B 1S6  
Tel: (514) 843-3777  
Fax: (514) 843-6110  
[www.clydeco.ca](http://www.clydeco.ca)

BN-0373

O/F : 1533918

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CANADA  
PROVINCE OF QUÉBEC  
DISTRICT OF MONTREAL

Class Action  
SUPERIOR COURT

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No.: 500-06-000755-153

**EMMANUEL KNAFO**

Petitioner

-vs.-

**TOYOTA CANADA INC.**

-and-

**CALTY DESIGN RESEARCH, INC.**

-and-

**NISSAN CANADA INC.**

-and-

**NISSAN NORTH AMERICA, INC.**

-and-

**NISSAN DESIGN AMERICA INC.**

-and-

**HONDA CANADA INC.**

-and-

**HONDA R&D AMERICAS, INC.**

-and-

**FORD MOTOR COMPANY OF CANADA,  
LIMITED**

-and-

**FORD MOTOR COMPANY**

-and-

**FCA CANADA INC.**

-and-

**FCA US LLC**

-and-

**GENERAL MOTORS OF CANADA**

**LIMITED**

-and-

**GENERAL MOTORS CORPORATION**

-and-

**BMW CANADA INC. / MBW GROUP  
CANADA**

-and-

**BMW OF NORTH AMERICA, LLC**

-and-

**DESIGNWORKS USA, INC.**

-and-

**VOLKSWAGEN GROUP CANADA INC.**

-and-

**VOLKSWAGEN GROUP OF AMERICA**

-and-

**BENTLEY MOTORS CANADA, LTD.**

-and-

**BENTLEY MOTORS, INC.**

-and-

**MERCEDES-BENZ CANADA INC.**

-and-

**MERCEDES-BENZ RESEARCH &  
DEVELOPMENT NORTH AMERICA**

-and-

**HYUNDAI AUTO CANADA CORP.**

-and-

**HYUNDAI CANADA INC.**

-and-

**HYUNDAI MOTOR AMERICA, INC.**

-and-

**KIA CANADA INC.**

-and-

**KIA MOTORS AMERICA, INC.**

Respondents

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**APPEARANCE**

We, the undersigned attorneys, appear on behalf of Respondents **FORD MOTOR COMPANY OF CANADA, LIMITED** and **FORD MOTOR COMPANY** under reserve of all legal rights and objections including, without limitation, the improper/invalid service of the present proceedings and the lack of the Court's jurisdiction herein.

MONTREAL, November 27, 2015

*Blake, Cassels & Graydon LLP*

**BLAKE, CASSELS & GRAYDON LLP**  
Attorneys for FORD MOTOR COMPANY  
OF CANADA, LIMITED and FORD  
MOTOR COMPANY

TRUITS DE GREFFE  
Gouvernement du Québec  
Palais Justice MONTREAL

0320611-0029-1002  
74,00  
2015-11-30

27 NOV. 2015

N°: 500-06-000755-153

SUPERIOR COURT  
DISTRICT OF MONTREAL

EMMANUEL KNAFO

Petitioner

v.

TOYOTA CANADA INC. ET AL.

Respondents

**PRODURE  
TIMBRER**

APPEARANCE

ORIGINAL

M<sup>re</sup> Robert J. Torralbo

BLAKE, CASSELS & GRAYDON LLP

Barristers & Solicitors

1 Place Ville Marie

Suite 3000

Montréal, Québec H3B 4N8

Telephone: 514-982-4014

Fax: 514-982-4099

Email: robert.torralbo@blakes.com

Our File: 99997-99993

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*Blakes*

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PROVINCE OF QUÉBEC  
DISTRICT OF MONTREAL

NO.: 500-06-000755-153

SUPERIOR COURT  
(Class Action)

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**EMMANUEL KNAFO**

Petitioner

v

**TOYOTA CANADA INC.**

and

**CALTY DESIGN RESEARCH, INC.**

and

**NISSAN CANADA INC.**

and

**NISSAN NORTH AMERICA, INC.**

and

**NISSAN DESIGN AMERICA INC.**

and

**HONDA CANADA INC.**

and

**HONDA R&D AMERICAS, INC.**

and

**FORD MOTOR COMPANY OF CANADA, LIMITED**

and

**FORD MOTOR COMPANY**

and

**FCA CANADA INC.**

and

**FCA US LLC**

and

**GENERAL MOTORS OF CANADA LIMITED**

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and

**GENERAL MOTORS CORPORATION**

and

**BMW CANADA INC. / BMW GROUP CANADA**

and

**BMW OF NORTH AMERICA, LLC**

and

**DESIGNWORKS USA, INC.**

and

**VOLKSWAGEN GROUP CANADA INC.**

and

**VOLKSWAGEN GROUP OF AMERICA, INC.**

and

**BENTLEY MOTORS CANADA, LTD.**

and

**BENTLEY MOTORS, INC.**

and

**MERCEDES-BENZ CANADA INC.**

and

**MERCEDES-BENZ RESEARCH & DEVELOPMENT  
NORTH AMERICA, INC.**

and

**HYUNDAI AUTO CANADA CORP.**

and

**HYUNDAI CANADA INC.**

and

**HYUNDAI MOTOR AMERICA, INC.**

and



**KIA CANADA INC.**

and

**KIA MOTORS AMERICA, INC.**

Respondents

---

**APPEARANCE**

We appear on behalf of Respondents Mercedes-Benz Canada Inc. and Mercedes-Benz Research & Development North America, Inc. in the present case, under reserve of all rights and objections.

Montréal, November 30, 2015



**DENTONS CANADA LLP**

Attorneys for Respondents

Mercedes-Benz Canada Inc. and

Mercedes-Benz Research & Development North America Inc.

**No.** 500-06-000755-153

225805

SUPERIOR COURT  
(Class Action)  
DISTRICT OF MONTRÉAL

**EMMANUEL KNAFO**

**Petitioner**

v

**MERCEDES-BENZ CANADA INC. ET AL.**

**Respondents**

Me Laurent Nahmiash (556086-002)

**APPEARANCE FOR  
MERCEDES-BENZ CANADA INC. AND  
MERCEDES-BENZ RESEARCH & DEVELOPMENT  
NORTH AMERICA INC.**

ORIGINAL



**Dentons Canada LLP**  
1 Place Ville Marie, Suite 3900  
Montréal QC H3B 4M7  
Tel. : 514 878 8800  
Fax : 514 866 2241

dentons.com  
BB0822

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CANADA

SUPERIOR COURT  
(Class Action)

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PROVINCE OF QUEBEC  
DISTRICT OF MONTREAL

No: 500-06-000755-153

EMMANUEL KNAFO,

Petitioner

v.

TOYOTA CANADA INC. ET AL

Respondents


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APPEARANCE

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We hereby appear for Respondent GENERAL MOTORS OF CANADA COMPANY (formerly known as GENERAL MOTORS OF CANADA LIMITED) under reserve of all legal objections.

Montreal, December 2, 2015

  
**Borden Ladner Gervais LLP**  
Attorneys for GENERAL MOTORS OF  
CANADA COMPANY (formerly known  
as GENERAL MOTORS OF CANADA  
LIMITED)

REGISTRAR DE GREFFE  
Gouvernement du Québec  
Palais Justice MONTREAL

0320793-0054-1616  
74,00  
2015-12-02

SUPERIOR COURT  
(Class Actions)  
DISTRICT OF MONTRÉAL  
No.: 500-06-000755-153

EMMANUEL KNAFO,

Petitioner

v.

TOYOTA CANADA INC. ET AL

Respondents

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APPEARANCE

ORIGINAL

**BLG**  
Borden Ladner Gervais  
B.M. 2545  
1000 De La Gauchetière Street West  
Bureau / Suite 900  
Montréal, QC, Canada H3B 5H4  
Tel. 514.879.1212  
Fax : 514.954.1905  
rcharbonneau@big.com  
Mre Robert E. Charbonneau  
File : 004871-000521

CANADA

PROVINCE OF QUÉBEC  
DISTRICT OF MONTREAL  
LOCALITY: MONTREAL

SUPERIOR COURT (Class Action)

12  
/

No: 500-06-000755-153

EMMANUEL KNAFO

Petitioner

v.

TOYOTA CANADA INC.

and

BMW CANADA INC./BMW GROUP CANADA

Et al.

Respondents

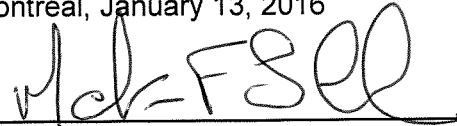
ANSWER

07014

1. I, Martin Sheehan, representative of Respondent BMW Canada Inc./BMW Group Canada, am answering this case so as to contest, and determine the protocol of the proceeding with the other parties, under reserve of any objection it may have as to the jurisdiction of this court as well as under reserve of all other rights and legal objections;
2. The Respondent BMW Canada Inc./BMW Group Canada is represented by counsel, whose contact information is:

**Me Martin Sheehan**  
**Fasken Martineau DuMoulin LLP**  
Suite 3700, P.O. Box 242  
800, Place Victoria  
Montréal (Québec) H4Z 1E9  
Direct : +1 514 397 4395  
Facsimile : +1 514 397 7600  
Email : msheehan@fasken.com

Montréal, January 13, 2016



Me Martin Sheehan  
**Fasken Martineau DuMoulin LLP**  
Attorneys for BMW Canada Inc./  
BMW Group Canada  
Stock Exchange Tower  
Suite 3700, P.O. Box 242  
800 Place Victoria  
Montréal, Quebec  
H4Z 1E9  
Phone number: +1 514 397 4395  
Fax number: +1 514 397 7600  
Email: msheehan@fasken.com

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Gouvernement du Québec  
Palais Justice MONTREAL

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N° : 500-06-000755-153  
PROVINCE OF QUÉBEC  
SUPERIOR COURT (CLASS ACTION)  
DISTRICT OF MONTREAL  
EMMANUEL KNAFO

Petitioner

v.

TOYOTA CANADA INC.

and

BMW CANADA INC./BMW GROUP CANADA

Et al.

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Respondents

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Answer  
(Class Action)

ORIGINAL

Fasken Martineau DuMoulin LLP

Stock Exchange Tower  
Suite 3700, P.O. Box 242  
800 Place Victoria  
Montréal, Quebec  
H4Z 1E9

Martin Sheehan  
msheehan@fasken.com

Tel. +1 514 397 4395  
Fax. +1 514 397 7600

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CANADA

PROVINCE OF QUÉBEC  
DISTRICT OF MONTREAL  
LOCALITY: MONTREAL

SUPERIOR COURT (Class Action)

No: 500-06-000755-153

EMMANUEL KNAFO  
Petitioner

v.

TOYOTA CANADA INC.

and

BMW CANADA INC./BMW GROUP CANADA

Et al.

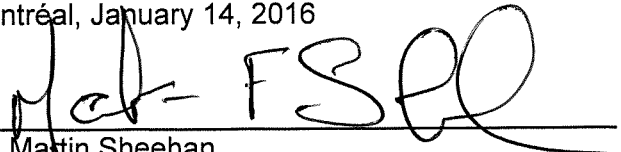
Respondents

**ANSWER**

1. I, Martin Sheehan, representative of Respondents BMW of North America, LLC and Designworks USA, Inc., am answering this case so as to contest, and determine the protocol of the proceeding with the other parties, under reserve of any objection it may have with regard to proper service, as to the jurisdiction of this court as well as under reserve of all other rights and legal objections;
2. The Respondent BMW of North America, LLC and Designworks USA, Inc., is represented by counsel, whose contact information is:

**Me Martin Sheehan**  
**Fasken Martineau DuMoulin LLP**  
 Suite 3700, P.O. Box 242  
 800, Place Victoria  
 Montréal (Québec) H4Z 1E9  
 Direct : +1 514 397 4395  
 Facsimile : +1 514 397 7600  
 Email : msheehan@fasken.com

Montréal, January 14, 2016



Me Martin Sheehan  
**Fasken Martineau DuMoulin LLP**  
 Attorneys for BMW Canada Inc./  
 BMW Group Canada/ BMW of North America, LLC and  
 Designworks USA, Inc.  
 Stock Exchange Tower  
 Suite 3700, P.O. Box 242  
 800 Place Victoria  
 Montréal, Quebec  
 H4Z 1E9  
 Phone number: +1 514 397 4395  
 Fax number: +1 514 397 7600  
 Email: msheehan@fasken.com

DROITS DE GREFFE  
 Gouvernement du Québec  
 Palais Justice MONTREAL

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N° : 500-06-000755-153  
PROVINCE OF QUÉBEC  
SUPERIOR COURT (CLASS ACTION)  
DISTRICT OF MONTREAL  
EMMANUEL KNAFO

Petitioner

v.

TOYOTA CANADA INC.

and

BMW CANADA INC./BMW GROUP CANADA

Et al.

P

Respondents

10813/268052.00060

BF1339

Answer of BMW of North America, LLC and  
Designworks USA, Inc.  
(Class Action)

ORIGINAL

Fasken Martineau DuMoulin LLP  
Stock Exchange Tower  
Suite 3700, P.O. Box 242  
800 Place Victoria  
Montréal, Quebec  
H4Z 1E9  
Martin Sheehan Tel. +1 514 397 4395  
msheehan@fasken.com Fax. +1 514 397 7600

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CANADA

PROVINCE OF QUÉBEC  
DISTRICT OF MONTREAL  
LOCALITY: MONTREAL

SUPERIOR COURT (Class Action)

No: 500-06-000755-153

**EMMANUEL KNAFO**  
Petitioner

v.

**TOYOTA CANADA INC.**  
et al.  
Respondents

**ANSWER**

1. I, Enrico Forlini, representative of Respondent FCA US LLC, am answering this case so as to defend the application, and establish the case protocol with the other parties, under reserve of any objection it may have with regard to proper service, as to the jurisdiction of this court as well as under reserve of all other rights and legal objections;
2. The Respondent, FCA US LLC, is represented by counsel, whose contact information is:

**Me Enrico Forlini**  
**Fasken Martineau DuMoulin LLP**  
 Suite 3700, P.O. Box 242  
 800, Place Victoria  
 Montréal (Québec) H4Z 1E9  
 Direct : +1 514 397 4328  
 Facsimile : +1 514 397 7600  
 Email : eforlini@fasken.com

Montréal, January 22, 2016

*Fasken martineau duMoulin*

**Me Enrico Forlini**  
**Fasken Martineau DuMoulin LLP**  
 Attorneys for FCA US LLC  
 Stock Exchange Tower  
 Suite 3700, P.O. Box 242  
 800 Place Victoria  
 Montréal, Quebec  
 H4Z 1E9  
 Phone number: +1 514 397 4328  
 Fax number: +1 514 397 7600  
 Email: eforlini@fasken.com

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N° : 500-06-000755-153  
PROVINCE OF QUÉBEC  
DISTRICT OF MONTRÉAL  
LOCALITY: MONTREAL

25 JAN. 2016

**EMMANUEL KNAFO**  
Petitioner

v.

**TOYOTA CANADA INC.**  
*et al.*  
Respondents

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ANSWER

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Fasken Martineau DuMoulin LLP  
Stock Exchange Tower  
Suite 3700, P.O. Box 242  
800 Place Victoria  
Montréal, Quebec  
H4Z 1E9

**Enrico Forlini**  
eforlini@fasken.com

Tel. +1 514 397 4328  
Fax. +1 514 397 7600

16 JAN 25 10:00

Justice Montreal

CANADA

PROVINCE OF QUÉBEC  
DISTRICT OF MONTREAL  
LOCALITY:MONTREAL

SUPERIOR COURT (Class Action)

No: 500-06-000755-153

EMMANUEL KNAFO  
Petitioner

v.

TOYOTA CANADA INC.  
and  
NISSAN CANADA INC.  
and  
NISSAN NORTH AMERICA, INC.  
and  
NISSAN DESIGN AMERICA INC.

Et al.

Respondents

**ANSWER**

1. I, André Durocher, representative of Respondents Nissan Canada Inc., Nissan North America, Inc. and Nissan Design America Inc., am answering this case so as to contest, and determine the protocol of the proceeding with the other parties, under reserve of any objection it may have with regard to proper service, as to the jurisdiction of this court as well as under reserve of all other rights and legal objections;
2. The Respondents Nissan Canada Inc., Nissan North America, Inc. and Nissan Design America Inc. are represented by counsel, whose contact information are:

**Me André Durocher**  
**Fasken Martineau DuMoulin LLP**  
**800 Square Victoria**  
**Suite 3700, P.O. Box 242**  
**Montreal (Quebec) H4Z 1E9**

**Direct : 514-397-7495**  
**Facsimile : 514-397-7600**  
**Email : adurocher@fasken.com**

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2016-01-20  
ROUTES DE GREFFE  
Gouvernement du Québec  
Palais de Justice MONTREAL

Montreal, January 19, 2016



Me André Durocher

**Fasken Martineau DuMoulin LLP**

Attorneys for Nissan Canada Inc., Nissan North  
America, Inc. and Nissan Design America Inc.

Stock Exchange Tower

800, Place Victoria

Suite 3700, P.O. Box 242

Montreal (Quebec) H4Z 1E9

Direct : 514-397-7495

Facsimile : 514-397-7600

Email : [adurocher@fasken.com](mailto:adurocher@fasken.com)

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N° : 500-06-000755-153  
PROVINCE OF QUEBEC  
SUPERIOR COURT  
DISTRICT OF MONTREAL

19 JAN, 2016

EMMANUEL KNAFO  
Petitioner

v.

TOYOTA CANADA INC.

P

Et al.

Respondents

DEF 3  
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Justice Montréal  
16 JAN 20 -9:41

10263/303003.00002

BF1339

ANSWER  
(Nissan Canada Inc., Nissan North America,  
Inc. and Nissan Design America Inc.)

ORIGINAL

**Fasken Martineau DuMoulin S.E.N.C.R.L., s.r.l.**  
Stock Exchange Tower  
Suite 3700, P.O. Box 242  
800 Square Victoria  
Montreal (Quebec)  
H4Z 1E9

**Me André Durocher**  
adurocher@fasken.com

Tel. +1 514 397 7495  
Fax. +1 514 397 7600

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RPN

CANADA

PROVINCE OF QUÉBEC  
DISTRICT OF MONTREAL  
LOCALITY: MONTREAL

No: 500-06-000755-153

SUPERIOR COURT (Class Action)

EMMANUEL KNAFO  
Petitioner

v.

TOYOTA CANADA INC.  
and  
KIA CANADA INC. DFO24

Et al.

Respondents

18

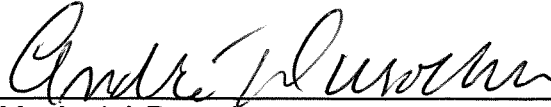
ANSWER

1. I, André Durocher, representative of Respondent Kia Canada Inc., am answering this case so as to contest, and determine the protocol of the proceeding with the other parties, under reserve of any objection it may have with regard to proper service, as to the jurisdiction of this court as well as under reserve of all other rights and legal objections;
2. The Respondent Kia Canada Inc. is represented by counsel, whose contact information are:

**Me André Durocher**  
**Fasken Martineau DuMoulin LLP**  
**800 Square Victoria**  
**Suite 3700, P.O. Box 242**  
**Montreal (Quebec) H4Z 1E9**

**Direct : 514-397-7495**  
**Facsimile : 514-397-7600**  
**Email : adurocher@fasken.com**

Montreal, July 19, 2016



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Me André Durocher

**Fasken Martineau DuMoulin LLP**

Attorneys for Kia Canada Inc.

Stock Exchange Tower

800, Place Victoria

Suite 3700, P.O. Box 242

Montreal (Quebec) H4Z 1E9

Direct : 514-397-7495

Facsimile : 514-397-7600

Email : [adurocher@fasken.com](mailto:adurocher@fasken.com)

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N° : 500-06-000755-153  
PROVINCE OF QUEBEC  
SUPERIOR COURT  
DISTRICT OF MONTREAL

20 JUL 2016

EMMANUEL KNAFO  
Petitioner

v.

P

TOYOTA CANADA INC.

Et al.

Respondents

20 JUL 2016

10263/202471.00075

BF1339

ANSWER  
(Kia Canada Inc.)

ORIGINAL

**Fasken Martineau DuMoulin S.E.N.C.R.L., s.r.l.**

Stock Exchange Tower  
Suite 3700, P.O. Box 242  
800 Square Victoria  
Montreal (Quebec)  
H4Z 1E9

**Me André Durocher**  
adurocher@fasken.com

Tel. +1 514 397 7495  
Fax. +1 514 397 7600