

19  
128

CANADA

PROVINCE OF QUÉBEC  
DISTRICT OF MONTRÉAL  
Locality: Montréal

SUPERIOR COURT  
(Class Action)

---

**NO: 500-06-000783-163**

**CELSO CATUCCI**

and

**NICOLE AUBIN**

Representative Plaintiffs

v.

**VALEANT PHARMACEUTICALS  
INTERNATIONAL INC.**

and

**J. MICHAEL PEARSON**

and

**HOWARD B. SCHILLER**

and

**ROBERT L. ROSIELLO**

and

**ROBERT A. INGRAM**

and

**ROBERT H. FARMER**

and

**THEO MELAS-KYRIAZI**

and

**G. MASON MORFIT**

and

**DR. LAURENCE PAUL**

and

**ROBERT N. POWER**

and

**NORMA A. PROVENCIO**

and

**LLOYD M. SEGAL**

and

**KATHARINE B. STEVENSON**

and

**FRED HASSAN**

and

**COLLEEN GOGGINS**

and

**ANDERS O. LONNER**

and

**JEFFREY W. UBBEN**

and

**PRICEWATERHOUSECOOPERS LLP**

and

**GOLDMAN, SACHS & CO.**

and

**GOLDMAN SACHS CANADA INC.**

and

**DEUTSCHE BANK SECURITIES INC.**

and

**BARCLAYS CAPITAL INC.**

and

**HSBC SECURITIES (USA) INC.**

and

**MITSUBISHI UFJ SECURITIES (USA) INC.**

and

**DNB MARKETS INC.**

and

**RBC CAPITAL MARKETS LLC**

and

**MORGAN STANLEY & CO. LLC**

and

**SUNTRUST ROBINSON HUMPHREY INC.**

and

**CITIGROUP GLOBAL MARKETS INC.**

and

**CIBC WORLD MARKETS CORP.**

and

**SMBC NIKKO SECURITIES AMERICA INC.**

and

**TD SECURITIES (USA) LLC**

and

**J.P. MORGAN SECURITIES LLC**

and

**MERRILL LYNCH, PIERCE, FENNER &  
SMITH INCORPORATED**

and

**BMO CAPITAL MARKETS CORP.**

Defendants

---

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

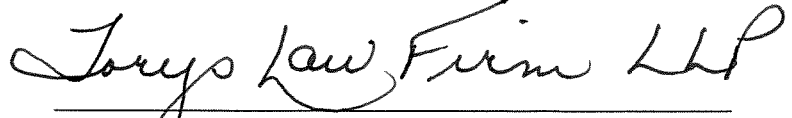
---

1. Goldman Sachs & Co.<sup>1</sup>, Goldman Sachs Canada Inc.<sup>2</sup>, Deutsche Bank Securities Inc.<sup>3</sup>, Barclays Capital Inc.<sup>4</sup>, HSBC Securities (USA) Inc.<sup>5</sup>, Mitsubishi UFJ Securities (USA) Inc.<sup>6</sup>, DNB Markets Inc.<sup>7</sup>, RBC Capital Markets LLC<sup>8</sup>, Morgan Stanley & Co. LLC<sup>9</sup>, Suntrust Robinson Humphrey Inc.<sup>10</sup>, Citigroup Global Markets Inc.<sup>11</sup>, CIBC World Markets Corp.<sup>12</sup>, SMBC Nikko Securities America Inc.<sup>13</sup>, TD Securities (USA) LLC,<sup>14</sup> J.P. Morgan Securities LLC,<sup>15</sup> Merrill Lynch,<sup>16</sup> Pierce, Fenner & Smith Incorporated<sup>17</sup> and BMO Capital Markets Corp.<sup>18</sup> (the "**Defendants**") intend to defend the application and establish a case protocol with counsel for the Plaintiffs;
2. The Defendants are represented by William McNamara, whose contact information is the following:

William McNamara  
**TORYS LAW FIRM LLP**  
1 Place Ville Marie, Suite 2880  
Montréal, Québec H3B 4R4  
Tel.: (514) 868-5622  
Fax: (514) 868-5700  
[wmcnamara@torys.com](mailto:wmcnamara@torys.com)

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

**MONTREAL**, this 21st day of April, 2016



William McNamara

[wmcnamara@torys.com](mailto:wmcnamara@torys.com)

**TORYS LAW FIRM LLP**

(BS-2554)

1 Place Ville Marie, Suite 2880

Montréal, Québec H3B 4R4

Tel.: (514) 868-5622

Fax: (514) 868-5700

Counsel for Defendants Goldman Sachs & Co.,  
Goldman Sachs Canada Inc., Deutsche Bank  
Securities Inc., Barclays Capital Inc., HSBC  
Securities (USA) Inc., Mitsubishi UFJ Securities  
(USA) Inc., DNB Markets Inc., RBC Capital Markets  
LLC, Morgan Stanley & Co. LLC, Suntrust Robinson  
Humphrey Inc., Citigroup Global Markets Inc., CIBC  
World Markets Corp., SMBC Nikko Securities  
America Inc., TD Securities (USA) LLC, J.P. Morgan  
Securities LLC, Merrill Lynch, Pierce, Fenner &  
Smith Incorporated and BMO Capital Markets Corp.  
Our File No.: 38724-2001

58483

22 AVR. 2016

Justice Montréal

22 AVR 2016 11:15

<b>NO : 500-06-000783-163</b>	
SUPERIOR COURT (Class Action) DISTRICT OF MONTRÉAL	
<b>CELSO CATUCCI et al.</b>	Representative Plaintiffs
v.	
<b>VALEANT PHARMACEUTICALS INTERNATIONAL INC. et al.</b>	Defendants
<b>ANSWER</b> (Art. 145(2) and 147 C.C.P.)	
<b>ORIGINAL</b>	
William McNamara <a href="mailto:wmcnamara@torys.com">wmcnamara@torys.com</a>	
<b>TORYS LAW FIRM LLP</b> 1, Place Ville-Marie, suite 2880 Montréal, Québec H3B 4R4 Telephone : 514.868.5622 Fax : 514.868.5700	
BS-2554	Our reference : 38724-2001

R PON }  
200 }  
DS

BS-2554

1686732.