

CANADA

PROVINCE OF QUÉBEC
DISTRICT OF MONTRÉAL

Locality: Montréal

NO.: 500-06-000783-163

SUPERIOR COURT
(Class Action)

96

CELSO CATUCCI
and
NICOLE AUBIN

5

Plaintiffs

v.

**VALEANT PHARMACEUTICALS
INTERNATIONAL INC.**

and

J. MICHAEL PEARSON

and

HOWARD B. SCHILLER

and

ROBERT L. ROSIELLO

and

ROBERT A. INGRAM

and

RONALD 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., 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. (the "**Defendants**") intend to defend the application and establish a case protocol with counsel for the Plaintiffs.

2. The Defendants are represented by Mtre. William McNamara and Mtre. Marie-Ève Gingras, whose contact information are the following:

Mtre. William McNamara
wmcnamara@torys.com
Tel.: 514.868-5622
Mtre. Marie-Ève Gingras
mgingras@torys.com
Tel.: 514.868-5607
TORYS LAW FIRM LLP
1 Place Ville Marie, Suite 2880
Montréal, Québec H3B 4R4
Fax: 514.868-5700
notifications-mtl@torys.com

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

MONTRÉAL, December 5, 2017

Torlys Law Firm LLP

TORYS LAW FIRM LLP

Attorneys 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)

DROITS DE GREFFE
Gouvernement du Québec
Palais Justice MONTREAL

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2017-12-06

LLC, J.P. Morgan Securities LLC, Merrill Lynch,
Pierce, Fenner & Smith Incorporated and BMO
Capital Markets Corp.

Mtre. William McNamara
wmcnamara@torys.com

Tel.: 514.868-5622

Mtre. Marie-Ève Gingras
mgingras@torys.com

Tel.: 514.868-5607

1 Place Ville Marie, Suite 2880

Montréal, Québec H3B 4R4

Fax: 514.868-5700

notifications-mtl@torys.com

Permanent Code: BS-2554

Our Reference: 38724-2001

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DISTRICT OF MONTREAL
Locality: Montréal

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Plaintiffs

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VALEANT PHARMACEUTICALS INTERNATIONAL
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Defendants

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

ORIGINAL

Mtre. William McNamara
wmcnamara@torys.com
Tel.: 514.868.5622
Mtre. Marie-Ève Gingras
mgingras@torys.com
Tel.: 514.868.5607

TORYS LAW FIRM LLP
1, Place Ville-Marie, suite 2880
Montréal, Québec H3B 4R4
Tel.: 514.868.5600
Fax: 514.868.5700
notifications-mtl@torys.com

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