

**CANADA**

**PROVINCE OF QUEBEC  
DISTRICT OF MONTRÉAL  
LOCALITY OF MONTRÉAL  
No: 500-06-000915-187**

**SUPERIOR COURT**

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**ZULLY LILIANA SALAZAR PASAJE**

Applicant

vs

**BMW CANADA INC.**

-and-

**BAYERISCHE MOTOREN WERKE AG,**

-and-

**BMW OF NORTH AMERICA, LLC,**

-and-

**BMW MANUFACTURING CO., LLC,**

Defendants

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**ANSWER**

(art. 147 C.C.P.)

IN ANSWER TO THE APPLICATION TO AUTHORIZE THE BRINGING OF A CLASS ACTION, THE DEFENDANT BMW OF NORTH AMERICA, LLC. STATES THE FOLLOWING:

1. BMW OF NORTH AMERICA, LLC. intends to contest the Application to Authorize the Bringing of a Class Action of the Applicant and to cooperate with it in preparing the case protocol that is to govern the conduct of the proceedings;
2. BMW OF NORTH AMERICA, LLC. is represented by Mtre Martin F. Sheehan and Mtre Noah Boudreau whose contact information are the following:

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3. BMW OF NORTH AMERICA, LLC. reserves all of its rights, including the right to contest this Court's jurisdiction.

Montréal, this April 23, 2018

*Fasken Martineau DuMoulin LLP*

**Fasken Martineau DuMoulin LLP**

Attorneys for

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N° : 500-06-000915-187

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PROVINCE OF QUEBEC  
SUPERIOR COURT  
(CLASS ACTION)  
DISTRICT OF MONTRÉAL  
LOCALITY OF MONTRÉAL

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-and

BMW MANUFACTURING CO., LLC,

Defendants

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ANSWER  
(art. 147 C.C.P)

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ORIGINAL

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