

C A N A D A

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

SUPERIOR COURT

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

ANSWER

(art. 147 C.C.P.)

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

1. BMW MANUFACTURING CO., 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 MANUFACTURING CO., LLC. is represented by Mtre Martin F. Sheehan and Mtre Noah Boudreau whose contact information are the following:

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

Montréal, this May 8, 2018

Fasken Martineau DuMoulin LLP

Fasken Martineau DuMoulin LLP

Attorneys for

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ANSWER
(art. 147 C.C.P)

ORIGINAL

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