SUPERIOR COURT (Class Action)

CANADA
PROVINCE OF QUEBEC
DISTRICT OF MONTREAL

No.: 500-06-000910-188

JENNIFER BALABANIAN

Plaintiff

VS

PAYPAL CANADA CO.

-and-

PAYPAL CA LIMITED

-and-

PAYPAL HOLDINGS INC.

Defendants

ANSWER

We hereby represent the Defendants, PayPal Canada Co., PayPal Ca Limited and PayPal Holdings Inc., and we are answering this case so as to contest Petitioner's Application to authorize the bringing of a class action and to appoint the status of representative plaintiff and to determine the modalities of case management with the Court and the other parties.

This answer does not constitute an acceptance by the Defendants to attorn to the jurisdiction of the Quebec courts and is filed without prejudice to the Defendants' right to contest the jurisdiction of the Quebec Superior Court.

This answer is filed under reserve of the Defendants' right to invoke any argument regarding the identification of the parties and does not constitute an admission that proper parties have been named in this proceeding.

MONTRÉAL, on April 23, 2018

MCCARTHY TETRAULT LLP

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File reference: 220257-505380

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JENNIFER BALABANIAN

Plaintiff

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PAYPAL CANADA CO.
-andPAYPAL CA LIMITED
-andPAYPAL HOLDINGS INC.

Defendants

ANSWER

ORIGINAL

Mtre Geneviève St-Cyr Larkin/vd / 220257-505380

BC0847

McCarthy Tétrault LLP

Avocats • Agents de brevets et marques de commerce Barristers & Solicitors • Patent & Trade-mark Agents

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