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**C A N A D A**

**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 BAYERISCHE MOTOREN WERKE AG STATES THE FOLLOWING:

1. BAYERISCHE MOTOREN WERKE AG. 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. BAYERISCHE MOTOREN WERKE AG is represented by Mtre Martin F. Sheehan and Mtre Noah Boudreau whose contact information are the following:

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3. BAYERISCHE MOTOREN WERKE AG reserves all of its rights, including the right to contest this Court's jurisdiction.

Montréal, this June 7, 2018

*Fasken Martineau DuMoulin*

**Fasken Martineau DuMoulin LLP**

Attorneys for Bayerische Motoren Werke AG

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N° : 500-06-000915-187

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

ZULLY LILIANA SALAZAR PASAJE

Applicant

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BMW CANADA INC.

-and-

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-and-

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BMW MANUFACTURING CO., LLC

Defendants

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ANSWER  
(art. 147 C.C.P.)

ORIGINAL

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