#### CANADA

### PROVINCE OF QUÉBEC DISTRICT OF MONTREAL

No: 500-06-000984-191

## SUPERIOR COURT (Class Action Chambers)

#### DANIELLE DALLAIRE

Applicant

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NISHIKAWA RUBBER CO., LTD. NISHIKAWA OF AMERICA, INC. NISHIKAWA COOPER LLC and COOPER-STANDARD HOLDINGS INC. COOPER-STANDARD AUTOMOTIVE INC. and AUTOMOTIVE COOPER-STANDARD CANADA LIMITED and TOYODA GOSEI CO., LTD. TOYODA GOSEI NORTH AMERICA CORPORATION and WATERVILLE TG INC. TOKAI KOGYO CO., LTD.

GREEN TOKAI CO., LTD.

**Defendants** 

# ANSWER TO THE APPLICATION (Articles 145 al. 2 and 147 CCP)

1. The defendants, NISHIKAWA OF AMERICA, INC. and NISHIKAWA COOPER LLC, by their undersigned attorneys, respond to the Application for Authorization to Institute a Class Action and to Obtain the Status of Representative, and indicate their intention to contest the application, under reserve of all their legal rights, including their right to raise the absence of jurisdiction of the Québec Superior Court and to seek the summary dismissal of the

### application;

2. The defendants are represented by the undersigned attorneys whose contact details appear below, under the signature.

MONTREAL, May 21, 2019

Mtre. Caroline Biron

Mtre. Bogdan-Alexandru Dobrota

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Nishikawa Cooper LLC

Notre référence : 5936-1 BW0208

500-06-000984-191 No.:

DISTRICT OF MONTREAL PROVINCE OF QUÉBEC (Class Action Chambers) SUPERIOR COURT

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NISHIKAWA RUBBER CO., LTD. ET AL.

Defendants

(Articles 145 al. 2 and 147 CCP) ANSWER TO THE APPLICATION

ORIGINAL

Mtre. Caroline Biron Mtre. Bogdan-Alexandru Dobrota Filc No.: 5936-1

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