

C A N A D A

(Class Action)

PROVINCE OF QUEBEC  
DISTRICT OF MONTRÉAL  
LOCALITY OF MONTRÉAL

SUPERIOR COURT

---

No: 500-06-001100-201

**EMIL FLOREA**

and

**JEFFERY HALL**

Petitioners

v.

**FCA US LLC**

and

**FIAT CHRYSLER AUTOMOBILES N.V.**

and

**FCA CANADA INC.**

Respondents

---

**ANSWER**

(art. 147 C.C.P.)

IN ANSWER TO THE APPLICATION FOR AUTHORIZATION TO EXERCISE A CLASS ACTION AND TO BE APPOINTED AS REPRESENTATIVE PLAINTIFF, THE RESPONDENTS FCA US LLC AND FCA CANADA INC. STATE THE FOLLOWING:

1. The Respondents FCA US LLC and FCA Canada Inc. (collectively the **“Respondents”**) intend to contest the *Application for Authorization to Exercise a Class Action and to be Appointed as Representative Plaintiff* and to cooperate with the Petitioners in preparing the case protocol that is to govern the conduct of the proceedings;
2. The Respondents are represented by Me Noah Boudreau, Me Mirna Kaddis and Peter J. Pliszka, whose contact information is the following:

**Me Noah Boudreau**

Email: [nboudreau@fasken.com](mailto:nboudreau@fasken.com)

Phone: +1 514 394 4521

**Me Mirna Kaddis**

Email: [mkaddis@fsken.com](mailto:mkaddis@fsken.com)

Phone: +1 514 397 7484

**Peter J. Pliszka**

Email: [ppliszka@fasken.com](mailto:ppliszka@fasken.com)

Phone: +1 416 868 3336

3. The Respondents reserve all of their rights, including the right to contest this Court's jurisdiction.

Montréal, this December 8, 2020

*Fasken Martineau DuMoulin LLP*

**Fasken Martineau DuMoulin LLP**

Attorneys for Respondents FCA US LLC and  
FCA Canada Inc.

800 Victoria Square, Suite 3500

P.O. Box 242

Montréal, Quebec H4Z 1E9

Fax number: +1 514 397 7600

**Me Noah Boudreau**

Phone number: +1 514 394 4521

Email: [nboudreau@fasken.com](mailto:nboudreau@fasken.com)

**Me Mirna Kaddis**

Phone number: +1 514 397 7484

Email: [mkaddis@fasken.com](mailto:mkaddis@fasken.com)

**Peter J. Pliszka**

Phone number: +1 416 868 3336

Email: [ppliszka@fasken.com](mailto:ppliszka@fasken.com)

N° : 500-06-001100-201

---

PROVINCE OF QUEBEC  
SUPERIOR COURT  
DISTRICT OF MONTRÉAL  
LOCALITY OF MONTRÉAL

---

**EMIL FLOREA**

**JEFFERY HALL**

Petitioners

v.

**FCA US LLC**

**FIAT CHRYSLER AUTOMOBILES N.V.**

**FCA CANADA INC.**

Respondents  
16989/227690.00227

BF1339

---

**ANSWER**  
(Art. 147 C.p.c.)  
(Class Action)

---

ORIGINAL

---

**Fasken Martineau DuMoulin LLP**  
800 Victoria Square, Suite 3500  
P.O. Box 242  
Montréal, Quebec H4Z 1E9

**Me Noah Boudreau**  
nboudreau@fasken.com

Tél. +1 514 394 4521  
Fax. +1 514 397 7600

**Me Mirna Kaddis**  
mkaddis@fsken.com

Tél. +1 514 397 7484  
Fax. +1 514 397 7600