

C A N A D A
PROVINCE OF QUÉBEC
DISTRICT OF MONTRÉAL

No.: 500-06-001124-219

**SUPERIOR COURT
(Class Action Chamber)**

JEAN NOËL,

Plaintiff

v.

**OTTO FUCHS BETEILIGUNGEN KG (aka OTTO
FUCHS – Kommanditgesellschaft)**

LEIBER GROUP GmbH & CO. KG

STROJMETAL ALUMINIUM FORGING GmbH

BHARAT FORGE ALUMINIUMTECHNIK GmbH

PRESSWERK KREFELD GmbH & CO. KG

HIRSCHVOGEL ALUMINIUM GmbH

Defendants

**ANSWER
(Articles 145, para. 2 and 147 C.C.P.)**

We, the undersigned, **NORTON ROSE FULBRIGHT CANADA LLP**, attorneys for the Defendant **BHARAT FORGE ALUMINIUMTECHNIK GMBH**, hereby answer the Summons of the Plaintiff by contesting the *Application for authorization to institute a Class Action and to obtain the status of representative Plaintiff* and by cooperating in establishing with the Plaintiff a Protocol that will govern the conduct of the proceedings.

The Defendant **BHARAT FORGE ALUMINIUMTECHNIK GMBH** reserves all of its rights, including the right to contest the jurisdiction of this Court.

Montréal, June 11, 2021



NORTON ROSE FULBRIGHT CANADA LLP

(Mtre. Eric C. Lefebvre)

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Defendants

**ANSWER
(Articles 145, para. 2 and 147 C.C.P.)**

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