

CANADA
PROVINCE OF QUÉBEC
DISTRICT OF MONTRÉAL

SUPERIOR COURT
(Class Actions)

No.: 500-06-001117-213

FRANÇOIS DÉCARY-GILARDEAU

Plaintiff

v.

GENERAL MOTORS OF CANADA
COMPANY

and

GENERAL MOTORS COMPANY

and

GENERAL MOTORS LLC

Defendants

**NOTICE OF DISCLOSURE OF THE DEFENDANTS' REQUEST FOR
PARTICULARS**
(Art. 166, 169 al. 2 C.C.P.)

To : **Me James Reza Nazem**
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Montreal, Quebec, H3B 2N2
Tel: 514.392.0000

Lawyer for the Plaintiff, François Décary-Gilardeau

BE ADVISED that this *Notice of Disclosure of the Defendants' Request for Particulars* will be presented for hearing and adjudication before the Honorable Shaun E. Finn of the Superior Court, at a date and time to be determined by the Court.

Indeed, the *Demande introductive d'instance* contains vague and ambiguous allegations, namely:

1. At paragraph 18, the Plaintiff alleges that "[...] *[I]es membres qui ont acheté une Bolt neuf (sic) auprès d'un concessionnaire GM, ont reçu un pamphlet et des*

explications du personnel du concessionnaire indiquant l'autonomie de la Bolt;", without:

- (a) Disclosing, communicating, or otherwise identifying the "pamphlet" to which this allegation refers, and
 - (b) Detailing the exact content of the "pamphlet" to which this allegation refers.
2. The Defendants hereby request said "pamphlet" to be communicated or identified.
3. At paragraph 60, the Plaintiff contends that "*[l]a limite de l'état de charge et la capacité de la batterie a également eu un impact sur la puissance d'accélération des Bott EV et EUV puisque la capacité d'accélération est plus élevée lorsque la batterie est à sa pleine capacité. Par conséquent, les membres du groupe étaient privés de la pleine capacité d'accélération de leurs Bolt;*", without specifying:
 - (a) The extent of the alleged acceleration reduction, if any;
 - (b) The basis of this allegation, including the technical justification(s) tying the acceleration reduction to the range limitations, if any, and
 - (c) The concrete impact of the alleged acceleration reduction on the class members, if any.
4. The Defendants hereby request any available technical justification to be communicated.
5. At paragraph 61, the Plaintiff contends that "*[l]e demandeur et les membres du groupe se sont aussi retrouvés avec des véhicules qui avaient perdu de façon accélérée leurs valeurs de revente;*", without specifying:
 - (a) The extent of the alleged loss of resale value, if any;
 - (b) The variation of the alleged loss of resale value depending on the models and model years of the vehicles targeted in the present class action, if any, and
 - (c) The justificatory documents or evidence substantiating this allegation, if any.
6. The Defendants hereby request any available justificatory documents to be provided.

FOR THESE REASONS, MAY IT PLEASE THE COURT:

- A. **ORDER** Plaintiff to communicate the particulars requested with respect to paragraphs 18, 60 and 61 of the *Demande introductive d'instance* and the corresponding document(s), within ten (10) days of the judgment to be rendered;

B. THE WHOLE without legal costs.

PLEASE GOVERN YOURSELVES ACCORDINGLY.

Montréal, June 16, 2025



Borden Ladner Gervais LLP

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