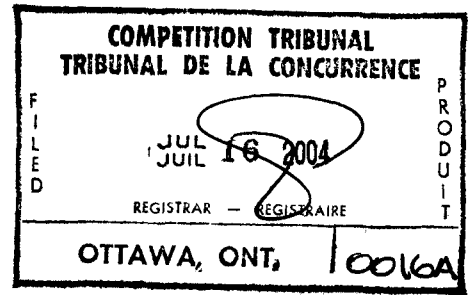


**THE COMPETITION TRIBUNAL**  
File No. CT-2003-009  
Registry Document No. ~~00000~~



B E T W E E N:

**ALLAN MORGAN AND SONS LTD.**

*Applicant*

- and -

**LA-Z-BOY CANADA LIMITED**

*Respondent*

**RESPONSE TO AN APPLICATION PURSUANT  
TO SECTION 75 OF THE *COMPETITION ACT***

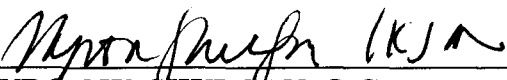
1. The Respondent opposes the Application of Allan Morgan & Sons Ltd. for an Order under section 75 of the *Competition Act*, R.S. 1985, c.19 (2<sup>nd</sup> supp) as amended (“Act”).
2. The Respondent substantially agrees with the facts contained in paragraphs 2, 4, 9, 24, 25 and 26 of the Applicant’s Statement of Grounds and Material Facts.
3. The Respondent disagrees with the facts alleged in paragraphs 3, 6, 7, 8, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 27, 28 and 29 of the Applicant’s Statement of Grounds and Material Facts.
4. The Respondent has no knowledge of the allegations contained in paragraphs 1 and 5 of the Applicant’s Statement of Grounds and Material Facts.

5. The Respondent will rely on the Statement of Grounds and Material Facts attached hereto and the Affidavit of Mark Wiltshire, duly sworn before a Barrister of the Province of Ontario on December 30, 2003 and previously filed with the Competition Tribunal.

6. The Respondent requests that the Application proceed in English.

7. The Respondent requests that the documents be filed in paper form.

Dated at Windsor, in the Province of Ontario, this 15 day of July, 2004.

  
\_\_\_\_\_  
**MYRON W. SHULGAN, Q.C.**  
**WILSON WALKER LLP**  
Barristers and Solicitors  
P.O. Box 1390  
300-443 Ouellette Avenue  
Windsor, Ontario  
N9A 6R4  
Telephone: (519) 977-1555  
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(LSUC # 13823F-1B)

*Solicitors for the Respondent*

**To: Deborah L.J. Hutchings**  
**McInnes Cooper**  
5<sup>th</sup> Floor, Baine Johnston Centre  
10 Fort William Place  
P.O. Box 5939  
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(709) 722-8254  
(709) 722-1763 Fax

*Solicitors for the Applicant*

**To: The Registrar**  
**The Competition Tribunal**  
The Thomas D'Arcy McGee Building  
600-90 Sparks Street  
Ottawa, Ontario K1P 5B4  
(613) 957-7851  
(613) 952-1123 Fax

**To: Allan Morgan and Sons Ltd.**  
Birch Hills, Bay Roberts, Nfld.  
P.O. Box 430  
Clarke's Beach, Nfld. A0A 1W0  
(709) 786-2100  
(709) 786-6403 Fax

ALLAN MORGAN AND SONS LTD.

v

LA-Z-BOY CANADA LIMITED

Court File No.: CT-2003-009

**THE COMPETITION TRIBUNAL**

**RESPONSE TO AN APPLICATION PURSUANT TO  
SECTION 75 OF THE *COMPETITION ACT***

**MYRON W. SHULGAN, Q.C.  
KRISTINA SAVI-MASCARO  
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**LSUC: 13823F-1B**

**LSUC: 46513-D**

Solicitors for the Appellant (Respondent)  
File #120055-16 /saf