

Court File No.: CV-25-00034752-00CP

**ONTARIO**  
**SUPERIOR COURT OF JUSTICE**

B E T W E E N :

*(Court Seal)*

VASILE PAVLIOGLU and ABRAM BRAUN

Plaintiffs

- and -

FINANCEIT CANADA INC.

Defendant

Proceeding under the *Class Proceedings Act, 1992*

**REPLY**

1. The plaintiffs deny the allegations contained in the Statement of Defence except as expressly stated herein.

**Consumer Protection Legislation Governs the Consumer Agreements**

2. Contrary to the defendant's allegations in paragraphs 50-52 of the Statement of Defence, corporate documents and testimony of the defendant itself tendered in this litigation concede the application of consumer protection legislation to the Consumer Agreements.
3. The defendant is estopped from denying the application of the *Consumer Protection Act* and Equivalent Consumer Protection Legislation.

## **FinanceIt's Failure to Disclose Material Information**

4. The defendant has refused to disclose or produce for inspection information and documentation on its dealings with its Dealers, despite the plaintiffs' requests and questions.
  
5. The plaintiffs reserve their rights to amend their pleadings at any time in the course of this proceeding once in possession of this information.

December 22, 2025

**SOTOS LLP**  
55 University Ave  
Suite 600  
Toronto ON M5J 2H7

**David Sterns (LSO# 36274J)**

[dsterns@sotos.ca](mailto:dsterns@sotos.ca)

**Mohsen Seddigh (LSO#70744I)**

[mseddigh@sotos.ca](mailto:mseddigh@sotos.ca)

**Maria Arabella Robles (LSO# 87381F)**

[mrobles@sotos.ca](mailto:mrobles@sotos.ca)

Tel: 416-977-0007

Fax: 416-977-0717

**ADVOCACY CENTRE FOR THE  
ELDERLY**

55 University Ave

Suite 1500

Toronto ON M5J 2H7

**Bethanie Pascutto (LSO# 78098F)**

[bethanie.pascutto@ace.clcj.ca](mailto:bethanie.pascutto@ace.clcj.ca)

Tel: 416-598-2656 x 1227

Fax: 416-598-7924

**FOREMAN & COMPANY  
PROFESSIONAL CORPORATION**  
4 Covent Market Place  
London, ON N6A 1E2

**Jonathan J. Foreman (LSO#: 45087H)**  
[jforeman@foremancompany.com](mailto:jforeman@foremancompany.com)  
**Jean-Marc Metrailler (LSO#: 69848F)**  
[jmetrailler@foremancopmany.com](mailto:jmetrailler@foremancopmany.com)  
**Anne Legate-Wolfe (LSO#: 76832J)**  
[alegatewolfe@foremancompany.com](mailto:alegatewolfe@foremancompany.com)

Tel: (519) 914.1175  
Fax: (519) 884.5340

Lawyers for the Plaintiffs

**PAVLIOGLU et al.**  
**Plaintiffs**

-and-

**FINANCEIT CANADA INC.**  
**Defendant**

**Court File No. CV-25-00034752-00CP**

---

***ONTARIO***  
**SUPERIOR COURT OF JUSTICE**

Proceeding commenced at Windsor

Proceeding under the *Class Proceedings Act, 1992*

---

**REPLY**

---

**SOTOS LLP**  
55 University Ave  
Suite 600  
Toronto ON M5J 2H7

**ADVOCACY CENTRE FOR THE ELDERLY**  
55 University Ave  
Suite 1500  
Toronto ON M5J 2H7

**FOREMAN & COMPANY**  
**PROFESSIONAL CORPORATION**  
4 Covent Market Place  
London, ON N6A 1E2

Lawyers for the Plaintiffs