

Court File No. CV-25-00034796-00CP

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

B E T W E E N:

DIANNE LEONA QUINN

Plaintiff

and

VAULT HOME CREDIT CORPORATION and JOHN DOE.

Defendant

Proceeding under the *Class Proceedings Act, 1992*

**REPLY**

1. The plaintiff denies 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 36-38 of the Statement of Defence that Vault is not "suppliers" and that the Consumer Agreements are not "credit agreements", corporate documents and testimony of the defendant itself tendered in this litigation concede such 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.
4. The defendant has refused to disclose information on the defendant's arrangements with its Dealers although asked in this litigation. The plaintiff reserves her right to amend her pleadings once in possession of such information.

December 22, 2025

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**Plaintiff**

-and-

**VAULT HOME CREDIT CORPORATION at al.**  
**Defendants**

**Court File No. CV-25-00034796-00CP**

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

Proceeding commenced at Windsor

Proceeding under the *Class Proceedings Act, 1992*

**REPLY**

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