

CANADA

PROVINCE OF QUEBEC
DISTRICT OF QUEBEC

N°: 200-06-000274-251

SUPERIOR COURT
(Class Action)

PATRICK BENOIT

Plaintiff

v.

**INTEGRATED DECISIONS AND SYSTEMS
INC.**

-and-

SAS INSTITUTE (CANADA) INC.

-and-

SAS INSTITUTE INC.

-and-

ACCOR MANAGEMENT CANADA INC.

-and-

CHOICE HOTELS INTERNATIONAL INC.

-and-

**CHOICE HOTELS CANADA INC. / LES
HÔTELS DE CHOIX DU CANADA INC.**

-and-

**FOUR SEASONS HOTELS LIMITED /
HOTELS QUATRE SAISONS LIMITEE**

-and-

HILTON WORLDWIDE HOLDINGS INC.

-and-

HILTON CANADA CO.

-and-

**HILTON INTERNATIONAL CANADA CRA
ULC**

-and-

HYATT HOTELS CORP.

-and-

HYATT PROPERTY MANAGEMENT INC.

-and-

**HYATT HOTELS OF CANADA INC. / HYATT
HÔTELS DU CANADA**

-and-

**OMNI HOTELS MANAGEMENT
CORPORATION**

-and-

TRT HOLDINGS, INC.

-and-

WYNDHAM HOTELS & RESORTS INC.

-and-

**WYNDHAM HOTELS & RESORTS
CANADA, INC.**

Defendants

**ANSWER OF DEFENDANT
WYNDHAM HOTELS & RESORTS CANADA, INC.**
(Article 145 C.C.P.)

**FOLLOWING THE APPLICATION FOR AUTHORIZATION TO INSTITUTE A CLASS ACTION,
THE DEFENDANT WYNDHAM HOTELS & RESORTS CANADA, INC., DECLARES AS
FOLLOWS:**

1. The Defendant is represented by **DLA PIPER (CANADA) LLP**, whose contact information is as follows :

DLA PIPER (CANADA) LLP

1501, McGill College Avenue

Suite 1400

Montréal, QC, H3A 3M8

Me Tania Da Silva

taniasilva@dlapiper.com

Telephone : (514) 392-8427

Fax : (514) 392-8374

Me Annie-Claude Authier

annie-claude.authier@ca.dlapiper.com

Telephone : (514) 392-8448

Fax: (514) 392-1999

2. Under all legal reserve of their rights, including all preliminary applications that may be applicable and, without limitation, their right to contest the Court's jurisdiction, the Defendant intends to contest the *Application for authorization to institute a class action*.
3. The present Answer and any acceptance of service does not constitute in any way an acknowledgement or an acceptance of the Superior Court of Quebec's jurisdiction over the Defendant.

[Signatures at the following page]

MONTREAL, March 20, 2026.

DLA Piper (Canada) LLP

DLA PIPER (CANADA) LLP

*Attorneys for Defendant Wyndham Hotels
& Resorts Canada, Inc.*

1501, McGill College Avenue, Suite 1400
Montréal, QC, H3A 3M8

Me Tania Da Silva

tania.dasilva@dlapiper.com

Telephone : 514.392.8427

Fax : 514.392.8374

Me Annie-Claude Authier

annie-claude.authier@dlapiper.com

Telephone : 514.392.8448

Fax: 514.392.1999

Our Reference : 115157-00005

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WYNDHAM HOTELS & RESORTS CANADA, INC.**
(Article 145 C.C.P.)

ORIGINAL

DLA PIPER (CANADA) LLP O/R : 115157-00005
*Attorneys for Defendant Wyndham Hotels & Resorts
Canada, Inc.*

1501, McGill College avenue, Suite 1400
Montréal, QC , H3A 3M8

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taniasilva@dlapiper.com

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