

CANADA

PROVINCE OF QUEBEC  
DISTRICT OF QUEBEC

N°: 200-06-000274-251

**SUPERIOR COURT**  
(Class Action)

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**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-

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**OMNI HOTELS MANAGEMENT  
CORPORATION**

-and-

**TRT HOLDINGS, INC.**

-and-

**WYNDHAM HOTELS & RESORTS INC.**

-and-

**WYNDHAM HOTELS & RESORTS  
CANADA INC.**

Defendants

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

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

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

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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, February 20, 2026.

*DLA Piper (Canada) LLP*

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**DLA PIPER (CANADA) LLP**

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

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Our Reference : 115157-00005

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*Plaintiff*

v.

**INTEGRATED DECISIONS AND SYSTEMS, INC., et als.**

*Defendants*

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

ORIGINAL

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

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