

C A N A D A

PROVINCE OF QUÉBEC  
DISTRICT OF MONTRÉAL

N°: 500-06-001187-224

**SUPERIOR COURT**  
**(Class Action)**

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**MARTIN KODYKBO**

Applicant

v.

**HYUNDAI AUTO CANADA CORPORATION**

**HYUNDAI MOTOR AMERICA INC.**

**HYUNDAI MOTOR MANUFACTURING  
ALABAMA LLC**

**HYUNDAI MOTOR COMPANY**

**KIA CANADA INC.**

**KIA AMERICA, INC.**

**KIA MOTORS MANUFACTURING GEORGIA  
INC.**

**KIA MOTOR COMPANY**

Respondents

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**ANSWER OF RESPONDENTS HYUNDAI AUTO CANADA CORPORATION,  
HYUNDAI MOTOR MANUFACTURING ALABAMA LLC AND KIA MOTORS  
MANUFACTURING GEORGIA INC.**

**(Art. 145 and 147 C.C.P.)**

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PURSUANT TO APPLICANT'S APPLICATION FOR AUTHORIZATION TO INSTITUTE A CLASS ACTION, THE RESPONDENTS, HYUNDAI AUTO CANADA CORPORATION, HYUNDAI MOTOR MANUFACTURING ALABAMA LLC AND KIA MOTORS MANUFACTURING GEORGIA INC. (NOW KNOWN AS KIA GEORGIA, INC.) STATE THAT:

1. Respondents Hyundai Auto Canada Corporation, Hyundai Motor Manufacturing Alabama LLC and Kia Motors Manufacturing Georgia Inc. (now known as Kia Georgia, Inc.) are represented by Bennett Jones LLP whose contact information is as follows:

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2. The Respondents, Hyundai Auto Canada Corporation, Hyundai Motor Manufacturing Alabama LLC and Kia Motors Manufacturing Georgia Inc. (now known as Kia Georgia, Inc.), contest the Québec Court jurisdiction;
3. Without prejudice to the above, pending a decision on the issue of jurisdiction, Respondents, Hyundai Auto Canada Corporation, Hyundai Motor Manufacturing Alabama LLC and Kia Motors Manufacturing Georgia Inc. (now known as Kia Georgia, Inc.), confirm that they will contest Applicant's Application for authorization to institute a class action. Respondents, Hyundai Auto Canada Corporation, Hyundai Motor Manufacturing Alabama LLC and Kia Motors Manufacturing Georgia Inc. (now known as Kia Georgia, Inc.), therefore reserve all their rights.

Montréal, July 21, 2022

*Bennett Jones LLP*

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**BENNETT JONES LLP**

Attorneys for Respondents Hyundai Auto  
Canada Corporation, Hyundai Motor  
Manufacturing Alabama LLC and Kia Motors  
Manufacturing Georgia Inc. (now known as  
Kia Georgia, Inc.)

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**HYUNDAI AUTO CANADA CORPORATION  
ET AL.**

Respondents

**BENNETT JONES LLP ANSWER FOR  
HYUNDAI AUTO CANADA  
CORPORATION, HYUNDAI MOTOR  
MANUFACTURING ALABAMA LLC AND  
KIA MOTORS MANUFACTURING  
GEORGIA INC.**

**COPY**

**BD 4186**

**File : 2137-2**



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