

C A N A D A

PROVINCE OF QUÉBEC  
DISTRICT OF MONTRÉAL

N°: 500-06-001187-224

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

---

**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

---

**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.)**

---

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. D3B Avocats Inc. will act as Avocats-conseils for Respondents Hyundai Auto Canada Corporation, Hyundai Motor Manufacturing Alabama LLC and Kia Motors Manufacturing Georgia Inc. (now known as Kia Georgia, Inc.):

Me Pascale Dionne-Bourassa  
D3B AVOCATS INC.  
17, rue des Huards  
Verdun (Québec) H3E 1X9  
Tél : 514 360-5731  
Télec : 514 447-1953  
[pdb@d3bavocats.com](mailto:pdb@d3bavocats.com)

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

*D3b avocats inc. (s)*

---

**D3B AVOCATS INC.**

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

Me Pascale Dionne-Bourassa

17, rue des Huards

Verdun (Québec) H3E 1X9

Tél : 514 360-5731 Téléc : 514 447-1953

[pdb@d3bavocats.com](mailto:pdb@d3bavocats.com)

BD 4186

N/D : 2137-2

**SUPERIOR COURT  
DISTRICT OF QUEBEC**

**MARTIN KODYKBO**

Applicant

v.

**HYUNDAI AUTO CANADA CORPORATION  
ET AL.**

Respondents

**D3b Avocats inc. ANSWER FOR HYUNDAI  
AUTO CANADA CORPORATION,  
HYUNDAI MOTOR MANUFACTURING  
ALABAMA LLC AND KIA MOTORS  
MANUFACTURING GEORGIA INC.  
(Avocats-conseils)**

**COPY**

**BD 4186**

**File : 2137-2**



**M<sup>e</sup> Pascale Dionne-Bourassa**

17, Des Huards Street  
Verdun (Quebec) H3E 1X9  
Telephone: 514-360-5731  
Fax: 514-447-1953  
[pdb@d3bavocats.com](mailto:pdb@d3bavocats.com)