

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 MOTOR AMERICA INC.,  
HYUNDAI MOTOR COMPANY, KIA CANADA INC., KIA AMERICA,  
INC. KIA MOTOR COMPANY**

**(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 MOTOR AMERICA INC., HYUNDAI MOTOR COMPANY, KIA CANADA INC., KIA AMERICA, INC. AND KIA MOTOR COMPANY, STATE THAT:

1. Bennett Jones (Québec) s.e.n.c.r.l. will act as Avocats-conseils for Respondents Hyundai Motor America Inc., Hyundai Motor Company, Kia Canada Inc., Kia America, Inc. and Kia Motor Company:

Me Pascale Dionne-Bourassa  
Bennett Jones (Québec) s.e.n.c.r.l.  
17, rue des Huards  
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Tél : 514 865-5844  
Bourassap@bennettjones.com

2. The Respondents, Hyundai Motor America Inc., Hyundai Motor Company, Kia Canada Inc., Kia America, Inc. and Kia Motor Company, contest the Québec Court jurisdiction;
3. Without prejudice to the above, pending a decision on the issue of jurisdiction, Respondents, Hyundai Motor America Inc., Hyundai Motor Company, Kia Canada Inc., Kia America, Inc. and Kia Motor Company, confirm that they will contest Applicant's Application for authorization to institute a class action. Respondents, Hyundai Motor America Inc., Hyundai Motor Company, Kia Canada Inc., Kia America, Inc. and Kia Motor Company, therefore reserve all their rights.

Montréal, December 5, 2022  
***BENNETT JONES (QUÉBEC)***  
***S.E.N.C.R.L. (s)***

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**Bennett Jones (Québec) s.n.c.r.l.**  
Avocats-conseils for Respondents Hyundai  
Motor America Inc., Hyundai Motor  
Company, Kia Canada Inc., Kia America,  
Inc. and Kia Motor Company  
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BB 9658 N/D : 088122.00013

**SUPERIOR COURT  
DISTRICT OF QUEBEC**

**MARTIN KODYKBO**

Applicant

v.

**HYUNDAI AUTO CANADA CORPORATION  
ET AL.**

Respondents

**BENNETT JONES (QUÉBEC) S.E.N.C.R.L.  
ANSWER FOR HYUNDAI MOTOR  
AMERICA INC., HYUNDAI MOTOR  
COMPANY, KIA CANADA INC., KIA  
AMERICA, INC. KIA MOTOR COMPANY  
(Avocats-conseils)**

**COPY**

**BB 9658**

**File: 088122.00013**

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