

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

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

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. Respondents Hyundai Motor America Inc., Hyundai Motor Company, Kia Canada Inc., Kia America, Inc. and Kia Motor Company, are represented by Bennett Jones LLP whose contact information is as follows:

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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 LLP

BENNETT JONES LLP

Attorneys for Respondents Hyundai
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**BENNETT JONES LLP ANSWER FOR
HYUNDAI MOTOR AMERICA INC.,
HYUNDAI MOTOR COMPANY, KIA
CANADA INC., KIA AMERICA, INC. AND
KIA MOTOR COMPANY**

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