

**CANADA**

**PROVINCE OF QUEBEC  
DISTRICT OF MONTREAL**

**N° : 500-06-001241-237**

**SUPERIOR COURT  
(Class Action)**

**LUCIA PALLANTE**

and

**EMILY PERREAULT**

Applicants

v.

**ARC AUTOMOTIVE, INC.**

and

**JOYSON SAFETY SYSTEMS, formerly  
known as KEY SAFETY SYSTEMS INC.**

and

**TOYOTA GOSEI NORTH AMERICA  
CORPORATION**

and

**GENERAL MOTORS OF CANADA  
COMPANY**

and

**FORD MOTOR COMPANY OF CANADA,  
LIMITED**

and

**VOLKSWAGEN GROUP CANADA INC.**

and

**AUDI CANADA INC.**

and

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**BMW CANADA INC.**

and

**PORSCHE CARS CANADA, LTD**

and

**HYUNDAI MOTOR AMERICA**

and

**KIA CANADA INC.**

and

**FCA CANADA INC.**

Defendants

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**ANSWER**

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

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**PURSUANT TO APPLICANTS' APPLICATION TO AUTHORIZE THE BRINGING OF A CLASS ACTION & TO APPOINT THE APPLICANTS AS REPRESENTATIVE PLAINTIFFS, THE DEFENDANTS, HYUNDAI MOTOR AMERICA and KIA CANADA INC., STATE THAT:**

1. The Defendants HYUNDAI MOTOR AMERICA and KIA CANADA INC. are represented by Bennett Jones LLP whose contact information is as follows:

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2. The Defendants HYUNDAI MOTOR AMERICA and KIA CANADA INC. contest the Quebec Court's jurisdiction;
3. Without prejudice to the above, pending a decision on the issue of jurisdiction, the Defendants HYUNDAI MOTOR AMERICA and KIA CANADA INC. confirm that they will contest Applicants' *Application to authorize the bringing of a Class Action & to appoint the Applicants as representative Plaintiffs*. The Defendants HYUNDAI MOTOR AMERICA and KIA CANADA INC. therefore reserve all their rights.

Montréal, July 26, 2023

BENNETT JONES LLP

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**Bennett Jones LLP**

*Attorneys for the Defendants*

*Hyundai Motor America & Kia Canada Inc.*

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**BENNETT JONES LLP ANSWER  
FOR HYUNDAI MOTOR AMERICA  
AND KIA CANADA INC.**

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