

**C A N A D A
PROVINCE OF QUÉBEC
DISTRICT OF QUÉBEC**

No.: 200-06-000274-251

**SUPERIOR COURT
(Class Action Division)**

PATRICK BENOIT

Plaintiff

v.

**INTEGRATED DECISIONS AND
SYSTEMS, INC.**

and

SAS INSTITUTE (CANADA) INC.

and

SAS INSTITUTE INC.

and

ACCOR MANAGEMENT CANADA INC.

and

CHOICE HOTELS INTERNATIONAL INC.

and

**CHOICE HOTELS CANADA INC./LES
HÔTELS DE CHOIX DU CANADA INC.**

and

**FOUR SEASONS HOTELS LIMITED /
HOTELS QUATRE SAISONS LIMITEE**

and

HILTON WORLDWIDE HOLDINGS INC.

and

HILTON CANADA CO.

and

**HILTON INTERNATIONAL CANADA CRA
ULC**

and

HYATT HOTELS CORP.

and

HYATT PROPERTY MANAGEMENT INC.

and

**HYATT HOTELS OF CANADA,
INC./HYATT HÔTELS DU CANADA**

and

**OMNI HOTELS MANAGEMENT
CORPORATION**

and

TRT HOLDINGS, INC.

and

WYNDHAM HOTELS & RESORTS INC.

and

**WYNDHAM HOTELS & RESORTS
CANADA, INC.**

Defendants

ANSWER
(Articles 145, para. 2 and 147 C.C.P.)

We, the undersigned, NORTON ROSE FULBRIGHT CANADA LLP, attorneys for Defendants **OMNI HOTELS MANAGEMENT CORPORATION** and **TRT HOLDINGS, INC.**, hereby answer the Summons of the Plaintiff by contesting the "*Demande pour obtenir l'autorisation d'exercer une action collective et pour obtenir le statut de représentant (articles 574 et ss. C.p.c.)*" and by cooperating in establishing with the Plaintiff a Protocol that will govern the conduct of the proceedings.

The Defendants **OMNI HOTELS MANAGEMENT CORPORATION** and **TRT HOLDINGS, INC.** reserves all of their rights, including the right to contest the jurisdiction of this Court.

Montréal, January 29, 2026

*Norton Rose Fulbright
Canada LLP*

NORTON ROSE FULBRIGHT CANADA LLP

(Mtre. Eric Lefebvre)

Attorneys for Defendants

**OMNI HOTELS MANAGEMENT
CORPORATION and TRT HOLDINGS, INC.**

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PATRICK BENOIT

Plaintiff

v.

**INTEGRATED DECISIONS AND
SYSTEMS, INC. ET ALS.**

Defendants

**ANSWER
(Articles 145, para. 2 and 147 C.C.P.)**

ORIGINAL

BO-0042

1001374781

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