

CANADA

**PROVINCE OF QUEBEC
DISTRICT OF MONTREAL**

N° : 500-06-001414-255

SUPERIOR COURT
(Class Actions Division)

ANNE ROBILLARD

Applicant

v.

OPENAI INC.

and

OPENAI GLOBAL, LLC

and

OPENAI GP, LLC

and

OPENAI HOLDINGS, LLC

and

OPENAI OPCO, LLC

and

OAI CORPORATION

and

OPENAI STARTUP FUND GP I, LLC

and

OPENAI STARTUP FUND I, L.P.

and

**OPENAI STARTUP FUND
MANAGEMENT, LLC**

and

OPENAI L.L.C.

and

MICROSOFT CORPORATION

and

MICROSOFT CANADA INC.

Defendants

ANSWER TO SUMMONS

(art. 145 C.c.p.)

We, the undersigned attorneys, hereby appear on behalf of the defendants, **OPENAI INC., OPENAI GP, L.L.C., OPENAI GLOBAL, LLC, OPENAI OPCO LLC, OPENAI HOLDINGS LLC, OPENAI L.L.C., OAI CORPORATION, OPENAI STARTUP FUND 1, L.P., OPENAI STARTUP FUND GP I, L.L.C., OPENAI STARTUP FUND MANAGEMENT, LLC**, under strict reserve of all legal objections, including the jurisdiction of the Quebec courts on this dispute.

1. They are represented by Gowling WLG (Canada) S.E.N.C.R.L., s.r.l. (Me Guy Poitras and Me Gabriel D'Addona), their contact information being:

Me Guy Poitras / Me Gabriel D'Addona
Gowling WLG (Canada) S.E.N.C.R.L., s.r.l.
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2. They have the intention to dispute the Application for authorization to institute a class action and to be granted representative status and to collaborate with applicant in preparing the case;
3. They reserve all of their rights, including the right to contest the court's jurisdiction.

Montréal, January 15, 2026

Gowling WLG (Canada) s.e.n.c.r.l., s.r.l.

GOWLING WLG (CANADA) S.E.N.C.R.L., s.r.l.
Lawyers for defendants
OPENAI INC., OPENAI GP, L.L.C., OPENAI GLOBAL, LLC, OPENAI OPCO LLC, OPENAI HOLDINGS LLC, OPENAI L.L.C., OAI CORPORATION, OPENAI STARTUP FUND 1, L.P., OPENAI STARTUP FUND GP I, L.L.C., OPENAI STARTUP FUND MANAGEMENT, LLC
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À: maudren@audrenrolland.com; mgrou@audrenrolland.com; Emmanuelle Rolland
Cc: Poitras, Guy; D'Addona, Gabriel
Objet: NOTIFICATION - Answer to summons / Anne Robillard c. OpenAI inc. et al. - 500-06-001414-255 (N/D: G10076603)
Pièces jointes: Answer to summons(92301253.1).pdf

NOTIFICATION PAR COURRIEL

(ART. 134 C.P.C.)

BORDEREAU D'ENVOI

DATE DE L'ENVOI : Le 15 janvier 2026

Avocat :	Me Guy Poitras / Me Gabriel D'Addona
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IDENTIFICATION DU DOSSIER ET NATURE DU DOCUMENT TRANSMIS:

No de dossier de Cour :	500-06-001414-255
Parties :	Anne Robillard c. OpenAI inc. et al.
Nature des documents :	Answer to summons
Nombre total de pages :	3 pages

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N°: 500-06-001426-259

SUPERIOR COURT
(Class Actions Division)
DISTRICT OF MONTREAL

ANNE ROBILLARD

Applicant

v.

OPENAI INC.
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OPENAI GP, LLC
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OPENAI STARTUP FUND GP I, LLC
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OPENAI STARTUP FUND I, L.P.
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OPENAI STARTUP FUND MANAGEMENT, LLC
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OPENAI L.L.C.
and
MICROSOFT CORPORATION
and
MICROSOFT CANADA INC.

Defendants

BL0052

ANSWER TO SUMMONS
(Art. 145, C.c.p.)

ORIGINAL

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