

SUPERIOR COURT
(Class Actions Chamber)

CANADA
PROVINCE OF QUEBEC
DISTRICT OF MONTREAL

N° : 500-06-001400-254

HUGO CHICOINE-BLAIS

Applicant

v.

META PLATFORMS, INC.

Defendant

NOTICE OF WRITTEN EXAMINATION OF THE APPLICANT
(Arts 221, 223 & ff CCP)

TO: Mtre Saro Turner
Mtre François Pariseau
Mtre Andrea Roulet
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Lawyers for the Applicant

TAKE NOTICE that the Defendant Meta Platforms, Inc., through its undersigned counsel, hereby notifies the written examination of the Applicant Hugo Chicoine-Blais, pursuant to the judgment rendered by the Honourable Justice Lukasz Granosik, j.s.c. dated April 30, 2026 in the present matter.

The Applicant is required to answer this written examination **no later than June 30, 2026**, in accordance with the Court's judgment. The answers must be provided in writing, under oath, and signed by the Applicant. The answers must be direct, complete and precise, failing which they may be rejected and the facts to which the questions relate may be

deemed admitted. In the event of a failure to answer the questions, the facts to which the written examination relates may be deemed admitted.

GOVERN YOURSELF ACCORDINGLY.

Montreal, May 29, 2026

McCarthy Tétrault LLP

MCCARTHY TÉTRAULT LLP

Mtre Isabelle Vendette, Mtre Audrée Anne Barry,
Mtre Souhail Nejjar

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Lawyers for the Defendant, Meta Platforms, Inc.

**ALL NOTIFICATIONS BY E-MAIL MUST BE ADDRESSED
SOLELY TO NOTIFICATION@MCCARTHY.CA**

File reference : 204930-607963

WRITTEN EXAMINATION OF HUGO CHICOINE-BLAIS

A. Whether the Applicant read the applicable terms of service and policies when creating his Facebook and Instagram accounts and prior to their use

1. Please confirm the number of Facebook and Instagram account(s) held or controlled by you during the relevant period, between September 2024 and June 3, 2025 (“**Class Period**”), including all username(s) and associated URL hyperlink address to the account(s).
2. Have you ever read the content of the Privacy Policy? If so, please indicate when and whether you read the entire policy.
3. Have you ever read the content of the Facebook Terms of Service? If so, please indicate when and whether you read the entire Terms of Service.
4. Have you ever read the content of the Instagram Terms of Use? If so, please indicate when and whether you read the entire Terms of Use.
5. Have you ever read the content of the Cookies Policy? If so, please indicate when and whether you read the entire policy.

B. The Applicant’s configuration of his privacy and ad preferences setting on Facebook and Instagram during the Class Period

6. Did you at any time review your privacy settings in your Accounts Center on your Facebook account(s)? If so, please specify how these settings (including the Ad Preferences) were configured during the Class Period.
7. Did you at any time review your privacy settings in your Accounts Center on your Instagram account(s)? If so, please specify how these settings (including the Ad Preferences) were configured during the Class Period.
8. Did you make any changes to your privacy settings on your Facebook account(s) during the Class Period? If so, please specify all changes made to your privacy settings during that period.
9. Did you make changes to your privacy settings on your Instagram account(s) during the Class Period? If so, please specify all changes made to your privacy settings during that period.
10. Did you at any time use the tool “Your activity off Meta technologies” to disconnect any previously collected browsing data from your Facebook or Instagram account(s)? If so, please specify when.

11. Did you at any time use the tool “Your activity off Meta technologies” to turn off your future activity off Meta technologies from your Facebook or Instagram account(s)? If so, please specify when.
 12. Did you at any time modify the application permissions on your Android device for the Facebook or Instagram applications, including permissions relating to background data or background activity? If so, please specify when.
- C. The Applicant’s use of cookies on the third-party websites he visited and browsers he used during the Class Period, specifically in connection with the allegation contained at paragraph 121 of the Amended Application**
13. Please confirm the number of Android devices used or controlled by you during the relevant Class period, and that are relevant to the action.
 14. Which web browsers did you use on your Android device(s) during the Class Period?
 15. At paragraph 121 of the Application, you allege that you visited the website <https://ici.radio-canada.ca/>. Did you accept the cookies consent banner when visiting this website during the Class Period?
 16. At paragraph 121 of the Application, you allege that you visited the website <https://www.sportsnet.ca/>. Did you accept the cookies consent banner when visiting this website during the Class Period?
 17. At paragraph 121 of the Application, you allege that you visited the website <https://montrealgazette.com/>. Did you accept the cookies consent banner when visiting this website during the Class Period?
 18. Did you use Incognito Mode on your browser when visiting each of these websites during the Class Period?
 19. Please provide the list of all the cookies in your web browsers on your Android device(s) during the Class Period.
 20. Please identify any settings you configured, software you installed, or other efforts you made to block cookies on your Android device(s) during the Class Period.
 21. Please identify any other efforts you made to anonymize your browsing activity on your Android device(s) during the Class Period.
 22. Indicate which advertisers included you in their target audience based on your interactions with their website, app or store. This information is included in your *Download Your Information* (DYI) feature on Facebook under the section “*annonceurs utilisant vos infos ou votre activité*”.

From: Dardevet, Amélie
Sent: Friday, May 29, 2026 5:00 PM
To: sjt@slatervecchio.com; François Pariseau; acr@slatervecchio.com
Cc: Nejjar, Souhail; Vendette, Isabelle; Audrée Anne Barry
Subject: NOTIFICATION - Notice of written examination of the applicant (Art. 221, 223 & ff C.c.p.) - (HUGO CHICOINE-BLAIS vs. META PLATFORMS INC.) - (500-06-001400-254) - Our reference : 204930-607963 [MT-MTDOCS.FID5124644]
Attachments: 2026-05-29 - Notice of Written Examination of the Applicant.pdf

SUPERIOR COURT
(class action)

CANADA
PROVINCE OF QUEBEC
DISTRICT OF MONTREAL
N°.: 500-06-001400-254

HUGO CHICOINE-BLAIS
Applicant
vs
META PLATFORMS, INC.
Defendant

NOTIFICATION SLIP BY EMAIL
(Art. 133 and 134 C.C.P.)

MONTREAL, this **May 29, 2026**

TIME: See Notification Slip

SENDER:

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Our 204930-607963

Reference:

NATURE OF THE DOCUMENT

NOTICE OF WRITTEN EXAMINATION OF THE APPLICANT (Art. 221, 223 & ff C.c.p)

NUMBER OF PAGES TRANSMITTED

5

(not including the slip):

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Applicant

vs

META PLATFORMS, INC.

Defendant

**NOTICE OF WRITTEN EXAMINATION OF
THE APPLICANT
(Art. 221, 223 & ff C.c.p)**

ORIGINAL

M^{re} Isabelle Vendette / M^{re} Audrée Anne Barry / M^{re} Souhail
Nejjar
Our reference : 204930-607963

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