

C A N A D A

**PROVINCE OF QUEBEC
DISTRICT OF MONTREAL**

N° 500-06-000993-192

S U P E R I O R C O U R T
(Class Actions Division)

LYSE BEAULIEU

Plaintiff

v.

META PLATFORMS, INC.

- and -

FACEBOOK CANADA LTD.

Defendants

NOTICE OF CASE MANAGEMENT IN A CLASS ACTION
(Art. 158 C.C.P.)

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Counsel for the Defendants Meta Platforms, Inc. and Facebook Canada Ltd.

TAKE NOTICE that the Plaintiff, Lyse Beaulieu, is requesting a case management conference presided by the Honourable Donald Bisson, Judge of the Superior Court, sitting in the Class Actions Division in and for the district of Montreal, and appointed to hear this case, **on the day and time that counsel may be heard**, with respect to the following matters:

(a) Fixing a case protocol

The main points, briefly outlined, that will be the focus of the case management conference are:

1. On December 22, 2022, the Court of Appeal authorized a class action against the Defendants, Meta Platforms, Inc. (formerly Facebook, Inc.) and Facebook Canada Ltd. brought by the Representative Plaintiff, Lyse Beaulieu, on behalf of the following group:

All Facebook users located in Quebec who were seeking employment or housing or who were interested in advertisements for employment or housing and who, due to their race, sex or age, were excluded by Facebook's advertising services from receiving advertisements for employment or housing opportunities on Facebook between April 11, 2016, and [December 22, 2022].

2. On August 21, 2023, the Supreme Court of Canada denied the Defendants' application for leave to appeal from the Court of Appeal's decision.
3. On November 30, 2023, the Representative Plaintiff filed an *Originating Application* instituting the class action against the Defendants.
4. On April 29, 2025, the Honourable Donald Bisson J.C.S. issued a judgment extending the delay to set down for trial and judgment to December 31, 2025.
5. On May 2, 2025, class counsel sent a draft first case protocol to Defendants' counsel, inviting them to comment and complete their sections.
6. On May 16, 2025, Defendants' counsel sent back a completed case protocol.
7. The same day, the parties' counsel participated in a call to discuss the completed case protocol. Class counsel expressed its view that the timelines proposed by Defendants' counsel were unacceptably and unnecessarily long.
8. On May 26, 2025, class counsel communicated a new version of the case protocol, which notably proposed a shorter timeline for the steps to set down the case for trial.
9. On May 30, 2025, Defendants' counsel responded indicating their disagreement with many of the proposed modifications, as well as with the idea that class counsel would have the right to examine a representative of each of the two Defendants.
10. Despite attempts to jointly establish the case protocol, the parties have ultimately been unable to reach an agreement about numerous steps in the case protocol.
11. Consequently, class counsel submits its May 26, 2025 protocol as a Proposed Case Protocol and respectfully asks this Court to approve its terms.

MONTREAL, June 6, 2025

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