

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

APPLICATION FOR APPROVAL OF NOTICE TO CLASS MEMBERS
(Arts. 576 and 579 C.C.P.)

**TO THE HONOURABLE DONALD BISSON, JUDGE OF THE SUPERIOR COURT, SITTING
IN THE CLASS ACTIONS DIVISION, APPOINTED TO HEAR THIS CASE, THE PLAINTIFF
SETS OUT AS FOLLOWS:**

I. PROCEDURAL CONTEXT

1. On December 22, 2022, the Court of Appeal authorized against the Defendants, Meta Platforms, Inc. (formerly Facebook, Inc.) and Facebook Canada Ltd. a class action 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.

II. **APPLICATION FOR APPROVAL OF NOTICE TO CLASS MEMBERS AND THE PROTOCOL FOR ITS DISTRIBUTION**

5. Pursuant to articles 576 and 579 of the *Code of Civil Procedure*, when a class action is authorized, a notice must be published or notified to class members.
6. The Representative Plaintiff therefore seeks this Court's approval of the proposed notice to class members of authorization of a class action ("**Notice to Members**"), in English and in French (**Exhibit R-1**).
7. The Notice to Members informs the members of the class action about the authorization of the class action, states the Representative Plaintiff's name, describes the conditions to be fulfilled to qualify as a class member and the main issues to be adjudicated on the merits collectively, including the conclusions sought in relation to those issues.
8. The Notice to Members also informs the members of their rights as class members, including their right to opt out of the class action. It includes the form for opting out of the class action. It also specifies that no class member other than the Representative Plaintiff and any intervenor may be required to pay legal costs arising from the class action.
9. Finally, the Notice to Members invites members with questions or those seeking additional information to contact class counsel.
10. The parties agree on almost all the content of the Notice to Members. They disagree only about the formulation of the common questions in the English version of the Notice to Members.
11. The Representative Plaintiff proposes the following distribution protocol (the "**Distribution Protocol**"):
 - Facebook shall send a copy of the Notice to Members by email to all Facebook users from Quebec who had Facebook accounts during the class period. The Notice to Members should be sent within 15 days following the date of the judgment approving the Notice to Members.
 - Class counsel will post the Notice to Members on its website.
 - Class counsel will register the Notice to Members with the Registry of class actions.
12. The Distribution Protocol ensures that all potential class members are contacted directly in a cost-effective manner. It also makes the Notice to Members available to the public, thereby publishing the relevant information for potential class members who cannot be reached by email.

13. The cost of sending the Notice to Members should be assumed by the Defendants, pursuant to paragraph 13 of the judgment authorizing the class action (*Beaulieu v. Facebook inc.*, [2022 QCCA 1736](#)).
14. The Representative Plaintiff proposes an opt-out period of 30 days after the Notice to Members is sent by email to class members.

FOR THESE REASONS, MAY IT PLEASE THE COURT TO:

- A. GRANT** the present Application;
- B. APPROVE** the French and English versions of the Notice to Members;
- C. APPROVE** the proposed Distribution Protocol;
- D. ORDER** the publication and notification of the Notice to Members within 15 days of the judgment to be rendered on the present application according to the following modalities:
 - i. Defendants shall send the Notice to Members to the email addresses of all Facebook users from Quebec who had Facebook accounts during the class period;
 - ii. Class counsel shall post the Notice to Members on class counsel's website; and
 - iii. Class counsel shall register the Notice to Members in the Registry of class actions;
- E. SET** the cut-off date of the opt-out period 30 days after the Notice to Members is sent by email to the class members;
- F. ORDER** the Defendants to assume the cost of sending the Notice to Members;
- G. THE WHOLE, WITHOUT COSTS.**

MONTREAL, June 6, 2025

(S) *IMK LLP*

M^e Jean-Michel Boudreau

M^e Olga Redko

M^e Jessica Michelin

jmboudreau@imk.ca

oredko@imk.ca

jmichelin@imk.ca

IMK LLP

3500 De Maisonneuve Boulevard

West Suite 1400

Montreal, Quebec H3Z 3C1

T: 514 934-7738 | 934-7742 | 934-7740

F: 514 935-2999

Attorneys for the Plaintiff

LYSE BEAULIEU

Our file: 5026-1

BI0080