

CANADA
PROVINCE OF QUÉBEC
District of Montréal
File No.: 500-06-000993-192

SUPERIOR COURT

LYSE BEAULIEU

Plaintiff

v.

META PLATFORMS INC.

and

FACEBOOK CANADA LTD.

Defendant

and

Select an option Party

FIRST CASE PROTOCOL IN CIVIL MATTERS
PRESENTATION PAGE
Superior Court of Québec

1. **You are required** to complete this presentation page when filing a **first case protocol** (but not when filing a modified protocol).
2. Place this page **before** the case protocol (before page 1) and staple them together.

The parties do not agree on the duration, location, or format of the examinations. (lines 20-22 of the protocol)	☐ YES ☒ NO
The parties do not agree on the number of representatives to be examined within the same party. (lines 20-22)	☐ YES ☒ NO
The parties do not agree on the number or content of expert opinions to be produced. (lines 23-26)	☐ YES ☒ NO
At least one party intends to seek authorization to file a written defence. (line 28)	☒ YES ☐ NO
The parties request a stay of the proceeding. (line 5)	☐ YES ☒ NO

The parties request an extension on the time limit.
(lines 6 and 37)

☒ YES ☐ NO

RESERVED FOR CLERK: Check if protocol or proposed protocol was sorted for CHEM*EXA input ☐

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SUPERIOR COURT

LYSE BEAULIEU

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PROPOSED CASE PROTOCOL IN CIVIL MATTERS

Superior Court of Québec
(art. 148 C.C.P.)

General provisions

1.	Date originating application was served	30 novembre 2023
2.	Nature of dispute: Class action	
3.	Amount in dispute: \$ to be determined	
4.	Issues in dispute (must be joint): Common issues authorized by the Court of Appeal on December 22, 2022: i. Did Facebook, Inc. and Facebook Canada Ltd. breach class members' rights under the Quebec Charter of human rights and freedoms by allowing and facilitating the use of their advertising services to exclude individuals from viewing advertisements for employment or housing opportunities on the basis of their race, sex, or age? ii. Did Facebook, Inc. and Facebook Canada Ltd. breach class members' rights under the Quebec Charter of human rights and freedoms by delivering employment or housing advertisements preferentially to certain individuals on the basis of their race, sex, or age?	

	iii. Are Facebook, Inc. and Facebook Canada Ltd. liable to the class members for moral damages, and if so, in what amount? iv. Are Facebook, Inc. and Facebook Canada Ltd. liable to the class members for punitive damages, and if so, in what amount? v. Should an injunction be issued to prohibit Facebook, Inc. and Facebook Canada Ltd. from allowing and/or facilitating the discriminatory targeting or delivery of advertising based on race, sex, or age with respect to employment and housing opportunities?		
5.	All parties request a stay of proceedings ☐ 1 month ☐ 3 months ☐ 6 months		☐ yes ☒ no
6.	All parties request an extension on the time limit for setting down ☐ 3 months ☐ 6 months ☐ 9 months (see line 37)		☒ yes ☐ no
7.	A settlement conference: ☐ is requested by all parties ☐ is probable ☒ is possible ☐ is out of the question		

Preliminary exceptions		Filing Deadline
8.	☐ Declinatory exception (art. 167 C.C.P.) by Party concerned	Enter the date
9.	☐ Exception to dismiss / abuse of procedure (arts 168. / 51 C.C.P.) by Party concerned	Enter the date
10.	☐ Document clarification / disclosure (art. 169 C.C.P.) by Party concerned	Enter the date
11.	☐ Striking of allegations (art. 169 C.C.P.) by Party concerned	Enter the date
12.	☐ Suretyship as security for fees (art. 492 C.C.P.) by Party concerned	Enter the date
13.	☒ Other: Filing by defendants of an Application for leave to examine class members by Defendants	28 novembre 2025

Incidental procedures		Filing Deadline
14.	☐ Forced intervention (art. 188 C.C.P.) by Party concerned	Enter the date
15.	☐ Call in warranty (art. 189 C.C.P.) by Party concerned	Enter the date
16.	☐ Disqualification to act (art. 193 C.C.P.) by Party concerned	Enter the date
17.	☒ Amendment of pleading (art. 206 C.C.P.) by Party concerned	At any time prior to inscription
18.	☒ Other: Filing by plaintiff of an Application regarding the notice campaign; by Plaintiff	6 juin 2025

Safeguard measures (arts. 158 para. 5 and 169 para. 1 C.C.P.)		Filing Deadline
19.	Requested by Party concerned Nature:	Enter the date

Witnesses for the [Other party]			
22.	Name:	Duration: hrs. ☒ oral ☐ written	Cliquez ou appuyez ici pour entrer une date.
	Name:	Duration: hrs. ☐ oral ☐ written	Enter the date
NOTE: The examining party will request all documents to be discussed with the witness <u>at least 14 days before the examination</u>. The witness <u>must</u> provide those documents <u>at least 3 days before</u> the examination. Undertakings that are still missing will be disclosed to all parties no later than 14 days after the examination. Counsel is strongly encouraged not to wait on stenographer's notes to disclose.			

Necessary expert opinions (art. 232 C.C.P.)			Filing Deadline
23.	Joint expert opinion(s) ☐ yes ☒ no If yes, describe the nature: If no, state grounds for refusal: The parties' positions are diametrically opposed as to the existence of a fault. In this context, a joint expert appraisal will not reduce the number of questions to be analyzed and answered by the experts.		Enter the date
24.	Expert opinions for the Plaintiff ☒ yes ☐ no (only one per area) Nature: Algorithmic discrimination resulting from Facebook's Lookalike Audience targeting practices Nature:		26 juin 2026
25.	Expert opinions for the Defendant ☒ yes ☐ no (only one per area) Nature: Facebook's ad delivery system and technology, including the role of artificial intelligence in ad delivery, and the delivery of housing and employment ads. This encompasses functions of machine-learning models / auction, targeting, Lookalike Audiences tools, the role of algorithms, as well as factors influencing delivery. Nature: The online advertising, including the practices and strategies of advertisers and the ad delivery. Nature: Marketing research, including marketing tools available in Québec, as well as the behavior of people searching for jobs and housing.		30 octobre 2026
26.	Expert opinions for [Other party] ☐ yes ☐ no (only one per area) Nature: Nature:		Enter the date

Defence (art. 171 C.C.P.)		Filing Deadline
27.	☐ The defence will be produced by means of a brief statement	Enter the date
28.	☒ Authorization requested to file a written defence	13 février 2026

	State the basis for a written defence: The complexity of the case, the technical nature of the case, including the algorithms, and the proper conduct of the proceedings given the nature of the issues to be decided with respect to the facts alleged and the particular procedural vehicle of the class action. In this context, and in order to ensure that the defendants' right to a full answer and defence is upheld, the defendants seek leave to file a written defence in this case.	
29.	Cross-application by Party concerned ☐ yes ☐ no	Enter the date
30.	Defence to cross-application ☐ oral ☐ written	Enter the date

Disclosure of evidence (art. 248 C.C.P.)		Filing Deadline
31.	By Plaintiff Exhibits and affidavits (in lieu of testimony)	20 novembre 2026
32.	By Defendant Exhibits and affidavits (in lieu of testimony)	19 février 2027
33.	By [Other party] Exhibits and affidavits (in lieu of testimony)	Enter the date

Legal costs (art. 339 C.C.P.)		Foreseeable costs
34.	Assessment of Plaintiff legal costs (including expert opinions)	\$25,000
35.	Assessment of Defendant legal costs (including expert opinions)	\$150,000
36.	Assessment of legal costs of [Other party] (including expert opinions):	\$(Amount]

Request for setting down for trial and judgment (arts. 173, 174 C.C.P.)	
37.	☐ It will be filed within the <u>strict time limit</u> determined in accordance with article 173 C.C.P. or ☒ An extension is granted until 5 mars 2027 .

The parties intend to use the following notification method (arts. 110 et seq. C.C.P.): ¹			
38.	☐ bailiff	☒ email (address below)	☐ other:

NOTE: Non-compliance with this protocol may constitute a breach within the meaning of articles 341 and 342 C.C.P.

Signed on June ____, 2025

Signed on June 10, 2025

¹ This protocol must be notified to the parties, unless they have signed it (art. 149 C.C.P.). Proof of notification must be enclosed with the protocol.

Plaintiff

or

M^{tre} Jean-Michel Boudreau

Me Olga Redko

Me Jessica Michelin

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Signed on Enter the date

McCarthy Tétrault LLP

Defendant

or

M^{tre} Isabelle Vendette

Me Emmanuelle Poupart

Me Audrée Anne Barry

Counsel for the Defendant

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Signed on Enter the date

Party

or

M^{tre}

Counsel for

Telephone:

Email:

Party

or

M^{tre}

Counsel for

Telephone:

Email: