

CANADA

PROVINCE OF QUEBEC
DISTRICT OF MONTREAL

N° : 500-06-001426-259

SUPERIOR COURT
(Class Actions Division)

CHLOÉ SABOURIN

Applicant

v.

OPENAI INC.
and
OPENAI GLOBAL, LLC
and
OPENAI GP, LLC
and
OPENAI HOLDCO, LLC
and
OPENAI HOLDINGS, LLC
and
OPENAI OPKO, LLC
and
OAI CORPORATION
and
OPENAI STARTUP FUND GO I, LLC
and
OPENAI STARTUP FUND I, L.P.
and
**OPENAI STARTUP FUND
MANAGEMENT, LLC**

Defendants

ANSWER TO SUMMONS
(art. 145 C.c.p.)

We, the undersigned attorneys, hereby appear on behalf of the defendants 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.
1, Place Ville Marie, bureau 3700
Montreal (Quebec) H3B 3P4
Telephone : 514-392-9511 / 514-392-9598
Fax : 514-878-1450
Email : guy.poitras@gowlingwlg.com and gabriel.daddona@gowlingwlg.com

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, November 18, 2025

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

Me Guy Poitras and Me Gabriel D'Addona

1, Place Ville Marie, bureau 3700

Montréal (Québec) H3B 3P4

Telephone : 514-392-9511 / 514-392-9598

Fax : 514-878-1450

Email : guy.poitras@gowlingwlg.com and
gabriel.daddona@gowlingwlg.com

Morin, Sylvie

De: Morin, Sylvie
Envoyé: 18 novembre 2025 09:17
À: sebtiamal@twinlisbet.com
Cc: Poitras, Guy; D'Addona, Gabriel
Objet: NOTIFICATION - Answer to summons / Chloé Sabourin c. OpenAI inc. et al. - 500-06-001426-259 (N/D: G10086048)
Pièces jointes: Answer to summons (OpenAI)(91079372.1)(91295556.1).pdf

**NOTIFICATION PAR COURRIEL
(ART. 134 C.P.C.)
BORDEREAU D'ENVOI**

DATE DE L'ENVOI : Le 18 novembre 2025

Avocat :	Me Guy Poitras / Me Gabriel D'Addona
Étude :	Gowling WLG (Canada) S.E.N.C.R.L., s.r.l.
Adresse :	3700-1 Place Ville Marie, Montreal (Québec) H3B 3P4
Téléphone :	514 392 9511 / 514-392-9598
Adresse courriel :	guy.poitras@gowlingwlg.com / gabriel.daddona@gowlingwlg.com
Notre référence :	G10086048

DESTINATAIRE :

Nom	Entreprise	Adresse courriel
Me Amal Sebti	Twin Lisbet inc.	sebtiamal@twinlisbet.com

IDENTIFICATION DU DOSSIER ET NATURE DU DOCUMENT TRANSMIS:

No de dossier de Cour :	500-06-001426-259
Parties :	Chloé Sabourin c. OpenAI inc. et al.
Nature des documents :	Answer to summons
Nombre total de pages :	3 pages

Sylvie Morin
*Adjointe Administrative Juridique
Legal Administrative Assistant*
Tél./T +1 514 878 9641 x65221
Télec./F +1 514 878 1450
sylvie.morin@gowlingwlg.com



Gowling WLG (Canada) S.E.N.C.R.L., s.r.l.
1, Place Ville Marie, bureau 3700

Montréal QC H3B 3P4
Canada



gowlingwlg.com

[Gowling WLG](#) | +de 1 500 professionnels juridiques à l'échelle mondiale

N°: 500-06-001426-259

SUPERIOR COURT
(Class Actions Division)
DISTRICT OF MONTREAL

CHLOÉ SABOURIN

Applicant

v.

OPENAI INC.

and

OPENAI GLOBAL, LLC

and

OPENAI GP, LLC

and

OPENAI HOLDCO, LLC

and

OPENAI HOLDINGS, LLC

and

OPENAI OPCO, LLC

and

OAI CORPORATION

and

OPENAI STARTUP FUND GO I, LLC

and

OPENAI STARTUP FUND I, L.P.

and

OPENAI STARTUP FUND MANAGEMENT, LLC

Defendants

BL0052

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

ORIGINAL

Me Guy Poitras and Me Gabriel D'Addona
1, Place Ville Marie, bureau 3700
Montréal (Québec) H3B 3P4
Telephone : 514-392-9511 / 514-392-9598
Fax : 514-878-1450
Email : guy.poitras@gowlingwlg.com and
gabriel.daddona@gowlingwlg.com
Notre dossier : G10086048