

**CANADA  
PROVINCE OF QUÉBEC  
DISTRICT OF MONTRÉAL**

**CLASS ACTIONS DIVISION  
SUPERIOR COURT**

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**NO : 500-06-001263-231**

**THE CLASS**

and

**ASSOCIATION FOR THE RIGHTS OF  
HOUSEHOLD AND FARM WORKERS**

Representative Plaintiff

and

**BYRON ALFREDO ACEVEDO TOBAR**

Designated Member

v.

**ATTORNEY GENERAL OF CANADA**

Defendant

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**REPRESENTATIVE PLAINTIFF'S PARTICULARIZED INITIAL REQUEST FOR  
THE DISCLOSURE OF DOCUMENTS**

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**TO:**

M<sup>re</sup> Mariève Sirois-Vaillancourt

M<sup>re</sup> Emilie Tremblay

M<sup>re</sup> Kim Nguyen

M<sup>re</sup> Sean Doyle

M<sup>re</sup> Maria Rodriguez

**Department of Justice Canada**

**Quebec Regional Office**

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Counsel for the Defendant, Attorney General of Canada

**TAKE NOTICE** that the Representative Plaintiff requests the disclosure of the Documents described herein that are in the possession or under the control of the Government of Canada.

For the purposes of this request, the following terms have the following meanings:

- (a) **“Act”** means the *Immigration and Refugee Protection Act*, SC 2001, c. 27 and its predecessor statutes, including but not limited to the *Immigration Act, 1976*, SC 1976-77, c. 52 and the *Immigration Act*, RSC 1985, c. I-2, as amended from time to time;
- (b) **“Business Visitors”** means current or former business visitors admitted in Canada without a work permit as employees of foreign entities or as employees of short-term temporary residents (including domestic servants, personal assistants, nannies (caregivers) or au pair), excluding Excluded Individuals;
- (c) **“CIMM”** means the House of Commons Standing Committee on Citizenship and Immigration;
- (d) **“CIMM 2009 Report”** means the report entitled “Temporary Foreign Workers and Non-Status Workers” communicated as Exhibit P-7;
- (e) **“CIMM 2021 Report”** means the report entitled “Immigration Programs to Meet Labour Market Needs” communicated as Exhibit P-11;
- (f) **“CIMM 2024 Report”** means the report entitled “Conditions for Growth: Reconsidering Closed Work Permits in the Temporary Foreign Workers Program”, communicated as Exhibit P-10;
- (g) **“Class Period”** means the period since April 17, 1982;
- (h) **“Closed Work Permit”** means a work permit conditional on engaging in work for a specific employer or group of employers or at a specific employer workplace location or group of locations;
- (i) **“Document”** means any document, regardless of its nature, form and support, including a “Document” as defined in the Document Exchange Protocol agreed to by the Parties, and including, without limitation, Policies & Guidelines, letters, emails, telecopies, text messages, memoranda, briefing papers, research papers, policy papers, studies, analyses, fact sheets, data sheets, lists, registries, accounts, reports, submissions, statements, transcripts, minutes or notes of meetings or verbal exchanges, and documents of a similar nature;

- (j) **“Domestic Workers of Foreign Representatives”** means current or former domestic workers of foreign representatives accredited by the Government of Canada and admitted in Canada without a work permit, excluding Excluded Individuals;
- (k) **“DWAP”** means the Domestic Worker Accreditation Program and any similar program that may have preceded it during the Class Period;
- (l) **“Excluded Individuals”** means individuals who were employed by a foreign State or other foreign entity to work at an embassy, a high commission, a consulate, a permanent delegation to a United Nations agency, or a special representative office, as well as individuals employed by the United Nations, its agencies or an international organization of which Canada is a member;
- (l.1) **“Executive Official or Employee”** means a minister, member of the Cabinet, secretary of state, parliamentary secretary, chief of staff, deputy minister, associate deputy minister, or other official or employee of the Government of Canada occupying an executive-level role such as director general, senior director, executive director or director, regardless of the exact title of the position or role;
- (m) **“Government of Canada”** means the Government of Canada, any of its departments, agencies, branches, offices or subdivisions of a similar nature, and any of its ministers, officials or employees at any relevant period, currently including, without limitation, Immigration, Refugees and Citizenship Canada, Employment and Social Development Canada, Service Canada, Global Affairs Canada, the Office of Protocol of Canada, the Canadian Border Services Agency, and the Royal Canadian Mounted Police;
- (n) [...]
- (o) [...]
- (p) **“HUMA”** means the House of Commons Standing Senate Committee on Human Rights, Skills, Social Development and the Status of Persons with Disabilities;
- (q) **“HUMA 2016 Report”** means the report entitled “Temporary Foreign Worker Program”, communicated as Exhibit P-8;
- (r) **“LMIA”** means a labour market impact assessment, a labour market opinion, as such assessment was formerly known, or any assessment of a similar nature, regardless of its name, previously completed upon employers’ requests by agents of the Government of Canada;
- (s) **“NIEAP”** means the Non-Immigrant Employment Authorization Program launched in 1973, and subsequent iterations thereof before the formalization of the current TFWP;

- (s.1) **“Non-Preferred Countries of Origin”** means countries other than the United States of America, the United Kingdom, New Zealand, Australia or the European countries;
- (t) **“Policies & Guidelines”** means policies, procedures, processes, guidance, protocols, guidelines, directives, instructions, administrative interpretations, circulars or any similar documents of an administrative nature emanating from the Government of Canada and used by the Government of Canada in the application of the Act or of the Regulations, regardless of its actual name and of its availability to the public at any given time;
- (u) **“Regulations”** means the *Immigration and Refugee Protection Regulations*, SOR/2002-227 and its predecessor regulations, including but not limited to the *Immigration Regulations, 1978*, SOR/1978-172, as amended from time to time;
- (v) **“SAWP”** means the Seasonal Agricultural Worker Program launched in 1966, and any subsequent iterations thereof;
- (w) **“SOCI”** means the Standing Senate Committee on Social Affairs, Science and Technology;
- (x) **“SOCI 2024 Report”** means the report entitled “Act Now: Solutions for Temporary and Migrant Labour in Canada”, communicated as Exhibit P-9;
- (y) **“TFWP”** means the Temporary Foreign Worker Program as it evolved from the NIEAP, and any subsequent iterations thereof;
- (z) **“U.N. Special Rapporteur”** means the United Nations Special Rapporteur on contemporary forms of slavery, including its causes and consequences;
- (aa) **“U.N. Special Rapporteur Reports”** means the U.N. Special Rapporteur’s End of Mission Statement and Report, communicated as Exhibit P-12 and P-13.

Where requested Documents are available in part, please provide the available Documents.

Where the applicable period is not otherwise specified below, the Documents are sought for the Class Period. Documents which predate the beginning of the applicable period but continue to apply during the applicable period are also sought.

The Representative Plaintiff reserves its right to request the disclosure of other Documents at a later stage of the proceedings, including in the context of examinations for discovery, in the context of the preparation of the Representative Plaintiff’s expert reports, in light of the defense to be filed by the Defendant, or in light of the Documents transmitted by the Defendant in response to this initial request.

**I. THE SIZE AND COMPOSITION OF THE CLASS<sup>1</sup>**

2. Any Document containing a calculation or estimation of annual numbers of first-time holders of Closed Work Permits.
3. Any Document containing a classification of first-time holders of Closed Work Permits by year and by immigration program or stream, nature or field of employment, country of origin, race, national origin, ethnic origin and/or colour.
4. Any Document containing a calculation or estimation of annual numbers of holders of Closed Work Permits.
5. Any Document containing a classification of holders of Closed Work Permits by year and by immigration program or stream, nature or field of employment, country of origin, race, national origin, ethnic origin and/or colour.
6. Any Document containing a classification of holders of open work permits issued to temporary foreign workers under the International Mobility Program or any previously-existing immigration program or stream, by year and by nature or field of employment, country of origin, race, national origin, ethnic origin and/or colour.
7. Any Document containing a calculation or estimation of annual numbers of Business Visitors or of annual numbers of first-time Business Visitors.
8. Any Document containing a classification of Business Visitors by year and by immigration program or stream, nature or field of employment, country of origin, race, national origin, ethnic origin and/or colour.
9. Any Document containing a calculation or estimation of annual numbers of Domestic Worker of Foreign Representatives or of annual numbers of first-time Domestic Worker of Foreign Representatives.
10. Any Document containing a classification of Domestic Worker of Foreign Representatives by year and by immigration program or stream, country of origin, race, national origin, ethnic origin and/or colour.

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<sup>1</sup> The requests made in this Section remain subject to the outcome of the discussions initiated by the Parties regarding the disclosure of data on the size and composition of the Class and, in particular, whether initial data should be disclosed in the context of this request, or whether all data should instead be disclosed in the context of the preparation of the Representative Plaintiff's expert reports. If the data is repeated in several Documents, the Parties should also discuss means of ensuring complete disclosure while avoiding undue duplication.

11. Any Document containing a calculation or estimation of annual numbers of current or former holders of Closed Work Permits, Business Visitors, or Domestic Workers of Foreign Representatives who were notified to leave Canada and/or deported from Canada.
12. Any Document containing a calculation or estimation of annual numbers of current or former holders of Closed Work Permits, Business Visitors, or Domestic Workers of Foreign Representatives who were assisted by temporary foreign worker recruitment agencies and/or foreign government agents in a process of “voluntary return” to their country of origin before the expiration of their work permit or authorized period of stay in Canada.

## II. **THE ADMINISTRATIVE CONTEXT**

13. All Policies & Guidelines pertaining to the issuance of Closed Work Permits or otherwise stating the immigration programs or streams for which, or other circumstances in which, Closed Work Permits would be issued.
14. All Policies & Guidelines pertaining to consequences of the termination of the employment of holders of Closed Work Permits.
15. All Policies & Guidelines pertaining to Business Visitors.
16. All Policies & Guidelines pertaining to Domestic Workers of Foreign Representatives.
17. All Policies & Guidelines pertaining to the provision of LMIAs or to the appreciation of the conditions to be met or factors to be considered in the provision of a LMIA.<sup>2</sup>
18. All Memoranda of Understanding concluded between Canada and the government of any country participating in the SAWP, including their annexes and in particular, but without limiting the generality of the foregoing, the standard employment agreements outlining the conditions of employment under the SAWP.
19. All Policies & Guidelines pertaining to the assessment of the genuineness of an offer of employment made by a Canadian employer to a foreign national in the context of the

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<sup>2</sup> On September 24, 2024, M<sup>lre</sup> Belley-McKinnon submitted an access to information request to Employment and Social Development Canada for “[a]ny correspondence, instructions, guideline, procedure, directive or other internal document developed by Employment and Social Development Canada and aimed at expediting the treatment of labour market impact assessment applications from Canadian employers seeking to hire temporary foreign workers.” On or around February 11, 2025, M<sup>lre</sup> Belley-McKinnon was provided with redacted documents in response to this request, under file number A-2024-01806. As part of the abovementioned request, we request the disclosure of unredacted versions of the documents which were provided to us.

issuance of a work permit to such foreign national or to the appreciation of the factors to be considered in assessing the genuineness of such an offer.

20. Any Document containing a calculation or estimation of processing delays for LMIA's.
21. Any Document containing a calculation or estimation of processing delays for job offer genuineness assessments.
22. Any Document containing a calculation or estimation of processing delays for applications for Closed Work Permits.
23. All Policies & Guidelines pertaining to human trafficking risks for current or former holders of Closed Work Permits, Business Visitors, or Domestic Workers of Foreign Representatives, or to the conduct of human trafficking investigations involving them as victims.
24. All Policies & Guidelines pertaining to the removal or deportation of current or former holders of Closed Work Permits, Business Visitors, or Domestic Workers of Foreign Representatives.

### **III. THE DESIGNATED MEMBER**

25. All Documents provided by or on behalf of the Designated Member to the Government of Canada between 2014 and 2022, including the Designated Member's applications for work permits, the Designated Member's application for permanent residence and Documents submitted in support thereof or in connection therewith.

### **IV. THE HISTORICAL DEVELOPMENT OF THE PROGRAMS**

26. [...] All (a) Policies & Guidelines; (b) memoranda, instructions, discussion papers, briefing, research or policy papers, reports, analyses, or written correspondence sent or received by an Executive Official or Employee; or (c) minutes or notes of meetings or verbal exchanges involving an Executive Official or Employee, in all cases between 1945 and 1982 and in all cases discussing or otherwise pertaining to:
  - (a) the [...] undesirability of non-white immigration or immigration from Non-Preferred Countries of Origin (including Jamaica and the Caribbean countries);
  - (b) the inability of non-white immigrants or immigrants from Non-Preferred Countries of Origin to assimilate to life in Canada;
  - (c) the unsuitability of non-white immigrants or immigrants from Non-Preferred Countries of Origin to conditions in Canada; or

- (d) risks posed by non-white immigration or immigration from Non-Preferred Countries of Origin in Canada.
27. [...] All (a) Policies & Guidelines; (b) memoranda, instructions, discussion papers, briefing, research or policy papers, reports, analyses, or written correspondence sent or received by an Executive Official or Employee; or (c) minutes or notes of meetings or verbal exchanges involving an Executive Official or Employee, in all cases between 1945 and 1982 and in all cases discussing or otherwise pertaining to the actual or potential temporary migration into Canada of non-white migrants or migrants from Non-Preferred Countries of Origin (including Jamaica and the Caribbean countries) on Closed Work Permits or other forms of employer-specific work authorizations.
28. [...] All (a) Policies & Guidelines; (b) memoranda, instructions, discussion papers, briefing, research or policy papers, reports, analyses, or written correspondence sent or received by an Executive Official or Employee; or (c) minutes or notes of meetings or verbal exchanges involving an Executive Official or Employee, in all cases between 1945 and 1982 and in all cases discussing or otherwise pertaining to the actual or potential issuance of Closed Work Permits or other forms of employer-specific work authorizations to white migrants or migrants from [...] the United States of America, the United Kingdom, New Zealand, Australia or a European country;
29. [...] All (a) Policies & Guidelines; (b) memoranda, instructions, discussion papers, briefing, research or policy papers, reports, analyses, or written correspondence sent or received by an Executive Official or Employee; or (c) minutes or notes of meetings or verbal exchanges involving an Executive Official or Employee, in all cases between 1945 and 1982 and in all cases pertaining to the opportunity or inopportunity or to the risks or benefits of the West Indian Domestic Scheme, or of the employer-specific work requirements under same, including proposals to ministers or to Cabinet in respect of the establishment, development, or termination of the scheme.
30. [...] All (a) Policies & Guidelines; (b) memoranda, instructions, discussion papers, briefing, research or policy papers, reports, analyses, or written correspondence sent or received by an Executive Official or Employee; or (c) minutes or notes of meetings or verbal exchanges involving an Executive Official or Employee, in all cases between 1945 and 1982 and in all cases pertaining to the opportunity or inopportunity or to the risks or benefits of the SAWP, of expanding the SAWP by adding participating countries, or of the Closed Work Permits issued under the SAWP, including proposals to ministers or to Cabinet in respect of the establishment, development or expansion of the SAWP.
31. [...] All (a) Policies & Guidelines; (b) memoranda, instructions, discussion papers, briefing, research or policy papers, reports, analyses, or written correspondence sent

or received by an Executive Official or Employee; or (c) minutes or notes of meetings or verbal exchanges involving an Executive Official or Employee, in all cases between 1945 and 1982 and in all cases pertaining to the opportunity or inopportunity or to the risks or benefits of expanding the applicability of Closed Work Permits in Canada to other immigration programs or streams than the SAWP, including proposals to ministers or to Cabinet in respect of the establishment or development of the NIEAP, TFWP, or any other immigration programs or streams leading to the issuance of Closed Work Permits.

**V. AWARENESS OF THE HARMFUL IMPACTS OF EMPLOYER-TYING MEASURES BY THE DEFENDANT**

32. [...] All complaints, denunciations or submissions received by the Government of Canada since 1966 regarding:

- (a) the restricted capacity of current or former holders of Closed Work Permits, Business Visitors or Domestic Workers of Foreign Representatives to resign or change employers in Canada;
- (b) the power imbalance between such migrant workers and their employers in Canada;
- (c) the vulnerability of such migrant workers to exploitation, abuse or human and labour rights violations, or exploitation, abuse or human and labour rights violations suffered by such migrant workers, including but not limited to:
  - i) financial abuses (predatory loans, wage theft, non-payment of wages, late payment of wages, underpayment of wages, illegal deductions or fees);
  - ii) employer control over movements or over social interactions;
  - iii) unsafe working conditions, such as hazardous tasks, exposure to physical or chemical hazards, exposure to extreme weather, lack of personal protective equipment, exposure to faulty or broken equipment or machinery, inadequate training, unsafe transportation methods, unsustainable productivity targets, excessive working hours, and insufficient breaks and periods of rest;
  - iv) work-related accidents, injuries, illnesses or death;
  - v) experiencing poor living conditions, including inadequate, unsanitary, overcrowded or poorly-maintained accommodation, inadequate

nutrition, lack of access to clean drinking water, lack of access to sanitation facilities, sleep deprivation, and lack of privacy;

vi) experiencing discrimination, intimidation or psychological harassment;

vii) physical violence or assault;

viii) sexual harassment, sexual assault or rape;

ix) chronic fatigue, stress and mental health issues, including depression and anxiety disorders;

x) substance use disorders;

xi) experiencing situations of illegal or undocumented work or of irregular status; and

xii) becoming a victim of human trafficking, debt bondage, or other forms of modern slavery; or

(d) other negative consequences for such migrant workers of their restricted capacity to resign or change employers in Canada, including but not limited to:

i) a loss of access (or delay in access) to health coverage;

ii) a loss of access (or delay in access) to permanent legal status;

iii) a loss of access (or delay in access) to legal status for family members,

iv) deportation risks upon termination of their employment;

v) a restricted freedom of movement;

vi) a restricted access to social interactions or social isolation;

vii) a restricted access to potential assistance, including community networks and support networks such as legal clinics or unions;

viii) a restricted access to health and social services;

ix) a restricted access to health and social benefit programs or deprivation of the benefits of these programs;

x) a restricted capacity to assert their legal rights and to seek redress for the violation of such rights through administrative or judicial processes.

33. All Documents generated, issued or received by or exchanged within the Government of Canada since 1966 [...] discussing [...] the exposure of current or former holders of Closed Work Permits, Business Visitors or Domestic Workers of Foreign Representatives [...] to any of the consequences described above in paragraphs 32(a), 32(b), 32(c) or 32(d) hereof or the fact that such migrant workers suffer(ed) any of such consequences.
- 33.1. Incident reports, investigation reports, inspection reports, evaluation reports, or inspection services evaluation reports generated, issued or received by or exchanged within the Government of Canada since 1966 in respect of instances of exploitation, abuse, human or labour rights violations (including those listed in paragraph 32(c) above) or other negative consequences (including those listed in paragraph 32(d) above) suffered by current or former holders of Closed Work Permits, Business Visitors or Domestic Workers of Foreign Representatives.
- 33.2. Incident reports, investigation reports, inspection reports, evaluation reports, or inspection services evaluation reports generated, issued or received by or exchanged within the Government of Canada since 1982 in respect of failures by employers of holders of Closed Work Permits to comply with LMIA conditions.
34. [...] All (a) Policies & Guidelines; (b) memoranda, instructions, discussion papers, briefing, research or policy papers, reports, analyses, or written correspondence sent or received by an Executive Official or Employee; or (c) minutes or notes of meetings or verbal exchanges involving an Executive Official or Employee, in all cases since 1966 and in all cases discussing proposed changes to the Act, to the Regulations, to Policies & Guidelines or to immigration programs or streams as a result of [...] the exposure of current or former holders of Closed Work Permits, Business Visitors or Domestic Workers of Foreign Representatives to any of the consequences described above in paragraphs 32(a), 32(b), 32(c) or 32(d) hereof, whether or not such proposed changes were implemented.
35. Independent study commissioned by Employment and Social Development Canada in August 2018 as part of its ongoing review of the Agricultural stream of the TFWP to assess current housing standards and provide recommendations for how to develop national requirements for workers' housing.
36. [...] All complaints, denunciations or submissions received by the Government of Canada regarding (a) the downward pressure on working conditions in Canada arising from Canadian employers' reliance on Closed Work Permits; (b) the existence of an incentive for Canadian employers to replace Canadian citizen or permanent resident workers by holders of Closed Work Permits; or (c) obstacles created by Closed Work Permits to holding abusive employers accountable.

37. All Documents generated, issued or received by or exchanged within the Government of Canada [...] discussing [...] any of the subjects described above in paragraphs 36(a), 36(b) or 36(c) hereof.
38. [...] All (a) Policies & Guidelines; (b) memoranda, instructions, discussion papers, briefing, research or policy papers, reports, analyses, or written correspondence sent or received by an Executive Official or Employee; or (c) minutes or notes of meetings or verbal exchanges involving an Executive Official or Employee, in all cases discussing proposed changes to the Act, to the Regulations, to Policies & Guidelines or to immigration programs or streams as a result of Canadian employers' reliance on Closed Work Permits or the impact of their reliance on Canadian workers, permanent residents and/or the Canadian labour market, or as a result of [...] any of the subjects described above in paragraphs 36(a), 36(b) or 36(c) hereof, whether or not such proposed changes were implemented.

## **VI. PARLIAMENTARY AND U.N. SPECIAL RAPPORTEUR REPORTS<sup>3</sup>**

39. Any evidence or submissions presented by the Government of Canada to CIMM in the context of the work which led to the CIMM 2009 Report.
40. Any response of the Government of Canada to the CIMM 2009 Report and any Documents discussing or otherwise pertaining to the elaboration of this response and/or the implementation of the recommendations of the CIMM 2009 Report.
41. Any evidence or submissions presented by the Government of Canada to HUMA in the context of the work which led to the HUMA 2016 Report.
42. Any response of the Government of Canada to the HUMA 2016 Report and any Documents discussing or otherwise pertaining to the elaboration of this response and/or the implementation of the recommendations of the HUMA 2016 Report.
43. Any evidence or submissions presented by the Government of Canada to CIMM in the context of the work which led to the CIMM 2021 Report.
44. Any response of the Government of Canada to the CIMM 2021 Report and any Documents discussing or otherwise pertaining to the elaboration of this response and/or the implementation of the recommendations of the CIMM 2021 Report.

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<sup>3</sup> Some of the Documents sought in this section have already been made public by the House of Commons or Senate of Canada. The requests made in this section are made for completeness purposes only, and are to be discussed by the Parties.

45. Any evidence or submissions presented by the Government of Canada to CIMM in the context of the work which led to the CIMM 2024 Report.
46. Any response of the Government of Canada to the CIMM 2024 Report and any Documents discussing or otherwise pertaining to the elaboration of this response and/or the implementation of the recommendations of the CIMM 2024 Report.
47. Any evidence or submissions presented by the Government of Canada to SOCI in the context of the work which led to the SOCI 2024 Report.
48. Any response of the Government of Canada to the SOCI 2024 Report and any Documents discussing or otherwise pertaining to the elaboration of this response and/or the implementation of the recommendations of the SOCI 2024 Report.
49. Any evidence or submissions presented by the Government of Canada to the U.N. Special Rapporteur in the context of the work which led to the U.N. Special Rapporteur Reports.
50. Any response of the Government of Canada to the U.N. Special Rapporteur Reports and any Documents discussing or otherwise pertaining to the elaboration of this response and/or the implementation of the recommendations of the U.N. Special Rapporteur Reports.

## **VII. OPEN WORK PERMITS FOR VULNERABLE WORKERS**

51. All Documents, including any policy analysis, discussing or otherwise pertaining to the proposed creation of open work permits for vulnerable workers, including all Documents containing the “*thorough analysis of the advantages and disadvantages associated with employer-specific work permits*” undertaken by the Government of Canada, mentioned in the regulatory impact analysis statement communicated as Exhibit P-14.
52. All Documents containing comments received in respect of the proposed *Regulations Amending the Immigration and Refugee Protection Regulations* republished in the Canada Gazette, Part I, on December 15, 2018, whether in writing or in the context of consultations.
53. All Policies & Guidelines pertaining to the issuance of open work permits for vulnerable workers.
54. Any Document containing a calculation or estimation of annual numbers of applications for open work permits for vulnerable workers received and/or of annual numbers of such applications that were granted, dismissed, or which were not processed to their conclusion.

55. Any Document containing a calculation or estimation of processing delays for applications for open work permits for vulnerable workers.
56. All Documents generated, issued or received by or exchanged within the Government of Canada containing an assessment of or otherwise pertaining to the effectiveness of open work permits for vulnerable workers.

Montréal, December 4, 2025

*Davies Ward Phillips & Vineberg LLP*

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No. 500-06-001263-231  
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(Class Action Division)  
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**THE CLASS**

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**ASSOCIATION FOR THE RIGHTS OF  
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**BYRON ALFREDO ACEVEDO TOBAR**

Designated Member

v.

**ATTORNEY GENERAL OF CANADA**

Defendant

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**REPRESENTATIVE PLAINTIFF'S  
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FOR THE DISCLOSURE OF DOCUMENTS**

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ORIGINAL

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**DAVIES**

Counsel for the Representative Plaintiff

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