

**CANADA
PROVINCE OF QUÉBEC
DISTRICT OF MONTRÉAL**

**CLASS ACTIONS DIVISION
SUPERIOR COURT**

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

**REPRESENTATIVE PLAINTIFF'S ADDITIONAL (POST-DEFENCE)
REQUEST FOR THE DISCLOSURE OF DOCUMENTS**

TO:

M^{re} Mariève Sirois-Vaillancourt

M^{re} Emilie Tremblay

M^{re} Kim Nguyen

M^{re} Sean Doyle

M^{re} Maria Rodriguez

Department of Justice Canada

Quebec Regional Office

Marieve.Sirois-Vaillancourt@justice.gc.ca

Emilie.Tremblay@justice.gc.ca

Kim.Nguyen@justice.gc.ca

Sean.Doyle@justice.gc.ca

Maria.Rodriguez2@justice.gc.ca

NotificationPGC-AGC.Civil@justice.gc.ca

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.

Subject to the below, for the purposes of this request, the capitalized terms have the meanings ascribed to them in the *Representative Plaintiff's Particularized Initial Request for the Disclosure of Documents* dated December 4, 2025 (the "**Initial Request**").

Given the allegations of the Defence, the Representative Plaintiff hereby modifies the definition of "**Policies & Guidelines**" as follows, for the purposes both of the Initial Request and of the present request:

(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 or in the purported exercise of a royal prerogative over international or foreign affairs, regardless of its actual name and of its availability to the public at any given time;

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 particulars provided in response to the *Representative Plaintiff's Application for Particulars*, or in light of Documents transmitted in response to the Initial Request or to this request.

The additional documents sought are the following:

57. All Policies & Guidelines included in the "*policies, procedures and guidelines*" referred to at paragraph 42 of the Defence and not otherwise included in the Initial Request or in the present request, if any.
58. Any Document assessing the length of Business Visitors' stay in Canada or the nature of their activities in Canada, otherwise than on an individual basis.
59. Any Document evidencing decisions made by the Government of Canada in the purported exercise of a royal prerogative over international or foreign affairs and

pertaining to the establishment of the DWAP or to the evolution of its terms, including the obligations imposed on Domestic Workers of Foreign Representatives.

60. 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 pertaining to the opportunity or inopportunity or to the risks or benefits of the DWAP, of the obligation for Domestic Workers of Foreign Representatives to live in the foreign representative's household, of the prohibition from working for more than one employer at a time, or of the requirement of the express consent of the Office of Protocol to employer transfers, including proposals to ministers or to Cabinet in respect of the modification of the DWAP or such obligation, prohibition or requirement.
61. All Policies & Guidelines pertaining to the issuance of the Office of Protocol's consent to employer transfers by Domestic Workers of Foreign Representatives.
62. Any Document containing a calculation or estimation of annual numbers of applications received for the Office of Protocol's consent to employer transfers by Domestic Workers of Foreign Representatives and/or of annual numbers of such applications that were granted, dismissed, or which were not processed to their conclusion.
63. Any Document containing a calculation or estimation of processing delays for applications for the Office of Protocol's consent to employer transfers by Domestic Workers of Foreign Representatives.
64. All Policies & Guidelines pertaining to changes of employers by holders of Closed Work Permits and to the issuance of new work permits to such holders in such context within Canada, including but not limited to the *Changing Employers Temporary Public Policy* referred to at paragraph 124 of the Defence.
65. Any Document containing a calculation or estimation of annual numbers of applications for new work permits received from holders of Closed Work Permits seeking to change employers within Canada and/or of annual numbers of such applications that were granted, dismissed, or which were not processed to their conclusion.
66. Any Document containing a calculation or estimation of processing delays for applications for new work permits received from holders of Closed Work Permits seeking to change employers within Canada.
67. All Policies & Guidelines pertaining to the inspections referred to at paragraph 181 of the Defence ("**Inspections**") or to the imposition of the administrative monetary

penalties or other consequences or enforcement action referred to at paragraph 183 of the Defence (collectively, "**Measures**").

68. Any Document containing a calculation or estimation of annual numbers of Inspections performed by the Government of Canada.
69. Any Document containing a calculation or estimation of annual numbers of each type of Measure imposed by the Government of Canada.
70. All Documents generated, issued or received by or exchanged within the Government of Canada containing an assessment of or otherwise pertaining to the effectiveness, efficiency or costs of Inspections and Measures to deter non-compliance with the regulatory conditions referred to at paragraphs 181 to 183 of the Defence.
71. All Policies & Guidelines pertaining to the confidential tip line and online reporting tool referred to at paragraph 185 of the Defence.
72. All Documents generated, issued or received by or exchanged within the Government of Canada containing an assessment of or otherwise pertaining to the effectiveness, efficiency or costs of the confidential tip line and online reporting tool referred to at paragraph 185 of the Defence.
73. All Policies & Guidelines pertaining to the Migrant Worker Support Program referred to at paragraph 186 of the Defence.
74. All Documents generated, issued or received by or exchanged within the Government of Canada containing an assessment of or otherwise pertaining to the effectiveness, efficiency or costs of the Migrant Worker Support Program referred to at paragraph 186 of the Defence.
75. All Documents generated, issued or received by or exchanged within the Government of Canada containing an assessment of or otherwise pertaining to the feasibility or effects of issuing open work permits to migrant workers instead of Closed Work Permits, including but not limited to the effects alleged at paragraphs 194 to 197 and 201 of the Defence.
76. All Documents generated, issued or received by or exchanged within the Government of Canada containing an assessment of or otherwise pertaining to the feasibility or effects of alternatives to the admission of migrant workers under Closed Work Permits other than the issuance of open work permits, including but not limited to immigration selection and permanent status recognition programs, and reliance on government or non-profit organizations as official sponsors.

Montréal, March 12, 2026

Davies Ward Phillips & Vineberg LLP

DAVIES WARD PHILLIPS & VINEBERG LLP
Counsel for the Representative Plaintiff

M^{tre} Jean-Philippe Groleau

M^{tre} Guillaume Charlebois

M^{tre} Alexandra Belley-McKinnon

M^{tre} Aliosha Hurry

1501 McGill College Avenue, 27th Floor

Montréal (Québec) H3A 3N9

Tel. : 514.841.6583 (M^{tre} Groleau)

514.841.6404 (M^{tre} Charlebois)

514.841.6456 (M^{tre} Belley-McKinnon)

514.807.1373 (M^{tre} Hurry)

Email: jpgroleau@dwpv.com

gcharlebois@dwpv.com

abelleymckinnon@dwpv.com

ahurry@dwpv.com

File : 287026

No. 500-06-001263-231
SUPERIOR COURT
(Class Actions Division)
District of Montréal

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

**REPRESENTATIVE PLAINTIFF'S ADDITIONAL
(POST-DEFENCE) REQUEST FOR THE
DISCLOSURE OF DOCUMENTS**

ORIGINAL

DAVIES

Counsel for the Representative Plaintiff

M^{re} Jean-Philippe Groleau

M^{re} Guillaume Charlebois

M^{re} Alexandra Belley-McKinnon

M^{re} Alisha Hurry

T 514.841.6583 / 6404 / 6456 /

514.807.1373

jpgroleau@dpvp.com

gcharlebois@dpvp.com

abelleymckinnon@dpvp.com

ahurry@dpvp.com

File 287026

1501 McGill College Avenue, 27th floor
Montréal, QC H3A 3N9
Canada

T 514.841.6400

F 514.841.6499