CANADA

PROVINCE OF QUÉBEC
DISTRICT OF MONTRÉAL
N°: 500-06-001426-259

SUPERIOR COURT
(Class Action)

Chloé Sabourin, natural person, domiciled and r[redacted]

APPLICANT

v.

OpenAI, Inc., legal person having its head office at 2711 Centerville Road, Suite 400, Wilmington, New Castle County, Delaware 19808, carrying on business through its registered agent, The Corporation Trust Company, located at 1209 Orange Street, Wilmington, New Castle County, Delaware 19801.

OpenAI Global, LLC., legal person having its head office at 251 Little Falls Drive, Wilmington, New Castle County, Delaware 19808, carrying on business through its registered agent, The Corporation Trust Company, located at 1209 Orange Street, Wilmington, New Castle County, Delaware 19801.

OpenAI GP, L.L.C., legal person having its head office at 251 Little Falls Drive, Wilmington, New Castle County, Delaware 19808, carrying on business through its registered agent, The Corporation Trust Company, located at 1209 Orange Street, Wilmington, New Castle County, Delaware 19801.

OpenAI HoldCo, LLC., legal person having its head office at 251 Little Falls Drive, Wilmington, New Castle County, Delaware 19808, carrying on business through its registered agent, The Corporation Trust Company, located at 1209 Orange Street,

Wilmington, New Castle County, Delaware 19801.

OpenAI Holdings, LLC., legal person having its head office at 251 Little Falls Drive, Wilmington, New Castle County, Delaware 19808, carrying on business through its registered agent, The Corporation Trust Company, located at 1209 Orange Street, Wilmington, New Castle County, Delaware 19801.

OpenAI OpCo, LLC., legal person having its head office at 251 Little Falls Drive, Wilmington, New Castle County, Delaware 19808, carrying on business through its registered agent, The Corporation Trust Company, located at 1209 Orange Street, Wilmington, New Castle County, Delaware 19801.

OAI CORPORATION, legal person having its head office at au 251 Little Falls Drive, Wilmington, New Castle County, Delaware 19808, carrying on business through its registered agent, The Corporation Trust Company, located at 1209 Orange Street, Wilmington, New Castle County, Delaware 19801.

OpenAI Startup Fund GP I, L.L.C., legal person having its head office at 251 Little Falls Drive, Wilmington, New Castle County, Delaware 19808, carrying on business through its registered agent, The Corporation Trust Company, located at 1209 Orange Street, Wilmington, New Castle County, Delaware 19801.

OpenAI Startup Fund I, L.P., legal person having its head office at 251 Little Falls Drive, Wilmington, New Castle County, Delaware 19808, carrying on business through its

registered agent, The Corporation Trust Company, located at 1209 Orange Street, Wilmington, New Castle County, Delaware 19801.

OpenAI Startup Fund Management, LLC., legal person having its head office at 251 Little Falls Drive, Wilmington, New Castle County, Delaware 19808, carrying on business through its registered agent, The Corporation Trust Company, located at 1209 Orange Street, Wilmington, New Castle County, Delaware 19801.

DEFENDANTS

AMENDED APPLICATION TO AUTHORIZE THE BRINGING OF A CLASS ACTION AND TO APPOINT THE STATUS OF REPRESENTATIVE APPLICANT
(ART. 574 AND FOLLOWING C.C.P.)

TO (…) THE HONOURABLE CATHERINE PICHÉ, J.S.C., JUDGE DESIGNATED TO HEAR ALL PROCEEDINGS RELATING TO THE PRESENT CLASS ACTION, THE APPLICANT RESPECTFULLY SUBMITS AS FOLLOWS:

I. OVERVIEW

1. The Applicant seeks authorization to institute a class action on behalf of the following class of which she is a member:

   All persons domiciled in the province of Quebec, holders of a copyright within the meaning of the *Copyright Act* (R.S.C. 1985, c. C-42) in an artistic work, whose works were used without authorization by the defendants to develop, train and/or commercialize their artificial intelligence models since October 19, 2023, or any other group to be determined by the court.

2. Copyright in Canada exists to protect and encourage artistic creation by granting creators exclusive rights to their works and ensuring they can receive fair compensation for their use ;

3. These legal protections promote the creation and sharing of artistic works in a democratic country, where human value is also realized through the protection of one's property rights, including the right to the valuation of their works, while prohibiting the unauthorized exploitation of these works by others ;

4. OpenAI is an American artificial intelligence research and development company, founded in 2015 and based in San Francisco, whose initial mission was to develop general artificial intelligence beneficial to humanity ;

5. The Defendants have developed and operate DALL·E 3, a commercial artificial intelligence system that generates images based on user prompts (text queries) ;

6. Among OpenAI's models for generating visual content is also Sora, a tool that produces images, short videos, and animations based on text descriptions or modified images ;

7. DALL·E 3 is integrated into OpenAI's products and services, including ChatGPT, and is offered on the platform in both paid and free versions ;

8. The Defendants derive substantial revenue from DALL·E 3 and associated tools, including through indirect subscriptions such as ChatGPT Plus, which incorporate these generative features ;

9. The image and video generation capabilities of DALL·E 3 and Sora rely on training data that includes large volumes of copyrighted visual works ;

10. The image and video generation capabilities of OpenAI's models, including DALL·E 3 and Sora, depend on the large-scale ingestion of visual data gathered from the Internet. These datasets necessarily encompass vast quantities of copyrighted material. Moreover, academic and technical research has highlighted that models such as DALL·E 3 can circumvent watermarking and other protective measures, enabling them to replicate images and videos that closely resemble original protected works ;

11. The widespread deployment of AI-generated images and videos threatens to replace authentic artistic work, undermining the livelihoods of Canadian creators ;

12. Each of the acts mentioned above constitutes a deliberate and unlawful violation of the members' rights to integrity and dignity (Article 4), as well as to the free enjoyment and disposal of their property (Article 6), in accordance with the *Charter of Human Rights and Freedoms,* R.S.Q., c. C-12 (the "**Charter**") ;

II. PARTIES

A. Applicant

13. The Plaintiff, Chloé Sabourin, is a visual artist and painter from Montreal, born in 1993, who divides her time between the city and the Laurentians, in Saint-Sauveur, Quebec ;

14. Chloé Sabourin has nurtured her creativity since childhood, influenced by her stays in Montreal, New York, Paris, and the Caribbean, as well as by her mother, an art collector ;

15. She trained in artistic techniques at Cégep Jean-de-Brébeuf in Arts, Letters, and Communications, then completed a Bachelor of Laws at the University of Sherbrooke in 2016 and was admitted to the Quebec Bar ;

16. Despite family encouragement to pursue a stable career, she persisted in her artistic path, earning a master's degree in arts management in Paris and holding her first exhibition in 2014 at *Believe in Art* at La Cenne in Montreal ;

17. Having settled in the Laurentians about a year ago, she now balances her artistic career with part-time legal practice to maintain a stimulating equilibrium. She also founded Arthlo, an art consulting firm that promotes artistic investment among emerging artists ;

18. With over fifteen years of professional experience selling paintings and a significant Instagram following of approximately 17,000 followers, her exhibitions include Carré des Artistes in Griffintown since 2017, as well as events in Montreal, Toronto, Los Angeles, and New York, marking her growing recognition on both the Canadian and international art scenes, as evidenced by **Exhibit P-1** ;

19. Her works, which are colorful, feminist, and minimalist, play with colors, textures, and forms in a figurative style. They focus on feminine themes, nature, and emotions, as shown in **Exhibit P-1.1** ;

B. Defendants

20. OpenAI is a private, for-profit company in the field of artificial intelligence, offering various products and services for individuals as well as businesses, all based on its proprietary GPT models.

21. OpenAI consists of a set of interconnected entities, including OpenAI, Inc.; OpenAI GP, LLC; OpenAI, LLC; OpenAI Startup Fund I, LP; OpenAI Startup Fund GP I, LLC; OpenAI Startup Fund Management, LLC; OpenAI Global, LLC; OpenAI OpCo, LLC; OAI Corporation; and OpenAI Holdings, LLC (collectively referred to as "**OpenAI**" or the "**OpenAI Entities**" or the "**Defendant**") ;

22. All of these OpenAI Entities are incorporated in Delaware, with their headquarters located in California. Screenshots of the Delaware Division of Corporations' registry pages for these companies are provided as **Exhibit P-2** ;

23. The OpenAI Entities, acting together in pursuit of their interests, have partnered to finance, develop, and commercialize the GPT models. These models have been deliberately designed and operated in blatant violation of copyright and contractual commitments of media companies. These maneuvers, carefully concealed and known only to the OpenAI Entities, directly involve each of them in the reprehensible acts alleged ;

a. The defendant OpenAI, Inc. is a nonprofit entity created in 2015. It owns and/or exercises direct or indirect control over all the other OpenAI Entities ;

b. The defendant OpenAI GP, LLC is a limited liability company established in 2018 (previously known as Summersafe GP, LLC, a limited liability company formed in 2018) ;

c. The defendant OpenAI, LLC is a limited liability company founded in 2020 ;

d. Three entities related to the OpenAI Startup Fund serve as defendants, all created in 2021: OpenAI Startup Fund I, LP is a limited partnership; OpenAI Startup Fund GP I, LLC is a limited liability company; OpenAI Startup Fund Management, LLC is a limited liability company ;

e. The defendant OpenAI Global, LLC is a limited liability company incorporated in 2022 ;

f. The defendant OpenAI OpCo, LLC is a limited liability company existing since 2023 (formerly known as OpenAI, LP, itself previously Summersafe LP, a limited partnership formed in 2018) ;

g. The defendant OAI Corporation is a corporation incorporated in September 2023 (formerly OAI Corporation, LLC, a limited liability company created in March 2023 and incorporated by OpenAI Holdings, LLC) ;

h. The defendant OpenAI Holdings, LLC is a limited liability company formed in 2023 ;

24. The comprehensive details concerning the role of each OpenAI Entity in the wrongful acts mentioned in this application are exclusively within the knowledge and control of the OpenAI Entities ;

III. THE DEFENDANTS' POPULAR MODELS

25. ChatGPT, based on GPT models (from GPT-2 to GPT-5), is a conversational assistant launched in November 2022. It reached 100 million users in just two months, largely due to fine-tuning through RLHF. This technology provides it with advanced capabilities for targeted internet browsing and information processing, comparable to certain human cognitive functions ;

26. The DALL·E series (from 2021 to DALL·E 4o in 2024) generates photorealistic images from text prompts using diffusion and CLIP, integrated into ChatGPT Plus/Pro with features such as inpainting, as it appears from an article titled "*GLIDE: Towards Photorealistic Image Generation and Editing with Text-Guided Diffusion Models*", communicated as **Exhibit P-3** ;

27. DALL·E can produce images imitating protected works, despite safeguards, creating risks of copyright infringement ;

28. Launched in February 2024 and publicly available since December 2024 with updates in 2025, Sora generates realistic 20-second 1080p videos from text, images, or videos, combining DALL·E and GPT for creative tools, as described in the article "*Sora is here*" filed in support of this claim as **Exhibit P-4**. Trained on data that includes protected content, it frequently reproduces copyrighted styles and characters despite filters ;

III.1 TECHNICAL MECHANISM: MEMORIZATION AND EXTRACTION

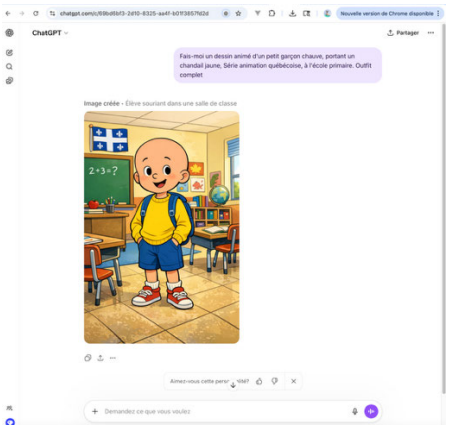
28.1 The operational reality of these models, however, contradicts the narrative of autonomous artificial "creativity." Beyond their user interfaces, the image and video generation capabilities of DALL·E 3 and Sora do not stem from an abstract understanding of concepts, but rather from a sophisticated process of statistical extraction ;

28.2 Scientific evidence confirms that these systems operate through specific mechanical triggers that allow for the near-perfect reconstruction of protected works, as shown by **Exhibit P-4.1** ;

28.3 The mechanical nature of this memorization is factually demonstrated when the model is provided with a purely technical and generic description, absent of any proprietary names ;

28.4 As shown below, a prompt describing only "a bald little boy, yellow sweater, blue shorts, and red shoes" triggers the immediate and precise extraction of the protected character Caillou ;

The submitted prompt (test):



Caillou and his cat, photo from *La Presse*

28.5 AI does not rely on a single method of reproduction (such as simple general statistics): several interconnected mechanisms explain why it can regenerate elements that are very close to, or even identical to, specific images from its training data ;

28.6 It was trained on a massive corpus of images; from this, it extracted and learned various visual and stylistic structures. In certain cases, it can reproduce elements that are nearly identical to specific images due to a phenomenon known as partial memorization of the training data ;

28.7 Contrary to popular belief, the artificial intelligence system does not perform a simple search in an existing image database: it generates new content based on statistical patterns learned during its training phase (Popular Method 1) ;

28.8 However, numerous scientific studies have demonstrated that effective memorization can occur, leading at times to the quasi-literal "regurgitation" of elements drawn from the initial dataset (Popular Method 1) ;

28.9 These two phenomena are not mutually exclusive; they coexist and intermingle. In reality, the faithful reproduction of characters such as Mario, or Pikachu often relies on a combination of several mechanisms, as shown by **Exhibit P-4.2** ;

28.10 Again, extensive scientific research has proven that effective memorization can occur, resulting in the near-literal regurgitation of components from the original training set ;

28.11 The landmark study *"Extracting Training Data from Diffusion Models"* (2023), conducted by researchers from Google, DeepMind, ETH Zurich, and Princeton, provides formal proof: image generation models like Stable Diffusion or Midjourney do not merely "understand" abstract concepts, they sometimes memorize entire images (real people's faces, protected logos, etc.) when these images appear repeatedly and frequently in the training data ;

28.12 The digital ubiquity of a character like Mario leads to high-fidelity encoding within the model, reaching the point of quasi-photographic memorization of his distinctive features (blue shorts, red shoes, tricycle), as shown by **Exhibit P-4.3** ;

28.13 The FID score of 2.9 of the OpenAI-DDPM architecture mathematically confirms this capability: the AI does not create an original work, but rather extracts a pixel configuration that is statistically inseparable from the protected work, proving that the model has "memorized" the character instead of simply being inspired by it ;

28.14 The study *"Fantastic Copyrighted Beasts and How (Not) to Generate Them"* (ICLR 2025) demonstrates that the DALL·E 3 model has indelibly memorized protected characters ;

28.15 To mask these reproductions, OpenAI utilizes GPT-4 to rewrite user prompts in real-time to avoid "forbidden" terms. This measure only reduces the risk by 50%. In the remaining half of cases, the protected character appears regardless ;

28.16 The model "knows" the original work so well that it does not require the character's name to copy it; a minimal physical description is sufficient, as shown by **Exhibit P-4.4** ;

28.17 The authors conclude that OpenAI's rewriting strategy is "far from perfect." To truly protect authors, OpenAI would need to employ more radical techniques, such as negative prompting (the forced exclusion of specific physical traits), which it chooses not to implement exhaustively ;

28.18 Another major work, the report *"Copyright and Artificial Intelligence, Part 3: Generative AI Training"* by the U.S. Copyright Office (pre-publication, May 2025), examines in depth the use of protected works to train generative AI models ;

28.19 It concludes that this practice is not categorically covered by fair dealing, that massive copying to create competing outputs often exceeds established limits, and that the market factor (potential dilution) weighs heavily against it ;

28.20 The report also highlights that current technical safeguards remain insufficient against substantial reproduction and calls for a case-by-case analysis rather than a general exemption for commercial training ;

28.21 Finally, the vast majority of the incriminated models rely on the LAION-5B dataset, a massive collection of 5 billion image-text pairs automatically collected from the web ;

28.22 Independent audits, notably those conducted by the group *Spawning*, have revealed that this database contains millions of copyrighted images, artworks without creator consent, private photos, and even sensitive documents ;

28.23 If the character's name and appearance have been associated tens or hundreds of thousands of times with similar images in LAION-5B, the model develops an extremely

strong statistical link: a simple physical description (bald little boy, etc.) is then sufficient to activate the corresponding neural weights and generate a very faithful version of the original character ;

IV. VISUAL GENERATIVE ARTIFICIAL INTELLIGENCE MODELS AND THEIR FUNDAMENTAL TRAINING DATA

A. Foundational Datasets: WIT and Common Crawl

29. The WebImageText (WIT) dataset, introduced by OpenAI in 2021, constitutes the main corpus used to train the CLIP (Contrastive Language-Image Pre-training) model. It was constructed from data automatically collected via Common Crawl, a massive archive of public web content (see **Exhibit P-5**) ;

30. According to OpenAI's paper, *Learning Transferable Visual Models From Natural Language Supervision* (Radford et al., 2021), WIT contains approximately 400 million image-text pairs extracted from Common Crawl. These pairs were selected using 500,000 textual queries to capture a wide diversity of visual concepts ;

    The paper specifies:

    "To attempt to cover as broad a set of visual concepts as possible, we search for (image, text) pairs as part of the construction process whose text includes one of a set of 500,000 queries. We approximately class balance the results by including up to 20,000 (image, text) pairs per query. The resulting dataset has a similar total word count as the WebText dataset used to train GPT-2. We refer to this dataset as WIT for WebImageText."

31. Common Crawl is a public web archive that automatically collects content (images, texts such as alt-texts or captions) from websites accessible on the Internet ;

32. According to the official overview of Common Crawl (**Exhibit P-6**), this archive includes works protected by copyright, often distributed under the principle of fair use in the United States, but without a systematic mechanism to filter or exclude these protected contents ;

33. The WIT dataset, derived from Common Crawl, has not undergone thorough organization or verification, unlike the data curation practices described by IBM (**Exhibit P-7**). According to IBM, curation involves organizing, enriching, and managing data to make it accessible, reliable, and reusable, while respecting rules such as those regarding copyright ;

34. No indication is provided regarding controls to identify or exclude content protected by copyright, which exposes WIT to risks of including unauthorized data ;

35. Furthermore, WIT remains inaccessible to the public. The public document on OpenAI by authors such as Radford et al., 2021, provides no access to the dataset, only to the CLIP model, limiting the ability to examine its content or verify its compliance ;

36. This opacity is also highlighted in neutral academic discussions, such as on OpenAI's GitHub, where independent contributors note:

> *"… we constructed a new dataset of 400 million (image, text) pairs collected from a variety of publicly available sources on the Internet […] The authors did not publish the full 400M CLIP dataset due to the dataset's proprietary nature, which is owned by OpenAI. However, they provided key insights and partial data reconstructions based on their research."*
>
> (Source: https://github.com/openai/CLIP/issues/254), **Exhibit P-7.1**

37. This lack of rigorous curation and transparency, combined with the absence of mechanisms to filter protected works, suggests that WIT contains copyrighted content collected without explicit authorization ;

B. CLIP: The Core Multimodal Model

38. Launched in 2021, CLIP (Contrastive Language–Image Pre-training) is a multimodal model that learns to associate images and texts by training on WIT. This model serves as a key foundation for subsequent AI systems, as appears from **Exhibit P-8** ;

39. CLIP's training directly relies on WIT, meaning its capabilities stem from the massive corpus of image–text pairs collected from Common Crawl without copyright filtering.

40. The preprint of Radford et al. highlights zero-shot transfer performance but omits any discussion of copyright implications in the training data ;

C. Datasets Derived from Common Crawl: LAION-5B

41. LAION-5B, released in 2022, is an open-source dataset containing 5.85 billion image–text pairs. The data is sourced from Common Crawl. Instead of storing the actual images, the dataset provides URLs together with associated text descriptions, as shown in **Exhibit P-9** ;

42. The authors of LAION-5B explicitly acknowledge that the dataset is uncurated and unfiltered and that it contains copyrighted content ;

43. They write:

> *"As LAION tools empower people to discover problematic personal or copyrighted content available in the public internet"* and *"the uncurated nature*

of the dataset means that collected links may lead to strongly discomforting and disturbing content."

44. Because LAION-5B is derived from Common Crawl and is expressly acknowledged as unfiltered, and because WIT relies on the same methodology described by collaborators, it follows that WIT necessarily shares this unfiltered character and incorporates protected works ;

45. The LAION-400M dataset, introduced in a blog post published on the LAION website on 20 August 2021 at https://laion.ai/blog/laion-400-open-dataset/, constitutes a clear violation of copyright law because of the way it collects and distributes protected content. The dataset is built from data extracted from Common Crawl, a massive dump of public web pages. It scrapes image–text pairs from random websites that were crawled between 2014 and 2021, as shown in **Exhibit P-10** ;

46. Although the authors of the LAION-400M dataset claim to have implemented partial filtering and data anonymization, they nevertheless distribute exhaustive metadata, including the URLs of the images, their associated captions, and the embeddings generated by the CLIP model. This facilitates the direct location and exploitation of works protected by copyright without the prior authorization of the rights holders ;

47. These image-text pairs, extracted from Common Crawl web data dumps originating from random web pages crawled between 2014 and 2021, encompass images and texts subject to copyright. They are redistributed in a form that includes, notably, a 10 TB web dataset containing 256×256 pixel resized images, captions, and metadata, intended for internal use and requiring users to redownload the images due to licensing constraints, which allows for their immediate use in training artificial intelligence models ;

48. The metadata files in Parquet format, totaling 50 GB, are distributed under the Creative Commons CC-BY 4.0 license without notable restriction, while the images themselves fully retain their original copyright protection ;

"A 10TB webdataset with 256×256 images, captions and metadata. It is a full version of the dataset that can be used directly for training (this one is for internal use, you need to redownload images yourself due to licensing issues)."

49. This passage explicitly indicates that the images are protected by copyright, yet the dataset renders them accessible and usable through the provided URLs and tools, without any appropriate licensing. This constitutes an infringement of copyright through indirect reproduction and the unlawful facilitation of access to protected works ;

D. Built on These Datasets

50. The model powers a series of OpenAI image generation and processing systems. These systems are trained on massive corpora of image–text pairs scraped from the

web, which often include protected content. They rely on the model's ability to associate text and visuals, using datasets derived from WIT and similar large-scale methods ;

51. **GLIDE**, released in 2021, is a text-to-image diffusion system that uses the model for guidance and inpainting. It was trained on approximately 250 million filtered image–text pairs collected from the internet. Nichol and collaborators describe how the model is used to guide the generation of realistic images based on textual descriptions. The dataset is web-scale, and no details are provided on copyright filtering, as shown in **Exhibit P-3** ;

52. **DALL·E 2**, released in 2022, is a hierarchical text-conditional generation system that uses latent representations derived from the model. It was trained on about 250 million image–caption pairs from a web-scraped dataset, together with 650 million additional images that include the dataset used to train the model. Ramesh and collaborators confirm the extensive use of embeddings produced by the model for training. Filtering focuses on aesthetic quality and safety, but there is no explicit mention of copyright, as shown in **Exhibit P-11** ;

53. **DALL·E 3**, released in 2023, improves text-to-image generation by using synthetic captions. The training set contains one billion images, and 95 percent of the captions are generated synthetically and conditioned on embeddings from the model. The original dataset of web-scraped image–text pairs is re-captioned to make descriptions more precise. The model's ViT-B/32 variant is used to evaluate similarity between images and captions. No information is provided about copyright filtering, as shown in **Exhibit P-12** ;

54. **GPT-4o**, released in 2024, is a multimodal system that integrates text, image, and audio capabilities. Its vision tower is based on the model, which enables both generation and analysis of visual content, as shown in **Exhibit P-13** ;

55. **Sora** is OpenAI's multimodal model launched in February 2024. It can generate and modify images, as well as create videos up to one minute long from simple text. Based on a diffusion-transformer architecture, it understands and produces both text, image, and video. It was trained on billions of images and millions of hours of video collected from the web, with synthetic captions to improve accuracy. Sora extends the capabilities of DALL·E and GPT-4o by adding video generation while maintaining advanced image editing functions.as shown in **Exhibit P-14** ;

56. The models described above collectively represent OpenAI's generative artificial intelligence models for visual creation, constructed upon these foundational datasets.

E. Evidence of Memorization and Infringement in Generated Outputs

57. A 2024 study titled *Evaluating and Mitigating IP Infringement in Visual Generative AI*, conducted by Sony AI, Rutgers University, and Northeastern University, demonstrated that models such as DALL·E 3 are capable of reproducing protected

characters with high fidelity. The researchers also proposed a mitigation mechanism, called TRIM, to detect and address infringing outputs, as shown in **Exhibit P-15**;

> *"Through extensive evaluation, we discovered that the state-of-the-art visual generative models can generate content that bears a striking resemblance to copyrighted characters" ,and "detect[er] the generated content that potentially infringes IP ".*

58. These models are able to faithfully replicate iconic characters such as *Spider-Man*, *Iron Man*, *Hulk*, *Batman*, *Superman*, or *Super Mario*, as a result of memorization of visual patterns from their training datasets;

(a) Midjourney (b) DALL-E 3 API (c) DALL-E 3 Microsoft Designer

Figure 1: Generated samples of different the state-of-the-art visual generative AIs by using the prompt *"Generate an image of the Spider-Man"*. Images are generated in April, 2024. The generated contents violate the IP of the "Spider-Man".

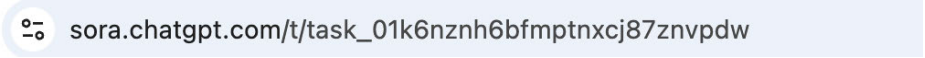
(a) Midjourney (b) DALL-E 3 ChatGPT4 Website (c) DALL-E 3 Microsoft Designer

Figure 1 in the study contains samples generated by the researchers using specific prompts. The generated content infringes the intellectual property rights of Spider-Man,

59. The PAW Patrol franchise, owned by Spin Master Entertainment, was also directly reproduced by OpenAI's image generator in response to a descriptive text prompt, without any license. The generated visuals accurately reproduced protected characters and settings;

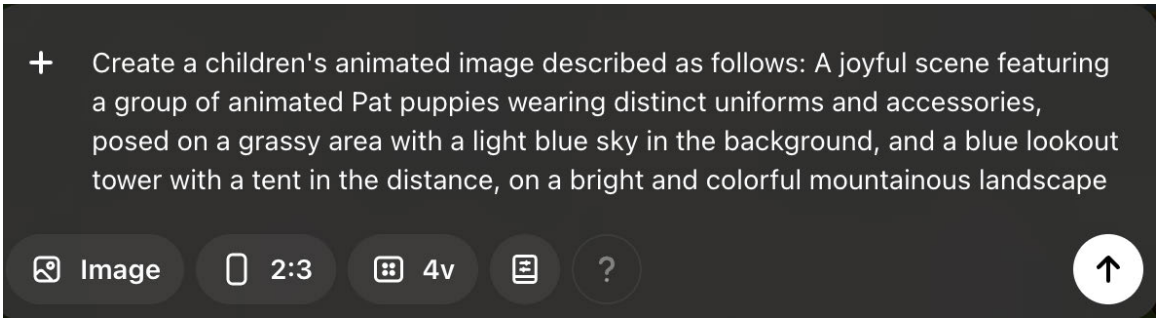
60. Tests conducted using Sora demonstrate that detailed descriptions can be used to bypass safety filters and generate images of protected cartoon characters, including those from PAW Patrol. This highlights both technical memorization and the model's ability to regenerate protected elements;

Figure 2 contains samples generated by a visual generative model using the following prompt:



VS

Sora's Reproduction ***vs.*** ***Paw Patrol's Originality***



61. The generation of images that are substantially similar to protected works for example, the fidelity of the Test Image to the stylistic and iconographic markers of *PAW Patrol* (uniforms, color palettes, anthropomorphic traits) gives rise to direct infringement liability for the user or disseminator, as shown in **Exhibit P-16 (Video)** ;

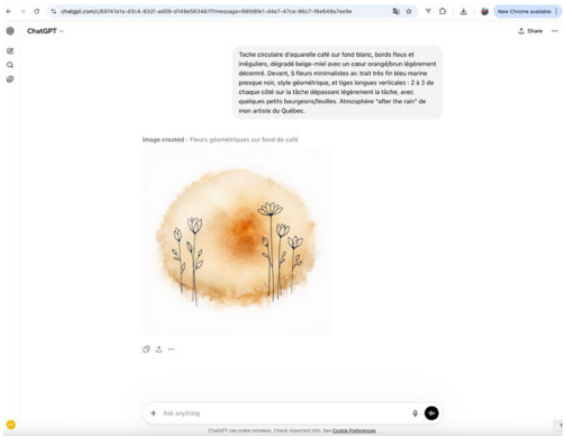
62. Despite OpenAI's reluctance to fully disclose the use of massive datasets often comprising billions of copyrighted materials, including images like paintings, posters, toys, and screenshots these vast libraries, scraped from the web and ubiquitous in the generative AI ecosystem, inevitably incorporate protected content ;

63. This leads to the effective embedding of such materials into the model's parameters through training and transformation processes, resulting in technical memorization that enables the regeneration of proprietary fragments. OpenAI then offers these trained models to users for content creation, building its revenue stream projected at billions directly on this foundation, much of which raises serious questions about unauthorized use ;

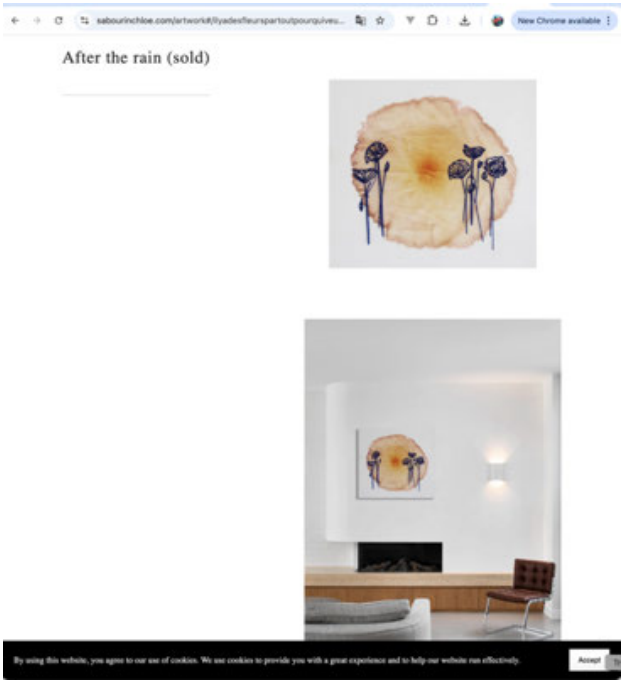
63.1 The Applicant submitted a purely technical description to OpenAI's AI, without ever naming the work or the artist. She described the constituent elements: the circular watercolor wash in ochre/coffee tones and the five minimalist flowers in navy blue lines ;

63.2 What is striking here is the reproduction of the spatial arrangement. The AI did not merely draw flowers; it reproduced: the exact shade of the watercolor wash; the precise number (five) and the graphic style of the flowers; and the minimalist structure of the line work ;

The submitted prompt (test)



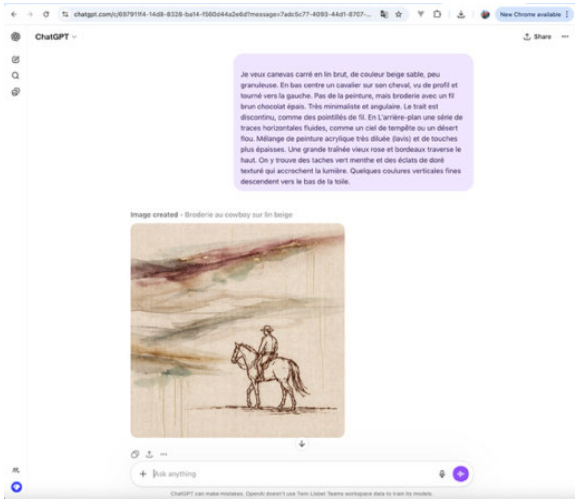
The Applicant's Original Work



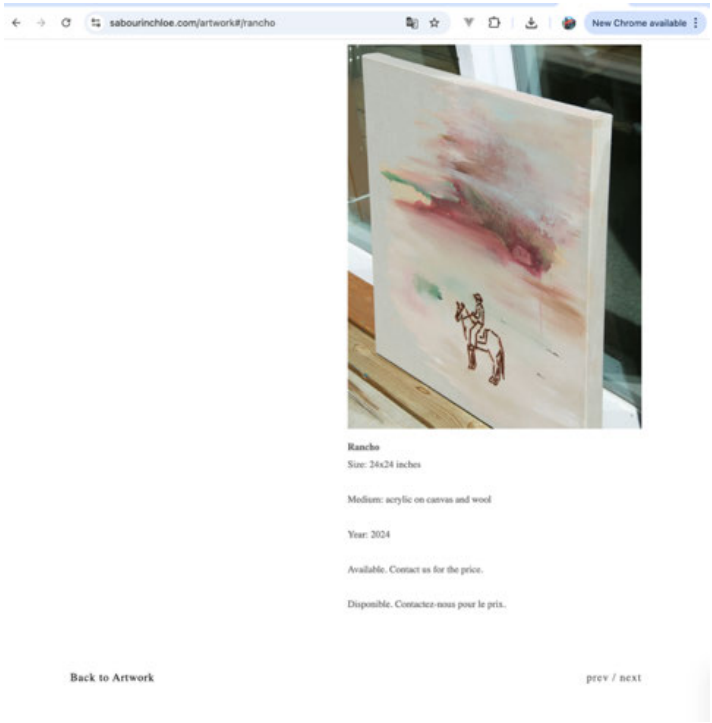
63.3 A highly precise technical description (a "prompt") was submitted to the DALL·E 3 model to test whether the AI could recreate Chloé Sabourin's unique style. The comparison between the original work *Rancho* (2024) and the generated images

reveals a similarity that exceeds mere coincidence: the AI selected the exact same grey-green color code as the artist ;

The submitted prompt (test)



The Applicant's Original Work



V. BUSINESS PARTNERS OF THE DEFENDANTS

64. Through its Stargate project, OpenAI partners with giants such as Microsoft, Oracle, NVIDIA, SoftBank, to build a colossal AI infrastructure, with a $500 billion investment planned by 2029 for data centers in the United States. The project also has international deployment components, such as Stargate UAE with G42 as it appears from the OpenAI announcement entitled "*Nouveau : projet Stargate*,", as shown in **Exhibit P-17** ;

65. These partnerships, mobilizing massive computing power (10 GW+), raise concerns about the control of data captured from the web, particularly images used to train the models ;

66. These data, processed via shared clouds (e.g., Oracle, Microsoft), carry risks of copyright infringement (e.g., through DALL·E or Sora) and privacy violations, without clear guarantees against redistribution to third parties ;

67. Data captured from the web, including images, are by default used to improve OpenAI's models, unless explicitly opted out through the privacy portal ;

68. Generated or extracted images may be reproduced, modified, or distributed by OpenAI, with a risk of dissemination through cloud or international partners such as G42, without full traceability ;

69. In the Stargate ecosystem, the massive volumes of data (5+ GW) increase the risks of reproducing protected works or of unauthorized use, without robust mechanisms to safeguard the rights of creators or individuals, as it appears from Exhibit P-8 and P-9.

70. OpenAI's terms of use lack clarity regarding the management of captured data and their sharing with partners, as indicated in the document entitled "*Terms of Use & Privacy Policy*" published by OpenAI, as shown in **Exhibit P-18** ;

71. While the terms allow for an opt-out, they remain vague about the transfer of data through third parties and about the traceability of images after distribution.

72. Users and creators are therefore exposed to an opaque ecosystem, where data may be shared with authorities or partners for legal reasons, without effective control ;

72.1 The European Parliament report (2025/776529) confirms that AI models, such as those from OpenAI, do not create from nothing. They exhibit a persistent functional dependency on the original works. Mathematically, every generated image is the direct result of the statistical influence of data pirated during training, as shown by **Exhibit P-18.1;**

72.2 In other words, the AI does not create a new image; it reproduces the statistical patterns of an image, such as Caillou, while masking this copy under an appearance

of novelty. The study highlights a structural failure in traceability. OpenAI has designed a system capable of extracting the substance of a work (such as Caillou's colors and features) while remaining unable, or refusing, to cite the original source, as shown by **Exhibit P-18.2;**

72.3 The Federal Trade Commission (FTC) report confirms that the development of OpenAI's models relies on the massive and automated collection of data through "scraping." This method consists of extracting large volumes of content from the Internet and third-party platforms, including works protected by copyright, without having obtained a license or prior consent from the rights holders ;

72.4 The regulator emphasizes that AI developers have now exploited nearly all publicly available textual and visual data. Consequently, internal communications cited in the report indicate a strategic intent to access "high-quality" data sources, which are often protected, in order to accelerate development cycles and maximize commercial value for their partners ;

72.5 The FTC investigation demonstrates that protected data is not used solely for initial training (pre-training). It is the subject of complex commercial agreements, notably with Microsoft, allowing for an exchange of technological resources and a systematic reuse of results (outputs) within a closed ecosystem ;

VI. ETHICAL ISSUES RAISED BY THE MODELS OF THE DEFENDANTS

73. OpenAI experienced significant subscription growth, rising from 5.8 million ChatGPT Plus/Enterprise subscribers in 2023 to 15.5 million by the end of 2024, representing a threefold increase, as it appears from the report entitled "*ChatGPT Statistics (2025)*" published by DemandSage, communicated herewith as **Exhibit P-19** ;

74. The company monetizes its services through subscriptions and APIs for its models such as Sora and DALL·E, integrated into ChatGPT Plus and Pro. These plans include filters against harmful content, fostering massive adoption despite ethical challenges, as indicated in the OpenAI policy document entitled "*Transparency & Content Moderation,*" attached in support of this application as **Exhibit P-20** ;

(1) **ChatGPT Plus**: For USD 20/month (approximately CAD 25.20/month at the exchange rate of 1 USD = 1.26 CAD), users gain access to image generation via DALL·E and limited use of Sora, as it appears from the OpenAI announcement entitled "*Introducing ChatGPT Plus*," communicated herewith as **Exhibit P-21** ;

(2) **ChatGPT Pro**: For USD 200/month (approximately CAD 252/month), this plan provides extended access to Sora, including advanced features such as video generation from scraped images or complex prompts, as it appears from the OpenAI announcement entitled "*Introducing ChatGPT Pro*," communicated herewith as **Exhibit P-21.1** ;

75. The business model relies on attracting users to paid plans from a free basic version, encouraging adoption of advanced features ;

76. In September 2025, the company reached an annualized revenue of $12 billion, doubling its projections in seven months, thanks to subscriptions (ChatGPT Plus, Enterprise) and API sales, as shown by **Exhibit P-22** ;

77. ChatGPT dominates with 700 million weekly active users, quadrupling in one year, and aims for 1 billion by the end of 2025, as shown by **Exhibit P-23** ;

78. The site records 5.72 billion monthly visits, with 190.6 million daily users and over 10 million ChatGPT Plus subscribers. The United States (15%) and India (9.4%) are the main markets, as further indicated in the DemandSage report entitled "*ChatGPT Statistics (2025),*" attached in support of this application as **Exhibit P-19** ;

79. Financially, OpenAI raised $40 billion in March 2025, valuing the company at $300 billion, with SoftBank, Microsoft, and other investors, as it appears from the TechCrunch article entitled "*OpenAI raises $40B at $300B-$500B post-money valuation*," communicated herewith as **Exhibit P-24** ;

VI.1 KNOWLEDGE OR PRESUMED KNOWLEDGE

80. In law and equity, OpenAI cannot retain the profits derived from its contractual breaches and unjust enrichment, given its manifest recklessness and blatant egocentrism, focused solely on its own interests, which disregards the harm inflicted upon creators ;

81. The company's conduct warrants an accounting of profits, restitution, and any other equitable remedy to address these wrongs. Sam Altman, CEO of OpenAI, has defended the use of protected data to train artificial intelligence models ;

82. As reported in the Engadget article titled "OpenAI admits it's impossible to train generative AI without copyrighted materials" (**Exhibit P-25**), during a session before the House of Lords in the United Kingdom, he stated:

    "It would be impossible to train today's models without copyrighted material." and "Limiting training to only books and images in the public domain would not meet the needs of citizens."

83. He argued that restricting training to public domain data alone would hinder the development of AI. During a U.S. Senate hearing in May 2023, Altman reiterated similar views, advocating that creators should gain a "*significant advantage*" from AI, while implicitly acknowledging the reliance on protected data to train the models, as evidenced by **Exhibit P-26** ;

VII. COPYRIGHT INFRINGEMENT

i. Infringement Related to Data Input

i.1 Jurisprudential Context

84. The jurisprudential development relating to the rights of artists over their visual works has given rise to notable lawsuits in the United States against artificial intelligence companies specializing in generative imaging models, including OpenAI, following the release of its tools, which reproduce protected artistic styles without authorization ;

85. Creative artists have brought legal actions against several entities operating artificial intelligence, notably Stability AI, DeviantArt and Midjourney, alleging that their works protected under the Copyright Act were reproduced and incorporated without authorization into the training databases of the Stable Diffusion system ;

86. This conduct constitutes an unauthorized reproduction within the meaning of section 3(1) of that Act and an infringement within the meaning of section 27 ;

87. This document explicitly states that CLIP was designed and trained by these researchers to learn visual concepts from natural language supervision, using a dataset of 400 million (image, text) pairs collected from the Internet ;

88. As in the lawsuit *Andersen v. Stability AI et al.*, case no. 3:23-cv-00201-WHO (**Exhibit P-27 and 27.1)** filed on January 13, 2023 before the Federal Court for the Northern District of California, where the plaintiffs argue that the Stable Diffusion model contains “compressed copies” of their protected works, engaging direct and contributory infringement ;

89. The allegations were deemed plausible in August 2024, allowing the case to proceed to the discovery phase in 2025, with factual discovery closing on October 9, 2025, and trial set for September 8, 2026 ;

90. These legal actions assert that the defendants commit a systematic violation of artists’ proprietary rights.

91. The defendants reply that their systems generate abstract mathematical representations rather than direct copies, thus disputing the characterization of infringement ;

92. The company OpenAI, through its tools, uses the same methods in order to achieve the same result ;

i.2 Technical Operation of the CLIP Model

93. In order to understand the nature of the infringement committed during the training of artificial intelligence models, it is important to examine the technical operation of the CLIP model (Contrastive Language–Image Pretraining), designed by OpenAI. This model constitutes an essential component of image diffusion systems and illustrates

the manner in which protected works are copied and analyzed on a large scale to establish correlations between text and image (**Exhibit P-27.2)** ;

104] In 2021, researchers from OpenAI introduced the idea of a CLIP model in a paper called "Learning Transferable Visual Models From Natural Language Supervision." A CLIP model quantifies the semantic correlation between images and captions.

[105] "CLIP" stands for "contrastive language–image pretraining." This connotes the idea that during training, a CLIP model learns to correlate images and captions by ingesting protected expression from training images along with their text captions. Whereas a diffusion model learns to generate actual images, the CLIP model learns to correlate images and captions. An image is meaningless to a CLIP model without its accompanying text caption. These images and their text captions are colloquially known as an "image-text pair" or "text-image pair" (or in this complaint, a training image).

[106] These captions are often generated by the artists themselves. For example, when an artist uploads an image to their personal website, they may include a caption that describes the image and also identifies themselves as a way of managing the image's use.

[107] Like a diffusion model, a CLIP model is trained by copying and ingesting a huge number of training images—on the scale of hundreds of millions or billions. Though a diffusion model cooperates with a CLIP model in CLIP-guided diffusion, the two models are trained separately. They may be trained on the same training dataset. But this is not required.

i.3 Creation of the LAION-400M and LAION-5B Datasets

94. In order to train their generative models, the defendants relied on massive datasets composed of copies of images and texts extracted from the public web without authorization. Among these datasets, LAION-400M and LAION-5B are the most widely used and most revealing of large-scale collection practices:

Case 3:23-cv-00201-WHO Document 238 Filed 10/31/24 Page 17 of 88 (**Exhibit P-27.2)**

[63] […] Common Crawl is a corpus of 250 billion web pages copied from the public web, including assets like Plaintiffs' images (https://commoncrawl.org/). The metadata records contain web URLs. According to the LAION-400M Paper, LAION created training images by first "pars[ing] through [the metadata records] from Common Crawl and pars[ing] out all HTML IMG tags containing an alt-text attribute [that is, a text caption]. Then, LAION "download[ed] the raw images from the parsed URLs." … LAION used a CLIP model to calculate the CLIP embeddings for the image and text of each image–text pair.

95. In October 2022, LAION published LAION-5B, a dataset of 5.85 billion training images, more than fourteen times larger than LAION-400M ;

96. The LAION-5B Paper confirms that LAION-400M is a subset thereof. The creation process, based on Common Crawl, again involved massive downloading of images and similarity measurement using a CLIP model ;

97. The LAION-5B Paper appears a boldfaced warning (see also **Exhibit P-27.3**) stating that the authors *strongly advise against using the datasets in industrial settings and, even more so, strongly advise against using the datasets in their original form for creating end products* ;


We release both Re-LAION-5B-research and Re-LAION-5B-research-safe under Apache 2.0 License, which ensures researchers can freely utilize datasets both for conducting basic or applied research. Our usage recommendation stays the same as in our previous release. The datasets are released for research purposes, especially for conducting basic research on various open multi-modal foundation models, e.g. openCLIP, in academic settings. **We strongly advise AGAINST using the datasets in industrial settings and even more so, we advise strongly AGAINST using datasets in their original form for creating end products.** We explicitly warn that Re-LAION datasets can contain links to various image samples that can be strongly discomforting dependent on the viewer and are NOT meant for casual viewing apart from inspection necessary for purposes of scientific and/or safety analysis performed by trained researchers.

i.4 Legal Scope of the Reproduction

98. This training process, described as a "*21st-century collage*" challenging the consent of artists, gives artificial intelligence companies a predominant competitive advantage by flooding the market with derivative images that devalue original creations ;

99. It thereby erodes the ability of artists to obtain fair remuneration for their skills and causes permanent effects on the visual art market ;

100. The defendants downloaded, in whole or in substantial part, each of the protected works without license or consent from the group members ;

101. Through massive scraping, they intentionally bypassed artists' technical protection measures such as access controls and robots.txt files in order to build their datasets, notably WIT, and to feed systems such as artificial intelligence systems augmented by data retrieval ;

102. These acts violate sections 41 and 41.1 of the *Copyright Act*, which prohibit the circumvention of protection measures governing access to and copying of works. This directly links data input to the economic substitution mentioned in section X(i) ;

ii. Infringement Related to Data Output

103. OpenAI's systems, including DALL-E and Sora, have generated and distributed to the public images substantially similar to protected works or imitating the distinctive style of the group members ;

104. These images incorporate identifiable portions of those works, in violation of section 3(1) of the Copyright Act ;

105. At all relevant times, the defendants knew or ought to have known that their image generators reproduced protected works and encouraged their users to commit copyright infringements ;

106. The making available of these images constitutes a publication of the works within the meaning of sections 2.2(1)(a) and 3(1) of the *Copyright Act* ;

107. Alternatively, it constitutes a communication to the public by telecommunication within the meaning of sections 2.4(1.1) and 3(1)(f) ;

108. These acts violate copyright in accordance with section 27, extending the negative effect on the market identified in section X(i) ;

ii.1 Provision of Services for the Purpose of Committing an Infringement

109. The defendants incur liability under section 27(2.3) of the Copyright Act, according to the factors set out in section 27(2.4) ;

110. By promoting their services as capable of reproducing the distinctive styles of protected works, they facilitated infringements within the meaning of section 27(2.4)(a) ;

111. They encourage users to generate content "*in the style of*" renowned artists, filmmakers or studios, and had actual knowledge of the infringements made possible by their services, in accordance with section 27(2.4)(b) ;

112. Despite their ability to restrict these infringements, the defendants deliberately failed to implement adequate protective measures and chose unlicensed material when authorized databases were available, in contravention of section 27(2.4)(d) ;

113. They moreover withdrew millions of dollars in profits directly derived from the facilitation of infringements, within the meaning of section 27(2.4)(e) ;

114. These acts constitute an intentional violation of the members' rights to integrity and dignity (section 4 of the *Charter of Human Rights and Freedoms*), as well as to the free enjoyment and disposal of their property (section 6 of that Charter), justifying the award of punitive damages ;

ii.2 Position of Professional Associations

115. In January 2024, the Regroupement des artistes en arts visuels du Québec (RAAV) and Canadian Artists' Representation / le Front des artistes canadiens (CARFAC) formulated firm recommendations, as appears from **Exhibit P-28** ;

116. They emphasize that the generative artificial intelligence models of Meta and OpenAI are trained on the works of Canadian, including Quebec, artists through data and text scraping, in violation of the Copyright Act. These associations denounce the opacity of the companies, which fail to disclose the works exploited, thereby hindering any recourse ;

117. They advocate for: (i) mandatory registers of the works used; (ii) the rejection of fair-dealing exceptions; (iii) the creation of collective licensing mechanisms ensuring consent, credit and compensation.

118. A survey conducted among more than 220 artists, including Quebecers, revealed major concerns about these practices, which threaten the moral integrity of works and the local cultural economy, as indicated in **Exhibit P-28.1** ;

72.6 Distinctly, the 2023 survey conducted by RAAV and CARFAC specifically among visual artists in Canada highlights a widely shared concern regarding generative artificial intelligence, revealing a generalized sense of vulnerability and anxiety within the artistic community, as shown by **Exhibit P-28.2;**

118.1 The majority of artists surveyed in this 2023 study denounce the fact that their works could be used to train artificial intelligence systems without their consent, compensation, or recognition. Many are unaware of whether their creations have actually been used, but strongly fear that this is the case ;

118.2 This structure allows partners to benefit directly from the economic value of protected content without compensating the original creators ;

118.3 As highlighted in the UNESCO report of February 2026, generative AI is no longer a theoretical threat: it is causing real economic devaluation, forecasting a 21% drop in the income of audiovisual professionals by 2028. The harm suffered by the Applicant is immediate: erosion of exclusivity, dilution of market value, and loss of control over the exploitation of her image, as shown by **Exhibit P-28.3;**

VII.1 SUBSEQUENT VIOLATIONS IN THE PRESENT CASE

II.1 Effect of the Use on the Work

119. The effect of the use of artistic works in the training of artificial intelligence models is a determining factor in assessing whether the use is fair or infringing ;

120. In this case, the massive and systematic exploitation of visual artworks by the defendants does not have merely an incidental or neutral effect: it results in direct economic substitution ;

121. The resulting generative image models (DALL·E 3, Sora, GPT-4o) compete with artists in the same market for creative and advertising visuals ;

122.(…)

123.(…)

124.(…)

124.1 According to the landmark ruling in *CCH Canadian Ltd*. v. *Law Society of Upper Canada, 2004 SCC 13*, copyright protection in Canada is based on the exercise of "skill and judgment," which must not be a "purely mechanical exercise." Current scientific evidence demonstrates that OpenAI's models, such as GPT-4 and DALL·E 3, operate through statistical memorization, a purely mechanical extraction of pixels that constitutes a direct violation of the Applicant's copyright ;

124.2 To determine if such use could be excused, the Supreme Court established a two-step "Fair Dealing" analysis. The Defendants fail at both stages:

a. Step 1: The Allowable Purpose Test

124.3 For a dealing to be fair, the purpose must fall under specific categories (research, private study, criticism, review, news reporting, education, satire, or parody). OpenAI's massive ingestion of data does not serve these purposes; it is a large-scale commercial exploitation designed to create a competing product ;

b. Step 2: The Six Factors of Fairness

124.4 Even if a purpose were found, OpenAI's use cannot be qualified as "fair" according to the six factors established by the Court (2004 SCC 13):

a) The Purpose of the Dealing: Far from philanthropic research, OpenAI pursues a predominant commercial and lucrative end ;

b) The Character of the Dealing: This is not a single, transient copy, but an industrial, permanent, and systemic reproduction via data harvesting and "scraping." ;

c) The Amount of the Dealing: OpenAI does not cite excerpts; it ingests complete artistic corpora (billions of images), far exceeding any qualitative or quantitative threshold of fairness ;

d) The Nature of the Work: The Applicant's visual creations are highly creative works—colorful, feminist, and minimalist paintingsm protected at the very core of the *Copyright Act*, and are not mere factual data ;

e) Alternatives to the Dealing: The unauthorized use of the Applicant's works was not necessary. OpenAI could have relied on licensing agreements or public domain data—choices it deliberately avoided to maximize its own profits ;

f) The Effect of the Dealing on the Work (The Decisive Criterion): There is a concrete market substitution effect. By instantly generating images indissociable from the original (e.g., the reproduction of Caillou), OpenAI destroys the artist's market value and supplants the demand for original human creations ;

124.5 The 2025 European Parliament report denounces a structural "traceability gap" in this process. OpenAI generates exact copies of protected works while masking them under generic titles (e.g., "Smiling student" for Caillou). This practice, described as "data laundering," proves that OpenAI is not acting in good faith ;

124.6 It has designed a system capable of appropriating the talent of others while voluntarily removing source attribution, thereby violating both the economic and moral rights of creators. OpenAI fails every criterion of the *CCH* test; its activity is not a neutral technological evolution, but a parasitic and mechanical exploitation of Canadian artistic heritage ;

124.7 Furthermore, when an artist uses Photoshop, they make aesthetic and technical choices at every step; the software is a mere tool. In contrast, OpenAI's DALL·E 3 system performs the "expressive fabrication" itself ;

124.8 A simple text prompt is sufficient to generate a complex image. As noted by the New York State Bar Association, the user of an AI does not control the expressive result; it is the model that, through its algorithmic processes, determines the composition and details, depriving the human user of control over the expressive result, as shown by **Exhibit P-28.4;**

II.2 Communication to the Public and Large-Scale Reproduction

125. By transmitting and making publicly accessible the outputs of its AI models, notably via the ChatGPT platform and associated models, OpenAI performs a communication to the public by telecommunication within the meaning of paragraph 3(1)(f) of the Copyright Act ;

126. Unlike the occasional transmissions referred to in *CCH* (paras. 77-79), the defendants carry out millions of daily distributions of generated images and videos, many of which partially or substantially reproduce protected works ;

127. This systematic repetition corresponds exactly to the situation envisaged by the Court, in which "the repeated transmission of a copy of the same work to numerous recipients" constitutes a communication to the public and a copyright infringement ;

128. OpenAI's platforms therefore meet the conditions of a public communication: simultaneous online dissemination to millions of users, universal accessibility, and direct commercial purpose (through ChatGPT Plus and Pro subscriptions and APIs) ;

II.3 Subsequent-Stage Infringement (s. 27(2) CA)

129. The elements of subsequent-stage infringement, as set out by Justice Rothstein in *CCH* (para. 81), are met:

1. Initial infringement: the training of AI models from works copied without authorization constitutes an initial copyright infringement (s. 27(1) CA) ;

2. Knowledge: OpenAI and its entities knew or ought to have known that the datasets used (WIT, Common Crawl, LAION-5B) contained protected works, as indicated in their technical publications ;

3. Subsequent-stage use: the works thus reproduced were incorporated into AI models subsequently commercialized and distributed to third parties (s. 27(2)(b)) ;

130. By continuing to exploit these models despite knowing their illicit origin, the defendants are guilty of a subsequent-stage infringement for commercial purposes, aggravating the initial fault and engaging their full liability ;

II.4 Exception Relating to Articles of the Copyright Act

131. Unlike the "*Great Library of the Law Society*" in *CCH* (para. 84), OpenAI and its entities are private for-profit companies whose purpose is the monetization of data and the commercial exploitation of the works used ;

132. These entities meet none of the exclusion criteria:
(i) they are not established or operated for non-profit purposes;
(ii) they do not act within a public-interest mandate;
(iii) they derive direct revenues from the reproduced works.

VIII. CONDITIONS REQUIRED TO INSTITUTE A CLASS ACTION

i. Composition of the class

133. The class is composed of Québec visual artists, including painters, illustrators, draftsmen, photographers, sculptors, and textile artists, whose copyrighted visual works were reproduced, in whole or in part, without authorization, by or for the defendants in the course of developing or training their generative artificial intelligence models ;

134. At this stage, no subgroups have been identified. Due to the secrecy maintained by the defendants regarding the specific works used, it is difficult to precisely determine the composition of the class. Nonetheless, the class action encompasses all Québec visual artists whose works have been affected across the country ;

ii. Description of the Applicant

135. Chloé Sabourin, born in 1993 in Montreal, is an emerging painter. She creates minimalist acrylic paintings on canvas, exploring themes such as feminism, society, emotions, and dreams, sometimes integrating short poems to add a narrative dimension ;

136. A graduate in arts, literature, and communications (Cégep Jean-de-Brébeuf), in law (University of Sherbrooke), and holding a master's degree in arts management in Paris, she pursues her artistic practice ;

137. Her works have been exhibited in Montreal (e.g., *Believe in Art*, La Cenne, 2014), Toronto, and Los Angeles, and are sold through her website (https://sabourinchloe.com/) and galleries such as Les Rabat-Joies and Carré d'Artistes ;

138. Active on Instagram (@chloe.sabourin) with more than 17,000 followers, she uses social media to promote her work ;

iii. Breaches of copyrights

139. The defendants committed serious breaches by violating the rights of visual artists, including the Applicant, protected under the *Copyright Act* ;

140. Pursuant to sections 3(1)(a) and 3(1) *in fine* of the *Copyright Act*, the members of the group hold exclusive reproduction rights over their visual works. The defendants reproduced these works without authorization, notably through systems such as DALL·E and Sora, resulting in a direct violation of section 27(1) ;

141. The defendants used automated scraping tools to collect millions of protected images, including those of the Applicant. This collection, carried out without consent and by circumventing watermarks and access restrictions, constitutes copyright infringement under section 41 et 41(1) of the *Copyright Act* ;

142. Furthermore, by making their generative AI models available to global users, the defendants enable the unauthorized reproduction of protected works, incurring liability for secondary infringement under section 27(2)(b) of the *Copyright Act* ;

143. By integrating the artists' works into their AI models without attribution, the defendants violated the creators' moral rights, in contravention of sections 14.1 and 28.1 of the *Copyright Act*, depriving artists of recognition essential to their identity ;

144. Moreover, by unlawfully exploiting protected works to develop AI tools that generate competing images, the defendants cause economic harm to artists, undermining their livelihoods and violating the principles of a fair market ;

145. These actions, described as piracy by the Applicants, contravene the provisions of the *Copyright Act* and infringe upon the fundamental rights of artists, causing both material and moral harm ;

iv. Adequacy of proposed class representative

146. The Claimant is dedicated to representing the group members. She has the necessary time to fully devote herself to the case. She mandates us to gather all relevant information and ensures constant follow-up on the case ;

147. Acting in good faith, she undertakes the necessary steps to defend the rights of Quebecers, ensuring that any harm suffered by each individual is remedied ;

v. Juridiction of the courts

148. The courts of Quebec have jurisdiction to hear disputes related to alleged faults committed, in whole or in part, on the territory of Quebec ;

149. This jurisdiction is further reinforced when the Plaintiff resides in Quebec, as is the case here, and when several members of the group targeted by the class action also reside in the province ;

150. Under the *Copyright Act*, a class action may be brought before the courts of Montreal ;

151. This approach ensures equitable access to justice for all members of the group ;

152. Quebec is a major artistic hub in Canada ;

153. According to the 2021 census, Quebec is the second province in Canada in terms of total number of artists, with 43,100 artists, representing 21% of all artists in the country, as shown in **Exhibit P-29** ;

154. This dynamism is particularly pronounced in Montreal, which is an exceptional art center, as shown in **Exhibit P-29.1** ;

155. The city is home to nearly half (48%) of Quebec's professional artists, or 20,900 individuals. Moreover, artists represent 1.8% of Montreal's workforce, a rate significantly higher than the Quebec average (0.9%) and the Canadian average (1.0%), as shown in **Exhibit P-30** ;

156. The Plaintiff proposes that the class action be brought before the courts of Montreal, arguing that this jurisdiction is the most appropriate due to the location of the parties involved and the place where the alleged faults were committed ;

157. The city is also designated as a key location for Quebec's artistic community, with a large number of art galleries, as previously mentioned ;

158. The artistic ecosystem, supported by emblematic venues such as Montreal's Old Port, makes the province a natural jurisdiction for hearing disputes concerning artists' rights ;

vi. Common issues

159. The claims of the Class members raise identical, similar or related questions of fact or law, namely:

(a) Did the defendant reproduce, copy or use, without a licence or consent, artistic works protected by copyright of which the group members are the holders (s. 3, 27 *Copyright Act*)?

(b) Did the defendant circumvent or neutralize technological protection measures put in place to protect these artistic works (s. 41.1 *Copyright Act*)?

(c) Did the defendant remove, modify or alter copyright management information incorporated into the artistic works (s. 41.22(1) *Copyright Act*)?
(d) Did the defendant infringe the moral rights of the group members in their artistic works (s. 14.1 *Copyright Act*)?

(e) Did the defendant violate rights guaranteed to the group members by the *Charter of Human Rights and Freedoms*?

(f) Did the defendant derive an economic advantage from the unauthorized use of the artistic works?

(g) Did the artists, including the applicant, suffer prejudice corresponding to Quebec, including a loss of control, a reduction in licensing revenues, or an infringement of the market value of their artistic works?

(h) Were the authors deprived of the opportunity to choose to license their artistic works or to refuse their use?

(i)Does the use of artistic works for the training of Generative artificial intelligence models for visual creation result in a substitution or competition detrimental to the authors' artistic works on the market?

(j) Should the defendant's alleged conduct be considered as aggravating the infringement of the rights of the group members?

(k) Do the circumstances of the case allow for the granting of punitive damages under the applicable law?

(l) Are the group members entitled to compensatory damages and/or statutory damages (s. 38.1 *Copyright Act*)?

(m) Must the defendant account for the profits made through the use of the artistic works and restitute their value to the group members (s. 35 and 41.1 *Copyright Act*)?

(n) Does the use of artistic works to train generative artificial intelligence models for visual creation result in substitution or competition detrimental to the class members' artistic works in the relevant market?

(o) What are, generally, the remedies and redress (damages, restitution, injunction, corrective measures) to which the group members may be entitled?

vii. Nature of the action and conclusions sought

160. The action that the applicant wishes to institute for the benefit of the class members is an action in compensatory damages, restitution of profits, punitive damages, and injunctive relief ;

161. The conclusions that the applicant wishes to introduce by way of an application to institute proceedings are:

A. **GRANT** the present application;

B. **ORDER** the defendant to pay an amount to be determined by the Court as **punitive damages**, taking into account the unlawful and intentional infringement of the copyright and moral rights of the group members, with interest at the legal rate and the additional indemnity starting from the judgment;

C. **ORDER** the defendant to pay each group member the sum of **twenty thousand dollars ($20,000)**, as **compensatory damages** for all artistic works exploited without authorization, said amount being adjustable, if applicable, to reflect the exact number of artistic works concerned, with interest at the legal rate and additional indemnity starting from the service of the application;

D. **ORDER** the defendant, in addition to the damages referred to in paragraph C, to **restitute** to each group member a fair proportion of the profits made as a result of the copyright infringements, with interest at the legal rate and additional indemnity starting from the service of the application;

E. **SUBSIDIARILY AND AT THE APPLICANTS' CHOICE, IN REPLACEMENT OF CONCLUSIONS C AND D**: Order the defendant to pay each group member the sum of twenty thousand dollars ($20,000) per work exploited without authorization, as statutory damages in accordance with section 38.1 of the *Copyright Act*, R.S.C. (1985), c. C-42, with interest at the legal rate and additional indemnity starting from the service of the application;

F. **ORDER** the defendant, under penalty of a contempt order, to implement, in each of its generative artificial intelligence models for images (including, notably, Sora

and DALL·E), a complete technical traceability mechanism, comprising: (i) the integration into each generated image of a digital signature that is both visible and internally encoded (by secure metadata, digital watermark, or other equivalent process), allowing its direct origin from the model concerned to be attested; (ii) the establishment and maintenance of an internal verification and monitoring tool, accessible for audit and consultation, ensuring that the origin and distribution path of each image can be reliably and transparently authenticated.

G. **SUBSIDIARILY, AND AT THE APPLICANTS' CHOICE, IN REPLACEMENT OF CONCLUSION F.**, **ORDER** the defendant to implement, on its image generation and distribution platforms, a technical and contractual system allowing artists whose artistic works have been or are being used to train its models to identify and monetize their contributions, particularly through the integration of a licensing, remuneration, or direct redistribution mechanism on the said platforms, so as to ensure fair compensation in accordance with the principles of the *Copyright Act*.

H. **ORDER** the collective recovery of the claims;

I. **ORDER** the defendant to deposit the totality of the aforementioned sums, as well as the interest and the additional indemnity, with the office of the clerk of this court;

J. **THE WHOLE** with judicial costs including expert fees, notice publication fees, and claim administration fees;

FOR THESE REASONS, MAY IT PLEASE THE COURT TO:

A. **GRANT** the present application;

B. **AUTHORIZE** the institution of a class action for indemnity, for the restitution of profits, and accompanied by injunctive measures ;

C. **APPOINT** Chloé Sabourin as the representative of the group of persons described below:

All persons domiciled in the province of Quebec, holders of a copyright within the meaning of the *Copyright Act* (R.S.C. 1985, c. C-42) in an artistic work, whose works were used without authorization by the defendants to develop, train and/or commercialize their artificial intelligence models since October 19, 2023, or any other group to be determined by the court.

D. **IDENTIFY** the following as the main issues of law and fact to be dealt with collectively:

(a) Did the defendant reproduce, copy or use, without a licence or consent, artistic works protected by copyright of which the group members are the holders (s. 3, 27 *Copyright Act*)?

(b) Did the defendant circumvent or neutralize technological protection measures put in place to protect these artistic works (s. 41.1 *Copyright Act*)?

(c) Did the defendant remove, modify or alter copyright management information incorporated into the artistic works (s. 41.22(1) *Copyright Act*)?

(d) Did the defendant infringe the moral rights of the group members in their artistic works (s. 14.1 *Copyright Act*)?

(e) Did the defendant violate rights guaranteed to the group members by the *Charter of Human Rights and Freedoms*?

(f) Did the defendant derive an economic advantage from the unauthorized use of the artistic works?

(g) Did the artists, including the applicant, suffer prejudice corresponding to Quebec, including a loss of control, a reduction in licensing revenues, or an infringement of the market value of their artistic works?

(h) Were the authors deprived of the opportunity to choose to license their artistic works or to refuse their use?

(i) Does the use of artistic works to train generative artificial intelligence models for visual creation result in substitution or competition detrimental to the class members' artistic works in the relevant market?

(j) Should the defendant's alleged conduct be considered as aggravating the infringement of the rights of the group members?

(k) Do the circumstances of the case allow for the granting of punitive damages under the applicable law?

(l) Are the group members entitled to compensatory damages and/or statutory damages (s. 38.1 *Copyright Act*)?

(m) Must the defendant account for the profits made through the use of the artistic works and restitute their value to the group members (s. 35 and 41.1 *Copyright Act*)?

(n) Are the class members entitled to a permanent injunction prohibiting the defendant from continuing to use or distribute generative artificial intelligence models for visual creation trained on protected artistic works without authorization ?

(o) What are, generally, the remedies and redress (damages, restitution, injunction, corrective measures) to which the group members may be entitled?

E. **IDENTIFY** the following as the corresponding conclusions sought:

A. **GRANT** the present application;

B. **ORDER** the defendant to pay an amount to be determined by the Court as **punitive damages**, taking into account the unlawful and intentional infringement of the copyright and moral rights of the group members, with interest at the legal rate and the additional indemnity starting from the judgment;

C. **ORDER** the defendant to pay each group member the sum of **twenty thousand dollars ($20,000)**, as **compensatory damages** for all artistic works exploited without authorization, said amount being adjustable, if applicable, to reflect the exact number of artistic works concerned, with interest at the legal rate and additional indemnity starting from the service of the application;

D. **ORDER** the defendant, in addition to the damages referred to in paragraph C, to **restitute** to each group member a fair proportion of the profits made as a result of the copyright infringements, with interest at the legal rate and additional indemnity starting from the service of the application;

E. **SUBSIDIARILY AND AT THE APPLICANTS' CHOICE, IN REPLACEMENT OF CONCLUSIONS C AND D**: Order the defendant to pay each group member the sum of twenty thousand dollars ($20,000) per work exploited without authorization, as statutory damages in accordance with section 38.1 of the *Copyright Act*, R.S.C. (1985), c. C-42, with interest at the legal rate and additional indemnity starting from the service of the application;

F. **ORDER** the defendant, under penalty of a **contempt order (*astreinte*)**, to implement, in each of its generative artificial intelligence models for images (including, notably, Sora and DALL·E), a complete **technical traceability mechanism**, comprising: (i) the integration into each generated image of a digital signature that is both visible and internally encoded (by secure metadata, digital watermark, or other equivalent process), allowing its direct origin from the model concerned to be attested; (ii) the establishment and maintenance of an internal verification and monitoring tool, accessible for audit and consultation, ensuring that the origin and distribution path of each image can be reliably and transparently authenticated.

G. **SUBSIDIARILY, AND AT THE APPLICANTS' CHOICE, IN REPLACEMENT OF CONCLUSION F.**, **ORDER** the defendant to implement, on its image generation and distribution platforms, a technical and contractual system allowing artists whose artistic works have been or are being used to train its models to identify and monetize their contributions, particularly through the integration of a licensing, remuneration, or direct redistribution mechanism on the said platforms, so as to ensure fair compensation in accordance with the principles of the *Copyright Act*.

H. **ORDER** the collective recovery of the claims;

I. **ORDER** the defendant to deposit the totality of the aforementioned sums, as well as the interest and the additional indemnity, with the office of the clerk of this court;

J. **THE WHOLE** with judicial costs including expert fees, notice publication fees, and claim administration fees;

F. **DECLARE** that, unless excluded, the group members shall be bound by any judgment to be rendered in the class action in the manner provided by law;

G. **SET** the exclusion period at thirty (30) days from the date of the notice to members, at the expiration of which period the group members who have not excluded themselves shall be bound by any judgment to be rendered;

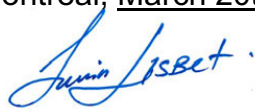
H. **ORDER** the publication of a notice to members in the terms and by the means to be determined;

I. **REFER** the file to the Chief Justice for the determination of the district in which the class action must be exercised and the designation of the judge to hear it;

J. **ORDER** the clerk of this court, in the event that the action must be exercised in another district, to transmit the file, upon the Chief Justice's decision, to the clerk of that other district;

K. **THE WHOLE** with judicial costs including notice publication fees.

Montreal, March 20th, 2026



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CANADA

PROVINCE OF QUÉBEC
DISTRICT OF MONTRÉAL

SUPERIOR COURT
(Chambre des actions collectives)

CHLOÉ SABOURIN,

N°: 500-06-001426-259

Applicant

v.

OPENAI, INC.
OPENAI GLOBAL, LLC
OPENAI GP, L.L.C.
OPENAI HOLDCO, LLC
OPENAI HOLDINGS, LLC
OPENAI OPCO, LLC
OAI CORPORATION
OPENAI STARTUP FUND GP I, LLC
OPENAI STARTUP FUND I, LLC
OPENAI STARTUP FUND MANAGEMENT, LLC

Defendants

AMENDED LIST OF EXHIBITS OF THE PLAINTIFFS IN SUPPORT OF THE AMENDED APPLICATION FOR AUTHORIZATION TO INSTITUTE A CLASS ACTION
(574 et seq. C.C.P.)

Exhibit	Description
P-1	Article – “Journal Accès” (Mar 2024): Profile of Chloé Sabourin and her feminist art.
P-1.1	Artwork examples: Sabourin’s colorful minimalist feminist acrylic paintings.
P-2	Registry docs: Delaware screenshots for multiple OpenAI entities.
P-3	Research paper (2021): GLIDE diffusion model trained on 250M image-text pairs.
P-4	OpenAI article (Dec 2024): “Sora is here” – 20 s HD video gen with watermarks.
P-4.1	Excerpt from Caillou's prompt conversation.
P-4.2	Scientific study entitled "Extracting Training Data from Diffusion Models"

Exhibit	Description
P-4.3	Fantastic Copyrighted Beasts research report (ICLR 2025) analyzing how models generate protected characters despite filters
P-4.4	Copyright Office pre-publication report (May 2025) on generative AI training.
P-5	Research paper (2021): WIT dataset – 400M image-text pairs, no copyright checks.
P-6	Overview: Common Crawl – massive web scraper, claims fair use, no filtering.
P-7	Definition: IBM on data curation.
P-7.1	Discussion: Neutral academic posts (e.g., OpenAI GitHub).
P-8	Preprint (2021): CLIP multimodal model trained on WIT, ignores copyright.
P-9	Dataset doc (2022): LAION-5B, 5.85B web pairs incl. copyrighted content.
P-10	Blog (Aug 2021): LAION-400M (10 TB) unlicensed data from Common Crawl.
P-11	Preprint (2022): DALL·E 2 trained on 900M web images, filters for safety only.
P-12	Doc (2023): DALL·E 3 – 1B web images with CLIP captions, no copyright filter.
P-13	MS blog (May 2024): GPT-4o multimodal launch – text/image/audio model.
P-14	Docs (2024-25): Sora – multimodal video/image generation up to 1 min.
P-15	Study (2024): AI reproduces IP-protected works; TRIM fix proposed.
P-16	Video evidence: Prompts create PAW Patrol-like images bypassing filters.
P-17	OpenAI announcement: “Stargate” – $500B infra w/ MS, Oracle, NVIDIA, SoftBank.
P-18	Policy: OpenAI Terms/Privacy – data sharing, vague traceability.
P-18.1	In-depth analysis by the European Parliament (July 2025) on the technological aspects of generative AI and copyright.
P-18.2	Federal Trade Commission (FTC) report from January 2025 concerning partnerships between cloud service providers and AI developers.
P-19	Report (2025): ChatGPT subs up to 15.5 M from 5.8 M in 2023 (DemandSage).
P-20	Policy: “Transparency & Moderation” – harm filters, appeals, Plus/Pro.
P-21	OpenAI announcement: “ChatGPT Plus” – $20/mo for DALL·E/Sora access.
P-21.1	OpenAI announcement: “ChatGPT Pro” – $200/mo, unlimited GPT-4o/Sora.
P-22	Report (Sep 2025): OpenAI $12B annual revenue – doubled in 7 months.
P-23	Report: ChatGPT 700M weekly users – aims 1B by end 2025.

Exhibit	Description
P-24	TechCrunch (Mar 2025): $40B raise at $300B valuation for Stargate.
P-25	Engadget (Jan 2024): Altman admits AI needs copyrighted material.
P-26	Senate doc (May 2023): Altman on AI training and creator benefits.
P-27	Reference: AI lawsuits vs Stability, DeviantArt, Midjourney.
P-27.1	Complaint (2023): Andersen v. Stability AI et al., N.D. Cal. case.
P-27.2	Amended complaint (Oct 2024): Andersen v. Stability AI et al.
P-27.3	Release (Aug 2024): LAION e.V. publishes Re-LAION-5B dataset.
P-28	Survey (Feb 2024): RAAV/CARFAC – 82% of artists concerned about AI.
P-28.1	Summary: Artists cite major concerns over AI data use.
P-28.2	Results of the RAAV-CARFAC survey (2023) conducted among Canadian visual artists on generative AI.
P-28.3	UNESCO report from February 2026 noting a significant decline in artists' income due to AI
P-28.4	Article from the New York State Bar Association analyzing the challenges posed by AI to copyright law, including the Zarya of the Dawn case.
P-29	Census (2021): Quebec 43K artists (21% of Canada).
P-29.1	Reference: Montreal as art hub – 20.9K artists, key venues.
P-30	Stats: Artists = 1.8% of Montreal workforce vs 1% Canada avg.

Montreal, March 20th, 2026

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NOTICE OF PRESENTATION
(Articles 146 and 574 C.C.P.)
(Article 55 of the Regulation of the Superior Court of Québec in Civil Matters)

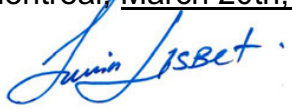
TO: **OPENAI, INC.**
OPENAI GLOBAL, LLC
OPENAI GP, L.L.C.
OPENAI HOLDCO, LLC
OPENAI HOLDINGS, LLC
OPENAI OPCO, LLC
OAI CORPORATION
OPENAI STARTUP FUND GP I, LLC
OPENAI STARTUP FUND I, LLC
OPENAI STARTUP FUND MANAGEMENT, LLC

Defendants

TAKE NOTICE that the Applicant's Application to Authorize the Bringing of a Class Action and to Appoint the Status of Representative Applicant will be presented before the Superior Court at **1 Notre-Dame East, Montréal, Quebec, H2Y 1B6, Canada**, in the judicial district of Montréal, on a date to be determined by the coordinating judge of the Class Action Chamber.

GOVERN YOURSELVES ACCORDINGLY.

Montreal, March 20th, 2026



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CANADA

PROVINCE OF QUÉBEC
DISTRICT OF MONTRÉAL

N°: 500-06-001426-259

SUPERIOR COURT
(Chambre des actions collectives)

CHLOÉ SABOURIN,

Applicant

v.

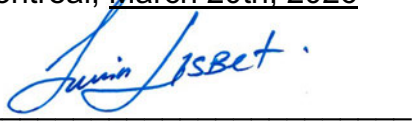
OPENAI, INC.
OPENAI GLOBAL, LLC
OPENAI GP, L.L.C.
OPENAI HOLDCO, LLC
OPENAI HOLDINGS, LLC
OPENAI OPCO, LLC
OAI CORPORATION
OPENAI STARTUP FUND GP I, LLC
OPENAI STARTUP FUND I, LLC
OPENAI STARTUP FUND MANAGEMENT, LLC

Defendants

CERTIFICATE OF REGISTRATION
IN THE NATIONAL REGISTRY OF CLASS ACTIONS
(Article 55 of the Regulation of the Superior Court of Québec in Civil Matters)

The Applicant, through her undersigned attorney, certify that the Application for authorization to institute a class action and to be appointed as representatives will be registered in the National Registry of Class Actions.

Montreal, March 20th, 2026



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500-06-001426-259

(CLASS ACTION)
SUPERIOR COURT
DISTRICT OF MONTREAL

CHLOÉ SABOURIN,

Applicant

V.

OPENAI, INC.
OPENAI GLOBAL, LLC
OPENAI GP, L.L.C.
OPENAI HOLDCO, LLC
OPENAI HOLDINGS, LLC
OPENAI OPCO, LLC
OAI CORPORATION
OPENAI STARTUP FUND GP I, LLC
OPENAI STARTUP FUND I, LLC
OPENAI STARTUP FUND MANAGEMENT, LLC

Defendants

AMENDED APPLICATION TO AUTHORIZE THE BRINGING OF A CLASS ACTION AND TO APPOINT THE STATUS OF REPRESENTATIVE APPLICANT

TWIN LISBET
Law firm.
Cabinet d'avocats.

Mtre Amal Sebti
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File N° : 10012025
Code Involved: BT1993

Objet: NOTIFICATION PAR COURRIEL//500-06-001426-259//Chloé Sabourin c. OpenAI inc. et al.
Date: vendredi 20 mars 2026 à 16:10:00 heure d'été de l'Est nord-américain
De: sebtiamal@twinlisbet.com
À: Poitras, Guy, D'Addona, Gabriel
Pièces jointes: image001[7].png, 500-06-001426-259_Amended_ChloeSabourin_OpenAI_march20_2026__.pdf, Demande_permission_modifier_autorisation_500-06-001426-259.pdf

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

DATE DE L'ENVOI : Le 20 mars 2026

DESTINATAIRE :

Avocat :	Me Guy Poitras / Me Gabriel D'Addona
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Notre référence :	10012025

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 :	1. Demande pour permission de modifier la Demande d'autorisation d'exercer une action collective 2. Demande modifiée pour autoriser l'exercice d'un recours collectif et nommer le statut de représentant du demandeur
Nombre total de pages : **Nom du document :**	46 pages total 500-06-001426-259_Amended_ChloeSabourin_OpenAI_march20_2026__ Demande_permission_modifier_autorisation_500-06-001426-259

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Lawyer | Avocate
Membre des Barreaux du Québec et de l'Ontario | Member of the Bars of Québec and Ontario

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Confirmation de la transmission des documents

Succès

Vos documents ont bien été transmis.

Numéro de demande : 2026-PROC-00106269

Date et heure de transmission : 2026-03-20 16:12:46

Numéro de dossier judiciaire : 500-06-001426-259

Titre : Demande de modification d'une demande d'autorisation d'exercer une action collective + permission + notification

Aucun courriel de confirmation ne sera transmis. Il est recommandé d'imprimer cette page en vue de conserver ces informations pour vos dossiers.

Si des frais judiciaires sont prescrits pour le dépôt d'un acte de procédure ou d'un document, celui-ci ne sera légalement reçu que lorsque les frais judiciaires auront été acquittés en totalité. Le cas échéant, le greffe vous transmettra un avis de paiement par courriel.

Les documents sont traités durant les jours et les heures d'ouverture des greffes de la Cour supérieure et de la Cour du Québec dans un délai de 24h à 48h ouvrables suivant leur transmission en tenant compte des jours fériés, les demandes urgentes étant priorisées dans un délai de moins de 24h.

Pour le dépôt d'un acte de procédure ou d'un document en matière civile ou jeunesse, votre paiement devra être acquitté au plus tard 2 jours après la notification de l'avis de paiement pour que votre document soit considéré comme reçu à la date de son dépôt au greffe.