

C A N A D A
PROVINCE OF QUÉBEC
DISTRICT OF MONTRÉAL
No. 500-06-000014-262

SUPERIOR COURT
(Class Action Division)

ALESSANDRO VELLUCCI

Plaintiff

-v-

GOEASY LTD.

- and -

VYCO LTD.

- and -

DONALD K. JOHNSON

- and -

DAVID INGRAM

- and -

KAREN BASIAN

- and -

DAVID HARRY APPEL

- and -

SEAN MORRISON

- and -

HON. JAMES MOORE

- and -

TARA DEAKIN

- and -

JONATHAN TÉTRAULT

- and -

RADHIKA KAKKAR

- and -

JASON MULLINS

- and -

DAN REES

- and -

PATRICK ENS

- and -

HALIM KHOURI

- and -

FELIX WU

- and -

ALI METEL

- and -

JASON APPEL

- and -

MICHAEL EUBANKS

- and -

ERNST & YOUNG LLP

Defendants

**DE BENE ESSE APPLICATION TO AMEND THE APPLICATION FOR
AUTHORIZATION**

(Art. 101, 206 and 585 of the *Code of Civil Procedure*)

**TO ONE OF THE JUDGES OF THE SUPERIOR COURT OF QUÉBEC SITTING IN THE
CLASS ACTION DIVISION, IN AND FOR THE DISTRICT OF MONTREAL, THE
PLAINTIFF ALLEGES AS FOLLOWS:**

1. The Plaintiff requests that this Court grant leave to amend his application for authorization, to the extent that such leave of the Court is required.
2. The Plaintiff instituted proceedings against the Defendants to commence a class action under the *Quebec Securities Act* ("**QSA**"), as appears from the court record.
3. These proceedings were initiated by the filing of an application for authorization on March 17, 2026, as appears from the court record.
4. On March 26, 2026, the Plaintiff amended the initial authorization application and served the amended application authorization on the Defendants, as appears from the court record.
5. Since then, all defendants have filed a response into the court record.
6. On or about July 8, 2026, the Plaintiff notified the Defendants with a second amended request for authorization to bring a class action (the "**Second Amended Application**").
7. The amendments of the Second Amended Application seek to, among other things: (i) plead three additional public corrective disclosures; (ii) provide additional details regarding the partial public corrective disclosures; (iii) adjust the definition of the class action accordingly; and (iv) further particularise the duties, breaches and misrepresentations of the Defendants, the whole as appears from the Second Amended Application.

8. Considering the nature of these amendments, they will not have any impact on the next steps of the proceedings. Nor is the request to amend untimely.
9. The amendments sought meet all requirements justifying such amendments, whether pursuant Art. 206 CPC or Art. 585 CPC.

FOR THESE REASONS, MAY IT PLEASE THE COURT TO:

GRANT the present *De Bene Esse Application to Amend the Application for Authorization*;

AUTHORIZE the Plaintiff to amend his application for authorization in the form of the *Second Amended Request for Authorization to Bring an Action Pursuant to Section 225.4 of the Québec Securities Act and Application for Authorization to Institute a Class Action and to Obtain the Status of Representative*;

THE WHOLE without costs, unless contested.

TORONTO, July 8, 2026



ROCHON GENOVA

Counsel for Plaintiffs

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Me Peter Jervis

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MONTREAL, July 8, 2026



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ALESSANDRO VELLUCCI

Plaintiff

-v-

GOEASY LTD. ET AL

Defendants

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(Art. 101, 206 and 585 of the *Code of Civil Procedure*)

ORIGINAL

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