SUPERIOR COURT
(Class Action)

CANADA
PROVINCE OF QUEBEC
DISTRICT OF MONTREAL

No.: 500-06-001196-225

CHRISTIAN LERAY

Plaintiff

v.

META PLATFORMS INC.

Defendant

DEFENDANT'S APPLICATION FOR LEAVE
TO EXAMINE CLASS MEMBERS
(Art. 587 CCP)

TO THE HONOURABLE JUDGE OF THE SUPERIOR COURT, SITTING IN AND FOR THE DISTRICT OF MONTREAL, THE DEFENDANT STATES AS FOLLOWS:

I. INTRODUCTION

1. Defendant Meta Platforms Inc. (the "**Defendant**") seeks leave from this Court to conduct pre-trial examinations of twenty (20) class members.

2. These pre-trial examinations are necessary for the determination of the issues of law and fact to be decided collectively, particularly with respect to the alleged fault and damages. Notably, they are essential to ensure the Defendant's right to a full and complete defence and to allow for a fair debate on the merits.

II. PROCEDURAL BACKGROUND

3. The present class action claims that the Defendant's content moderation on Facebook during the COVID-19 pandemic constituted an unlawful and intentional violation of freedom of expression, protected by the *Quebec Charter of Human Rights and Freedoms.* The Plaintiff claims that the Defendant illegally censored, restricted, or sanctioned posts and users, thereby allegedly depriving both content creators and potential readers of access to information related to the COVID-19 pandemic.

4. On April 29, 2024, the Honourable Lukasz Granosik, j.s.c., rendered a decision authorizing the Plaintiff to institute the present class action (the "**Authorization Decision**") on behalf of the following class members:

> Toute personne, physique ou morale, qui a utilisé ou visité Facebook depuis le 15 mars 2020, et qui a vu ses affichages reliés directement ou indirectement à la pandémie de Covid-19, censurés ou qui, ayant voulu le faire, n'a pu prendre connaissance ou accéder à ces affichages, alors qu'elle résidait au Québec ou y avait un établissement (*our emphasis*)
>
> (the "**Class**")

5. At paragraph 48 of the Authorization Decision, this Court further specified that the Class description should exclude users "qui n'avaient aucune intention d'accéder à l'information en question ou qui étaient parfaitement d'accord avec la censure mise en place par Meta." Therefore, membership in the Class depends at least in part on the specific situation of each user, the purpose sought in publishing or accessing content, and the members' knowledge and/or acceptance of the Defendant's terms, which explicitly state that the Defendant can remove or restrict access to content that is in violation of its Terms of Service and that constitutes harmful conduct, as reflected in the Terms of Service in effect on July 25, 2021, filed herewith as **Exhibit M-1**.

6. In the Authorization Decision, this Court also determined that the class action would treat the following collective issues:

   a) Les règles de conflit du droit international privé québécois doivent-elles être écartées, en tout ou en partie, en vertu de l'article 3076 C.c.Q.?

   b) Les tribunaux québécois ont-ils compétence pour entendre l'action, que ce soit en vertu des articles 3148 ou 3149 C.c.Q. ou autrement?

   c) Le droit étranger doit-il être exclu et le droit québécois s'applique-t-il en tout ou en partie en vertu des articles 3081 ou 3117 C.c.Q.?

   d) Les règles de Facebook, incluant celles encadrant le contrôle du contenu pendant la pandémie de Covid-19 sont-elles inopposables aux membres, vu l'article 11.2 L.p.c.?

   e) Advenant que les règles de Facebook soient applicables, les clauses suivantes doivent-elles être annulées, parce qu'abusives ou contraires à l'ordre public :

      i. celles permettant à la défenderesse de contrôler le contenu jugé répréhensible en lien avec la pandémie de Covid-19?

      ii. celles accordant une limitation ou une exonération de responsabilité à la défenderesse?

   f) Les règles de Facebook et leur application portent-elles atteinte de façon injustifiée à la liberté d'expression des membres du groupe?

g) Le cas échéant, l'atteinte à la liberté d'expression est-elle illicite et intentionnelle?

h) Le contrôle du contenu effectué par Facebook est-il un comportement fautif générateur de responsabilité?

i) La faute de la défenderesse est-elle intentionnelle? La défenderesse peut-elle exclure ou limiter sa responsabilité, vu les articles 1474 et 1475 C.c.Q. et 10 L.p.c.?

j) L'article 272 L.p.c. permet-il l'octroi de dommages-intérêts punitifs, vu les manquements de la défenderesse aux articles 10, 11.2, 19.1 et 54.4 L.p.c.?

k) Quel est le quantum des dommages-intérêts compensatoires dus aux membres, selon que leur contenu ait été censuré ou qu'ils aient simplement été privés de visionner du contenu prohibé alors qu'ils souhaitaient le faire?

l) Quel est le quantum des dommages-intérêts punitifs dus aux membres - à l'exception des membres n'ayant pas de compte Facebook -, selon que leur contenu ait été censuré ou qu'ils aient simplement été privés de visionner du contenu prohibé alors qu'ils souhaitaient le faire?

(the "**Common Issues**")

7. On July 25, 2024, following the authorization of the class action, Plaintiff filed an Originating Application (the "**Application**") in which he seeks the Defendant's condemnation for moral damages and punitive damages.

8. On August 28, 2025, the Defendant proceeded with the pre-trial examination of the Plaintiff. As more fully detailed below, this examination confirmed that he is unable to shed sufficient light on several central allegations of the Application relating to the issues of law and fact to be dealt with collectively.

9. Indeed, despite the allegations contained in the Application, the Plaintiff confirmed that:

a) he has no knowledge of the contract binding him to the Defendant (Facebook's Terms of Service, the "**Terms of Service**" or "**Terms**");

b) he was unable to shed light on the alleged faults committed by the Defendant; and

c) he could not explain how these alleged faults resulted in damages.

10. Moreover, when read as a whole, the Application seems to suggest that the facts giving rise to the individual claim of each member of the Class are substantially the same as those giving rise to the Plaintiff's claim. However, this is not the case. The Plaintiff's situation is certainly unique in relation to the facts that are to be addressed collectively. He is an activist with an established following, who positioned himself as a spokesperson for a movement purportedly aimed at re-informing the public about the COVID-19 pandemic (« *réinformer le public relativement à la pandémie de Covid-19 en se basant*

sur les propos de médecins et scientifique »[1]). He also runs his business mostly on Facebook, as appears from the excerpts of the transcript of the Plaintiff's pre-trial examination dated August 28, 2025, communicated hereto as **Exhibit M-2**.[2]

11. This profile is not representative of most other Class members, who the Defendant assumes are generally ordinary individuals sharing posts sporadically with a smaller circle of friends on Facebook. As a result, the circumstances surrounding content moderation and its impact, if any, are objectively significantly different for the Plaintiff than for the vast majority of Class members.

12. The situation of no other member of the Class is described, or even mentioned, in the Application.

III. THE PRE-TRIAL EXAMINATIONS OF CLASS MEMBERS ARE NECESSARY TO THE COURT'S DETERMINATION OF ISSUES OF LAW AND FACT TO BE DEALT WITH COLLECTIVELY

13. The Defendant is seeking leave to examine twenty (20) Facebook users who were active on Facebook during the pandemic. Ten (10) of these users must identify with the Class described as having had their posts related directly or indirectly to the Covid-19 pandemic moderated, while the other ten (10) must identify with the portion of the Class who wished to access such posts but were unable to do so. This would allow the Defendant to understand, *inter alia*, the facts supporting the alleged fault and the existence and nature of any damages, and would assist the Court in determining whether collective recovery could be awarded.

14. The Defendant seeks leave to examine on the following topics:

A. <u>The Contract Binding the Class Members to the Defendant</u>

B. <u>The Alleged Faults Committed by the Defendant</u>

C. <u>The Alleged Damages Suffered</u>

A. <u>The Contract Binding the Class Members to the Defendant</u>

15. In the Application, the Plaintiff alleges that Facebook's Terms of Service, which bind the Defendant and the users, is a contract of adhesion, with its terms imposed without being directly brought to the users' attention. The Plaintiff further challenges the ability of the members to validly consent to the Terms of Service, alleging that the Defendant's policies are not written in clear, precise, and explicit terms. He also claims that these terms were changed unilaterally, all of which, according to him, constitute faults committed by the Defendant, entitling him and the Class members to compensatory and punitive damages.

16. Yet, the Plaintiff was unable to provide precise or relevant information regarding his actual knowledge of Facebook's Terms of Service, including those governing content moderation

[1] Paragraph 56 of the Application.

[2] Exhibit M-2: p. 24, l. 11 to 19; p. 25, l. 6 to 21, p. 51, l. 6 to 11.

during the COVID-19 pandemic, as well as how these rules were brought to his attention, agreed to, and understood.

17. When questioned on this matter during his examination on discovery, the Plaintiff was unable to specify which policies are targeted by these allegations, nor which terms are allegedly unclear, imprecise, or not explicit, simply because he has never read them. This is evident from the excerpts of the transcript of the Plaintiff's pre-trial examination dated August 28, 2025, communicated hereto as **Exhibit M-3**[3].

18. Even with respect to the changes made to Facebook's Terms, the Plaintiff was unable to identify which rules were changed, when they were changed, in what manner, or how these changes affected his use of Facebook, as he has never taken the time to read them, exhibit M-3.[4]

19. As a result, the Plaintiff was unable to answer any questions regarding his knowledge of the obligations incumbent upon him under Facebook's Terms of Service, or the information provided by the Defendant concerning moderation of the service and its ability to update the policies, all of which are alleged against the Defendant.

20. Moreover, when questioned about his understanding of Facebook's ability to moderate content, the Plaintiff provided inconsistent answers. At times, he claimed to believe that Facebook offered users an almost absolute freedom of expression[5]; at other times, he acknowledged that some content could, in fact, be moderated[6]. This is evident from the excerpts of the transcript of the Plaintiff's pre-trial examination dated August 28, 2025, communicated hereto as **Exhibit M-4.**

21. These inconsistencies make it difficult for the Defendant to prepare its defence on some of the Common Issues, as the present case is supposed to exclude all individuals who agreed with the Defendant's moderation policy, as appears from paragraphs 44 to 48 of the Authorization Decision.

22. In order to adequately address Common Issues d) and e), the Defendant must be permitted to examine additional Class members. In particular, the Defendant should be permitted to ask questions on the following topics:

    (i) The Class members' knowledge and understanding of the obligations incumbent upon them under Facebook's Terms of Service;

    (ii) The Class members' expectations regarding content moderation that could be carried out on Facebook and their knowledge of the information provided by the Defendant for this purpose;

    (iii) The knowledge of the Defendant's ability to change the Terms of Service and changes made to its various policies on Facebook;

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3 Exhibit M-3: p. 43, l. 24 to p. 46, l. 24; p. 56, l. 4 to p. 57, l. 11; p. 86, l. 23 to p. 87, l. 25; p. 228, l. 25 to p.230, l. 2.

4 Exhibit M-3: p. 92, l. 24 to p.93, l. 20; p. 95, l. 9 to l. 16.

5 Exhibit M-4: p. 32, l. 18 to p. 34, l. 6.

6 Exhibit M-4: p. 86, l. 23 to p. 88, l. 14.

23. In preparing its defence to the Application, the Defendant must be able to verify and test, with other members of the Class, their knowledge, understanding, and acceptance of the rules by class members, which are central elements to Common Issues d) and e).

B. <u>The Alleged Faults Committed by the Defendant</u>

24. The Plaintiff alleges that the Defendant's agreed-upon Terms and content moderation policies restrict users' freedom of expression.

25. In order to discharge his burden of proof regarding the alleged fault, the Plaintiff must establish that the Defendant, through its moderation, engaged in conduct that departed from the standard of a reasonable person placed in similar circumstances.

26. In the specific context of an alleged violation of freedom of expression, the Plaintiff also bears the burden of demonstrating that the interference with this right was not trivial or insubstantial, but rather serious and significant, and that the Defendant's conduct objectively infringed upon his freedom of expression beyond this threshold.

27. The Defendant intends to demonstrate at trial that its content moderation did not substantially interfere with the fundamental rights of Class members, notably because they did not prevent individuals from holding, expressing, or communicating their ideas through other means.

28. When asked how these policies interfered with his ability to express himself, the Plaintiff admitted that he remained entirely free to share his views through a wide range of other mediums and was even able to reach a considerable audience, as appears from the excerpts of the transcript of the Plaintiff's pre-trial examination dated August 28, 2025, communicated hereto as **Exhibit M-5**.[7]

29. To allow the Defendant to present evidence and verify the allegations of fault, it is necessary for the Defendant to examine a sufficient and representative sample of Class members in order to determine:

    (i) The use that Class members made of Facebook during the pandemic and their general ability to exercise freedom of expression during that period;

30. Moreover, as indicated above, the Plaintiff himself acknowledged that some degree of content moderation is necessary and, at times, even desirable, and indicated that he agreed with certain of the Defendant's content moderation practices, as appears from the excerpts of the transcript of the Plaintiff's pre-trial examination dated August 28, 2025, communicated hereto as **Exhibit M-6**.[8] Yet, in the Application, the Defendant's content moderation on Facebook is broadly criticized, without specifying which moderation practices are allegedly wrongful or give rise to liability.

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[7] Exhibit M-5: p.101, l. 12 to l. 25; p. 104, l. 11 to l. 21; p. 152, l. 24 to p. 154, l. 19; p. 156, l. 1 to p. 157, l. 3; p. 157, l. 15 to p. 159, l. 5; p. 160, l. 1 to l. 2; p. 160, l. 9 to p. 163, l. 14; p. 167, l. 21 to p. 169, l. 17; p. 172, l. 4 to l. 24; p. 173, l. 20 to p. 174, l. 3; p. 174, l. 16 to p. 176, l. 22; p. 178, l. 11 to l. 25; p. 185, l. 6 to p. 189, l. 9; p. 245, l. 7 to p. 246, l. 19; p. 291, l. 18 to p. 292, l. 20; p. 311, l. 20 to p. 317, l. 16; p. 332, l. 21 to p. 333, l. 7.

[8] Exhibit M-6: p. 84, l. 13 to p.86, l. 9; p. 310, l. 8 to p.311, l. 19.

31. In order to present a full and complete defence, the Defendant must be able to examine a sufficient and representative sample of Class members in order to determine:

    (i) Which forms of content moderation are at issue

32. This will allow the Defendant to ascertain which forms of content moderation are alleged to give rise to liability, especially in a context where the Application does not clearly identify which moderation practices are at issue, and where the representative Plaintiff was unable to answer this question, while also admitting that certain forms of moderation are necessary.

33. The issue of liability, which is the subject of Common Issues f) and h) cited above, is fundamental to the present litigation, and the requested examinations will enable the Court to rule on this issue at trial.

34. The information sought through the requested examinations of Class members is likely to advance the debate on the Common Issues.

C. <u>The Alleged Damages Suffered</u>

35. The present class action is based on the alleged infringement of rights protected by the *Quebec Charter of Human Rights and Freedoms*.

36. As such, it is necessary for the Plaintiff to prove the existence of damages in order to succeed in his action. This requirement is reflected in Common Issue k).

37. In the Application, the Plaintiff states at paragraph 32 that those expressing opinions or facts significantly contradicting health or government authorities have been denigrated, ostracized, and subjected to numerous prejudices or negative stereotypes.

38. It is further stated that the members who were targeted by content moderation experienced public humiliation, since the Defendant, by this very act, allegedly conveyed the message that their statements were false, dangerous, and unacceptable, and that they belonged to a minority of outcasts who do not think correctly and are not worthy of respect:

> 47. En effet, les membres qui ont été censurés ont vécu une forme d'humiliation publique puisque cela envoyait le message que leurs propos étaient faux, dangereux, et inacceptables et qu'ils faisaient donc partie de cette minorité d'infréquentables qui ne pensent pas correctement, qui ne sont pas dignes de respect, et dont les faits ou opinions qu'ils partagent sur la Covid-19 et les vaccins ne méritent pas d'être propagés ou débattus au même titre que n'importe quelle autre fait ou opinion.

39. This allegedly had the effect of undermining the dignity of the members and provoking feelings of rejection, anger, injustice, and incomprehension.

40. However, when questioned about his damages, the Plaintiff reported that he suffered no real impact from the Defendant's content moderation. He stated that he actually gained more friends on his personal Facebook page (i.e. new followers) during the pandemic

years[9] and formed new friendships during that period[10]. More importantly, his examination revealed that it was the content that was actually seen by other users which led to disparaging remarks, not the Defendant's content moderation[11]. These remarks occurred in private contexts and not in public settings[12], as reflected in excerpts from the Plaintiff's pre-trial examination dated August 28, 2025, communicated hereto as **Exhibit M-7**.

41. Regarding the Class members who allegedly could not access or view content which they would have liked to see, the Plaintiff has no personal knowledge of such a situation.[13]

42. The Defendant is entitled to verify the existence of the various alleged damages. However, the Plaintiff's examination did not provide sufficient insight into the damages claimed in the Application, as the Plaintiff simply did not experience them.

43. The examination of class members will therefore also be useful, and, in the circumstances, necessary to allow the Court to decide Common Issue k), specifically on the following subjects:

    (i) What type of content the member of the Class thinks would have been available and would have liked to see, but was deprived of viewing;

    (ii) The manifestation of the alleged harm and the damages suffered.

44. The requested examinations will also be useful to determine whether the claims of class members can be liquidated through collective recovery, which is expressly denied by the Defendant.

IV. THE PROPOSED EXAMINATION MODALITIES

45. The Defendant requests that Plaintiff be ordered to (i) confirm the number of members on the registered list who meet the following broad categories, and (ii) communicate this list of registered class members to the Defendant:

    a) Members who had their posts related directly or indirectly to the COVID-19 pandemic moderated; and

    b) Members who wished to access such identified posts but were unable to do so.

46. Once this list has been provided, the parties shall have forty-five (45) days to agree on the sample of twenty (20) members of the Class, divided equally between these two categories, to be examined pursuant to the judgment to be rendered on the present application, failing which this Court shall select, at random, said members of the Class.

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9 Exhibit M-7: p. 39, l. 6 to p. 40, l. 9.

10 Exhibit M-7: p. 342, l. 25 to p. 343, l. 7; p. 344, l. 6 to l. 14.

11 Exhibit M-7: p. 330, l. 1 to 18; p. 331, l. 11 to p. 332, l. 10; p. 333, l. 3 to p. 334, l. 7; p. 334, l. 13 to p. 335, l. 13; p. 340, l. 11 to p. 341, l. 17; p. 342, l. 12 to p. 344, l. 3.

12 Exhibit M-7: p. 335, l. 14 to l. 23; p. 336, l. 7 to p. 337, l. 4.

13 Exhibit M-7: P. 339, l. 3 to p.340, l. 2.

47. The Defendant seeks leave to conduct an examination of these members of the Class for no longer than two (2) hours each, on the following topics:

A. The Contract Binding the Class Members to the Defendant

(i) The Class members' knowledge and understanding of the obligations incumbent upon them under Facebook's Terms of Service;

(ii) The Class members' expectations regarding moderation that could be carried out on Facebook and their knowledge of the information provided by the Defendant for this purpose;

(iii) The knowledge of the Defendant's ability to change the Terms of Service and changes made to its various policies on Facebook;

B. The Alleged Faults Committed by the Defendant

(i) The use that Class members made of Facebook during the pandemic and their general ability to exercise freedom of expression during that period;

(ii) Which forms of content moderation are at issue;

C. The Alleged Damages Suffered

(i) What type of content the member of the Class thinks would have been available and would have liked to see, but was deprived of viewing;

(ii) The manifestation of the alleged harm and the damages suffered.

48. Given the overall size and complexity of the litigation, the examinations respect the principles of proportionality and proper administration of justice.

FOR THESE REASONS, MAY IT PLEASE THE COURT TO:

GRANT the Defendant Meta Platforms Inc's Application for Leave to Examine Class Members;

AUTHORIZE the Defendant Meta Platforms Inc. to examine a sample of twenty (20) registered class members to be selected jointly by the parties within forty-five (45) days of this judgment, for a duration of 120 minutes each on the following topics:

A. The Contract Binding the Class Members to the Defendant

B. The Alleged Faults Committed by the Defendant

C. The Alleged Damages Suffered

ORDER the Plaintiff to provide the Defendant's lawyers, within fifteen (15) days of this judgment, with the list of members who registered with the Plaintiff's lawyer, for the purpose of jointly selecting a sample of twenty (20) registered class members to be examined pursuant to this judgment;

DECLARE that if the parties fail to agree on the identity of the class members to be examined, the parties shall submit to the undersigned the list of members who registered with the Plaintiff's lawyer from which the members will be randomly selected;

DECLARE that objections regarding relevance must be made under reserve, in accordance with the provisions of article 228 C.p.c., and submitted for subsequent adjudication to the undersigned;

RENDER any other order required to facilitate such examinations;

THE WHOLE with costs to follow.

Montreal, July 24, 2026

McCarthy Tétrault LLP

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Me Charlotte Simard-Zakaïb
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ALL NOTIFICATIONS BY E-MAIL MUST BE ADDRESSED SOLELY TO NOTIFICATION@MCCARTHY.CA

File reference: 204930-565088

NOTICE OF PRESENTATION

TO: Mtre William Desrochers
VIRTULEX AVOCATS
69 Gabriel-Lacasse Street
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Tel.: 819-303-0574 / 819-743-2955
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Lawyers for Plaintiff,
Christian Leray

TAKE NOTICE that the present *Defendant's Application for Leave to Examine Class Members* will be presented before the Superior Court at the Montreal Courthouse, located at 1 Notre-Dame East, in the city and district of Montreal, on a date to be determined by the Honorable Lukasz Granosik.

Montreal, July 24, 2026

McCarthy Tétrault LLP

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SUPERIOR COURT
(Class Action)

CANADA
PROVINCE OF QUEBEC
DISTRICT OF MONTREAL

No.: 500-06-001196-225

CHRISTIAN LERAY

Plaintiff

v.

META PLATFORMS INC.

Defendant

LIST OF EXHIBITS

(Defendant's Application for Leave to Examine Class Members (Art. 587 CCP))

Exhibit M-1:	Defendant's Terms of Service in effect on July 25, 2021;
Exhibit M-2:	Excerpts of the Transcript of the Plaintiff's Pre-Trial Examination dated August 28, 2025 - Plaintiff's Business;
Exhibit M-3:	Excerpts of the Transcript of the Plaintiff's Pre-Trial Examination dated August 28, 2025 - The Reading of the Defendant's Terms of Service;
Exhibit M-4:	Excerpts of the Transcript of the Plaintiff's Pre-Trial examination dated August 28, 2025 - Plaintiff's Understanding of Defendant's Ability to Moderate Content;
Exhibit M-5:	Excerpts of the Transcript of the Plaintiff's Pre-Trial Examination dated August 28, 2025 - Plaintiff's Ability to Express Himself Through Other Mediums;
Exhibit M-6:	Excerpts of the Transcript of the Plaintiff's Pre-Trial Examination dated August 28, 2025 - Content Moderation;
Exhibit M-7:	Excerpts of the Transcript of the Plaintiff's Pre-Trial Examination dated August 28, 2025 - Plaintiff's Damages.

Montreal, July 24, 2026

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SUPERIOR COURT (Class Actions Division)
PROVINCE OF QUÉBEC
DISTRICT OF MONTREAL

CHRISTIAN LERAY

Plaintiff

v.

META PLATFORMS INC.

Defendant

DEFENDANT'S APPLICATION FOR LEAVE TO EXAMINE CLASS MEMBERS (Art. 587 CCP), NOTICE OF PRESENTATION AND LIST OF EXHIBITS

ORIGINAL

Mtre Samuel Lepage, Mtre Charlotte Simard-Zakaïb and Anita Badaku-Kpalley
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