

CANADA
PROVINCE OF QUÉBEC
DISTRICT OF MONTRÉAL

SUPERIOR COURT
(Class Action Chamber)

N° : 500-06-001132-212

GABRIEL BOURGEOIS,

Applicant

v.

**ELECTRONICS ARTS INC.,
ELECTRONICS ARTS (Canada) INC.,
ACTIVISION BLIZZARD INC.,
ACTIVISION PUBLISHING INC.,
BLIZZARD ENTERTAINMENT INC.,
TAKE TWO INTERACTIVE SOFTWARE INC.,
TAKE TWO INTERACTIVE CANADA HOLDINGS
INC.,
2K GAMES INC.,
ROCKSTAR GAMES INC.,
WARNER BROS. ENTERTAINMENT INC.,
WARNER BROS ENTERTAINMENT CANADA
INC.,
WARNER BROS. HOME ENTERTAINMENT INC.,
UBISOFT ENTERTAINMENT SA,
UBISOFT INC.,
UBISOFT ENTERTAINMENT INC./UBISOFT
DIVERTISSEMENTS INC.,
MICROSOFT CORPORATION,
MICROSOFT CANADA INC.,
EPIC GAMES INC.,
EPIC GAMES CANADA ULC,
SCOPELY INC.,
NIANTIC INC.,
KING DIGITAL ENTERTAINMENT GROUP INC.,
KING.COM LTD.,
ZYNGA INC.,
ZYNGA GAME CANADA LTD.,**

Respondents

**APPLICATION BY RESPONDENTS ACTIVISION BLIZZARD INC.,
ACTIVISION PUBLISHING INC., BLIZZARD ENTERTAINMENT INC.,
KING DIGITAL ENTERTAINMENT GROUP INC., AND KING.COM LTD.
FOR DECLINATORY EXCEPTION IN ORDER TO PARTIALLY DISMISS
THE AMENDED APPLICATION FOR AUTHORIZATION TO INSTITUTE A
CLASS ACTION
(Art. 166 and 167 CCP and Art. 3148 CCQ.)**

TO THE HONOURABLE JUSTICE STÉPHANE LACOSTE, OF THE SUPERIOR COURT, SITTING IN AND FOR THE DISTRICT OF MONTREAL, THE RESPONDENTS ACTIVISION BLIZZARD INC., ACTIVISION PUBLISHING INC., BLIZZARD ENTERTAINMENT INC., KING DIGITAL ENTERTAINMENT GROUP INC., AND KING.COM LTD. RESPECTFULLY SUBMIT THE FOLLOWING:

I. INTRODUCTION

1. The Respondents, Activision Blizzard Inc., Activision Publishing Inc., Blizzard Entertainment Inc., King Digital Entertainment Group Inc. and King.com Ltd. (collectively, **Activision**), respectfully seek:
 - a) An order partially dismissing the *Amended Application for Authorization to Institute a Class Action & to Obtain the Status of Representative Plaintiff (Amended Application)* as against them with respect to the claims of non-residents of Quebec, given the Quebec courts' lack of jurisdiction over these claims in the present proceedings; and
 - b) As a result, an order excluding non-residents of Quebec from the class proposed in the Amended Application.

II. THE APPLICANT'S CLAIM

2. On or about March 2, 2021, the Applicant filed an application to authorize the bringing of a class action against twenty-five (25) Respondents operating in the video game industry and to obtain the status of representative plaintiff.
3. On or about October 15, 2021, the Applicant filed its Amended Application and, on December 7, 2021, this Court partially authorized the amendments sought, but replaced the Applicant's proposed class by the following class definition (the **Proposed Class**):

All Canadian customers of the Lootbox Respondents (defined further below) who purchased or otherwise paid directly or indirectly for loot boxes in any of the games set out in Schedule A to this Application for Authorization between 2008 and the date this action is authorized as a class proceeding, except such Canadian customers otherwise already included in class description in either one of the following cases *Cunningham et al v. Activision Blizzard Inc. et al*, SCBC S-2013414, *Lussier et al v. Scopely Inc.*, SCBC S-2013510, *Pechnik et al v. Take Two Interactive Software Inc. et al*. SCBC S-211073, *Sutherland v. Electronic Arts Inc. et al*, SCBC S-209803, *Petty et al v. Niantic Inc. et al*, SCBC S-213723.

4. The Applicant asserts that the members of the Proposed Class are entitled to restitution, compensatory, and punitive damages resulting from the Respondents' offering and operating "loot boxes" in their respective video games in violation of the *Criminal Code*, RSC 1985, c C-46.
5. The Applicant describes "loot boxes" as "a consumable virtual item which can be redeemed (or "opened") to receive a randomized selection of further virtual items, ranging from simple customization options for a player's avatar or character, to game-changing equipment or additional avatars/characters (with effects on gameplay, including relative to other players)" (**Loot Boxes**).

III. LACK OF JURISDICTION OVER THE CLAIMS OF NON-RESIDENTS OF QUEBEC

6. Activision respectfully submits that the Quebec courts lack jurisdiction over this case with respect to the claims of non-residents of Quebec, as none of the connecting factors provided by article 3148 CCQ apply for these members of the Proposed Class.

7. First, with respect to the criterion of domicile under paragraph 1(1) of article 3148 CCQ, the Amended Application does not establish that the Activision Respondents have their domicile or residence in Quebec. On the contrary, the Amended Application asserts that:
 - a) The Respondent Activision Blizzard Inc. is “a company incorporated under the laws of Delaware, with an address for service at 251 Little Falls Drive, Wilmington, New Castle, Delaware, 19808” (Exhibit P-3);
 - b) The Respondent Activision Publishing Inc. is “a company incorporated pursuant to the laws of Delaware, with an address for service at 251 Little Falls Drive, Wilmington, New Castle, Delaware, 19808” (Exhibit P-4) and “a business address at 3100 Ocean Park Blvd, Santa Monica, California, 90405”;
 - c) The Respondent Blizzard Entertainment Inc. is “a company incorporated pursuant to the laws of Delaware with an address for service at 251 Little Falls Drive, Wilmington, New Castle, Delaware, 19808” (Exhibit P-5) and “a business address at 16251 Alton Parkway, Irvine, California, 92618”;
 - d) The Respondent King Digital Entertainment Group Inc. is “a company incorporated under the laws of Delaware” and “has an address for service at Incorporating Services Ltd, 3500 South Dupont Highway, Dover, Delaware, 19901”; and
 - e) The Respondent King.com Ltd is “a company incorporated under the laws of Malta.” It has “an address for service at Aragon House Business Center, Dragonara Rd, St Julians, Malta, STJ 3140” and its “principle place of business is located at 178 Wardour St, Soho, London, England, United Kingdom, W1F 8FY”.
8. Secondly, the Amended Application does not allege the presence of any establishment of the Activision Respondents in Quebec relating to the dispute, and jurisdiction of the Quebec courts is therefore not justified under paragraph 1(2) of article 3148 CCQ.
9. Regarding paragraph 1(3) of article 3148 CCQ, the Amended Application contains no allegation to the effect that the members of the Proposed Class residing outside Quebec suffered an injury in Quebec, that a fault affecting these non-residents of Quebec was committed in Quebec, or that a contractual obligation owed to these non-residents of Quebec was to be performed in Quebec.
10. Fourth, the Amended Application does not establish any agreement by which the parties would have directed any disputes to the jurisdiction of Quebec courts under paragraph 1(4) of article 3148 CCQ.
11. Finally, the Activision Respondents never submitted to the jurisdiction of the Quebec courts in regard of the claims of non-residents of Quebec (paragraph 1(5) of article 3148 CCQ) and have reserved their rights to contest the jurisdiction of Quebec courts from the outset of the present proceedings.
12. In short, the claims brought by members of the Proposed Class residing outside Quebec do not qualify under any of the connecting factors of article 3148 CCQ required to ground jurisdiction in Quebec.
13. The Activision Respondents thereby seek that this case against them be partially dismissed in respect of non-residents of Quebec and that the Proposed Class be limited to members residing in Quebec.

WHEREFORE MAY IT PLEASE THIS COURT TO:

GRANT the present Application;

PARTIALLY DISMISS the *Amended Application for Authorization to Institute a Class Action & to Obtain the Status of Representative Plaintiff* as against Activision Blizzard Inc., Activision Publishing Inc., Blizzard Entertainment Inc., King Digital Entertainment Group Inc. and King.com Ltd. in respect of the claims of the members of the Proposed Class who do not reside in Quebec;

EXCLUDE the members residing outside Quebec from the Proposed Class;

THE WHOLE without costs, except in the event of contestation.

Montréal, December 23, 2021

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(Mtres. Eric C. Lefebvre and Olivier V. Nguyen)

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TAKE NOTICE that the present *Application for Leave to Submit Relevant Evidence* will be presented for hearing and allowance on a date and time and place to be determined by the Honorable Justice Stéphane Lacoste of the Superior Court of Québec.

DO GOVERN YOURSELVES ACCORDINGLY.

Montréal, December 23, 2021

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Objet: NOTIFICATION Application by Activision and King Respondents for Declaratory Exception for lack of jurisdiction over Non-Quebec residents / Gabriel Bougeois v. Electronics Arts Inc. and al. / No: 500-06-001132-212 [NRFC-EDMRS.FID12710805]
Pièces jointes: Application by Activision and King Respondents for Declaratory Exception for lack of jurisdiction over Non-Quebec residents.pdf

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**NOTIFICATION PAR COURRIEL / NOTIFICATION BY EMAIL
(Articles 133 et/and 134 C.p.c. / C.C.P.)**

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**SUPERIOR COURT
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GABRIEL BOUGEOIS,

Applicant

- v. -

ELECTRONICS ARTS INC. ET ALS.,

Respondents

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