

**CLASS ACTION CONCERNING ALLEGED DISCRIMINATION RELATING TO
EMPLOYMENT AND HOUSING ADVERTISEMENTS ON FACEBOOK**

Beaulieu v. Facebook, Inc.
(Court File No. 500-06-000993-192)

**IF YOU WERE INTERESTED IN RECEIVING ADVERTISEMENTS FOR EMPLOYMENT
OR HOUSING ON FACEBOOK AND YOU ARE LOCATED IN QUEBEC, YOU MAY BE
A MEMBER OF A CLASS ACTION**

AUTHORIZATION TO INSTITUTE A CLASS ACTION

On December 22, 2022, the Quebec Court of Appeal authorized Ms. Lyse Beaulieu (the "**Representative**") to institute a class action against Facebook, Inc. (now Meta Platforms, Inc.) and Facebook Canada Ltd. (collectively, "**Facebook**" or the "**Defendants**").

This class action, which is being brought in the District of Montreal (Court File No. 500-06-000993-192), seeks to obtain the payment of moral and punitive damages for alleged violations of certain provisions of the Quebec *Charter of Human Rights and Freedoms* (the "**Quebec Charter**"). It also seeks an injunction to prohibit Facebook from allegedly facilitating the discriminatory distribution of advertisements.

WHO IS INCLUDED?

The following individuals are members of the class action:

All Facebook users located in Quebec who were seeking employment or housing or that were interested in receiving advertisements in employment or housing and who, as a result of their race, sex, or age, were excluded by Facebook's advertising services from receiving advertisements for employment or housing opportunities on Facebook, between April 11, 2016 and December 22, 2022 (the "**Class**").

Therefore, to be a member of the Class, you must meet the **two following conditions**:

1. You were residing in Quebec and had a Facebook account at some point between **April 11, 2016, and December 22, 2022**.
2. During that time, you were interested in receiving employment or housing advertisements on Facebook or you were seeking employment or housing.

In addition to the two conditions mentioned above, Class members are people who allegedly were excluded from receiving certain employment and housing ads on Facebook because of their race, sex, or age.

The Plaintiff alleges that this exclusion operates in two ways. First, third-party advertisers (*i.e.* the employers or lessors) allegedly used Facebook's advertising tools to prevent some Facebook users from receiving employment or housing ads on Facebook based on their race, age, or sex. Second, even in the absence of alleged exclusion chosen by the advertiser, Facebook's algorithms allegedly prevented users from seeing employment or housing ads on Facebook based on race, sex, or age. Whether any such allegations actually occurred and affected anyone has not yet been determined and will ultimately be decided by the judge at trial.

To become a member of the class action, you don't have to do anything: you are automatically included in the class action if your situation corresponds to the Class described above.

If you are a member of the Class and you do not request to be excluded from the class action, any judgment entered in the class action or any settlement agreement approved by the Court will apply to you.

A Class member may not be called upon to pay the legal costs of this class action unless he or she chooses to intervene.

You do not have to intervene to be entitled to compensation. However, you may ask the Court to intervene in support of the Representative's claim. Your request must be approved by the Court; it will only be approved if the Court concludes that your intervention will be useful to the progress of the proceedings.

EXCLUSION

If you do not want the judgment in the class action to apply to you, you must opt out **no later than November 10, 2025**. If you do so, you will not be entitled to compensation, if any, if the class action is successful or if a settlement agreement is reached by the parties.

To exclude yourself, you must complete the opt-out form below and send it to the clerk of the Superior Court of Quebec, no later than November 10, 2025.

A member who has filed a personal lawsuit based on the same cause of action against one of the Defendants shall be deemed to exclude himself or herself from the class action if he or she does not discontinue the claim **by November 10, 2025**.

Any member who has not opted out by the opt-out deadline shall be bound by any judgment entered in the class action and shall be deemed to have waived any right to sue the Defendants personally.

NEXT STEPS

The judgment authorizing the class action ended a preliminary stage. This judgment did not decide the merits of the action against the Defendants, who deny any liability and intend to present their defenses at trial.

It could take approximately three years to go to trial. After the hearing on the merits, the Superior Court will decide whether the Defendants should compensate the Class members.

The main issues that will be addressed in this class action are:

- i. Did Facebook breach class members' rights under the Quebec *Charter of Human Rights and Freedoms* by allowing and facilitating the use of its advertising services to exclude individuals from viewing advertisements for employment or housing opportunities on the basis of their race, sex, or age?
- ii. Did Facebook breach class members' rights under the Quebec *Charter of Human Rights and Freedoms* by delivering employment or housing advertisements preferentially to certain individuals on the basis of their race, sex, or age?
- iii. Is Facebook liable to the class members for moral damages, and if so, in what amount?
- iv. Is Facebook liable to the class members for punitive damages, and if so, in what amount?
- v. Should an injunction be issued to prohibit Facebook from allowing and/or facilitating the discriminatory targeting of advertisements based on race, sex, or age with respect to employment and housing opportunities?

The conclusions sought by the Representative are as follows:

- I. **CONDAMN** Facebook, Inc. and Facebook Canada Ltd. to pay to each member of the class an amount to be determined for moral damages, and **ORDER** collective recovery of these sums;

II. **CONDEMN** Facebook, Inc. and Facebook Canada Ltd. to pay to each member of the class an amount to be determined for punitive damages, and **ORDER** collective recovery of these sums;

III. **CONDEMN** Facebook, Inc. and Facebook Canada Ltd. to pay legal interest and additional indemnity on the above amounts from the date of service of the *Application for Authorization to Institute a Class Action*;

IV. **CONDEMN** Facebook, Inc. and Facebook Canada Ltd. to bear the costs of the present action including the costs associated with all notices;

V. **ISSUE** an injunction prohibiting Facebook, Inc. and Facebook Canada Ltd. from allowing and/or facilitating the discriminatory targeting or delivery of advertisements based on race, sex, or age with respect to employment and housing opportunities;

VI. **RENDER** any other order that the Court shall determine and that is in the best interests of the class members.

QUESTIONS AND ADDITIONAL INFORMATION:

For information on the progress of the case, please visit the website of the Representative's lawyers, IMK LLP: <https://imk.ca/en/class-actions/>

You may also contact the Representative's lawyers at the following address:

IMK LLP
Place Alexis Nihon | Tower 2
3500 De Maisonneuve Boulevard West
Suite 1400
Montreal, Quebec H3Z 3C1
facebook.actioncollective@imk.ca
Tel: 514 934-7740
Fax: 514 935-2999

THIS NOTICE HAS BEEN AUTHORIZED BY THE SUPERIOR COURT OF QUEBEC

OPT-OUT FORM

Class action 500-06-000993-192

Beaulieu v. Facebook, Inc.

I, the undersigned, _____, understand that I am a member of the class described in the class action.

I hereby confirm my desire to be excluded from the class action and understand that I will not be bound by a final judgment in this proceeding.

And I have signed this _____

Signature

This form may be submitted directly to the Clerk of the Superior Court (in person, by mail, by registered mail or by certified mail) at the following address:

Greffé civil de la Cour supérieure
PALAIS DE JUSTICE DE MONTRÉAL
1, rue Notre-Dame Est
Montréal (Québec) H2Y 1B6

No. 500-06-000993-192