

CANADA

(Class Action)
SUPERIOR COURT

PROVINCE OF QUEBEC
DISTRICT OF MONTREAL

A. GAUTHIER

NO: 500-06-000010-260

Plaintiff

-vs.-

STARBUCKS COFFEE CANADA, INC., legal person, duly constituted, having its head office at 1205-5140 Yonge St., City of North York, Province of Ontario, M2N 6L7

and

STARBUCKS CORPORATION, legal person, duly constituted, having its head office at 2410, Utah Avenue South, City of Seattle, State of Washington, 98134, U.S.A.

Defendants

**APPLICATION TO AUTHORIZE THE BRINGING OF A CLASS ACTION & TO
APPOINT THE PLAINTIFF AS REPRESENTATIVE PLAINTIFF
(Art. 574 C.C.P and following)**

TO ONE OF THE HONOURABLE JUSTICES OF THE SUPERIOR COURT, SITTING IN AND FOR THE DISTRICT OF MONTREAL, YOUR PLAINTIFF STATES AS FOLLOWS:

I. GENERAL PRESENTATION

A) The Action

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

- All persons residing in Quebec who purchased Starbucks-branded coffee products (the “Coffee Products”) or any other group to be determined by the Court;

2. For years, Starbucks has built substantial consumer trust by presenting itself as an ethical leader in the coffee industry. Starbucks markets its products as “Committed to 100% Ethical Coffee Sourcing” and prominently promotes its proprietary Coffee and Farmer Equity (“C.A.F.E.”) Practices program as the cornerstone of its ethical sourcing approach;
3. This class action seeks to hold Starbucks accountable for:
 - (a) Misleading consumers regarding the ethical sourcing of its coffee products, including representations that all Starbucks coffee beans are sourced without serious labour-rights abuses, and
 - (b) Failing to disclose the presence of certain volatile organic compounds (VOCs), including benzene, toluene, and methylene chloride, in its decaffeinated coffee products;
4. Starbucks’ representations appear on product packaging, websites, and other consumer-facing materials. Starbucks relies on these representations, and the C.A.F.E. logo, to suggest that coffee farms are fully compliant with ethical standards, that labour abuses are effectively prevented, and that violations are promptly remediated.
5. Independent investigations and audits by journalists, human-rights organizations, and government agencies reveal repeated labour violations on C.A.F.E.-certified farms, including forced labour, child labour, unsafe working conditions, and wage theft.
6. Starbucks has maintained its ethical sourcing representations despite being repeatedly notified of these violations and, in some cases, failing to take remedial action. These ongoing representations create a net impression to consumers that Starbucks coffee is fully ethically sourced, when in fact it is not.
7. Additionally, independent testing of certain Starbucks decaffeinated coffee products has revealed the presence of VOCs at levels inconsistent with normal coffee production and likely to surprise reasonable consumers. Starbucks does not disclose this information at the point of sale, constituting a material omission likely to mislead consumers;
8. The Plaintiff alleges that Starbucks:
 - (a) Made misleading representations regarding ethical sourcing, and
 - (b) Omitted material information concerning VOCs in decaffeinated coffee products;
9. By reason of their actions and omissions, the Defendants induced consumers into purchasing their Coffee Products that do not live up to their reasonable environmental expectations, thereby causing the Plaintiff and the members of the Class to suffer economic damages, upon which they are entitled to claim;

B) The Defendants

10. Defendant Starbucks Coffee Canada, Inc. is a Canadian corporation with its head office in North York, Ontario, that conducts business throughout Canada, including within the province of Quebec, it is the registrant for the website www.starbucks.ca, the whole as appears more fully from a copy of an extract from the *Registraire des entreprises* and from a copy of the domain search results for the website www.starbucks.ca, produced herein *en liasse* as **Exhibit R-1**;
11. Defendant Starbucks Corporation, is an American Corporation with its head office in Seattle, Washington. It is the owner of *inter alia*, the following Canadian trade-marks:
 - Starbucks (TMA317613), which was filed on May 13, 1985,
 - Starbucks COFFEE (DESIGN) (TMA1029169), which was filed on June 19, 2016,
 - Starbucks Design (TMA874854), which was filed on November 7, 2012,

The whole as appears more fully from copies of said trade-marks from the CIPO database, produced herein *en liasse* as **Exhibit R-2**;

12. Starbucks Corporation, is a multinational coffee company that markets and sells packaged coffee products throughout Canada, including in Quebec;
13. Unless the context indicates otherwise, both Defendants will be referred to as Starbucks;
14. The Defendants are either directly or indirectly responsible for manufacturing, importing, exporting, distributing, marketing, advertising, promoting, packaging, labelling, selling, and/or representing their Coffee Products as ethically-sourced throughout Canada, including within the province of Quebec;

C) The Factual Situation

15. Canadian consumers have been becoming increasingly concerned about the environmental performance of products. Many are looking for products and services that are less harmful to the environment. This has led to an increased demand for “green” products or services, the whole as appears more fully from a copy of an extract from the Canadian Competition Bureau website at competition-bureau.canada.ca entitled “Environmental claims and greenwashing” dated December 2, 2021, produced herein as **Exhibit R-3**;
16. This demand has led to businesses communicating environmental benefits through “environmental labelling” and the use of advertising vehicles to promote these benefits. There are a wide range of descriptors, logos, vignettes, and other representations used to describe or imply environmental claims for consumer products. This means of communicating environmental claims is often called “green

marketing”, the whole as appears more fully from a copy of the Government of Canada’s “Environmental claims: A guide for industry and advertisers” dated June 25, 2008, produced herein as **Exhibit R-4**;

17. Any statement or symbol that refers to, or creates the general impression that it reflects, the environmental aspects of any product or service is considered an environmental claim. According to the Government of Canada, “The value of environmental claims rests on the assurance that the information provided is credible, objective, and easily identifiable and understood by consumers (Exhibit R-4);
18. Starbucks promotes its coffee products as ethically sourced and responsible
19. For many years, Starbucks has prominently displayed the statement “Committed to 100% Ethical Coffee Sourcing” on the packaging of its coffee products;
20. This statement appears on the front of the packaging where it is readily visible to consumers at the point of sale;
21. For many years, Starbucks has included the statement “Committed to 100% Ethical Coffee Sourcing” on the front labels of its Starbucks coffee products. By displaying this message, the company suggests to consumers that the coffee beans used in Starbucks-branded products are obtained from responsible and ethical sources, rather than being produced through practices involving serious labour rights violations;
22. Beginning around 2022, Starbucks redesigned its coffee packaging but retained the same statement while also adding the logo of its proprietary C.A.F.E. Practices program;
23. Starbucks describes its C.A.F.E. Practices program as the cornerstone of its ethical sourcing approach;
24. Starbucks represents that the C.A.F.E. Practices program establishes strict environmental and labour standards and includes verification and auditing of coffee farms and suppliers;
25. Starbucks also represents that the program enforces zero-tolerance criteria for severe abuses such as forced labour and child labour;
26. Starbucks further enhances the credibility of its ethical sourcing representations by referring to its partnership with the environmental organization Conservation International;
27. Through these representations, Starbucks conveys to reasonable consumers that its coffee supply chains are monitored through an effective and reliable system ensuring compliance with ethical labour standards;

28. The use of the term “100%” communicates to consumers that all coffee sold by Starbucks complies with these ethical standards;
29. Consumers rely on such representations when deciding whether to purchase coffee products;
30. Ethical sourcing claims have become an important factor influencing consumer purchasing decisions.
31. Consumers are generally willing to pay a higher price for products they believe are ethically produced;
32. Starbucks coffee products are typically sold at prices higher than many comparable coffee products;
33. Independent investigations conducted over the past decade have documented labour violations on farms linked to Starbucks’ coffee supply chain;
34. These investigations have reported conditions including forced labour indicators, child labour, unsafe working conditions, and wage violations.
35. Some of these violations were reported on farms that had been certified under Starbucks’ C.A.F.E. Practices program;
36. In certain instances, such violations were discovered shortly after certification occurred or while certification remained active;
37. In other instances, farms retained certification despite documented labour violations;
38. These reports have been published by journalists, advocacy groups, and other organizations;
39. Despite these reports, Starbucks has continued to market its products as “Committed to 100% Ethical Coffee Sourcing”;
40. The Respondent has not provided consumers with any qualification or clarification indicating that labour abuses may occur within its supply chain;
41. As a result, the overall impression conveyed to consumers remains that Starbucks coffee products are ethically sourced without significant labour abuses;
42. Independent laboratory testing has detected volatile organic compounds (“VOCs”) in certain Starbucks decaffeinated coffee beans;
43. These compounds include benzene, toluene, and methylene chloride;
44. These compounds are commonly associated with industrial solvent applications;

45. Consumers would not ordinarily expect such compounds to be present in coffee products;
46. Starbucks does not disclose the presence of these compounds on product packaging or at the point of sale;
47. The omission of this information constitutes a material omission likely to influence consumer purchasing decisions;
48. As a result of Starbucks' representations and omissions, the Applicant and Class Members purchased Starbucks coffee products that they might not otherwise have purchased or would have purchased at a lower price;
49. The Applicant therefore seeks authorization to institute a class action on behalf of Quebec consumers;

I. The Defendants' Coffee Products and their Representations

50. Starbucks uses a series of misleading representations to create the impression that its coffee is ethically sourced:
 - (a) The prominent statement "Committed to 100% Ethical Coffee Sourcing" is on all Starbucks Coffee Products,
 - (b) Persistent promotion of its C.A.F.E. Practices program as a system of rigorous labour and human-rights oversight, including verification, audits, and zero-tolerance for forced labour or child labour,
 - (c) Partnerships with third-party organizations, including Conservation International, to amplify credibility of ethical sourcing claims,
 - (d) Use of the term "100%" to convey that ethical violations are promptly investigated and remedied;
51. Despite these representations, investigations over the past decade show that:
 - (a) Labour abuses persist on C.A.F.E.-certified farms,
 - (b) Farms retained certification despite severe violations, government fines, or worker rescues,
 - (c) Starbucks has failed to provide consumers with updated or corrective information about remedial measures;

52. Testing of decaffeinated coffee products confirms the presence of VOCs¹, including benzene, toluene, and methylene chloride, which are industrial solvents not expected in food products and are undisclosed to consumers.

II. The U.S. Litigation

53. On January 13, 2026, a similar class action with filed in the United States District Court for the Western District of Washington alleging substantially similar claims against Starbucks Corporation (the “U.S. Litigation”), the whole as appears more fully from a copy of the Class Action Complaint in Case No. 2:26-cv-00112 dated January 13, 2026, produced herein as **Exhibit R-5**;

III. Summative Remarks

54. The Defendants engaged and continue to engage in a widespread, uniform marketing campaign using the Coffee Products’ packaging, their websites, and various advertisements to mislead consumers about the environmental benefits and environmental sustainability of their Coffee Products;

55. The Defendants’ ongoing practice of manufacturing, distributing, marketing, advertising, promoting, packaging, labelling, selling, and/or representing their Coffee Products as ethically-sourced – when in fact, they are produced using widespread deforestation practices – is likely to deceive ordinary consumers. In reliance upon the Defendants’ claims that their Coffee Products are produced in an ethically-sourced way, Class Members sought out and were willing to pay more for the Coffee Products than similar products that do not claim to be ethically-sourced, and in fact did purchase and use the Coffee Products;

56. The advertisements and representations made by the Defendants as set forth above were and are false and/or misleading. The acts and practices of the Defendants, as alleged herein, constitute unfair or deceptive acts or practices and the marking of false statements;

57. As a result of the Defendants’ deceptive claims, consumers have purchased products that are substantially different than represented;

58. The Plaintiff and the other Class Members were among the intended recipients of the Defendants’ deceptive representations and omissions described herein. The Defendants’ deceptive representations and omissions, as described herein, are material in that a reasonable person would attach importance to such information and would be induced to act upon such information in making purchase decisions;

¹ Volatile Organic Compounds.

59. Consumers were induced into purchasing the Defendants' Coffee Products through the use of false and misleading representations, thereby vitiating their consent and entitling them to claim a refund for the purchase price of those products;

II. FACTS GIVING RISE TO AN INDIVIDUAL ACTION BY THE PLAINTIFF

60. The Plaintiff has purchased and used many packages of the Defendants' Coffee Products over the years, from various stores in Quebec;

61. The Plaintiff believed and relied upon, from having seen the Defendants' marketing and having read the product labelling, that the Defendants' Coffee Products were an ethically-sourced product that was sourced using sustainable practices, this was a significant factor in her decision to purchase the products;

62. The Plaintiff has recently learned that the Defendants' environmental claims are false and that she purchased the products based on misleading information;

63. In consequence, the Plaintiff now realizes that she has been misled by the Defendants; had she known the true facts, the Plaintiff would not have purchased the Defendants' Coffee Products or would not have paid a premium;

64. The Plaintiff's damages are a direct and proximate result of the Defendants' conduct and its false and misleading advertising;

65. In consequence of the foregoing, the Plaintiff is justified in claiming damages in the amount of money spent purchasing the Defendants' Coffee Products;

III. FACTS GIVING RISE TO AN INDIVIDUAL ACTION BY EACH OF THE MEMBERS OF THE GROUP

66. Every member of the Class has purchased the Defendants' Coffee Products believing that they were supplied using ethically-sourced and sustainable practices due to Defendants' marketing, advertising, and labelling of these claims, namely:

- Marketing coffee products as "100% ethically sourced", and
- Failing to disclose the presence of VOCs in decaffeinated coffee products;

67. These representations and omissions affect all Class Members in the same manner and give rise to common issues of fact and law;

68. The Class Members were, therefore, induced into error by the Defendants' false and misleading advertising;

69. Had the Defendants disclosed the truth about their Coffee Products, reasonable consumers would not have purchased them and/or certainly would not have paid such a high price for them;

70. In consequence of the foregoing, each member of the Class is justified in claiming at least one or more of the following as damages:

- a. The purchase price of the Defendants' Coffee Products or in the alternative, a portion of the purchase price for the Defendants' Coffee Products;
- b. Punitive damages;

71. The Defendants engaged in wrongful conduct, while at the same time obtaining, under false pretences, significant sums of money from Class Members;

72. All of these damages to the Class Members are a direct and proximate result of the Defendants' conduct and their false and misleading advertising;

IV. CONDITIONS REQUIRED TO INSTITUTE A CLASS ACTION

73. The Applicant requests authorization to institute this class action as the criteria under Article 575 C.C.P. are met:

A) The composition of the Class makes it difficult or impracticable to apply the rules for mandates to sue on behalf of others or for consolidation of proceedings

74. The Plaintiff is not privy to the specific number of persons who purchased the Defendants' Coffee Products; however, it is safe to estimate that it is in the hundreds of thousands (if not millions). Nevertheless, the Defendants' sales records could establish the size of the class to a reasonable degree of exactitude. A class action is therefore the most efficient and appropriate procedure;

75. Class Members are numerous and are scattered across the entire province of Quebec and country;

76. In addition, given the costs and risks inherent in an action before the courts, many people will hesitate to institute an individual action against the Defendants. Even if the Class Members themselves could afford such individual litigation, it would place an unjustifiable burden on the courts and, at the very least, is not in the interests of judicial economy. Furthermore, individual litigation of the factual and legal issues raised by the conduct of the Defendants would increase delay and expense to all parties and to the court system;

77. While certain Class Members may have suffered a substantial loss, it is expected that the majority have suffered small losses making it economically unfeasible to finance the litigation expenses inherent in any legal proceeding;

78. This class action overcomes the dilemma inherent in an individual action whereby the legal fees alone would deter recovery and thereby in empowering the consumer, it realizes both individual and social justice as well as rectifies the imbalance and restore the parties to parity;

79. Also, a multitude of actions instituted in different jurisdictions, both territorial (different provinces) and judicial districts (same province), risks having contradictory judgments on questions of fact and law that are similar or related to all members of the Class;
80. These facts demonstrate that it would be impractical, if not impossible, to contact each and every member of the Class to obtain mandates and to join them together in one action;
81. In these circumstances, a class action is the only appropriate procedure and the only viable means for all of the members of the Class to effectively pursue their respective rights and have access to justice;

B) The claims of the members of the Class raise identical, similar or related issues of law or fact

82. All consumers were subjected to the same deceptive actions – the marketing, advertising, promoting, packaging, labelling, selling, and/or representing of the Defendants' Coffee Products;
83. Individual issues, if any, pale by comparison to the common issues that are significant to the outcome of the litigation;
84. The damages sustained by the Class Members flow, in each instance, from a common nucleus of operative facts, namely, the Defendants' misconduct;
85. The claims of the members raise identical, similar or related issues of fact or law, namely:
- a) Did the Defendants engage in unfair, false, misleading, or deceptive acts or practices regarding the manufacturing, importing, exporting, distributing, marketing, advertising, promoting, packaging, labelling, selling, and/or representing their Coffee Products?
 - b) Did the Defendants represent to consumers that its coffee products were "Committed to 100% Ethical Coffee Sourcing"?
 - c) Did the Defendants fail to adequately disclose material facts relating to labour violations within its coffee supply chain?
 - d) Do Starbucks decaffeinated coffee products contain volatile organic compounds, including benzene, toluene, or methylene chloride?
 - e) Are the Defendants liable to the Class Members for reimbursement of the purchase price of their Coffee Products as a result of their misconduct?
 - f) Should an injunctive remedy be ordered to prevent the Defendants from continuing to perpetrate their unfair, false, misleading, and/or deceptive conduct

– more specifically, to cease representing their Coffee Products as being ethically-sourced?

g) Are the Defendants responsible to pay punitive damages to Class Members and in what amount?

86. The interests of justice favour that this application be granted in accordance with its conclusions;

V. NATURE OF THE ACTION AND CONCLUSIONS SOUGHT

87. The action that the Plaintiff wishes to institute on behalf of the members of the Class is an action in damages, injunctive relief, and a declaratory judgment;

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

GRANT the class action of the Plaintiff and each of the members of the Class;

DECLARE that the Defendants have committed unfair, false, misleading, and/or deceptive conduct with respect to their manufacturing, importing, exporting, distributing, marketing, advertising, promoting, packaging, labelling, selling, and/or representation of their Coffee Products throughout Canada;

ORDER the Defendants to cease from continuing their unfair, false, misleading, and/or deceptive conduct by manufacturing, importing, exporting, distributing, marketing, advertising, promoting, packaging, labelling, selling, and/or representation of their Coffee Products;

ORDER the Defendants to disclose the presence of volatile organic compounds (VOCs) in its decaffeinated coffee products;

ISSUING injunctive relief preventing Starbucks from continuing to market its coffee products as “100% ethically sourced” until such time as such statements are truthful and adequately qualified;

CONDEMN the Defendants to pay to each member of the Class a sum to be determined in compensation of the damages suffered, and ORDER collective recovery of these sums;

CONDEMN the Defendants to pay punitive damages to each of the members of the Class, and ORDER collective recovery of these sums;

CONDEMN the Defendants to pay interest and additional indemnity on the above sums according to law from the date of service of the application to authorize a class action;

ORDER the Defendants to deposit in the office of this Court the totality of the sums which forms part of the collective recovery, with interest and costs;

CONDEMN the Defendants to bear the costs of the present action including expert and notice fees;

RENDER any other order that this Honourable Court shall determine and that is in the interest of the members of the Class;

A) The Plaintiff requests that she be designated as representative of the Class

89. The Plaintiff is a member of the Class;

90. The Plaintiff is ready and available to manage and direct the present action in the interest of the members of the Class that she wishes to represent and is determined to lead the present dossier until a final resolution of the matter, the whole for the benefit of the Class, as well as, to dedicate the time necessary for the present action before the Courts and the *Fonds d'aide aux actions collectives*, as the case may be, and to collaborate with her attorneys;

91. The Plaintiff has the capacity and interest to fairly, properly, and adequately protect and represent the interest of the members of the Class;

92. The Plaintiff has given the mandate to her attorneys to obtain all relevant information with respect to the present action and intends to keep informed of all developments;

93. The Plaintiff, with the assistance of her attorneys, is ready and available to dedicate the time necessary for this action and to collaborate with other members of the Class and to keep them informed;

94. The Plaintiff has given instructions to her attorneys to put information about this class action on their website and to collect the coordinates of those Class Members that wish to be kept informed and participate in any resolution of the present matter, the whole as will be shown at the hearing;

95. The Plaintiff is in good faith and has instituted this action for the sole goal of having her rights, as well as the rights of other Class Members, recognized and protected so that they may be compensated for the damages that they have suffered as a consequence of the Defendants' conduct;

96. The Plaintiff understands the nature of the action;

97. The Plaintiff's interests do not conflict with the interests of other Class Members and further, the Plaintiff has no interest that is antagonistic to those of other members of the Class;

98. The Plaintiff is prepared to be examined out-of-court on her allegations (as may be authorized by the Court) and to be present for Court hearings, as may be required and necessary;

99. The Plaintiff has spent time researching this issue on the internet and meeting with her attorneys to prepare this file. In so doing, she is convinced that the problem is widespread;

B) The Plaintiff suggests that this class action be exercised before the Superior Court of Justice in the district of Montreal

100. A great number of the members of the Class reside in the judicial district of Montreal and in the appeal district of Montreal;

101. The Plaintiff's attorneys practice their profession in the judicial district of Montreal;

102. The present application is well founded in fact and in law.

FOR THESE REASONS, MAY IT PLEASE THE COURT:

GRANT the present application for authorization to institute the class action against the Defendants;

AUTHORIZE the bringing of a class action in the form of an application to institute proceedings in damages, injunctive relief, and declaratory relief;

APPOINT the Plaintiff as representative of the persons included in the Class herein described as:

- All persons residing in Quebec who purchased Starbucks-branded coffee products (the "Coffee Products") or any other group to be determined by the Court;

IDENTIFY the principal issues of fact and law to be treated collectively as the following:

- a) Did the Defendants engage in unfair, false, misleading, or deceptive acts or practices regarding the manufacturing, importing, exporting, distributing, marketing, advertising, promoting, packaging, labelling, selling, and/or representing their Coffee Products?
- b) Did the Defendants represent to consumers that its coffee products were "Committed to 100% Ethical Coffee Sourcing"?
- c) Did the Defendants fail to adequately disclose material facts relating to labour violations within its coffee supply chain?

- d) Do Starbucks decaffeinated coffee products contain volatile organic compounds, including benzene, toluene, or methylene chloride?
- e) Are the Defendants liable to the Class Members for reimbursement of the purchase price of their Coffee Products as a result of their misconduct?
- f) Should an injunctive remedy be ordered to prevent the Defendants from continuing to perpetrate their unfair, false, misleading, and/or deceptive conduct – more specifically, to cease representing their Coffee Products as being ethically-sourced?
- g) Are the Defendants responsible to pay punitive damages to Class Members and in what amount?

IDENTIFY the conclusions sought by the class action to be instituted as being the following:

GRANT the class action of the Plaintiff and each of the members of the Class;

DECLARE that the Defendants have committed unfair, false, misleading, and/or deceptive conduct with respect to their manufacturing, importing, exporting, distributing, marketing, advertising, promoting, packaging, labelling, selling, and/or representation of their Coffee Products throughout Canada;

ORDER the Defendants to cease from continuing their unfair, false, misleading, and/or deceptive conduct by manufacturing, importing, exporting, distributing, marketing, advertising, promoting, packaging, labelling, selling, and/or representation of their Coffee Products;

ORDER the Defendants to disclose the presence of volatile organic compounds (VOCs) in its decaffeinated coffee products;

ISSUING injunctive relief preventing Starbucks from continuing to market its coffee products as “100% ethically sourced” until such time as such statements are truthful and adequately qualified;

CONDEMN the Defendants to pay to each member of the Class a sum to be determined in compensation of the damages suffered, and ORDER collective recovery of these sums;

CONDEMN the Defendants to pay punitive damages to each of the members of the Class, and ORDER collective recovery of these sums;

CONDEMN the Defendants to pay interest and additional indemnity on the above sums according to law from the date of service of the application to authorize a class action;

ORDER the Defendants to deposit in the office of this Court the totality of the sums which forms part of the collective recovery, with interest and costs;

CONDEMN the Defendants to bear the costs of the present action including expert and notice fees;

RENDER any other order that this Honourable Court shall determine and that is in the interest of the members of the Class;

DECLARE that all members of the Class that have not requested their exclusion, be bound by any judgment to be rendered on the class action to be instituted in the manner provided for by the law;

FIX the delay of exclusion at thirty (30) days from the date of the publication of the notice to the Class Members, date upon which the members of the Class that have not exercised their means of exclusion will be bound by any judgment to be rendered herein;

ORDER the publication of a notice to the members of the group in accordance with article 579 C.C.P. within sixty (60) days from the judgment to be rendered herein in LA PRESSE, THE GLOBE AND MAIL, and THE GAZETTE;

ORDER that said notice be available on the Defendants' websites, as well as its Facebook page(s) and Twitter account(s) with a link stating "Notice to Starbucks Coffee Purchasers";

RENDER any other order that this Honourable Court shall determine and that is in the interest of the members of the Class;

THE WHOLE with costs, including all publication and dissemination fees.

Montreal, March 9, 2026



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