

CANADA
PROVINCE OF QUEBEC
DISTRICT OF MONTREAL

No: 500-17-134926-255

**SUPERIOR COURT
(CIVIL DIVISION)**

DAHLIA KURTZ, electing domicile for the purposes of the presents at the offices of her attorneys, situated at 1255 Peel Street, Suite 1000, in the city of Montreal, district of Montreal, province of Quebec, H3B 2T9;

Plaintiff

-v-

YVES ENGLER, domiciled and residing at 1858 Atataken, in the city of Montréal, province of Québec, H2L 3L7;

-and-

ROGER WATERS, residing at 2 Canal Reach, in the city of London, in the United Kingdom, N1C 4DB;

Defendants

**ORIGINATING APPLICATION FOR COMPENSATORY
AND PUNITIVE DAMAGES FOR DEFAMATION**
(Art. 100 C.C.P., Art. 3, 6, 7, 1457 C.c.Q.,
Arts. 4 & 49 of the *Charter of Human Rights and Freedoms*)

**TO ONE OF THE HONOURABLE JUDGES OF THE SUPERIOR COURT, SITTING
FOR THE DISTRICT OF MONTRÉAL, PLAINTIFF RESPECTFULLY SUBMITS AS
FOLLOWS:**

I. THE PRESENT ACTION

1. Plaintiff¹ is seeking a solidary condemnation against the Defendants herein for pecuniary, moral, and punitive damages due to false, defamatory, malicious and reckless allegations which were published and broadcast publicly by the Defendants, as is more fully described herein below;

¹ Given the conduct of Defendant Engler and his continuous attempts to inspire and promote hate towards the Plaintiff, her personal home address is not being provided. Upon demand by Defendants and subject to a confidentiality agreement or Court Order, her address will be provided.

II. THE PARTIES

2. Plaintiff Dahlia Kurtz (hereinafter “**Kurtz**” or “**Plaintiff**”) is a social media influencer who has had a constant presence in Canadian media since 2011;
3. Kurtz began her career as a news reporter and producer with CBC in or around 2003, and went on to become a nationally syndicated writer. In 2013, she became a radio talk show host at CJOB in Winnipeg. Thereafter, she was involved in various radio shows throughout Canada, namely CJAD in Montreal, CFRA in Ottawa, and eventually became the national morning radio show host for SiriusXM;
4. Kurtz is also known for her podcast, which has reached over forty million people as of the date of the present proceedings, and for her occasional contributions to newspapers, such as the *National Post*;
5. Kurtz has an important social media presence which forms an integral part of her brand and is mainly active on X (formerly known as Twitter). Kurtz’s publications on X typically reach around one million (1,000,000) people per day, and have reached up to thirty-four million (34,000,000) people per day;
6. Defendant Yves Engler (hereinafter “**Engler**”) is also a public figure and writer who occasionally publishes columns in Canadian newspapers and online. As of the date of the present proceedings, Engler had:
 - a. over forty thousand (40,000) followers on X;
 - b. over fourteen thousand (14,000) followers on Instagram;
 - c. three thousand nine hundred seventy-four(3,974) followers and five thousand (5,000) friends on Facebook;
 - d. over one thousand four hundred (1,400) followers on Youtube; and
 - e. over 70,000 followers on Tiktok;

the whole as more fully appears from copies of Engler’s profiles on X, Instagram, Facebook, Youtube, and Tiktok, communicated herewith *en liasse* as **Exhibit P-1**;
7. Kurtz and Engler have never met, nor have Kurtz and Defendant Roger Waters (“**Waters**”);
8. Waters is an internationally known musician and singer-songwriter who co-founded the rock band Pink Floyd. As of the date of the present proceedings, Waters had over one million four hundred thousand (1,400,000) followers on Instagram, two million seven hundred (2,700,000) followers on Facebook, and six hundred thousand (600,000) followers on X, the whole as more fully appears from copies of

Waters' Instagram, Facebook, Youtube and X profiles, communicated herewith, *en liasse*, as **Exhibit P-2**;

9. It should be noted that on February 25, 2025, Defendant Waters was held liable for defaming John Ware, the High Court of Justice King's Bench Division rendered judgment in journalist / broadcaster John Ware's favour following a trial of preliminary issues in the defamation claim brought by John Ware against Waters and Al Jazeera Media Network, the whole as more fully appears from copy of the High Court of Justice King's Bench Division judgment, bearing case number KB 2024 002122, communicated herewith as **Exhibit P-3**;

III. THE CONTEXT

10. As of the date of the present proceedings, Plaintiff has been and continues to be the subject of multiple instances of defamatory publications by Defendant Engler over a period of several months. Far from relenting, Defendant Engler has openly asserted as recently as July 20, 2025, that he feels emboldened to continue his faulty conduct, as shall be exposed herein below;
11. On March 9, 2024, Kurtz made a publication on X in which she shared a video of protesters chanting "*there is only one solution*";
12. Kurtz shared this video with her followers with the following caption: "*Holocaust. They are calling for another Holocaust. Hey Canada, at what point is enough enough?*", the whole as more fully appears from copy of Kurtz's X publication dated March 9, 2024, communicated herewith as **Exhibit P-4**;
13. On March 10, 2024, Engler began systematically replying to Plaintiff's publication and posting his own publications on *inter alia* X, Instagram and Facebook, calling her, *inter alia*, a "**sick genocidal maniac**", a "**fascist thug**", a "**Jewish Supremacist**", and a "**racist genocide promoter**", and many more vicious insults, the whole as more fully appears from copies of Engler's social media publications and an article against Plaintiff from March 2024 through December 2024, communicated herewith, *en liasse*, as **Exhibit P-5**;
14. On July 5, 2024, Plaintiff addressed a publication on X to Engler, advising him that he was making her fear for her safety and demanding that he stop harassing her immediately, the whole as more fully appears from copy of Kurtz's X publication dated July 5, 2024, communicated herewith as **Exhibit P-6**;
15. Engler ignored and/or failed to conform to Kurtz's plea for him to cease his vexatious online behavior and instead responded by falsely accusing her yet again of supporting "**a holocaust**", following which Engler embarked on what can only be described as a defamation campaign against Plaintiff;

IV. THE ONGOING DEFAMATORY ALLEGATIONS

16. On December 29, 2024, Engler published an article directly concerning Plaintiff on his personal blog, which was subsequently published in the *Palestine Chronicle* on December 30, 2024. In this article, Engler claimed that Kurtz had become “**a leader in Canada’s fascist movement**” and called her a “**compulsive liar**”, the whole as more fully appears from copy of Engler’s blog post-dated December 29, 2024, and of the *Palestine Chronicle* article dated December 30, 2024, communicated herewith, *en liasse*, as **Exhibit P-7**;
17. On February 18, 2025, Engler was requested by the SPVM to present himself at a police station where he would be charged for harassment against Kurtz². Engler immediately took to social media to publish yet another defamatory message against Plaintiff, falsely accusing her of being “**racist**”, “**violent**”, a “**genocide supporter**”, a “**compulsive liar**”, and a “**leader in Canada’s fascists movement**”, the whole as more fully appears from copy of Engler’s X publication dated February 18, 2025, communicated herewith as **Exhibit P-8**;
18. Said publication (Exhibit P-8) included a picture of Plaintiff, who is easily recognizable due to her distinctive, curly blond hair;
19. Engler’s defamatory post published on February 18, 2025, had been viewed by more than seven hundred thousand (700,000) people as at the date of institution of the present proceedings;
20. On February 22, 2025, Defendant Waters published a video on Instagram, Facebook, X, and Youtube, in which he (a) amplified Engler’s vindictive, vexatious and defamatory attacks against Kurtz and (b) asserted that Plaintiff was a “**sick puppet in support of genocide**” and that she “**should be locked up in a looney bin**”, the whole as more fully appears from copy of a video dated February 22, 2025, and proof of publication on various platforms, communicated herewith, *en liasse*, as **Exhibit P-9**;
21. On February 26, 2025, Plaintiff, through her attorney, transmitted a demand letter to Defendant Waters, the whole as more fully appears from copy of said demand letter, communicated herewith as **Exhibit P-10**;
22. The demand letter (Exhibit P-10) remains unanswered and no retraction was provided by Defendant Waters;
23. As of the date of the present proceedings, Waters’ February 22, 2025, video (Exhibit P-9) was viewed by approximately two hundred twenty-six thousand (226,000) people on Instagram, seventy thousand (70,000) people on Facebook, two hundred

² The charges were eventually withdrawn but Plaintiff understands that criminal proceedings can be re-instituted by the Crown within twelve (12) months pursuant to section 579 of the *Criminal Code*.

thirty-seven thousand (237,000) people on X and thirteen thousand three hundred (13,300.00) people on Youtube, the whole as more full appears from copies of screen captures of the number of views of the video on each platform, communicated herewith, *en liasse*, as **Exhibit P-11**;

24. On or about February 24, 2025, upon his release, Defendant Yves Engler was publicly greeted by a group of supporters. During this gathering, the group began chanting the phrase “***fuck you Dahlia***,” in reference to Plaintiff. Said chant was repeated in a hostile and aggressive manner, in a public setting, and was recorded and shared on social media, the whole as more fully appears from copy of a video published on X of a mob chanting “fuck you Dahlia”, communicated herewith as **Exhibit P-12**;
25. On March 12, 2025, Engler posted an article to his blog titled “***Reflections on my arrest and lessons learned***” in which he called Kurtz “***a woman happy to play Jewish victim***”, the whole as more fully appears from copy of Engler’s March 12, 2025, blog post titled “***Reflections on my arrest and lessons learned***”, communicated herewith as **Exhibit P-13**;
26. In the same article on his blog (Exhibit P-13), Engler referred to Kurtz as a “***front for a vast Zionist lawfare initiative***” and an “***extreme Jewish supremacist activist***”;
27. From on or about May 29, 2025, to on or about June 11, 2025, Defendant Engler shared his blog post titled “***Zionist’s use of legal system to attack critics fails again***”, in which he referred to Kurtz’s “***genocidal Jewish supremacism***” and “***violent, racist social media posts***”, to numerous Facebook groups, with exponential and currently unknown reach, the whole as more fully appears from copies of Facebook posts in numerous groups made by Engler between May 29, 2025, and June 11, 2025, communicated herewith, *en liasse*, as **Exhibit P-14**;
28. On June 27, 2025, in article on his blog titled “***SuperJew seller cheers York medic firing for Israel post***”, Engler referred to Kurtz as an “***aggressive Jewish supremacist who seeks to monetize her authoritarian genocidal activism***”, the whole as more fully appears from copy of Engler’s June 27, 2025, blog post titled “***SuperJew seller cheers York medic firing for Israel post***”, communicated herewith as **Exhibit P-15**;
29. In the same article on his blog (Exhibit P-15), Engler also referred to Kurtz as an “***unhinged fanatic***” and an “***unhinged genocidal fanatic***”;
30. On July 20, 2025, Defendant Engler posted an article from his website on X, in which he commented in relation to the allegations made at paragraph 17 herein above (regarding the charges stemming from the SPVM investigation into his conduct towards Plaintiff), and wrote, *inter alia*, as follows:

“Dalia [sic] Kurtz has been taking loss after loss [...]

*Interestingly, my continued writing about Kurtz’s **violent racism** likely influenced the prosecution’s decision to drop the charges. In “I can hardly wait for unhinged Zionist fanatic to testify”, “‘SuperJew’ seller cheers York medic firing for Israel post”, “Zionist’s use of legal system to attack critics fails again” and other articles I documented **Kurtz’ authoritarian, genocidal, positions**. [...]*

*If I would have accepted the conditions imposed on me, it wouldn’t have been possible to expose **Kurtz’ racism**.*

[...] While the prosecution dropped the charges against me related to Kurtz, they have retained four charges alleging I harassed police officers and disrupted their work by encouraging supporters to email the Montreal police regarding the charges against Kurtz.

*[...] In fact, **I’ve been emboldened by the duel with Dalia [sic] Kurtz**. It’s essential to stand up to these **cheerleaders for genocide** and the best way to do that is to demonstrate resilience in the face of their harassment. Even better, **to have fun doing it**.”*

the whole as more fully appears from copy of Engler’s X post on July 20, 2025, at 4:58 PM and of the corresponding post to Engler’s blog of the same date titled “[a]bsurd (dropped) charges exposed **racist, authoritarian Zionism**”, communicated herewith, *en liasse*, as **Exhibit P-16**;

31. As appears from Engler’s blog post (Exhibit P-16), Engler included a link therein for readers to donate to him to “support” his ongoing harassment and defamation campaign against Kurtz;
32. Copies of Engler’s social media publications and articles as of the date of the present proceedings concerning Plaintiff are communicated herewith, *en liasse*, as **Exhibit P-17**;
33. The allegations made about Plaintiff by Defendants in their respective publications are categorically and unequivocally false, libelous and defamatory, as well as extremely prejudicial to her reputation;
34. Defendants’ allegations to the effect that Kurtz is racist, violent, genocidal, a maniac, a compulsive liar, a fascist, and/or someone who “*belongs in a looney bin*”, are completely unfounded and deeply offensive;

35. Defendants published these reckless and defamatory allegations intentionally, in full knowledge of the fact that the allegations contained therein were false and had no basis whatsoever, and in doing so caused serious harm to Plaintiff's reputation;
36. From March 10th, 2024 until the date of the presents, Engler made approximately one hundred and three (103) publications about Plaintiff on various social media platforms and his website, which were viewed approximately one million eight hundred forty-three thousand seven hundred sixty-four (1,843,764) times in total;
37. Defendant Engler's defamatory rhetoric has exponentially cascaded, having been shared, reposted and echoed by numerous users on numerous platforms, the whole as more fully appears from copies of screenshots of social media posts by other users disseminating and/or echoing Engler's defamation campaign against Kurtz, communicated herewith, *en liasse*, as **Exhibit P-18**;

V. DAMAGE TO PLAINTIFF'S REPUTATION AND MORAL DAMAGES

38. Since the month of April 2024, namely shortly after the beginning of Engler's defamatory publications concerning Plaintiff, Kurtz became the subject of increasingly numerous calls to end her own life as well as threats to her life and personal safety, that of her loved ones, threats of rape and calls for violence against her, the whole as more fully appears from copies of threatening messages, communicated, *en liasse*, as **Exhibit P-19**;
39. Strangers begun threatening Kurtz both online and in person. On two occasions, strangers harassed Plaintiff in her very own condo building, screaming at her and accusing her of being a "**Nazi**";
40. As appears from Exhibit P-19, several individuals have told Plaintiff that she and her family would be hunted down in the streets;
41. The content of the insults that these strangers directed at Plaintiff make it clear that they were motivated by the falsehoods propagated by Defendants;
42. As appears from one email sent to Plaintiff by an individual going by the name of "P.L. Cozzi Tinin" (Exhibit P-19), said individual asserted to Kurtz that she deserves "*nothing less than the gas chamber*", that he hopes "*someone will brutally rape [Kurtz] and then slowly and painfully kill [her]*", that "*[she] and [her] whole family are candidates for 'die Entlösung' "*" (i.e. the final solution), and that "*lower animals like [her] sort do not deserve to live*". The same individual referred to Kurtz as a "*jüdische Hure*", in reference to Jewish concentration camp inmates who were forced into brothels during the Holocaust;

43. Other threats included statements such as “*the bullet is ready for you and your family, keep save [sic]*”, “*I’m not afraid to stab a woman in the neck if she’s a Zionist*”, “*London, and it’s your face slashed*”, “*hope you get raped you whore*”, “*I’ll d3stroy [sic] her throat with a stick – You will not survive the upcoming hollocost [sic]*”, “*YOU WILL DIE IN THE NEXT HOURS [...] DAHLIA CUNT, YOUR HEAD MAKES OF [sic] A NICE TARGET WHICH WE WILL HIT FROM FAR AWAY*”, “*[g]et cancer*”, “*[o]ven is waiting for you*”, and many more, as appears from Exhibit P-19;
44. Plaintiff noticed a significant increase in the amount and intensity of the threats she had been receiving since February 2025;
45. Plaintiff now often wears hoodies and sunglasses when she leaves the house in an attempt to conceal her identity and protect herself from would-be attackers;
46. The constant threats and harassment that Plaintiff has experienced due to Defendants’ actions have caused her an extreme amount of stress, embarrassment, and hardship, and have had a profound negative impact upon her personal and professional life, as shall be established at trial;
47. The scope of Plaintiff’s notoriety is across Canada, including in Quebec, and Plaintiff has thus suffered damages in Quebec;
48. At the date of the present proceedings, Plaintiff evaluates the moral damages suffered as a result of the violation of and interference with Plaintiff’s civil rights and freedoms recognized by the *Québec Civil Code* and *Charter of Human Rights and Freedom*, more particularly her security, dignity, honor, reputation and private life at one hundred fifty dollars (\$150,000.00), plus interest and the additional indemnity in virtue of section 1619 of the *Civil Code of Quebec*;

VI. PUNITIVE DAMAGES

49. In view of Defendants’ unlawful and clearly intentional attacks upon Plaintiff’s right to the safeguard of her dignity, honour and reputation, whereby Defendants deliberately persisted in making false and frivolous allegations against Kurtz notwithstanding that they knew or should have known that the facts upon which they were alleging and publishing were categorically false and had no basis in fact, Plaintiff is well founded in fact and at law to claim punitive damages from Defendants separately in accordance with section 49 of the *Charter of Human Rights and Freedoms*;
50. Plaintiff is thus at right to request that this Honourable Court condemn Defendants to pay punitive damages to compensate Plaintiff for the intentional violation of and interference with her civil rights and freedom recognized by the *Charter of Human Rights and Freedoms* (S.Q. 1975, c.6; R.S.Q., c. C-12), more particularly her security, dignity, honor, reputation and private life, in the amount of seventy-five

thousand dollars (\$75,000.00) each, plus interest and the additional indemnity in virtue of section 1619 of the *Civil Code of Quebec*;

51. The present *Originating Application for Compensatory and Punitive Damages for Defamation* is well founded in fact and at law;

FOR THESE REASONS, PLAINTIFF PETITIONS THIS HONOURABLE COURT TO:

GRANT the present *Originating Application for Compensatory and Punitive Damages for Defamation*;

CONDEMN Defendants severally to pay to Plaintiff the sum of **One Hundred Fifty Thousand Dollars (\$150,000.00)**, representing an indemnity for the moral damages suffered by Plaintiff, plus interest and the additional indemnity in virtue of section 1619 of the *Civil Code of Quebec*;

DECLARE that Defendant Yves Engler has violated Plaintiff Dahlia Kurtz's right to her dignity, honour and reputation, in violation of section 4 of the *Charter of Human Rights and Freedoms*;

DECLARE that Defendant Yves Engler's violation of Plaintiff Dahlia Kurtz's rights according to section 4 of the *Charter of Human Rights and Freedoms* was intentional, in violation of section 49 of the *Charter of Human Rights and Freedoms*;

CONDEMN Defendant Yves Engler to pay to Plaintiff Dahlia Kurtz the sum of **Seventy-Five Thousand Dollars (\$75,000.00)** in punitive damages, plus interest and the additional indemnity in virtue of section 1619 of the *Civil Code of Quebec*;

DECLARE that Defendant Roger Waters has violated Plaintiff Dahlia Kurtz's right to her dignity, honour and reputation, in violation of section 4 of the *Charter of Human Rights and Freedoms*;

DECLARE that Defendant Roger Waters' violation of Plaintiff Dahlia Kurtz's rights according to section 4 of the *Charter of Human Rights and Freedoms* was intentional, in violation of section 49 of the *Charter of Human Rights and Freedoms*;

CONDEMN Defendant Roger Waters to pay to Plaintiff Dahlia Kurtz the sum of **Seventy-Five Thousand Dollars (\$75,000.00)** in punitive damages, plus interest and the additional indemnity in virtue of section 1619 of the *Civil Code of Quebec*;

THE WHOLE with legal costs against Defendants;

Montreal, July 24, 2025

SPIEGEL RYAN LLP

Spiegel Ryan LLP

Me Neil G. Oberman., LL.M.

1255 Peel Street, suite 1000

Montréal (Québec) H3B 2T9

Tel.: 514-875-2100 / Fax: 514-875-8237

Email: noberman@spiegelsohmer.com

Attorneys for Plaintiff

Our ref.: 256858-002

SUMMONS
(articles 145 and following C.C.P.)

Filing of a judicial application

Take notice that the plaintiff has filed this originating application in the office of the Superior Court of Quebec in the judicial district of Montreal.

Defendant's answer

You must answer the application in writing, personally or through a lawyer, at the courthouse of Montreal situated at 1, Notre-Dame East, Montreal, Quebec H2Y 1B6, within 15 days of service of the application or, if you have no domicile, residence or establishment in Québec, within 30 days. The answer must be notified to the plaintiff's lawyer or, if the plaintiff is not represented, to the plaintiff.

Failure to answer

If you fail to answer within the time limit of 15 or 30 days, as applicable, a default judgement may be rendered against you without further notice and you may, according to the circumstances, be required to pay the legal costs.

Content of answer

In your answer, you must state your intention to:

- negotiate a settlement;
- propose mediation to resolve the dispute;
- defend the application and, in the cases required by the Code, cooperate with the plaintiff in preparing the case protocol that is to govern the conduct of the proceeding. The protocol must be filed with the court office in the district specified above within 45 days after service of this summons. However, in family matters or if you have no domicile, residence or establishment in Québec, it must be filed within 3 months after service; or
- propose a settlement conference.

The answer to the summons must include your contact information and, if you are represented by a lawyer, the lawyer's name and contact information.

Where to file the judicial application

Unless otherwise provided, the judicial application is heard in the judicial district where your domicile is located, or failing that, where your residence or the domicile you elected or agreed to with plaintiff is located. If it was not filed in the district where it can be heard and you want it to be transferred there, you may file an application to that effect with the court.

However, if the application pertains to an employment, consumer or insurance contract or to the exercise of a hypothecary right on the immovable serving as your main residence, it is heard in the district where the employee's, consumer's or insured's domicile or residence is located, whether that person is the plaintiff or the defendant, in the district where the immovable is located or, in the case of property insurance, in the district where the loss occurred. If it was not filed in the district where it can be heard and you want it to be transferred there, you may file an application to that effect with the special clerk of that district and no contrary agreement may be urged against you.

Transfer of application to the Small Claims Division

If you qualify to act as a plaintiff under the rules governing the recovery of small claims, you may contact the clerk of the court to request that the application be processed according to those rules. If you make this request, the plaintiff's legal costs will not exceed those prescribed for the recovery of small claims.

Convening a case management conference

Within 20 days after the case protocol mentioned above is filed, the court may call you to a case management conference to ensure the orderly progress of the proceeding. Failing that, the protocol is presumed to be accepted.

Exhibits supporting the application

In support of the originating application, the plaintiff intends to use the following exhibits:

- Exhibit P-1:** Copies of Defendant Engler's profiles on X, Instagram, Facebook, Youtube, and Tiktok, *en liasse*;
- Exhibit P-2:** Copies of Defendant Waters' Instagram, Facebook, Youtube and X profiles, *en liasse*;
- Exhibit P-3:** Copy of the High Court of Justice King's Bench Division judgment, bearing case number KB 2024 002122;
- Exhibit P-4:** Copy of Plaintiff's X publication dated March 9, 2024;
- Exhibit P-5:** Copies of Defendant Engler's social media publications and an article against Plaintiff from March 2024 through December 2024, *en liasse*;
- Exhibit P-6:** Copy of Plaintiff's X publication dated July 5, 2024;
- Exhibit P-7:** Copies of Defendant Engler's blog post-dated December 29, 2024, and of the Palestine Chronicle article dated December 30, 2024, *en liasse*;

- Exhibit P-8:** Copy of Defendant Engler’s X publication dated February 18, 2025;
- Exhibit P-9:** Copy of a video dated February 22, 2025, and proof of publication on various platforms, *en liasse*;
- Exhibit P-10:** Copy of a demand letter transmitted to Defendant Waters on February 26, 2024;
- Exhibit P-11:** Copies of screen captures of the number of views of Defendant Waters’ video on each platform, *en liasse*;
- Exhibit P-12:** Copy of a video published on X of a mob chanting “fuck you Dahlia”;
- Exhibit P-13:** Copy of Defendant Engler’s March 12, 2025, blog post titled “*Reflections on my arrest and lessons learned*”;
- Exhibit P-14:** Copies of Facebook posts in numerous groups made by Defendant Engler between May 29, 2025, and June 11, 2025, *en liasse*;
- Exhibit P-15:** Copy of Defendant Engler’s June 27, 2025, blog post titled “SuperJew seller cheers York medic firing for Israel post”;
- Exhibit P-16:** Copy of Defendant Engler’s X post on July 20, 2025, at 4:58 PM and of the corresponding post to Defendant Engler’s blog of the same date titled “*[a]bsurd (dropped) charges exposed racist, authoritarian Zionism*”;
- Exhibit P-17:** Copies of Engler’s social media publications and articles as of the date of the present proceedings concerning Plaintiff, *en liasse*;
- Exhibit P-18:** Copies of screenshots of social media posts by other users disseminating and/or echoing Defendant Engler’s defamation campaign against Plaintiff;
- Exhibit P-19:** Copies of threatening messages, *en liasse*;

The Exhibits are available upon request.

Notice of presentation of an application

Applications filed in the course of a proceeding and applications under Book III or V of the Code—but excluding applications pertaining to family matters under article 409 and applications pertaining to securities under article 480—as well as certain applications under Book VI of the Code, including applications for judicial review, must be accompanied by a notice of presentation, not by a summons. In such circumstances, the establishment of a case protocol is not required.

LIST OF EXHIBITS

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- Exhibit P-19:** Copies of threatening messages, *en liasse*;

Montreal, July 24, 2025

SPIEGEL RYAN LLP

Spiegel Ryan LLP

Me Neil G. Oberman., LL.M.

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Attorneys for Plaintiff

Our ref.: 256858-002

NO : 500-17-134926-255

**SUPERIOR COURT
PROVINCE OF QUÉBEC
DISTRICT OF MONTREAL**

DAHLIA KURTZ, 1255 Peel Street, Suite 1000, in the city of Montreal, district of Montreal, province of Quebec, H3B 2T9;

Plaintiff

-v-

YVES ENGLER, 1858 Atataken, in the city of Montréal, province of Québec, H2L 3L7;

-and-

ROGER WATERS, 2 Canal Reach, in the city of London, in the United Kingdom, N1C 4DB;

Defendants

**ORIGINATING APPLICATION FOR COMPENSATORY
AND PUNITIVE DAMAGES FOR DEFAMATION**
(Art. 100 *C.C.P.*, Art. 3, 6, 7, 1457 *C.c.Q.*,
Arts. 4 & 49 of the *Charter of Human Rights and
Freedoms*), **LIST OF EXHIBITS AND EXHIBITS P-1 TO
P-19**

ORIGINAL

Mtre. Neil G. Oberman
noberman@spiegelsohmer.com

Our ref.: 256885-002



1000-1255 Peel Street
Montréal, Québec H3B 2T9
Direct Line: (514) 875 5310
Fax: (514) 875-8237

BS-3255