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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

CAT BROOKS and RASHEED SHABAZZ, individually and on behalf of all others similarly situated,

Plaintiffs,

v.

THOMSON REUTERS CORPORATION,

Defendant.

Case No. 3:21-cv-01418-EMC

DECLARATION OF KEVIN APPOLD IN SUPPORT OF THOMSON REUTERS' STATEMENT IN RESPONSE TO PLAINTIFF'S ADMINISTRATIVE MOTION TO CONSIDER WHETHER ANOTHER PARTY'S MATERIALS SHOULD BE SEALED

I, Kevin Appold, declare as follows:

1. I am Vice President, Product, US Public Records at West Publishing Corporation ("West"), a wholly owned subsidiary of Thomson Reuters Corporation ("Thomson Reuters'). For purposes of this declaration, I will refer to "Thomson Reuters" even when "West" is the proper legal entity. I have been employed by West for more than 27 years. I submit this declaration in support of Thomson Reuters' Statement in Response to Plaintiffs' Administrative Motion to Consider Whether Another Party's Materials Should be Sealed ("Statement"). I have personal knowledge of the facts set forth herein, and if called as a witness, could and would testify competently thereto.

2. For the reasons more fully explained in the "Basis to Seal" columns of Exhibits 2, 3, and 4 to Thomson Reuters' Statement, the public disclosure of the text identified in the "Portion(s) to Seal" column of Exhibit 2 and 3, and public disclosure of the documents identified in the "Document" column of Exhibit 4, would cause harm to Thomson Reuters.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 7, 2022, in Eagan, Minnesota.

Kevin Appold