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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, the wholly owned subsidiary of Thomson Reuters Corporation that owns and operates the CLEAR platform. For purposes of this declaration, I will refer to West and Thomson Reuters Corporation collectively as "Thomson Reuters." I have been employed by Thomson Reuters for more than 27 years. I manage a team responsible for continued development and operation of the CLEAR platform, and I have led the Product Management team responsible for the integration and ongoing design of CLEAR since Thomson Reuters acquired CLEAR in 2008. I submit this declaration in support of Thomson Reuters' Administrative Motion to File Under Seal Confidential Information. I make this declaration based upon personal knowledge and if called upon to do so I could and would testify competently to the facts set forth herein.

2. Detailed information related to CLEAR's capabilities, especially when particularized to specific content available through CLEAR, is not available to the general public, including CLEAR competitors, and is instead ordinarily only available to credentialed and authorized CLEAR customer(s) who certified a permissible use to access the record or report. Public disclosure of this information would harm Thomson Reuters because CLEAR competitors could leverage the detailed information for their own competitive purposes. And the information could be taken out of context to give a misleading or inaccurate picture of CLEAR and related business practices.

3. The public disclosure of financial information related to the CLEAR platform (e.g., revenue, profits, and costs) that is not already public (e.g, in annual reports) would harm Thomson Reuters because CLEAR competitors could leverage the detailed information for their own competitive purposes. And the information could be taken out of context to give a misleading or inaccurate picture of CLEAR and related business practices.

4. Public disclosure of the estimates provided by Plaintiffs' experts in this case regarding CLEAR finances and/or the portion of revenue, profits, costs, etc. that are purportedly attributable to California would harm Thomson Reuters. Some of these estimates may reveal confidential information about CLEAR finances. And the estimates are inaccurate, or at least

grossly misleading, and could therefore result in a misleading or inaccurate picture of CLEAR and related business practices.

[signature on following page]

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

Executed on August 29th, 2024, in Eagan, MN.

Kevin Appold