

Susan D. Fahringer, Bar No. 162978
SFahringer@perkinscoie.com
Nicola C. Menaldo, WA Bar No. 44459
(*pro hac vice* application forthcoming)
NMenaldo@perkinscoie.com
PERKINS COIE LLP
1201 Third Avenue, Suite 4900
Seattle, WA 98101-3099
Telephone: 206.359.8000
Facsimile: 206.359.9000

Gabriella Gallego, Bar No. 324226
GGallego@perkinscoie.com
PERKINS COIE LLP
3150 Porter Drive
Palo Alto, CA 94304-1212
Telephone: 650.838.4300
Facsimile: 650.838.4350

Attorneys for Defendant
Thomson Reuters Corporation

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

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

Plaintiffs,

v.

THOMSON REUTERS CORPORATION,
Defendant.

Case No. 4:21-cv-1418-KAW

**STIPULATION TO EXTEND TIME FOR
DEFENDANT TO RESPOND TO
COMPLAINT PURSUANT TO LOCAL
RULE 6-1(a)**

Current Response Date: March 5, 2021

New Response Date: April 5, 2021

Pursuant to Federal Rule of Civil Procedure 6(b) and Civil Local Rule 6-1(a), Defendant
Thomson Reuters Corporation (“Thomson Reuters”) and Plaintiffs Cat Brooks and Rasheed
Shabazz (“Plaintiffs”), by and through their respective counsel, hereby stipulate as follows:

1 WHEREAS, Plaintiffs filed the Complaint on or about December 3, 2020 (“Complaint”);

2 WHEREAS, on January 29, 2021, Plaintiffs effected service of process of the summons
3 and Complaint on Thomson Reuters America Corporation as the “general manager in this state”
4 for Thomson Reuters;

5 WHEREAS, Thomson Reuters removed the case to federal court on February 26, 2021;

6 WHEREAS, the deadline to answer or otherwise respond to the Complaint is March 5,
7 2021;

8 WHEREAS, Thomson Reuters has requested, and Plaintiffs have consented to, an
9 additional 30 days for Thomson Reuters to answer or respond to the Complaint;

10 WHEREAS, good cause exists for the agreed extension due to the complexity of the
11 underlying facts and the fact that defense counsel requires additional time to become
12 knowledgeable about the case to prepare an initial pleading;

13 WHEREAS, the requested extension will not affect any of the other dates set in the case;

14 NOW, THEREFORE IT IS HEREBY STIPULATED by and between the parties, through
15 their respective counsel, that Thomson Reuters shall answer or otherwise respond to the
16 Complaint by April 5, 2021.
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1 DATED: March 3, 2021

PERKINS COIE LLP

3 By: /s/ Susan D. Fahringer

4 Susan D. Fahringer, Bar No. 162978
SFahringer@perkinscoie.com

5 Attorneys for Defendant
6 Thomson Reuters Corporation

8 DATED: March 3, 2021

9 By: /s/ Andre M. Mura

10 Andre M. Mura, Bar No. 298541
amm@classlawgroup.com

11 Attorneys for Plaintiffs

12 Eric H. Gibbs
13 Andre M. Mura
14 Amanda M. Karl
15 Jeffrey B. Kosbie
16 GIBBS LAW GROUP
17 505 14th Street, Suite 1110
18 Oakland, CA 94612
19 Telephone: (510) 350-9700
20 Fax: (510) 350-9701
ehg@classlawgroup.com
amm@classlawgroup.com
amk@classlawgroup.com
jbk@classlawgroup.com

21 *Attorneys for Plaintiffs*

22 Benjamin Elga (pro hac vice forthcoming)
23 Alice Buttrick (pro hac vice forthcoming)
24 JUSTICE CATALYST LAW INC.
25 81 Prospect St., 7th Floor
26 Brooklyn, NY 11201
27 (518) 732-6703
belga@justicecatalyst.org
abuttrick@justicecatalyst.org

28 *Attorneys for Plaintiffs*

Jennifer D. Bennett
Neil K. Sawhney
GUPTA WESSLER PLLC
100 Pine Street, Suite 1250
San Francisco, CA 94111
(415) 573-0336
jennifer@guptawessler.com
neil@guptawessler.com

Attorneys for Plaintiffs

Albert Fox Cahn (pro hac vice forthcoming)
SURVEILLANCE TECHNOLOGY
OVERSIGHT PROJECT
40 Rector Street, 9th Floor
New York, NY 10006
albert@stopspying.org

Attorneys for Plaintiffs

ATTESTATION

Pursuant to Civil Local Rule 5-1(i), I attest that concurrence in the filing of this document has been obtained from the other signatory.

/s/ Susan D. Fahringer

Susan D. Fahringer