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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 NICOLA MENALDO  
IN SUPPORT OF DEFENDANT'S  
MOTION TO STRIKE PURSUANT TO  
CALIFORNIA CODE OF CIVIL  
PROCEDURE § 425.16**

1 I, Nicola Menaldo, declare:

2 1. I am an attorney duly licensed to practice law before the courts of the State of  
3 Washington and I have been admitted *pro hac vice* to the Northern District of California. I am a  
4 partner of the law firm Perkins Coie, attorney of record for the Defendant Thomson Reuters  
5 Corporation, and I make this declaration in support of Defendant's Motion to Strike pursuant to  
6 California Code of Civil Procedure Section 425.16, otherwise known as California's Anti-SLAPP  
7 statute. If called upon to, I can testify competently and from personal knowledge to the following:

8 2. On April 5, 2021, I supervised and directed the transmission of an email to the  
9 Judicial Council on my behalf containing a copy of the endorsed, filed caption page of  
10 Defendant's Motion to Strike filed on April 5, 2021.

11  
12 I declare under penalty of perjury that the foregoing is true and correct.

13 Executed on April 5, 2021, at Seattle, Washington.

14  
15 /s/Nicola Menaldo

Nicola Menaldo