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**UNITED STATES DISTRICT COURT FOR THE
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-1418-EMC

**JOINT STIPULATION AND
[PROPOSED] ORDER SETTING
MOTION TO DISMISS BRIEFING
SCHEDULE**

1 Pursuant to this Court's General Civil Standing Order ¶ 4, as well as Local Rules 7-2 and 7-3
2 and its Commentary, Plaintiffs Cat Brooks and Rasheed Shabazz and Defendant Thomson Reuters
3 Corporation, by and through their respective counsel, stipulate as follows:

4 WHEREAS, Plaintiffs filed a class action complaint alleging Thomson Reuters, as part of its
5 CLEAR database, collected and sold Californians' data without their consent;

6 WHEREAS, Defendant filed a motion to dismiss and motion to strike on April 5, 2021;

7 WHEREAS, the motion to dismiss raises complex legal issues concerning privacy in the digital
8 sphere;

9 WHEREAS, the parties would benefit from longer time periods for response and reply than
10 those contemplated by Local Rule 7-3; and

11 WHEREAS, in light of the complexity of the motion to dismiss the parties have agreed to an
12 alternative briefing schedule;

13 IT IS HEREBY STIPULATED that Plaintiffs' opposition brief will be due on May 12, 2021;
14 Defendant's reply brief will be due on May 27, 2021; and the Court will hear the motion to dismiss
15 and motion to strike on June 24, 2021, or at a later date set by the Court.

16 IT IS SO STIPULATED.

17
18 Dated: April 8, 2021

Respectfully submitted,

19 By: /s/ Andre M. Mura

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*Attorneys for Plaintiffs Cat Brooks and
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1 DATED: April 8, 2021

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Attorneys for Defendant
Thomson Reuters Corporation

1 **ATTESTATION**

2 Pursuant to Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document
3 has been obtained from the other signatory.

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5 /s/ Andre M. Mura
6 Andre M. Mura
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1 **[PROPOSED] ORDER**

2 Having considered the parties' Stipulation, the Court hereby GRANTS the parties' Stipulation.

3 It is hereby ordered that:

4 Plaintiffs' opposition to Defendant's motion to dismiss and motion to strike will be due on May
5 12, 2021;

6 Defendant's reply supporting its motion to dismiss and motion to strike will be due on May 27,
7 2021; and

8 The Court will hear Defendant's motion to dismiss and motion to strike on June 24, 2021, at
9 1:30 p.m.

10
11 PURSUANT TO STIPULATION, IT IS SO ORDERED.

12
13 DATED: _____

EDWARD M. CHEN
United States District Judge