

Eric H. Gibbs (SBN 178658)
Andre M. Mura (SBN 298541)
Amanda M. Karl (SBN 301088)
Jeffrey B. Kosbie (SBN 305424)
GIBBS LAW GROUP LLP
505 14th Street, Suite 1110
Oakland, California 94612
(510) 350-9700 (tel.)
(510) 350-9701 (fax)
ehg@classlawgroup.com
amm@classlawgroup.com
amk@classlawgroup.com
jbk@classlawgroup.com

Attorneys for Plaintiffs and the Proposed Class

[Additional counsel on signature page]

**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**

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

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

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

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

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

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

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

IT IS SO STIPULATED.

Dated: April 8, 2021

Respectfully submitted,

By: /s/ Andre M. Mura

Eric H. Gibbs (SBN 178658)
Andre M. Mura (SBN 298541)
Amanda M. Karl (SBN 301088)
Jeffrey B. Kosbie (SBN 305424)
GIBBS LAW GROUP LLP
505 14th Street, Suite 1110
Oakland, California 94612
Telephone: (510) 350-9700
Facsimile: (510) 350-9701
ehg@classlawgroup.com
amm@classlawgroup.com
amk@classlawgroup.com
jbk@classlawgroup.com

1 Jennifer D. Bennett (SBN 296726)

Neil K. Sawhney (SBN 300130)
GUPTA WESSLER PLLC
100 Pine Street, Suite 1250
San Francisco, CA 94111
Telephone: (415) 573-0336
jennifer@guptawessler.com
neil@gutawessler.com

Benjamin Elga (pro hac vice)
Alice Buttrick (pro hac vice)
JUSTICE CATALYST LAW INC.
81 Prospect Street, 7th Floor
Brooklyn, NY 11201
Telephone: (518) 732-6703
belga@justicecatalyst.org
abuttrick@justicecatalyst.org

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

*Attorneys for Plaintiffs Cat Brooks and
Rasheed Shabazz and the Proposed Class*

1 DATED: April 8, 2021

PERKINS COIE LLP

2 By: /s/ Nicola C. Menaldo

3 Susan D. Fahringer
4 Nicola C. Menaldo, *pro hac vice*
5 Anna M. Thompson, *pro hac vice*
6 1201 Third Avenue, Suite 4900
7 Seattle, WA 98101-3099
8 Telephone: (206) 359-8000
9 Facsimile: (206) 359-9000
10 SFahringer@perkinscoie.com
11 NMenaldo@perkinscoie.com
12 AnnaThompson@perkinscoie.com

13 Gabriella Gallego
14 **PERKINS COIE LLP**

15 3150 Porter Drive
16 Palo Alto, CA 94304-1212
17 Telephone: (650) 838-4300
18 Facsimile: (650) 838-4350
19 GGallego@perkinscoie.com

20 *Attorneys for Defendant*
21 *Thomson Reuters Corporation*

ATTESTATION

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

/s/ Andre M. Mura
Andre M. Mura

~~PROPOSED~~ ORDER

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

It is hereby ordered that:

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

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

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

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: April 12, 2021


EDWARD M. CHEN
United States District Judge