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

8 WHEREAS, the parties previously stipulated, and the Court ordered, that Plaintiffs' opposition
9 brief will be due on May 12, 2021, Defendant's reply brief will be due on May 27, 2021, and the Court
10 will hear the motion to dismiss and motion to strike on June 24, 2021 (Dkt. 30);

11 WHEREAS, since the parties' prior scheduling stipulation, a key member of Plaintiffs' counsel
12 underwent, and is currently recovering from, surgery;

13 WHEREAS, in light of this development and the complexity of the motion to dismiss, the
14 parties have agreed to a one-week extension to the briefing schedule; and

15 WHEREAS, the parties' proposed schedule change does not impact the motion hearing date,
16 providing the Court with 15 days between the completion of briefing and the scheduled hearing;

17 IT IS HEREBY STIPULATED that Plaintiffs' opposition brief will be due on May 19, 2021,
18 and Defendant's reply brief will be due on June 9, 2021.

19 IT IS SO STIPULATED.

20
21 Dated: May 5, 2021

Respectfully submitted,

22 By: /s/ Andre M. Mura

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*Attorneys for Plaintiffs Cat Brooks and
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1 DATED: May 5, 2021

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By: /s/ Susan D. Fahringer

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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
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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 1) Plaintiffs' opposition to Defendant's motion to dismiss and motion to strike will be due on May
5 19, 2021; and
6 2) Defendant's reply supporting its motion to dismiss and motion to strike will be due on June 9,
7 2021.

8
9 PURSUANT TO STIPULATION, IT IS SO ORDERED.

10 DATED: 05/07/2021
11 _____



EDWARD M. CHEN
United States District Judge