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

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 **STIPULATION TO SET CASE SCHEDULE AND [PROPOSED] ORDER** Judge: Hon. Edward M. Chen

Pursuant to the Court's Minute Entry (Docket 55), Plaintiffs Cat Brooks and Rasheed Shabazz and Defendant Thomson Reuters Corporation ("Thomson Reuters"), by and through their respective counsel, hereby stipulate to the following case schedule:

Event	Deadline
Exchange of Initial Disclosures	September 3, 2021
Disclosure of Primary Class Certification Experts	March 1, 2022
Disclosure of Class Certification Rebuttal Experts	May 17, 2022
Close of Class Certification Expert Discovery	June 17, 2022
Deadline to Amend Pleadings	July 18, 2022
Motion for Class Certification	July 18, 2022
Opposition to Class Certification	September 12, 2022
Reply Supporting Class Certification	October 24, 2022
Hearing on Motion for Class Certification	December 8, 2022
Deadline to Pursue Private Mediation	Court to set deadline at December 14, 2021 case management conference (*see* Docket 55)
Close of Fact Discovery	February 8, 2023

Disclosure of Trial Experts	The parties shall meet and confer within 14 days of a ruling on the motion for class certification to set deadlines for trial expert disclosures and discovery, pre-trial deadlines, and a trial date.
Disclosure of Rebuttal Trial Experts	Defer setting this deadline until after a ruling on class certification.
Close of Expert Discovery	Defer setting this deadline until after a ruling on class certification.
Dispositive Motion Deadline	Defer setting this deadline until after a ruling on class certification.
Pretrial conference	Defer setting this deadline until after a ruling on class certification.
Trial	Defer setting this deadline until after a ruling on class certification.

DATED: August 26, 2021

GIBBS LAW GROUP LLP

By: /s/ *Andre M. Mura*

Andre M. Mura
Eric H. Gibbs
Amanda M. Karl
Jeffrey B. Kosbie
505 14th Street, Suite 1110
Oakland, CA 94612
Telephone: (510) 350-9700
Fax: (510) 350-9701
ehg@classlawgroup.com
amm@classlawgroup.com
amk@classlawgroup.com
jbk@classlawgroup.com

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

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

Benjamin Elga (pro hac vice)
Alice Buttrick (pro hac vice)
JUSTICE CATALYST LAW INC.
123 William Street, 16th floor
New York, NY 10038
Telephone: (518) 732-6703
belga@justicecatalyst.org
abuttrick@justicecatalyst.org

Attorneys for Plaintiffs

DATED: August 26, 2021

PERKINS COIE LLP

By: /s/ *Susan D. Fahringer*

Susan D. Fahringer, Bar No. 21567
Nicola C. Menaldo (pro hac vice)
Anna M. Thompson (pro hac vice)
1201 Third Avenue, Suite 4900
Seattle, WA 98101-3099
Telephone: (206) 359-8000
Facsimile: (206) 359-9000
SFahringer@perkinscoie.com
NMenaldo@perkinscoie.com
AnnaThompson@perkinscoie.com

Gabriella Gallego, Bar No. 324226
PERKINS COIE LLP
3150 Porter Drive
Palo Alto, CA 94304-1212
Telephone: (650) 838-4300
Facsimile: (650) 838-4350
GGallego@perkinscoie.com

Attorneys for Defendant
Thomson Reuters Corporation

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated:

EDWARD M. CHEN
United States District Judge

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*