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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 **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

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DATED: August 26, 2021

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Thomson Reuters Corporation

[~~PROPOSED~~] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: August 26, 2021



EDWARD M. CHEN
United States District Judge