

1 Eric H. Gibbs (SBN 178658)
2 Andre M. Mura (SBN 298541)
3 Amanda M. Karl (SBN 301088)
4 Jeffrey B. Kosbie (SBN 305424)
5 **GIBBS LAW GROUP LLP**
6 505 14th Street, Suite 1110
7 Oakland, California 94612
8 Telephone: (510) 350-9700
9 Facsimile: (510) 350-9701
10 ehg@classlawgroup.com
11 amm@classlawgroup.com
12 amk@classlawgroup.com
13 jbk@classlawgroup.com

14 *Attorneys for Plaintiffs and the Proposed*
15 *Class*

16 [Additional counsel on signature page]

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UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

16 CAT BROOKS and RASHEED SHABAZZ,
17 individually and on behalf of all others
18 similarly situated,

19 Plaintiffs,

20 v.

21 THOMSON REUTERS CORPORATION,

22 Defendant.

Case No. 3:21-cv-01418-EMC

JOINT STATUS REPORT

Date: December 14, 2021
Time: 2:30 p.m.
Place: Courtroom 5, 17th Floor
Judge: Hon. Edward M. Chen

Pursuant to this Court's Minute Entry dated August 17, 2021 (Docket 55) and L.R. 16-10(d), Plaintiffs Cat Brooks and Rasheed Shabazz ("Plaintiffs") and Defendant Thomson Reuters Corporation (collectively, the "Parties") submit this Joint Status Report in advance of the Case Management Conference set for December 14, 2021, in the above-captioned action.

1. BACKGROUND

The Complaint in this case was filed in California Superior Court on December 3, 2020, and the action was removed to this Court on February 26, 2021. *See* Dkt. 1. On August 16, 2021, the Court denied in part and granted in part Defendant's Motion to Dismiss the Complaint pursuant to Federal Rule of Civil Procedure ("Rule") 12(b)(6), and Motion to Strike Complaint pursuant to Cal. Civ. Proc. Code § 425.16(b)(1). *See* Dkt. 54. The Court entered the Parties' stipulated case schedule on August 26, 2021, *see* Dkt. 59, and Defendant filed its Answer to the Complaint on September 10, 2021. *See* Dkt. 60.

2. DISCOVERY

The Parties have met and conferred pursuant to Rule 26(a)(1), made their initial disclosures, and exchanged written discovery requests. Defendant has responded to Plaintiffs' discovery requests, has made an initial production of responsive documents, and anticipates supplementing that production on a rolling basis with a second production occurring once a protective order is in place, and additional productions occurring on a rolling basis thereafter. The Parties are meeting and conferring regarding Defendant's responses and its proposed timing for a rolling production. Plaintiffs' responses to Defendant's written discovery requests are due December 8, 2021. The Parties have exchanged drafts of a Stipulated Order regarding Discovery of Electronically Stored Information and Protective Order regarding the confidential treatment of certain documents, and they anticipate submitting stipulated forms of such orders later this month.

3. SCHEDULING

The Parties agree that private mediation is appropriate for this case, and they believe that a deadline of July 1, 2022, would be appropriate.

Dated: December 7, 2021

Respectfully submitted,

/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, CA 94612

Telephone: (510) 350-9700

Facsimile: (510) 350-9701

ehg@classlawgroup.com

amm@classlawgroup.com

amk@classlawgroup.com

jbk@classlawgroup.com

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)

JUSTICE CATALYST LAW INC.

123 William Street, 16th floor

New York, NY 10038

Telephone: (518) 732-6703

belga@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*

Dated: December 7, 2021

PERKINS COIE LLP

Susan D. Fahringer

Susan D. Fahringer, Bar No. 21567

Nicola C. Menaldo, *pro hac vice*

Anna M. Thompson, *pro hac vice*

PERKINS COIE LLP

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

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 Mura