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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

ESI STIPULATION AND [~~PROPOSED~~] ORDER

Judge: Hon. Edward M. Chen

The following ESI Stipulation and [Proposed] Order ("ESI Protocol") shall govern the production of documents, including electronically stored information in the above-captioned matter (the "Litigation").

To expedite discovery in the Litigation, pursuant to this Court's authority and with the consent of the Parties, it is agreed:

1. PURPOSE

This Order will govern discovery of electronically stored information ("ESI") in this case as a Supplement to the Federal Rules of Civil Procedure, this Court's Guidelines for the Discovery of Electronically Stored Information, and any other applicable orders and rules.

2. COOPERATION

The Parties are aware of the importance the Court places on cooperation and commit to cooperate in good faith throughout the matter consistent with this Court's Guidelines for the Discovery of ESI.

3. PROPORTIONALITY

The proportionality standard set forth in Federal Rule of Civil Procedure 26(b)(2)(C) must be applied in this case when formulating a discovery plan. To further the application of the proportionality standard in discovery, requests for production of ESI and related responses should be reasonably targeted, clear, and as specific as possible.

4. LIAISON

The Parties' outside counsel each have e-discovery liaisons who are and will be knowledgeable about and responsible for discussing their respective ESI. Each e-discovery liaison will be, or have access to those who are, knowledgeable about the technical aspects of e-discovery, including the location, nature, accessibility, format, collection, search methodologies, and production of ESI in this matter. The Parties will rely on the liaisons, as needed, to confer about ESI and to help resolve disputes without court intervention.

5. **PRESERVATION**

The parties have discussed their preservation obligations and needs and agree that preservation of potentially relevant ESI will be reasonable and proportionate. To reduce the costs

and burdens of preservation and to ensure proper ESI is preserved, the parties agree that:

a) Only ESI created or received on or after January 1, 2015, and ESI regarding the creation and development of CLEAR that predates January 1, 2015, will be preserved;

d) These data sources are not reasonably accessible because of undue burden or cost pursuant to Fed. R. Civ. P. 26(b)(2)(B) and ESI from these sources will be preserved but not searched, reviewed, or produced, absent a showing of good cause:

i. Any form of media upon which backup data is maintained in a party's normal or allowed processes, including but not limited to, backup tapes, discs, SAN or other form of media

e) Among the sources of data the parties agree are not reasonably accessible, the parties agree not to preserve the following:

i. Deleted, slack, fragmented, or other data only accessible by forensics.

ii. Random access memory (RAM), temporary files, or other ephemeral data that are difficult to preserve without disabling the operating system.

iii. On-line access data such as temporary internet files, history, cache, cookies, and the like.

iv. Data in metadata fields that are frequently updated automatically, such as last-opened dates (see also Section (E)(5)).

v. Server, system or network logs, provided that logs and other data sources related to or tracking the movement of data accessible through CLEAR shall be preserved.

vi. Data remaining from systems no longer in use that is unintelligible on the systems in use or that is no longer in the custody or control of the producing party.

vii. Electronic data (e.g., email, calendars, contact data, and notes) sent to or from mobile devices (e.g., iPhone, iPad, Android devices), provided that a copy of all such electronic data is automatically saved in real time elsewhere (such as on a server, laptop, desktop computer, or "cloud" storage).

viii. Data regarding individuals and/or businesses available through CLEAR that is controlled by third-party sources and is or becomes no longer accessible to Thomson Reuters.

6. **PRODUCTION MEDIA & PROTOCOL**

The production media for document productions shall be secure FTP link provided via email at the time a production letter is emailed, unless the Parties agree otherwise. If the Parties agree, production media may be a CD-ROM, DVD, external hard drive (with standard PC compatible interface), or USB drive, so long as such production media is sent no slower than overnight delivery via FedEx, UPS, or USPS. Each item of production media (or in the case of FTP productions, each production transmittal letter) shall include: (1) text referencing that it was produced in the Litigation, (2) the production date, and (3) the Bates number range of the materials contained on such production media item.

7. DEFINITIONS

a. **"Discovery Material"** is defined as all products of discovery and all information derived therefrom, including, but not limited to, documents, objects and things, deposition testimony, interrogatory/request for admission responses, and any copies, excerpts or summaries thereof, produced by any party in the above-captioned matter.

b. **"Documents"** shall have the same definition as set forth in Federal Rule of Civil Procedure 34.

c. **"Electronically stored information"** or **"ESI,"** as used herein, means and refers to computer generated information or data of any kind, stored in or on any storage media located on computers, file servers, disks, tape or other real or virtualized devices or media. Non-limiting examples of ESI include the examples listed below. Inclusion in the list does not mean that the Parties possess relevant ESI for every item in the list, nor does it mean that such ESI is relevant in this case or that it would be reasonable and proportional to collect and review such ESI.

i. Digital communications (*e.g.*, e-mail, voice mail, text messaging, instant messaging, and ephemeral messaging);

ii. E-Mail Server Stores (*e.g.*, Lotus Domino .NSF or Microsoft Exchange

.EDB);

iii. Word processed documents (*e.g.*, Word or WordPerfect files and drafts);

iv. Spreadsheets and tables (*e.g.*, Excel or Lotus 123 worksheets);

v. Accounting Application data (*e.g.*, QuickBooks, Money, Peachtree data);

vi. Image and Facsimile Files (*e.g.*, .PDF, .TIFF, .JPEG., .GIF images);

vii. Sound Recordings (*e.g.*, .WAV and .MP3 files);

viii. Video and animation (*e.g.*, .AVI and .MOV files);

ix. Databases (*e.g.*, Access, Oracle, SQL Server Data, SAP);

x. Contract and Relationship Management Data (*e.g.*, Outlook, ACT!);

xi. Calendar and Diary Application Data (*e.g.*, Outlook PS, blog entries);

xii. Online Access Data (*e.g.*, Temporary Internet Files, History, Cookies);

xiii. Presentations (*e.g.*, PowerPoint, Corel Presentations);

xiv. Project Management Application Data;

xv. Computer Aided Designs/Drawing Files;

xvi. Backup and Archival Files (*e.g.*, Veritas, .ZIP, .GHO);and

xvii. Cloud based or other virtualized ESI, including application, infrastructure, and data.

d. **"Metadata"** means and refers to the structural information of a file that contains data about the file, as opposed to describing the content of a file. Sedona Conference Glossary, 5th Ed., The Sedona Conference Journal, Vol. 21 at 337.

e. **"Native Format"** means the format of ESI in which it was generated and/or as used by the Producing Party in the usual course of its business and in its regularly conducted activities.

f. **"OCR Text"** means text generated through an Optical Character Recognition Process.

g. **"Plaintiffs"** as used herein shall refer to Cat Brooks, Rasheed Shabazz, and any and all other individually named Plaintiffs in this case.

h. **"Producing Party"** means a party or any third-party from which production of

Documents is sought.

i. **"Requesting Party"** means a party seeking production of documents.

j. **"Thomson Reuters Corporation" and "Defendant"** as used herein shall mean Defendant Thomson Reuters Corporation, as identified in the Litigation, and any subsequently named defendant affiliated with Defendant Thomson Reuters Corporation and represented by the same counsel.

8. SEARCH METHODOLOGIES

a. **Information to be exchanged.** Within a reasonable time after entry of this Order, and within a reasonable time after service of any subsequent request for production of documents, unless the Parties agree the exchange is not necessary, the Parties agree to exchange information regarding:

i. The identity and job title of custodians or categories of custodians possessing relevant information and from whom documents will be collected or produced;

ii. The location(s) and description(s) of relevant data sources, including custodial and non-custodial data sources, structured data sources, and applications;

iii. A description of any potentially discoverable ESI that the party is aware of having been lost or destroyed; and,

iv. A description of any potentially discoverable ESI that the party contends is inaccessible or only of limited accessibility and, hence, not producible by that party without undue burden and/or expense, including:

1. The reasons for the party's contention regarding accessibility; and,

2. The proposed capture and retrieval process available (if any) for identification and/or recovery of the information deemed inaccessible (including cost estimates if readily available).

b. **ESI Search.** The parties agree that in responding to an initial or subsequent Fed. R. Civ. P. 34 request, or earlier if appropriate, they will meet and confer about methods to search

ESI in order to identify ESI that is subject to production in discovery and filter out ESI that is not subject to discovery. Agreement on a search methodology does not relieve a party of its obligations under the Federal Rules to conduct a reasonable search and produce all documents and ESI that are non-privileged, relevant, and responsive of which it is aware. Except as provided in the following paragraph, such documents should be produced promptly and should not be withheld pending agreements regarding (or production of) other aspects of discovery.

The Parties agree to meet and confer in good faith before a party uses predictive coding, continuous active learning, or any other technology-assisted review or advanced analytics (collectively, "TAR") to streamline the document production required by a Requesting Party. The Parties shall attempt to resolve any objections to the use of TAR and to agree to a protocol governing the implementation and use of TAR before seeking relief from the Court. A party will not use TAR before any objections to such use are resolved.

9. TESTING AND VALIDATION

If a party uses agreed upon search terms to identify documents responsive to requests for production and produces more than 10,000 documents in the litigation that were identified through those search terms, at the substantial completion of the document review process, that party shall disclose the number of documents that hit on the agreed search terms, the number of documents produced or withheld as privileged, the number of documents identified as non-responsive during the course of review, and the process for quality control and validation of review results. If the other party believes additional testing or validation is required, including but not limited to a quality check of the data that is not manually reviewed (the Null Set) by selecting a statistically random sample of documents from the Null Set, the parties agree to meet and confer in good faith regarding a testing and validation protocol that is appropriately informed by the technology and process used to conduct the review.

10. PRODUCTION FORMATS

a. **Production Format/TIFFs.** Unless the Parties agree to a different format, documents should be produced with TIFF images and named according to the Bates number of the corresponding TIFF image. Each .tiff file should be assigned a unique name matching the

Bates number of the corresponding image. The Bates number should be consistent across the production, contain no special characters, and be numerically sequential within a given document. Attachments to documents should be assigned Bates numbers that directly follow in sequential order the Bates numbers on the documents to which they were attached. If a Bates number or set of Bates numbers is skipped, the skipped number or set of numbers should be noted, for example with a placeholder. All images should be provided in a single-page Group IV TIFF with a resolution of 300 DPI. Bates numbers and confidentiality designations should be electronically branded on each produced .tiff image. These .tiff images should be provided in a separate folder and the number of TIFF files per folder should be limited to 1,000 files.

b. **Text Files.** All unredacted documents should be provided with complete document-level extracted text files, where extracted text is available. Where extracted text is not available, OCR text will be provided where reasonably feasible. Document-level OCR text files should be provided for any unredacted portions of redacted documents and for all hard copy scanned documents and other imaged documents that do not have extracted text. If a party is not providing OCR for a set of documents, it will identify those documents by Bates number at the time of production. The extracted full text and/or OCR text for all deliverables should be in separate document-level TXT files. These TXT files may either be provided in a separate folder or included in the same folder as the corresponding images. The number of TXT files per folder should be limited to 1,000 files.

c. **Native File Production.**

i. Responsive spreadsheets (e.g., Excel), presentation files (e.g., PowerPoint), audio files, and video files shall be produced in native format.

ii. A TIFF placeholder embossed with the corresponding confidentiality designation and Bates number shall be produced for all ESI produced in native format. The TIFF placeholder should include the words "Document produced in native format."

iii. The file name for documents produced in native should be the Bates number for the document along with the applicable confidentiality

designation (e.g., "TR000000001 – Confidential"), with the original file name identified in the File Name metadata field specified in Exhibit A.

iv. Native files will not be produced for redacted documents, except for Excel or similar documents, which shall be natively redacted if the original metadata (less redacted text) can be preserved and produced. Documents that cannot be natively redacted may be produced as TIFF images with OCR text files in lieu of a native file. Responsive ESI produced in native format shall be produced with all the metadata contained in or associated with that file to the extent technologically possible. If a party identifies other forms of responsive ESI that it would prefer to produce or receive in native format, the producing and receiving parties shall meet and confer in good faith to address the issue.

v. Extracted text taken from native files will be provided at a document level. There will be one text file per document, using the same name as the beginning Bates number (Document ID) of the document. The extracted text file for a document will reside in the same location (file directory) as the images for that document. The text file associated with any redacted document will exclude redacted text (i.e., the Producing Party can OCR the redacted image of the unstructured ESI and replace the original extracted text).

vi. No party may attach to any pleading or any correspondence or submit as an exhibit or in any other manner use at a deposition or any other judicial proceeding a copy of any native format document produced by any party without ensuring that either the corresponding slip sheet is attached to the document or the corresponding Bates number and confidentiality legend, as designated by the Producing Party, appears on or is associated with the document.

d. **Embedded Objects.** If documents contain embedded objects (*e.g.*, a spreadsheet

embedded in a word processing document), the Parties will produce embedded objects as separate files and treat them as an attachment to the parent document, with the exception of embedded signatures, including logos or images that are contained within such signatures. If a Party identifies other embedded objects with no independent value, the Parties agree to meet and confer as to whether it must be produced.

e. **Color.** ESI containing color (for example, graphs, pictures, or color marketing materials) will be produced as color images for each such document if color is necessary to reasonably understand the content of the ESI (e.g., color charts). Otherwise, a Party may request the Producing Party to Produce particular documents or categories of documents in color where reasonable.

f. **Bates numbering.** All Documents must be assigned a Bates number that must be unique across the entire document production and sequentially numbered within a given document. Producing Parties must emboss Bates numbers on all image files in a manner that does not obscure any part of the underlying image and is, to the extent possible, oriented in the same manner as the majority of the text on the page. The Parties shall cooperate with reasonable requests regarding Bates number formatting necessary for litigation support application use. Each Bates number shall be no more than 18 characters in length and include leading zeros so that all Bates numbers produced by a Party have the same number of digits.

g. **De-duplication.** The Parties shall make reasonable efforts to de-duplicate ESI. ESI shall be de-duplicated horizontally across custodians. ESI will be considered duplicative if it has the same MD5 or SHA-1 hash value at the family level. Attachments should not be eliminated as duplicates for purposes of production, unless the parent and all attachments are also duplicates. An email that contains content in the BCC or other blind copy field shall not be treated as a duplicate of an email that does not contain identical content in those fields, even if all remaining content in the email is identical. All custodians who were in possession of a de-duplicated document must be identified in the Custodians metadata field specified in Exhibit A.

h. **Confidentiality Endorsements.** Except for documents produced in native format, the Producing Party must brand any confidentiality or similar endorsements in a corner of the

TIFF images pursuant to any protective order entered in this case. Those endorsements must be in a consistent font type and size, and must not obscure any part of the underlying image or Bates number, to the extent possible.

i. **Email Threading.** The Parties may utilize "email thread suppression." Email thread suppression means reducing duplicative production of email threads by producing the most inclusive email in a thread of emails, as well as any emails that have unique attachments or senders/recipients (including blind copy).

j. **Metadata fields and Processing.** Each of the metadata and index fields set forth in Exhibit A will be produced for that document. If the Producing Party becomes aware of an issue extracting metadata or any other processing, the Producing Party must notify the other party and meet and confer to arrive at a mutually acceptable resolution of the issue. The Parties are not obligated to create or manually code any of the fields in Exhibit A if such fields cannot be extracted from a document, with the exception of metadata referring to characteristics of the document production process itself, such as Bates numbers, confidentiality designations, and redactions.

k. **Parent-Child Relationships.** Parent-child relationships refer to the association between an attachment and its parent document. Parent-child relationships must be preserved. Family relationships often exist between an email and its attachments, but can also be found amongst stand-alone documents and files originally contained within that parent document, which are subsequently de-embedded as part of discovery processing. For example, a PowerPoint document with embedded Excel spreadsheets, for which the spreadsheets would be treated as attachments to the PowerPoint.

l. **Attachments.** The Parties agree to produce complete documents when any part of the document (including parents or attachments) is responsive. If the Producing Party withholds entire files within a document family but not the entire family (e.g., an email parent and some but not all of the corresponding attachments), the Producing Party shall produce a Bates numbered slip sheet for each withheld file stating the basis on which the document is withheld. Slip sheets need not be produced for families that are withheld in their entirety.

m. **Redaction.** The Parties agree that where Documents and ESI need to be redacted, they shall be produced solely in TIFF with each redaction clearly indicated, except in cases where the documents cannot be rendered to TIFF in a reasonably usable manner (such as Excel spreadsheets). In that case, the document may be redacted natively as long as a pristine copy of the original document is maintained. If the items redacted and partially withheld from production are audio/visual files, the Producing Party shall provide the unredacted portions of the content, where reasonably feasible. If a party redacts Documents or ESI, the Producing Party will identify that the document has been redacted and the basis for the redaction (*e.g.*, "Privileged—ACC," "Privileged—WP," "Privileged—Both ACC/WP," "PII," or "PHI") in the Redactions metadata field identified in Exhibit A. The redaction also shall be clearly visible on the face of the document. A Party may not redact information on the basis it believes such information to be irrelevant or nonresponsive.

n. **Load Files.** Documents must be provided with (1) a delimited metadata file (.dat or .txt); (2) an image load file (.lfp or .opt); and (3) a text file.

o. **File Size Limitation/Non-Standard Files.** The Parties will meet and confer in good faith to discuss the format of production for structured data such as Microsoft Access databases, non-standard electronic files, and large files or files requiring proprietary software to view, to determine the optimal production format. A Producing Party that desires to produce less than the entire data source will provide the Requesting Party with information about the data sources sufficient to facilitate an informed discussion of the appropriate form or production. This may include information such as database schema, tables and fields, codes, abbreviations, and available report formats.

p. **Compressed Files.** Compressed file types will be decompressed in a reiterative manner to ensure that a zip within a zip is decompressed to the lowest possible compression resulting in individual folders and/or files.

q. **Scanning of Hard-Copy Documents.** Hard copy documents will be scanned and processed as .tiff images with OCR. The Parties will use best efforts to unitize documents (*i.e.*, distinct documents should not be merged into a single record, and a single document should not

be split into multiple records) and maintain document relationships.

r. **Encryption.** To maximize the security of information in transit, any media on which documents are produced may be encrypted by the Producing Party. In such cases, the Producing Party shall transmit the encryption key or password to the Requesting Party, under separate cover, reasonably contemporaneously with sending the encrypted media.

11. SPECIAL ESI ISSUES

a. **Password-Protected or Encrypted.** The Producing Party will take reasonable steps to unlock or decrypt any password-protected or encrypted documents so they can be reviewed and/or produced. In the event that a Producing Party is unable to access the content of documents that are reasonably likely to be responsive to a discovery request, the Producing Party shall produce a Bates numbered slip sheet for each document that cannot be accessed that contains the following language: "Document Cannot be Opened Due to Encryption or Password Protection." The Producing Party shall produce any available metadata for each document that cannot be accessed.

b. **Hidden Text.** ESI items shall be processed in a manner that preserves hidden columns or rows, hidden text or worksheets, speaker notes, tracked changes, and comments, all of which shall be rendered visible on any documents not produced in native format.

c. **System Files.** ESI productions should be de-NISTed using the industry standard list of such files maintained in the National Software Reference Library by the National Institute of Standards & Technology. Other file types may be added or removed from the list of excluded files by agreement of the Parties. This provision is not intended to waive the Parties' right to seek production of specific files or file types that otherwise would be excluded by this provision.

12. PRIVILEGE

a. **Privileged Documents That Need Not Be Logged**

i. **General.** Defendant shall have no obligation to log correspondence concerning the litigation exchanged on or after December 3, 2020, exclusively between employees (including in-house attorneys) and outside counsel, including their respective support staff, paralegals, and secretarial

personnel. Plaintiffs Cat Brooks and Rasheed Shabazz shall have no obligation to log correspondence concerning this litigation exchanged on or after December 3, 2020, exclusively between themselves and outside counsel, including their respective support staff, paralegals, and secretarial personnel. Any other Parties joined in the future, if any, shall have no obligation to log correspondence concerning the litigation exchanged with counsel after the date on which a duty to preserve was triggered.

b. **Format and Contents of Privilege Log**

i. **General.** Privilege logs shall be produced as Excel spreadsheets. Producing Parties shall produce privilege log(s) at time(s) that comport with the requirements of the Federal Rules of Civil Procedure.

ii. **General Contents**. Subject to the limits specified above, documents that a party withholds on the basis of privilege or another discovery protection shall be logged on a privilege log on a document-by-document basis. Consistent with Federal Rule of Civil Procedure 26(b)(5), the following information should be provided (as applicable) in the privilege log for each document: (1) Bates-number range, or if no Bates-number range, a unique document identification number; (2) document type; (3) family relationship; (4) document date; (5) all senders and recipients, including copyees and blind copyees, with attorneys and their staff denoted by an asterisk (*) on the log; (6) all custodians known to have been furnished the document; (7) privilege or protection claimed; and (8) description of the subject matter of the withheld Document or electronically stored information sufficient to enable the Requesting Party to assess the validity of the privilege claim.

iii. **Documents Redacted for Privilege.** Parties need not provide a log of documents redacted on the basis of privilege or another discovery protection so long as (1) the Party complies with the provisions of this ESI

Stipulation concerning redactions, including providing a metadata field that lists the basis of the redaction, and (2) the contents and metadata produced with the redacted document together contain all of the information that would otherwise be included on a privilege log.

iv. **Email Strings.** If the Producing Party is withholding any part of an email thread based on a claim of privilege or other protection, that party must produce all parts of the thread that are not privileged. Each withheld communication in an email string shall be separately logged as described above, including identifying all other documents in the same email string or document family by Bates number or privilege ID.

c. **Challenges to Privilege Log**

i. **General.** If a Requesting Party believes that one or more items in a Producing Party's privilege log should be produced, then it shall raise the issue as to each log entry or category of log entries with the Producing Party in writing with reasonably sufficient detail so that the Producing Party may understand the Requesting Party's position. The Producing Party shall respond in writing within 10 business days, unless otherwise agreed by the Parties. Agreement to reasonable requests for extension shall not be unreasonably withheld. If the response does not satisfy the Requesting Party, the Parties shall meet and confer and if the dispute as to the privileged nature of the material cannot be resolved, then the Requesting Party may seek relief from the Court, following the procedures of any applicable standing orders or rules.

d. **Rule 502(d)**

i. Pursuant to Fed. R. Evid. 502(d), the production of any documents in this proceeding shall not, for the purposes of this or any other federal or state proceeding, constitute a waiver by the Producing Party of any privilege applicable to those documents, including the attorney-client privilege,

attorney work-product protection, or any other privilege or protection recognized by law. Information produced in discovery that is protected as privileged or work product shall be immediately returned to the producing party and all physical and digital copies destroyed, and its production shall not constitute a waiver of such protection.

EXHIBIT A

Metadata Fields

A. Default Production Fields

The following default fields will be provided for all documents in the production.

Field Name	Description
Begin Bates	Beginning Bates Number of the Email, Application File, or Paper Document
End Bates	Ending Bates Number of the Email, Application File, or Paper Document
Begin/End Attachment	Bates Range for Full Family
Att Count	Number of attachments to an email
Parent/Child ID	Bates Number of either the Attachment (if Parent Email) of Parent Email (if Attachment)
Confidentiality	Field populated with the appropriate confidentiality designation for the Document.
Custodians	Multi-value field for custodians identified during collection. All documents should have a custodian value present. Multiple custodians should be separated by a ",". If multiple documents dedupe during processing, this field should be populated with all custodian values available.
Page Count	The number of pages in the Document.
Redacted	Field indicating whether the Document contains redactions and the basis for the redaction (*e.g.*, privileged, etc.).

B. Metadata Fields

The Parties will exchange the following metadata fields associated with email messages and non-email files (including email attachments) as indicated, except to the extent that information in the field reveals information that is privileged or otherwise protected against disclosure.

Field Name	Email or Non-Email	Description
Subject/Title	Email	Subject line of the email
File name	Non-Email	Name of the Application File
File Extension	Non-Email	File extension
Sent Date	Email	Email Sent date
Received Date	Email	Email Received date
Created Date	Non-Email	Date Application File was created.
Modified Date	Non-Email	Date Application File was last modified
Modified Time	Non-Email	Time Application File was last modified
Author/From	Both	Author of the Application File or sender of the Email
Recipient/To	Email	Recipients of the Email
Copyee	Email	CCs of the Email
BCC	Email	BCCs of the Email
File Type	Both	Email, Spreadsheet, Word Processing Document, etc.
File Path	Both	Location of the File Within the system
Path to Native	Both	Location of the File within the Production
Path to Text	Both	Location of the file within the Production
Document Type	Both	Type of file—Email, Attachment, or other file type
Email Sent Time	Email	Time Email was sent
Email Received Time	Email	Time Email was received

File Created Time	Non-Email	Time Application File was created
Native File Name	Non-Email	The file name of the native file as produced (e.g., TR000000001_Confidential.xls (in contrast to File Name, which is the original name of the file)
MD5 Hash	Non-mail	Value commonly used to de-duplicate files or identify duplicates

Dated: January 19, 2022 PERKINS COIE LLP

By: */s/ Susan D. Fahringer*
Susan D. Fahringer

Attorneys for Defendant
Thomson Reuters Corporation

Dated: January 19, 2022 GIBBS LAW GROUP LLP

By: */s/ Andre M. Mura*
Andre M. Mura

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

~~[PROPOSED]~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: January 21, 2022

Honorable Edward M. Chen
United States District Court

ECF ATTESTATION

I, Andre Mura, am the ECF User whose ID and password are being used to file this **ESI STIPULATION AND [PROPOSED] ORDER**. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that all signatories concur in the filing of this document.

Dated: January 19, 2022

GIBBS LAW GROUP LLP

By: */s/ Andre M. Mura*
Andre M. Mura

Attorneys for Plaintiffs