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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 AMEND CASE SCHEDULE AND [PROPOSED] ORDER

Judge: Hon. Edward M. Chen

Whereas, the Court entered a case schedule on August 26, 2022;

Whereas, Plaintiffs' lead counsel, Andre M. Mura, is serving as a juror in a trial in California Superior Court expected to run from February 28 to approximately March 25;

Whereas, Plaintiffs Cat Brooks and Rasheed Shabazz and Defendant Thomson Reuters Corporation, by and through their respective counsel, continue to work diligently through discovery issues in this complex case in advance of the class certification stage;

Whereas, the parties agree that an approximately 60-day extension of the case schedule is appropriate under the circumstances;

Whereas, the parties will not be prejudiced by the agreed-upon modification of the case schedule, and this is the first request to modify it; and

Whereas, the parties have prepared the following table summarizing the agreed-upon proposed changes to the case schedule:

Current schedule	Event	Proposed Amended Schedule
March 1, 2022	Disclosure of Primary Class Certification Experts	May 2, 2022
May 17, 2022	Disclosure of Class Certification Rebuttal Experts	August 8, 2022
June 17, 2022	Close of Class Certification Expert Discovery	September 8, 2022
June 28, 2022	Joint Status Report Due	No change proposed
July 1, 2022	Deadline to pursue private mediation	September 22, 2022
July 5, 2022	Status Conference, 2:30 pm	No change proposed

July 18, 2022	Deadline to Amend Pleadings and Plaintiffs' deadline to Move for Class Certification	October 10, 2022
July 18, 2022	Deadline for Plaintiff to File Class Certification Motion	October 10, 2022
September 12, 2022	Deadline for Opposition to Class Certification	December 15, 2022
October 24, 2022	Deadline for Plaintiffs' Reply Supporting Class Certification	January 26, 2023
December 8, 2022	Hearing on Motion for Class Certification	March 16, 2023, or such other date as the Court deems appropriate
February 8, 2023	Close of Fact Discovery	May 15, 2023
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 Trial Experts	No change proposed.
Defer setting this deadline until after a ruling on class certification.	Disclosure of Rebuttal Trial Experts	No change proposed.
Defer setting this deadline until after a ruling on class certification.	Close of Expert Discovery	No change proposed.
Defer setting this deadline until after a ruling on class certification.	Dispositive Motion Deadline	No change proposed.
Defer setting this deadline until after a ruling on class certification.	Pretrial conference	No change proposed.

Defer setting this deadline until after a ruling on class certification.	Trial	No change proposed.

IT IS HEREBY STIPULATED AND AGREED, subject to Court approval, that the case schedule shall be extended as reflected in the table above.

DATED: February 28, 2022

GIBBS LAW GROUP LLP

By: */s/ David Stein*

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DATED: February 28, 2022

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Thomson Reuters Corporation

[PROPOSED] ORDER

PURSUANT TO STIPULATION AND FOR GOOD CAUSE, 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/ *David Stein*