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[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 AMEND CASE SCHEDULE AND [PROPOSED] ORDER

Judge: Hon. Edward M. Chen

Whereas, the Court entered a case schedule on August 26, 2021, which was modified by agreement of the parties and with the Court's approval on March 1, 2022;

Whereas, the parties have been engaging in discovery and preparing for the May 2 deadline for class-certification expert disclosures, and Plaintiffs seek additional time to prepare those disclosures;

Whereas, the parties have conferred and agree that an approximately 30-day extension of the case schedule is appropriate in the interests of the case;

Whereas, the parties will not be prejudiced by this short extension of the case schedule; 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
May 2, 2022	Disclosure of Primary Class Certification Experts	June 1, 2022
August 8, 2022	Disclosure of Class Certification Rebuttal Experts	September 7, 2022
September 8, 2022	Close of Class Certification Expert Discovery	October 10, 2022
June 28, 2022	Joint Status Report Due	No change proposed
September 22, 2022	Deadline to pursue private mediation	October 24, 2022
July 5, 2022	Status Conference, 2:30 pm	No change proposed
October 10, 2022	Deadline to Amend Pleadings and Plaintiffs' deadline to Move for Class Certification	November 9, 2022
October 10, 2022	Deadline for Plaintiff to File Class Certification Motion	November 9, 2022

December 15, 2022	Deadline for Opposition to Class Certification	January 26, 2023
January 26, 2023	Deadline for Plaintiffs' Reply Supporting Class Certification	March 9, 2023
March 16, 2023, or such other date as the Court deems appropriate	Hearing on Motion for Class Certification	April 20, 2023, or such other date as the Court deems appropriate
May 15, 2023	Close of Fact Discovery	June 14, 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: March 31, 2022

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DATED: March 31, 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/ *Andre M. Mura*