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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

**PLAINTIFFS' REQUEST FOR ORAL
ARGUMENT REGARDING JOINT
DISCOVERY LETTER BRIEF (ECF
NO. 109)**

Judge: Hon. Kandis A. Westmore

1 Plaintiffs respectfully request that the Court hold oral argument on the pending discovery
 2 dispute. *See* ECF No. 109. Alternatively, Plaintiffs request leave to file a declaration of counsel
 3 Benjamin Elga of Justice Catalyst Law rebutting Defendant Thomson Reuters Corporation’s statement
 4 that Plaintiffs’ “own experts had used CLEAR for over a year[.]” ECF No. 109 at 3.

5 Plaintiffs provided Defendant with prior notice that they would communicate this request to the
 6 Court, and this request is being served on all parties via ECF. *See* Judge Westmore’s Standing Order ¶
 7 22. While Defendant suggested in response that Plaintiffs could seek to correct the record at a hearing
 8 on the discovery dispute, the Court has not set a hearing and may decline to hold one.

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 10 Dated: September 30, 2022

Respectfully submitted,

/s/ Andre M. Mura

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