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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

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

Plaintiff,

v.

THOMSON REUTERS CORPORATION,

Defendants.

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

DECLARATION OF SUSAN D. FAHRINGER IN SUPPORT OF DEFENDANT THOMSON REUTERS CORPORATION'S OPPOSITION TO PLAINTIFFS' RULE 16(B)(4) MOTION TO MODIFY CASE SCHEDULE

Hon. Edward M. Chen

I, Susan D. Fahringer, declare as follows:

1. I am a partner with Perkins Coie LLC and am one of the attorneys for Defendant Thomson Reuters Corporation ("Thomson Reuters") in this case. I make this Declaration based on my personal knowledge and am competent to testify to its contents.

2. Attached as **Exhibit A** is a summary table setting forth the history of case schedule extensions in this case (Dkts. ## 59 and 78), along with the extension Plaintiffs currently seek (Dkt. # 113-3), with respect to the deadlines to move for class certification, to amend the complaint, and for discovery.

3. Attached as **Exhibit B** is an email exchange between Andre Mura, counsel for Plaintiffs, and myself, dated October 3 through October 6, 2022, discussing Thomson Reuters' questions and response to the extension Plaintiffs now seek. Following the email exchange, I spoke by phone with Andre Mura and Zeke Wald, counsel for Plaintiffs. During that call, counsel for Plaintiffs would not discuss a briefing schedule for potential *Daubert* motions unless Thomson Reuters also agreed to extend the deadlines to amend the Complaint and to move for class certification. The parties have not meaningfully conferred on an appropriate briefing schedule for *Daubert* motions.

4. Plaintiffs' counsel Jennifer Bennett has not participated in any discovery conference, deposition, email exchange, or hearing in this case to date.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 11th day of October, 2022, in Seattle, Washington.

By: s/ *Susan D. Fahringer*
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Attorney for Defendants
Thomson Reuters Corporation