Eric H. Gibbs (SBN 178658)
Andre M. Mura (SBN 298541)
Amy M. Zeman (SBN 273100)
Ezekiel S. Wald (SBN 341490)
GIBBS LAW GROUP LLP
1111 Broadway, Suite 2100
Oakland, California 94607
Telephone: (510) 350-9700
Facsimile: (510) 350-9701
ehg@classlawgroup.com
amm@classlawgroup.com
amz@classlawgroup.com
zsw@classlawgroup.com

Attorneys for Plaintiffs and the Proposed Class

[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-KAW

STIPULATION SETTING *DAUBERT* SCHEDULE AND ~~[PROPOSED]~~ ORDER

Judge: Hon. Edward M. Chen

Whereas, the Court ordered the parties to meet and confer regarding a briefing schedule for any *Daubert* motions to be filed in connection with Plaintiffs' anticipated Motion for Class Certification, and jointly propose a stipulated schedule, or the parties respective positions, by November 3, 2022;

Whereas, the parties have met and agreed to the following schedule for such *Daubert* briefing:

- Deadline for any *Daubert* motions/motions to strike related to class certification: February 6, 2023;
- Deadline for Opposition to *Daubert* motions/motions to strike: March 6, 2023;
- Deadline for Replies Supporting *Daubert* motions/motions to strike: March 20, 2023.

IT IS HEREBY STIPULATED AND AGREED, subject to Court approval, that the parties' briefing schedule for any *Daubert* motions related to Plaintiffs' anticipated motion for class certification shall be as set forth above.

DATED: November 2, 2022

GIBBS LAW GROUP LLP

By: */s/ Andre M. Mura*

Eric H. Gibbs
Andre M. Mura
Amy M. Zeman
Ezekiel S. Wald
1111 Broadway, Suite 2100
Oakland, California 94607
Telephone: (510) 350-9700
Fax: (510) 350-9701
ehg@classlawgroup.com
amm@classlawgroup.com
amz@classlawgroup.com
zsw@classlawgroup.com

Jennifer D. Bennett
Neil K. Sawhney
GUPTA WESSLER PLLC
100 Pine Street, Suite 1250
San Francisco, CA 94111
Telephone: (415) 573-0336
jennifer@guptawessler.com
neil@guptawessler.com

Albert Fox Cahn (pro hac vice)
SURVEILLANCE TECHNOLOGY OVERSIGHT PROJECT
40 Rector Street, 9th Floor
New York, NY 10006
albert@stopspying.org

Benjamin Elga (pro hac vice)
JUSTICE CATALYST LAW INC.
123 William Street, 16th Floor
New York, NY 10038
Telephone: (518) 732-6703
belga@justicecatalyst.org

Attorneys for Plaintiffs

DATED: November 2, 2022

PERKINS COIE LLP

By: */s/ Susan D. Fahringer*

Susan D. Fahringer, Bar No. 21567
Nicola C. Menaldo (pro hac vice)
Anna M. Thompson (pro hac vice)
1201 Third Avenue, Suite 4900
Seattle, WA 98101-3099
Telephone: (206) 359-8000
Facsimile: (206) 359-9000
SFahringer@perkinscoie.com
NMenaldo@perkinscoie.com
AnnaThompson@perkinscoie.com

Gabriella Gallego, Bar No. 324226
PERKINS COIE LLP
3150 Porter Drive
Palo Alto, CA 94304-1212
Telephone: (650) 838-4300
Facsimile: (650) 838-4350
GGallego@perkinscoie.com

Attorneys for Defendant
Thomson Reuters Corporation

~~[PROPOSED]~~ ORDER

PURSUANT TO STIPULATION AND FOR GOOD CAUSE, IT IS SO ORDERED.

DATED: November 2, 2022

EDWARD M. CHEN
United States District Judge