

Eric H. Gibbs (SBN 178658)
Andre M. Mura (SBN 298541)
Amy M. Zeman (SBN 273100)
Mark H. Troutman (*pro hac vice*)
Ezekiel S. Wald (SBN 341490)
Hanne Jensen (SBN 336045)
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
mht@classlawgroup.com
zsw@classlawgroup.com
hj@classlawgroup.com

Geoffrey A. Graber (SBN 211547)
Karina G. Puttieva (SBN 317702)
**COHEN MILSTEIN SELLERS & TOLL
PLLC**
1100 New York Ave. NW, Fifth Floor
Washington, DC 20005
Telephone: (202) 408-4600
Facsimile: (202) 408-4699
ggraber@cohenmilstein.com
kputtieva@cohenmilstein.com

Attorneys for Plaintiffs and the Proposed Class

**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-01418-EMC-KAW

**DECLARATION OF ANDRE M. MURA IN
SUPPORT OF PLAINTIFFS' MOTION FOR
LEAVE TO AMEND**

1 I, Andre Mura, declare under penalty of perjury:

2 1. I am a member in good standing of the Bar of California and the bar of this
3 Court. I am a partner at Gibbs Law Group LLP in Oakland, California, and represent
4 Plaintiffs in this matter. Plaintiffs respectfully request leave to file an amended complaint. I
5 offer this declaration in support of Plaintiffs' motion.

6 2. On the evening of Sunday, November 6, 2022, Plaintiffs' counsel sent Thomson
7 Reuters' counsel a letter seeking their written consent to file the proposed amended
8 complaint, pursuant to Rule 15(a)(2). Plaintiffs attached a redline version of a working draft of
9 proposed amended complaint showing the proposed changes from the original complaint.
10 The letter requested a response by noon on Tuesday, November 8, 2022.

11 3. On the afternoon of Tuesday, November 8, I asked counsel for Thomson
12 Reuters, Ms. Fahringer, via email for Defendant's position. Counsel responded that Thomson
13 Reuters was still digesting Plaintiffs' proposed changes and may not have an answer before
14 the filing deadline of Wednesday, November 8. In response, I asked counsel for Thomson
15 Reuters that if it is able to state its final position by 4:00 pm PT on Wednesday, November 9,
16 to please do so. Thomson Reuters did not provide any further response.

17 I declare under penalty of perjury that the foregoing is true and correct. Executed on
18 November 9, 2022.

19
20 /s/ Andre M. Mura
21 Andre M. Mura
22
23
24
25
26
27
28