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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-01418-EMC-KAW

**PLAINTIFFS' ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIALS
SHOULD BE SEALED**

Hon. Edward M. Chen

**PLAINTIFFS' ADMINISTRATIVE MOTION TO CONSIDER WHETHER ANOTHER
PARTY'S MATERIALS SHOULD BE SEALED**

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

Pursuant to Civil Local Rule 79-5(f) and the Stipulated Protective Order entered by the Court on December 17, 2021 (ECF No. 70), Plaintiffs request that the Court consider whether material designated as "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY" should be filed under seal. Specifically, Defendant has designated as "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY" the following exhibits to Andre M. Mura's Declaration in Support of Plaintiffs' Motion for Class Certification:

Exhibit to Mura Declaration	Document	Provisionally Sealed Portion(s)	Evidence Offered in Support of Sealing
Ex. 1	Fox Deposition	32:20-33:3; 35:16-37:23; 38:15-24; 50:10-15; 60:21-61:14; 62:21-25; 69:8-16; 95:3-96:19; 98:19-99:20; 102:25-103:5; 104:13-107:17; 108:15-110:17; 121:15-122:4; 122:21-25; 123:5-123:12; 150:2-9, 156:11-157:4; 169:21-170:4; 178:2-24; 189:16-23	Defendant to provide evidence per Local Rule 79-5(f)
Ex. 2	TR-BROOKS026283-TR-BROOKS026284	Entire document	Defendant to provide evidence per Local Rule 79-5(f)
Ex. 3	TR-BROOKS023888	Entire document	Defendant to provide evidence per Local Rule 79-5(f)
Ex. 4	Turow Report	Entire document	Defendant to provide evidence per Local Rule 79-5(f)
Ex. 5	Buckethal Deposition	23:19-25; 32:13-23	Defendant to provide evidence per Local Rule 79-5(f)

Exhibit to Mura Declaration	Document	Provisionally Sealed Portion(s)	Evidence Offered in Support of Sealing
Ex. 6	Godlewski Deposition	33:4-7; 151:22-152:24; 163:15-21; 164:10-12; 172:22-173:5; 191:10-13; 220:1-20	Defendant to provide evidence per Local Rule 79-5(f)
Ex. 7	Defendant's Responses to Plaintiffs' First Set of Interrogatories	Attachment A (pp. 14-21)	Defendant to provide evidence per Local Rule 79-5(f)
Ex. 8	TR-BROOKS052568	Entire spreadsheet	Defendant to provide evidence per Local Rule 79-5(f)
Ex. 9	TR-BROOKS426763	Entire spreadsheet	Defendant to provide evidence per Local Rule 79-5(f)
Ex. 12	TR-BROOKS020865-TR-BROOKS020890	Entire document	Defendant to provide evidence per Local Rule 79-5(f)
Ex. 15	TR-BROOKS020567	Entire document	Defendant to provide evidence per Local Rule 79-5(f)
Ex. 16	TR-BROOKS101145-TR-BROOKS101149	Entire document	Defendant to provide evidence per Local Rule 79-5(f)
Ex. 17	TR-BROOKS013854	Entire document	Defendant to provide evidence per Local Rule 79-5(f)
Ex. 19	TR-BROOKS072634-TR-BROOKS072636	Entire document	Defendant to provide evidence per Local Rule 79-5(f)
Ex. 20	TR-BROOKS020290-TR-BROOKS020293	Entire document	Defendant to provide evidence per Local Rule 79-5(f)
Ex. 21	TR-BROOKS332920	Entire spreadsheet	Defendant to provide evidence per Local Rule 79-5(f)
Ex. 23	TR-BROOKS284900-TR-BROOKS284905	Entire document	Defendant to provide evidence per Local Rule 79-5(f)

Exhibit to Mura Declaration	Document	Provisionally Sealed Portion(s)	Evidence Offered in Support of Sealing
Ex. 24	TR-BROOKS422796	Entire spreadsheet	Defendant to provide evidence per Local Rule 79-5(f)
Ex. 25	TR-BROOKS060012-TR- BROOKS060013	Entire document	Defendant to provide evidence per Local Rule 79-5(f)
Ex. 26	TR-BROOKS020178	Entire spreadsheet	Defendant to provide evidence per Local Rule 79-5(f)
Ex. 27	TR-BROOKS060007-TR- BROOKS060008	Entire document	Defendant to provide evidence per Local Rule 79-5(f)
Ex. 28	TR-BROOKS225965	Entire document	Defendant to provide evidence per Local Rule 79-5(f)
Ex. 29	TR-BROOKS383370-TR- BROOKS383372	Entire document	Defendant to provide evidence per Local Rule 79-5(f)
Ex. 30	TR-BROOKS020176-TR- BROOKS020177	Entire document	Defendant to provide evidence per Local Rule 79-5(f)
Ex. 31	TR-BROOKS316008-TR- BROOKS316036	Entire document	Defendant to provide evidence per Local Rule 79-5(f)
Ex. 32	TR-BROOKS135830-TR- BROOKS135836	Entire document	Defendant to provide evidence per Local Rule 79-5(f)
Ex. 33	TR-BROOKS317004-TR- BROOKS317006	Entire document	Defendant to provide evidence per Local Rule 79-5(f)
Ex. 34	TR-BROOKS418771-TR- BROOKS418776	Entire document	Defendant to provide evidence per Local Rule 79-5(f)
Ex. 35	TR-BROOKS028621-TR- BROOKS028622	Entire document	Defendant to provide evidence per Local Rule 79-5(f)
Ex. 36	TR-BROOKS024022-TR- BROOKS024023	Entire document	Defendant to provide evidence per Local Rule 79-5(f)

Exhibit to Mura Declaration	Document	Provisionally Sealed Portion(s)	Evidence Offered in Support of Sealing
Ex. 37	TR-BROOKS079617	Entire document	Defendant to provide evidence per Local Rule 79-5(f)
Ex. 38	TR-BROOKS040077-TR- BROOKS040089	Entire document	Defendant to provide evidence per Local Rule 79-5(f)
Ex. 39	TR-BROOKS138062-TR- BROOKS138064	Entire document	Defendant to provide evidence per Local Rule 79-5(f)
Ex. 41	TR-BROOKS280153-TR- BROOKS280161	Entire document	Defendant to provide evidence per Local Rule 79-5(f)
Ex. 42	TR-BROOKS296841-TR- BROOKS296863	Entire document	Defendant to provide evidence per Local Rule 79-5(f)
Ex. 43	TR-BROOKS020396	Entire document	Defendant to provide evidence per Local Rule 79-5(f)
Ex. 44	TR-BROOKS274854-TR- BROOKS274861	Entire document	Defendant to provide evidence per Local Rule 79-5(f)
Ex. 45	TR-BROOKS408706-TR- BROOKS408712	Entire document	Defendant to provide evidence per Local Rule 79-5(f)
Ex. 46	TR-BROOKS013613-TR- BROOKS013615	Entire document	Defendant to provide evidence per Local Rule 79-5(f)
Ex. 47	TR-BROOKS297996-TR- BROOKS298005	Entire document	Defendant to provide evidence per Local Rule 79-5(f)
Ex. 48	TR-BROOKS273025-TR- BROOKS273031	Entire document	Defendant to provide evidence per Local Rule 79-5(f)
Ex. 49	TR-BROOKS044835-TR- BROOKS044837	Entire document	Defendant to provide evidence per Local Rule 79-5(f)
Ex. 50	TR-BROOKS171366-TR- BROOKS171367	Entire document	Defendant to provide evidence per Local Rule 79-5(f)

Exhibit to Mura Declaration	Document	Provisionally Sealed Portion(s)	Evidence Offered in Support of Sealing
Ex. 51	TR-BROOKS018865-TR-BROOKS018867	Entire document	Defendant to provide evidence per Local Rule 79-5(f)
Ex. 52	TR-BROOKS019226-TR-BROOKS019228	Entire document	Defendant to provide evidence per Local Rule 79-5(f)
Ex. 53	TR-BROOKS418877-TR-BROOKS418881	Entire document	Defendant to provide evidence per Local Rule 79-5(f)
Ex. 54	TR-BROOKS253461	Entire document	Defendant to provide evidence per Local Rule 79-5(f)
Ex. 55	TR-BROOKS175246-TR-BROOKS175249	Entire document	Defendant to provide evidence per Local Rule 79-5(f)
Ex. 56	TR-BROOKS251168- TR-BROOKS251170	Entire document	Defendant to provide evidence per Local Rule 79-5(f)
Ex. 57	TR-BROOKS189667	Entire document	Defendant to provide evidence per Local Rule 79-5(f)
Ex. 58	TR-BROOKS062991-TR-BROOKS062998	Entire document	Defendant to provide evidence per Local Rule 79-5(f)
Ex. 59	FSG Report	Entire document	Defendant to provide evidence per Local Rule 79-5(f)
Ex. 60	Thomson Reuters' First Supplemental Answer to Plaintiffs' First Set of Interrogatories	Entire document	Defendant to provide evidence per Local Rule 79-5(f)
Ex. 61	TR-BROOKS123263-TR-BROOKS123277	Entire document	Defendant to provide evidence per Local Rule 79-5(f)
Ex. 62	TR-BROOKS311495	Entire document	Defendant to provide evidence per Local Rule 79-5(f)

Exhibit to Mura Declaration	Document	Provisionally Sealed Portion(s)	Evidence Offered in Support of Sealing
Ex. 67	TR-BROOKS027757-TR-BROOKS027761	Entire document	Defendant to provide evidence per Local Rule 79-5(f)
Ex. 70	TR-BROOKS017559	Entire spreadsheet	Defendant to provide evidence per Local Rule 79-5(f)
Ex. 71	TR-BROOKS332968	Entire document	Defendant to provide evidence per Local Rule 79-5(f)
Ex. 72	TR-BROOKS332921-TR-BROOKS332967	Entire document	Defendant to provide evidence per Local Rule 79-5(f)
Ex. 73	TR-BROOKS005220-TR-BROOKS008254	Entire document	Defendant to provide evidence per Local Rule 79-5(f). Separately, Plaintiffs agree that this entire document should be sealed, as it contains personal information, including sensitive personal information, of the named Plaintiff Cat Brooks.
Ex. 74	TR-BROOKS008353-TR-BROOKS008718	Entire document	Defendant to provide evidence per Local Rule 79-5(f) Separately, Plaintiffs agree that this entire document should be sealed, as it contains personal information, including sensitive personal information, of the named Plaintiff Rasheed Shabazz.

The following portions of Plaintiffs' Motion for Class Certification quote from or otherwise refer to the above exhibits and so may also be potentially considered confidential by Defendant:

Provisionally Sealed Portion of Motion	Evidence Offered in Support of Sealing
Page 1, line 4 (between "about" and end of sentence)	Def. to provide evidence per L.R. 79-5(f)
Page 1, line 9 (first full sentence)	Def. to provide evidence per L.R. 79-5(f)
Page 1, lines 10-11 (between "including" and "of dollars")	Def. to provide evidence per L.R. 79-5(f)
Page 1, lines 15-16 (between "In fact," and "let alone")	Def. to provide evidence per L.R. 79-5(f)
Page 1, line 19 (between "including" and end of sentence)	Def. to provide evidence per L.R. 79-5(f)
Page 1, line 22 (between "is" and end of sentence)	Def. to provide evidence per L.R. 79-5(f)
Page 2, line 16 (between "a" and "for")	Def. to provide evidence per L.R. 79-5(f)
Page 2, line 17 (between "on" and "Californians")	Def. to provide evidence per L.R. 79-5(f)
Page 2, lines 19-22 (entire sentence)	Def. to provide evidence per L.R. 79-5(f)
Page 3, lines 1-2 (between "purposes:" and "have all bought access to CLEAR")	Def. to provide evidence per L.R. 79-5(f)
Page 3, lines 4-5 (between "Californians" and "and none")	Def. to provide evidence per L.R. 79-5(f)
Page 3, line 12 (entire sentence)	Def. to provide evidence per L.R. 79-5(f)
Page 3, lines 14-15 (between "a" and "that may be available.")	Def. to provide evidence per L.R. 79-5(f)
Page 3, lines 17-18 (between "information" and "live cell phone")	Def. to provide evidence per L.R. 79-5(f)
Page 3, lines 19-20 (between "facilities," and "professional")	Def. to provide evidence per L.R. 79-5(f)
Page 3, line 20 (between "professional" and "licenses")	Def. to provide evidence per L.R. 79-5(f)
Page 3, lines 21-23 (between "licenses" and "arrest records")	Def. to provide evidence per L.R. 79-5(f)
Page 3, lines 23-24 (between "arrest records," and "and more.")	Def. to provide evidence per L.R. 79-5(f)
Page 3, line 26 (between "from" and "to")	Def. to provide evidence per L.R. 79-5(f)
Page 3, lines 26-27 (between "to" and end of sentence)	Def. to provide evidence per L.R. 79-5(f)

Provisionally Sealed Portion of Motion	Evidence Offered in Support of Sealing
Page 3, lines 27-28 (between "that" and "is available")	Def. to provide evidence per L.R. 79-5(f)
Page 4, lines 3-5 (entire sentence)	Def. to provide evidence per L.R. 79-5(f)
Page 4, lines 8-9 (between "otherwise" and end of sentence)	Def. to provide evidence per L.R. 79-5(f)
Page 4, lines 10-14 (between "access to" and end of sentence)	Def. to provide evidence per L.R. 79-5(f)
Page 4, lines 16-17 (entire sentence)	Def. to provide evidence per L.R. 79-5(f)
Page 4, lines 17-20 (between "(CLEAR RTIA Spreadsheet)" and "See, e.g., id.")	Def. to provide evidence per L.R. 79-5(f)
Page 4, line 23 (between "through" and "third parties")	Def. to provide evidence per L.R. 79-5(f)
Page 4, lines 23-24 (between "everyone from" and end of sentence)	Def. to provide evidence per L.R. 79-5(f)
Page 4, lines 26-27 (entire sentence)	Def. to provide evidence per L.R. 79-5(f)
Page 4, line 28 (entire sentence)	Def. to provide evidence per L.R. 79-5(f)
Page 5, line 2 (between "at once –" and end of sentence)	Def. to provide evidence per L.R. 79-5(f)
Page 5, lines 4-5 (between "search function" and end of sentence)	Def. to provide evidence per L.R. 79-5(f)
Page 5, line 7 (between beginning of sentence and "which")	Def. to provide evidence per L.R. 79-5(f)
Page 5, lines 7-8 (between "gathers" and "from the third parties")	Def. to provide evidence per L.R. 79-5(f)
Page 5, lines 8-10 (entire sentence)	Def. to provide evidence per L.R. 79-5(f)
Page 5 lines 12-13 (between "it is" and end of citation parenthetical)	Def. to provide evidence per L.R. 79-5(f)
Page 5, line 15 (between "its" and "and patented")	Def. to provide evidence per L.R. 79-5(f)
Page 5, line 15 (between "database" and "which associates")	Def. to provide evidence per L.R. 79-5(f)
Page 5, lines 23.5-24 (entire citation parenthetical)	Def. to provide evidence per L.R. 79-5(f)
Page 5, line 25 (entire citation parenthetical)	Def. to provide evidence per L.R. 79-5(f)
Page 5, lines 25-27.5 (entire citation parenthetical)	Def. to provide evidence per L.R. 79-5(f)
Page 6, line 3 (between "by its" and "CLEAR customers")	Def. to provide evidence per L.R. 79-5(f)
Page 6, line 5 (between "claims to restrict" and "cherry-picking")	Def. to provide evidence per L.R. 79-5(f)

Provisionally Sealed Portion of Motion	Evidence Offered in Support of Sealing
Page 6, line 6 (between "terms" and end of sentence)	Def. to provide evidence per L.R. 79-5(f)
Page 6, line 7 (between "But" and "is not")	Def. to provide evidence per L.R. 79-5(f)
Page 6, lines 8-10 (between "by" and end of sentence)	Def. to provide evidence per L.R. 79-5(f)
Page 6, lines 11-12 (entire sentence)	Def. to provide evidence per L.R. 79-5(f)
Page 6, line 13 (between "considered" and end of sentence)	Def. to provide evidence per L.R. 79-5(f)
Page 6, lines 14-15 (between "that they" and end of parenthetical)	Def. to provide evidence per L.R. 79-5(f)
Page 6, lines 16-17 (between "discussing" and end of parenthetical)	Def. to provide evidence per L.R. 79-5(f)
Page 6, lines 20-21 (between "information" and end of sentence)	Def. to provide evidence per L.R. 79-5(f)
Page 6, lines 22.5-23 (entire citation parenthetical)	Def. to provide evidence per L.R. 79-5(f)
Page 6, lines 23.5-25 (entire citation parenthetical)	Def. to provide evidence per L.R. 79-5(f)
Page 6, lines 25.5-26 (entire citation parenthetical)	Def. to provide evidence per L.R. 79-5(f)
Page 6, lines 26-27.5 (entire citation parenthetical)	Def. to provide evidence per L.R. 79-5(f)
Page 6, line 28 (entire citation parenthetical)	Def. to provide evidence per L.R. 79-5(f)
Page 7, lines 1-2 (between "discussing" and end of citation parenthetical)	Def. to provide evidence per L.R. 79-5(f)
Page 7, lines 3-6 (entire citation parenthetical)	Def. to provide evidence per L.R. 79-5(f)
Page 7, lines 7-10 (between "found" and end of citation parenthetical)	Def. to provide evidence per L.R. 79-5(f)
Page 7, line 11 (between "generates" and "from selling")	Def. to provide evidence per L.R. 79-5(f)
Page 7, line 13 (between "over" and "selling")	Def. to provide evidence per L.R. 79-5(f)
Page 7, lines 13-14 (between "access to" and end of sentence)	Def. to provide evidence per L.R. 79-5(f)
Page 7, line 16 (between "developed" and "CLEAR")	Def. to provide evidence per L.R. 79-5(f)
Page 7, lines 17-18 (between "only" and end of sentence)	Def. to provide evidence per L.R. 79-5(f)

Provisionally Sealed Portion of Motion	Evidence Offered in Support of Sealing
Page 7, lines 19-20 (between "from" and end of sentence)	Def. to provide evidence per L.R. 79-5(f)
Page 7, lines 21-24 (between "include" and "and more.")	Def. to provide evidence per L.R. 79-5(f)
Page 7, lines 25-26 (between "purpose:" and end of sentence)	Def. to provide evidence per L.R. 79-5(f)
Page 7, line 27 (between "CLEAR" and end of sentence)	Def. to provide evidence per L.R. 79-5(f)
Page 8, line 1 (between "CLEAR" and end of sentence)	Def. to provide evidence per L.R. 79-5(f)
Page 8, lines 6-7 (between "Californians" and end of sentence)	Def. to provide evidence per L.R. 79-5(f)
Page 8, lines 8-10 (between "for example," and end of sentence)	Def. to provide evidence per L.R. 79-5(f)
Page 8, lines 11-12 (between "part," and end of sentence)	Def. to provide evidence per L.R. 79-5(f)
Page 9, lines 7-11 (between "Thomson Reuters" and end of sentence)	Def. to provide evidence per L.R. 79-5(f)
Page 11, lines 11-12 (between "information on" and end of sentence)	Def. to provide evidence per L.R. 79-5(f)
Page 17, lines 22-23 (entire sentence)	Def. to provide evidence per L.R. 79-5(f)
Page 18, lines 27.5-28 (entire citation parenthetical)	Def. to provide evidence per L.R. 79-5(f)
Page 21, line 18 (between "class members" and "and would therefore")	Def. to provide evidence per L.R. 79-5(f)

Pursuant to Local Rule 79-5(f)(3), Defendant, as the Designating Party, bears the responsibility to establish that its designated materials are sealable. Plaintiffs provisionally file these documents under seal to give Defendant an opportunity to specify any reasons for keeping the documents under seal pursuant to Local Rule 79-5(c).

DATED: November 9, 2022

Respectfully submitted,

/s/ Andre M. Mura

Andre M. Mura

Eric H. Gibbs (SBN 178658)

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2 Amy M. Zeman (SBN 273100)
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