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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

**DECLARATION OF ANDRE M. MURA IN
SUPPORT OF PLAINTIFFS'
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIALS SHOULD BE
SEALED**

Hon. Edward M. Chen

DECLARATION OF ANDRE M. MURA ISO PLAINTIFFS' ADMINISTRATIVE MOTION
TO CONSIDER WHETHER ANOTHER PARTY'S MATERIALS SHOULD BE SEALED

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

I, Andre M. Mura, declare under penalty of perjury:

1. I am a member in good standing of the Bar of California and the bar of this Court. I am a partner at Gibbs Law Group LLP in Oakland, California, and represent Plaintiffs in this matter.

2. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently to them.

3. I submit this declaration in support of Plaintiffs' Administrative Motion to Consider Whether Another Party's Material Should Be Sealed.

4. Pursuant to Local Rule 79-5(f), I hereby state that the following documents, which are exhibits to the Declaration of Andre M. Mura in Support of Plaintiffs' Motion for Class Certification ("Motion"), have been designated as "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY" by Defendant under the operative Stipulated Protective Order in this action. *See* ECF No. 70:

Exhibit to Mura Declaration in Support of Plaintiffs' Motion	Portion Designated as "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY" by Defendant
Ex. 1	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
Ex. 2	Entire document
Ex. 3	Entire document
Ex. 4	Entire document
Ex. 5	23:19-25; 32:13-23
Ex. 6	33:4-7; 151:22-152:24; 163:15-21; 164:10-12; 172:22-173:5; 191:10-13; 220:1-20
Ex. 7	Attachment A (pp. 14-21)
Ex. 8	Entire spreadsheet
Ex. 9	Entire spreadsheet
Ex. 12	Entire document

Exhibit to Mura Declaration in Support of Plaintiffs' Motion	Portion Designated as "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY" by Defendant
Ex. 15	Entire document
Ex. 16	Entire document
Ex. 17	Entire document
Ex. 19	Entire document
Ex. 20	Entire document
Ex. 21	Entire spreadsheet
Ex. 23	Entire document
Ex. 24	Entire spreadsheet
Ex. 25	Entire document
Ex. 26	Entire spreadsheet
Ex. 27	Entire document
Ex. 28	Entire document
Ex. 29	Entire document
Ex. 30	Entire document
Ex. 31	Entire document
Ex. 32	Entire document
Ex. 33	Entire document
Ex. 34	Entire document
Ex. 35	Entire document
Ex. 36	Entire document
Ex. 37	Entire document
Ex. 38	Entire document
Ex. 39	Entire document
Ex. 41	Entire document
Ex. 42	Entire document

Exhibit to Mura Declaration in Support of Plaintiffs' Motion	Portion Designated as "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY" by Defendant
Ex. 43	Entire document
Ex. 44	Entire document
Ex. 45	Entire document
Ex. 46	Entire document
Ex. 47	Entire document
Ex. 48	Entire document
Ex. 49	Entire document
Ex. 50	Entire document
Ex. 51	Entire document
Ex. 52	Entire document
Ex. 53	Entire document
Ex. 54	Entire document
Ex. 55	Entire document
Ex. 56	Entire document
Ex. 57	Entire document
Ex. 58	Entire document
Ex. 59	Entire document
Ex. 60	Entire document
Ex. 61	Entire document
Ex. 62	Entire document
Ex. 67	Entire document
Ex. 70	Entire spreadsheet
Ex. 71	Entire document
Ex. 72	Entire document
Ex. 73	Entire document. Separately, Plaintiffs agree that this entire document should be sealed, as it

Exhibit to Mura Declaration in Support of Plaintiffs' Motion	Portion Designated as "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY" by Defendant
	contains personal information, including sensitive personal information, of the named Plaintiff Cat Brooks.
Ex. 74	Entire document. 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.

5. The following portions of Plaintiffs' Motion for Class Certification quote from or otherwise refer to the exhibits referenced in Paragraph 4 above and so may also be potentially considered confidential by Defendant:

Portion of Plaintiffs' Motion for Class Certification
Page 1, line 4 (between "about" and end of sentence)
Page 1, line 9 (first full sentence)
Page 1, lines 10-11 (between "including" and "of dollars")
Page 1, lines 15-16 (between "In fact," and "let alone")
Page 1, line 19 (between "including" and end of sentence)
Page 1, line 22 (between "is" and end of sentence)
Page 2, line 16 (between "a" and "for")
Page 2, line 17 (between "on" and "Californians")
Page 2, lines 19-22 (entire sentence)
Page 3, lines 1-2 (between "purposes:" and "have all bought access to CLEAR")
Page 3, lines 4-5 (between "Californians" and "and none")
Page 3, line 12 (entire sentence)
Page 3, lines 14-15 (between "a" and "that may be available.")
Page 3, lines 17-18 (between "information" and "live cell phone")
Page 3, lines 19-20 (between "facilities," and "professional")

Portion of Plaintiffs' Motion for Class Certification
Page 3, line 20 (between "professional" and "licenses")
Page 3, lines 21-23 (between "licenses" and "arrest records")
Page 3, lines 23-24 (between "arrest records," and "and more.")
Page 3, line 26 (between "from" and "to")
Page 3, lines 26-27 (between "to" and end of sentence)
Page 3, lines 27-28 (between "that" and "is available")
Page 4, lines 3-5 (entire sentence)
Page 4, lines 8-9 (between "otherwise" and end of sentence)
Page 4, lines 10-14 (between "access to" and end of sentence)
Page 4, lines 16-17 (entire sentence)
Page 4, lines 17-20 (between "(CLEAR RTIA Spreadsheet)" and "See, e.g., id.")
Page 4, line 23 (between "through" and "third parties")
Page 4, lines 23-24 (between "everyone from" and end of sentence)
Page 4, lines 26-27 (entire sentence)
Page 4, line 28 (entire sentence)
Page 5, line 2 (between "at once – " and end of sentence)
Page 5, lines 4-5 (between "search function" and end of sentence)
Page 5, line 7 (between beginning of sentence and "which")
Page 5, lines 7-8 (between "gathers" and "from the third parties")
Page 5, lines 8-10 (entire sentence)
Page 5 lines 12-13 (between "it is" and end of citation parenthetical)
Page 5, line 15 (between "its" and "and patented")
Page 5, line 15 (between "database" and "which associates")
Page 5, lines 23.5-24 (entire citation parenthetical)
Page 5, line 25 (entire citation parenthetical)
Page 5, lines 25-27.5 (entire citation parenthetical)

Portion of Plaintiffs' Motion for Class Certification
Page 6, line 3 (between "by its" and "CLEAR customers")
Page 6, line 5 (between "claims to restrict" and "cherry-picking")
Page 6, line 6 (between "terms" and end of sentence)
Page 6, line 7 (between "But" and "is not")
Page 6, lines 8-10 (between "by" and end of sentence)
Page 6, lines 11-12 (entire sentence)
Page 6, line 13 (between "considered" and end of sentence)
Page 6, lines 14-15 (between "that they" and end of parenthetical)
Page 6, lines 16-17 (between "discussing" and end of parenthetical)
Page 6, lines 20-21 (between "information" and end of sentence)
Page 6, lines 22.5-23 (entire citation parenthetical)
Page 6, lines 23.5-25 (entire citation parenthetical)
Page 6, lines 25.5-26 (entire citation parenthetical)
Page 6, lines 26-27.5 (entire citation parenthetical)
Page 6, line 28 (entire citation parenthetical)
Page 7, lines 1-2 (between "discussing" and end of citation parenthetical)
Page 7, lines 3-6 (entire citation parenthetical)
Page 7, lines 7-10 (between "found" and end of citation parenthetical)
Page 7, line 11 (between "generates" and "from selling")
Page 7, line 13 (between "over" and "selling")
Page 7, lines 13-14 (between "access to" and end of sentence)
Page 7, line 16 (between "developed" and "CLEAR")
Page 7, lines 17-18 (between "only" and end of sentence)
Page 7, lines 19-20 (between "from" and end of sentence)
Page 7, lines 21-24 (between "include" and "and more.")
Page 7, lines 25-26 (between "purpose:" and end of sentence)

Portion of Plaintiffs' Motion for Class Certification
Page 7, line 27 (between "CLEAR" and end of sentence)
Page 8, line 1 (between "CLEAR" and end of sentence)
Page 8, lines 6-7 (between "Californians" and end of sentence)
Page 8, lines 8-10 (between "for example," and end of sentence)
Page 8, lines 11-12 (between "part," and end of sentence)
Page 9, lines 7-11 (between "Thomson Reuters" and end of sentence)
Page 11, lines 11-12 (between "information on" and end of sentence)
Page 17, lines 22-23 (entire sentence)
Page 18, lines 27.5-28 (entire citation parenthetical)
Page 21, line 18 (between "class members" and "and would therefore")

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

/s/ Andre M. Mura

Andre M. Mura