

EXHIBIT 13

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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,

Plaintiffs,

v.

THOMSON REUTERS
CORPORATION,

Defendant.

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

**DEFENDANT THOMSON REUTERS
CORPORATION'S ANSWERS AND
OBJECTIONS TO PLAINTIFFS' FIRST
SET OF REQUESTS FOR ADMISSION
TO DEFENDANT**

PROPOUNDING PARTY: Plaintiffs Cat Brooks and Rasheed Shabazz

RESPONDING PARTY: Defendant Thomson Reuters Corporation

SET NO: One

Thomson Reuters Corporation (“Thomson Reuters”), by its counsel, hereby answers pursuant to Federal Rule of Civil Procedure 36 Plaintiffs’ First Set of Requests for Admission (the “Requests”). Thomson Reuters’ answers and objections (“Answers”) are based on information currently available to Thomson Reuters, as discovery is not complete and Thomson Reuters’ investigation is ongoing.

ANSWERS AND OBJECTIONS

REQUEST FOR ADMISSION NO. 1:

Admit that the document produced at TR-BROOKS020865-TR-BROOKS020890 is identical or substantially similar to the document referenced in Thomson Reuters’ letter to the House Oversight and Reform Subcommittee on Economic and Consumer Policy, produced as TR-BROOKS020853-TR-BROOKS020857, which Thomson Reuters described as “an example of the data elements that can be delivered in a typical report...[and] is representative of all the data available on CLEAR[.]” *See* TR-BROOKS020853.

ANSWER TO REQUEST FOR ADMISSION NO. 1:

Thomson Reuters objects to the Request as improper because it is compound in that it could be interpreted to ask Thomson Reuters both to admit (a) that the document produced at TR-BROOKS020865-TR-BROOKS020890 is identical or substantially similar to the document attached to the letter produced as TR-BROOKS020853-TR-BROOKS020857, and (b) that the letter describes the document in the manner stated in the Request. Thomson Reuters therefore interprets the Request to ask only (a) and, subject to and without waiving its objection, answers the Request as follows.

Thomson Reuters ADMITS that the document produced at TR-BROOKS020865-TR-BROOKS020890 is identical or substantially similar to the document identified in the April 28, 2021 letter from Thomson Reuters to the House Oversight and Reform Subcommittee on Economic and Consumer Policy, the document produced as TR-BROOKS020853-TR-BROOKS020857 (the “Letter”), as “a sample of a CLEAR report template, which is an example of the data elements that can be delivered in a typical report.” The next sentence in the

1 Letter was: "While this is representative of all of the data available on CLEAR, not every report
2 will include all of this information or have all data fields populated." TR-BROOKS020853.
3 Except as expressly admitted, Thomson Reuters DENIES this Request.
4

5 Dated: May 23, 2022

PERKINS COIE LLP

7 By: /s/ Susan D. Fahringer

Susan D. Fahringer, Bar No. 21567

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9 Attorneys for Defendant
10 Thomson Reuters Corporation
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PROOF OF SERVICE

I, Anna Mouw Thompson, declare:

I am a citizen of the United States and employed in Seattle, Washington. I am over the age of eighteen years and not a party to the within-entitled action. My business address is 1201 Third Avenue, Ste. 4900, Seattle, WA 98110. On May 23, 2022, I served a copy of the within document(s):

**DEFENDANT THOMSON REUTERS CORPORATION'S ANSWERS AND
OBJECTIONS TO PLAINTIFFS' FIRST SET OF REQUESTS FOR
ADMISSION TO DEFENDANT**



by transmitting via my e-mail address (AnnaThompson@perkinscoie.com) the document listed above to the persons at the e-mail addresses set forth below.

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I declare under penalty of perjury under the laws of the United States of America that the above is true and correct.

Executed on May 23, 2022, at Bainbridge Island, WA.



Anna Mouw Thompson