EXHIBIT 22

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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 SECOND SUPPLEMENTAL ANSWERS AND OBJECTIONS TO PLAINTIFFS' FIRST SET OF INTERROGATORIES 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, pursuant to Rule 33 of the Federal Rules of Civil Procedure hereby provides the following Second Supplemental Answers and Objections to Plaintiffs' First Set of Interrogatories to Defendant ("Interrogatories"). These supplemental Answers and Objections necessarily incorporate and add to Thomson Reuters' original Answers and Objections to Plaintiffs' First Set of Interrogatories. Thomson Reuters' combined answers and objections ("Answers") are based on information currently available to Thomson Reuters as discovery is not complete and Thomson Reuters' investigation is ongoing. Thomson Reuters reserves the right to further supplement or amend these Answers should additional information become available through the discovery process or otherwise.

ANSWERS AND OBJECTIONS

INTERROGATORY NO. 1:

Identify all categories of content (e.g., arrest records, DMV records, relatives and associates analysis), whether public or proprietary, relating to Californians that have been queried or were available to be queried using CLEAR at any point between January 1, 2015, and the present.

ANSWER TO INTERROGATORY NO. 1:

Subject to and without waiving the objections set forth below, Thomson Reuters' answer to this Interrogatory is set forth in Attachment A in its entirety, including in particular its discussion of the information available through CLEAR and of the treatment of information available through CLEAR.

Thomson Reuters objects to this Interrogatory as not proportionate to the needs of the case. CLEAR is not designed to retrieve the information sought by this Interrogatory, and the manual investigation that Thomson Reuters would need to undertake to provide any further answer to this Interrogatory is unduly burdensome and not proportional to the needs of the case in light of (a) the importance of the issues at stake in the action; (b) the amount in controversy; (c) the parties' relative access to relevant information; (d) the parties' resources; and (e) the importance of such discovery in resolving the issues. This Interrogatory also is overly broad and

unduly burdensome and seeks information that is irrelevant and not proportional to the needs of the case because it purports to require Thomson Reuters to provide information regarding "each" category of content regardless of its relevance. The limitation "relating to Californians that have been queried or were available to be queried using CLEAR at any point between January 1, 2015, and the present" is also so broad and vague as to make this Interrogatory unanswerable as phrased.

Thomson Reuters further objects to this Interrogatory on the following grounds:

1. The undefined phrase "categories of content" is inherently vague and ambiguous, making it impossible for Thomson Reuters to respond to this Interrogatory as written.
2. Thomson Reuters objects to the definition of "Identify" on the grounds that it is vague, overly broad, unduly burdensome, and not reasonably tailored to Plaintiffs' legitimate discovery needs in that it purports to require "all names and identifiers" that Thomson Reuters has used to refer to "categories of content" and "all data points that currently or previously have fallen within each category."
3. Thomson Reuters objects to the definition of "Californians" because it does not align to California residency and requires a legal conclusion as to "class period" and so is both as vague and not proportional to the needs of the case.
4. Thomson Reuters also objects on the grounds set forth in its General Objection Nos. 1 (regarding attorney-client and work product privilege) and 3 (regarding the absence of any definition for "CLEAR").

FIRST SUPPLEMENTAL ANSWER TO INTERROGATORY NO. 1:

As stated in Attachment A, the types of content available through CLEAR, the corresponding data sources, and the treatment of data available through CLEAR are set forth in the license agreements between Thomson Reuters and its third-party providers. In answer to Plaintiffs' request that Thomson Reuters identify the license agreements by Bates-stamp number, Thomson Reuters supplements its answer to state that these were produced on April 15 at TR-

BROOKS035636 – TRBROOKS039381. The types of content are also set forth in the CLEAR user guides (e.g., TR-BROOKS001363 – TR-BROOKS001482), CLEAR reports and records (e.g., TR-BROOKS003512 –TR-BROOKS008325, TR-BROOKS008812 – TR-BROOKS010210, TR-BROOKS008326 – TR-BROOKS008759, TR-BROOKS010211 – TR-BROOKS013505), marketing materials (e.g., TR-BROOKS000959 – TR-BROOKS001030), and other documents already produced, and Thomson Reuters directs Plaintiffs to those documents pursuant to Fed. R. Civ. P. 33(d).

INTERROGATORY NO. 2:

For each category of content responsive to Interrogatory No. 1, list the data sources corresponding to each category from which You have obtained or have had the ability to obtain data.

ANSWER TO INTERROGATORY NO. 2:

Subject to and without waiving the objections set forth below, Thomson Reuters' answer to this Interrogatory is set forth in Attachment A in its entirety, including in particular its discussion of the information available through CLEAR and of the treatment of information available through CLEAR.

Thomson Reuters incorporates its answer and objections to Interrogatory No. 1, and further objects to providing any further answer to this Interrogatory on the following grounds:

1. To the extent this Interrogatory seeks prospective data sources from which Thomson Reuters has "the ability to obtain data" but from which it has not actually obtained data, the Interrogatory seeks information that is not relevant to any party's claims or defenses and is not proportional to the needs of this case for that reason as well.
2. The undefined phrase "data sources" is inherently vague and ambiguous, making it impossible for Thomson Reuters to answer this Interrogatory as written.

FIRST SUPPLEMENTAL ANSWER TO INTERROGATORY NO. 2:

As stated in Attachment A, the types of content available through CLEAR, the corresponding data sources, and the treatment of data available through CLEAR are set forth in the license agreements between Thomson Reuters and its third-party providers. In answer to Plaintiffs' request that Thomson Reuters identify the license agreements by Bates-stamp number, Thomson Reuters supplements its answer to state that these were produced on April 15 at TR-BROOKS035636 – TRBROOKS039381. The types of content are also set forth in the CLEAR user guides (e.g., TR-BROOKS001363 – TR-BROOKS001482), CLEAR reports and records (e.g., TR-BROOKS003512 –TR-BROOKS008325, TR-BROOKS008812 – TR-BROOKS010210, TR-BROOKS008326 – TR-BROOKS008759, TR-BROOKS010211 – TR-BROOKS013505), marketing materials (e.g., TR-BROOKS000959 – TR-BROOKS001030), and other documents already produced, and Thomson Reuters directs Plaintiffs to those documents pursuant to Fed. R. Civ. P. 33(d).

INTERROGATORY NO. 8:

For each category of content responsive to Interrogatory No. 1, identify the frequency with which that data is updated (for example, You describe utility records as being updated daily at Bates Number TR-BROOKS001116), including whether that data is updated in real time (such as You describe for incarceration and arrest records at Bates Number TR-BROOKS001884), and whether that data can be accessed through a live gateway (such as You describe for access to vehicle registration data at Bates Number TR-BROOKS002730).

ANSWER TO INTERROGATORY NO. 8:

Subject to and without waiving the objections set forth below, Thomson Reuters' answer to this Interrogatory is set forth in Attachment A in its entirety, including in particular its discussion of the information available through CLEAR and of the treatment of information available through CLEAR.

Thomson Reuters incorporates its answer and objections to Interrogatory No 1.

FIRST SUPPLEMENTAL ANSWER TO INTERROGATORY NO. 8:

As stated in Attachment A, the types of content available through CLEAR, the corresponding data sources, and the treatment of data available through CLEAR are set forth in the license agreements between Thomson Reuters and its third-party providers. In answer to Plaintiffs' request that Thomson Reuters identify the license agreements by Bates-stamp number, Thomson Reuters supplements its answer to state that these were produced on April 15 at TR-BROOKS035636 – TRBROOKS039381. The types of content are also set forth in the CLEAR user guides (e.g., TR-BROOKS001363 – TR-BROOKS001482), CLEAR reports and records (e.g., TR-BROOKS003512 –TR-BROOKS008325, TR-BROOKS008812 – TR-BROOKS010210, TR-BROOKS008326 – TR-BROOKS008759, TR-BROOKS010211 – TR-BROOKS013505), marketing materials (e.g., TR-BROOKS000959 – TR-BROOKS001030), and other documents already produced, and Thomson Reuters directs Plaintiffs to those documents pursuant to Fed. R. Civ. P. 33(d).

INTERROGATORY NO. 9:

For each category of content responsive to Interrogatory No. 1, identify where the data is housed, stored, or otherwise located prior to a query, how You access that data once a query is received, and how You disseminate that data in response to a query, delineated by categories responsive to Interrogatory No.1.

ANSWER TO INTERROGATORY NO. 9:

Thomson Reuters incorporates its answer and objections to Interrogatory No. 1. Subject to and without waiving such objections, Thomson Reuters' answer to this Interrogatory is set forth in Attachment A in its entirety, including in particular its discussion of the information available through CLEAR and of the treatment of information available through CLEAR.

FIRST SUPPLEMENTAL ANSWER TO INTERROGATORY NO. 9:

As stated in Attachment A, the types of content available through CLEAR, the corresponding data sources, and the treatment of data available through CLEAR are set forth in the license agreements between Thomson Reuters and its third-party providers. In answer to

Plaintiffs' request that Thomson Reuters identify the license agreements by Bates-stamp number, Thomson Reuters supplements its answer to state that these were produced on April 15 at TR-BROOKS035636 – TRBROOKS039381. The types of content are also set forth in the CLEAR user guides (e.g., TR-BROOKS001363 – TR-BROOKS001482), CLEAR reports and records (e.g., TR-BROOKS003512 –TR-BROOKS008325, TR-BROOKS008812 – TR-BROOKS010210, TR-BROOKS008326 – TR-BROOKS008759, TR-BROOKS010211 – TR-BROOKS013505), marketing materials (e.g., TR-BROOKS000959 – TR-BROOKS001030), and other documents already produced, and Thomson Reuters directs Plaintiffs to those documents pursuant to Fed. R. Civ. P. 33(d).

Dated: June 1, 2022

PERKINS COIE LLP

By: */s/ Susan D. Fahringer*
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Attorneys for Defendant
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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 June 1, 2022, I served a copy of the within document(s):

DEFENDANT THOMSON REUTERS CORPORATION'S SECOND SUPPLEMENTAL ANSWERS AND OBJECTIONS TO PLAINTIFFS' FIRST SET OF INTERROGATORIES 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 June 1, 2022, at Bainbridge Island, WA.

Anna Mouw Thompson