EXHIBIT 68

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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 CAT BROOKS IN SUPPORT OF PLAINTIFFS' MOTION FOR CLASS CERTIFICATION

I, Cat Brooks, declare:

1. I am a Plaintiff in this action. I submit this declaration in support of Plaintiffs' motion for class certification. I have personal knowledge of the facts in this declaration and, if called as a witness, could and would testify to their accuracy.

2. I live in Oakland, California and am an activist, organizer, playwright, and performer. Currently, I am the executive director of Justice Teams Network and the Anti Police-Terror Project, and I host the radio show Law & Disorder on KPFA. I was raised in an activist household and have dedicated my life to improving the lives of people in my community and bringing awareness to injustices we face through politics, writing, art, and other media.

3. I never gave Thomson Reuters consent to collect, compile, or sell access to my information, and Thomson Reuters never asked me for my consent.

4. Thomson Reuters has never paid me for its use of my personal information.

5. I reviewed my CLEAR profile, which inaccurately stated I had never been married, even though I was married at the time. It also inaccurately suggested that I had worked with certain people who were not employed by the organizations I worked with while I was there.

6. I gave my consent to Quest Research & Investigations to run a search of my information in CLEAR so that I could see my CLEAR profile. Except for the search Quest ran on me, I have never given anyone consent to search my information in CLEAR.

7. I wanted to opt out of my personal information being made available for sale through CLEAR. I went to Thomson Reuters' website to do so, but abandoned the process when Thomson Reuters asked me to provide a photograph of my government-issued ID and a separate picture of my face. I didn't complete the process because I was not comfortable providing Thomson Reuters with even more personal information about me.

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8. I am asking to be appointed as a class representative so that I can represent all Californians whose personal information is available to be searched in CLEAR without their consent. It is my understanding that most Californians are not even aware of CLEAR and may not know that Thomson Reuters is selling access to their information to its customers. I believe that a class lawsuit will save time, money, and effort, and will help to prevent Californians' personal information from being shared without their consent.

9. I have been actively involved in this lawsuit since it started. I have answered interrogatories, communicated with my attorneys to keep apprised of the progress of the case, and have had my deposition taken.

10. I understand the responsibilities of a class representative to protect the interests of the class and am prepared to serve in that role. I am not aware of any conflict that would prevent me from fairly and adequately representing the class.

11. If the Court appoints me to serve as a class representative, I will continue to perform my duties to the best of my ability.

I declare under penalty of perjury that the foregoing is true and correct. Executed on November 7, 2022.

Cat Brooks

Cat Brooks

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Signature Certificate

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Signer	Timestamp	Signature
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