EXHIBIT 1

(Redacted)

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,

vs. Case No. 3:21-cv-1418-EMC

THOMSON REUTERS CORPORATION,

Defendant.

* * * * * * * * * * * * * * *

***** CONFIDENTIAL *****

REMOTE VIDEOTAPED DEPOSITION OF STEVEN FOX

May 16, 2022
10:02 a.m. to 5:36 p.m.
REPORTED BY ANITA KORNBURGER
REGISTERED PROFESSIONAL REPORTER

***** CONFIDENTIAL *****

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A P P E A R A N C E S

GIBBS LAW GROUP LLP, by
Mr. Ezekiel S. Wald
1111 Broadway, Suite 2100
Oakland, California 94607
510-350-9700
zsw@classlawgroup.com
Appearing by videoconference on behalf of the Plaintiffs.

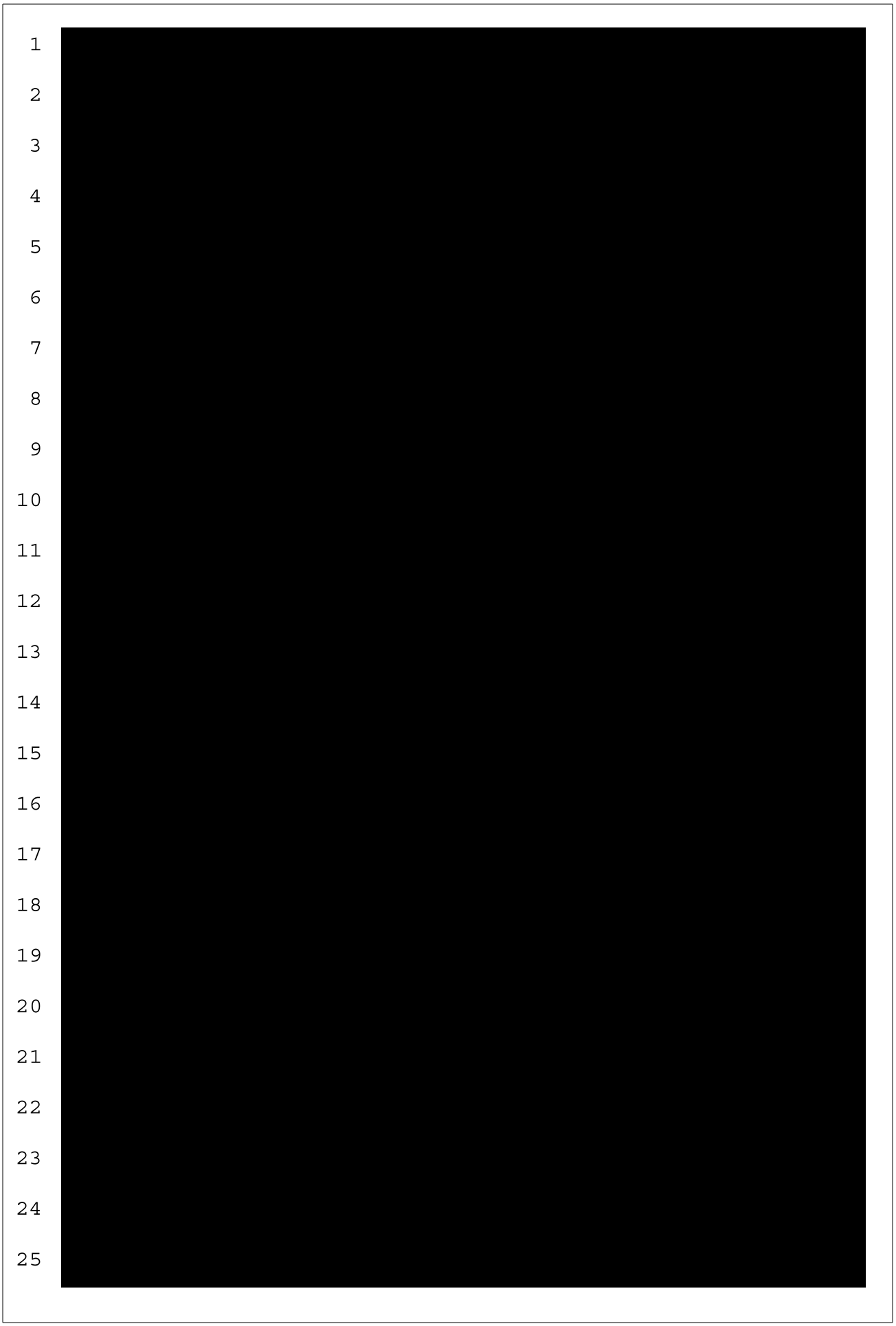
SURVEILLANCE TECHNOLOGY OVERSIGHT PROJECT, by
Mr. Albert Fox Cahn (pro hac vice)
Mr. Evan Enzer
Mr. David Siffert
40 Rector Street, 9th Floor
New York, NY 10006
albert@stopspying.org
Appearing by videoconference on behalf of the Plaintiffs.

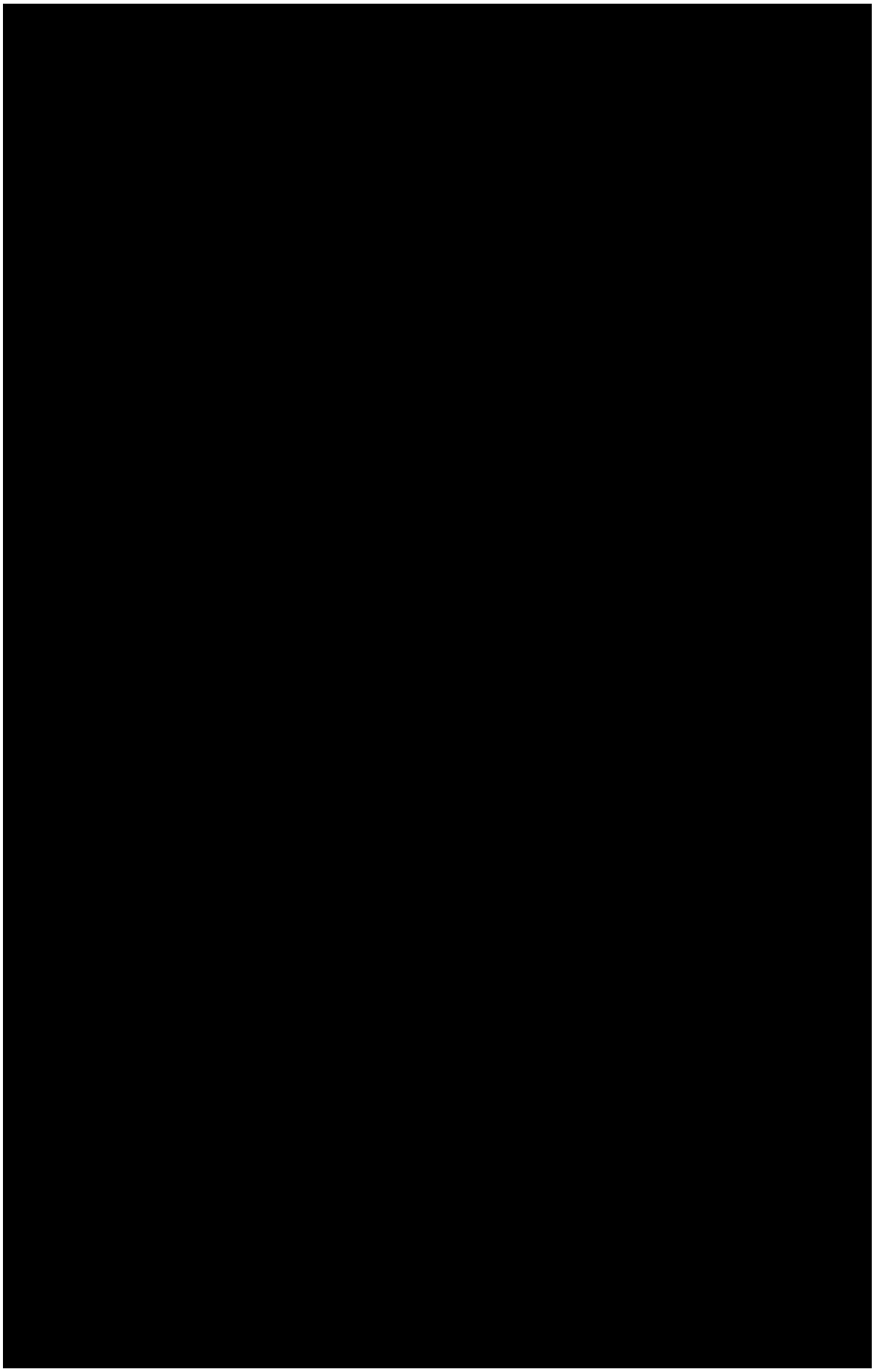
PERKINS COIE LLP, by
Ms. Nicola Menaldo
Ms. Erin Earl
Ms. Susan Fahringer
1201 Third Avenue, Suite 4900
Seattle, Washington 98101-3099
nmenaldo@perkinscoie.com
Appearing by videoconference on behalf of the Defendant.

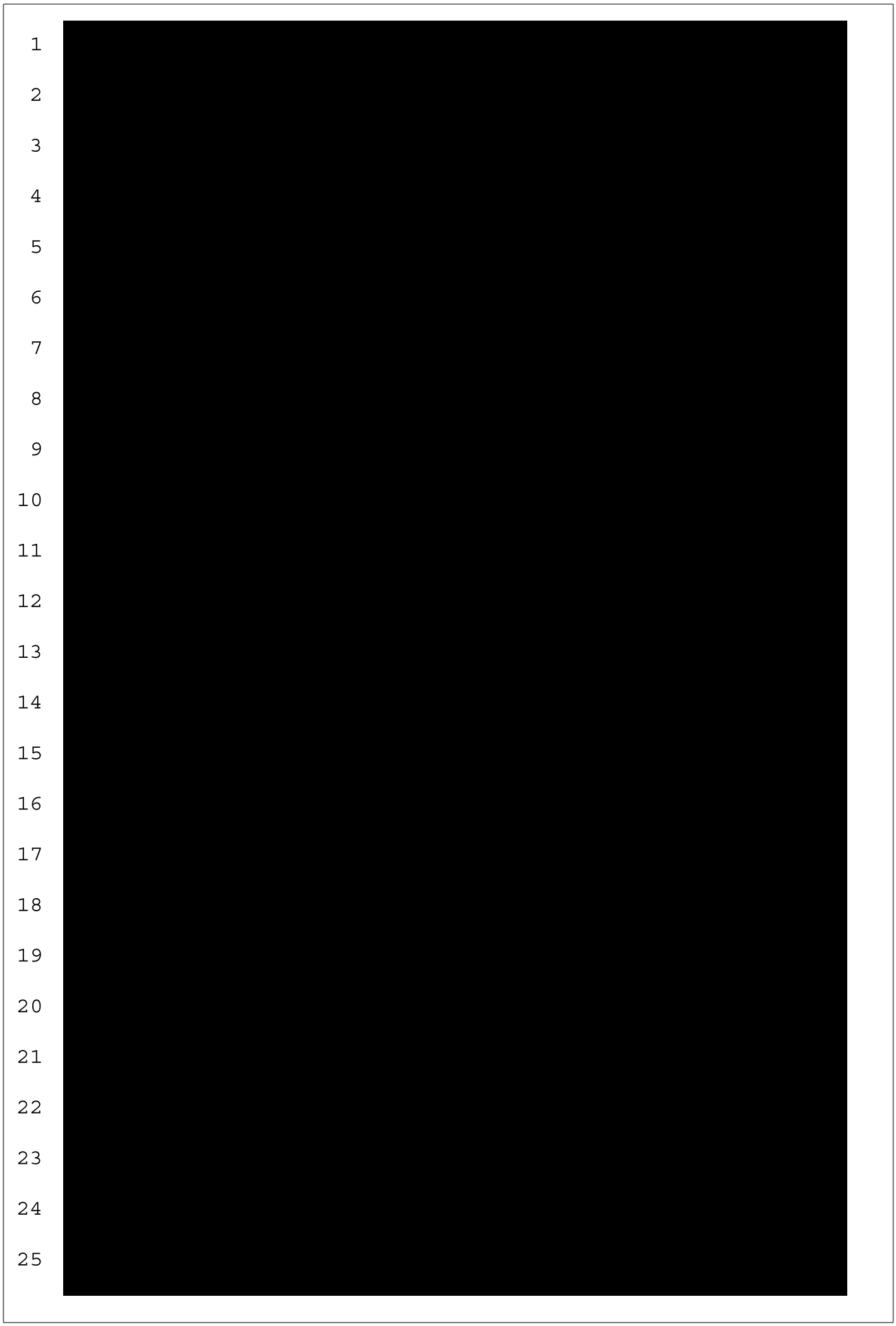
ALSO PRESENT: Jon Olson - Thomson Reuters

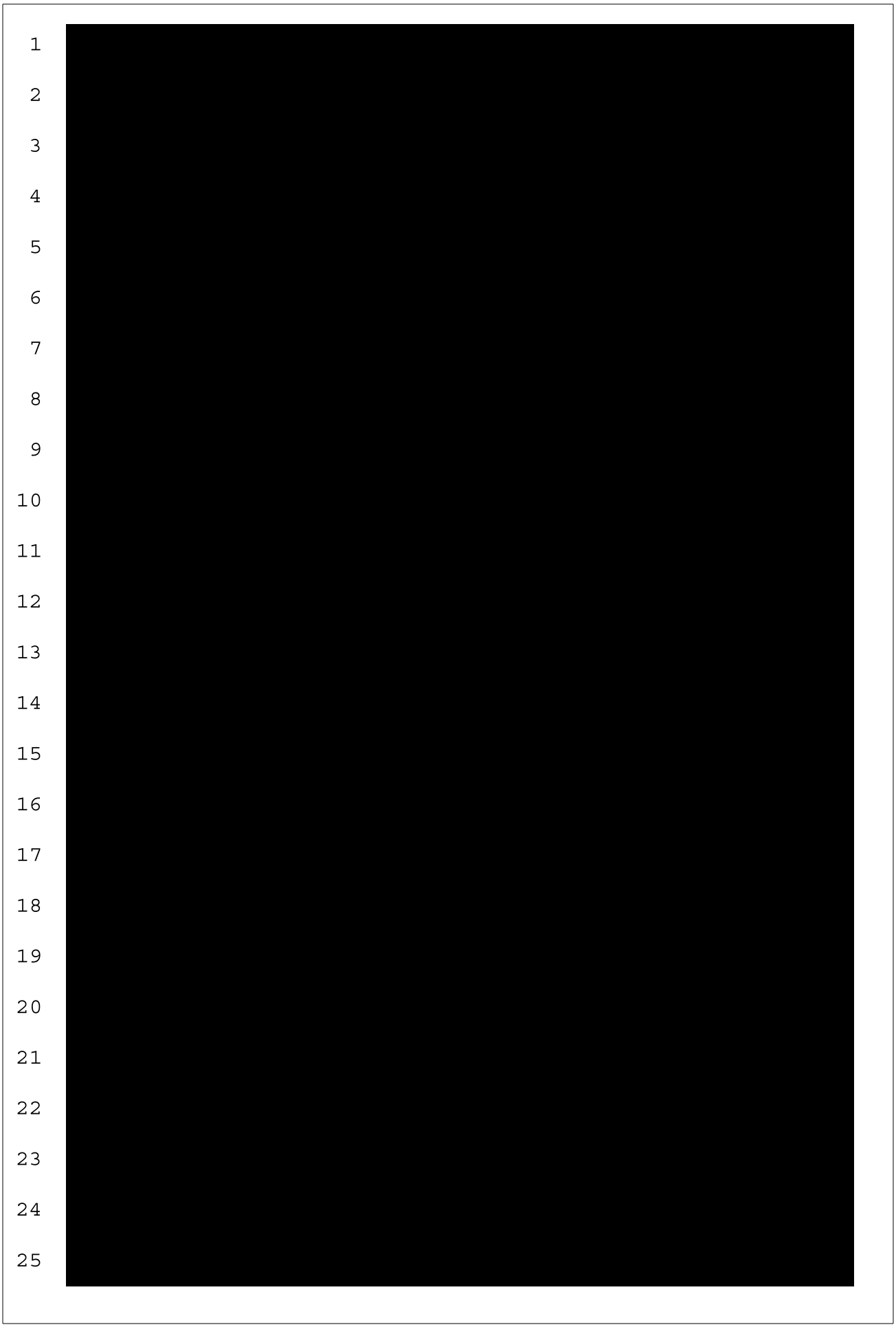
I N D E X

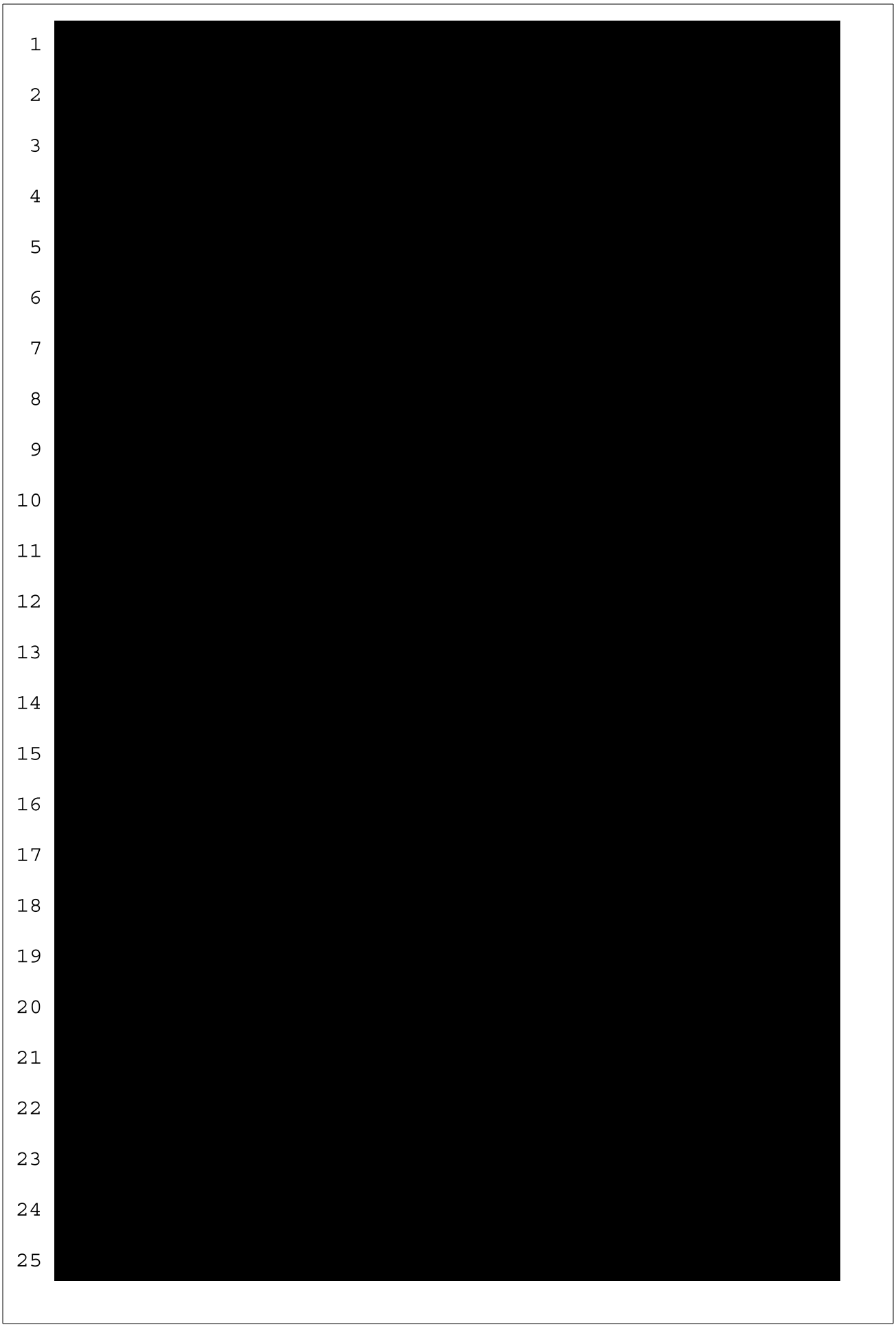
Examination by Page
Mr. Fox Cahn. 6

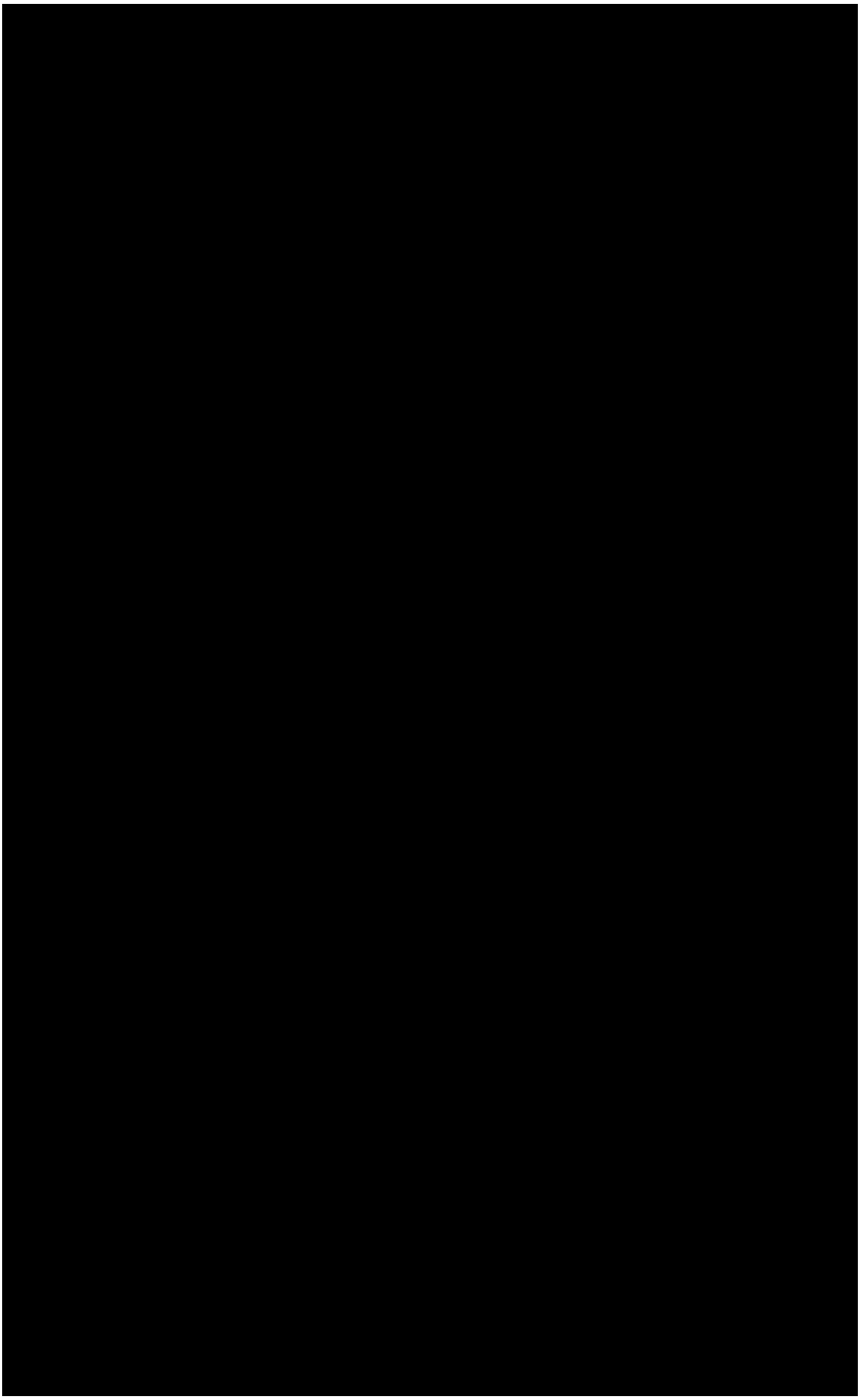


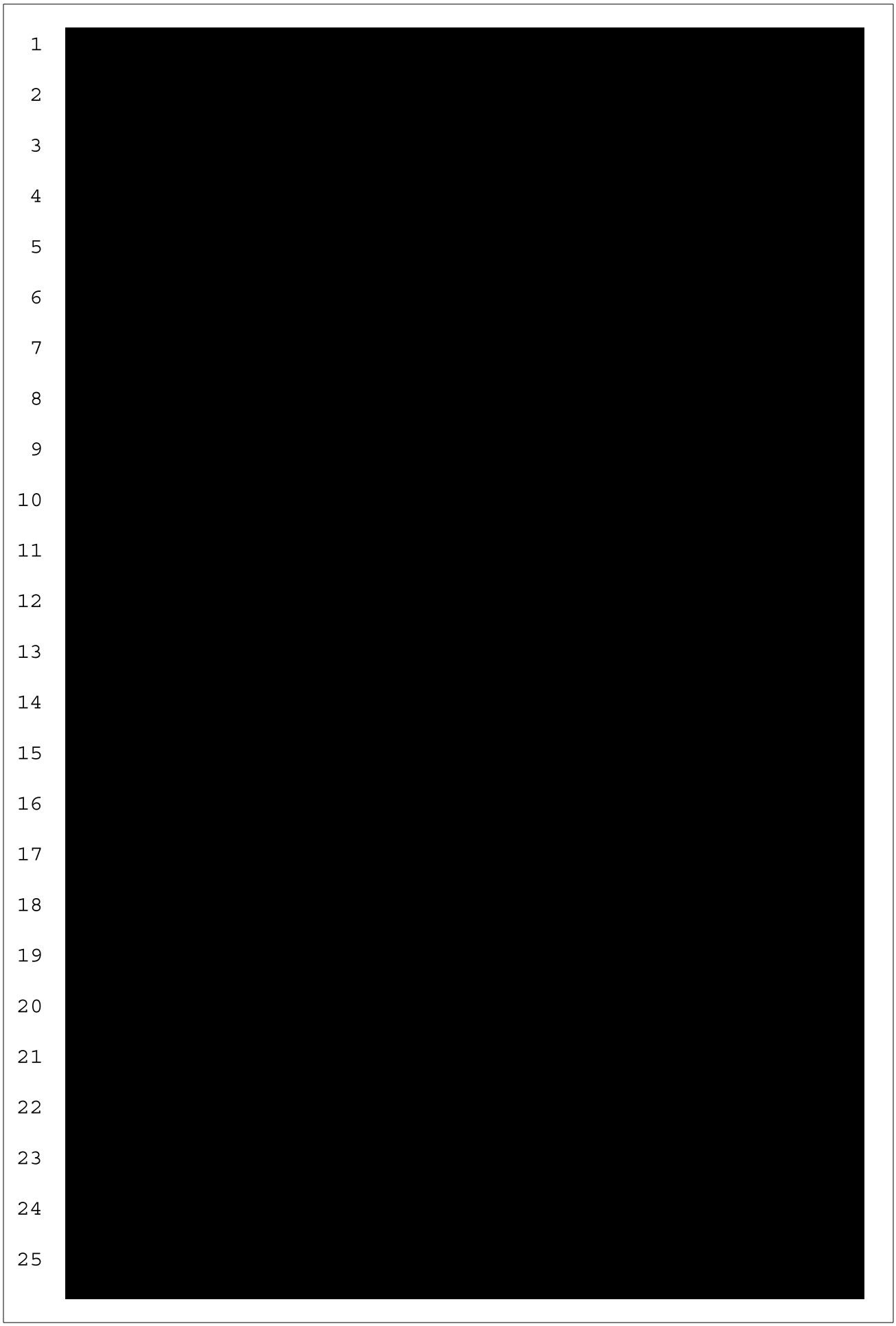


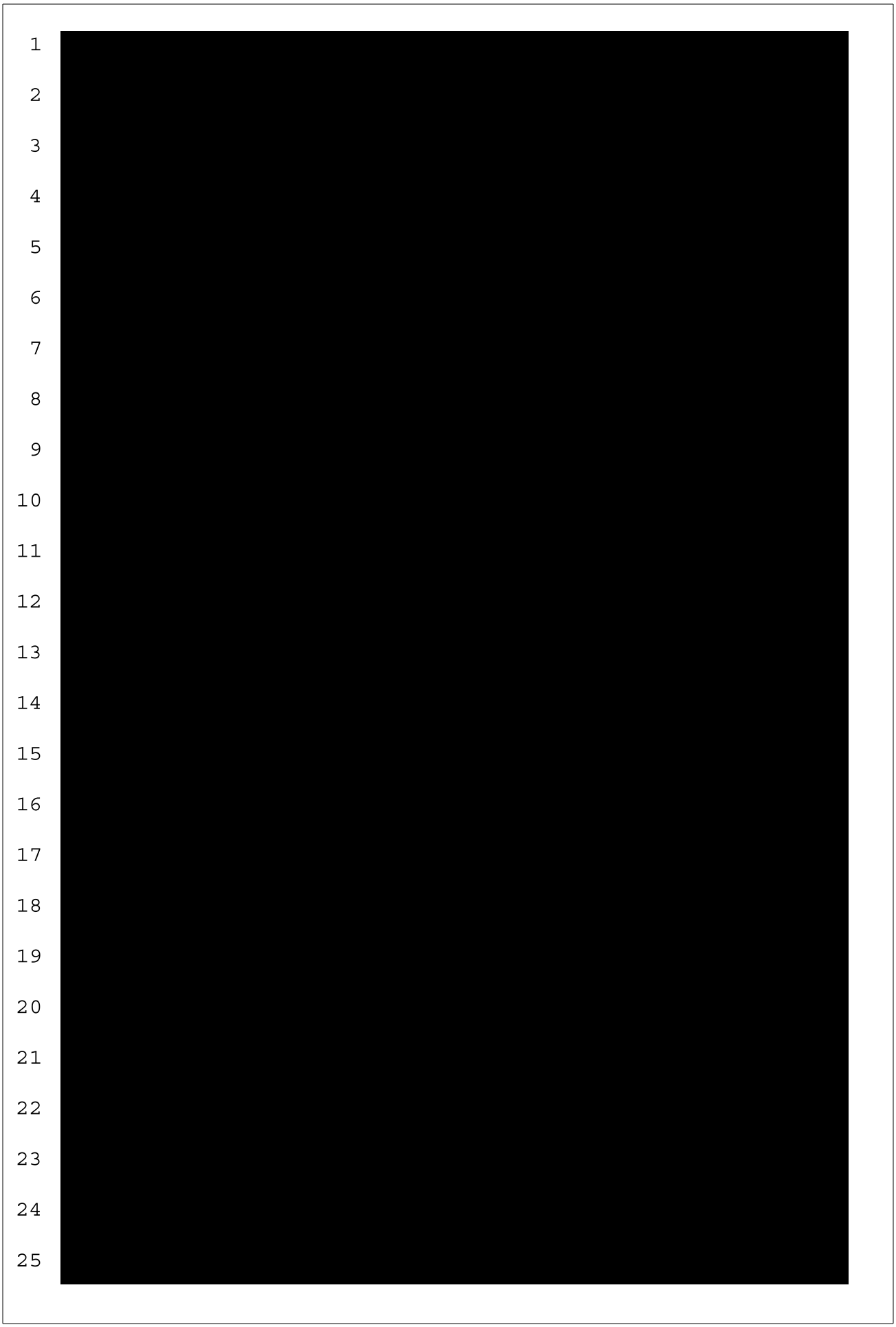


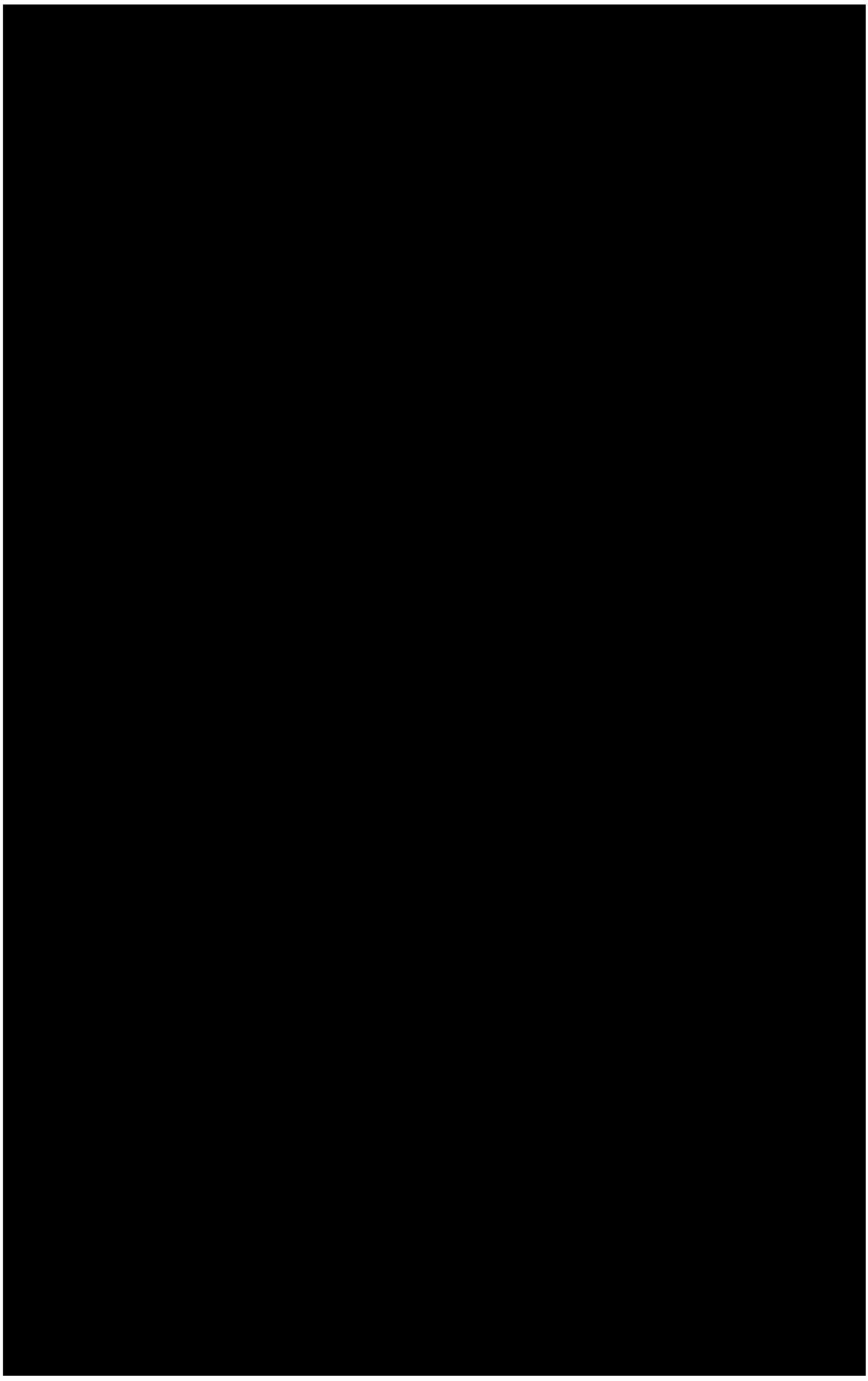


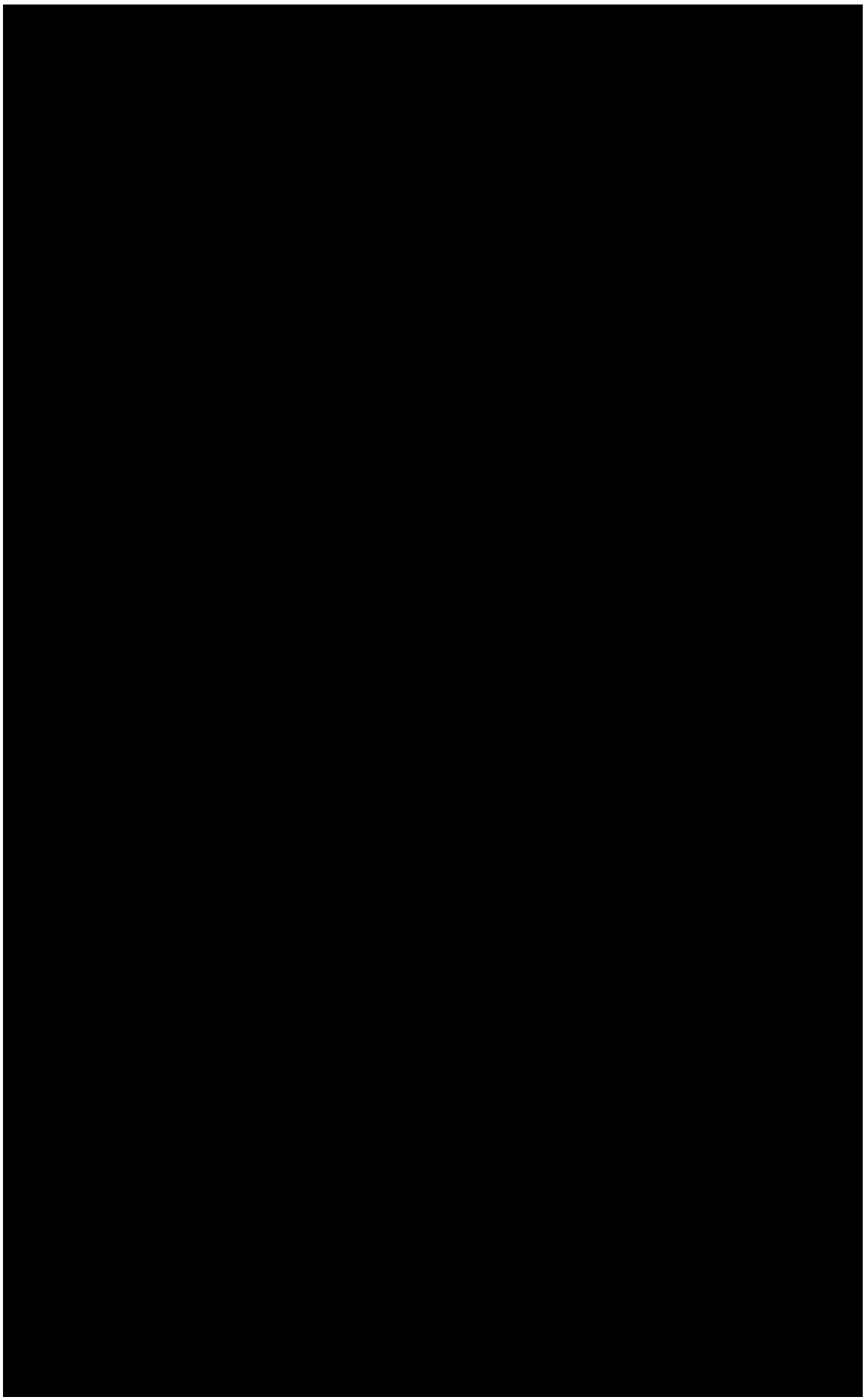














Q. I've just marked plaintiffs' Exhibit 5. It is an e-mail chain with a Bates stamp ending in the number 144207 on the bottom of the first page. Can you confirm that that document is available to you, Mr. Fox?

A. It is available to me.

Q. And can you confirm that Bates stamp is visible on the bottom of the first page?

A. I can confirm that, yes.

Q. Please take a moment to review the document.

A. All right. I've read the document.

Q. Do you know what this document is?

A. Yes.

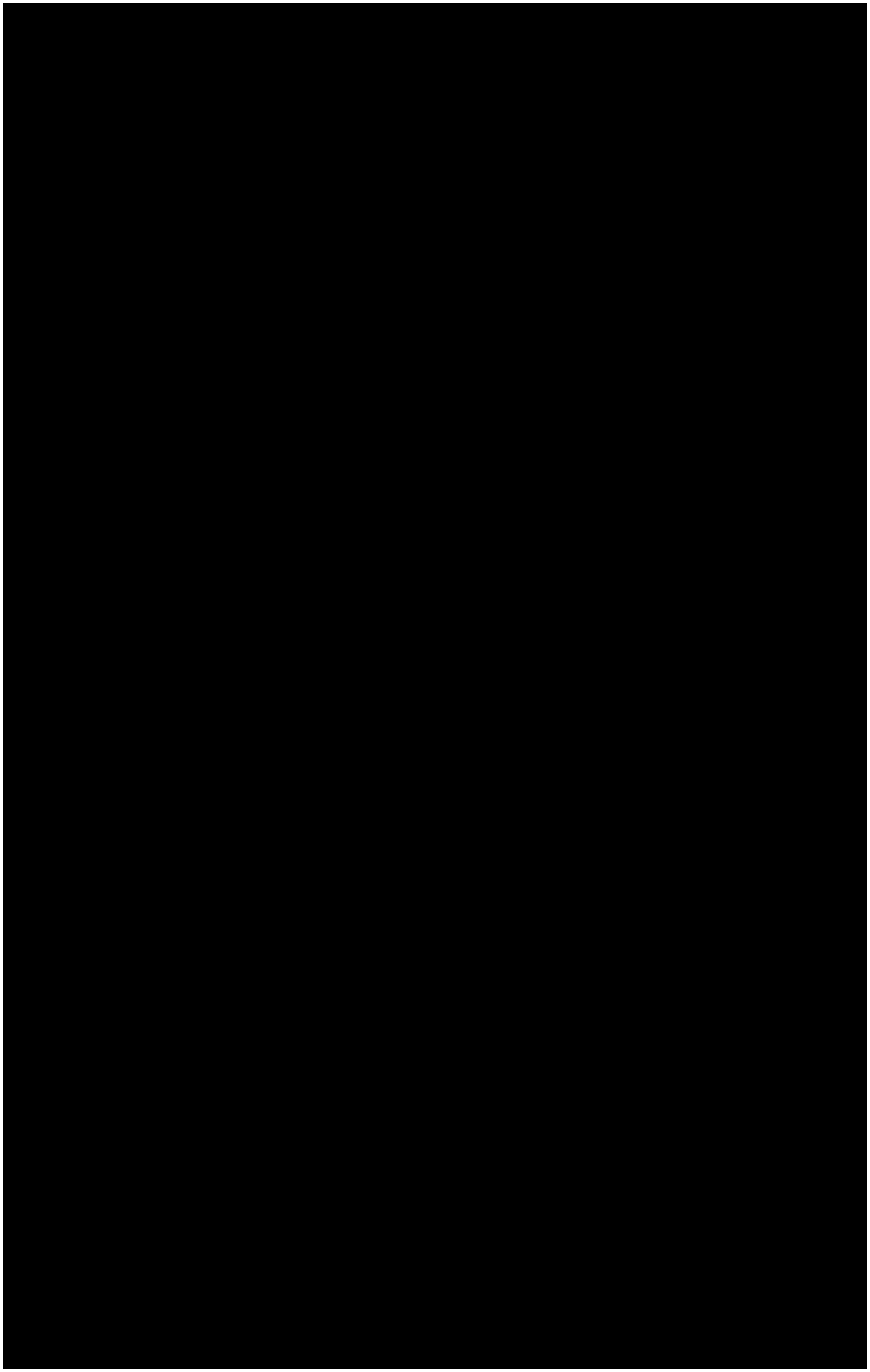
Q. What is it?

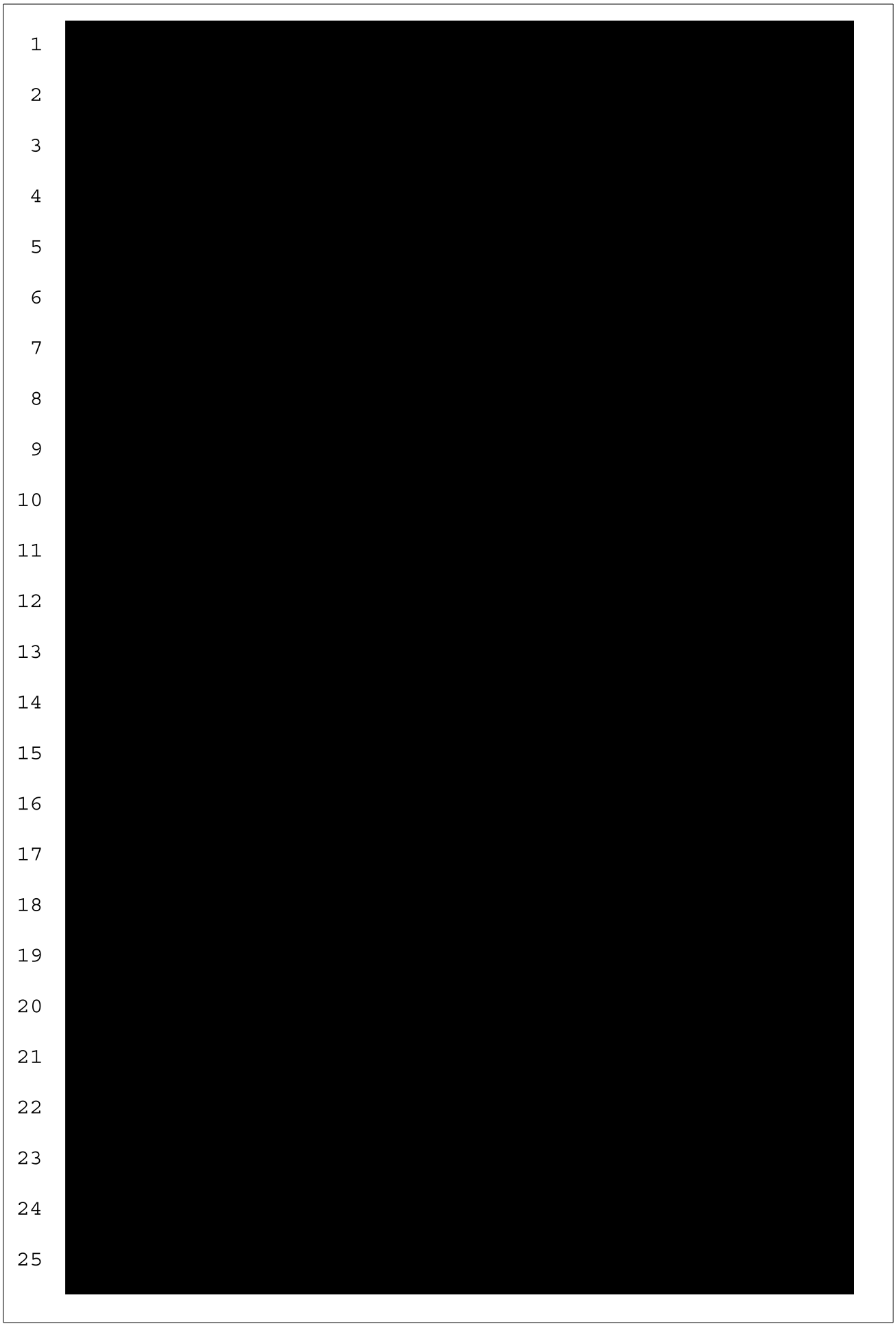
A. It's an e-mail between myself and Leah Weikert. And there are other individuals in the e-mail chain down below.

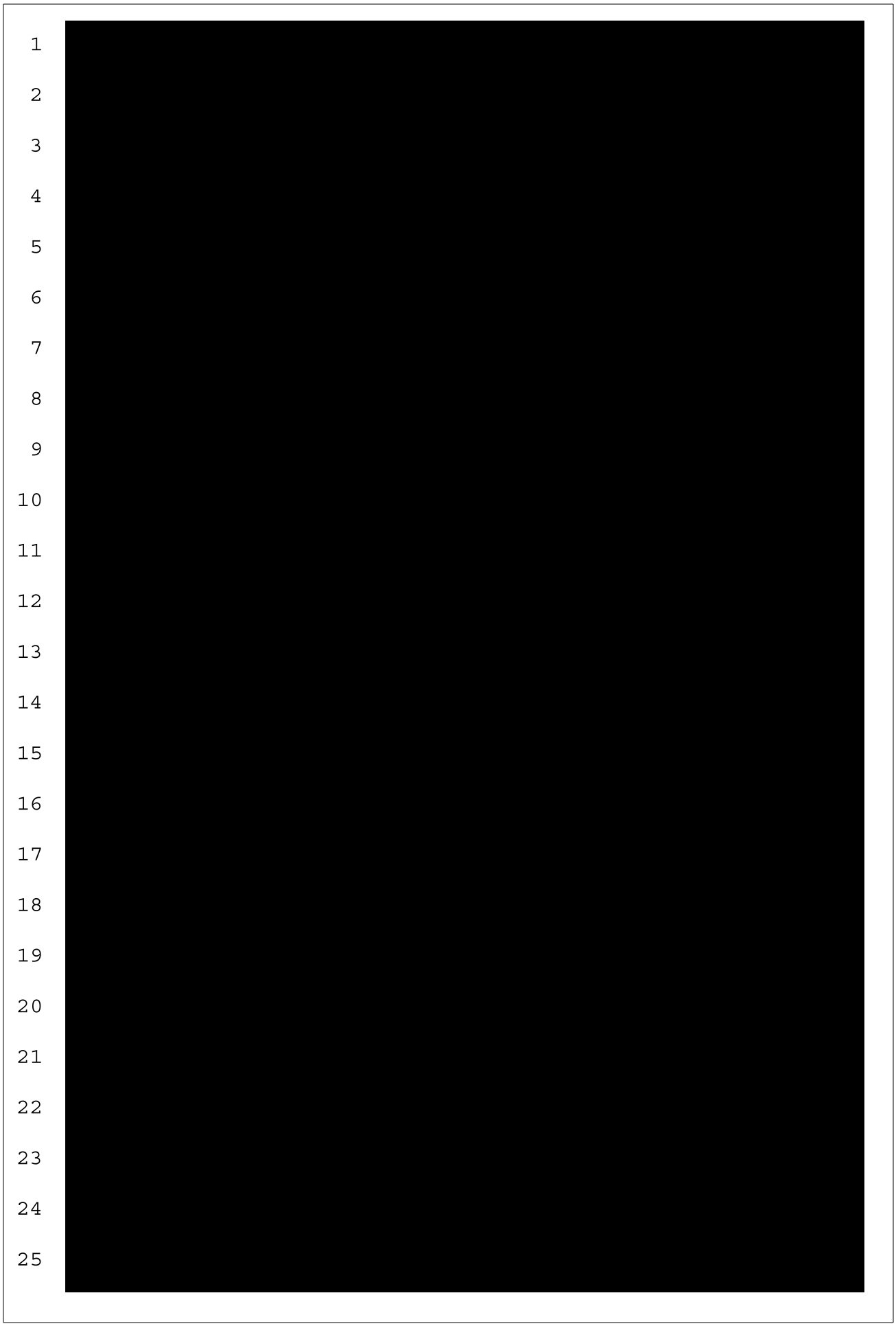
Q. Who's Leah Weikert?

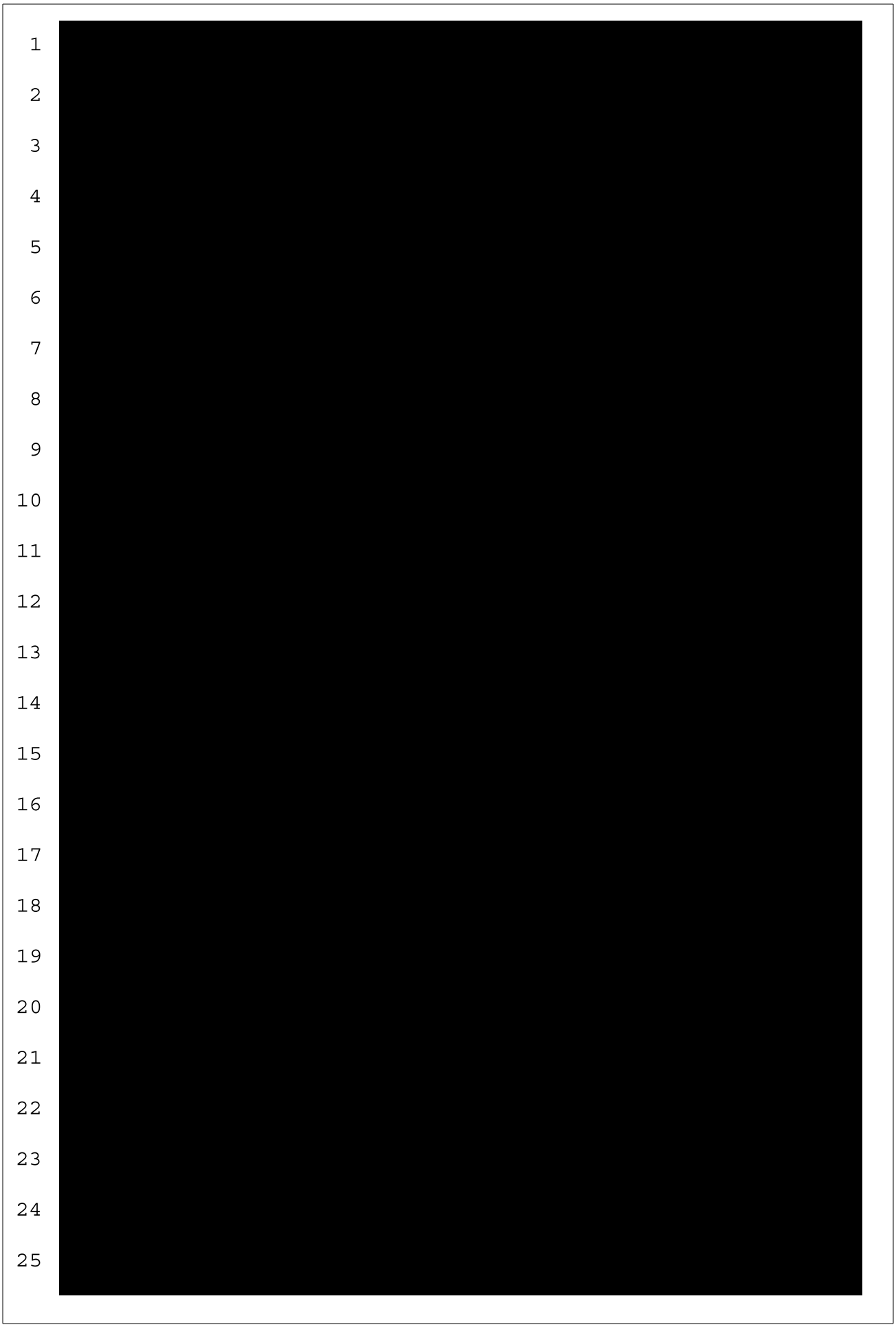
A. She, at the time, was a senior -- senior marketer in our marketing department.

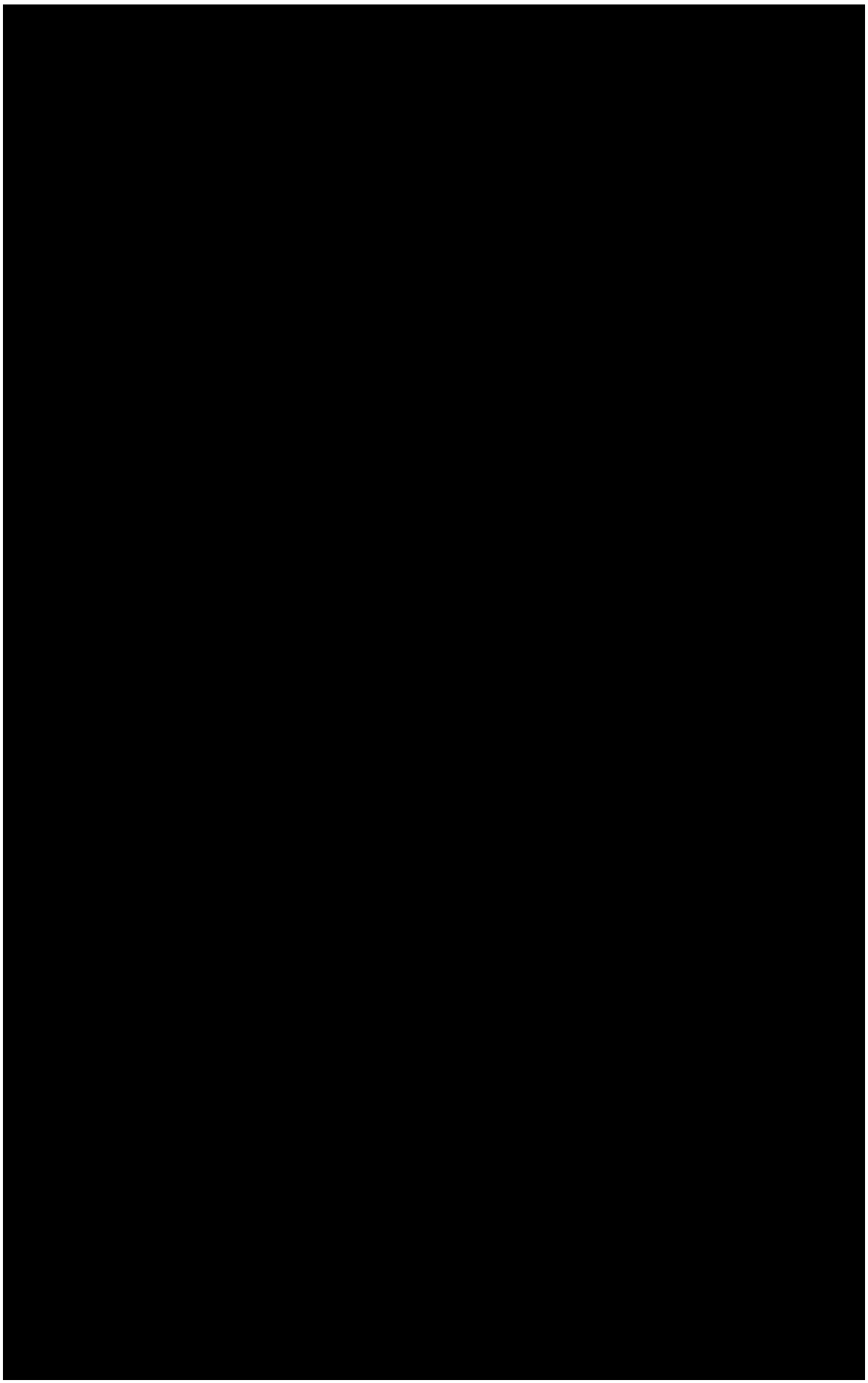
[redacted]

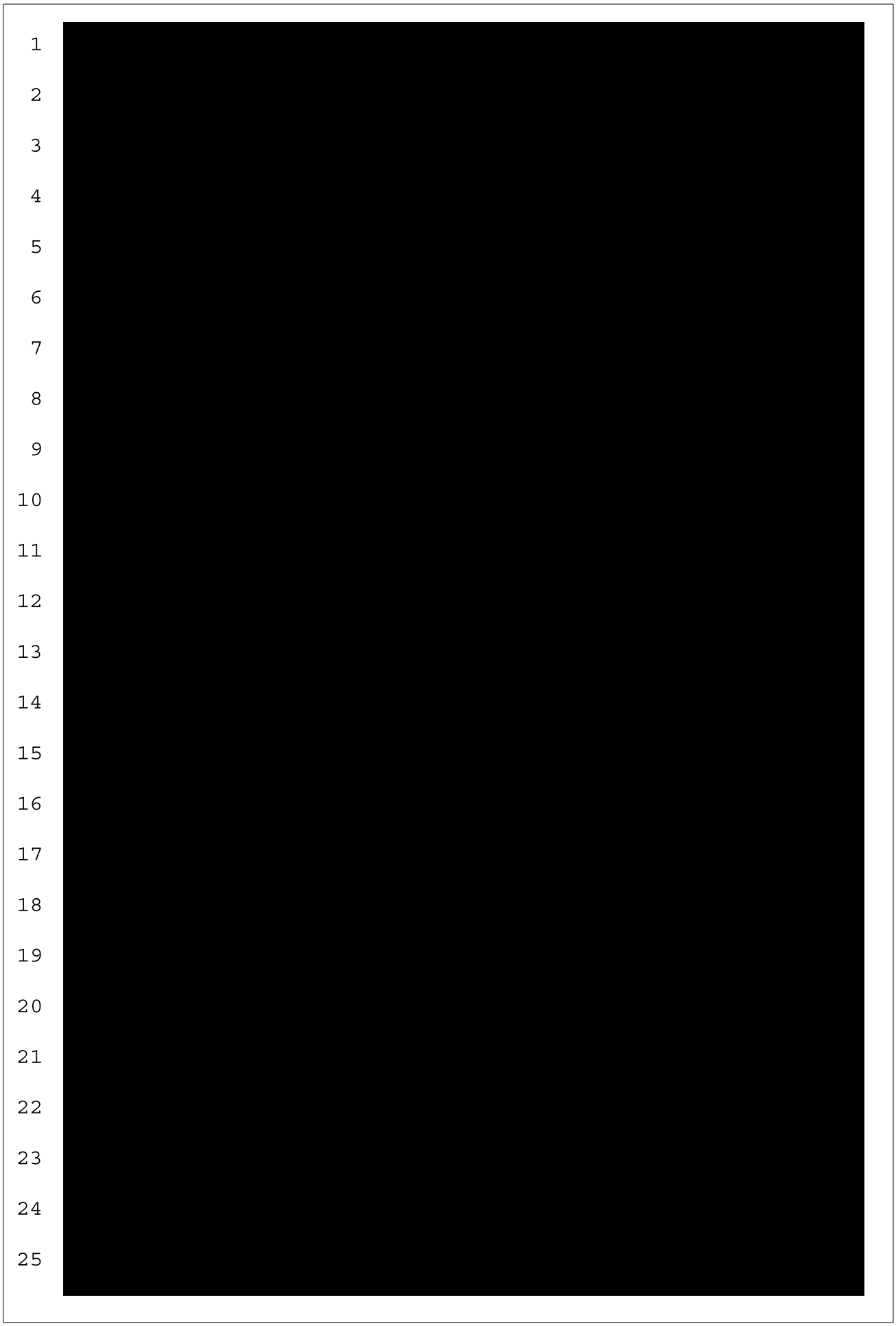


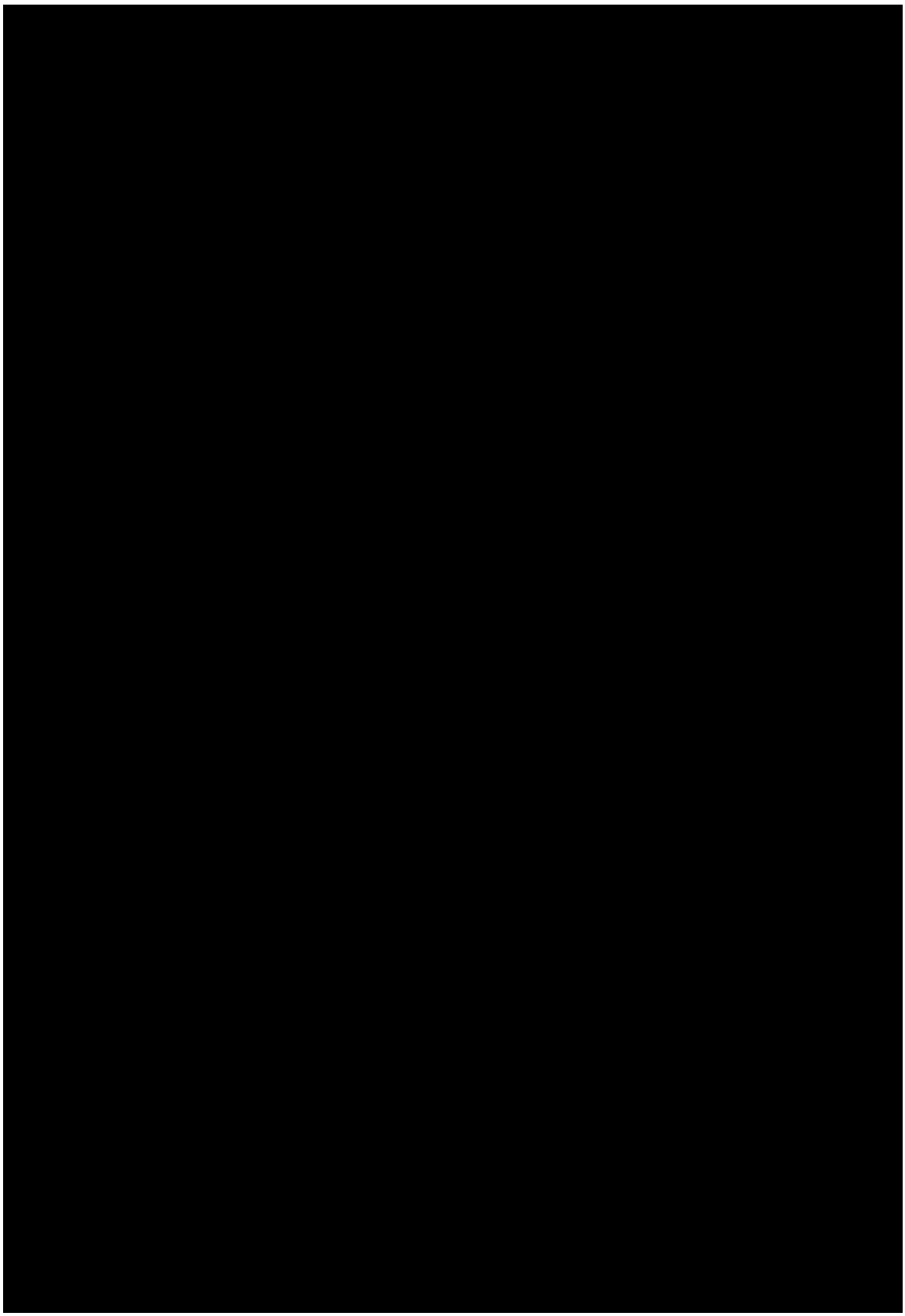












Q. I've just marked Exhibit 9. It is a spreadsheet with the Bates number ending 082062.

entire document so you can view it properly.

THE WITNESS: I will do that, because I'm trying to enlarge it as well, and then the document doesn't load. So give me a minute. I will download it.

MS. MENALDO: If you just click on the three dots, there's an option to download. And it should do that fairly quickly.

BY MR. FOX CAHN:

Q. Mr. Fox, have you been able to download the document?

A. Yes, it is downloaded. I can see it now.

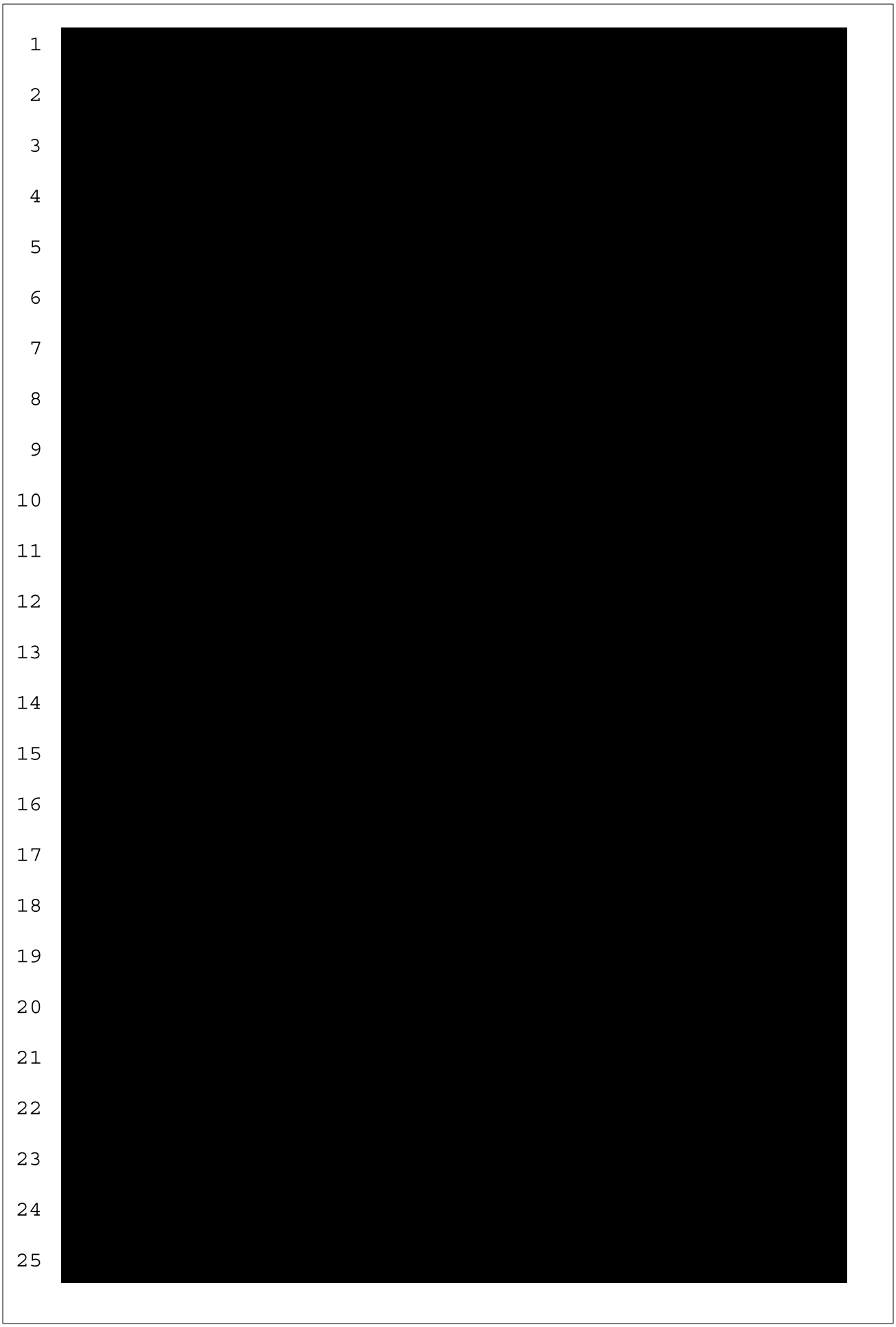
Q. Do you recognize it?

A. I don't specifically recognize this document, no.

Q. All right. Do you recognize the categories of data that are listed in the document?

A. Yes, I do.





[redacted]

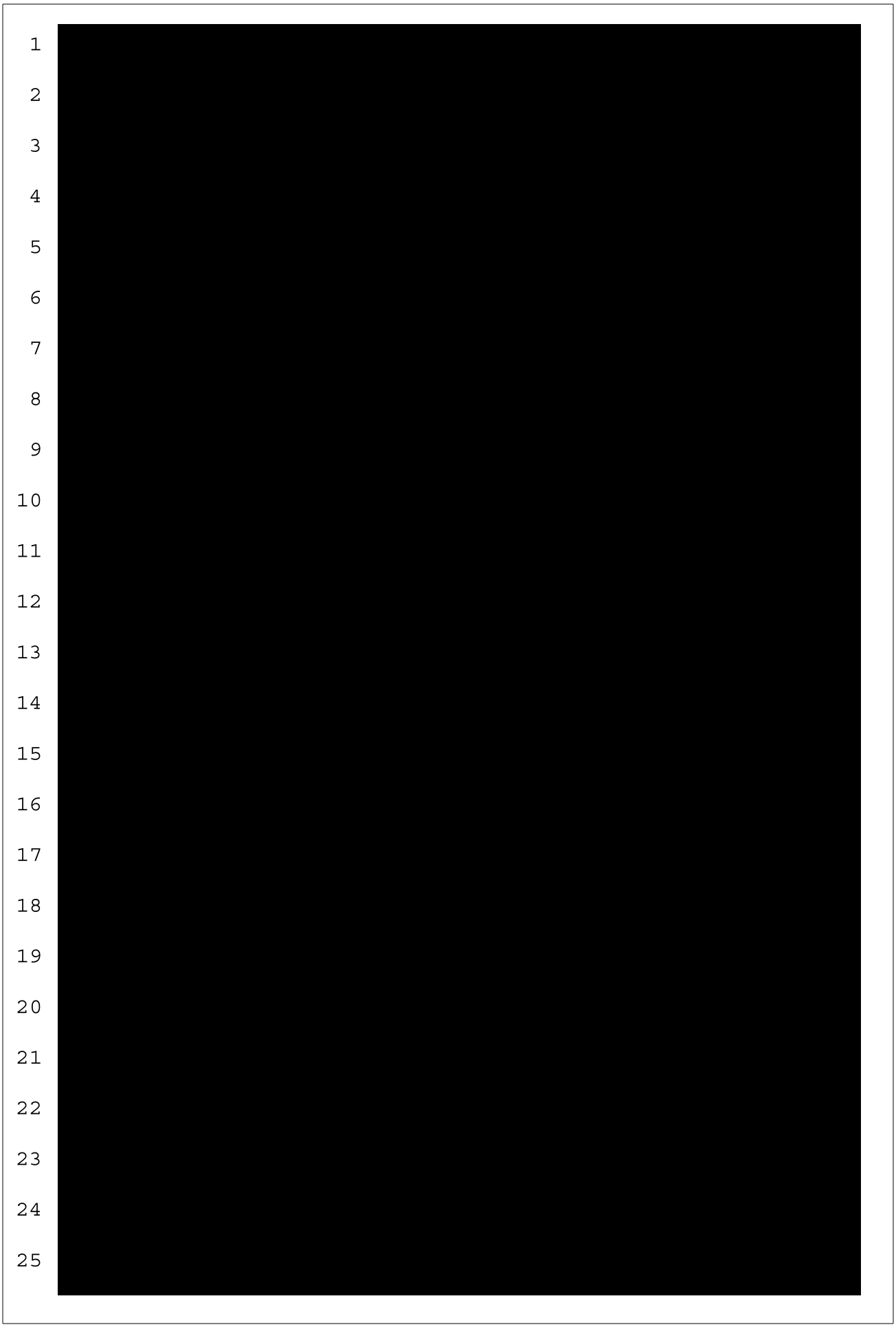
Q. I'm going to mark Exhibit 10. It should be accessible to you now on the platform. It is a document with the Bates number ending in 79617. Do you see that?

A. I do see that.

Q. Have you had time to review this document?

A. Give me a couple of minutes. Okay.

[redacted]



Q. I'm now marking Exhibit 11. It is an e-mail thread with the Bates number ending in 72634 appearing on the bottom of the first page. Can you see that document?

A. I can.

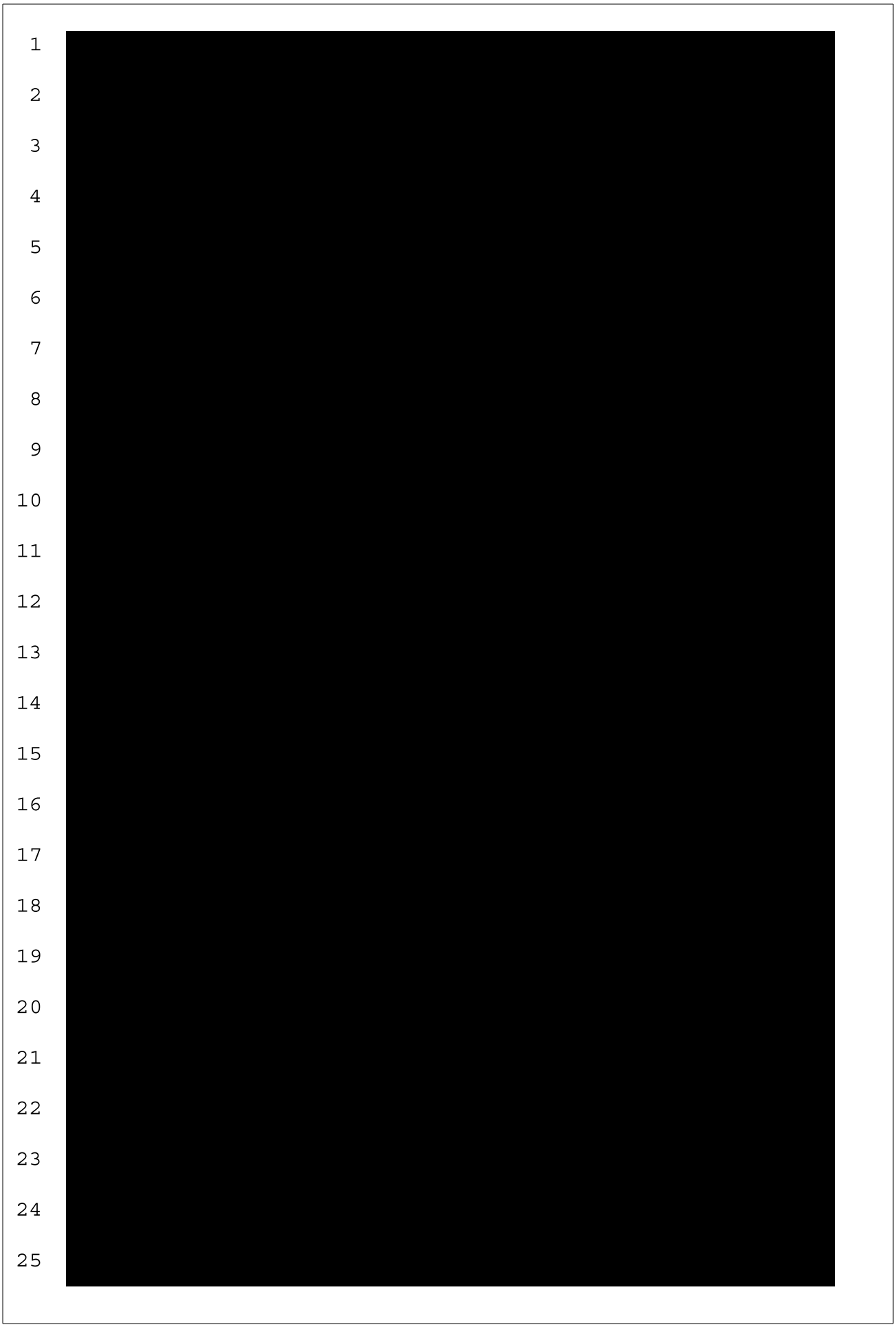
Q. And I'm just going to ask you about the e-mail on the third page.

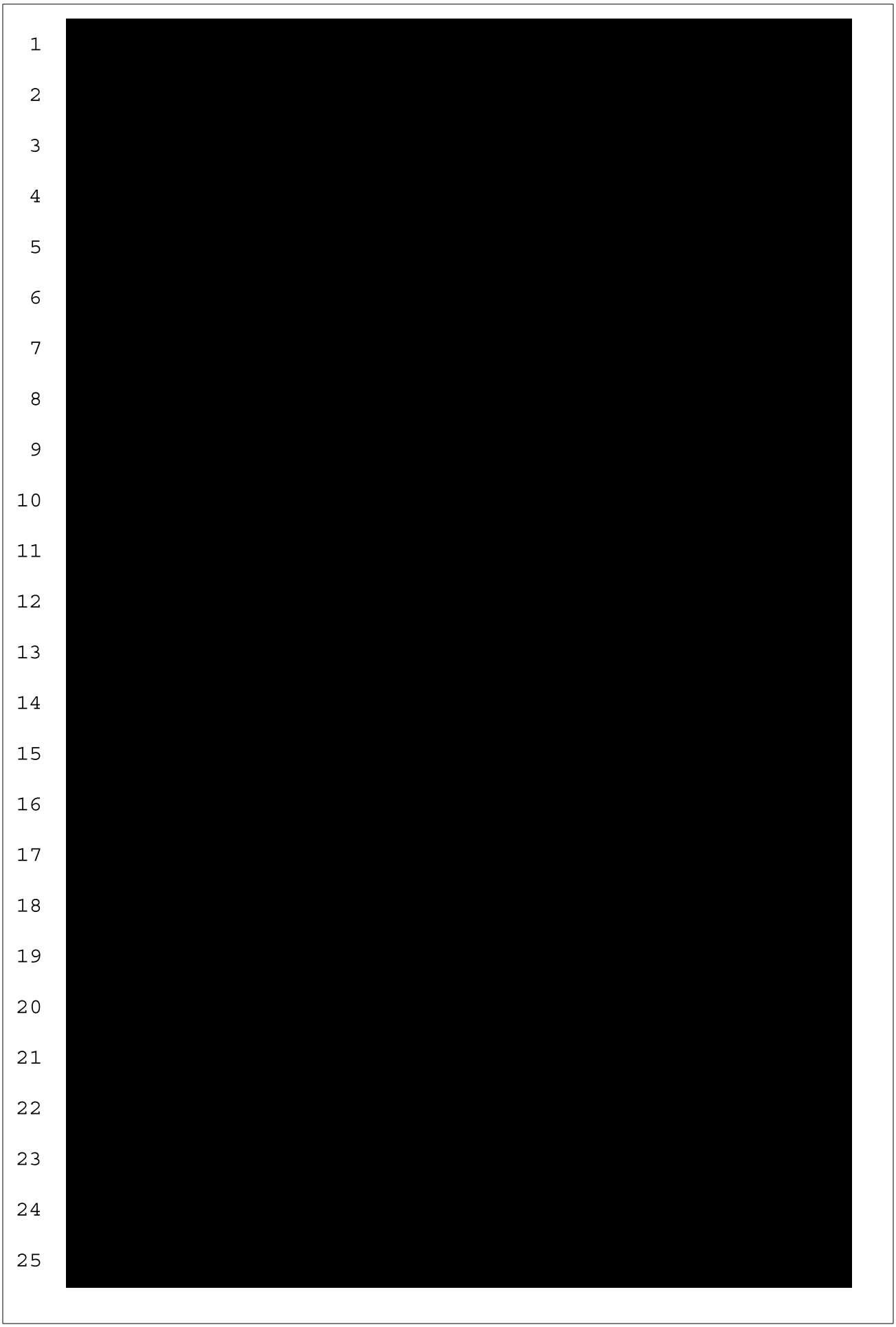
MS. MENALDO: Mr. Fox, you have the right to review the entire document.

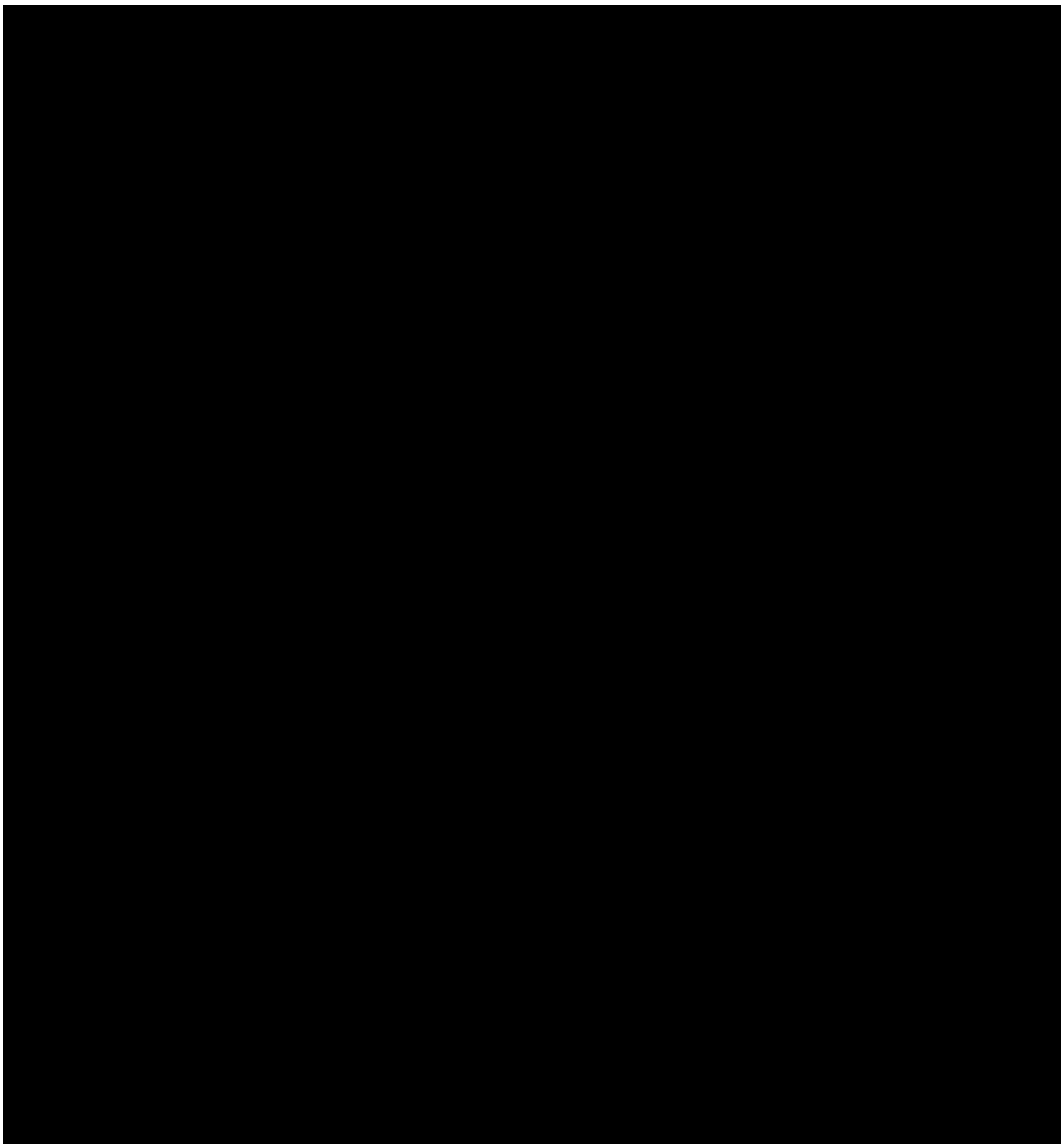
THE WITNESS: Yeah. I will do that. All right, I've read it.

BY MR. FOX CAHN:









Q. All right. I'm now introducing Exhibit 12. It is an e-mail thread with a Bates number on the first page ending in 20290. Do you see that?

A. I do see that.

Q. I'm just going to ask you about the e-mail visible on the top of the second page. So could you please review that?

A. I will.

MS. MENALDO: And I'll remind you that you have the right to review the entire document. Thank you.

BY MR. FOX CAHN:

Q. And apologies, I'll actually be asking about a portion at the bottom of page 3.

A. Okay.

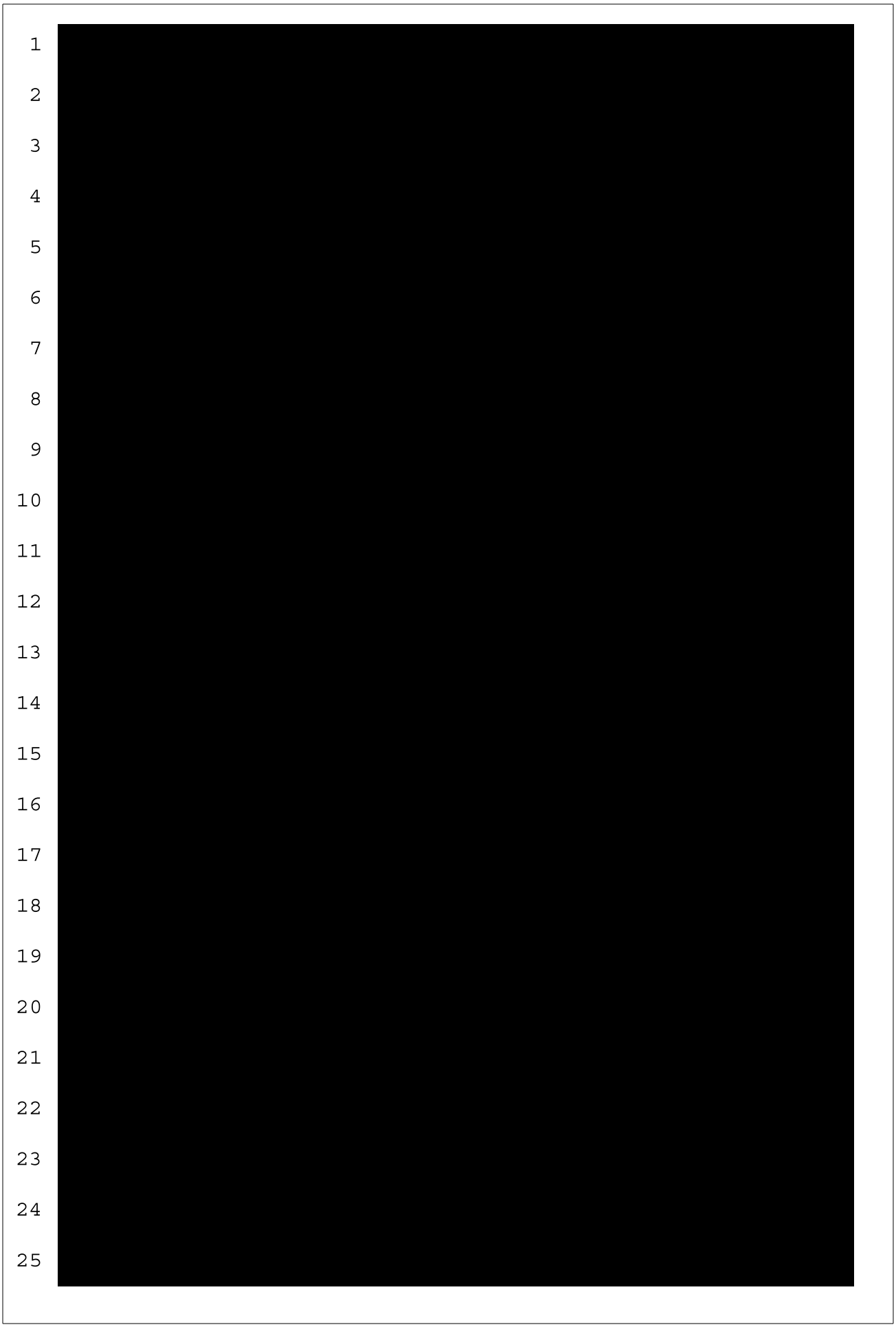
Q. And you've had a chance to review this document?

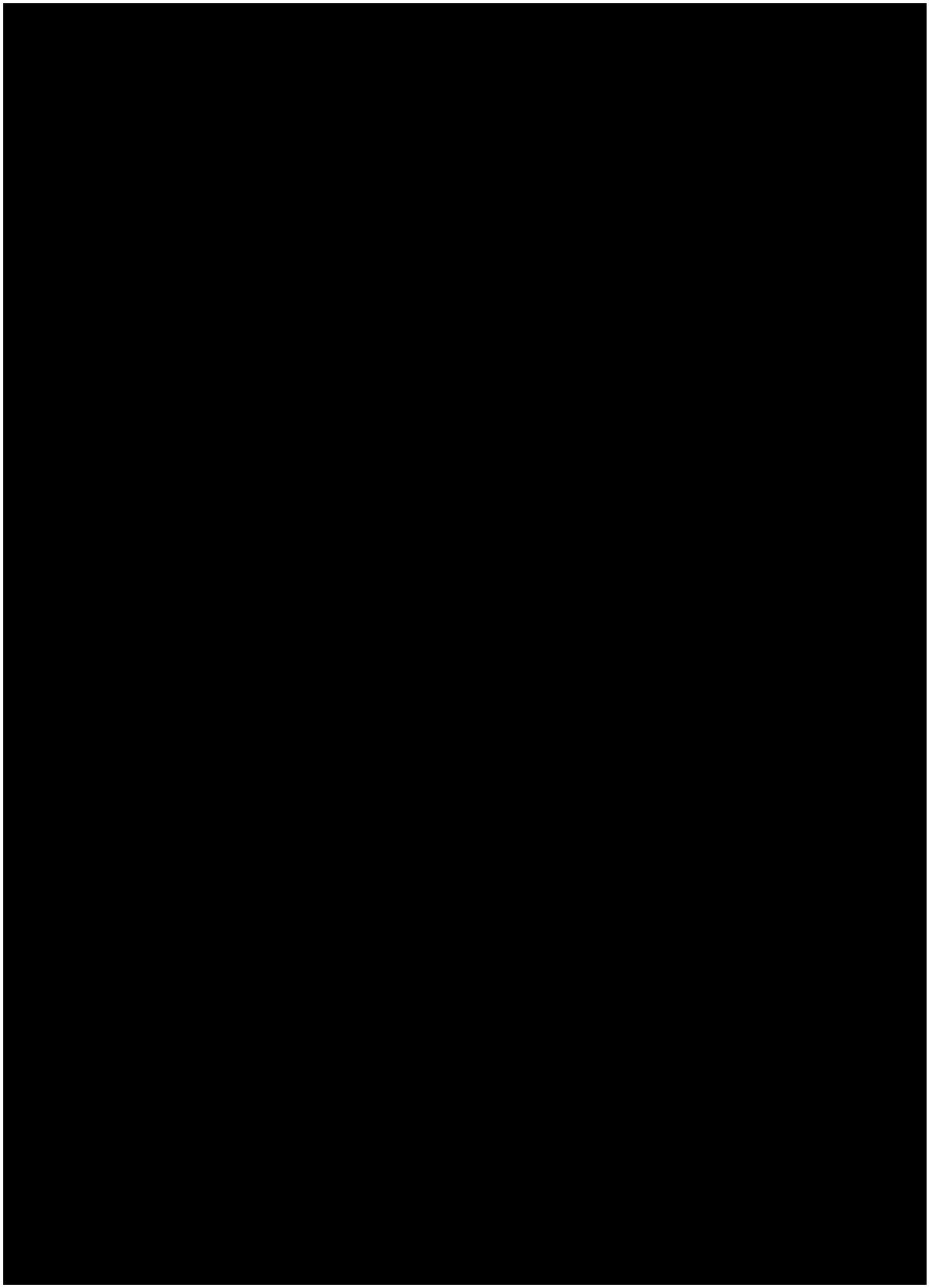
A. I have.

Q. What is this document?

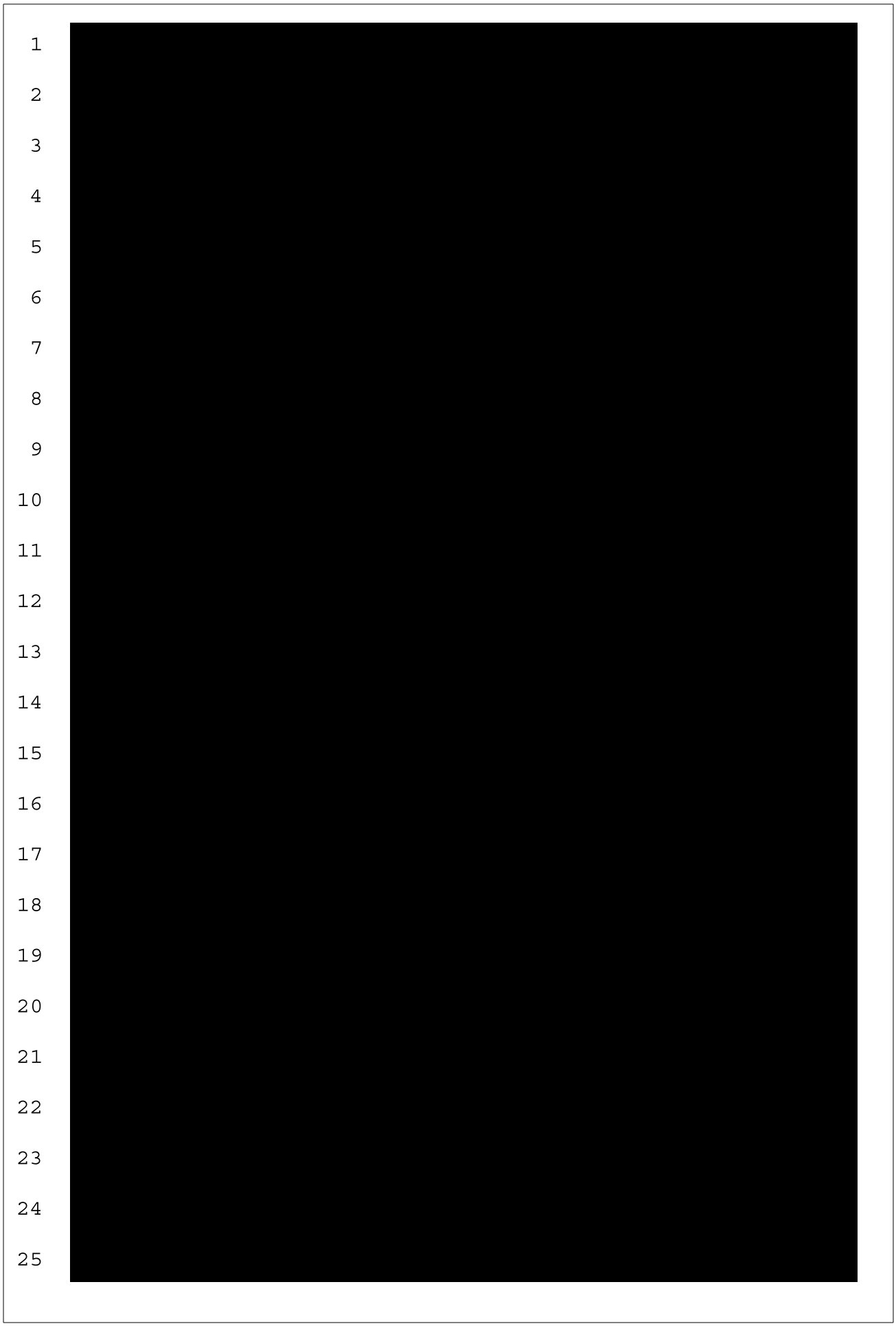
A. It is an e-mail between myself and a few others.

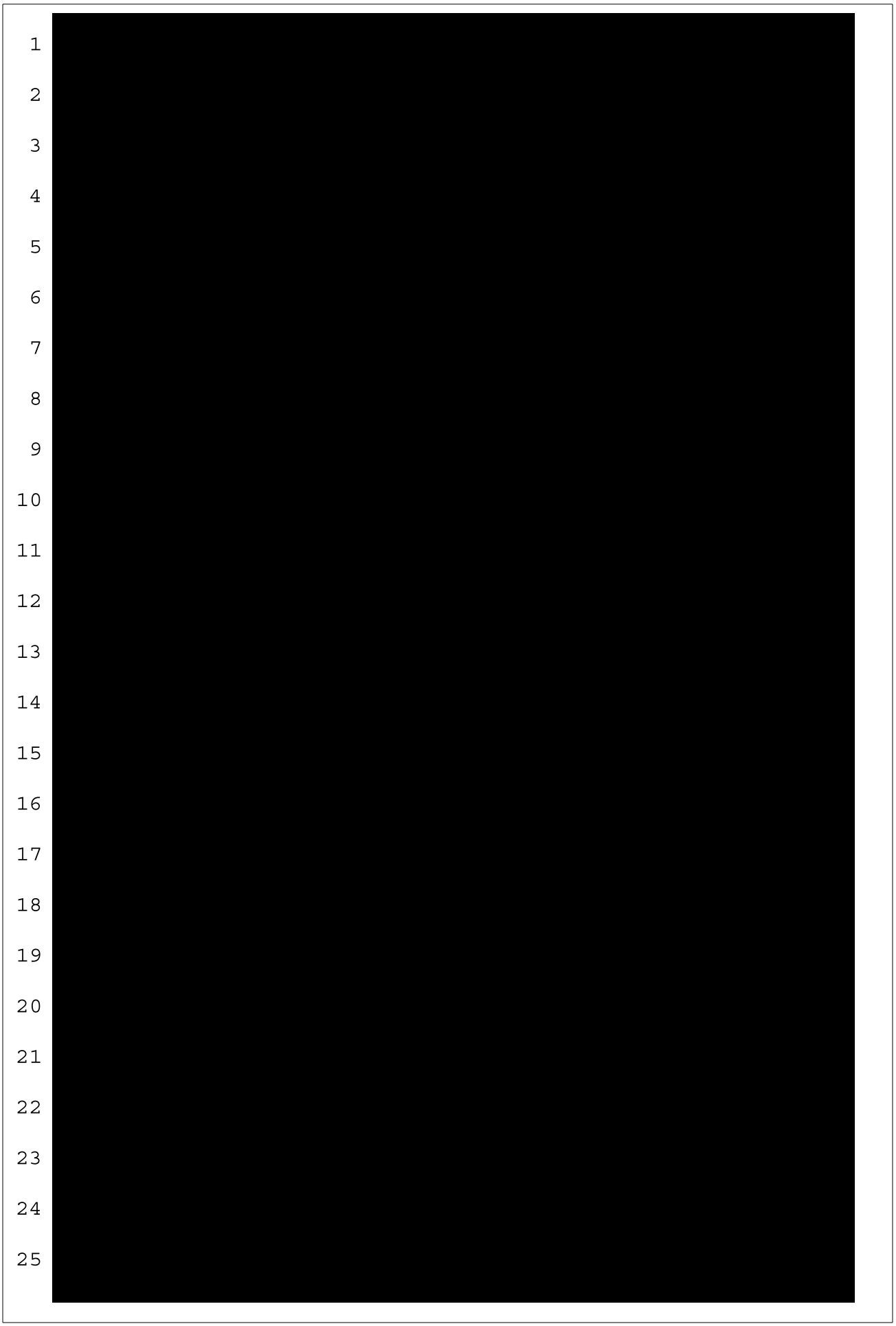
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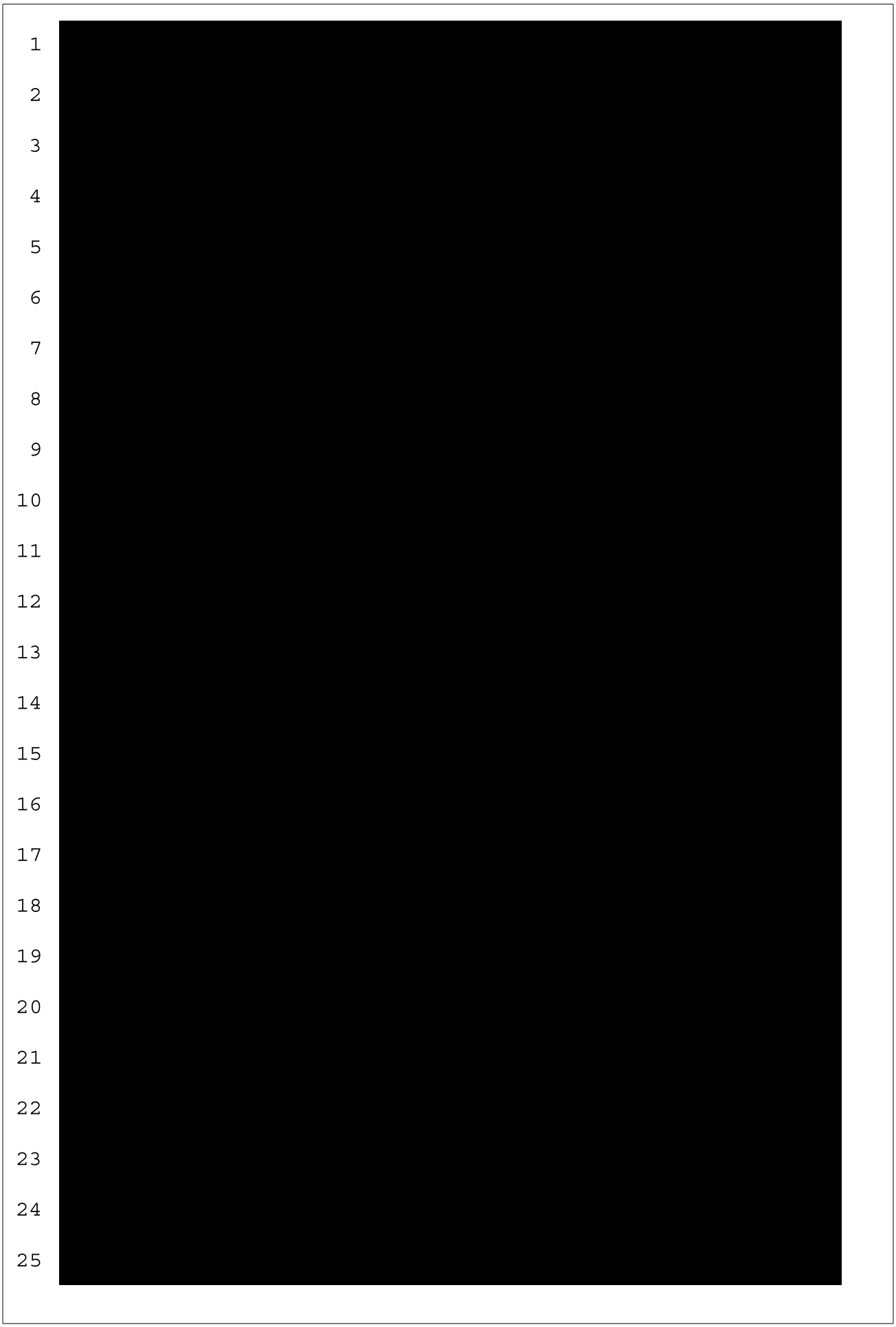




Q. I'm now marking Exhibit 13. It is a two-page document with a Bates number at the bottom of the first page ending in 60012. Do you see that







[redacted]

BY MR. FOX CAHN:

Q. I'm now marking Exhibit 16, which should be available to you on the online platform. And it is an e-mail with a Bates number ending in 80527 at the bottom of the seventh page.

MS. MENALDO: Mr. Cahn, I've just realized that we've been on the record for a little over an hour. So maybe after this line of questioning, we could take another short break.

MR. FOX CAHN: Sure thing.

THE WITNESS: Okay, I do see that document.

BY MR. FOX CAHN:

Q. And do you recognize this document?

A. I do.

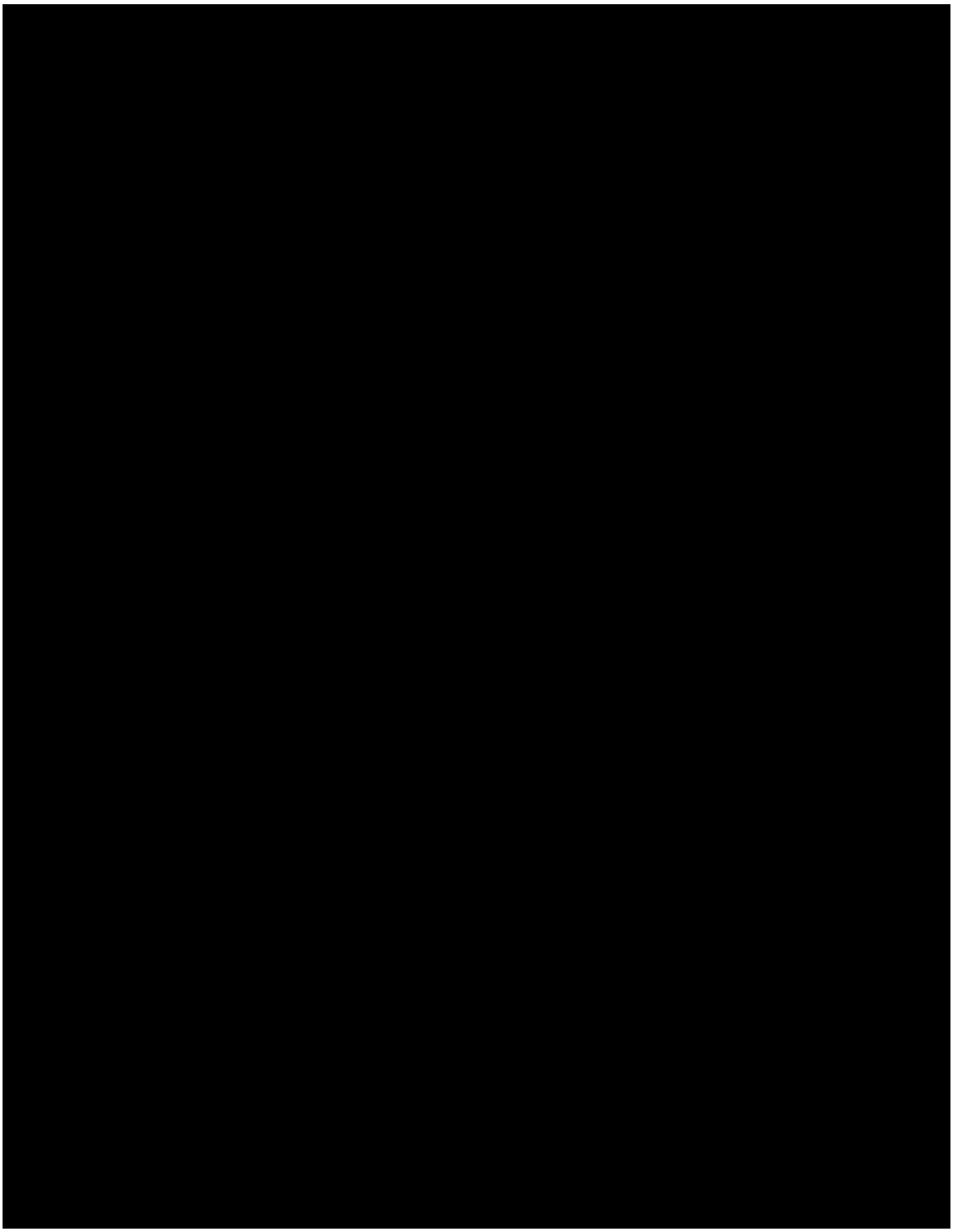
Q. What is it?

[redacted]

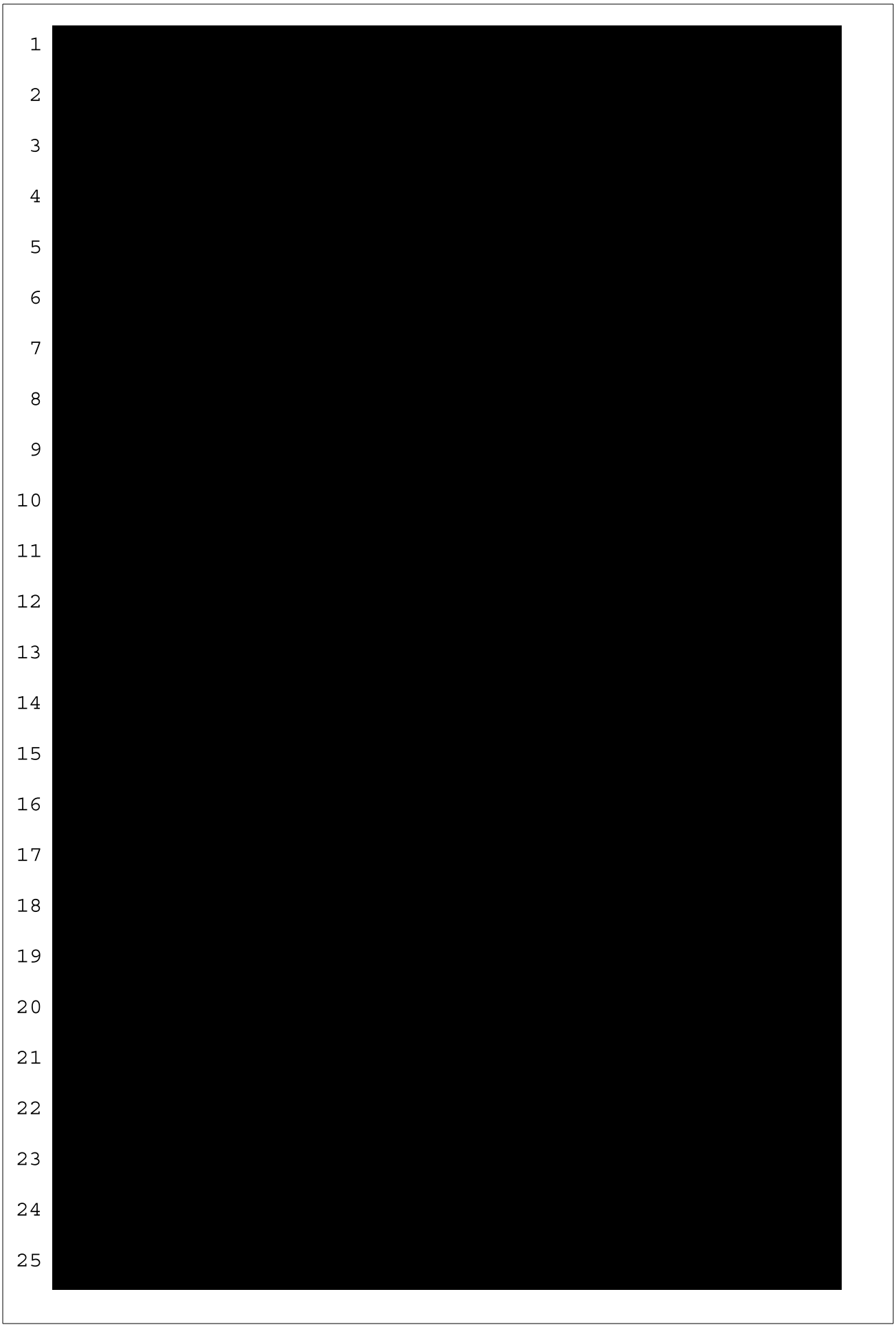
A. Let me review it first.

Q. And Mr. Fox, I'll just be asking you one question about the e-mail on page 7.

A. Hold on one second, still. Okay.



MR. FOX CAHN: All right. Well, why





Q. And since Thomson Reuters has data on nearly all consumers as part of CLEAR, we understand that there are some consumers who seek to access their data; is that correct?

A. Per our privacy policy, consumers can make a request of Thomson Reuters to see what data Thomson Reuters has about them.

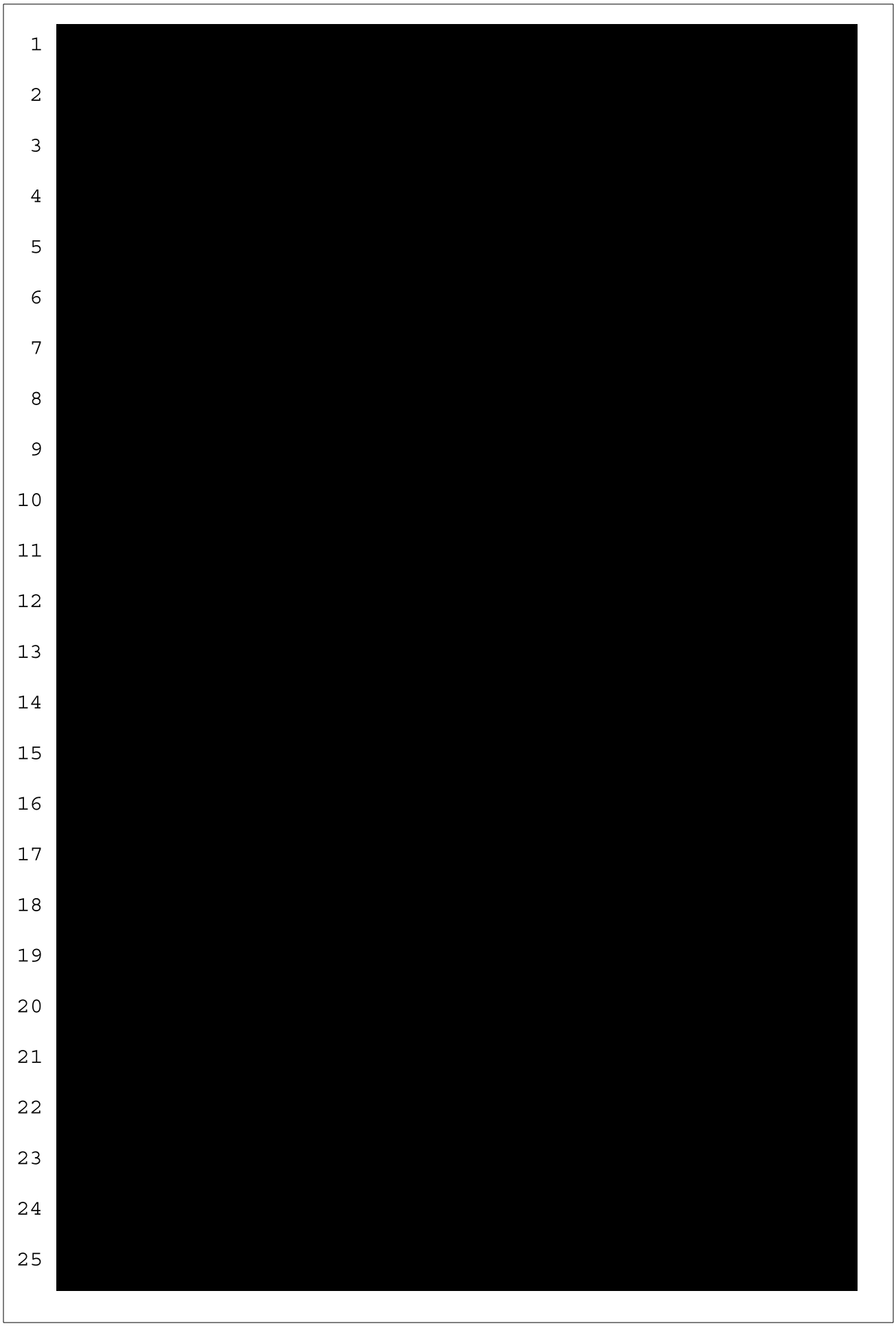
Q. And consumers can request that Thomson Reuters correct information about them; correct?

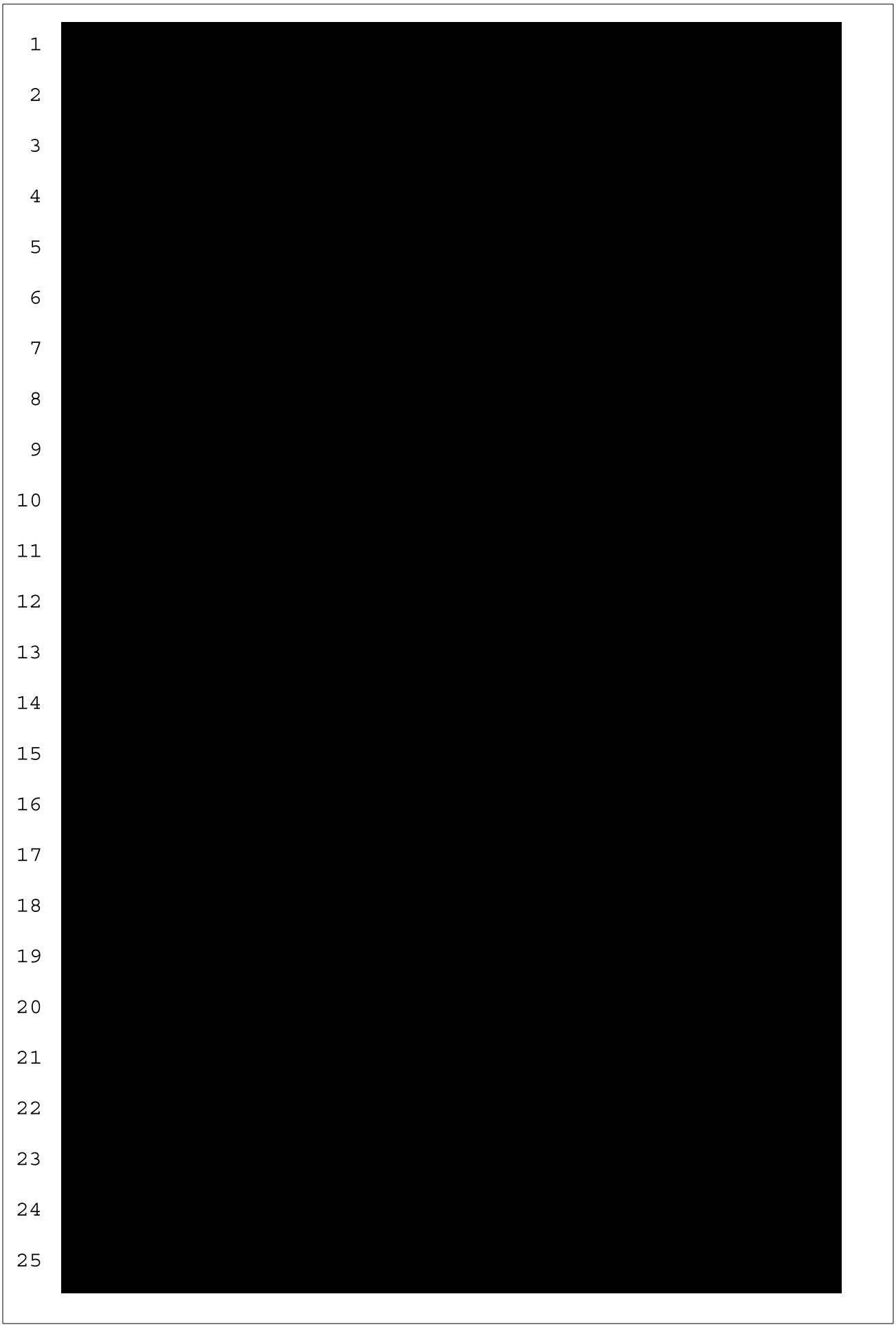
A. Per the privacy laws in specific states, that is correct.

Q. Is one of those states California?

A. To my belief, yes.

Q. I'm now introducing what is being marked as Exhibit 24. It is a document with a Bates number ending in 17559 at the bottom of the first





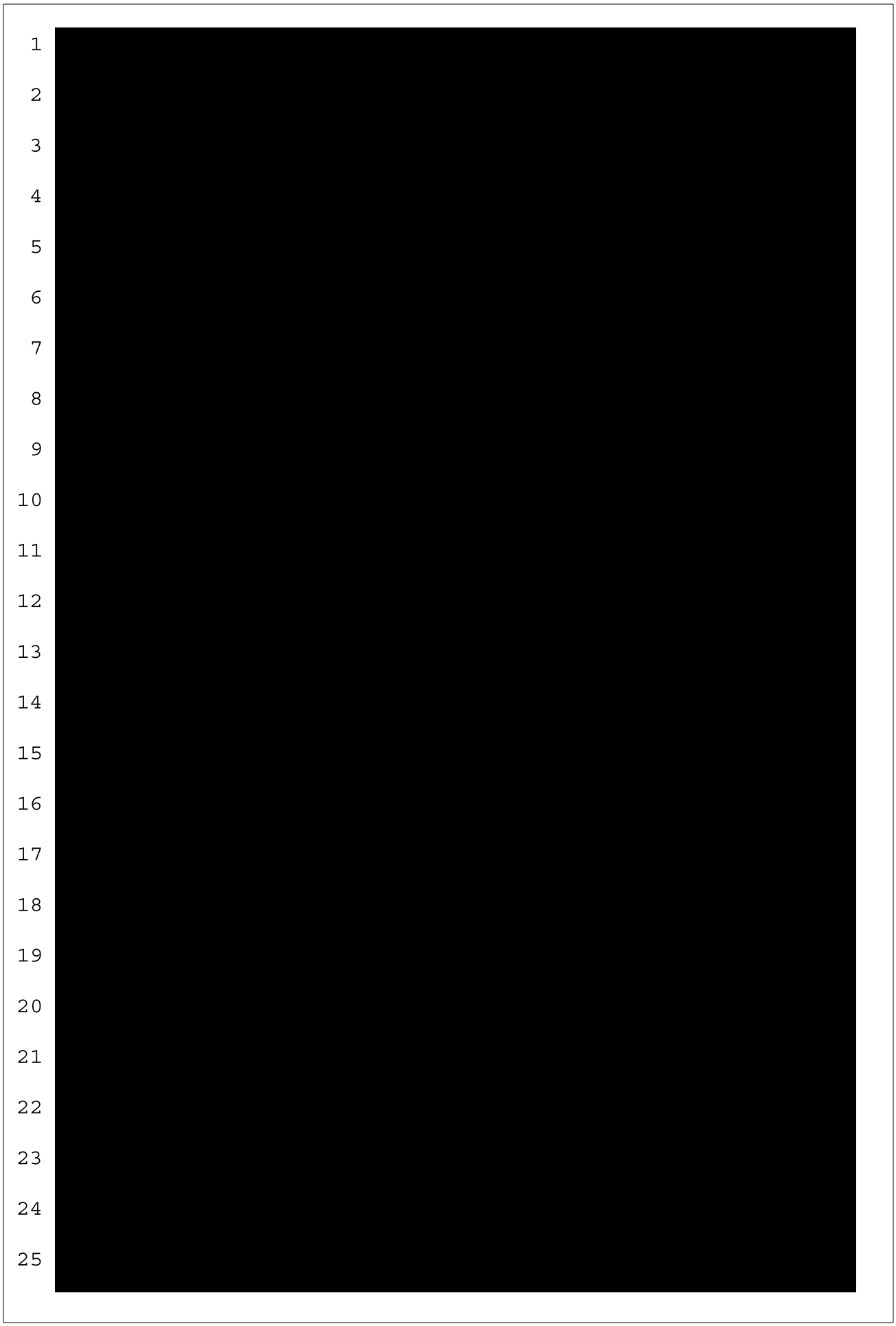
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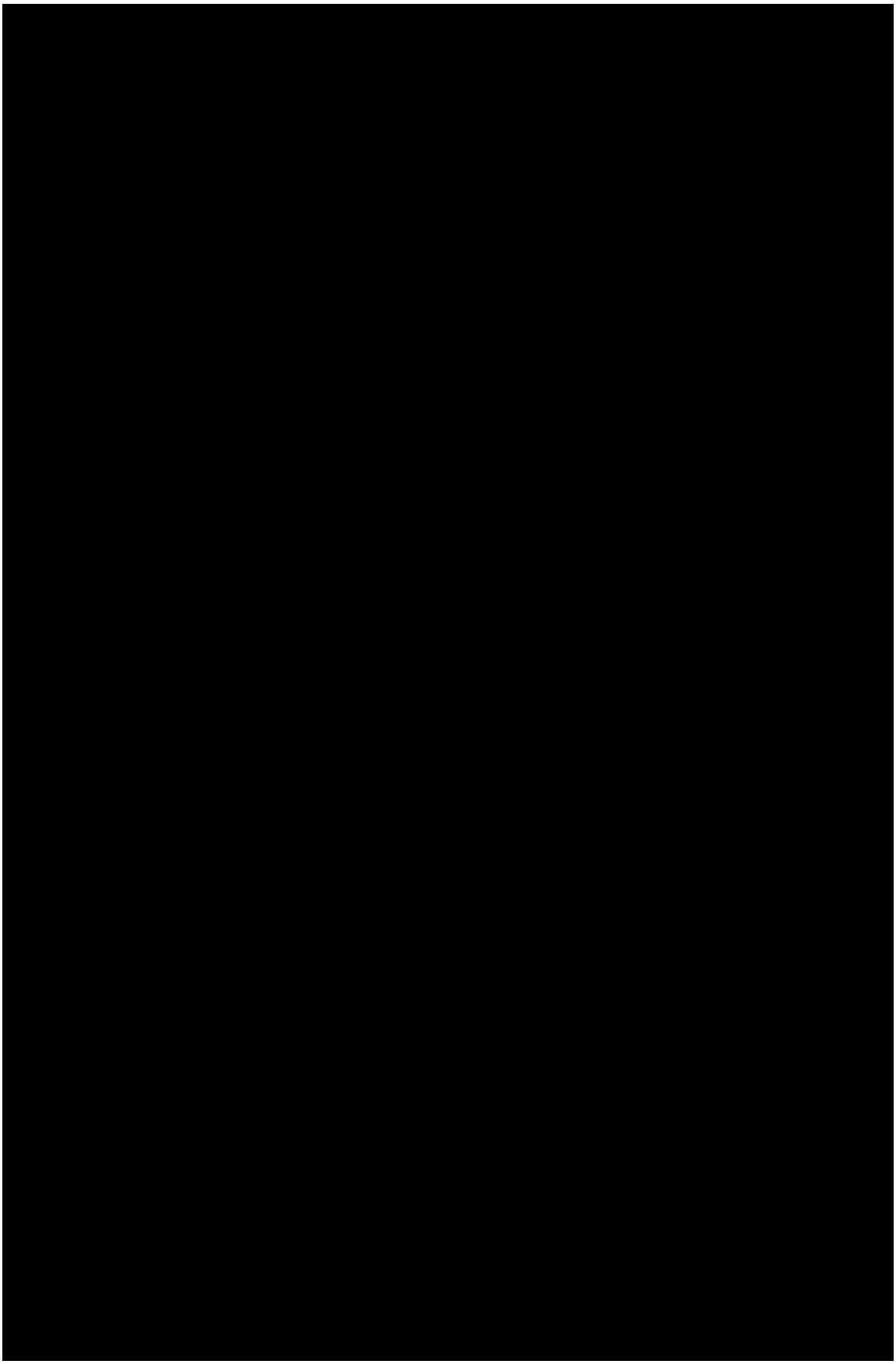
Q. I'm going to now introduce Exhibit 26. It is an e-mail thread with a Bates stamp ending in 40077 on the first page. Apologies, this -- strike that. One moment.

Do you recognize this document that was previously introduced under another exhibit number as well?

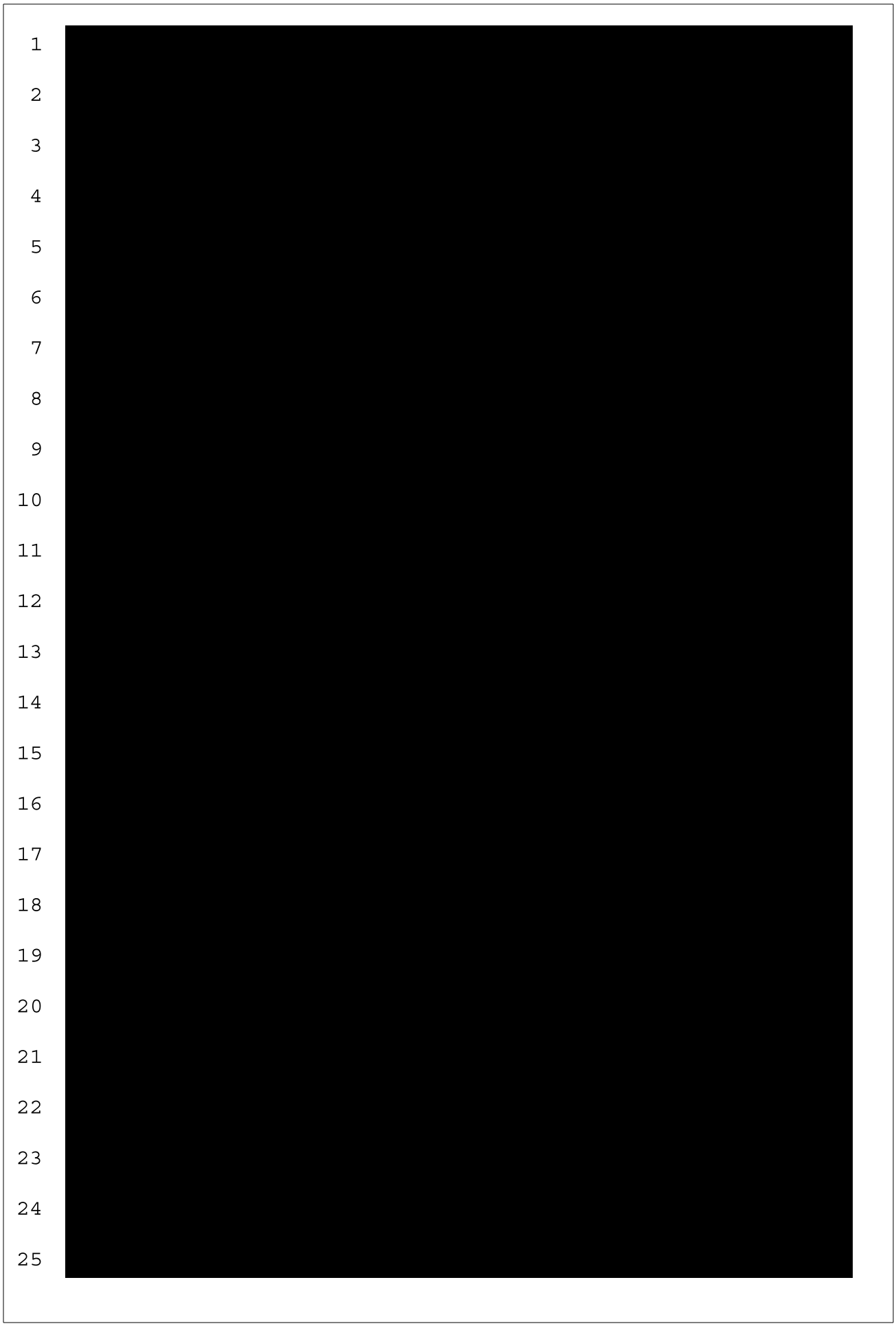
A. Yes, I do recognize it.

[redacted]





BY MR. FOX CAHN:



I, ANITA KORNBURGER, Registered Professional Reporter and Notary Public, do hereby certify that the preceding deposition was recorded by me and reduced to writing under my personal direction.

I further certify that said deposition was taken remotely, with all parties appearing by videoconference, on May 16, 2022, commencing at 10:02 a.m. and concluding at 5:36 p.m.

I further certify that I am not a relative or employee or attorney or counsel of any of the parties, or a relative or employee of such attorney or counsel, or financially interested directly or indirectly in this action.

In witness whereof, I have hereunto set my hand and affixed my seal of office, this 20th day of May, 2022.



ANITA KORNBURGER, RPR - Notary
Commission #1166910800033
My commission expires January 31, 2025.

June 17, 2022

Re: Brooks et al. v. Thomson Reuters Corporation, USDC Northern District of California - San Francisco Division Case No. 3:21-cv-01418-EMC: Defendant's Deposition Errata (Steven Fox Deposition Transcript dated May 16, 2022)

To whom it may concern:

I, Steven Fox, have reviewed the transcript of my deposition in Brooks et al. v. Thomson Reuters Corporation, Case No. 3:21-cv-01418-EMC, taken on May 16, 2022. Attached hereto is a list of errata identified in the deposition transcript.

/s/ Steven Fox
STEVEN FOX

June 17, 2022
DATE

Steven Fox Deposition Errata Sheet

Page:Line(s)	Existing Testimony	Corrected Testimony	Reason
43:22	"...**SCRA**, DPPA, GLB, HIPAA, et cetera."	"..**FCRA**, DPPA, GLB, HIPAA, et cetera."	Transcription error
112:21	"Does not."	"**It** does not."	Transcription error
116:17	"…again, based on previous testimony, usually by **FDP**,…"	"…again, based on previous testimony, usually by **FTP**,…"	Transcription error