

EXHIBIT 6

(Redacted)

CONFIDENTIAL PAUL GODLEWSKI

1 UNITED STATES DISTRICT COURT FOR THE
2 NORTHERN DISTRICT OF CALIFORNIA
3 SAN FRANCISCO DIVISION
4 * * * * *
5 CAT BROOKS and RASHEED SHABAZZ, individually
and on behalf of all others similarly situated,

6
Plaintiffs,

7
vs. Case No. 3:21-cv-1418-EMC

8
THOMSON REUTERS CORPORATION,

9
Defendant.

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* * * * *

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***** CONFIDENTIAL *****

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13 REMOTE VIDEOTAPED DEPOSITION OF PAUL GODLEWSKI

14
May 6, 2022
15 10:00 a.m. to 6:36 p.m.
16 REPORTED BY ANITA KORNBURGER
REGISTERED PROFESSIONAL REPORTER

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***** CONFIDENTIAL *****

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1 A P P E A R A N C E S

2 GIBBS LAW GROUP LLP, by
Mr. Ezekiel S. Wald
3 Mr. Andre Mura
Mr. Mark Troutman
4 1111 Broadway, Suite 2100
Oakland, California 94607
5 510-350-9700
zsw@classlawgroup.com
6 Appearing by videoconference on behalf of the
Plaintiffs.

7
SURVEILLANCE TECHNOLOGY
8 OVERSIGHT PROJECT, by
Mr. Albert Fox Cahn (pro hac vice)
9 40 Rector Street, 9th Floor
New York, NY 10006
10 albert@stopspying.org
Appearing by videoconference on behalf of the
11 Plaintiffs.

12 PERKINS COIE LLP, by
Ms. Susan Fahringer
13 Ms. Nicola Menaldo
Mr. Hayden Schottlaender
14 1201 Third Avenue, Suite 4900
Seattle, Washington 98101-3099
15 sfahringer@perkinscoie.com
Appearing by videoconference on behalf of the
16 Defendant.

17 ALSO PRESENT: Jon Olson - Thomson Reuters

18

I N D E X

19

20 Examination by Page
21 Mr. Wald. 6
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1 Q. Was it in the last year?

2 A. I would assume, based on the most recent
3 date that I can see.

4 Q. The current position at the top under
5 Progressive Career Path says 2021. Is that still
6 your position today?

7 A. No.

8 Q. What is your position today?

9 A. Senior director of marketing, outbound
10 product marketing.

11 Q. On the top of this document, under your
12 name, it has your work e-mail and then it has a
13 phone number. Is that your work phone number?

14 A. That's my personal number.

15 Q. Your personal number. And then next to
16 your personal number there's a black box. It looks
17 like something was crossed out. Do you know what
18 was crossed out?

19 A. I can't recall.

20 Q. Did you cross it out?

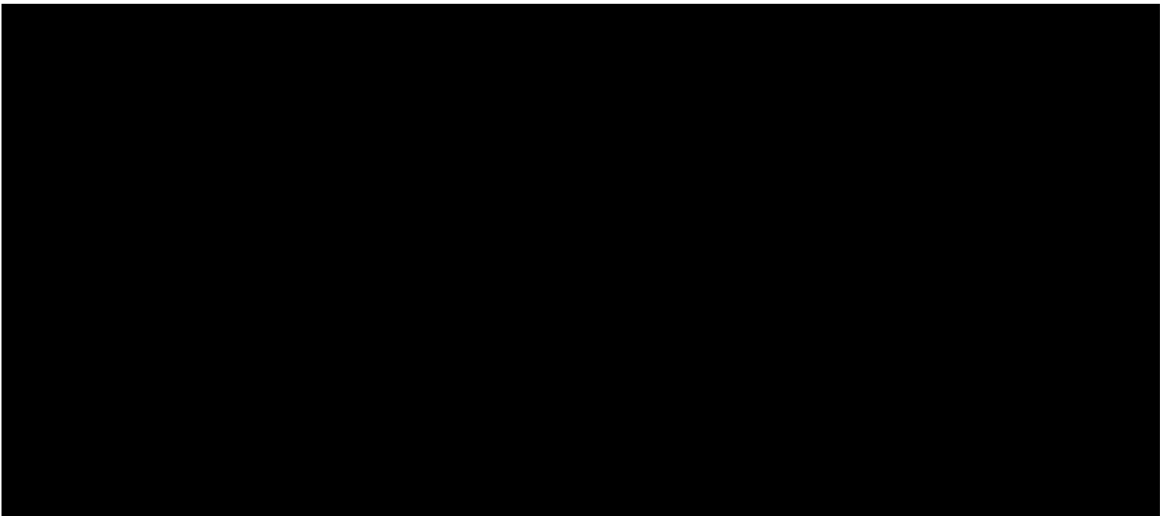
21 A. No.

22 Q. Did you ask for it to be crossed out?

23 A. No.

24 Q. Does it look to you like it might be an
25 address?

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Q. It also says here you drove the go to market launch for Abogado.com; is that right?

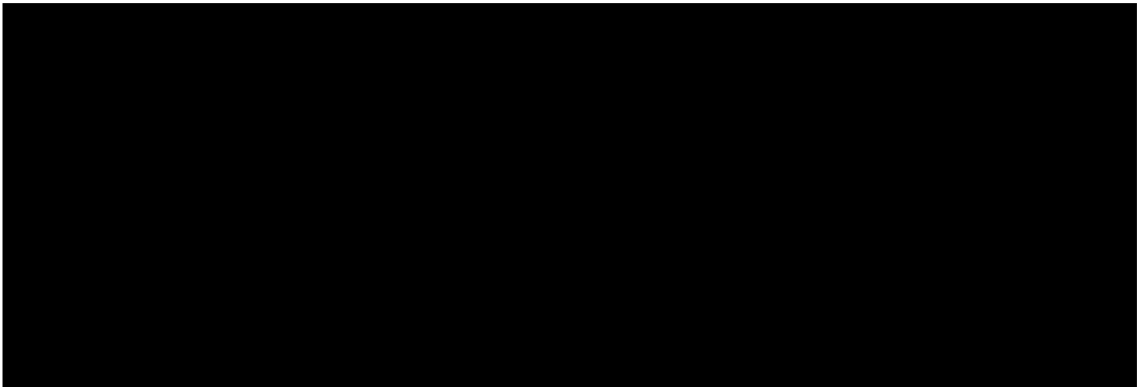
A. Yes.

Q. Does CLEAR work with international companies?

A. No. But I'm curious as to why you asked about Abogado.com and then back to CLEAR.

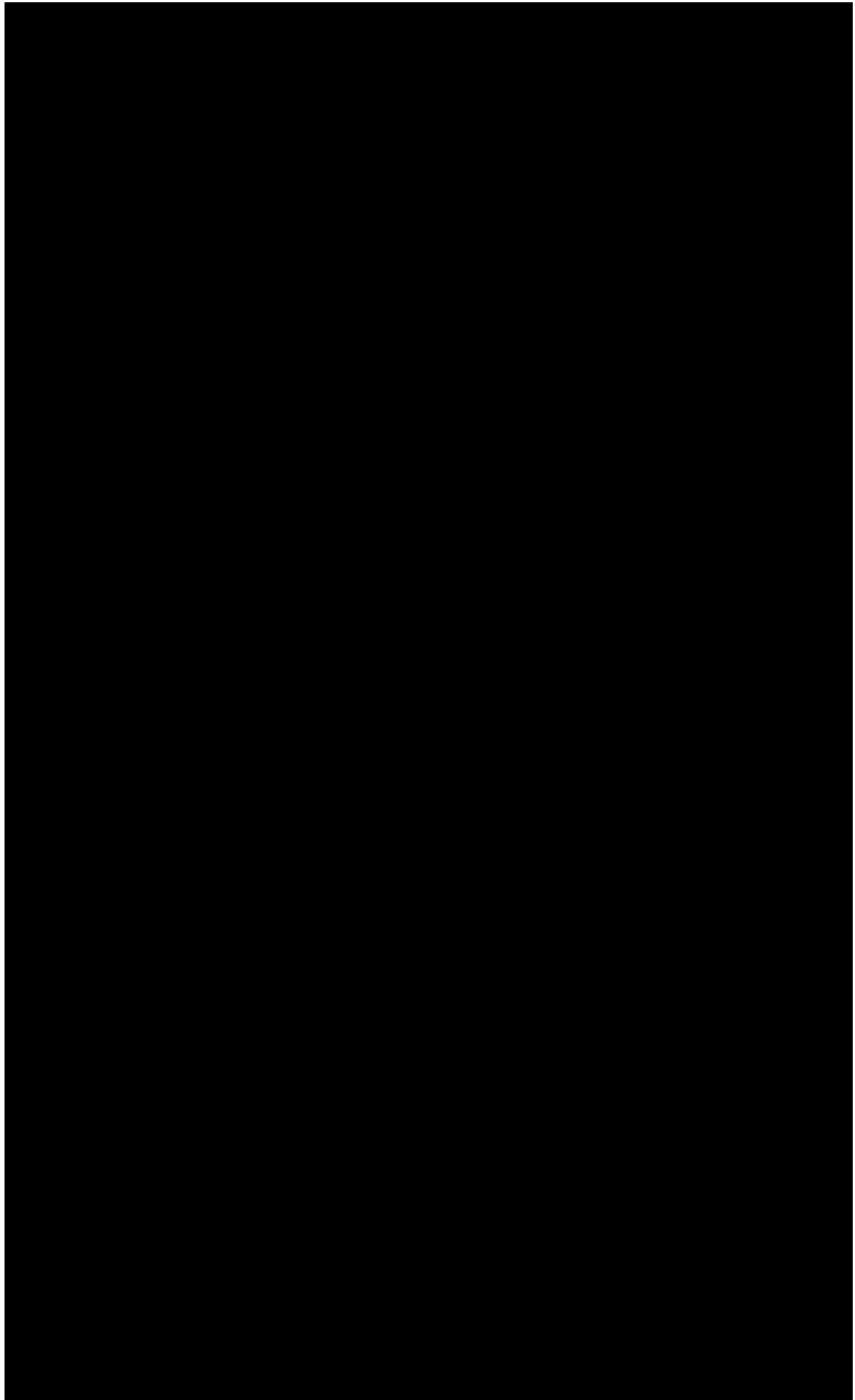
Q. It looks here like you work with some relationships with organizations that might focus on customer groups that could include non-United States residents; is that right?

A. Abogado.com is a FindLaw-related solution. It has nothing to do with CLEAR.



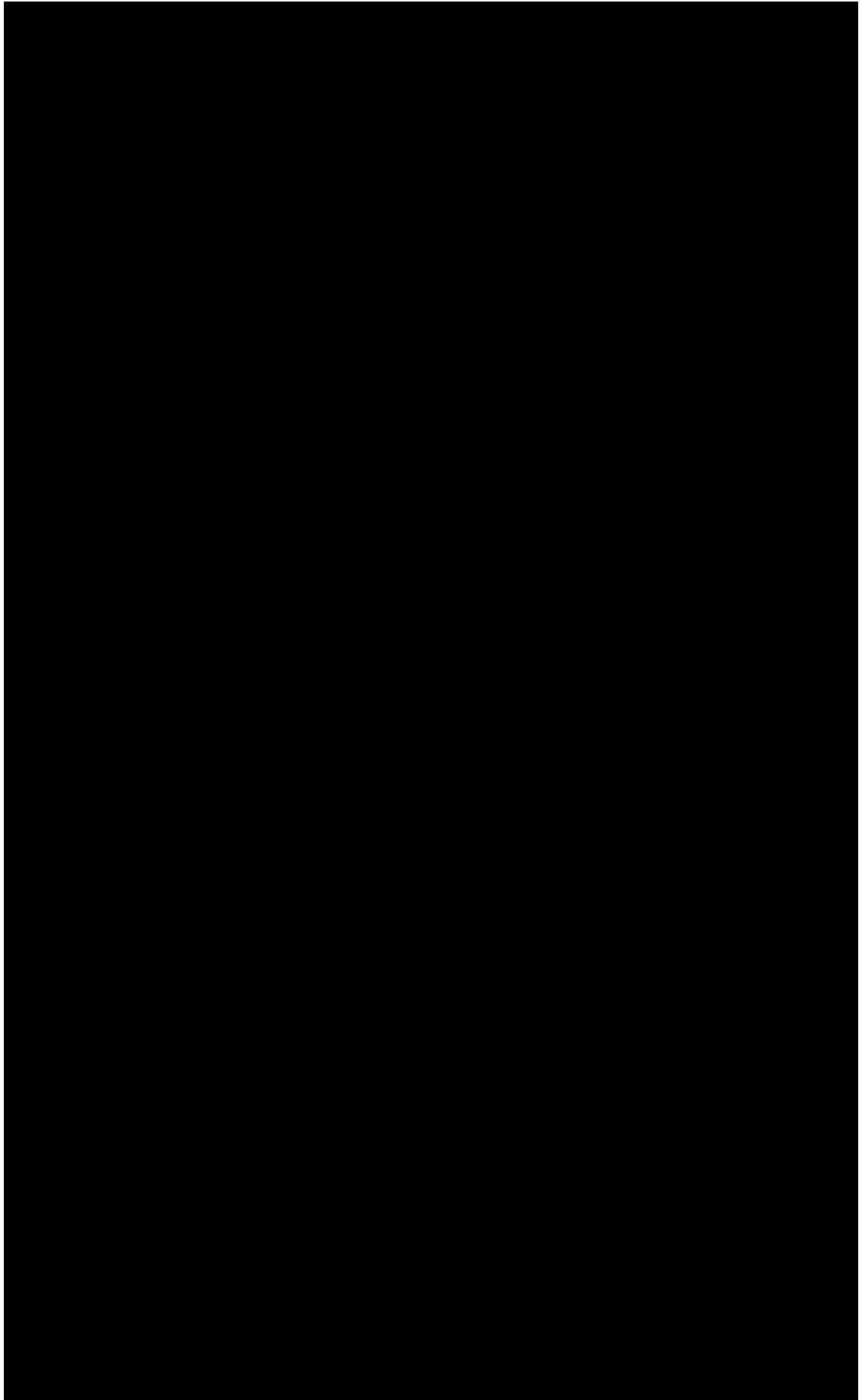
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[REDACTED]

MR. WALD: We can take down plaintiff's
exhibit, please.

BY MR. WALD:

[REDACTED]

1 A. Yes.

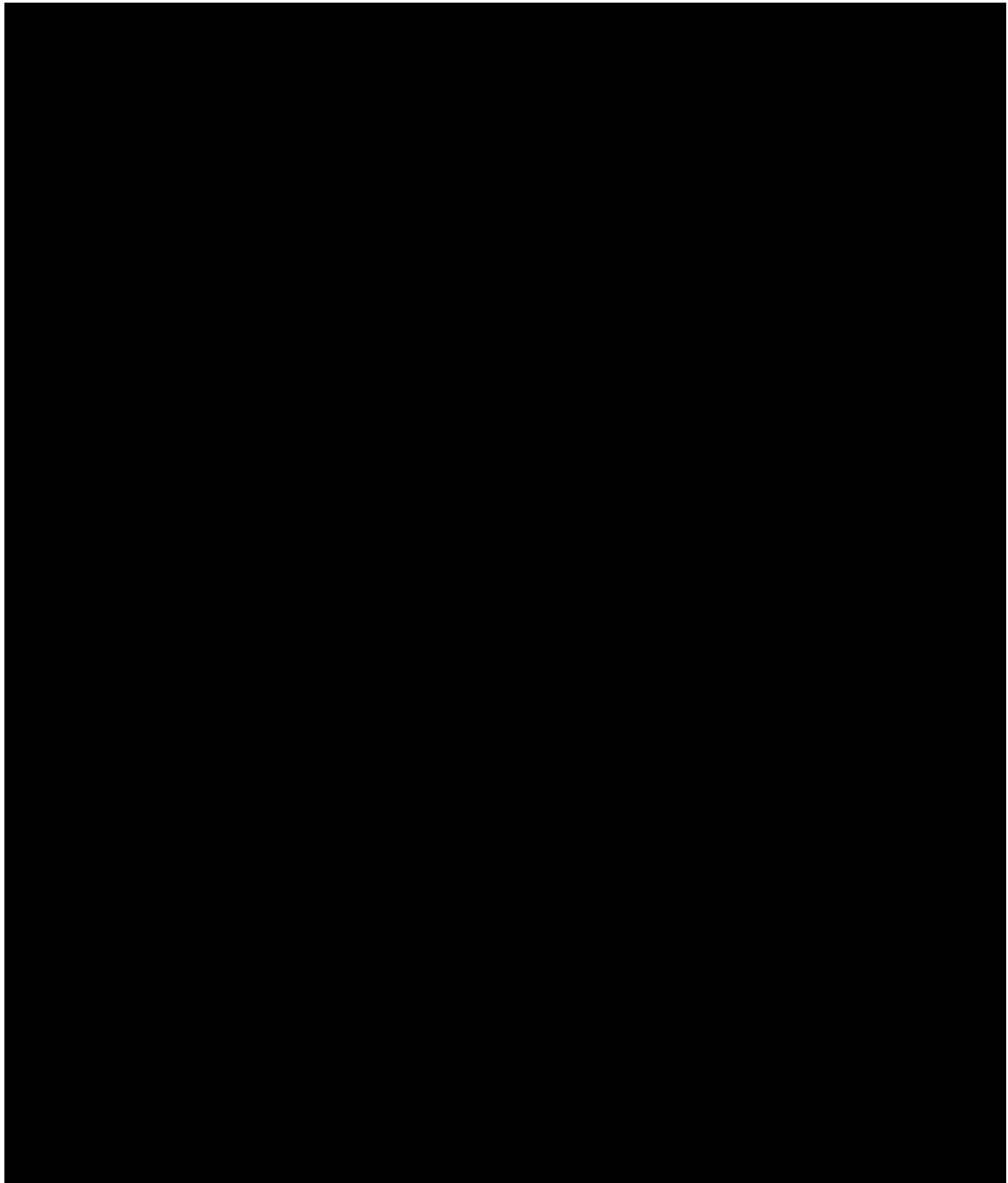
2 Q. Did you speak with your counsel about
3 your testimony today?

4 A. No.

5 Q. Did you speak with anyone else during the
6 break?

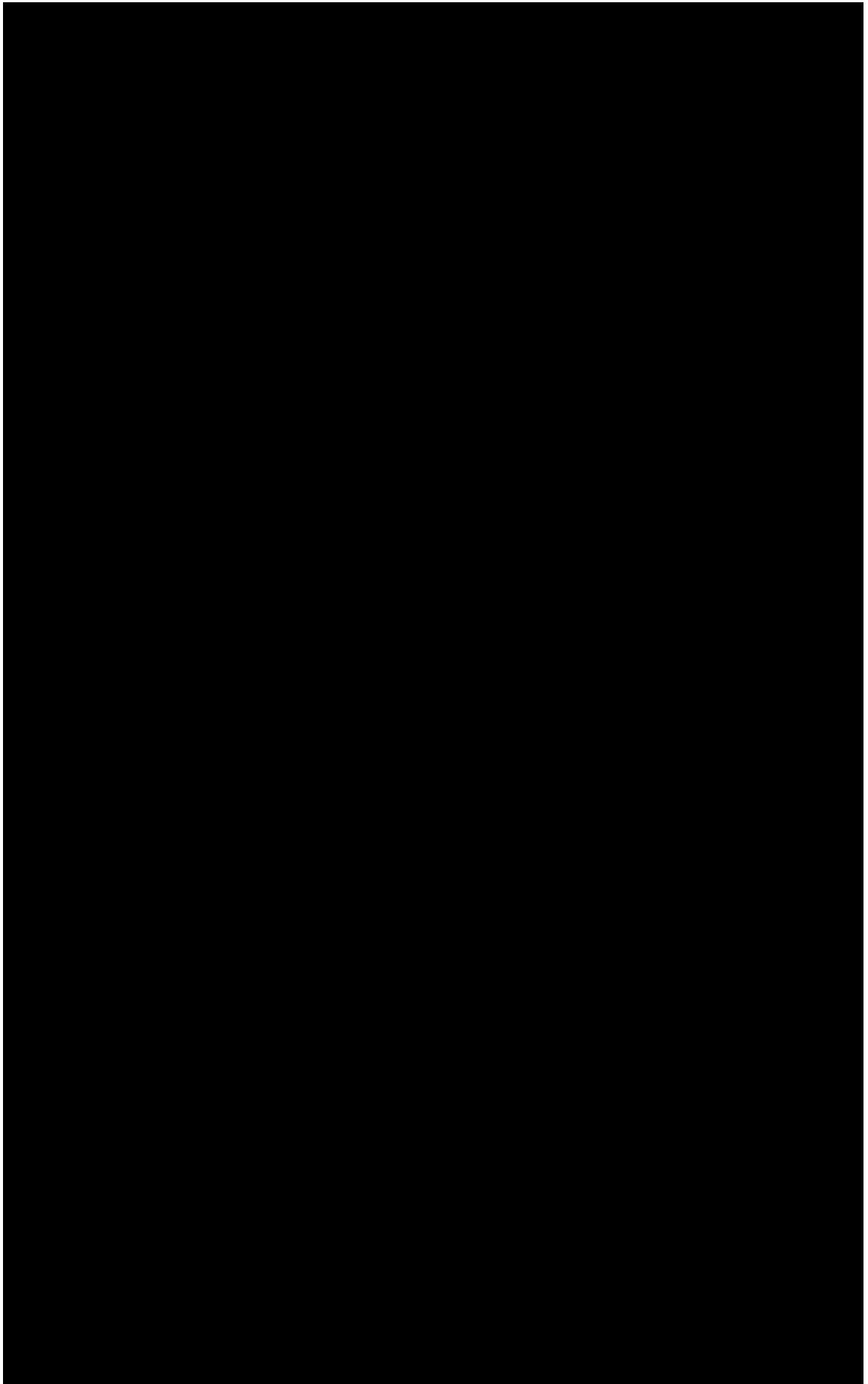
7 A. No.

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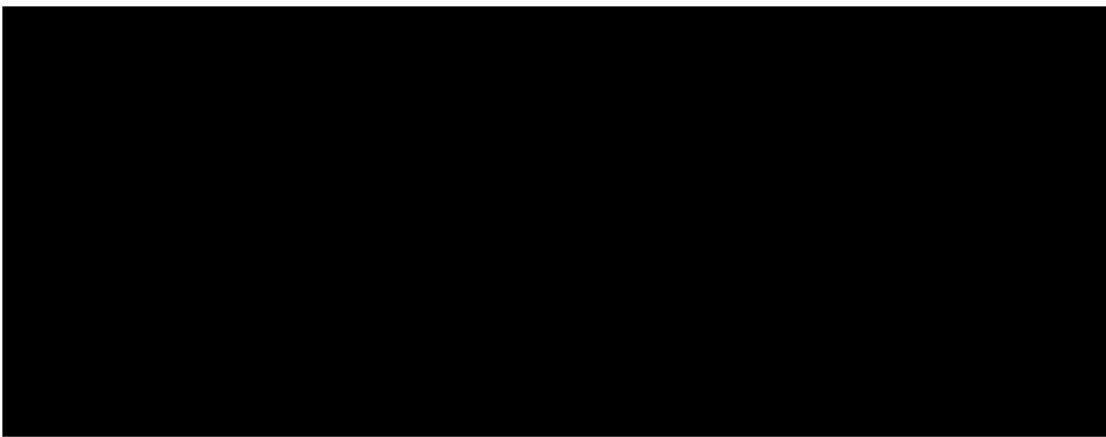


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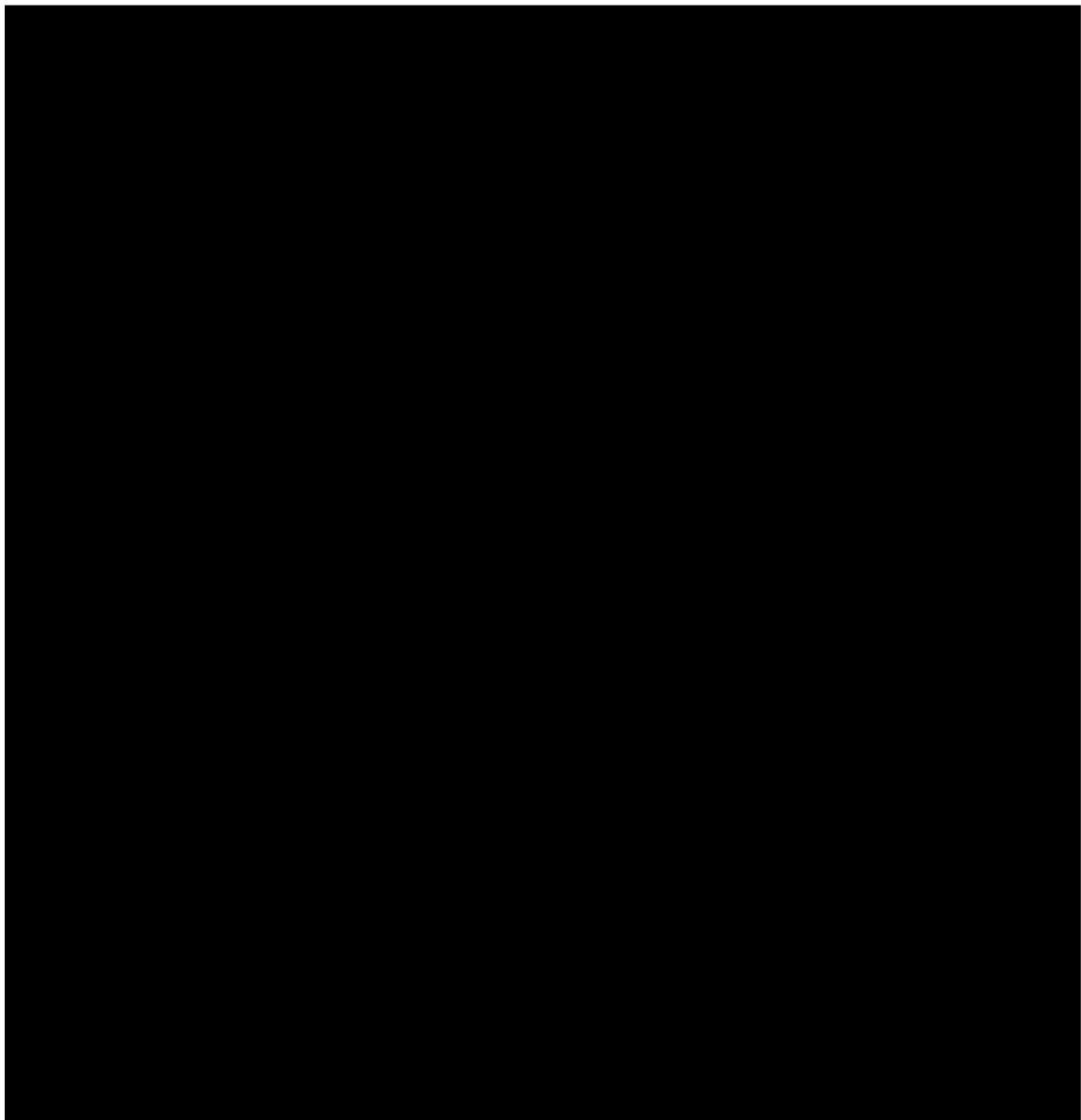


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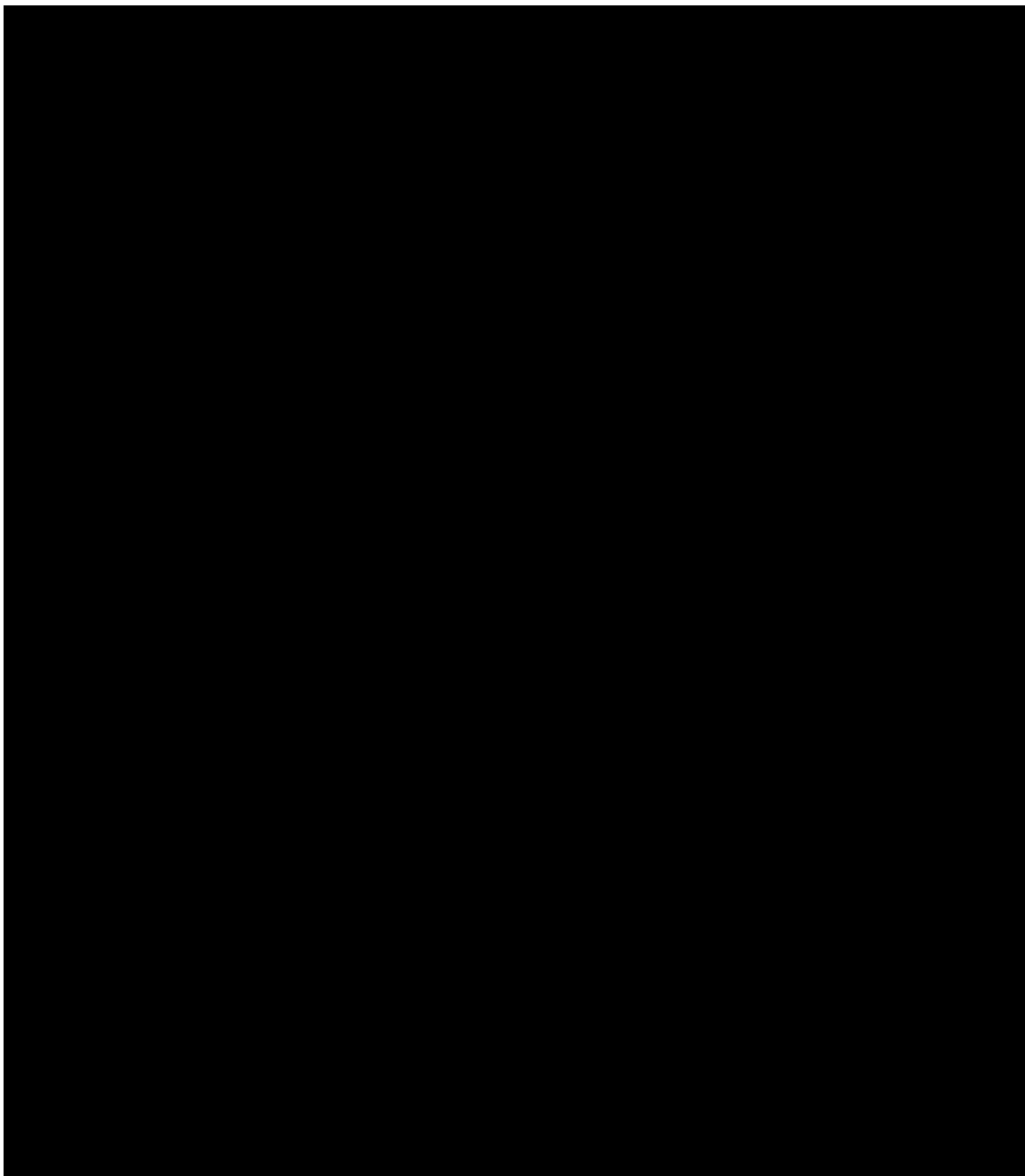


MR. WALD: We can take down plaintiff's
Exhibit 16.

BY MR. WALD:



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19 BY MR. WALD:

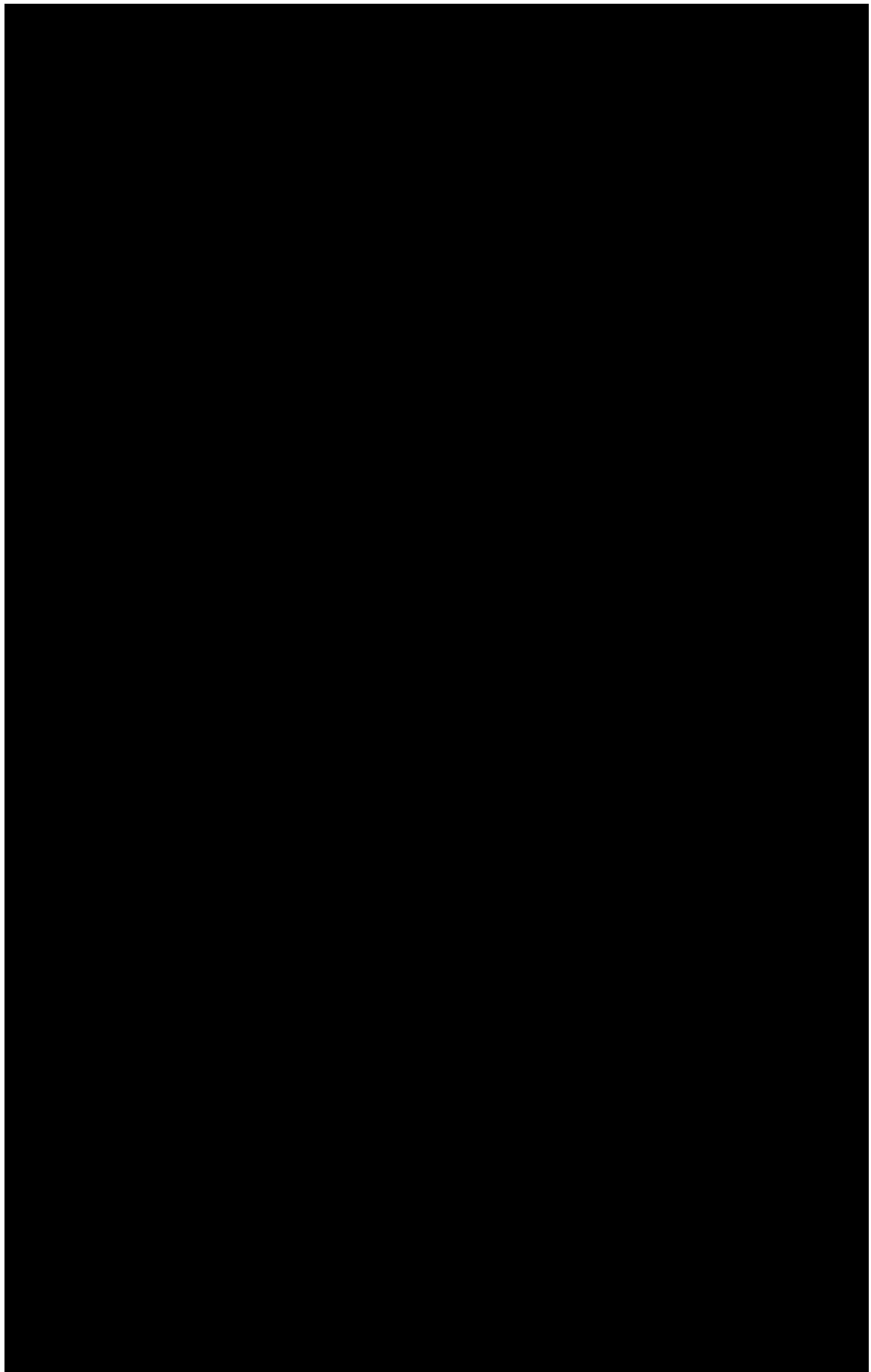
20 Q. I'll strike the question.

21 Plaintiffs will introduce as
22 Exhibit 17 a document labeled TR_BROOKS060007.
23 That document is now available in your folder. And
24 please let me know when you're able to open it.

25 A. Okay, I have it open.

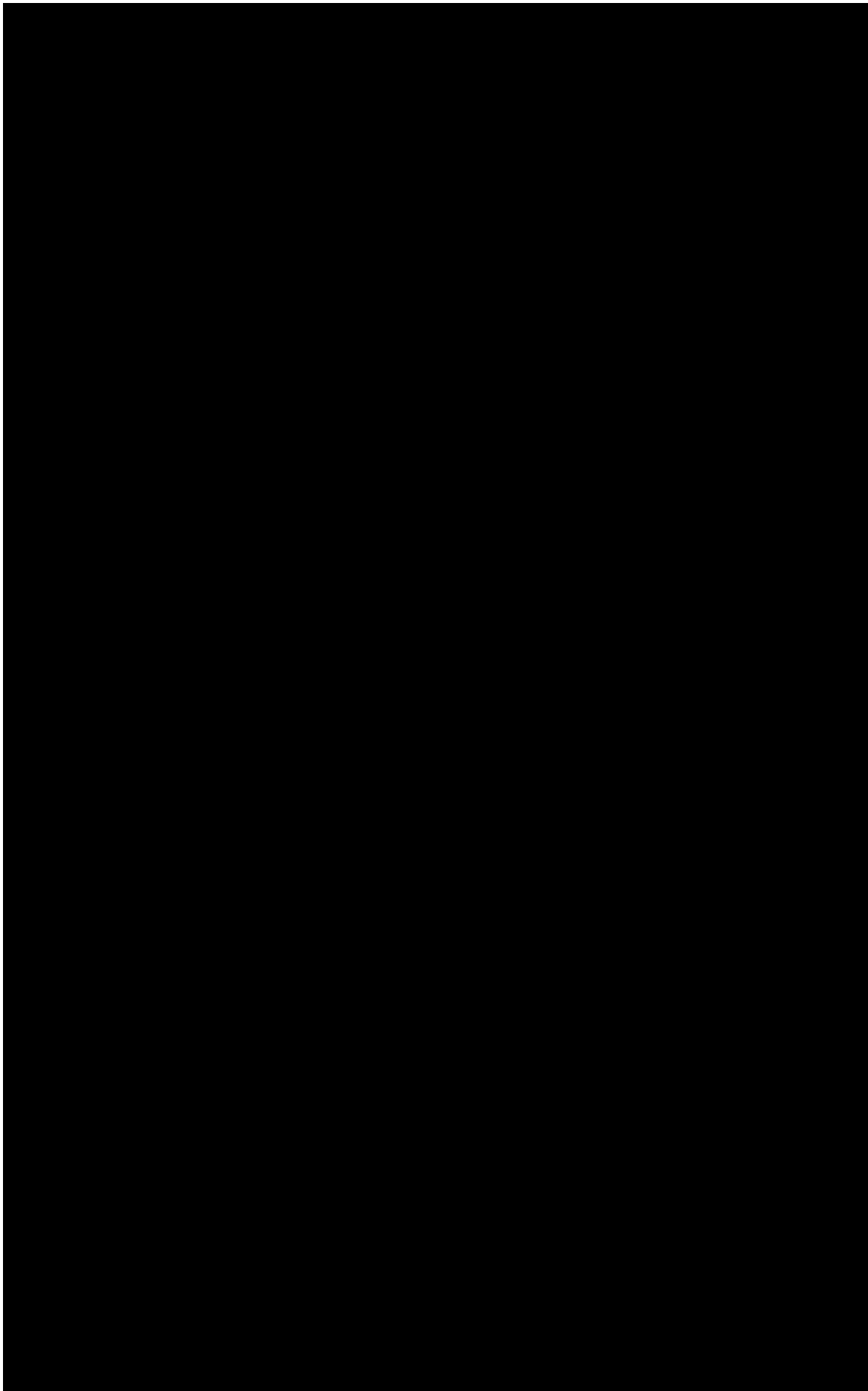
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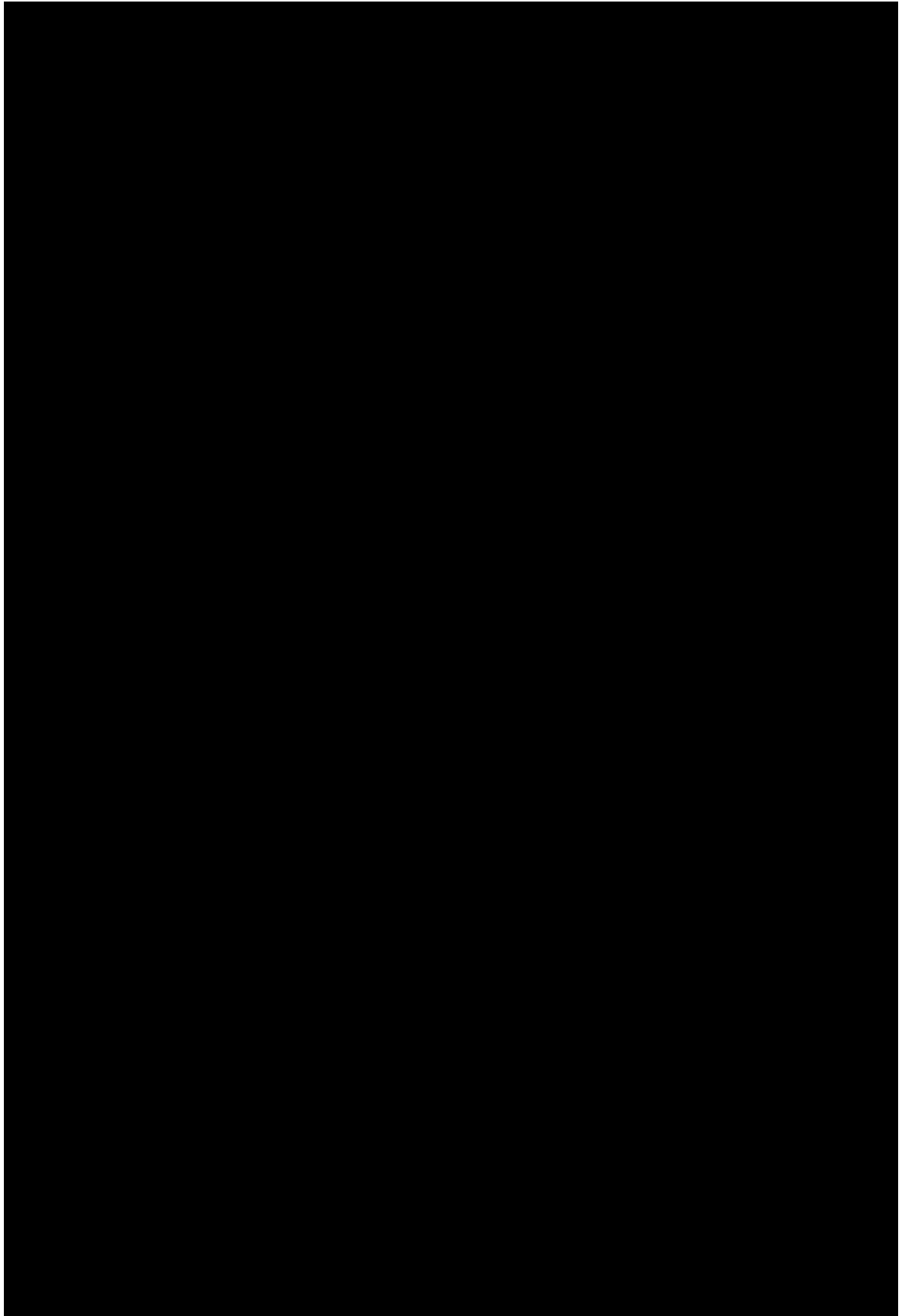
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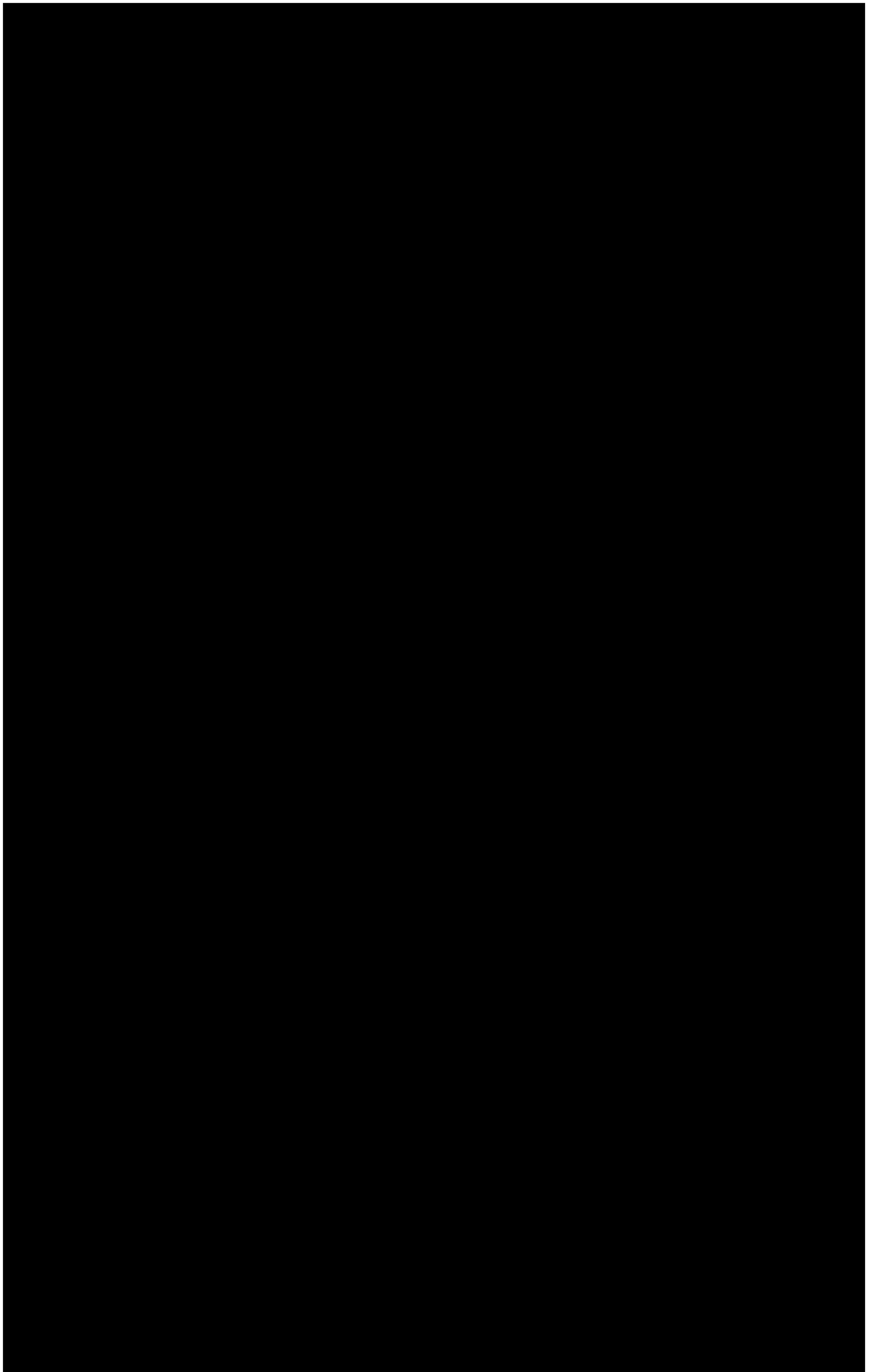
1 A. Again, I'm not recognizing the document,
2 but I have seen documents like this before.

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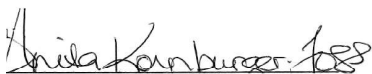
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I, ANITA KORNBURGER, Registered Professional Reporter and Notary Public, do hereby certify that the preceding deposition was recorded by me and reduced to writing under my personal direction.

I further certify that said deposition was taken remotely, with all parties appearing by videoconference, on May 6, 2022, commencing at 10:00 a.m. and concluding at 6:36 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 at this 11th day of May, 2022.



ANITA KORNBURGER, RPR - Notary

Commission #1166910800033

My commission expires January 31, 2025.

June 10, 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 (Paul Godlewski Deposition Transcript dated May 6, 2022)**

To whom it may concern:

I, Paul Godlewski, 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 6, 2022. Attached hereto is a list of errata identified in the deposition transcript.

Paul F. Godlewski

PAUL GODLEWSKI

6/10/2022

DATE

Godlewski Deposition Errata Sheet

Page : Line(s)	Existing Testimony	Corrected Testimony	Reason
30:21	“Basic, and as I alluded to earlier in my. . .”	“Basically, and as I alluded to earlier in my. . .”	Transcription error
33:6	“ . . . we are faced with so that, yes, Thomson Reuters. . .”	“ . . . they are faced with so that, yes, Thomson Reuters. . .”	Transcription error
43:7	“I’m sorry.”	“I’m sorry, I can’t recall.”	Transcription error
63:21, 63:25, 64:10, 64:13-14	“John Koske” / “John McKoske”	“John Koski”	Transcription error
68:21	“ . . .access to that product as a marketer. . .”	“ . . .access to that process as a marketer. . .”	Transcription error
71:22	“ . . .but I’d to look at it in detail to answer specific. . .”	“ . . .but I’d like to look at it in detail to answer specific. . .”	Transcription error
100:6	“Judge Tens”	“Judge Chen’s”	Transcription error
126:19	“ . . .a cell sheet of sorts. . .”	“ . . .a sellsheet of sorts. . .”	Transcription error
175:12	“ . . .I do not train.”	“ . . .I do not train customers.”	Transcription error
182:23-24	“Well, Brook Martin, but he works for Kevin Appold.”	Strike sentence: “Well, Brook Martin, but he works for Kevin Appold.”	Transcription error with no known substitution.