EXHIBIT 7

(Redacted)

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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 RESPONSES 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, hereby responds pursuant to Rule 33 of the Federal Rules of Civil Procedure to Plaintiffs' First Set of Interrogatories to Defendant ("Interrogatories"). Thomson Reuters' responses and objections ("Responses") 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 supplement or amend these Responses should additional information become available through the discovery process or otherwise.

OBJECTIONS TO DEFINITIONS AND INSTRUCTIONS

1. Thomson Reuters objects to all "Definitions" and "Instructions" to the extent they seek to impose obligations exceeding or differing from the requirements of the Federal Rules of Civil Procedure and Local Rules.

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, including 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," which does not align to California residency and requires a legal conclusion as to "class period," on the grounds that it is vague and not proportional to the needs of the case.

GENERAL OBJECTIONS

1. Thomson Reuters objects to the Interrogatories to the extent they seek information that is protected by the attorney-client privilege, the attorney work-product doctrine, or similar protections available under federal or state statutory, constitutional, or common law.

2. Thomson Reuters objects to the Interrogatories to the extent they seek information that is not in Thomson Reuters' possession, custody, or control.

3. Thomson Reuters objects to the Interrogatories to the extent they seek information regarding "CLEAR" without defining that term. Thomson Reuters understands "CLEAR" to refer

to the software product that is referred to as such throughout the Complaint, including in its paragraphs 2–3, 11, and 14–15.

RESPONSES 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.

RESPONSE 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").

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.

RESPONSE 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.

INTERROGATORY NO. 3:

For each category of content responsive to Interrogatory No. 1, identify all purposes for which a user has accessed information through CLEAR, whether or not permitted by the Terms of Use or Terms of Service, delineated by categories of content responsive to Interrogatory No. 1 and categories of customer responsive to RFP 10 (Your response to RFP 10 stated You would produce documents "sufficient to show the categories of CLEAR customers—for example, law firms, businesses, and government agencies…").

RESPONSE TO INTERROGATORY NO. 3:

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 restrictions limiting which entities may use CLEAR, of the purposes for which CLEAR may be used, and of the proactive program to ensure CLEAR is used appropriately.

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. The "purposes for which a user has accessed information through CLEAR" seeks information outside Thomson Reuters' possession, custody, and control and which are instead in the custody and control of the CLEAR customer alone.

2. The phrase "identify all purposes" is vague and incomprehensible given Plaintiff's definition of "Identify," such that answering the Interrogatory as phrased is impossible.

INTERROGATORY NO. 4:

For each category of content responsive to Interrogatory No. 1, state the number of Californians for whom CLEAR has had information available to provide in response to a CLEAR query.

RESPONSE TO INTERROGATORY NO. 4:

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.

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. Thomson Reuters has previously confirmed that it will stipulate that the number of "persons residing in the state of California whose name, photographs, personal identifying information, or other personal data is or was included in the CLEAR database during the limitations period," Compl. ¶ 70, is greater than 40. Consequently, the information sought by this Interrogatory is not relevant to any claims or defenses of any party.

2. This Interrogatory seeks information that is irrelevant because Plaintiffs' remaining claims challenge only the "selling" of information, not the mere availability of information through CLEAR.

INTERROGATORY NO. 5:

For each category of content responsive to Interrogatory No. 1, state the number of Californians for whom CLEAR has disseminated information in response to a CLEAR query.

RESPONSE TO INTERROGATORY NO. 5:

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. Thomson Reuters has previously confirmed that it will stipulate that the number of "persons residing in the state of California whose name, photographs, personal identifying information, or other personal data is or was included in the CLEAR

database during the limitations period," Compl. ¶ 70, is greater than 40. Consequently, the information sought by this Interrogatory is not relevant to any claims or defenses of any party.

2. This Interrogatory seeks information that is irrelevant because Plaintiffs' remaining claims challenge only the "selling" of information, not the mere dissemination of information through CLEAR.

INTERROGATORY NO. 6:

Identify each category of content responsive to Interrogatory No. 1 to which You refer in having described CLEAR as containing "proprietary data," "proprietary databases," or "proprietary records," (for example, at Bates Number TR-BROOKS013851, You describe CLEAR as containing an "unparalleled collection of public and proprietary records," and at Bates Number TR-BROOKS-000218 You refer to "proprietary databases" and "proprietary data" available through CLEAR).

RESPONSE TO INTERROGATORY NO. 6:

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

Subject to and without waiving the objections set forth in answer to Interrogatory No. 1 and below, Thomson Reuters answers that "proprietary" generally refers to information that Thomson Reuters has licensed from third parties and that are not public records (e.g., court filings) or records that are publicly available (e.g., via public websites, telephone directories, etc.). In further answer to this Interrogatory, pursuant to Federal Rule of Civil Procedure 33(d), Thomson Reuters directs Plaintiffs to third-party licensing agreements between Thomson Reuters and third-party licensors.

Thomson Reuters objects to providing any further answer to this Interrogatory on the grounds that the phrase "to which You refer in having described CLEAR as containing 'proprietary data,' 'proprietary databases,' or 'proprietary records'" is vague and overbroad to the extent it purports to ask about Thomson Reuters' use of the term "proprietary" without context (and in fact, that term is not used in the document appearing at Bates Number TR-BROOKS-

000218), and, as phrased, this Interrogatory is unduly burdensome and not proportional to the needs of the case.

INTERROGATORY NO. 7:

Explain what You mean when you describe data or records as "proprietary" (for example, does the data include primary source research, is it organized in a unique way, has it been linked with other data, or any other process, characteristic, quality, or type that would qualify that data as "proprietary").

RESPONSE TO INTERROGATORY NO. 7:

Thomson Reuters incorporates its objections and answers to Interrogatories Nos. 1 and 6.

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).

RESPONSE 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.

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.

RESPONSE 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.

INTERROGATORY NO. 10:

Describe all methods Thomson Reuters has used to determine the accuracy of data within CLEAR, delineated by categories responsive to Interrogatory No. 1.

RESPONSE TO INTERROGATORY NO. 10:

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.

INTERROGATORY NO. 11:

Explain why this case is not amenable to class certification.

RESPONSE TO INTERROGATORY NO. 11:

Subject to and without waiving the objections set forth below, Thomson Reuters answers that Plaintiffs cannot demonstrate the class is so numerous that joinder of all members is impracticable; there are questions of law or fact common to the class; the claims or defenses of the representative parties are typical of the claims or defenses of the class; and the representative parties will fairly and adequately protect the interests of the class. Nor can Plaintiffs demonstrate that Thomson Reuters has acted or refused to act on grounds that apply generally to the class, so that final injunctive relief or corresponding declaratory relief is appropriate respecting the class as a whole; or that questions of law or fact common to class members predominate over any questions affecting only individual members, and that a class action is superior to other available methods for fairly and efficiently adjudicating the controversy, considering, among other issues, the class members' interests in individually controlling the prosecution or defense of separate actions; the extent and nature of any litigation concerning the controversy already begun by or

against class members; the desirability or undesirability of concentrating the litigation of the claims in the particular forum; and the likely difficulties in managing a class action. Thomson Reuters also incorporates the answer set forth in Attachment A in its entirety, and objects to providing further answer to this Interrogatory on the grounds that it calls for contentions, claims, or legal conclusions regarding issues or potential issues in this litigation. Regardless of whether this Interrogatory may be proper at some other time in the lawsuit, it is premature, and it is further objectionable because it seeks Thomson Reuters' reasoning and the theories of its contentions, and therefore seeks information protected by the attorney work product doctrine. Further, it is the plaintiff's burden to affirmatively demonstrate that class certification is appropriate, which plaintiffs have not yet done, so Thomson Reuters' answer to this Interrogatory depends on information in the possession of plaintiffs.

INTERROGATORY NO. 12:

State all facts upon which You base any denial of a material allegation and each special or affirmative defense.

RESPONSE TO INTERROGATORY NO. 12:

Thomson Reuters incorporates Attachment A in its entirety. In addition, all documents produced in this case are consistent with, and therefore may form the basis for, Thomson Reuters' defense of Plaintiffs' claims. Accordingly, pursuant to Federal Rule of Civil Procedure 33(d), Thomson Reuters refers Plaintiffs to the documents that the parties have produced in this case. Thomson Reuters incorporates its objections and answers to the foregoing Interrogatories, and objects to providing further answer to this Interrogatory on the grounds that it is compound, overbroad, unduly burdensome, seeks attorney work product, and is a premature contention interrogatory. Thomson Reuters further objects to this Interrogatory as requiring a legal conclusion as to which allegations are "material" to plaintiffs' claims.

INTERROGATORY NO. 13:

For each fiscal quarter between Q1 2015 and the present, state the total number of CLEAR searches run and, among those, the total number relating to natural persons for whom CLEAR has listed a California address within the class period.

RESPONSE TO INTERROGATORY NO. 13:

Thomson Reuters incorporates its objections and answers to Interrogatories Nos. 1-5, 8, and 10. Thomson Reuters further objects to this Interrogatory as compound and not proportional to the needs of the case. Thomson Reuters also objects to the term "class period" as vague, undefined, and as requiring a legal conclusion.

Subject to and without waiving these objections, in further answer to this Interrogatory, pursuant to Federal Rule of Civil Procedure 33(d), Thomson Reuters will produce documents reflecting search inquiries performed on CLEAR since 2015 for the individuals named Cat Brooks and Rasheed Shabazz.

INTERROGATORY NO. 14:

For each fiscal quarter between Q1 2015 and the present, identify the total number of persons and entities who have had records or other data accessible through CLEAR and, among those, the total number of Californians.

RESPONSE TO INTERROGATORY NO. 14:

Thomson Reuters incorporates its answers and objections to Interrogatories Nos. 1-5, 8, 10, and 13. Thomson Reuters objects to providing further answer to this Interrogatory on the grounds set forth in the answers and objections to Interrogatories Nos. 1-5, 8, 10, and 13, and because it is compound, vague, and not proportional to the needs of the case.

INTERROGATORY NO. 15:

For each fiscal quarter between Q1 2015 and the present, identify the total number of data points accessible through CLEAR for all persons and entities who have had records or other data accessible through CLEAR within the class period, and, among those, the total number of data points accessible for all Californians.

RESPONSE TO INTERROGATORY NO. 15:

Thomson Reuters incorporates its objections and answers to Interrogatories Nos. 1-5, 8, 10, 13, and 14. Thomson Reuters objects to providing further answer to this Interrogatory on the grounds set forth in the answers to Interrogatories Nos. 1-5, 8, 10, 13, and 14, and because this

Interrogatory is vague in its use of the terms "data point" and "data points accessible through CLEAR," is not proportional to the needs of the case, and is compound.

INTERROGATORY NO. 16:

For each fiscal quarter between Q1 2015 and the present, state the gross and net revenues You have generated from CLEAR, delineated by each of the ways that You collect revenue from CLEAR (for example, revenue attributable to per-search charges, revenue attributable to subscription plans, revenue attributable to custom pricing packages, revenue attributable to standard package arrangements including CLEAR, or any other means by which CLEAR generates revenue).

RESPONSE TO INTERROGATORY NO. 16:

Thomson Reuters understands this Interrogatory to seek revenue and operating income (EBITDA or earnings before interest, taxes, depreciation, and amortization) for CLEAR since 2015. Thomson Reuters further understands that Plaintiffs seek that revenue data broken down based on CLEAR pricing models.

Subject to that interpretation and without waiving the objections set forth below, in answer to this Interrogatory, pursuant to Federal Rule of Civil Procedure 33(d), Thomson Reuters refers Plaintiffs to TR-BROOKS017074, which provides financial data for CLEAR on an annual basis. To the extent that this Interrogatory seeks this information broken down by fiscal quarter, Thomson Reuters objects to this Interrogatory as seeking information that is not relevant to any party's claim or defense such that this request is unduly burdensome and not proportional to the needs of the case. To the extent this Interrogatory seeks revenue broken down based on each and every "means" by which CLEAR generates revenue, Thomson Reuters objects to this Interrogatory as seeking information that is not relevant to any party's claim or defense such that this request is unduly burdensome and not proportional to the needs of the case.

Should Plaintiffs continue to seek additional financial data, Thomson Reuters invites Plaintiffs to meet and confer on that subject.

INTERROGATORY NO. 17:

For each fiscal quarter between Q1 2015 and the present, state the gross and net revenues You have generated from searches of Californians.

RESPONSE TO INTERROGATORY NO. 17:

Thomson Reuters incorporates its objections and answers to Interrogatories Nos. 1-5, 8, 10, 13, and 14-16. Thomson Reuters objects to providing further answer to this Interrogatory on the grounds set forth in the answers and objections to the foregoing Interrogatories, and on the grounds that this Interrogatory is compound and not proportional to the needs of the case.

INTERROGATORY NO. 18:

For each fiscal quarter between Q1 2015 and the present, state the gross and net revenues You have generated from CLEAR, excluding per-search charges, attributed to CLEAR's ability to query records relating to Californians, and identify how those revenues were calculated.

RESPONSE TO INTERROGATORY NO. 18:

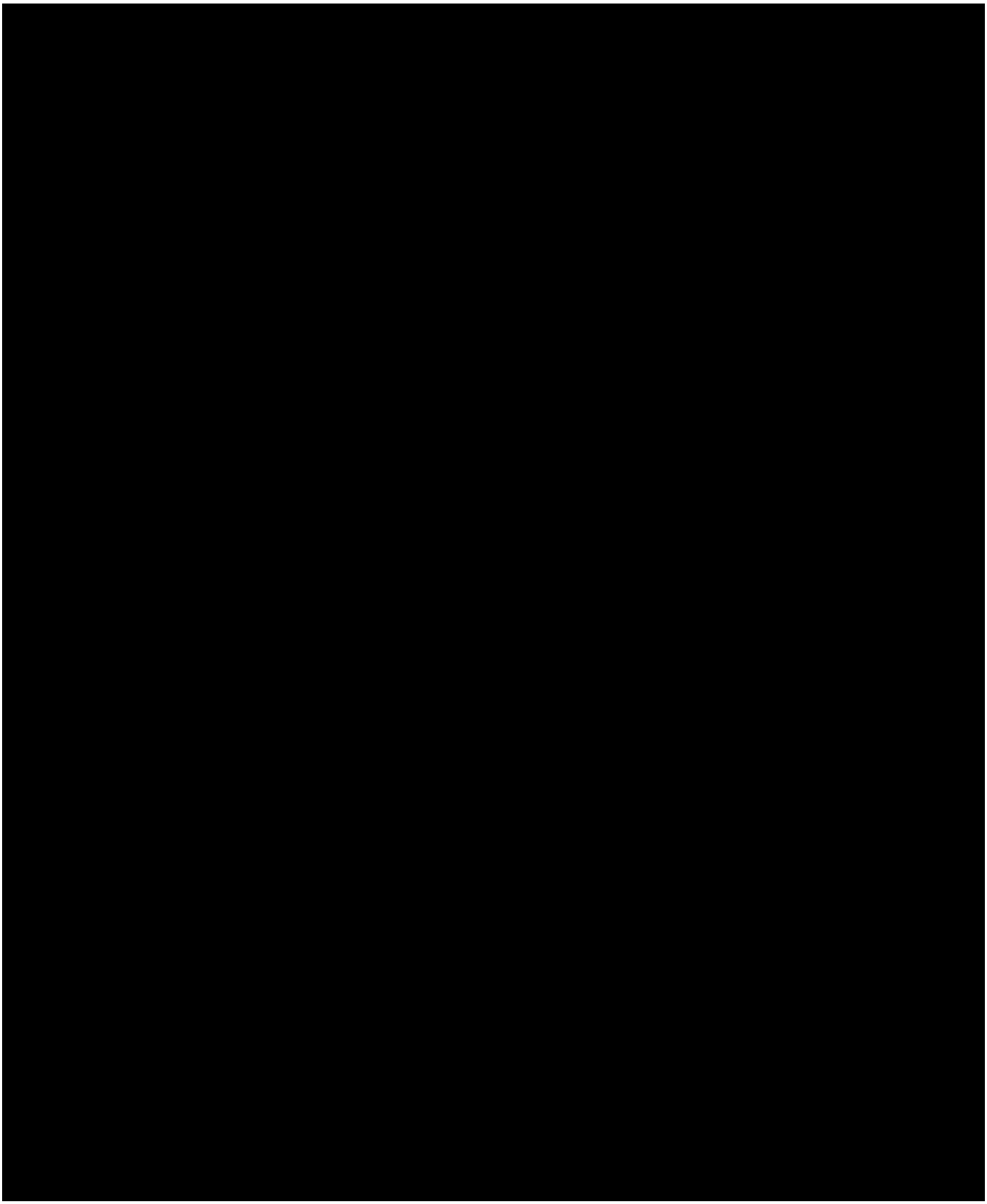
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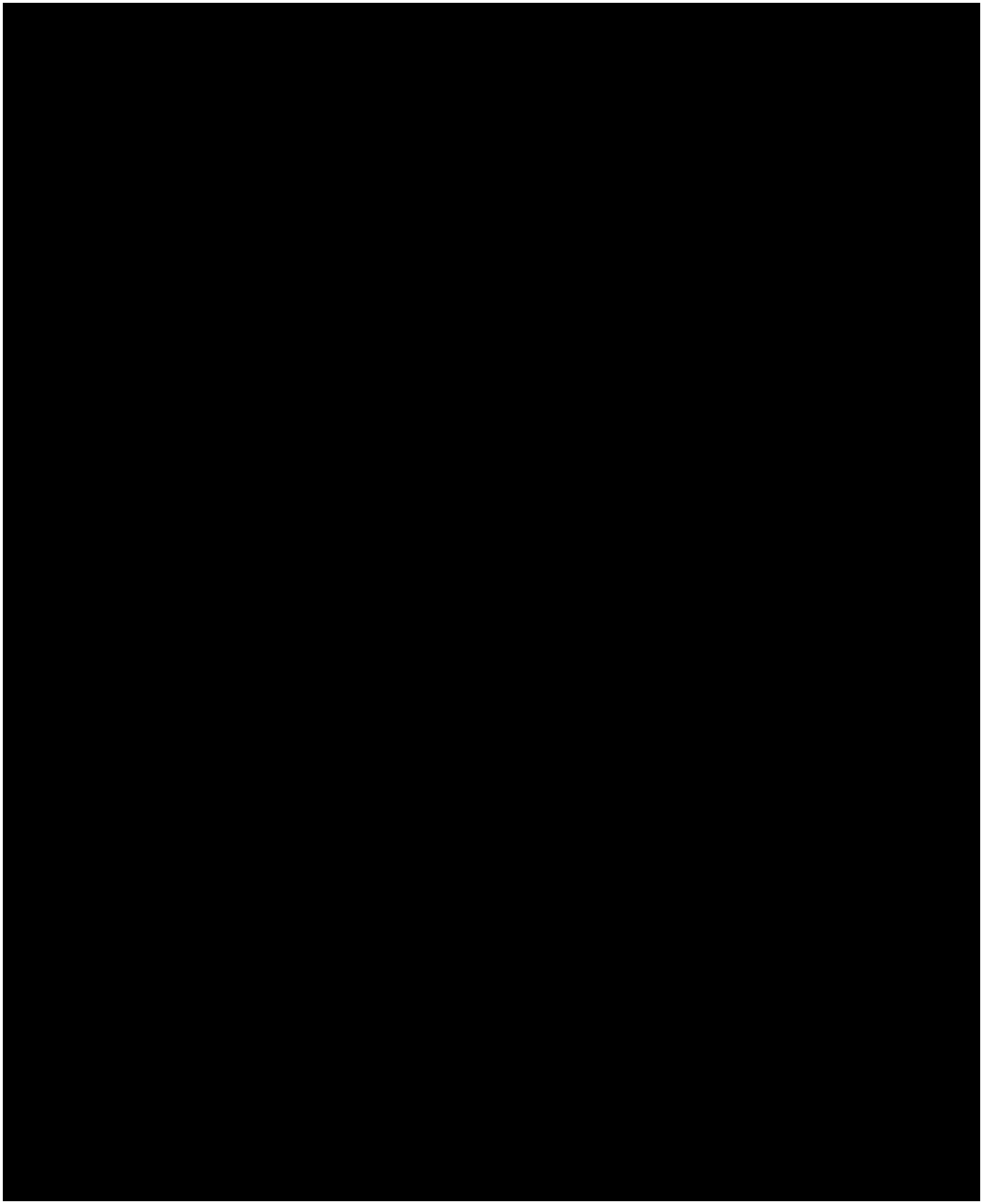
Dated: April 4, 2022

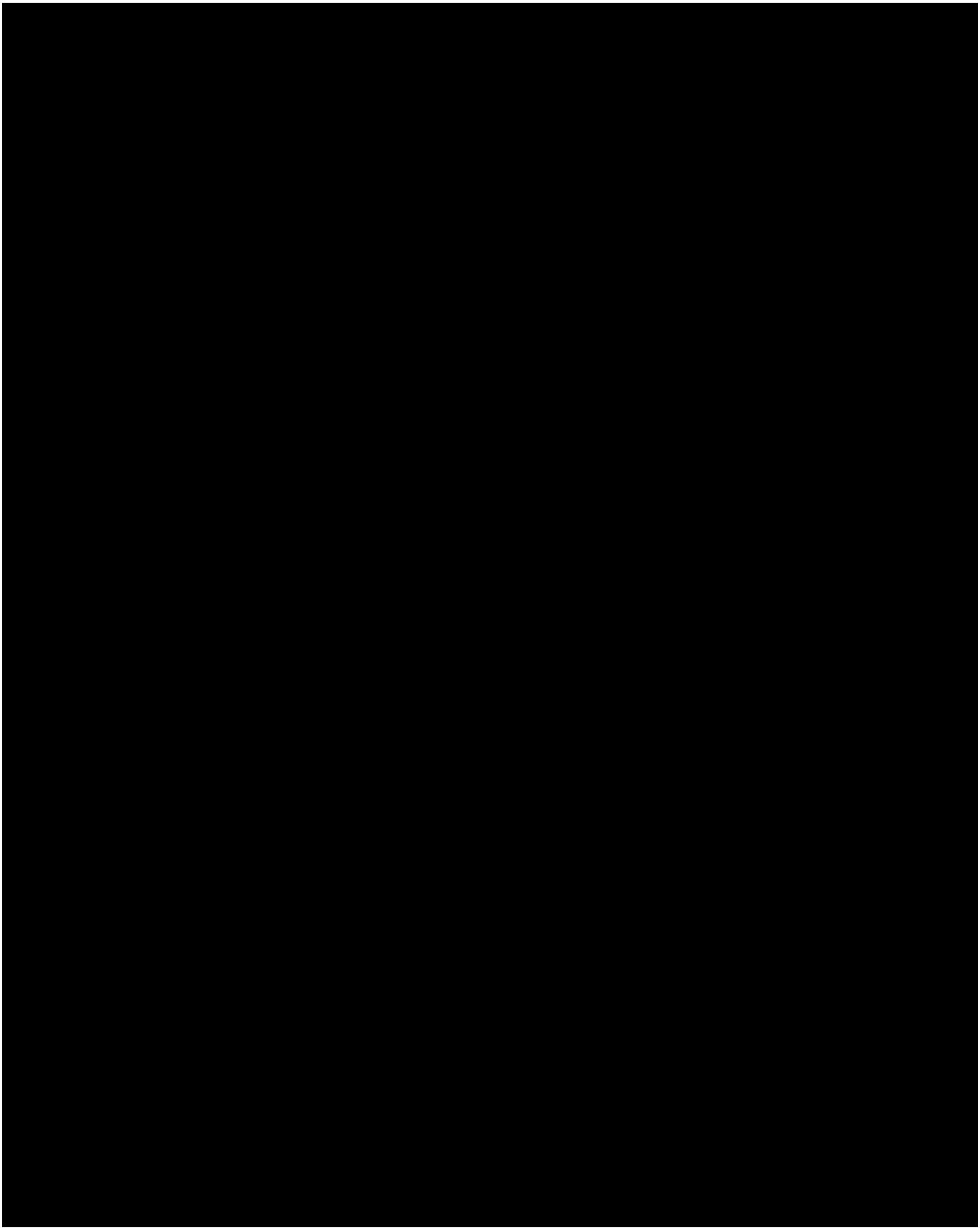
PERKINS COIE LLP

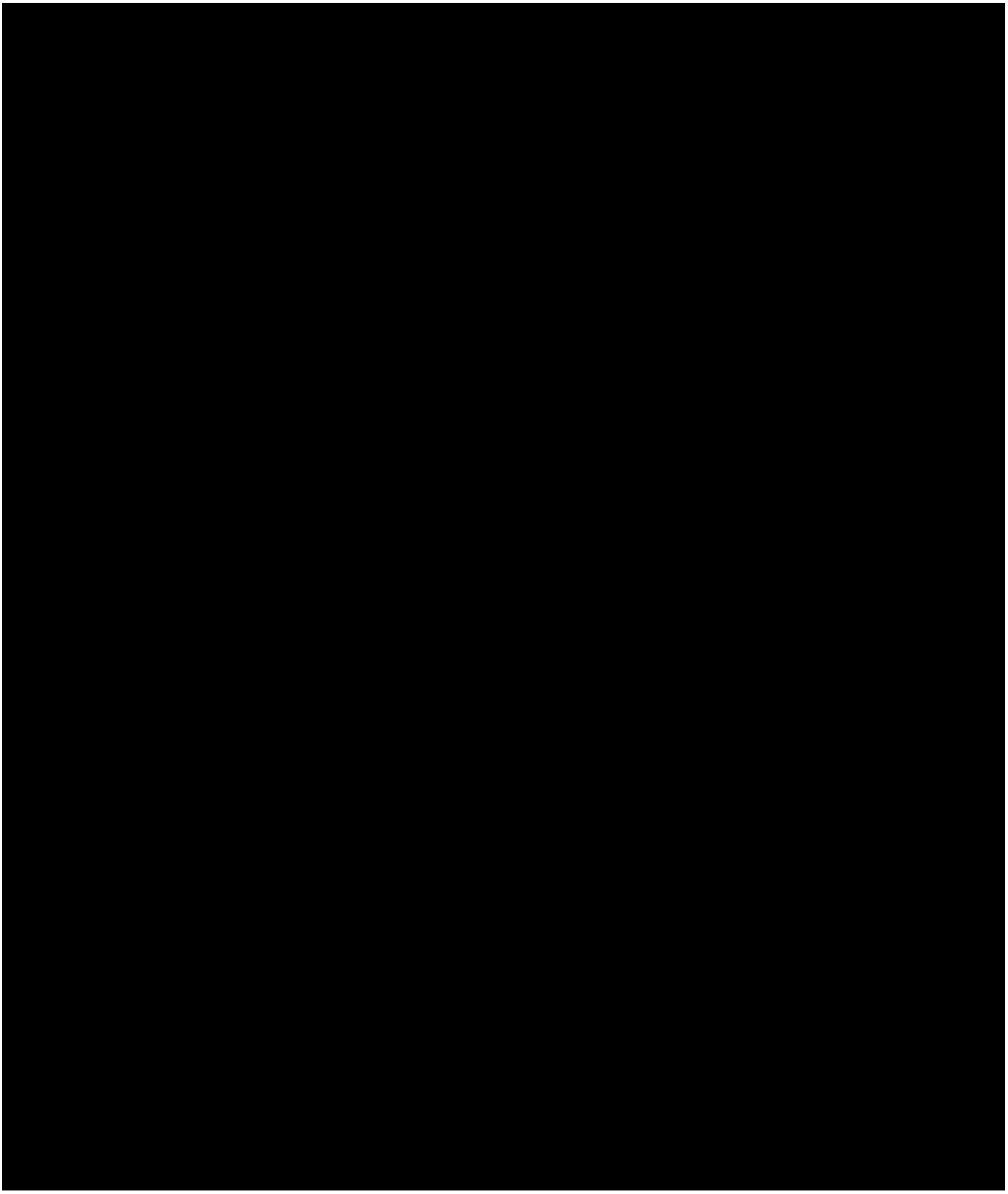
By: */s/ Susan D. Fahringer*
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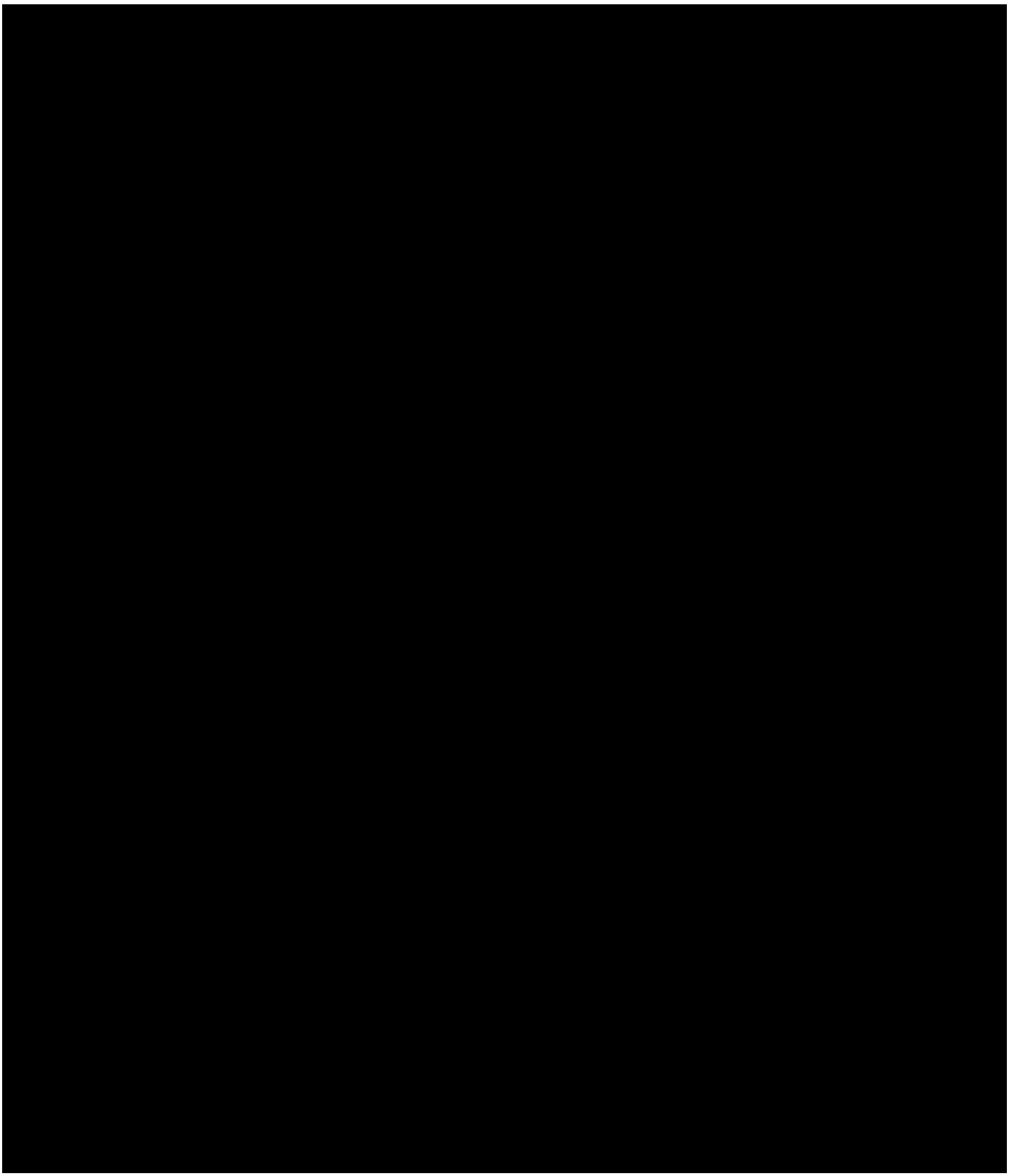
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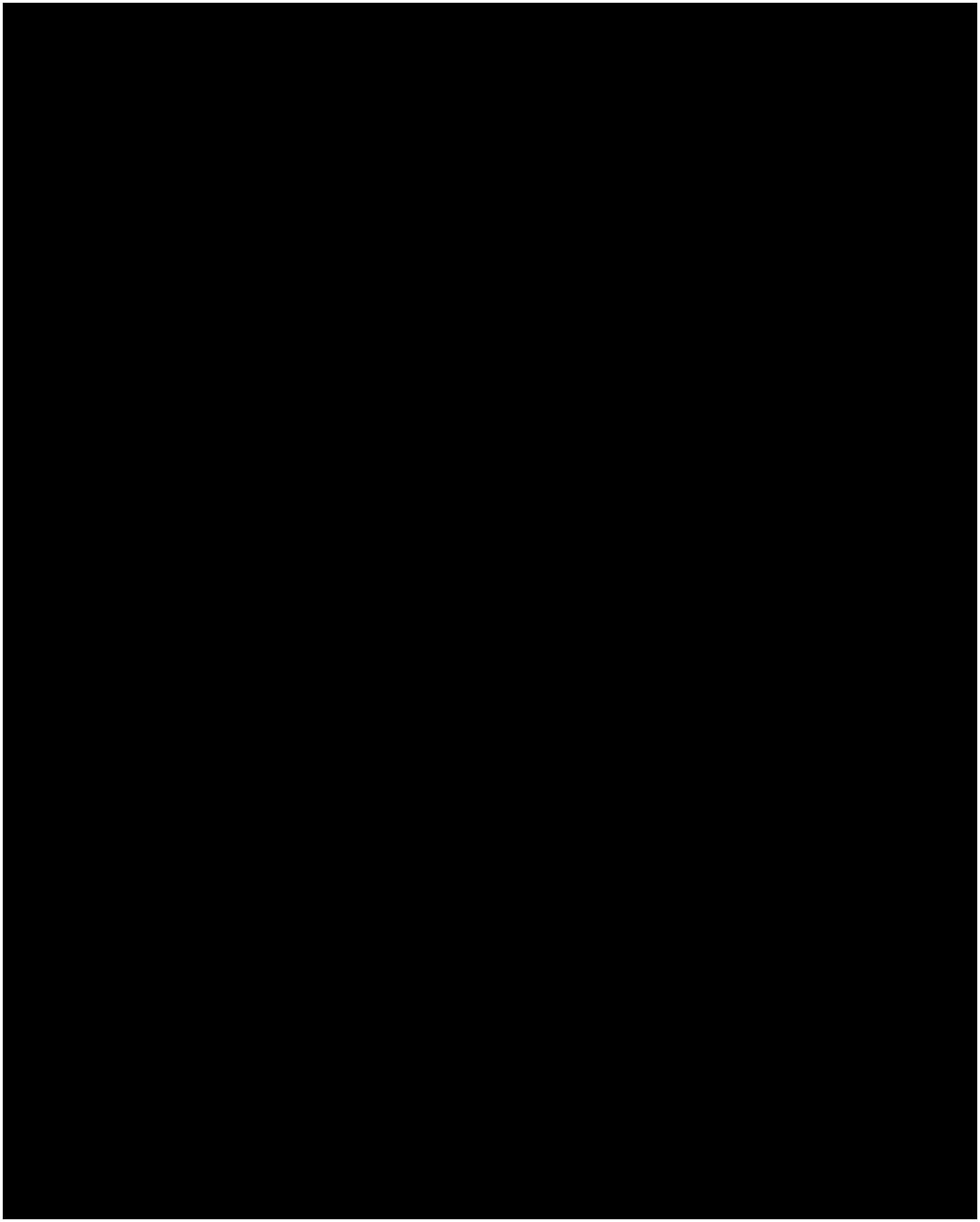


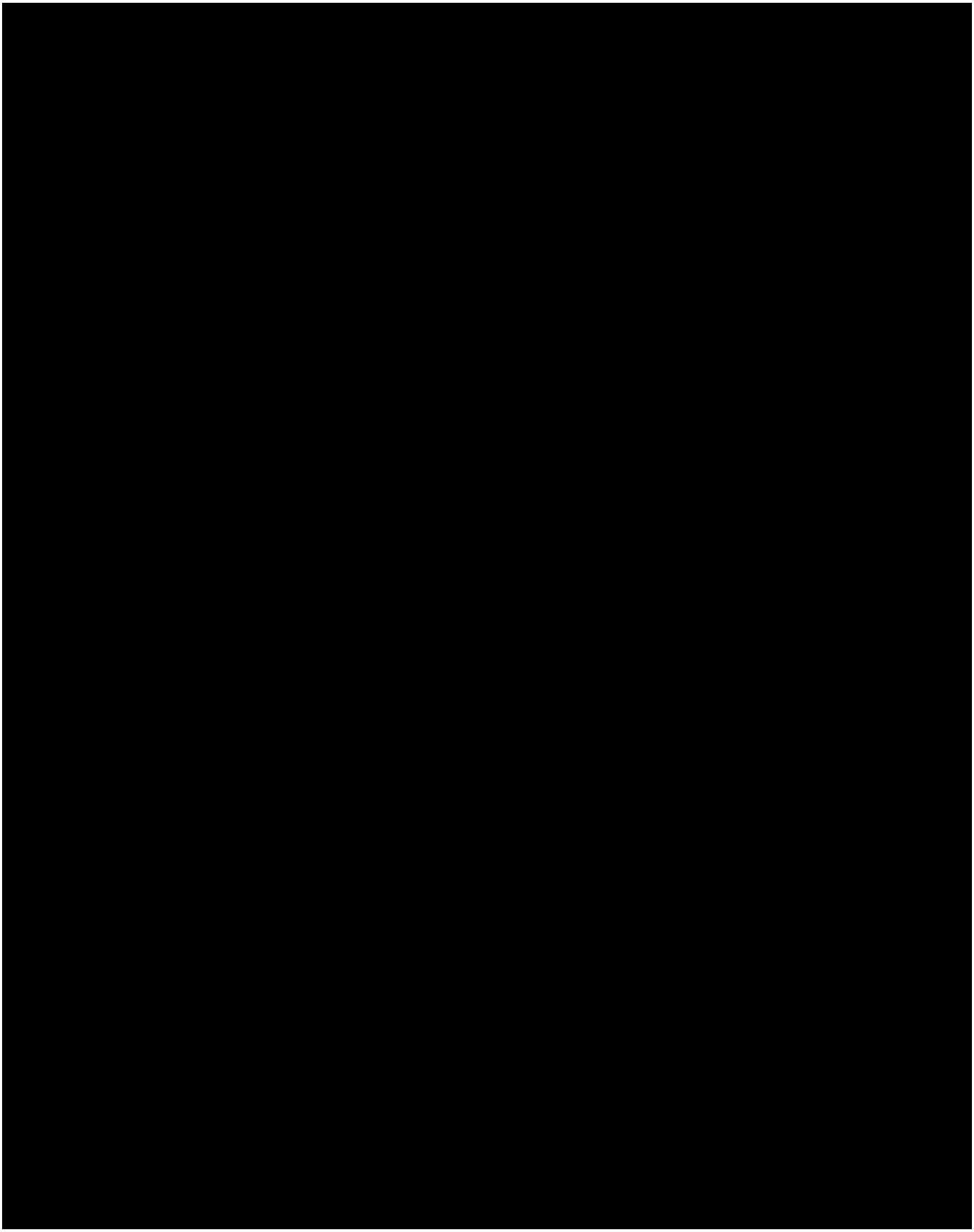


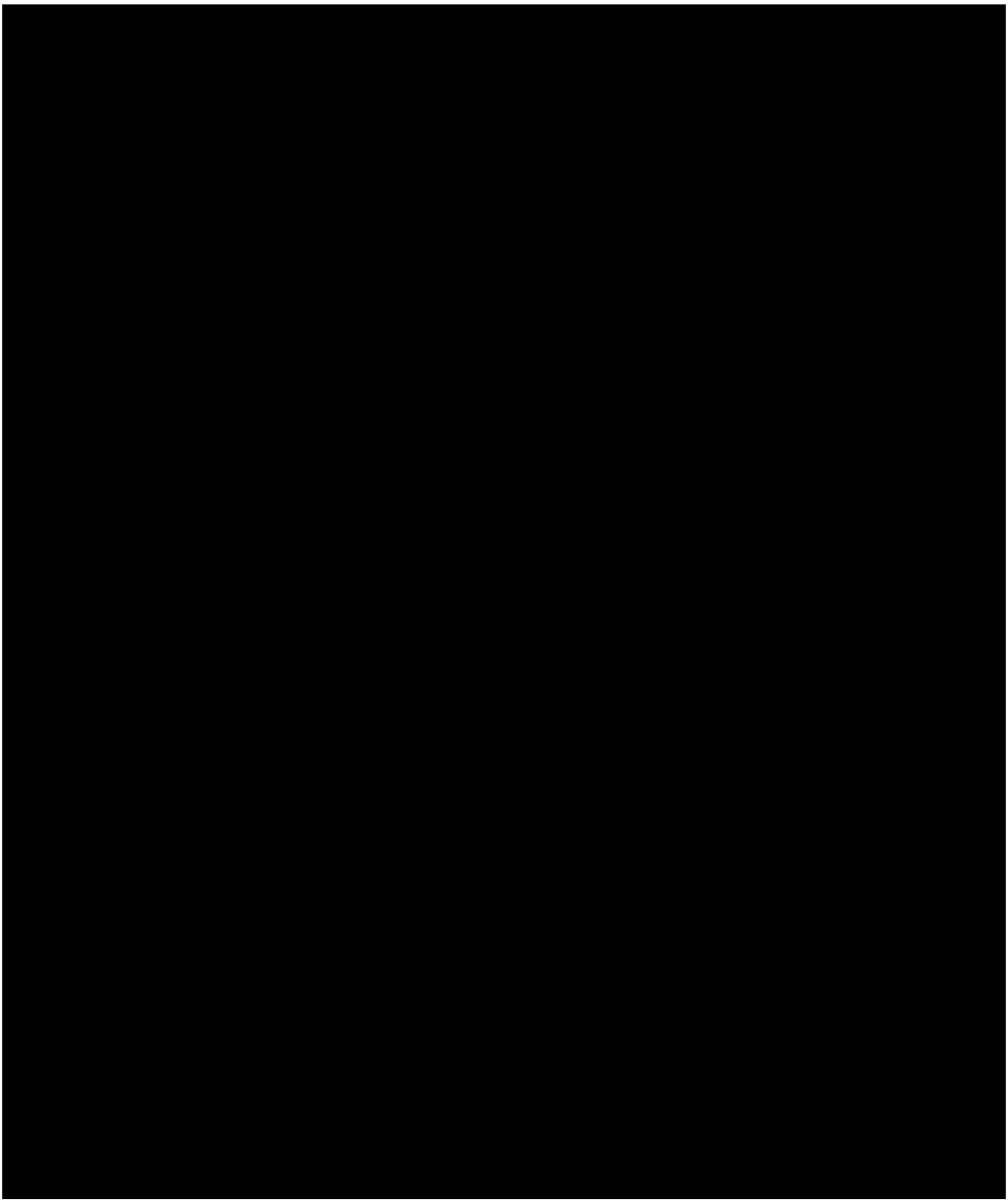












PROOF OF SERVICE

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 April 4, 2022, I served a copy of the within document(s):

DEFENDANT THOMSON REUTERS CORPORATION'S RESPONSES 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 April 4, 2022, at Bainbridge Island, WA.

Anna Mouw Thompson