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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-1418-EMC-KAW

STIPULATION AND [PROPOSED] ORDER REGARDING THE PARTIES' JOINT DISCOVERY LETTER

Judge: Hon. Kandis A. Westmore

Whereas, Plaintiffs submitted, and Defendant did not oppose entry of a proposed order "on the issue of permissible use that Plaintiffs would designate for their use of the [CLEAR] platform" along with the parties' discovery dispute, *see* ECF 120; *see also* ECF 109 (Pls.' Proposed Order);

Whereas the Court ordered the parties to re-submit that proposed order as a stipulation and proposed order, *see* ECF 120;

Whereas Plaintiffs have proposed, and Defendant does not oppose, the Court entering an order stating that Plaintiffs may select the following permissible purposes from CLEAR's menu of options for their activity in CLEAR pursuant to the terms of the parties' agreement regarding access to CLEAR for civil discovery. Gramm-Leach-Bliley Act: For use in complying with a properly authorized civil, criminal or regulatory investigation, or subpoena or summons by federal, state, or local authorities. Driver's Privacy Protection Act: For use in connection with a civil, criminal or arbitral legal proceeding or legal research. Voters: Use in connection with a non-commercial purpose, *see* ECF 120; ECF 109;

ACCORDINGLY, pursuant to stipulation and subject to Court approval, Plaintiffs may select the permissible uses stated here for their use of CLEAR pursuant to this Court's order regarding the parties' September 22, 2022 Discovery Letter Brief, ECF 109.

DATED: November 14, 2022

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Respectfully submitted,

/s/ *Andre M. Mura*

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[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED:

The Hon. Kandis A. Westmore
United States Magistrate Judge

ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from the other signatory.

/s/ *Andre M. Mura*