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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

STIPULATION AND [PROPOSED] ORDER EXTENDING DEADLINES PURSUANT TO LOCAL RULE 79-5

Current Response Date: November 16, 2022

New Response Date: December 7, 2022

Pursuant to Federal Rule of Civil Procedure 6(b) and Civil Local Rule 6-1(b), 6-2, and 7-12, Defendant Thomson Reuters Corporation ("Thomson Reuters") and Plaintiffs Cat Brooks and Rasheed Shabazz ("Plaintiffs"), by and through their respective counsel, hereby stipulate as follows:

WHEREAS, N.D. Cal. Civil Local Rule 79-5 governs the under seal filing of documents designated as confidential or subject to a protective order;

WHEREAS, on November 9, 2022, Plaintiffs filed an Administrative Motion to Consider Whether Another Party's Materials [namely, Thomson Reuters' materials] Should Be Sealed (the "Sealing Motion"), Dkt. 124.

WHEREAS, N.D. Cal. Civil Local Rule 79-5(f) requires Thomson Reuters, the designating party of the materials subject to the Sealing Motion, to file a statement and/or declaration establishing that the designated material is sealable within 7 days of the filing of an administrative motion to file under seal;

WHEREAS, N.D. Cal. Civil Local Rule 79-5(f) requires Plaintiffs to file a response to Thomson Reuters' statement and/or declaration no later than 4 days after the filing of that statement and/or declaration;

WHEREAS, the parties mutually agree to extend Thomson Reuters' deadline for filing its statement and/or declaration by 21 days and Plaintiffs' deadline for filing their response to Thomson Reuters' statement and/or declaration by 5 days;

WHEREAS, there is good cause for an extension given the volume and density of the materials subject to the Sealing Motion and the need for Thomson Reuters to conduct a thorough and careful review to determine which of those materials should, in fact, be sealed;

WHEREAS, no party will be prejudiced and no other deadlines will be affected by the extension.

IT IS HEREBY STIPULATED AND AGREED by the parties as follows:

1. Subject to the Court's approval, Thomson Reuters' deadline to submit a statement and/or declaration in response to Plaintiffs' Sealing Motion pursuant to Local Rule 79-5 is extended by 21 days, to December 7, 2022, and Plaintiffs' deadline to submit a response to Thomson Reuters' statement and/or declaration is extended by 5 days, to December 16, 2022.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

DATED: November 14, 2022

PERKINS COIE LLP

By: */s/ Susan D. Fahringer*
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Attorneys for Defendant
Thomson Reuters Corporation

DATED: November 14, 2022

By: */s/ Andre M. Mura*
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ATTESTATION

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

/s/ Susan D. Fahringer
Susan D. Fahringer

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: _____

_____
Hon. Edward M. Chen
United States District Judge