

EXHIBIT 5

~~Confidential - Dori Buckethal~~

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.

10 * * * * *

11 ***** CONFIDENTIAL *****

12
13 REMOTE VIDEOTAPED DEPOSITION OF DORI BUCKETHAL
14

May 18, 2022

15 9:00 a.m. to 5:18 p.m.

16 REPORTED BY ANITA KORNBURGER
17 REGISTERED PROFESSIONAL REPORTER
18

19 ***** CONFIDENTIAL *****

20 * * * * *

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1 Q. And what kinds of interfacing did you
2 have with Greg Coyle from the product team?

3 A. I don't know. It's a long time ago. I
4 would -- I don't know how I would answer that.

5 Q. Okay. You provided here in your resumé
6 that right after where the word CLEAR is, it says
7 "next generation public records platform." What
8 did you mean by "next generation public records
9 platform"?

10 A. I meant that CLEAR was the next
11 generation of a public records platform that
12 ChoicePoint previously had called AutoTrack XP.

13 Q. What was AutoTrack XP?

14 A. It was an older version of a public
15 records platform.

16 Q. And did CLEAR have improvements on
17 AutoTrack XP?

18 A. Yes.

19 Q. What types of improvements?

20 A. From what I remember, I would say the
21 interface, you know, the user interface, the way it
22 looks. I'm certain there were other technology
23 upgrades, but I'm not -- that's not my area of
24 expertise, so I wouldn't -- I wouldn't be able to
25 state those. I wouldn't remember.

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1 A. Yes.

2 Q. And what I'm trying to get at is how is
3 CLEAR different today than it was in 2008 when it
4 first launched?

5 A. Oh, gosh. I don't know. I don't think I
6 could answer that question. It seems very -- very
7 general.

8 Q. What kind of features have been added
9 between 2008 and today to CLEAR?

10 A. I could -- I could guess at a few things.
11 I don't know if I could come up with a full list
12 here.

13 Q. Okay. I don't want you to guess. Just a
14 couple examples. I understand that, you know, a
15 full list off the top of your head might be
16 difficult.

17 A. Okay. So 2008 to now, what kind of
18 features. I know that different versions of the
19 product have probably been enhanced or launched in
20 that time period, so those would be features that
21 were new. One that comes to mind is CLEAR ID
22 Confirm would be something new between 2008 and
23 now.

24 Q. Okay. When you said different versions,
25 what would be different from one version to

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1 in California?

2 MS. FAHRINGER: Form.

3 THE WITNESS: Would I agree that CLEAR
4 contains data concerning individuals that reside in
5 California. Yes.

6 BY MR. TROUTMAN:

7 Q. Do you know when CLEAR first began
8 selling data from individuals residing in
9 California?

10 MS. FAHRINGER: Form.

11 THE WITNESS: No, I don't know that.

12 BY MR. TROUTMAN:

13 Q. Does CLEAR contain data on individuals'
14 residency?

15 MS. FAHRINGER: Form.

16 THE WITNESS: What do you mean by
17 "residency"?

18 BY MR. TROUTMAN:

19 Q. Where someone lives.

20 A. I would say that CLEAR contains address
21 information.

22 Q. Do you currently use any form of digital
23 advertising to advertise for CLEAR?

24 A. What do you mean by "digital
25 advertising"?

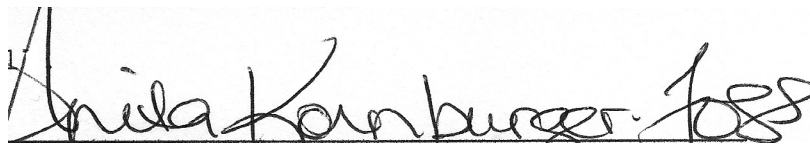
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1 CERTIFICATE

2 I, Anita Kornburger, Registered Professional
3 Reporter and Certified Shorthand Reporter, do
4 hereby certify that prior to the commencement
5 of the deposition, Dori Buckethal was duly
6 remotely sworn by me to testify to the truth,
7 the whole truth and nothing but the truth.

8 I DO FURTHER CERTIFY that the foregoing is
9 a verbatim transcript of the testimony as taken
10 stenographically by me at the time, place and
11 on the date set forth, to the best of my
12 ability.

13 I DO FURTHER CERTIFY that I am neither
14 a relative nor employee nor attorney nor
15 counsel of any of the parties to this action,
16 and that I am neither a relative nor employee
17 of such attorney or counsel, and that I am not
18 financially interested in the action.

19 
20

21 Anita Kornburger

Registered Professional Reporter

22 Certified Shorthand Reporter

Notary Public

23 Dated: May 23, 2022

24

25

June 23, 2022

**Re: *Brooks et al. v. Thomson Reuters Corporation*,
USDC Northern District of California - San Francisco Division
Case No. 3:21-cv-01418-EMC**

**Deposition Errata for the Deposition of Dorian Buckethal
(Transcript dated May 18, 2022)**

To whom it may concern:

I, Dorian Buckethal, 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 18, 2022. Attached hereto is a list of errata identified in the deposition transcript.

/s/ Dorian Buckethal
DORIAN BUCKETHAL

June 23, 2022
DATE

Dorian Buckethal Deposition Errata Sheet

Page:Line(s)	Existing Testimony	Corrected Testimony	Reason
14:12	“job that he was passing my e-mail - my resumé...”	“job that he was passing my resumé”	Misstatement
22:10	“account manager ”	“account managers”	Transcription error
28:22	“Steve Brubely ”	“Steve Rubely ”	Transcription error
30:17	“ I don’t -- I don’t recall”	“I don’t recall”	Misstatement
35:3	“marketing man ”	“marketing manager ”	Transcription error
37:3-4	“product into the corp -- our corporate...”	“product into our corporate...”	Misstatement
42:9	“Buquette Bysett”	“ Buket Bayaset ”	Transcription error
45:5	“market”	“ marketing ”	Transcription error
171:20-22	“I don’t know how to answer that question. I don’t know how to answer that question. ”	“I don’t know how to answer that question.”	Transcription error
182:8	“reasonable, but that’s...”	“reasonable, that’s...”	Transcription error
247:1	“ The every major...”	“ That every major...”	Transcription error