

Susan D. Fahringer, Bar No. 21567
SFahringer@perkinscoie.com
Nicola C. Menaldo, *pro hac vice*
NMenaldo@perkinscoie.com
Erin K. Earl, *pro hac vice*
EEarl@perkinscoie.com
Anna M. Thompson, *pro hac vice*
AnnaThompson@perkinscoie.com
PERKINS COIE LLP
1201 Third Avenue, Suite 4900
Seattle, WA 98101-3099
Telephone: 206.359.8000
Facsimile: 206.359.9000

Attorneys for Defendant
Thomson Reuters Corporation

Gabriella Gallego, Bar No. 324226
GGallego@perkinscoie.com
PERKINS COIE LLP
3150 Porter Drive
Palo Alto, CA 94304-1212
Telephone: 650.838.4300
Facsimile: 650.838.4350

Hayden M. Schottlaender, *pro hac vice*
HSchottlaender@perkinscoie.com
PERKINS COIE LLP
500 N. Akard Street, Suite 3300
Dallas, TX 75201-3347
Telephone: 214.965.7700
Facsimile: 214.965.7799

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

**DECLARATION OF ANNA MOUW
THOMPSON IN SUPPORT OF THOMSON
REUTERS' ADMINISTRATIVE MOTION
TO FILE UNDER SEAL CONFIDENTIAL
INFORMATION**

1 I, Anna Mouw Thompson, declare as follows:

2 1. I am an attorney with the law firm of Perkins Coie LLP and counsel for defendant
3 Thomson Reuters Corporation (“Defendant”) in the above-captioned matter. I submit this
4 declaration pursuant to Civil Local Rule 79-5 in support of Thomson Reuters’ Administrative
5 Motion to File Under Seal Confidential Information (“Sealing Motion”). I make this declaration
6 based upon personal knowledge and if called upon to do so I could and would testify competently
7 to the facts set forth herein.

8 2. Good cause and compelling reasons exist to fully seal the documents listed in
9 Exhibit 1 to Thomson Reuters’ Sealing Motion for the reasons further explained on a document-
10 by-document basis in Exhibit 1, and as verified by this Thompson Sealing Declaration and by the
11 Appold Sealing Declaration submitted concurrently with Thomson Reuters’ Sealing Motion.
12 These documents have also been designated as “CONFIDENTIAL” or “HIGHLY
13 CONFIDENTIAL - ATTORNEYS’ EYES ONLY” under the terms of the Stipulated Protective
14 Order (Dkt. 70) entered in this action.

15 3. Good cause and compelling reasons exist to partially seal (i.e., apply redactions to)
16 the documents listed in Exhibits 2-7 to Thomson Reuters’ Sealing Motion for the reasons further
17 explained on a document-by-document basis in Exhibits 2-7, and as verified by this Thompson
18 Sealing Declaration and by the Appold Sealing Declaration submitted concurrently with Thomson
19 Reuters’ Sealing Motion. This information has also been designated as “CONFIDENTIAL” or
20 “HIGHLY CONFIDENTIAL - ATTORNEYS’ EYES ONLY” under the terms of the Stipulated
21 Protective Order (Dkt. 70) entered in this action.

22 4. In addition, Exhibits A-9 through A-12 to the Declaration of Susan Fahringer in
23 Support of Defendant Thomson Reuters’ Opposition to Plaintiffs’ Motion to Class Certification,
24 which Thomson Reuters seeks to seal for the reasons stated in Exhibit 1, have also been
25 designated by Plaintiffs as HIGHLY CONFIDENTIAL - ATTORNEYS’ EYES ONLY under the
26 terms of the Stipulated Protective Order (Dkt. 70) entered in this action.

27
28 [signature on following page]

1
2 I declare under penalty of perjury under the laws of the United States that the foregoing is
3 true and correct.

4 Executed this 26th day of January, 2023, at Bainbridge Island, Washington.

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6 /s/ Anna Mouw Thompson
Anna Mouw Thompson
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