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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,

Plaintiff,

v.

THOMSON REUTERS CORPORATION,

Defendants.

Case No. 3:21-cv-01418-EMC

DECLARATION OF SUSAN D. FAHRINGER IN SUPPORT OF DEFENDANT THOMSON REUTERS CORPORATION'S CLASS CERTIFICATION OPPOSITION

Hon. Edward M. Chen

EXHIBIT A

I, Susan D. Fahringer, declare as follows:

1. I am a partner with Perkins Coie LLC and am one of the attorneys for Defendant Thomson Reuters Corporation ("Thomson Reuters") in this case. I make this Declaration based on my personal knowledge and am competent to testify to its contents.

2. Attached as **Exhibit A-1** is a true and correct copy of the Expert Report of Professor Jane Bambauer, served on Plaintiffs by Thomson Reuters on September 7, 2022.

3. Attached as **Exhibit A-2** is a true and correct copy of excerpts from transcript of the deposition of Plaintiff Cat Brooks, taken on August 10, 2022.

4. Attached as **Exhibit A-3** is a true and correct copy of excerpts from the transcript of the deposition of Plaintiff Rasheed Shabazz, taken on August 18, 2022.

5. Attached as **Exhibit A-4** is a true and correct screen capture of the "Bio" page of catbrooks.org, located at URL https://www.catbrooks.org/bio, which was captured at my direction on January 20, 2023.

6. Attached as **Exhibit A-5** is a true and correct screen capture of the landing page of catbrooks.org, located at URL https://www.catbrooks.org, which was captured at my direction on January 20, 2023.

7. Attached as **Exhibit A-6** is a true and correct screen capture of the Wikipedia page for "Cat Brooks," located at URL https://en.wikipedia.org/wiki/Cat_Brooks, which was captured at my direction on November 29, 2021 and was marked and used as Exhibit 5 at the Deposition of Plaintiff Cat Brooks, taken on August 10, 2022.

8. Attached as **Exhibit A-7** is a true and correct screen capture of the IMDb page for "Cat Brooks," located at URL https://www.imdb.com/name/nm9644547/, which was captured at my direction on January 17, 2023.

9. Attached as **Exhibit A-8** is a true and correct screen capture of the "Press" page of catbrooks.org, located at URL https://www.catbrooks.org/presss, which was captured at my direction on July 11, 2022 and was marked and used as Exhibit 4 at the Deposition of Plaintiff Cat Brooks, taken on August 10, 2022.

10. Attached as **Exhibit A-9** is a true and correct copy of a document produced in this

litigation by Plaintiffs bearing Bates No. PLAINTIFFS_005653 - PLAINTIFFS_005661.

11. Attached as **Exhibit A-10** is a true and correct copy of a document produced in this litigation by Plaintiffs bearing Bates No. PLAINTIFFS_005538 - PLAINTIFFS_005547.

12. Attached as **Exhibit A-11** is a true and correct copy of a document produced in this litigation by Plaintiffs bearing Bates No. PLAINTIFFS_011126 - PLAINTIFFS_011253.

13. Attached as **Exhibit A-12** is a true and correct copy of a document produced in this litigation by Plaintiffs bearing Bates No. PLAINTIFFS_011275 - PLAINTIFFS_011312.

14. Attached as **Exhibit A-13** is a true and correct copy of excerpts from the transcript of the deposition of Joseph Turow, Ph.D., taken on August 26, 2022.

15. Attached as **Exhibit A-14** is a true and correct copy of the Expert Report of Dr. Ran Kivetz, served by Thomson Reuters on Plaintiffs on September 7, 2022.

16. Attached as **Exhibit A-15** is a true and correct copy of excerpts from the transcript of the hearing held before this Court in this case on June 30, 2022 regarding Non-Party File & ServeXpress, LLC's Motion for Limited Intervention and for Protective Order.

17. Attached as **Exhibit A-16** is a true and correct copy of excerpts from the transcript of the deposition of Terry Lloyd, taken on August 22, 2022.

18. Attached as **Exhibit A-17** is a true and correct copy of the Expert Report of Douglas Kidder, served by Thomson Reuters on Plaintiffs on September 7, 2022.

I declare under penalty of perjury that the foregoing is true and correct.

Executed January 26, 2023, in Seattle, Washington.

By: s/ *Susan D. Fahringer*
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Attorney for Defendants
Thomson Reuters Corporation