

EXHIBIT A-16

Page 1

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

CAT BROOKS and RASHEED	)	
SHABAZZ, individually and on	)	
behalf of all others	)	
similarly situation,	)	
	)	
Plaintiffs,	)	Civil No.
	)	3:21-cv-01418-EMC
v.	)	
	)	
THOMSON REUTERS	)	
CORPORATION,	)	
	)	Hon. Edward M. Chen
Defendant.	)	
	)	

DEPOSITION OF TERRY LLOYD
August 22, 2022 9:18 a.m.
Location: DEPOSITION BY VIDEOCONFERENCE

Reported by:
HEIDI HUNTER, RPR, CSR

DIGITAL EVIDENCE GROUP
1730 M Street, NW, Suite 812
Washington, D.C. 20036
(202) 232-0646

1 A P P E A R A N C E S

2 FOR THE PLAINTIFF:

3 Amy Zeman

4 Andre M. Mura

5 Ezekiel S. Wald

6 GIBBS LAW GROUP

7 Attorneys at Law

8 505 14th Street, Suite 1110

9 Oakland, CA 94612

10 Email: amz@classlawgroup.com

11

12 FOR THE DEFENDANT:

13 Hayden M. Schottlaender

14 Susan D. Fahringer

15 Kayla Lindgren

16 PERKINS COIE, LLP

17 Attorneys at Law

500 N Akard Street, Suite 3300

18 Dallas, TX 75201

Email: hschottlaender@perkinscoie.com

19

20

21

22

1 for California natural persons.

2 Q If we go to page 18 of your report. This
3 table contains the same calculations as in the
4 Exhibit 1 table we just looked at, but does not
5 contain the blanks for other information that might be
6 missing; is that right?

7 A I think that's a fair summary.

8 Q And in the calculations that you have
9 performed with the numbers that you do have both on
10 page 18 and in Exhibit 1, is there any accounting here
11 for just portions of CLEAR or unjust portions of
12 CLEAR?

13 A My answer is the same as when you asked me
14 that previously. I was not asked to do that. I am
15 not a lawyer. It is not a question that I addressed.

16 MS. ZEMAN: We've been going for, I think,
17 quite a bit over an hour. Can we take a 10-minute
18 break.

19 MR. SCHOTTLAENDER: We're about to go in
20 to -- we can do like a longer lunch break in about 20
21 minutes.

22 Do you want to do that?

1

2

REPORTER'S CERTIFICATE

3

STATE OF UTAH)

4

COUNTY OF SALT LAKE)

5

6

I, Heidi Hunter, RPR, CCR, for the state

7

of Utah.

8

That the foregoing proceedings were taken before me at the time and place set forth in the caption hereof; that the witness was placed under oath to tell the truth, the whole truth, and nothing but the truth.

10

11

That I thereafter transcribed my said shorthand notes into typing and that the typewritten transcript of said deposition is a complete, true and accurate transcription of my said shorthand notes taken at said time.

12

13

I further certify that I am not a relative employee, attorney, or counsel of any of the parties nor am I a relative or employee of any of the parties' attorney or counsel connected with the action, nor am I financially interested in the action.

14

15

16

17

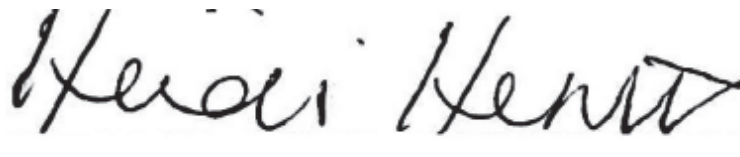
18

19

20

21

22



Heidi Hunter, RPR, CCR

October 3, 2022

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

Deposition Errata for the Deposition of Terry Lloyd (Deposition dated August 22, 2022, transcript received September 2, 2022)

To whom it may concern:

I, Terry Lloyd, have reviewed the transcript of my deposition in *Brooks et al. v. Thomson Reuters Corp.*, Case No. 3:21-cv-01418-EMC, taken on August 22, 2022. Attached hereto is a list of errata identified in the deposition transcript.



TERRY LLOYD



DATE

See Attached CA Notary Certificate 

CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT**CIVIL CODE § 1189**

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

County of Contra CostaOn 10-03-2022 before me, Doraiswami Ramesh, Notary Public

Date

Here Insert Name and Title of the Officer

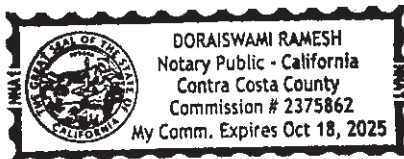
personally appeared Terry Lloyd

Name(s) of Signer(s)

who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.



Signature

Signature of Notary Public

Place Notary Seal Above

OPTIONAL

Though this section is optional, completing this information can deter alteration of the document or fraudulent reattachment of this form to an unintended document.

Description of Attached Document

Title or Type of Document: _____ Document Date: _____

Number of Pages: _____ Signer(s) Other Than Named Above: _____

Capacity(ies) Claimed by Signer(s)

Signer's Name: _____

☐ Corporate Officer — Title(s): _____☐ Partner — ☐ Limited ☐ General☐ Individual ☐ Attorney in Fact☐ Trustee ☐ Guardian or Conservator☐ Other: _____

Signer Is Representing: _____

Signer's Name: _____

☐ Corporate Officer — Title(s): _____☐ Partner — ☐ Limited ☐ General☐ Individual ☐ Attorney in Fact☐ Trustee ☐ Guardian or Conservator☐ Other: _____

Signer Is Representing: _____

8/22/2022 Cat Brooks and Rasheed Shabazz, et al. v. Thomson Reuters Corp. Terry Lloyd

Page 289

1 Digital Evidence Group, L.L.C.

1730 M Street, NW, Suite 812

2 Washington, D.C. 20036

(202) 232-0646

3

4 SIGNATURE PAGE

Case: Cat Brooks and Rasheed Shabazz, et al. v. Thomson Reuters Corp.

5 Witness Name: Terry Lloyd

Deposition Date: August 22, 2022

6

I do hereby acknowledge that I have read
7 and examined the foregoing pages
of the transcript of my deposition and that:

8

9 (Check appropriate box):

() The same is a true, correct and
10 complete transcription of the answers given by
me to the questions therein recorded.

11 (X) Except for the changes noted in the
attached Errata Sheet, the same is a true,
12 correct and complete transcription of the
13 answers given by me to the questions therein
14 recorded.

15

16 10/3/22

17 DATE

18 
WITNESS SIGNATURE

19

20

21

22

DATE

NOTARY

CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT**CIVIL CODE § 1189**

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

County of Contra CostaOn 10-3-2022

before me,

Doraiswami Ramesh, Notary Public

Date

Here Insert Name and Title of the Officer

personally appeared

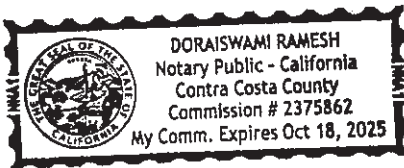
Terry Lloyd

Name(s) of Signer(s)

who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.



Signature

Signature of Notary Public

Place Notary Seal Above

OPTIONAL

Though this section is optional, completing this information can deter alteration of the document or fraudulent reattachment of this form to an unintended document.

Description of Attached Document

Title or Type of Document: _____ Document Date: _____

Number of Pages: _____ Signer(s) Other Than Named Above: _____

Capacity(ies) Claimed by Signer(s)

Signer's Name: _____

☐ Corporate Officer — Title(s): _____☐ Partner — ☐ Limited ☐ General☐ Individual ☐ Attorney in Fact☐ Trustee ☐ Guardian or Conservator☐ Other: _____

Signer Is Representing: _____

Signer's Name: _____

☐ Corporate Officer — Title(s): _____☐ Partner — ☐ Limited ☐ General☐ Individual ☐ Attorney in Fact☐ Trustee ☐ Guardian or Conservator☐ Other: _____

Signer Is Representing: _____

Terry Lloyd Deposition Errata Sheet

Page:Line	Existing Testimony	Corrected Testimony
7:3	"plaintiff's counsel's fees"	"plaintiffs' counsel's fees"
7:22	"I have done damage calculations"	"I have done damages calculations"
10:20	"that has highing and notes on it"	"that has highlighting and notes on it"
12:1	"lawyers on the plaintiff's side"	"lawyers on the plaintiffs' side"
12:5	"plaintiff's side"	"plaintiffs' side"
14:10-11	"which cases you involved in"	"which cases you were involved in"
14:12	"a list in front of. Could"	"a list in front of you, could"
23:7	"couldn't say of certainty"	"couldn't say with certainty"
31:4	"The questions is"	"The question is"
32:11	"things like. I have"	"things like that. I have"
38:5	"individuals with target"	"individuals, with target"
38:18-20	"including plaintiff's complaint documents, documents produced in discovery, and the report of Professor Turow."	"including plaintiffs' complaint, documents produced in discovery, and the report of Professor Turow."
39:4	"with accurate and source data."	"with accurate and sourced data."
40:21	"use cases at CLEAR"	"use cases of CLEAR"
58:10	"restatement"	"Restatement"
58:11	"restatement"	"Restatement"
61:4	"restatement"	"Restatement"
64:14	"restatement"	"Restatement"
64:20	"restatement"	"Restatement"
67:8	"restatement"	"Restatement"
68:21	"Unjust enrichment"	"Unjust Enrichment"
59:2	"Schweize [phonetic]"	"Schweihs"
70:9	"Nancy Fannin [phonetic]"	"Nancy Fannon"
103:21	"adieu"	"ado"
104:8	"you're"	"your"
119:10	"I'll use will California-apportioned"	"I'll use California-apportioned"
123:15	"that finally"	"that finely"
127:11	"clear"	"CLEAR"
131:12	"shows that you 80 percent"	"shows you that 80 percent"
161:5	"of these Zeke pivot"	"of this Zeke pivot"
164:9	"domicile there or that all the usages were from there"	"domiciled there or that all the usages from there"
168:4	"plaintiff's lawyer"	"plaintiffs' lawyer"
174:5	"and alls I'm"	"and all I'm"
195:8	"CLEAR"	"clear"
228:17	"CLEAR deliveries some"	"CLEAR delivers some"
230:9	"digital product"	"digital products"

239:3	"Is what is a 'skip customer'"	"And what is a 'skip customer'"
265:2	"That sentence speak for himself."	"That sentence speaks for itself."
265:22	"unjust enrichments"	"unjust enrichment"
274:14	"CLEAR's customer's preferences"	"CLEAR's customers' preferences"