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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

**[PROPOSED] ORDER GRANTING
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL CONFIDENTIAL
INFORMATION REGARDING
DEFENDANT THOMSON REUTERS'
MOTION TO EXCLUDE TESTIMONY OF
FINANCE SCHOLARS GROUP, INC.
(DR. TERRY LLOYD)
(CIV. L.R. 7-11 AND 79-5)**

Judge: Hon. Edward M. Chen

[PROPOSED] ORDER

The Court, having considered Defendant Thomson Reuters' Administrative Motion to File Under Seal Confidential Information Regarding its Motion to Exclude Testimony of Finance Scholars Group, Inc. (Dr. Terry Lloyd) ("Sealing Motion"); the Omnibus Declaration of Hayden M. Schottlaender in Support of TR's (1) Motion to Exclude Testimony of Plaintiffs' Expert Professor Joseph Turow and (2) Motion to Exclude Testimony of Plaintiffs' Expert Finance Scholars Group, Inc. (Dr. Terry Lloyd) ("Schottlaender Declaration"); the previously filed Declaration of Kevin Appold in Support of TR's Administrative Motion to File Under Seal Confidential Information related to its Opposition to Plaintiffs' Motion for Class Certification ("Appold Sealing Declaration") (Doc. 150-3); the Stipulated Protective Order entered in this action (Doc. 70); and all pleadings and papers on file, hereby finds that good cause and compelling reasons exist to seal:

As identified in Table 1 to the Sealing Motion, the following portions of Thomson Reuters' Motion to Exclude Testimony of Finance Scholars Group, Inc. (Dr. Terry Lloyd) and the following portions of Exhibit 1 to the Schottlaender Declaration.

Cite	Portion(s) to Seal
Motion (2:7)	After "Over the period Dr. Lloyd analyzed, recurring revenue made up more than" and before "of TR's revenue"
Motion (2:8)	After "from CLEAR, while transactional revenue accounted for just under" and before " <i>See id.</i> at 3."
Motion (3:2)	Table excerpted from FSG / Dr. Lloyd Expert Report, first row titled: "Revenues" (all data/information contained under columns 2017-2021)
Motion (3:4)	Table excerpted from FSG / Dr. Lloyd Expert Report, third row titled: "CLEAR US Revenues" (all data/information contained under columns 2017-2021)
Motion (3:7)	Table excerpted from FSG / Dr. Lloyd Expert Report, fifth row titled: "CLEAR California Revenues" (all data/information contained under columns 2017-2021)
Motion (3:8)	Table excerpted from FSG / Dr. Lloyd Expert Report, sixth row titled: "California Natural Persons" (all data/information contained under columns 2017-2021)

Cite	Portion(s) to Seal
Motion (3:10)	Table excerpted from FSG / Dr. Lloyd Expert Report, seventh row titled: "CLEAR California Revenues / Persons" (all data/information contained under columns 2017-2021)
Motion (5:7)	After "Dr. Lloyd therefore concluded that plaintiffs are entitled to" and before "of his calculated revenue"
Motion (10:17)	After "TR realizes a" and before "profit margin from operating CLEAR."
Schottlaender Decl. Ex. 1	Lloyd Dep. at 61:18 (beginning of line and before "million.")

IT IS SO ORDERED.

DATED: _____

Judge: Hon. Edward M. Chen
United States District Judge

Submitted by:

PERKINS COIE LLP

By: /s/ Hayden M. Schottlaender
Hayden M. Schottlaender

Attorneys for Defendant
Thomson Reuters Corporation