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

[PROPOSED] ORDER GRANTING DEFENDANT'S MOTION TO EXCLUDE TESTIMONY OF JOSEPH TUROW

[PROPOSED] ORDER

Defendant Thomson Reuters has filed a Motion to Exclude the Testimony of Plaintiffs' Expert, Joseph Turow (the "Motion"). Plaintiffs oppose that Motion. Having considered the Motion, Plaintiffs' Opposition, and all associated briefing, documents, and evidence on the record at the time of this Order, Defendant's Motion is hereby GRANTED. The Court finds that the opinion offered by Professor Joseph Turow fails to meet the criteria of Federal Rule of Evidence 702. Prof. Turow's testimony constitutes mere personal opinion and is not supported by scientifically valid principles. *Daubert v. Merrell Dow Pharms., Inc.*, 43 F.3d 1311, 1319 (9th Cir. 1995). His testimony and report to date are therefore excluded.

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