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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

OMNIBUS DECLARATION OF HAYDEN M. SCHOTTLAENDER IN SUPPORT OF DEFENDANT THOMSON REUTERS CORPORATION'S:

(1) MOTION TO EXCLUDE TESTIMONY OF PLAINTIFFS' EXPERT FINANCE SCHOLARS GROUP, INC. (DR. TERRY LLOYD)

(2) MOTION TO EXCLUDE TESTIMONY OF PLAINTIFFS' EXPERT JOSEPH TUROW

Hon. Edward M. Chen

I, Hayden M. Schottlaender, declare as follows:

1. I am an attorney with the law firm of Perkins Coie LLC and counsel 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 1** is a true and correct copy of excerpts from the transcript of the deposition of Terry Lloyd, taken on August 22, 2022.

3. Attached as **Exhibit 2** is a true and correct screen capture of the webpage located at URL https://ucr.fbi.gov/crime-in-the-u.s/2018/crime-in-the-u.s.-2018/topic-pages/tables/table-69, which was captured at my direction on August 18, 2022 and was marked and used as Exhibit F5 at the Deposition of Plaintiffs' expert Terry Lloyd, taken on August 22, 2022.

4. Attached as **Exhibit 3** is a true and correct screen capture of webpage located at URL https://ucr.fbi.gov/crime-in-the-u.s/2018/crime-in-the-u.s.-2018/tables/table-69/table-69.xls/@@template-layout-view?override-view=data-declaration, which was captured at my direction on August 18, 2022 and was marked and used as Exhibit F6 at the Deposition of Plaintiffs' expert Terry Lloyd, taken on August 22, 2022.

5. Attached as **Exhibit 4** is a true and correct copy of excerpts from the transcript of the deposition of Joseph Turow, taken on August 26, 2022.

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

Executed February 6, 2023, in Dallas, Texas.

By: s/ *Hayden M. Schottlaender*
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