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UNITED STATES DISTRICT COURT FOR THE 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-KAW

DECLARATION OF ANDRE M. MURA IN SUPPORT OF PLAINTIFFS' ADMINISTRATIVE MOTION TO CONSIDER WHETHER ANOTHER PARTY'S MATERIALS SHOULD BE SEALED

Hon. Edward M. Chen

I, Andre M. Mura, declare under penalty of perjury:

1. I am a member in good standing of the Bar of California and the bar of this Court. I am a partner at Gibbs Law Group LLP in Oakland, California, and represent Plaintiffs in this matter.

2. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently to them.

3. I submit this declaration in support of Plaintiffs' Administrative Motion to Consider Whether Another Party's Material Should Be Sealed.

4. Pursuant to Local Rule 79-5(f), I hereby state that the following documents, which are exhibits to the Declaration of Andre M. Mura in Support of Plaintiffs' Omnibus Motion to Exclude Expert Opinions on Class Certification ("Motion"), have been designated as "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY" by Defendant under the operative Stipulated Protective Order in this action. *See* ECF No. 70:

Exhibit to Mura Declaration in Support of Plaintiffs' Motion	Portion Designated as "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY" by Defendant
Ex. 1	26:19-27:2; 27:16-28:5; 40:5-40:23; 41:18-41:20

5. The following portions of Plaintiffs' Omnibus Motion to Exclude Expert Opinions on Class Certification quote from or otherwise refer to the exhibits referenced in Paragraph 4 above and so may also be potentially considered confidential by Defendant:

Portion of Plaintiffs' Motion
Page 9, line 27 (between "generating" and "of")

6. The following portions of Plaintiffs' Motion to Exclude quote from or otherwise refer to expert reports that were submitted under seal by Defendant and so may also be potentially considered confidential by Defendant:

Provisionally Sealed Portion of Motion
Page 3, lines 9-10 (between "here" and end of sentence)
Page 3, lines 11-12 (between "harms" and end of sentence)
Page 3, lines 12-14 (between "that" and end of sentence)
Page 3, lines 14-15 (between "fourth," and end of sentence)
Page 4, lines 1-2 (between "that" and end of sentence)
Page 4, lines 4-5 (from start of line to end of sentence)
Page 4, line 5 (between "of" and "is")
Page 4, lines 21-22 (between "case" and end of sentence)
Page 5, line 8 (between "Kivetz's" and end of line)
Page 6, line 13 (between "mischaracterizes as a" and "only")
Page 6, line 13 (between "necessitates" and end of sentence)
Page 6, lines 14-16 (between "show that" to end of sentence)
Page 6, lines 18-20 (between "why" to "or know")
Page 7, line 16 (between "consumers'" and "when Californians")
Page 8, line 19 (from beginning of line to "with the implication")
Page 8, lines 25-26 (between "marketplace," to "ECF No. 151-14")
Page 8, line 27 (from beginning of line to end of sentence)
Page 9, lines 4-6 (from "speculate that" to end of sentence)
Page 10, line 11 (between "survey by" and "—without")
Page 10, lines 14-15 (between "questions such as" and "without offering")
Page 10, lines 22.5-23.5 (from "arguing that because" to end of sentence)
Page 11, lines 12-13 (between "Turow" to "and that")
Page 11, line 13 (between "position is" and "and")
Page 11, line 13 (from "and" to end of sentence)
Page 14, lines 4-6 (quotation in parenthetical)

I declare that the foregoing is true and correct. Executed on February 6, 2022, in Oakland, California.

/s/ Andre M. Mura
Andre M. Mura