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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

**DECLARATION OF DR. RAN KIVETZ IN
SUPPORT OF THOMSON REUTERS'
STATEMENT IN RESPONSE TO
PLAINTIFFS' ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIALS
SHOULD BE SEALED**

I, Dr. Ran Kivetz, declare as follows:

1. I am the Philip H. Geier, Jr., Professor of Marketing at Columbia University Business School. I was asked by counsel for Thomson Reuters Corporation to provide an opinion in the above-captioned case. I make this declaration based upon personal knowledge and if called upon to do so I could and would testify competently to the facts set forth herein.

2. On October 11, 2022, I was deposed in connection with the above-captioned action. Counsel for Plaintiffs asked me to answer several questions regarding my personal finances, and the finances for the company through which I provide expert services. Thereafter, Plaintiffs included information and excerpts from that deposition testimony to support their Omnibus Motion to Exclude Defendant's Expert Opinions on Class Certification ("*Daubert* Motion") (Doc. 158-3).

3. The disclosure of the materials described in the table below would cause harm to me because they reflect detailed information about my personal finances. This financial information is not publicly known. The resultant harm would be financial, including because my current and future sources of income might make decisions based on the totality of my income. The public disclosure of my private finances could also significantly impact my professional opportunities with respect to present and future employment, engagement, and promotion decisions. There may also be social repercussions from the public disclosure of my personal finances to my friends, family, colleagues, and community. Finally, I am concerned that the information is misleading, particularly because it is offered without important context.

Cite	Portion(s) to Seal
Dkt. 158-3 Pls. Brief (9:27)	FN 5: After "But while a lucrative practice (generating" and before "of dollars a year),"
Dkt. 158-4 Mura Decl. Ex. 1	Kivetz Dep. at 27:16-28:5
Dkt. 158-4 Mura Decl. Ex. 1	Kivetz Dep. at 40:5-23
Dkt. 158-4 Mura Decl. Ex. 1	Kivetz Dep. at 41:18-20

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

2 Executed on February ¹⁰, 2023, in New York.

3 DocuSigned by:
4 
5 A8E5CED53B57466...
6 Dr. Ran Kivetz