

EXHIBIT 1

8/26/2022

Cat Brooks and Rasheed Shabazz, et al. v. Thomson Reuters Corp.
Confidential

Joseph Turow, Ph.D.

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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,	)	
	)	Case No.
Plaintiffs,	)	3:21-cv-01418-EMC
	)	
-vs-	)	
	)	
THOMSON REUTERS	)	
CORPORATION,	)	
	)	
Defendant.	)	
	)	

****CONFIDENTIAL****
VIDEOTAPED DEPOSITION
TAKEN REMOTELY VIA VIDEOCONFERENCE
OF
JOSEPH TUROW, PH.D.
AUGUST 26, 2022
11:03 A.M.

REPORTED BY:
DEBRA SAPIO LYONS, RDR, CRR, CRC, CCR, CLR, CPE

DIGITAL EVIDENCE GROUP
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2 Videotaped deposition, taken remotely via
3 videoconference, of Joseph Turow, Ph.D., reported
4 remotely via Zoom Videoconference by Debra Sapio
5 Lyons, a Registered Diplomat Reporter, a Certified
6 Realtime Reporter, a Certified Realtime Captioner,
7 a Certified LiveNote Reporter, an Approved Reporter
8 of the United States District Court for the Eastern
9 District of Pennsylvania, a Certified Court
10 Reporter of the State of New Jersey, a Notary
11 Public of the States of New Jersey, Delaware and
12 the Commonwealth of Pennsylvania.

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1 (All Counsel and Participants present via Zoom
2 videoconference.)

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21 ALSO PRESENT:

HENRY MARTE, VIDEOGRAPHER/DOCUMENT TECH
22 DIGITAL EVIDENCE GROUP

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1 control their information and as consequence it
2 is -- it is harming their privacy rights. Whether
3 there is some individual somewhere who might say
4 that, in your hypothetical world, that a particular
5 type of data is okay, is something that is a
6 question and I would frankly doubt that there are
7 people out there. But that's not what I'm asked to
8 opine about.

9 Q. That's fine. I want to just make sure
10 I've got the scope of your testimony in this case.
11 And just for clarity, I'm going to ask the question
12 again.

13 Is it your testimony in this case that
14 every person in California would object to their
15 information being in CLEAR?

16 MS. ZEMAN: Objection, asked and
17 answered.

18 THE WITNESS: And I'm -- I'm saying
19 that that's not what I asked -- that's not
20 what I'm asked to be -- opine about.

21 BY MS. FAHRINGER:

22 Q. Okay. So that's not your opinion in

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1 this case; correct?

2 A. It's not what I've written about.

3 Q. And your opinion is reflected in your
4 in your opinion that is --

5 A. The larger point is it's not what --
6 that point does not affect my conclusion.

7 Q. Okay. That's fine.

8 A. Whatever I say about that point does
9 not affect my conclusion.

10 Q. And, in fact, you are not offering an
11 opinion in this case with respect to actual people
12 in California, and more specifically, you're not
13 offering an opinion in this case that every person
14 in California would object to their information
15 being available in CLEAR; is that fair?

16 A. I am offering the opinion based on
17 research that the huge proportion of Americans
18 including Californians want to control the
19 information companies have about them.

20 In the case of CLEAR, people don't even
21 know of its existence. My sense is that if you
22 told people what -- what is in my report, they

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1 CERTIFICATE

2 I, Debra Sapio Lyons, a Registered
3 Diplomat Reporter, a Certified Realtime Reporter, a
4 Certified Realtime Captioner, an Approved Reporter
5 of the United States District Court for the Eastern
6 District of Pennsylvania, a Certified Court
7 Reporter for the State of New Jersey; and Notary
8 Public do hereby certify:

9 That Joseph Turow, Ph.D., the witness
10 whose deposition is hereinbefore set forth,
11 appeared remotely via Zoom videoconference, was
12 remotely sworn by me and that such deposition is a
13 true record of the testimony given by such witness,
14 to the best of my ability and thereafter reduced to
15 typewriting under my direction.

16 I further certify that I am not related to
17 any of the parties to this action by blood or
18 marriage and that I am in no way interested in the
19 outcome of the matter.

20 In witness whereof, I have hereunto set my
21 hand this 1st day of September, 2022.

22


DEBRA SAPIO LYONS
CRR, RDR, CCR, CPE