

Eric H. Gibbs (SBN 178658)
Andre M. Mura (SBN 298541)
Amy M. Zeman (SBN 273100)
Mark H. Troutman (*pro hac vice*)
Ezekiel S. Wald (SBN 341490)
Hanne Jensen (SBN 336045)
GIBBS LAW GROUP LLP
1111 Broadway, Suite 2100
Oakland, CA 94607
Telephone: (510) 350-9700
Facsimile: (510) 350-9701
ehg@classlawgroup.com
amm@classlawgroup.com
amz@classlawgroup.com
mht@classlawgroup.com
zsw@classlawgroup.com
hj@classlawgroup.com

Geoffrey A. Graber (SBN 211547)
Karina G. Puttieva (SBN 317702)
**COHEN MILSTEIN SELLERS & TOLL
PLLC**
1100 New York Ave. NW, Fifth Floor
Washington, DC 20005
Telephone: (202) 408-4600
Facsimile: (202) 408-4699
ggraber@cohenmilstein.com
kputtieva@cohenmilstein.com

Attorneys for Plaintiffs and the Proposed Class

**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

**PLAINTIFFS' ADMINISTRATIVE MOTION
TO CONSIDER WHETHER ANOTHER
PARTY'S MATERIALS SHOULD BE
SEALED**

Hon. Edward M. Chen

Pursuant to Civil Local Rule 79-5(f) and the Stipulated Protective Order entered by the Court on December 17, 2021 (ECF No. 70), Plaintiffs request that the Court consider whether material designated as “CONFIDENTIAL” or “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY” should be filed under seal. Specifically, Defendant has designated as “CONFIDENTIAL” or “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY” the following exhibits to Andre M. Mura’s Declaration in Support of Plaintiffs’ Opposition to Defendant’s Motion to Exclude Expert Testimony of Finance Scholars Group, Inc. (Terry Lloyd):

Exhibit	Document	Provisionally Sealed Portion(s)	Evidence Offered in Support of Sealing
Ex. 1	Kidder Deposition	43:13-43:23	Def. to provide evidence per Local Rule 79-5(f)
Ex. 2	Defendant’s Fourth Supplemental Answers & Objections to Plaintiffs’ First Interrogatories	Entire document	Def. to provide evidence per Local Rule 79-5(f)

The following portions of Plaintiffs’ Opposition to Defendant’s Motion to Exclude Expert Testimony of Finance Scholars Group, Inc. (Terry Lloyd) (“Lloyd Opposition”) quote from or otherwise refer to the above exhibits and so may also be potentially considered confidential by Defendant:

Provisionally Sealed Portion of Lloyd Opposition	Evidence Offered in Support of Sealing
Page 8, line 22 (between “to be” and “TR”)	Def. to provide evidence per L.R. 79-5(f)
Page 8, line 22.5 (between “with a” and “search”)	Def. to provide evidence per L.R. 79-5(f)
Page 8, line 22.5 (between “field” and “percent”)	Def. to provide evidence per L.R. 79-5(f)
Page 8, line 23.5 (between “summing” and “column”)	Def. to provide evidence per L.R. 79-5(f)
Page 8, lines 23.5-24 (between “sum of” and “column”)	Def. to provide evidence per L.R. 79-5(f)

The following portions of Plaintiffs’ Lloyd Opposition quote from or otherwise refer to expert reports that were submitted under seal or designated under the parties’ protective order by Defendant and so may also be potentially considered confidential by Defendant:

Provisionally Sealed Portion of Lloyd Opposition	Evidence Offered in Support of Sealing
Page 2, line 14 (between “there was a” and “between”)	Def. to provide evidence per L.R. 79-5(f)
Page 2, line 17 (between “that if” and “of CLEAR’s”)	Def. to provide evidence per L.R. 79-5(f)
Page 2, line 18 (between “and” and “were”)	Def. to provide evidence per L.R. 79-5(f)
Page 2, line 22 (between “were” and “then”)	Def. to provide evidence per L.R. 79-5(f)
Page 6, lines 16-17 (entire parenthetical following “¶¶ 113-14”)	Def. to provide evidence per L.R. 79-5(f)
Page 6, line 22 (between “To be” and “Kidder”)	Def. to provide evidence per L.R. 79-5(f)
Page 6, line 23 (between “allocated” and end of sentence)	Def. to provide evidence per L.R. 79-5(f)
Page 8, line 10 (between “about” and “of CLEAR’s”)	Def. to provide evidence per L.R. 79-5(f)
Page 8, line 11 (between “and” and “are”)	Def. to provide evidence per L.R. 79-5(f)
Page 8, line 13 (between “them” and “to account”)	Def. to provide evidence per L.R. 79-5(f)

Pursuant to Local Rule 79-5(f)(3), Defendant, as the Designating Party, bears the responsibility to establish that its designated materials are sealable. Plaintiffs provisionally file these documents under seal to give Defendant an opportunity to specify any reasons for keeping the documents under seal pursuant to Local Rule 79-5(c).

DATED: March 6, 2023

Respectfully submitted,

/s/ Andre M. Mura

Andre M. Mura

Eric H. Gibbs (SBN 178658)
 Andre M. Mura (SBN 298541)
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 Oakland, California 94607
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 Facsimile: (510) 350-9701
 ehg@classlawgroup.com
 amm@classlawgroup.com
 amz@classlawgroup.com
 mht@classlawgroup.com

zsw@classlawgroup.com
hj@classlawgroup.com

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Facsimile: (202) 408-4699
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