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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

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

Case No. 3:21-cv-01418-EMC-KAW

I, Andre M. Mura, declare:

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' Opposition to Defendant's Motion to Exclude Expert Testimony of Finance Scholars Group, Inc. (Terry Lloyd) 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:

Exhibits	Portion Designated as "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY" by Defendant
Ex. 1 (Kidder Depo.)	43:13-43:23
Ex. 2 (Def.'s Fourth Supp. Answers & Objections to Pls.' First Interrogatories)	Entire document

5. 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 exhibits referenced in Paragraph 4 above and so may also be potentially considered confidential by Defendant:

Provisionally Sealed Portion of Lloyd Opposition
Page 8, line 22 (between "to be" and "TR")
Page 8, line 22.5 (between "with a" and "search")
Page 8, line 22.5 (between "field" and "percent")
Page 8, line 23.5 (between "summing" and "column")
Page 8, lines 23.5-24 (between "sum of" and "column")

6. 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	
Page 2, line 14 (between "there was a" and "between")	
Page 2, line 17 (between "that if" and "of CLEAR's")	
Page 2, line 18 (between "and" and "were")	
Page 2, line 22 (between "were" and "then")	
Page 6, lines 16-17 (entire parenthetical following "¶¶ 113-14")	
Page 6, line 22 (between "To be" and "Kidder")	
Page 6, line 23 (between "allocated" and end of sentence)	
Page 8, line 10 (between "about" and "of CLEAR's")	
Page 8, line 11 (between "and" and "are")	
Page 8, line 13 (between "them" and "to account")	

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

/s/ Andre M. Mura

Andre M. Mura