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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 Supporting Plaintiffs' Reply in Support of Plaintiffs' Motion for Class Certification ("Reply"), 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 (Gerhard Dep.)	Entire document

5. The following portions of Plaintiffs' Reply 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 Reply
Page 1, line 12 (between "CLEAR had" and "—which")
Page 1, line 12 (between "potentially" and "and")
Page 1, line 13 (between "and" and "information")
Page 1, line 13 (between "that" and end of sentence)

6. The following portions of Plaintiffs' Reply quote from or otherwise refer to expert reports or other documents that were submitted under seal or designated under the parties' protective order by Defendant and so may also be potentially considered confidential by Defendant:

DECLARATION OF ANDRE M. MURA IN SUPPORT OF PLAINTIFFS' ADMINISTRATIVE
MOTION TO CONSIDER WHETHER ANOTHER PARTY'S MATERIALS SHOULD BE
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Case No. 3:21-cv-01418-EMC-KAW

Provisionally Sealed Portion of Reply	
Page 10, lines 15-17 (entire sentence)	
Page 10, lines 17-18 (between “benefits” and end of parenthetical)	
Page 10, lines 18-19 (between “benefits as” and end of parenthetical)	
Page 10, lines 19-20 (entire parenthetical)	
Page 10, lines 21-22 (between “claiming” and end of parenthetical)	
Page 10, lines 22-23 (entire parenthetical)	
Page 10, lines 23-25 (between “benefits from” and end of parenthetical)	
Page 10, lines 27-27.5 (between “suggests” and “based on”)	
Page 10, line 27.5 (between “based on” and “due to”)	
Page 10, line 27.5 (between “due to” and end of sentence)	
Page 11, line 13 (between “keep” and “of dollars”)	

I declare that the foregoing is true and correct. Executed on March 9, 2022, in Oakland, California.

/s/ Andre M. Mura

Andre M. Mura

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