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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-1418-EMC-KAW

**STIPULATION TO PERMANENTLY
REMOVE INCORRECTLY FILED
DOCUMENT (ECF NO. 168) AND
[PROPOSED] ORDER**

Judge: Hon. Edward M. Chen

**STIPULATION TO PERMANENTLY REMOVE INCORRECTLY FILED DOCUMENT (ECF NO.
168) AND [PROPOSED] ORDER**
Case No. 3:21-cv-1418-EMC-KAW

1 Plaintiffs and Defendant hereby stipulate to permanently remove the following document from
2 the ECF system for the Northern District of California, subject to the Court's approval:

3 **ECF No. 168: OPPOSITION/RESPONSE (re 157 Administrative Motion to File**
4 **Under Seal Confidential Information Regarding Defendant Thompson Reuters's**
5 **Motion to Exclude Testimony of Finance Scholars Group, Inc. (Dr. Terry Lloyd))**
6 **PLAINTIFFS OPPOSITION TO DEFENDANTS MOTION TO EXCLUDE**
7 **EXPERT TESTIMONY OF FINANCE SCHOLARS GROUP, INC. (TERRY**
8 **LLOYD) [REDACTED].**

9
10 On March 6, 2023, counsel for Plaintiffs inadvertently filed this document with the provisional
11 redaction of one word missing. Per Plaintiffs' request, the ECF helpdesk has now locked the document
12 in question pending the Court's order to remove it from the record. The parties agree that Plaintiffs
13 should file a corrected version of this document including all redactions ordered by the Court
14 (including, if so ordered, the above redaction) and also removing redactions from text that Thomson
15 Reuters does *not* seek to seal, no later than three court days after the Court enters such an Order. *See*
16 ECF No. 171 (Thomson Reuters' statement in support of sealing). Other documents before the Court,
17 such as the pending motion to seal and proposed order, are unaffected. *See* ECF No. 167.

18 Accordingly, the parties stipulate, subject to Court approval, that ECF No. 168 shall be
19 permanently removed from the ECF system for the Northern District of California.

1 DATED: March 10, 2023

GIBBS LAW GROUP LLP

2
3 By: /s/ Andre M. Mura

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DATED: March 10, 2023

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By: /s/ Anna M. Thompson

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[PROPOSED] ORDER

PURSUANT TO STIPULATION AND FOR GOOD CAUSE SHOWN, IT IS ORDERED that ECF No. 168 shall be permanently removed from the ECF system for the Northern District of California. Plaintiffs shall file a corrected version of this document including all redactions ordered by the Court (including, if so ordered, the above redaction) and also removing redactions from text that Thomson Reuters does not seek to seal, no later than three court days after the Court enters such an Order.

DATED:

EDWARD M. CHEN
United States District Judge

ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from the other signatory.

/s/ Andre M. Mura