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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,

Plaintiffs,

v.

THOMSON REUTERS CORPORATION,

Defendant.

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

[PROPOSED] ORDER RE PLAINTIFFS' ADMINISTRATIVE MOTION TO CONSIDER WHETHER ANOTHER PARTY'S MATERIALS SHOULD BE SEALED (DOC. 169)

[PROPOSED] ORDER

The Court, having considered Plaintiffs' Administrative Moton to Consider Whether Another Party's Materials Should be Sealed (Doc. 169) and all supporting materials thereto, and having considered Defendant Thomson Reuters' Statement in Response and all supporting materials thereto, including the Third Sealing Declaration of Kevin Appold, finds that good cause and compelling reasons exist to seal:

The following portions of the Reply in Support of Plaintiffs' Motion for Class Certification (Doc. 169-3) and the following portions of Exhibit 1 to the Declaration of Andre Mura in support thereof (Doc. 169-4):

Cite	Portion(s) to Seal
Doc. 169-3 Pls. Reply (1:12)	Page 1, line 12 (after "CLEAR had" and before "—which")
Doc. 169-3 Pls. Reply (1:12)	Page 1, line 12 (after "potentially" and before "and")
Doc. 169-3 Pls. Reply (1:13)	Page 1, line 13 (beginning of line and before "information that")
Doc. 169-4 Mura Decl. Ex. 1	Gerhard Dep. at at 255:6 (after "Subject is" to end of line 6)
Doc. 169-4 Mura Decl. Ex. 1	Gerhard Dep. at 255:8-10 (after "The attachment, which is forwarded," to end of line 10)
Doc. 169-4 Mura Decl. Ex. 1	Gerhard Dep. at 255:13-17 (after "Okay. And it reads," to end of line 17)
Doc. 169-4 Mura Decl. Ex. 1	Gerhard Dep. at 257:5-7 (after "So he forwards you this" to end of line 7)
Doc. 169-4 Mura Decl. Ex. 1	Gerhard Dep. at 257:9-10 (after "Do you have an understanding of what a" and before "based on this communication from")
Doc. 169-4 Mura Decl. Ex. 1	Gerhard Dep. at 257:13-16 (after "this is regarding a" to end of line 16)
Doc. 169-4 Mura Decl. Ex. 1	Gerhard Dep. at 257:18-19 (after "How often does Thomson Reuters" to end of line 19)
Doc. 169-4 Mura Decl. Ex. 1	Gerhard Dep. at 257:24-25 (entire lines)

Cite	Portion(s) to Seal
Doc. 169-4 Mura Decl. Ex. 1	Gerhard Dep. at 258:2 (after "particular vendor," to end of line 2)
Doc. 169-4 Mura Decl. Ex. 1	Gerhard Dep. at 258:14 (beginning of line and before "considered to be proprietary?")
Doc. 169-4 Mura Decl. Ex. 1	Gerhard Dep. at 258:24 (after "Is data from a" and before "proprietary?")
Doc. 169-4 Mura Decl. Ex. 1	Gerhard Dep. at 261:25 (after "Subject is" and before "is that right?")
Doc. 169-4 Mura Decl. Ex. 1	Gerhard Dep. at 262:2-18 (after "And it reads," to end of line 18)
Doc. 169-4 Mura Decl. Ex. 1	Gerhard Dep. at 263:11-12 (after "And it says here," to end of line 12)
Doc. 169-4 Mura Decl. Ex. 1	Gerhard Dep. at 263:13-15 (after "What is" to end of line 15)
Doc. 169-4 Mura Decl. Ex. 1	Gerhard Dep. at 263:18-22 (after "we did meet with" to end of line 22)
Doc. 169-4 Mura Decl. Ex. 1	Gerhard Dep. at 263:23-24 (after "The email states that" and before "correct?")
Doc. 169-4 Mura Decl. Ex. 1	Gerhard Dep. at 263:25–264:1 (after "Yeah. I guess with" to end of line 1)
Doc. 169-4 Mura Decl. Ex. 1	Gerhard Dep. at 264:18 (after "The subject is" to end of line 18)
Doc. 169-4 Mura Decl. Ex. 1	Gerhard Dep. at 264:20 (after "What is" to end of line 20)
Doc. 169-4 Mura Decl. Ex. 1	Gerhard Dep. at 264:21-22 (after "That would be a meeting to discuss" to end of line 22)
Doc. 169-4 Mura Decl. Ex. 1	Gerhard Dep. at 265:4-7 (entire lines)
Doc. 169-4 Mura Decl. Ex. 1	Gerhard Dep. at 265:9-10 (after "And how would" to end of line 10)
Doc. 169-4 Mura Decl. Ex. 1	Gerhard Dep. at 265:18-22 (after "would be around" to end of line 22)
Doc. 169-4 Mura Decl. Ex. 1	Gerhard Dep. at 266:18 (after "The subject is" to end of line 18)

Cite	Portion(s) to Seal
Doc. 169-4 Mura Decl. Ex. 1	Gerhard Dep. at 266:20 (after "So you attended the" and before "webinar that's")
Doc. 169-4 Mura Decl. Ex. 1	Gerhard Dep. at 266:23 (after "attend the" and before "webinar. I -- like I don't have a")
Doc. 169-4 Mura Decl. Ex. 1	Gerhard Dep. at 267:2-10 (after "The email reads," to end of line 10)
Doc. 169-4 Mura Decl. Ex. 1	Gerhard Dep. at 267:12 (entire line)
Doc. 169-4 Mura Decl. Ex. 1	Gerhard Dep. at 267:15-16 (after "And the first key takeaway is," to end of line 16)
Doc. 169-4 Mura Decl. Ex. 1	Gerhard Dep. at 267:25–268:1 (entire lines)
Doc. 169-4 Mura Decl. Ex. 1	Gerhard Dep. at 268:6-8 (entire lines)
Doc. 169-4 Mura Decl. Ex. 1	Gerhard Dep. at 269:2-22 (entire lines)

IT IS SO ORDERED.

DATED: _____

_____
Judge: Hon. Edward M. Chen
United States District Judge

Submitted by:

PERKINS COIE LLP

By: */s/ Anna Mouw Thompson*
Anna Mouw Thompson

Attorneys for Defendant
Thomson Reuters Corporation