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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 GRANTING ADMINISTRATIVE MOTION TO FILE UNDER SEAL CONFIDENTIAL INFORMATION REGARDING THOMSON REUTERS' OBJECTION TO NEW REPLY EVIDENCE

[PROPOSED] ORDER

The Court, having considered Thomson Reuters' Administrative Motion to File Under Seal Confidential Information ("Sealing Motion"), and all supporting materials thereto, including the Third Sealing Declaration of Kevin Appold, Doc.173-2, ("Third Sealing Declaration); the Stipulated Protective Order entered in this action, Doc. 70; and all pleadings and papers on file hereby finds that good cause and compelling reasons exist to seal:

The following portions of Thomson Reuters' Objection to New Reply Evidence:

Cite	Portion(s) to Seal
Objection to Reply (1:6)	Page 1, line 6 (after "includes allegations about CLEAR having" and before cite to footnote 3)
Objection to Reply (1:9)	Page 1, line 9 (after "TR objects to Plaintiffs' new argument and evidence about" and before "under Local")
Objection to Reply (1:11)	Page 1, line 11 (after "further objects that" and before "is irrelevant to Plaintiffs' case or to class certification and is")
Objection to Reply (1:14)	Page 1, line 14 (beginning of line and before "or anything of the sort.")
Objection to Reply (1:18)	Page 1, line 18 (after "had "no knowledge one way or the other" whether" and before "was ever indexed in CLEAR.")
Objection to Reply (1:19)	Page 1, line 19 (after "And, in fact," and before "was never made available to any CLEAR")
Objection to Reply (2:7)	Page 2, line 7 (after "for at least a limited time, CLEAR had" and before "–which includes potentially")
Objection to Reply (2:7)	Page 2, line 7 (after "–which includes potentially" to end of line 7)
Objection to Reply (2:8)	Page 2, line 8 (after "and" and before "information that cannot be accessed through normal internet channels.")
Objection to Reply (2:11)	Page 2, line 11 (after "The phrase" and before "does not appear once in either Plaintiffs' Complaint or their")
Objection to Reply (2:23-24)	Page 2, lines 23-24 (FN 5: after "TR never discusses" and before "in its opposition because")
Objection to Reply (2:24)	Page 2, line 24 (FN 5: after "in its opposition because" and before "was never offered through CLEAR and has never")

Cite	Portion(s) to Seal
Objection to Reply (2:24.5 - 25)	Page 2, lines 24.5-25 (after "Nor can Plaintiffs claim that the concept of" and before "is new to them and that they could not have discovered the issue sooner.")
Objection to Reply (2:25.5)	Page 2, line 25.5 (after "to TR's consideration of" and before "functionality (including those that were presented to Mr.")
Objection to Reply (3:3)	Page 3, line 3 (after "references to and arguments about" and before "under Local Rule 7-3(d)(1).")
Objection to Reply (3:7)	Page 3, line 7 (after "Because anything regarding" and before "is new")
Objection to Reply (3:9)	Page 3, line 9 (after "TR also objects that the new evidence regarding" and before "is irrelevant.")
Objection to Reply (3:19)	Page 3, line 19 (beginning of line and before "has no connection to this litigation.")
Objection to Reply (3:21)	Page 3, line 21 (after "what types of" and before "may be at issue, what")
Objection to Reply (3:21)	Page 3, line 21 (after "may be at issue, what" and before "even is, why TR explored")
Objection to Reply (4:6)	Page 4, line 6 (after "customers" and before "*See, e.g.,* Doc. 169-4, 258:4-13.")
Objection to Reply (4:7)	Page 4, line 7 (after "CLEAR does not include" and before "currently, Doc 169-4, 268:17-23;")
Objection to Reply (4:9)	Page 4, line 9 (after "CLEAR, id. at 262:5-263:8; and he had "no knowledge" whether" and before "was ever made")
Objection to Reply (4:12)	Page 4, line 12 (after "never made" and before "available to customers.")

IT IS SO ORDERED.

DATED: March 28, 2023



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