EXHIBIT 1

REDACTED - PUBLICLY FILED VERSION OF DOC. 157-7
PURSUANT TO COURT ORDER,
DATED MARCH 21, 2023 (DOC. 179)

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

CAT BROOKS and RASHEED SHABAZZ, individually and on behalf of all others similarly situation,	
Plaintiffs,	Civil No. 3:21-cv-01418-EMC
v.	
THOMSON REUTERS CORPORATION,	Hon. Edward M. Chen
Defendant.	

DEPOSITION OF TERRY LLOYD

August 22, 2022 9:18 a.m.

Location: DEPOSITION BY VIDEOCONFERENCE

Reported by:

HEIDI HUNTER, RPR, CSR

DIGITAL EVIDENCE GROUP

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We go into some detail defining incremental cost, incremental profit, variable costs, things like that. And, again, I realize these aren't maybe things people are comfortable with or know from every day experience, and I apologize if I wasn't sufficiently clear, no pun intended, on the explanation of the calculations.

But our approach, our work was to identify a reliable framework and then follow that framework through with a calculation based on the best available data to date as the date of the report.

Q (By Mr. Schottlaender) Could you describe again the measure of -- you used the phrase "measure of unjust enrichment," and I'm wondering what that mean to you. What is the measure of unjust enrichment?

A I may have conflated two terms. But what we're calculating is the measure of damages, and that is unjust enrichment which we have calculated as the incremental or marginal profit on the use of data for California natural persons by CLEAR.

Q Are the terms "incremental" and "marginal profit," are those synonymous?

A Generally. And I'll refer to my report, at the bottom of page 7, I state: "The measure of profitability called 'net profit' by the Restatement" -- the source I quoted earlier in the report -- "and authorities is what an accountant or financial analyst would more likely call 'gross margin,' 'gross profit,' or 'incremental profit.'

"In other words, speaking generically rather than about CLEAR specifically, the concept refers to the difference between the sales price of additional units and the costs required to produce the additional units, that is the 'marginal' or 'incremental profit' from selling an additional unit."

For purposes of this report I have used them interchangeably. As I noted in the report, there might be variations depending on the user or the definition or the circumstances. Marginal, incremental, and variable in my mind for this purpose are synonymous, and I've used them that way here.

Q But the terms "gross profit" and "net profit" would not be synonymous to an accountant;

right?

A No, they -- no, sir, they would not -- well, depending on the accountant you spoke with, those are not synonymous under GAAP, or general accepted accounting principles.

There would be a rare case where a gross profit might be a net profit where somebody had no operational costs. There's also a whole other world in accounting for cannabis where the taxable profits are the gross profits and not the net profits.

So there will be some exceptions, but generally speaking, gross profit and net profit are different things.

Q And for the nonaccountant, can you explain the difference between gross profit and net profit.

A Let's start with a generic and go to specifics. Generally speaking, gross profit is the amount of profit that remains after you sell a thing.

I use in the report and in other places the example of a gallon of milk. If I go into the grocery store and buy a gallon of milk for $3 and it costs the grocery store 2.50 to get that gallon milk into the back of the refrigerated unit, their gross profit on that is 50 cents.

The net profit on that would have to reflect other operating costs like electricity to keep it chilled, the cost of insurance for the store, other overhead or fixed costs or operational costs. Generally speaking, the difference between gross and net are operating costs, many of which are fixed. That's consistent with GAAP, generally consistent with tax.

Again, depending on the analyst or accountant you asked, or the cost accountant, that becomes a different question.

I mentioned cannabis because under a quirk of the tax code, the only costs cannabis plant-touching entities can deduct are their direct or costs of goods sold. So there's a whole mini industry in packing as much as possible into that cost of goods sold number which otherwise would be considered operating costs.

Q And in this case, did you calculate gross profits for CLEAR or net profits for CLEAR?

A We calculated the gross profits as I describe. Now, the term, again, is -- the bottom of page 7, the Restatement refers to those as net profits, but the Restatement -- the Restatement's definition of net profits is consistent with gross profits or gross margin or incremental profits.

So the Restatement uses a different definition than what most of the rest of us would describe as being the definition of net profits. The restatement does not rely on GAAP or any other source.

Q Yeah. You refer to the restatement here, and then you say "and other authorities." Do you know what other authorities you're relying on here?

A Yeah. There's a variety of texts or treatises or sources, including some that I have published, that describe gross margins or incremental profits as a measure of enrichment, lost profits, unjust enrichment, things like that.

Q Are those other authorities that you relied on for that proposition listed in your Appendix A?

A Yes, sir, they are.

Q Where would that be?

A I'll start with page 13, about halfway down -- 60 percent of the way down is the Barrett and Herwitz text, which discuss the concept of -- this is page 13 of Appendix A. The Barrett text. As I recall, the Master Lease v. Idanta Partners case makes reference to that.

Q Wait. Sorry. Let's slow down a little bit.

This Barrett text, what does the Barrett text say for which you rely upon for this opinion?

A Well, the Barrett text talks about accounting, including cost accounting, and a definition of gross profits or gross margin, things like that, among other places -- among other topics.

Q Does it say that the proper measure for unjust enrichment is gross profit not net profit?

A I don't believe it says that. I understood your question to be other authoritative sources that address that question.

Q Well, let's be more specific with our language, then, rather than saying "that question."

I'm referring to a sentence in your report that says: "The measure of profitability called 'net profit' by the Restatement and other authorities is what the" -- "what an accountant or financial analyst would most likely call gross margin, gross profit, et cetera."

And so my question is, what authorities are you relying on that say that for these purposes, which is the calculation of unjust enrichment, that net profit is the same -- that when they say "net profit," they actually mean "gross profit"?

MS. ZEMAN: Objection to form.

A Let me see if I can help you there.

To answer your question, I'll take you back to page 3, Footnote 4 of my report, where I identify the Restatement and the Master Lease case and others as the source -- or what I understand to be the definition of net profits here.

What the Restatement calls net profits is what other sources or authors or cases would refer to as gross profit or gross margin. The sources I was citing in the appendix when you interrupted were those that define or explain gross profit or gross margin consistent with what the Restatement calls net profits.

Q (By Mr. Schottlaender) I'm afraid I'm just not understanding. So these -- let's -- these cases and the restatement that you've listed at Footnote 4, page 3 of your report, so that would be American Master Lease, Uzyel, and Restatement (Third) of Restitution, those sources stand for what proposition?

A That -- what the Restatement calls net profit is what the rest of the financial world and some of the legal world define as gross profit or gross margin.

Q And so on page 19 of your report, you end with this final conclusion saying: "Using the publically available data and information that Thomson Reuters has produced so far in discovery, Thomson Reuters' net profits attributable to CLEAR's use of class member's data can be calculated as approximately [redacted] million."

Do you see that?

A Yes, sir, I do.

Q When you say "net profits" there in that sentence, are those net profits as an accountant would use that term?

A No, sir. That is net profits as defined by the Restatement and those other cases. As I go into some detail in the report explaining what the Restatement defines as net profit, I interpret or understand to be gross margin or gross profit, so the net profit I'm referring to here is what an accountant or an analyst would call gross profit or gross margin.

Q So any time you have used the term "net profit" in this report, that is actually what an accountant would consider gross margin; correct?

A No, sir --

MS. ZEMAN: Objection.

A -- that is not correct.

Q (By Mr. Schottlaender) You just said that when you said the term profits on page 19 for your conclusion, that is what an accountant would refer to as gross profits; right?

A That is not what I said.

Q Okay. Then try again because I'm not getting it.

A If you can ask the question --

mean was the correct one, but yeah, I had some heart palpitations there.

There is no weighing of one of these figures over the other, it's just the simple average between them; correct?

A That is how the math works. We gave equal weighting to both numbers.

Q Are there any other numbers that you believe should have been incorporated into this calculation for California-allocated revenues?

A I didn't start out by phrasing it as "should have." I started out by attempting to measure the economic component of the CLEAR product using economic indices or proxies and the legal side of the CLEAR product, and so we surveyed a wide variety of data or attempted to find a wide variety of data we thought could speak to the legal usage or the legal component of this data.

Again, as it relates to California natural persons, we couldn't find anything that we thought to be more reliable than arrest records. To my knowledge, you can't arrest a corporation or a nonnatural person. The GDP number we felt very confident in. But we started out, cast the net wide and said, "What will tell us about the economic features of this data or the economic features of the data on California natural persons and what index or measure will tell us about the legal aspects of California natural persons?"

Q Is CLEAR used more for law enforcement investigations or for economic activity?

A I don't know, but those two could overlap. Those two could be the same thing on some occasions.

Q Was that a relevant consideration for your methodology?

A We contemplated it. But again, given the overlap, we didn't attempt to parse it that finally.

Q So for instance, because a California law enforcement agency might investigate financial fraud, then that overlap is a reason for you to not determine which CLEAR usage is more prominent?

A I think what you said is fair. Again, there might not be a difference between those two usages in some cases. But as we read how CLEAR was represented -- and again, it could just be an arrest record or an arrest issue, but where data on somebody's criminal history speaks to fraud or some other economic activity, those two become one.

Q Do you believe that an arrest rate is a proxy for CLEAR usage by law enforcement?

A I believe it's a proxy within this existing framework. As of now, to give us an idea of the legal aspect of the data used on Californians, again, I've cited to a couple of cases, or a couple of quotes in my report about the use of CLEAR data in investigations, fraud, know your customer, anti-money laundering, things like that.

Q I got lost in that answer. What is your correlation between arrest rates and CLEAR use by law enforcement?

A I don't know that we ever said there was. We're attempting to estimate the apportionment, or the share of California data that goes into the total U.S. dataset aggregated by Thomson Reuters in the CLEAR product.

Q The way that you started that answer was "I don't know that there was." And so what I'm interpreting from that is you don't know that there is a correlation between arrest rates and CLEAR use by law enforcement?

MS. ZEMAN: Objection to form.

A I don't know that there is or not. It's not a question we attempted to answer. We use the arrest rates as a proxy for the legal component of the CLEAR product.

Q (By Mr. Schottlaender) Is it possible that CLEAR -- CLEAR's use as a product itself affects arrest rates?

A That's an interesting question. I don't know. It could. But that's not something I looked into or was asked to.

Q Okay. So to summarize the last 5 minutes, you did not look into the correlation between arrest rates and CLEAR use by law enforcement, and you did not consider or look into whether the use of CLEAR by law enforcement itself impacts arrest rates; correct?

A I don't know that that data exists. I did not look at or look for it. I don't know that it even exists.

Q So the answer is correct?

A I'll stand by the answer I gave you.

Q I don't want the answer you gave me. I want you to answer my question. My question is: Is it a correct summary to say that you did not look into -- do not opine on the correlation between CLEAR usage and arrest rates or nor did you look into whether CLEAR's usage by law enforcement itself might impact those arrest rates; is that correct?

MS. ZEMAN: Objection. Form.

A No.

Q (By Mr. Schottlaender) What is not correct?

A The correct response is what I gave you previously.

Q That's not good enough. I want you to tell me again what is not correct about my answer -- or my question.

MS. ZEMAN: Objection. Form.

A Your question, at least at the tail end, was whether or not I looked into the existence of a correlation between arrests and inquiries on arrest rate records to which I said I do not even know if such a correlation exists, so whether or not it exists is fundamental or foundational to my attempting to evaluate that.

Q (By Mr. Schottlaender) My question is: Did you evaluate that? And you're saying I don't know if it exists. So obviously you don't know if it exists because you never went to go look for it. That's what I'm asking.

So you never went to go look at whether there's an impact on arrest rates from the usage of clear to begin with; right?

MS. ZEMAN: Objection.

A I did not look at that. I do not know if such data or correlation exists.

Q (By Mr. Schottlaender) You might know if you had gone to look for it.

MS. ZEMAN: Objection to form.

Q (By Mr. Schottlaender) Wouldn't both economic and -- sorry. Wouldn't both economic activity and arrest rate be correlated to the number of Californians in a state -- in the state at any anything about pinning?

A The premise to your question is erroneous. My lawyers never looked at this stuff.

Q I'm sorry. The plaintiff's lawyer referred to this concept in that deposition as pinning. Does pinning ring a bell?

A Yes, sir, it does.

Q Okay. So let's say that Thomson Reuters engages in pinning data to subjects so that the data can be queried later on.

Do you understand that premise?

A I believe I do, yes, sir.

Q Are any of Thomson Reuters' revenues attributable to actions like that, pinning the data or making it "queriable"?

A An interesting question. I don't know that I'm more qualified than anyone else to speak to that.

Q You're a damages expert in this case; right?

A I've been designated as such.

Q And your damages opinion has to do with the disgorgement of profits for the CLEAR product; right?

A The disgorgement -- the potential

disgorgement of net profits as defined.
Q Which relies on a calculation of allocated revenues; right?
A And marginal costs.
Q Okay. So you do not have an opinion about whether or not search activities undertaken by Thomson Reuters such as pinning at all affect revenues?
MS. ZEMAN: Objection.
A It's not a question I was asked to address. My treatment of costs and value are contained in my report. I focused my analysis on incremental or marginal costs related to the access and use of data on California natural persons during the damage period.
Q (By Mr. Schottlaender) And I'm not talking about costs. I'm strictly revenue side right now. And I'm wondering: Does your methodology account for allocating any portion of Thomson Reuters' CLEAR revenues to Thomson Reuters' activity such as pinning, sorting, making queriable, brand, any other components like that?
A Yes.

Q How so?

A We captured the total revenue attributable to CLEAR as reported to us by Thomson Reuters. Their generation of that revenue relies on all the factors you identified plus possibly others, but our use of revenue reflects all of those activities, all of that data.

Q Okay. But we just went through this line of questioning where you agreed that if you performed your methodology for every state and territory, you would be capturing 99 percent of total worldwide CLEAR revenues.

And so I'm asking: How does your methodology account for an allocation to Thomson Reuters' secret sauce of its product?

MS. ZEMAN: Objection to form.

A Two problems with that question. First of all, you misstated my prior testimony. I said based on a limited hypothetical that you identified, conceptually all of the allocation, if I disaggregate all of the revenue and add it back up, it should equal the total. Some of the parts should equal the whole, based on your limited hypothetical.

Secondly, I was never asked to address the drivers of revenue or the attributes of revenue across data or other activities or things like that. I focused on the gross revenue generated by the CLEAR product as attributed to California natural persons and subtracted out the marginal costs to come to my conclusion. I was not asked nor did I independently undertake to disaggregate the components or the attributes or drivers of revenue.

Q (By Mr. Schottlaender) Do you have an opinion on whether the data made available through CLEAR constitutes the entire value of CLEAR as a product?

A That's not an opinion I was asked to undertake or a question I was asked to answer.

Q So the value of CLEAR as a product and what constitutes the value of CLEAR as a product is not accounted for in your methodology. Is that fair to say?

MS. ZEMAN: Objection.

A No, that's not fair to say.

Q (By Mr. Schottlaender) Because revenues account for that valuation, is that what you were going to say?
MS. ZEMAN: Objection.
A Are you asking me to predict what I would have said?
Q (By Mr. Schottlaender) My question is, your method- -- is it your testimony that your methodology accounts for valuation of CLEAR as a product exclusively through the means -- the mechanism that you identified for calculating revenue?
A I'm sorry. Can I have that one again?
Q CLEAR as a product has data as a component of its value, the accessibility of data as a component of its value. Do you agree with that premise?
A I agree with that premise.
Q And CLEAR as a product has nondata attributes that contribute to its value as well. Do you agree with that premise?
MS. ZEMAN: Objection.
A I agree that it's possible.
Q (By Mr. Schottlaender) And just for the sake

of keeping this conversation flowing, some of those nondata attributes, by way of example, would be brand, the pinning, the queriability of the data, those sorts of things.

Are you with me so far? I'm not asking you to agree that those are -- that those do have value. I'm asking you to -- if you understand what I say nondata components of the value of CLEAR, that that is what I'm talking about.

So do you understand what I mean when I say nondata components for the value of CLEAR?

A Yes, sir, I believe I do.

MS. ZEMAN: We've been going for like an hour and 15, could we take just a 5-minute break to freshen up?

MR. SCHOTTLAENDER: In a little bit, yeah. Shortly.

MS. ZEMAN: I don't hear a question pending so I think now should be fine.

MR. SCHOTTLAENDER: I'm in the middle of my line --

MS. ZEMAN: Am I mistaken, is there a

attributable to a state is not correlated to GDP -- percentage of GDP that that jurisdiction represents in the country?

A I'm sorry. You lost me with that question.

Q Let's -- let's simplify your model as a hypothetical. Let's say you only took GDP -- percentage of GDP, and so we're at like 14.6 percent. And GDP can be broken up, of course, for each state plus D.C. And the final -- you know, of course, the GDP final percentage, you're at 100 percent GDP, that's the nation's GDP, that's where you derive your 14.6 percent from.

Are you with me so far?

A Yes, sir.

Q Okay. And again, assuming that what you had done here was allocated revenues just based on that GDP percentage, then if you did that for every other U.S. state and territory, then the result would be -- if you added all of those up, because you have a 100 percent of GDP, you would have allocated 100 percent of CLEAR revenues; right?

A If that's the methodology I used. If I had

100 percent of the U.S. revenues broken out by state and I multiply those percentages by CLEAR domestic revenues, then I added up that resulting calculation, that would total CLEAR's total revenue. The total revenue by state would equal the total domestic revenue. That's basic math.

Q And where we left off before the break is that CLEAR has some nondata value components in its valuation, yes? Do you remember that conversation?

A I remember that conversation.

Q Under that methodology we just described, the simplified one where we're just using the GDP percentage, if CLEAR's revenues were apportioned to each jurisdiction in that way so that now 100 percent of CLEAR gross revenue has been distributed, or allocated out, in that methodology, Thomson Reuters would have retained zero revenues that it might have derived from the nondata valuation -- nondata value components; right?

A No.

Q And the answer was no?

A The answer is no. You're comparing an apple to an orange grove.

Q How so?

A In the first case, in your simplified hypothetical, by allocating total revenues by state GDP, we still get 100 percent of domestic GDP broken out by state.

Your question related to the revenue driver or attribute, what your client calls its secret sauce, back against that data. Those are two different things.

One is to allocate revenue across the state by GDP, the other is an attempt to disaggregate revenue by its various components, the things you identified, data, brand, visualizations, things like that. Those are two different things.

Q Right. And your formula accounts for the former but not the latter. It analyzes revenues in the aggregate, it does not parse out what components of the product have value or do not have value?

A And I apologize if I wasn't clear the prior times you asked me this question, but the answer to your question is no, I did not disaggregate revenue by its various drivers or which databases may or may not have added more value or have more access or how important marketing was or how important the visualization feature was.

I did not attempt to break out revenue or revenue drivers by those components. I was not asked to do that, and it's not relevant to my calculation.

Q Let's move on to costs. You analyzed marginal costs in this case; is that right?

A Yes, sir, that is correct.

Q What are marginal costs generally speaking?

A Well, I could drag you through Section 3 starting on page 14. Or in the interest of time, I can try and summarize that.

As I mention there, marginal costs or incremental costs or variable costs or direct costs for my purposes here are the same thing, and that is the incremental or additional cost required to sell an additional unit.

There is a very good summarized definition of that. Page 14 starts the calculation, but the description of the concept actually starts back

A I believe the flat fee is more prevalent.

Q The subscription usage?

A That's my understanding.

Q Okay. So what is a marginal transaction in the subscription arrangement?

A I don't know that I ever looked at that question.

Q Well, you're calculating marginal revenue. And so one component of that is defining your marginal unit so that you can attribute the revenue in the first place. Where -- what is the unit? Is it a search?

A The premise to your question is incorrect. I didn't calculate marginal revenues. I calculated total revenues derived by CLEAR using data on California persons, and then calculated the marginal or incremental cost related to producing that revenue.

Q Right. Because you used an allocation method for revenue and you used an incremental cost basis on the cost side. So I guess I'll stick with cost.

For determining incremental cost, what was

REPORTER'S CERTIFICATE

STATE OF UTAH)
COUNTY OF SALT LAKE)

I, Heidi Hunter, RPR, CCR, for the state of Utah.

That the foregoing proceedings were taken before me at the time and place set forth in the caption hereof; that the witness was placed under oath to tell the truth, the whole truth, and nothing but the truth.

That I thereafter transcribed my said shorthand notes into typing and that the typewritten transcript of said deposition is a complete, true and accurate transcription of my said shorthand notes taken at said time.

I further certify that I am not a relative employee, attorney, or counsel of any of the parties nor am I a relative or employee of any of the parties' attorney or counsel connected with the action, nor am I financially interested in the action.

Heidi Hunter

Heidi Hunter, RPR, CCR

October 3, 2022

Re: ***Brooks v. Thomson Reuters Corporation*, Case No. 3:21-cv-01418-EMC**

USDC Northern District of California – San Francisco Division

Deposition Errata for the Deposition of Terry Lloyd (Deposition dated August 22, 2022, transcript received September 2, 2022)

To whom it may concern:

I, Terry Lloyd, have reviewed the transcript of my deposition in *Brooks et al. v. Thomson Reuters Corp.*, Case No. 3:21-cv-01418-EMC, taken on August 22, 2022. Attached hereto is a list of errata identified in the deposition transcript.

TERRY LLOYD

10/3/22

DATE

See Attached CA Notary Certificate

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personally appeared Terry Lloyd
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who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

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SIGNATURE PAGE

Case: Cat Brooks and Rasheed Shabazz, et al. v. Thomson Reuters Corp.

Witness Name: Terry Lloyd

Deposition Date: August 22, 2022

I do hereby acknowledge that I have read and examined the foregoing pages of the transcript of my deposition and that:

(Check appropriate box):

( ) The same is a true, correct and complete transcription of the answers given by me to the questions therein recorded.

(X) Except for the changes noted in the attached Errata Sheet, the same is a true, correct and complete transcription of the answers given by me to the questions therein recorded.

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personally appeared Terry Lloyd
Name(s) of Signer(s)

who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

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Notary Public - California
Contra Costa County
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Terry Lloyd Deposition Errata Sheet

Page:Line	Existing Testimony	Corrected Testimony
7:3	"plaintiff's counsel's fees"	"plaintiffs' counsel's fees"
7:22	"I have done damage calculations"	"I have done damages calculations"
10:20	"that has highing and notes on it"	"that has highlighting and notes on it"
12:1	"lawyers on the plaintiff's side"	"lawyers on the plaintiffs' side"
12:5	"plaintiff's side"	"plaintiffs' side"
14:10-11	"which cases you involved in"	"which cases you were involved in"
14:12	"a list in front of. Could"	"a list in front of you, could"
23:7	"couldn't say of certainty"	"couldn't say with certainty"
31:4	"The questions is"	"The question is"
32:11	"things like. I have"	"things like that. I have"
38:5	"individuals with target"	"individuals, with target"
38:18-20	"including plaintiff's complaint documents, documents produced in discovery, and the report of Professor Turow.'"	"including plaintiffs' complaint, documents produced in discovery, and the report of Professor Turow.'"
39:4	"with accurate and source data.'"	"with accurate and sourced data.'"
40:21	"use cases at CLEAR"	"use cases of CLEAR"
58:10	"restatement"	"Restatement"
58:11	"restatement"	"Restatement"
61:4	"restatement"	"Restatement"
64:14	"restatement"	"Restatement"
64:20	"restatement"	"Restatement"
67:8	"restatement"	"Restatement"
68:21	"Unjust enrichment"	"Unjust Enrichment"
59:2	"Schweize [phonetic]"	"Schweihs"
70:9	"Nancy Fannin [phonetic]"	"Nancy Fannon"
103:21	"adieu"	"ado"
104:8	"you're"	"your"
119:10	"I'll use will California-apportioned"	"I'll use California-apportioned"
123:15	"that finally"	"that finely"
127:11	"clear"	"CLEAR"
131:12	"shows that you 80 percent"	"shows you that 80 percent"
161:5	"of these Zeke pivot"	"of this Zeke pivot"
164:9	"domicile there or that all the usages were from there"	"domiciled there or that all the usages from there"
168:4	"plaintiff's lawyer"	"plaintiffs' lawyer"
174:5	"and alls I'm"	"and all I'm"
195:8	"CLEAR"	"clear"
228:17	"CLEAR deliveries some"	"CLEAR delivers some"
230:9	"digital product"	"digital products"

239:3	"Is what is a 'skip customer'"	"And what is a 'skip customer'"
265:2	"That sentence speak for himself."	"That sentence speaks for itself."
265:22	"unjust enrichments"	"unjust enrichment"
274:14	"CLEAR's customer's preferences"	"CLEAR's customers' preferences"