

Eric H. Gibbs (SBN 178658)
Andre M. Mura (SBN 298541)
Amy M. Zeman (SBN 273100)
Mark H. Troutman (*pro hac vice*)
Ezekiel S. Wald (SBN 341490)
Hanne Jensen (SBN 336045)
GIBBS LAW GROUP LLP
1111 Broadway, Suite 2100
Oakland, CA 94607
Telephone: (510) 350-9700
Facsimile: (510) 350-9701
ehg@classlawgroup.com
amm@classlawgroup.com
amz@classlawgroup.com
mht@classlawgroup.com
zsw@classlawgroup.com
hj@classlawgroup.com

Geoffrey A. Graber (SBN 211547)
Karina G. Puttieva (SBN 317702)
**COHEN MILSTEIN SELLERS & TOLL
PLLC**
1100 New York Ave. NW, Fifth Floor
Washington, DC 20005
Telephone: (202) 408-4600
Facsimile: (202) 408-4699
ggraber@cohenmilstein.com
kputtieva@cohenmilstein.com

Attorneys for Plaintiffs and the Proposed Class

**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

**DECLARATION OF ANDRE M. MURA IN
SUPPORT OF PLAINTIFFS' OMNIBUS
MOTION TO EXCLUDE EXPERT
OPINIONS ON CLASS CERTIFICATION**

Date: April 20, 2023
Time: 1:30 p.m.
Place: Courtroom 5, 17th Floor
Judge: Hon. Edward M. Chen

I, Andre M. Mura, declare under penalty of perjury:

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 submit this declaration in support of Plaintiffs Cat Brooks' and Rasheed Shabazz's omnibus motion to exclude expert opinions on class certification. I base this declaration on my personal knowledge of the facts and, if called upon to do so, could and would testify competently to the facts contained in this declaration.

3. The below chart lists a description of each attached exhibit.

Exhibit Number	Bates Number
Ex. 1	Excerpted Deposition of Dr. Ran Kivetz, Ph.D.
Ex. 2	H. Jeff Smith, Tamara Dinev, Heng Xu, <i>Information Privacy Research: An Interdisciplinary Overview</i> , 35 MIS Quarterly 989 (Dec. 2011)
Ex. 3	Sandra C. Matz & Oded Netzer, <i>Using Big Data as a window into consumers' psychology</i> , Current Opinion in Behavioral Sciences 18:7-12 (2017)
Ex. 4	Excerpted Deposition of Professor Jane Bambauer
Ex. 5	The Federalist Society's Practice Group Podcast, <i>The Right to Be Forgotten</i> , The Federalist Society (Oct. 5, 2018 12:30p.m. EDT), available at https://fedsoc.org/events/the-right-to-be-forgotten .
Ex. 6	The Information Management 360 Podcast, <i>Episode 30: Discussing Privacy Regulation with the Uniform Law Commission</i> , Law360 (Sept. 7, 2022), available at https://www.archive360.com/podcast/discussing-privacy-regulation-with-the-uniform-law-commission .

4. Attached as **Exhibit 1** is a true and correct copy of portions of the deposition of Thomson Reuters' class certification rebuttal expert Ran Kivetz ("Kivetz Dep."), which was conducted on October 11, 2022.

5. Attached as **Exhibit 2** is a true and correct copy of an article written by H. Jeff Smith, Tamara Dinev, and Heng Xu, entitled "Information Privacy Research: An Interdisciplinary Overview," and published in 2011 in MIS Quarterly. This article was cited

1 in Ran Kivetz's rebuttal expert report propounded in this litigation. The copy attached here
2 was retrieved using the citation in that report from an online repository.

3 6. Attached as **Exhibit 3** is a true and correct copy of an article written by
4 Sandra C. Matz & Oded Netzer, entitled "Using Big Data as a window into consumers'
5 psychology," and published in 2017 in Current Opinion in Behavioral Sciences. This article
6 was cited in Ran Kivetz's rebuttal expert report propounded in this litigation. The copy
7 attached here was retrieved using the citation in that report from an online repository.

8 7. Attached as **Exhibit 4** is a true and correct copy of portions of the deposition
9 of Thomson Reuters' class certification rebuttal expert Jane Bambauer ("Bambauer Dep."),
10 which was conducted on October 6, 2022. Professor Bambauer's deposition transcript was
11 separated into two volumes because the assigned Court Reporter for the deposition was
12 unable to provide real-time reporting, and a new Court Reporter was assigned in order for
13 real-time reporting to be available to the attorneys. Each reporter prepared and certified the
14 portion of the deposition they covered. Plaintiffs cite only from Volume II, which is
15 excerpted here.

16 8. Attached as **Exhibit 5** is a true and correct copy of a transcript of The
17 Federalist Society's panel titled "The Right to Be Forgotten." Professor Bambauer appeared
18 as a panelist and confirmed at her deposition that she recalled partaking in the discussion,
19 and had no reason to believe that the transcript was inaccurate. Bambauer Dep. at 138:2-
20 140:2.

21 9. Attached as **Exhibit 6** is a true and correct copy of a transcript of Episode 30
22 of Law360.com's Information Management 360 podcast. Professor Bambauer appeared as a
23 guest on the podcast and confirmed at her deposition that she recalled partaking in the
24 discussion, and had no reason to believe that the transcript was inaccurate. Bambauer Dep.
25 at 120:18-121:25.

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1 I declare that the foregoing is true and correct. Executed on February 6, 2023, in
2 Oakland, California.

3 /s/ Andre M. Mura

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