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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

**NOTICE OF MOTION FOR LEAVE TO
FILE PROPOSED AMICI CURIAE BRIEF
OF THE SOFTWARE & INFORMATION
INDUSTRY ASSOCIATION AND THE
COALITION FOR SENSIBLE PUBLIC
RECORDS ACCESS IN SUPPORT OF
DEFENDANT**

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

TO THE PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on April 20, 2023 at 1:30 p.m., or as soon thereafter as the
matter may be heard in Courtroom 5 of the United States District Court, Northern District of
California, San Francisco Division, The Software & Information Industry Association (“SIIA”)

1 and Coalition for Sensible Public Records Access (“CSPRA”) will move this Court for leave to
 2 file their proposed Amici Curiae Brief in support of Defendant Thomson Reuters Corporation’s
 3 Opposition to Plaintiffs’ Motion for Class Certification. Proposed Amici’s motion is based on this
 4 notice, the Motion for Leave to File Amici Curiae Brief in Support of Defendant and Proposed
 5 Amici Curiae Brief filed on February 2, 2023 [ECF No. 156], and all documents on file in this
 6 matter. Defendant consents to the filing of proposed Amici’s brief. Plaintiffs indicate they will
 7 oppose. ECF No. 160.

8 Please note also that although Amici are prepared to argue this matter on the date noticed,
 9 they have no objection should the Court choose to decide this matter on the papers.

10 **STATEMENT OF INTEREST**

11 1. The SIIA is a trade association for those in the business of information that represents
 12 approximately 600 member companies, among them publishers of software and information
 13 products, including databases, enterprise and consumer software, and other products that combine
 14 information with digital technology.

15 2. SIIA member companies serve nearly every segment of society, including business,
 16 education, government, healthcare, and consumers. SIIA is dedicated to creating a healthy
 17 environment for the creation, dissemination, and productive use of information.

18 3. SIIA has an interest in this matter and qualifications to assist this Court as it considers
 19 Plaintiffs’ motion because the availability of accurate public records is central to SIIA’s mission
 20 and many of its members rely on access to public records. Moreover, Plaintiffs’ challenge to the
 21 Defendant’s business model has implications for other SIIA members and their businesses.

22 4. CSPRA is a non-profit organization dedicated to promoting the principle of open public
 23 record access to ensure individuals, the press, advocates, and businesses the continued freedom to
 24 collect and use the information made available in the public record for personal, governmental,
 25 commercial, and societal benefit.

26 5. Members of CSPRA are among the many entities that comprise a vital link in the flow
 27 of information for these purposes and provide services that are widely used by constituents in
 28

every state. Collectively, CSPRA members alone employ over 75,000 persons across the U.S. The economic and societal activity that relies on entities such as CSPRA members is valued in the trillions of dollars and employs millions of people.

6. CSPRA has an interest in this matter and qualifications to assist this Court as it considers Plaintiffs' motion because the availability of complete and accurate public records is central to CSPRA's belief that the economy and society depend on value-added information and services that include public record data for many important aspects of our daily lives, and to CSPRA's work to protect those sensible uses of public records.

7. SIIA and CSPRA wish to be heard on this issue because consumers, law enforcement, and a wide range of businesses rely on data that flows in and through Defendant's CLEAR product, and other similar products, to function and fulfill their every-day obligations. The brief submitted by SIIA and CSPRA will assist this Court in its understanding of the CLEAR product and the ways in which open access to public records benefits virtually every facet of society.

8. SIIA and CSPRA have read the parties' briefs, and their proposed Amici brief is necessary to fully and adequately address the issue of class certification.

Accordingly, SIIA and CSPRA request that they be granted permission to file their proposed Amici brief. ECF No. 156.

Dated: February 13, 2023

Respectfully submitted,

/s/ Laura Sullivan

Laura Sullivan

*Attorney for Proposed Amici Curiae
The Software & Information Industry Association
and The Coalition for Sensible Public Records
Access*