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**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-01418-EMC-KAW

**DECLARATION OF ANDRE M. MURA IN
SUPPORT OF PLAINTIFFS' OPPOSITION
TO DEFENDANT'S MOTION TO
EXCLUDE TESTIMONY OF FINANCE
SCHOLAR'S GROUP, INC. (TERRY LLOYD)**

Date: April 20, 2023

Time: 1:30 p.m.

Place: Courtroom 5, 17th Floor

Judge: Hon. Edward M. Chen

DECLARATION OF ANDRE M. MURA IN SUPPORT OF PLAINTIFFS' OPPOSITION TO
DEFENDANT'S MOTION TO EXCLUDE TESTIMONY OF TERRY LLOYD

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

1 I, Andre M. Mura, declare the following:

2 1. I am a member in good standing of the Bar of California and the bar of this Court. I am
3 a partner at Gibbs Law Group LLP in Oakland, California, and represent Plaintiffs in this matter.

4 2. I submit this declaration in support of Plaintiffs' Opposition to Defendant Thomson
5 Reuters' Motion to Exclude Testimony of Finance Scholar's Group, Inc. (Terry Lloyd). I base this
6 declaration on my personal knowledge of the facts and, if called upon to do so, could and would testify
7 competently to the facts contained in this declaration.

8 3. Attached as **Exhibit 1** is a true and correct copy of portions of the transcript of the
9 deposition of Douglas Kidder, taken on September 28, 2022.

10 4. Attached as **Exhibit 2** is a true and correct copy of Defendant Thomson Reuters'
11 Fourth Supplemental Answers and Objections to Plaintiffs' First Set of Interrogatories to Defendant,
12 served on January 24, 2023.

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14 /s/ Andre M. Mura
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