

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-01418-EMC-KAW

**DECLARATION OF ANDRE M. MURA
SUPPORTING PLAINTIFFS' REPLY IN
SUPPORT OF PLAINTIFFS' MOTION FOR
CLASS CERTIFICATION**

Date: April 20, 2023

Time: 1:30 p.m.

Place: Courtroom 5, 17th Floor

Judge: Hon. Edward M. Chen

1 I, Andre M. Mura, declare:

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 supporting Plaintiffs Cat Brooks' and Rasheed Shabazz's reply
5 in support of Plaintiffs' motion for class certification. I base this declaration on my personal knowledge
6 of the facts as well as my review of my firm's case file and, if called upon to do so, could and would
7 testify competently to the facts contained in this declaration.

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

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Exhibit Number	Description
Ex. 1	Excerpt of Deposition of Eric Gerhard

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11 4. Attached as **Exhibit 1** is a true and correct copy of portions of the deposition of
12 Thomson Reuters employee Eric Gerhard ("Gerhard Dep.") which was conducted on February 22,
13 2023.

14 I declare that the foregoing is true and correct. Executed on March 9, 2022, in Oakland,
15 California.

16 /s/ Andre M. Mura

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