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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

JOINT SEALING REQUEST AND [PROPOSED] ORDER RE COURT ORDER DATED MAY 16, 2023 (ECF NO. 206)

JOINT SEALING REQUEST AND [PROPOSED] ORDER

The Parties submit this joint sealing request and proposed order pursuant to the Court's Order dated May 16, 2023 (ECF No. 206). Good cause and compelling reasons exist to seal the following portions of the Court's Order dated May 16, 2023, because they reveal financial information related to the CLEAR platform, confidential information about the proportion of CLEAR searches run using various fields, and confidential information about the makeup of CLEAR customers and CLEAR data that is not already public. Revealing this information publicly would harm Thomson Reuters by allowing competitors to learn how Thomson Reuters has positioned CLEAR in the marketplace and could give rise to a misleading or inaccurate picture of CLEAR and related business practices. The Court has already sealed this information in prior filings. *See* Dkts. 179, 188. Plaintiffs do not oppose sealing of these materials.

ECF No. 206	Portion(s) to Seal
Order (3:5)	Page 3, line 5 (after "calculated as approximately" and before million.")
Order (3:9)	Page 3, line 9 (after "Dr. Lloyd determines that" and before "of Reuters' revenue from CLEAR is from recurring")
Order (3:11)	Page 3, line 11 (after "searches) and" and before "is from transactional revenue (per-search charges) from the years between 2017")
Order (3:16)	Page 3, line 16 (after "determined that the" and before "was made in 2017,")
Order (3:16)	Page 3, line 16 (after "was made in 2017,"and before "in 2018,")
Order (3:16)	Page 3, line 16 (after "in 2018," and before "in 2019,")
Order (3:16)	Page 3, line 16 (after "in 2019," to end of line 16)
Order (3:17)	Page 3, line 17 (after "in 2020, and" and before "in 2021.")
Order (3:26)	Page 3, line 26 (after "about natural persons in the CLEAR database, he determined that" and before "of that California revenue")
Order (4:4.5)	Page 4, line 4.5 (after "the data indicates that approximately" and before "of all CLEAR searches")

ECF No. 206	Portion(s) to Seal
Order (4:11)	Page 4, line 11 (after "Californians' personal information was" and before "resulting in a")
Order (4:11)	Page 4, line 11 (after "resulting in a" and before "profit margin.")
Order (7:1)	Page 7, line 1 (after "and" and before "natural person proportions that he used in his calculation of revenue.")
Order (7:22)	Page 7, line 22 (after "Based on the fact that "about" and before "of")
Order (7:23)	Page 7, line 23 (after "CLEAR's current customers are corporate users" and the other" and before "are governmental entities,")
Order (7:26)	Page 7, line 26 (after "average these metrics based on the data that about" and before "the customers are governmental entities")
Order (7:27)	Page 7, line 27 (after "and" and before "are corporate users.")
Order (8:1)	Page 8, line 1 (beginning of line 1 and before "were for California.")

DATED: May 23, 2023

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ATTESTATION

Pursuant to Civil Local Rule 5-1(i), I attest that concurrence in the filing of this document has been obtained from the other signatory.

/s/ Anna Mouw Thompson
Anna Mouw Thompson

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: _____

_____
Hon. Edward M. Chen
United States District Judge