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[Additional counsel on signature page]

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

STIPULATION TO AMEND CASE SCHEDULE AND [PROPOSED] ORDER

Judge: Hon. Edward M. Chen

Pursuant to Civil Local Rules 6-1 and 7-12, the parties hereby stipulate as follows:

Whereas, the operative case schedule, ECF No. 84, requires the parties to meet and confer within 14 days of a ruling on the motion for class certification to set deadlines for trial expert disclosures and discovery, pre-trial deadlines, and a trial date;

Whereas, the Court granted Plaintiffs' Motion for Class Certification on July 31, 2023, ECF No. 213 (filed under seal, and publicly filed at ECF No. 222 on August 10, 2023);

Whereas, the parties met and conferred on August 14, August 31, and September 15, 2023, regarding the remaining case deadlines; and

Whereas, the parties have prepared the following table summarizing the agreed-upon proposed changes to the case schedule:

Current schedule	Event	Proposed Amended Schedule
September 19, 2023	Status Conference	No change proposed.
The parties shall meet and confer within 14 days of a ruling on the motion for class certification to set deadlines for trial expert disclosures and discovery, pre-trial deadlines, and a trial date.	Opening Trial Expert Reports	February 16, 2024
Defer setting this deadline until after a ruling on class certification.	Rebuttal Trial Expert Reports	June 14, 2024
N/A	Reply Trial Expert Reports	August 5, 2024
Defer setting this deadline until after a	Close of Expert Discovery	September 16, 2024

ruling on class certification.		
Defer setting this deadline until after a ruling on class certification.	Dispositive and Daubert Motion / Motion to Strike Deadline	November 6, 2024
N/A	Deadline for Opposition to Dispositive and Daubert Motion(s) / Motion(s) to Strike	December 13, 2024
N/A	Deadline for Replies in Support of Dispositive and Daubert Motion(s) / Motion(s) to Strike	January 22, 2025
N/A	Hearing on Dispositive and Daubert Motion(s) / Motion(s) to Strike	February 13, 2025 (or another date selected by the Court)
Defer setting this deadline until after a ruling on class certification.	Pretrial conference	August 12, 2025
Defer setting this deadline until after a ruling on class certification.	Trial	October 14, 2025

IT IS HEREBY STIPULATED AND AGREED, subject to Court approval, that the case schedule shall be extended as reflected in the table above.

DATED: September 15, 2023

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Respectfully submitted,

/s/ *Andre M. Mura*

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DATED: September 15, 2023

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[PROPOSED] ORDER

PURSUANT TO STIPULATION AND FOR GOOD CAUSE, IT IS SO ORDERED.

DATED:

_____

EDWARD M. CHEN
United States District Judge

ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from the other signatory.

/s/ Andre M. Mura