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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 JULY 31, 2023 (ECF NO. 213)**

JOINT SEALING REQUEST AND [PROPOSED] ORDER

The Parties submit this joint sealing request and proposed order pursuant to the Court's Order dated July 31, 2023 (ECF No. 213). Good cause and compelling reasons exist to seal the following portions of the Court's Order dated July 31, 2023, because they reveal financial information related to the CLEAR platform and confidential information about 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. 147, 178. Plaintiffs do not oppose sealing of these materials.

ECF No. 213	Portion(s) to Seal
Order (3:27)	Page 3, line 27 (after "Reuters has made" and before "in revenue from")
Order (3:28)	Page 3, line 28 (after "Clear since 2017, with" and before "for 2021 alone.")
Order (4:2)	Page 4, line 2 (after "made" and before "in net profit since 2017")
Order (4:2)	Page 4, line 2 (after "with" and before "for 2021 alone")
Order (6:7)	Page 6, line 7 (after "Brooks:" and before "(which also generated a CLEAR report)")
Order (6:7)	Page 6, line 7 (after "(which also generated a CLEAR report)," through the end of line 7)
Order (6:8)	Page 6, line 8 (after "and" and before "(for a social security number not matching Ms. Brooks)")
Order (6:10)	Page 6, line 10 (after "name:" and before "Docket No. 152-5")
Order (12:3)	Page 12, line 3 (after "Ms. Brooks:" and before "(which also generated a CLEAR)")
Order (12:4)	Page 12, line 4 (after "report)," and before "and")
Order (12:4)	Page 12, line 4 (after "and" and before "(for a social security number not)")

ECF No. 213	Portion(s) to Seal
Order (12:6-7)	Page 12, lines 6-7 (after “Mr. Shabazz’s current name:” and before “Docket No. 152-5 Exhibit B-5”)
Order (15:19)	Page 15, line 19 (after “with respect to each individual for” and before “of Californians.”)
Order (16:9)	Page 16, line 9 (beginning of line 16 and before “of 37,253,956 individuals in California”)
Order (16:9)	Page 16, line 9 (after “of 37,253,956 individuals in California” and before “MCC at 11”)
Order (22:1)	Page 22, line 1 (after “not ascertainable through CLEAR’s records of” through the end of line 1)
Order (31:4)	Page 31, line 4 (after “covers” and before “of 37,253,956 individuals in California”)
Order (31:4)	Page 31, line 4 (after “of 37,253,956 individuals in California” and before “). Compared to forty million”)

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2 DATED: August 4, 2023

PERKINS COIE LLP

3 By: /s/ Anna Mouw Thompson
4 Anna Mouw Thompson, *pro hac vice*
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5 *Attorneys for Defendant*
6 *Thomson Reuters Corporation*

7 DATED: August 4, 2023

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23 **ATTESTATION**

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

26 /s/ Anna Mouw Thompson
27 Anna Mouw Thompson

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: _____

Hon. Edward M. Chen
United States District Judge