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Attorneys for Plaintiffs and the 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-1418-EMC-KAW

**NOTICE OF SETTLEMENT IN
PRINCIPLE AND JOINT REQUEST
TO VACATE DEADLINES AND SET
FURTHER DEADLINES FOR
PROPOSED CLASS ACTION
SETTLEMENT APPROVAL**

Judge: Hon. Edward M. Chen

Pursuant to Civil Local Rules 6-2, 7-12, and 16-2(d), the parties—a certified class of California plaintiffs represented by class representatives Cat Brooks and Rasheed Shabazz and class counsel Gibbs Law Group LLP and Cohen Milstein Sellers Toll LLP, and Defendant Thomson Reuters, represented by Perkins Coie LLP—have reached an agreement in principle under the supervision of U.S. District Court Judge Layn Phillips (ret.) for the complete resolution of this certified class action. (Thomson Reuters Enterprise Centre GmbH is also a party to this agreement.)

Having reached an agreement in principle, the parties will next finalize a written settlement agreement, and Plaintiffs will prepare a motion for preliminary approval. To facilitate these next steps, the parties jointly request that the Court’s order dated October 26, 2023 (Doc. 227) and all associated deadlines be vacated, that the current trial setting for this action be vacated, and that the Court set a deadline for the filing of a motion for preliminary approval by August 15, 2024.

IT IS HEREBY JOINTLY REQUESTED THAT THE Court vacate all pending deadlines for this action and order that a motion for preliminary approval be filed by August 15, 2024.

Dated: May 17, 2024

Respectfully submitted,

/s/ Andre M. Mura

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20 DATED: May 17, 2024

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Attorneys for Defendant
Thomson Reuters Corporation

[PROPOSED] ORDER

Upon consideration of the Parties' Notice of Settlement in Principle and Joint Request to Vacate Deadlines and Set Further Deadlines for Proposed Class Action Settlement Approval, it is hereby ORDERED that all pending deadlines in this action are VACATED, and a motion for preliminary approval will be due by August 15, 2024.
PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: _____

The Hon. 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