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**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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*Thomson Reuters Corporation*

~~[PROPOSED]~~ ORDER **AS MODIFIED**

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~~ <sup>Some</sup> 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: June 13, 2024

  
The Hon. Edward M. Chen  
United States District Judge