

Andre M. Mura (SBN 298541)
Ezekiel S. Wald (SBN 341490)
GIBBS LAW GROUP LLP
1111 Broadway, Suite 2100
Oakland, CA 94607
Telephone: (510) 350-9700
Facsimile: (510) 350-9701
amm@classlawgroup.com
zsw@classlawgroup.com

Geoffrey A. Graber (SBN 211547)
Karina G. Puttieva (SBN 317702)
**COHEN MILSTEIN SELLERS & TOLL
PLLC**
1100 New York Ave. NW, Fifth Floor
Washington, DC 20005
Telephone: (202) 408-4600
Facsimile: (202) 408-4699
ggraber@cohenmilstein.com
kputtieva@cohenmilstein.com

Attorneys for Plaintiffs and the Certified 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-01418-EMC-KAW

**STIPULATION AND [PROPOSED]
ORDER TO EXCEED PAGE LIMIT
FOR MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT AND EXTEND TIME
TO FILE**

Judge: Hon. Edward M. Chen

1 Pursuant to Civil Local Rules 6-2, 7-4(b), 7-11, and 7-12, the parties hereby stipulate as
2 follows:

3 Whereas, pursuant to stipulation of the parties, the Court ordered that Plaintiffs' motion
4 for preliminary approval of a proposed class action settlement be due by August 15, 2024, ECF
5 No. 234;

6 Whereas, the parties have agreed to a term sheet and have made substantial progress on
7 finalizing a long form settlement agreement, but require a short extension of time to finalize the
8 long form settlement agreement and to allow Plaintiffs to finalize their motion for preliminary
9 approval; and

10 Whereas, a twelve-day extension of time to file Plaintiffs' motion for preliminary
11 approval will assist the parties in finalizing both the long form settlement agreement and the
12 motion for preliminary approval and associated declarations;

13 Whereas, local rule 7-2(b) states that no motion may exceed 25 pages in length and Local
14 Rule 7-11 permits the parties to request exceeding "otherwise applicable page limitations";

15 Whereas, at this time Defendant does not intend to submit a separate brief explaining its
16 support for the proposed settlement;

17 Whereas, Plaintiffs are having difficulty presenting all information helpful for the Court
18 to evaluate the proposed settlement under Rule 23(e)(2) and the Northern District's Procedural
19 Guidance for Class Action Settlements within the page constraints provided by the Local Rules;

20 Whereas, Defendants do not object to an extension of the page limit for Plaintiffs'
21 memorandum of points and authorities in support of the preliminary approval motion, up to
22 and including 50 pages, and the parties agree that such an extension is appropriate; and

23 Whereas, the total number of pages requested here is less than the cumulative total
24 number of pages that the Local Rules would allow if the parties submitted separate briefing;

25 **IT IS HEREBY STIPULATED AND AGREED**, subject to the Court's approval, that (1)
26 the portion of the Court's Order at ECF No. 234 that requires Plaintiffs to file their motion for
27 preliminary approval by August 15, 2024 is vacated as to only that deadline, and a motion for
28 preliminary approval will be due on or before August 27, 2024; and (2) Plaintiffs may file a

memorandum of points and authorities in support of their motion for preliminary approval of no more than 50 pages.

DATED: August 8, 2024

GIBBS LAW GROUP LLP

Respectfully submitted,

/s/ Andre M. Mura

Andre M. Mura (SBN 298541)

Ezekiel S. Wald (SBN 341490)

GIBBS LAW GROUP LLP

1111 Broadway, Suite 2100

Oakland, California 94607

(510) 350-9700

ehg@classlawgroup.com

amm@classlawgroup.com

zsw@classlawgroup.com

hj@classlawgroup.com

Geoffrey A. Graber (SBN 211547)

Karina G. Puttieva (SBN 317702)

COHEN MILSTEIN SELLERS & TOLL PLLC

1100 New York Ave. NW, Fifth Floor

Washington, DC 20005

Telephone: (202) 408-4600

Facsimile: (202) 408-4699

ggraber@cohenmilstein.com

kputtieva@cohenmilstein.com

Attorneys for Plaintiffs and the Certified Class

1 DATED: August 8, 2024

PERKINS COIE LLP

2
3 By: /s/ Susan D. Fahringer

4 Susan D. Fahringer (SBN 21567)
5 Nicola C. Menaldo (*pro hac vice*)
6 Anna M. Thompson (*pro hac vice*)
7 1201 Third Avenue, Suite 4900
8 Seattle, WA 98101-3099
9 Telephone: (206) 359-8000
10 Facsimile: (206) 359-9000
11 SFahringer@perkinscoie.com
12 NMenaldo@perkinscoie.com
13 AnnaThompson@perkinscoie.com

14 Hayden M. Schottlaender (*pro hac vice*)
15 **PERKINS COIE LLP**
16 500 N. Akard Street, Suite 3300
17 Dallas, Texas 75201-3347
18 Telephone: (214) 965-7700
19 Facsimile: (214) 965-7799
20 HSchottlaender@perkinscoie.com

21 Gabriella Gallego (SBN 324226)
22 **PERKINS COIE LLP**
23 3150 Porter Drive
24 Palo Alto, CA 94304-1212
25 Telephone: (650) 838-4300
26 Facsimile: (650) 838-4350
27 GGallego@perkinscoie.com

28 *Attorneys for Defendant*
Thomson Reuters Corporation

[PROPOSED] ORDER

PURSUANT TO STIPULATION, (1) the deadline to file the motion for preliminary approval is extended to August 27, 2024; and (2) Plaintiffs may file a memorandum of points and authorities in support of their motion for preliminary approval that does not exceed 50 pages.

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