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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 AS MODIFIED**

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

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1 DATED: August 8, 2024

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~~PROPOSED~~ ORDER AS MODIFIED

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 40⁴⁰ 50 pages.

DATED: August 13, 2024


The Hon. Edward M. Chen
United States District Judge