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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-01418-EMC-KAW

PLAINTIFFS' ADMINISTRATIVE MOTION TO CONSIDER WHETHER ANOTHER PARTY'S MATERIALS SHOULD BE SEALED

Hon. Edward M. Chen

Pursuant to Civil Local Rule 79-5(f) and the Stipulated Protective Order entered by the Court on December 17, 2021 (ECF No. 70), Plaintiffs request that the Court consider whether material designated as "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY" should be filed under seal. Specifically, Defendant has designated as "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY" the portions of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement ("Motion"):

Provisionally Sealed Portion(s) of Motion	Evidence Offered in Support of Sealing
Page 19, line 17 (between "period, is" and end of sentence")	Def. to provide evidence per L.R. 79-5(f)
Page 26, line 21 (between "approximately" and "of Plaintiffs' maximum recovery")	Def. to provide evidence per L.R. 79-5(f)
Page 26, line 26 (between "$27,500,000 is" and "% of")	Def. to provide evidence per L.R. 79-5(f)
Page 26, line 26 (between "% of" and end of sentence)	Def. to provide evidence per L.R. 79-5(f)
Page 26, line 28 (between "approximately" and end of sentence)	Def. to provide evidence per L.R. 79-5(f)

The following portions of the Declaration of Andre M. Mura and Geoffrey Graber in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement ("Co-Lead Counsel Decl.") also quote from or otherwise refer to expert reports or material produced in discovery by Defendant that has been designated as "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY" by Defendant:

Provisionally Sealed Portion of Co-Lead Counsel Decl.	Evidence Offered in Support of Sealing
Page 1 line 24 to Page 2 line 8 (between "First," and end of sentence)	Def. to provide evidence per L.R. 79-5(f)
Page 5, line 11 (between "to be" and end of sentence)	Def. to provide evidence per L.R. 79-5(f)
Exhibit 2, Comparator Table, second from the bottom row of table, far right cell (entire cell for the row "Total Potential Exposure" and column "This Settlement")	Def. to provide evidence per L.R. 79-5(f)

Pursuant to Local Rule 79-5(f)(3), Defendant, as the Designating Party, bears the responsibility to establish that its designated materials are sealable. Plaintiffs provisionally file these documents under seal to give Defendant an opportunity to specify any reasons for keeping the documents under seal pursuant to Local Rule 79-5(c).

DATED: August 29, 2024

Respectfully submitted,

/s/ Andre M. Mura
Andre M. Mura

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