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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

**DECLARATION OF ANDRE M. MURA IN
SUPPORT OF PLAINTIFFS'
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIALS SHOULD BE
SEALED**

Hon. Edward M. Chen

DECLARATION OF ANDRE M. MURA IN SUPPORT OF PLAINTIFFS'
ADMINISTRATIVE MOTION TO CONSIDER WHETHER ANOTHER PARTY'S
MATERIALS SHOULD BE SEALED
Case No. 3:21-cv-01418-EMC-KAW

1 I, Andre M. Mura, declare:

2 1. I am a member in good standing of the Bar of California and the bar of this
3 Court. I am a partner at Gibbs Law Group LLP in Oakland, California, and represent
4 Plaintiffs in this matter.

5 2. I have personal knowledge of the facts set forth herein and, if called as a
6 witness, could and would testify competently to them.

7 3. I submit this declaration in support of Plaintiffs' Administrative Motion to
8 Consider Whether Another Party's Material Should Be Sealed.

9 4. Pursuant to Local Rule 79-5(f), I hereby state that the following portions of
10 Plaintiffs' Motion for Preliminary Approval of Class Action Settlement ("Motion") quote
11 from or otherwise refer to material produced in discovery by Defendant that has been
12 designated as "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL - ATTORNEYS' EYES
13 ONLY" by Defendant under the operative Stipulated Protective Order in this action. *See* ECF
14 No. 70.

Portion of Motion
Page 19, line 17 (between "period, is" and end of sentence")
Page 26, line 21 (between "approximately" and "of Plaintiffs' maximum recovery")
Page 26, line 26 (between "\$27,500,000 is" and "% of")
Page 26, line 26 (between "% of" and end of sentence)
Page 26, line 28 (between "approximately" and end of sentence)

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22 5. The following portions of the Declaration of Andre M. Mura and Geoffrey
23 Graber in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement
24 ("Co-Lead Counsel Decl.") also quote from or otherwise refer to expert reports or material
25 produced in discovery by Defendant that has been designated as "CONFIDENTIAL" or
26 "HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY" by Defendant under the
27 operative Stipulated Protective Order in this action. *See* ECF No. 70:
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1	Portion of Co-Lead Counsel Decl.
2	Page 1 line 24 to Page 2 line 8 (between "First," and end of sentence)
3	Page 5, line 11 (between "to be" and end of sentence)
4	Exhibit 2, Comparator Table, second from the bottom row of table, far right cell
5	(entire cell for the row "Total Potential Exposure" and column "This Settlement")

6
7 I declare that the foregoing is true and correct. Executed on August 29, 2024.

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9 /s/ Andre M. Mura
10 Andre M. Mura
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