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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 FILE UNDER SEAL

Hon. Edward M. Chen

I, Andre M. Mura, declare:

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

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

3. I submit this declaration in support of Plaintiffs' Administrative Motion to File Under Seal.

4. Pursuant to Local Rule 79-5(c), I hereby state that the following portions of the Parties' Master Settlement Agreement ("Settlement"), which is attached as Exhibit 1 to the Declaration of Andre Mura and Geoffrey Graber in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement, refer to the specific opt-out threshold that would trigger settlement failure here.

Portion of Settlement
Section VII, paragraph 7, first sentence (between "timely requests for exclusion exceeds" and ", Thomson Reuters may elect to terminate this Agreement")

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

/s/ Andre M. Mura
Andre M. Mura