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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-1418-EMC-KAW

DECLARATION OF CAT BROOKS IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF CLASS SETTLEMENT

I, Cat Brooks, declare under penalty of perjury:

1. I base this declaration on my personal knowledge of the facts and, if called upon to do so, could and would testify competently to the facts contained in this declaration. I understand that this declaration will be used to support Plaintiffs' motion for preliminary approval of the class action settlement in the above-captioned case.

2. I live in Oakland, California, and am an activist, organizer, playwright, and performer. I am the executive director of Justice Teams Network and the Anti-Police-Terror Project, and I host the radio show Law & Disorder on KPFA. I was raised in an activist household and have dedicated my life to improving the lives of people in my community and bringing awareness to injustices we face through politics, writing, art, and other media.

3. I became a named Plaintiff in this class action because it is my understanding that most Californians are not even aware of CLEAR and may not know that Thomson Reuters is selling access to their information to its customers. I believed that a class lawsuit would save time, money, and effort, and help prevent Californians' personal information from being made available without their knowledge or consent.

4. As a named plaintiff, I have actively participated in this litigation. Among other things, I helped review drafts of the complaint. During discovery, I searched for and produced relevant documents that I had. I worked closely with Plaintiffs' counsel to prepare responses to Thomson Reuters' discovery requests. And I was deposed and spent time with Plaintiffs' counsel preparing for that deposition.

5. Throughout my time as a named plaintiff, I have kept in touch with Plaintiffs' counsel and received regular updates on the case. Plaintiffs' counsel has also reviewed the terms of the settlement agreement with me.

6. I am happy with the terms of the settlement agreement. I think the Court should approve it. I think it's great. The lawyers did a great job and the benefits for Californians are what I was hoping for when I brought this lawsuit. I think this settlement will help other Californians learn about CLEAR and more easily remove their information from CLEAR and the sources that supply it.

7. When we asked the Court to certify a class in this case, I declared that I understood the responsibilities of a class representative to protect the interests of the class, that I was prepared to serve in that role, and that I was unaware of any conflict that would prevent me from fairly or adequately representing the class. I remain willing and able to perform all of the duties and obligations of a representative of the settlement class until this matter is finally resolved.

8. I also understand that I am entitled to only the rights and remedies of settlement class members under the settlement agreement, and not to any additional compensation by virtue of my status as a settlement class representative.

9. I authorize Class Counsel Andre Mura and Geoffrey Graber to enter into this Agreement with respect to the claims asserted in the action and any other claims covered by the release.

I declare under penalty of perjury that the foregoing is true and correct. Executed on 08 / 09 / 2024.

Cat Brooks

Cat Brooks

Signature Certificate

Reference number: AURHT-EEZXU-MMVF8-7SPEY

Signer	Timestamp	Signature
Cat Brooks Email: cat@justiceteams.org		
Sent:	07 Aug 2024 16:09:35 UTC	
Viewed:	09 Aug 2024 16:22:59 UTC	
Signed:	09 Aug 2024 16:23:09 UTC	
Recipient Verification:		IP address: 76.21.29.163
✔Email verified	09 Aug 2024 16:22:59 UTC	Location: Oakland, United States

Document completed by all parties on:
09 Aug 2024 16:23:09 UTC

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