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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 RASHEED SHABAZZ IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF CLASS SETTLEMENT

I, Rasheed Shabazz, 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 am a resident of Alameda, California, and am a journalist and community organizer. I received a masters of City and Regional Planning at UC Berkeley, and I currently serve in a variety of roles in which I work to inspire, support, and uplift voices in my community through public history, multimedia, and youth development projects. I care deeply about issues of fairness affecting my community and have spent considerable time and effort working to support people seeking justice in housing, education, and other aspects of civic life.

3. I became a named Plaintiff in this class action because it is my understanding that most Californians are not even aware of CLEAR or 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. I helped review drafts of the complaint. I searched for and produced relevant documents that I had. I worked closely with Plaintiffs' counsel to prepare responses to Thomson Reuters' discovery requests. I was deposed and I 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 and think the Court should approve it. The settlement accomplishes what I hoped for when I decided to bring this case. It makes it easier for Californians to learn about CLEAR. It makes it easier for Californians to get their information out of CLEAR. And it requires Thomson Reuters to take steps to be protective of Californians' privacy while they operate CLEAR.

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 / 08 / 2024.

Rasheed Shabazz

Rasheed Shabazz

Signature Certificate

Reference number: K9S8A-T8WE7-IQWDU-JMMXC

Signer	Timestamp	Signature
Rasheed Shabazz Email: rasheed@berkeley.edu		
Sent:	07 Aug 2024 16:10:13 UTC	
Viewed:	08 Aug 2024 17:49:19 UTC	IP address: 207.151.52.244
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