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UNITED STATES DISTRICT COURT

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

DEFENDANT THOMSON REUTERS' STATEMENT IN SUPPORT OF PLAINTIFFS' ADMINISTRATIVE MOTION TO SEAL

Pursuant to Local Rule 7-11(b), Defendant Thomson Reuters submits this Statement in Support of Plaintiffs' Administrative Motion to File Under Seal (Doc. 240), filed on August 29, 2024.

As Plaintiffs note, there are compelling reasons to seal the exact opt-out threshold to prevent third parties from using that figure to obstruct the settlement. *See, e.g., In re Lyft Inc. Sec. Litg.*, No. 19-cv-02690-HSG, 2023 WL 2960006, at *2 (N.D. Cal. Mar. 16, 2023) (sealing opt-out threshold); *In re Anthem, Inc. Data Breach Litig.*, No. 15-MD-02617-LHK, 2017 WL 9614789, at *2 (N.D. Cal. Aug. 25, 2017) (same). Plaintiffs' request is appropriately narrowly tailored because they request to seal only the threshold itself. *See id.* Therefore, Plaintiffs' motion to seal should be granted.[1]

Dated: September 3, 2024

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[1] Thomson Reuters endorses Plaintiffs' proposed order filed at Doc. 240-3.