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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

**[PROPOSED] ORDER RE PLAINTIFFS'
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIALS SHOULD BE
SEALED**

[PROPOSED] ORDER

The Court, having considered Plaintiffs' Administrative Motion to Consider Whether Another Party's Materials Should be Sealed (Doc. 239), Defendant Thomson Reuters' Statement in Response and all supporting materials, including the Declaration of Kevin Appold, finds that compelling reasons exist to seal the following portions of Plaintiffs' Notice of Motion and Motion for Preliminary Approval of Class Settlement (Doc. 241) and Declaration of Andre Mura and Geoffrey Graber in Support of Plaintiffs' Motion for Preliminary Approval of Class Settlement (Doc. 241-1):

Cite	Portion(s) to Seal
Doc. 241 Motion (19:17)	Page 19, line 17 (between "period, is" and end of sentence)
Doc. 241 Motion (26:21)	Page 26, line 21 (between "approximately" and "of")
Doc. 241 Motion (26 fn. 14)	Page 26, fn. 14 (between "is" and "%," between "of" and end of first sentence, and between "approximately" and "%")
Doc. 241-1 Decl. (1:24–2:8)	Page 1, line 24 (everything after "First,") through Page 2, line 8 (everything before "Second,")
Doc. 241-1 Decl. (5:11)	Page 5, line 11 (between "be" and end of sentence)
Doc. 241-1 Decl. Ex. 2.	Final page of Exhibit 2 (ECF Page 43), far right column, second row from bottom.

1 IT IS SO ORDERED.

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3 DATED: _____

4 Judge: Hon. Edward M. Chen
5 United States District Judge

6 Submitted by:

7 PERKINS COIE LLP

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9 By: /s/ Hayden Schottlaender
10 Hayden Schottlaender

11 Attorneys for Defendant
12 Thomson Reuters Corporation
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