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7 *Attorneys for Plaintiffs and the Class*
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12 **UNITED STATES DISTRICT COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**
14 **SAN FRANCISCO DIVISION**

14 CAT BROOKS and RASHEED
15 SHABAZZ, individually and on behalf of
all others similarly situated,

16 Plaintiffs,

17 v.

18 THOMSON REUTERS CORPORATION,

19 Defendant.
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Case No. 3:21-cv-01418-EMC-KAW

**SUPPLEMENTAL DECLARATION OF
STEVEN WEISBROT OF ANGEION GROUP
RE: SETTLEMENT ADMINISTRATION
PROTOCOL & PROPOSED NOTICE PLAN**

Redacted - Publicly Filed Version

1 I, Steven Weisbrot, declare and state as follows:

2 1. I am the President and Chief Executive Officer at the class action notice and claims
3 administration firm Angeion Group, LLC (“Angeion”). Angeion specializes in designing,
4 developing, analyzing, and implementing large-scale, un-biased, legal notification plans.

5 2. My credentials were provided in my previous declaration describing the proposed
6 Notice Plan (“Notice Plan Declaration”) (Dkt. No. 241-2).

7 3. The purpose of this declaration is to provide the Court with additional information
8 pursuant to this Court’s Order re: Supplemental Briefing and/or Evidence (“Order”) (Dkt. No. 246).

9 **CLASS SIZE, CLAIMS RATE & ESTIMATED AWARD AMOUNT**

10 4. Angeion has been informed that while determining the class size with exact precision
11 is not possible, it is Angeion’s understanding the estimated class size to be approximately forty
12 million people based on data from the U.S. Census Bureau. *See* Plaintiffs’ Motion for Preliminary
13 Approval (Dkt. No. 241 at 8-9).

14 5. Angeion previously estimated that the claims rate in this settlement will be between
15 1% and 2.5%. Notice Plan Declaration, ¶ 45.

16 6. For illustrative purposes, the chart below provides the total number of claims that
17 correspond to claims rates of 1% and 2.5% based on a class size of forty million individuals.

18

Claims Rate	Total Claims
1.00%	400,000
2.50%	1,000,000

19

20 7. The chart below illustrates the estimated per claim award amounts based on these
21 claims rates. Note: the number of claims submitted affects the estimated total administration costs.
22 The estimated award amounts also assume Attorneys’ Fees in the amount of \$6,875,000.00,
23 Expenses in the amount of \$700,000.00, and Service Awards totaling \$10,000.00.

24

Claims Rate	Estimated Award Amount
1.00%	\$48.78
2.50%	\$19.43

25
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27
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SETTLEMENT NOTICE & ADMINISTRATION COSTS

8. Angeion's detailed estimate to provide notice and administration services is attached hereto as **Exhibit A**. Pursuant to the Court's Order, Angeion respectfully requests that this Exhibit be filed under seal.

9. Included in Exhibit A is Angeion's adjusted detailed estimate assuming a class size of 40,000,000 and a 2.5% claim filing rate. Additional costs for publication and translation services (discussed below) have also been incorporated into this revised estimate.

ADDITIONAL NOTICE DETAILS

10. This section addresses the questions posed in sections G, H, and I of the Order.

Should there be some kind of publication notice as well in recognition that all class members may not use computers or use them in such a way that they would be exposed to the proposed media campaign?

11. After conferring with the Parties, notice of the settlement will be published in the California regional edition of *USA Today* for a duration of five (5) weeks. One (1) black and white ¼-page insertion in the California regional edition of *USA Today* will be published each week commencing seven (7) days after an Order granting preliminary approval is entered and concluding on or around thirty-five (35) days after the issuance of that Order.

The class is defined as those who lived in California during a set period of time. Can the parties provide more information as to how people who moved away from California will get notice if the target audience is primarily California residents?

12. The Notice Plan Declaration provides for an additional allocation of digital and social media advertisements to be served both nationally and specifically targeted within the top six states where Californians have relocated over the class period.¹ *Id.* ¶ 31.

A settlement website will be maintained, with copies of the long-form notice available in English and Spanish. See Mot. at 4. Should the notice be available in other languages given the diverse

¹ See 2023 Allied US Moving Migration Report, <https://www.allied.com/migration-map> (Last visited September 17, 2024).

1 **population in California?**

2 13. The United Census Bureau - California State Profile indicates that English and Spanish
3 account for nearly 84% of the language type spoken at home in California, with “Asian and Pacific
4 Islander languages” accounting for 10.2%.² Further, Census 2020 identified the top five (5) non-
5 English languages spoken in California as: Spanish, Chinese, Vietnamese, Tagalog, and Korean.³

6 14. The additional cost to translate the Long-Form Class Notice is provided in Exhibit A.
7 While it has been Angeion’s experience that making the Long-Form notice available in multiple
8 languages is not common, even in California classes/subclasses, Angeion is prepared to translate the
9 notices as directed by the Court.

10 15. It is also worth noting that if needed, Angeion can utilize its live translation services
11 that are designed to support over 350 different languages to provide support to Settlement Class
12 Members.

13 **Could the settlement administrator contact class members to clear up any conflicts? (where**
14 **both a claim form and opt out is submitted)**

15 16. Angeion will work with Class Counsel to resolve any conflicts in which Settlement
16 Class Members submit both a claim form and exclusion form.

17 **Language of Class Notice (Section I of the Order)**

18 17. The Long-Form Class Notice has been revised to incorporate the edits outlined in the
19 Order and is attached hereto as **Exhibit B**. It is important to note that Angeion generally advises
20 against providing an estimated payment amount in the notice(s) when that payment amount is
21 determined by the number of valid claims submitted. It has been Angeion’s experience that if the
22 number of claims submitted deviates from what was anticipated, resulting in a lower payment amount
23 than estimated, the class member reaction is both vocal and strongly negative. This is in contrast to
24 similar settlement payment amounts where the award amount was not provided in the notice, *i.e.*, not
25 creating expectations from class members and the class member response to the payment amount

26 _____
27 ² See United Census Bureau: California State Profile

<https://data.census.gov/profile/California?g=040XX00US06> (Last visited September 19, 2024);

³ <https://census.ca.gov/wp-content/uploads/sites/4/2019/06/LACAP.pdf> (Last visited September 19, 2024)

1 issued was negligible, if not non-existent.

2 18. The Claim Form requirement that a claimant provide their exact California address
3 was deliberate as part of our holistic defense-in-depth fraud prevention efforts. The California address
4 requirement has been removed but text was added to the attestation section that states: "I understand
5 that the Settlement Administrator may contact me to request additional information to confirm my
6 membership in the Settlement Class and that failure to provide the Settlement Administrator with the
7 requested information may result in the denial of my Claim Form." The revised Claim Form is
8 attached hereto as **Exhibit C**.

9 19. The Exclusion Form has been revised to inform Settlement Class Members that they
10 may submit their Exclusion Form online at ClearPrivacySettlement.com, or by completing and
11 submitting the Exclusion Form by mail. The revised Exclusion Form is attached hereto as **Exhibit D**.

12 20. The Sample Digital Ads have been revised to state: "If you resided in California for
13 any period of time between December 3, 2016 and [October 30, 2024], you may be entitled to a
14 payment from a class action settlement. Click here for more information." We incorporated the
15 reference to a settlement payment but recommend against adding additional text, such as an estimated
16 payment range, which would decrease the font size displayed on the ads, potentially making them
17 difficult to read. Once the digital ad is clicked, the individual is directed to the Settlement Website
18 where additional information about the Settlement, including the estimated payment amounts, will be
19 prominently displayed pursuant to the Court's instruction. The revised Sample Digital Ads are
20 attached hereto as **Exhibit E**.

21 CONCLUSION

22 21. As discussed in the Notice Plan Declaration, the proposed Notice Plan provides for a
23 comprehensive state-of-the-art multi-faceted media campaign designed to deliver an approximate
24 75.30% reach and the implementation of a dedicated Settlement Website and toll-free telephone line
25 where Settlement Class Members can learn more about their rights and options pursuant to the terms
26 of the Settlement. This percentage is calculated using objective syndicated advertising data relied
27 upon by most advertising agencies and brand advertisers. It is further verified by sophisticated media
28

1 software and calculation engines that cross reference which media is being purchased with the media
2 habits of our specific Target Audience. What this means in practice is that 75.30% of our Target
3 Audience will see an advertisement concerning the settlement an average of 3.09 times each.

4 22. The Federal Judicial Center states that a publication notice plan that reaches 70% of
5 class members is one that reaches a “high percentage” and is within the “norm.” Barbara J. Rothstein
6 & Thomas E. Willging, Federal Judicial Center, “Managing Class Action Litigation: A Pocket Guide
7 or Judges,” at 27 (3d Ed. 2010).

8 23. It remains my professional opinion that the proposed Notice Plan will provide full and
9 proper notice to Settlement Class Members and is the best practicable notice under the circumstances,
10 fulfilling all due process requirements, fully comporting with Fed. R. Civ. P. 23, and the Northern
11 District’s Procedural Guidance for Class Action Settlements.

12 I hereby declare under penalty of perjury that the foregoing is true and correct.

13 Dated: September 25, 2024

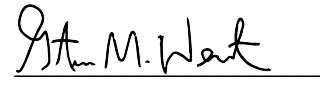
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15 STEVEN WEISBROT
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EXHIBIT FILED UNDER SEAL

EXHIBIT B

REVISED LONG-FORM NOTICE



United States District Court for the Northern District of California

Brooks v. Thomson Reuters Corp.

Case No. 3:21-cv-01418

Class Action Notice

Authorized by the U.S. District Court

Did you reside in California for any period of time between December 3, 2016 and [October 30, 2024]?

There is a \$27,500,000 settlement of a lawsuit.

You may be entitled to money.

The amount depends on the number of claims submitted but is estimated between \$19 and \$48.

To be part of this settlement, you should:

Read this notice.

Respond by [date].

Important things to know:

- If you take no action, you will still be bound by the settlement, and your rights will be affected.
- You can learn more at: ClearPrivacySettlement.com.

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About This Notice

Why did I get this notice?

This notice is to tell you about the settlement of a class action lawsuit, *Brooks v. Thomson Reuters Corp.* brought on behalf of current and former California residents who allege that Thomson Reuters made information about them available for sale through its product, CLEAR. **You received this notice because you may be a member of the group of people affected, called the “class.” You may be entitled to monetary relief as a part of this class action settlement. At this time, it is impossible to precisely estimate how much money is available per class member, as it will depend on how many class members submit claims. Current estimates suggest that you may be entitled to between \$19 and \$48.**

This notice gives you a summary of the terms of the proposed settlement agreement, explains what rights class members have, and helps class members make informed decisions about what action to take.

What do I do next?

Read this notice to understand the settlement and to determine if you are a class member. Then, decide if you want to:

Options	More information about each option
Submit a Claim Form	You must submit a claim to receive payment. You will be bound by the settlement.
Do Nothing	Get no payment. Give up rights resolved by settlement.
Opt Out	Get no payment. Allows you to bring another lawsuit against Thomson Reuters about the same issues.
Object	Tell the Court why you don't like the settlement. If you object, you are still a member of the class unless you also submit a timely opt out. If you object, you must also submit a claim form to receive money.

Read on to understand the specifics of the settlement and what each choice would mean for you.

What are the most important dates?

Your deadline to object or opt out: **[date]**

Settlement approval hearing: **[date]**

Your deadline to submit a claim form: **[date]**

Learning About the Lawsuit

What is this lawsuit about?

In December 2020, this class action lawsuit was filed against Thomson Reuters. The lawsuit was brought on behalf of current and former California residents who allege that Thomson Reuters made information about them available for sale through its product, CLEAR. The lawsuits claim that Thomson Reuters violated Californians' privacy rights by selling access to their personal information without Californians' consent.

Thomson Reuters denies that it did anything wrong.

Where can I learn more?

You can get a complete copy of the proposed settlement and other key documents in this lawsuit at:
ClearPrivacySettlement.com

Why is there a settlement in this lawsuit?

In 2024, the parties agreed to settle, which means they have reached an agreement to resolve the lawsuit. Both sides want to avoid the risk and expense of further litigation.

The settlement is on behalf of the Californians who brought the case and all members of the settlement class, which includes all persons who, between December 3, 2016 and [October 30, 2024], both resided in the State of California and whose information Thomson Reuters made available through the CLEAR product. The Court has not decided this case in favor of either side.

What is a class action settlement?

A class action settlement is an agreement between the parties to resolve and end the case. Settlements can provide money to class members and changes to the practices that caused the harm.

What happens next in this lawsuit?

The Court will hold a Fairness hearing to decide whether to approve the settlement. The hearing will be held at:

Where: United States District Court for the Northern District of California, San Francisco Courthouse, Courtroom 5, 17th Floor, 450 Golden Gate Avenue, San Francisco, CA 94102

When: [time] on [date].

The Court has directed the parties to send you this notice about the proposed settlement. Because the settlement of a class action decides the rights of all members of the proposed class, the Court must give final approval to the settlement before it can take effect. Payments will only be made if the Court approves the settlement.

You don't have to attend, but you may at your own expense. You may also ask the Court for permission to speak and express your opinion about the settlement. If the Court does not approve the settlement or the parties decide to end it, it will be void and the lawsuit will continue. **The date of the hearing may change without further notice to members of the class.** To learn more and confirm the hearing date, go to ClearPrivacySettlement.com.

Learning About the Settlement

What does the settlement provide?

The settlement provides both monetary and injunctive relief to class members. More specifically, the settlement pays money to current and former California residents whose information was allegedly made available through Thomson Reuters' product, CLEAR, and will require Thomson Reuters to change some of its practices in operating CLEAR. Thomson Reuters has agreed to enhance its opt-out procedure for Californians looking to delete their personal information from CLEAR or review the information about them in CLEAR, make more information about CLEAR available to Californians who want to know more about how their information is used, and make a series of changes to CLEAR's settings and Thomson Reuters' practices in managing CLEAR. The full terms of the settlement, including the specific business practice changes that Thomson

Reuters has agreed to implement, can be found at [ClearPrivacySettlement.com](https://clearprivacysettlement.com).

Thomson Reuters has agreed to pay \$27,500,000 into a settlement fund. This money will be divided among the class members and will also be used to pay for costs and fees approved by the Court, including attorneys' fees (which is \$6,875,000 or 25% of the settlement fund), attorneys' costs incurred in litigating this case (which will not exceed \$700,000) and the cost of administering this settlement (expected to be no more than \$485,000). After deductions, remaining funds will be divided equally among class members who timely submit claim forms. A precise estimate of the amount each class member will receive is not possible at this time, as it depends on the number of claims that are submitted. **However, based on current estimates, it is expected that class members may receive between \$19 and \$48.** Members of the settlement class will "release" their claims as part of the settlement, which means, at a minimum, they cannot sue Thomson Reuters for the same issues in this lawsuit. The full terms of the release can be found at [ClearPrivacySettlement.com](https://clearprivacysettlement.com).

If there is money left over after the claims process is completed, it will be donated to organization(s) approved by the Court.

How do I know if I am part of this settlement?

If you resided in California for any period of time between December 3, 2016 and [October 30, 2024], and were 18 years old (or older) during that time, you may be a member of the class and entitled to money.

How much will my payment be?

The amount of the payments to individual class members will depend on the number of valid claims submitted. Because the final payment amount cannot be calculated before all claims for compensation are received and verified, it is not possible to provide the precise amounts of the payment for each valid claim before the deadline to file claims. **However, based on current estimates, individual class members can expect to receive between \$19 and \$48.**

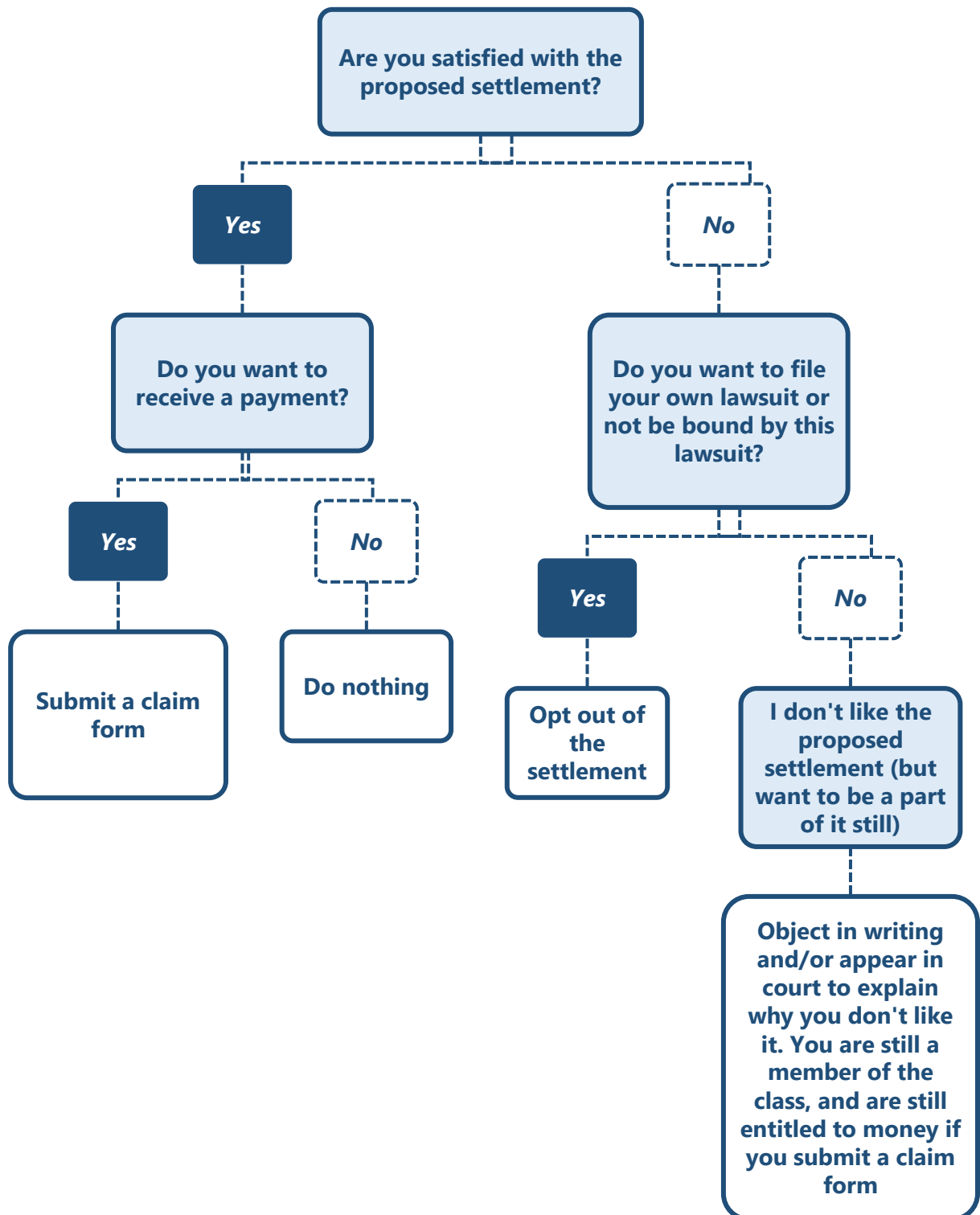
Deciding What to Do

How do I weigh my options?

You have four options. You can stay in the settlement and submit a claim, you can opt out of the settlement, you can object to the settlement, or you can do nothing. This chart shows the effects of each option:

	Submit a Claim	Opt out	Object	Do Nothing
Can I receive settlement money if I . . .	YES	NO	YES (If you also submit a claim)	NO
Am I bound by the terms of this lawsuit if I . . .	YES	NO	YES	YES
Can I pursue my own case if I . . .	NO	YES	NO	NO
Will the class lawyers represent me if I . . .	YES	NO	NO	YES

Choose the best path for you:



Submitting a Claim

How do I get a payment if I am a class member?

If you wish to receive money, you must submit a completed claim form to the Settlement Administrator online or download a claim form at ClearPrivacySettlement.com and mail a completed form to the Settlement Administrator (address below). To submit a proper claim form, you will have to sign a statement that you lived in California for any period of time between December 3, 2016 and [October 30, 2024]. That statement will be made under penalty of perjury, which means that if you knowingly provide false information in that statement, it is a felony.

You must submit a claim form by [date] to receive money from the settlement.

Do I have a lawyer in this lawsuit?

In a class action, the court appoints class representatives and lawyers to work on the case and represent the interests of all the class members. For this settlement, the Court has appointed the following individuals and lawyers.

Your lawyers:

Andre M. Mura
Gibbs Law Group LLP
1111 Broadway, Suite 2100
Oakland, CA 94067

Geoffrey A. Graber
Cohen Milstein Sellers & Toll PLLC
1100 New York Ave. NW, Fifth
Floor
Washington, DC 20005

These are the lawyers who negotiated this settlement on your behalf.

If you want to be represented by your own lawyer, you may hire one at your own expense.

Do I have to pay the lawyers in this lawsuit?

Lawyers' fees and costs will be paid from the Settlement Fund. **You will not have to pay the lawyers directly.**

To date, your lawyers have not been paid any money for their work or the expenses that they have paid for the case. To pay for some of their time and risk in bringing this case without any guarantee of payment unless they were successful, your lawyers will request, as part of the final approval of this Settlement, that the Court approve a payment for their legal services, a request that will not ask for more than \$6,875,000 (25%) total in attorneys' fees plus the reimbursement of out-of-pocket expenses (which will not exceed \$700,000). Your lawyers will also ask the Court to approve the costs of administering this settlement as those costs are incurred, which are currently estimated to be \$485,000.

Lawyers' fees and expenses will only be awarded if approved by the Court as a fair and reasonable amount. You have the right to object to the lawyers' fees even if you think the settlement terms are fair.

Your lawyers will also ask the Court to approve a payment of \$5,000 to each of the two Class Representatives for the time and effort they contributed to the case. If approved by the Court, this will be paid from the Settlement Fund.

Opting Out

What if I don't want to be part of this settlement?

You can opt out. If you do, you will not receive payment and cannot object to the settlement. However, you will not be bound or affected by anything that happens in this lawsuit and may be able to file your own case. You cannot exclude yourself from the program changes called for by the proposed settlement. The section below tells you how to submit an opt out (by mail or online).

You must submit an opt out by [date] to exclude yourself from the settlement.

How do I opt out?

To opt out of the settlement, you must complete the opt out form available at ClearPrivacySettlement.com and mail it by [date] to the Settlement Administrator at:

CLEAR Privacy Settlement
Attn: Opt Outs
P.O. Box 58220
Philadelphia, PA 19102

Be sure to include your name, address, telephone number (and/or email address), and signature. The full instructions for submitting an opt-out are available at ClearPrivacySettlement.com.

You may also submit an opt-out form online at ClearPrivacySettlement.com.

Objecting

What if I disagree with the settlement?

If you disagree with any part of the settlement (including the lawyers' fees) but don't want to opt out, you may object. If you object, you are still a class member, and you must still submit a separate claim form if you want to receive money from the settlement. When you submit your objection, you must give reasons why you think the Court should not approve it and say whether your objection applies to just you, a part of the class, or the entire class. The Court will consider your views. The Court can only approve or deny the settlement — it cannot change the terms of the settlement. You may, but don't need to, hire your own lawyer to help you.

To object, you must send a letter to the Court that:

- (1) is received by [date];
- (2) includes the case name and number (*Brooks v. Thomson Reuters Corp.*, No. 3:21-cv-01418)
- (3) includes your full name, address and telephone number, and email address (if you have one);
- (4) states the reasons for your objection;

- (5) says whether either you or your lawyer intend to appear at the final approval hearing and your lawyer's name;
- (6) your signature.

You must mail your letter to the Court by [date] for your objection to be valid. Mail the letter to:

	U.S. District Court San Francisco Courthouse, Courtroom 5 - 17th Floor 450 Golden Gate Avenue San Francisco, CA 94102
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Doing Nothing

What are the consequences of doing nothing?

If you do nothing, you will not get any money, but you will still be bound by the settlement and its "release" provisions. That means you won't be able to start, continue, or be part of any other lawsuit against, at minimum, Thomson Reuters about the issues in this case. Please see the settlement agreement, which can be found at ClearPrivacySettlement.com for a full description of the claims and persons who will be released if this settlement is approved.

Key Resources

How do I get more information?

This notice is a summary of the proposed settlement. The complete settlement with all its terms can be found here. To get a copy of the settlement agreement or get answers to your questions:

- contact your lawyer (information below)
- visit the case website at ClearPrivacySettlement.com
- access the Court Electronic Records (PACER) system online or by visiting the Clerk's office of the Court (address below).

Resource	Contact Information
Case website	ClearPrivacySettlement.com
Settlement Administrator	CLEAR Privacy Settlement c/o Settlement Administrator 1650 Arch Street, Suite 2210 Philadelphia, PA 19103 [Phone Number] [Email Address]
Your Lawyers	Andre M. Mura Gibbs Law Group LLP 1111 Broadway, Suite 2100 Oakland, CA 94067 Geoffrey A. Graber Cohen Milstein Sellers & Toll PLLC 1100 New York Ave. NW, Fifth Floor Washington, DC 20005
Court (DO NOT CONTACT)	U.S. District Court San Francisco Courthouse, Courtroom 5 - 17th Floor 450 Golden Gate Avenue San Francisco, CA 94102

EXHIBIT C

REVISED CLAIM FORM

Your claim must be
submitted online or
received by:
[DEADLINE]

TRC
CLAIM

CLEAR PRIVACY SETTLEMENT CLAIM FORM

I. SETTLEMENT CLASS MEMBER NAME AND CONTACT INFORMATION

Provide your name, mailing address, telephone and/or email address. You must notify the Settlement Administrator if your contact information changes after you submit this Claim Form.

First Name

Last Name

Street Address

City

State

Zip Code

Email Address

Telephone Number

II. PAYMENT SELECTION

Please select from **one** of the following payment options:

☐ **Venmo** - Enter the mobile number associated with your Venmo account: ____ - ____ - ____

☐ **Zelle** - Enter the mobile number or email address associated with your Zelle account:

Mobile Number: ____ - ____ - ____ or Email Address: _____

☐ **Virtual Prepaid Card** - Enter your email address: _____

☐ **Physical Check** - Payment will be mailed to the address provided in Section I above.

III. ATTESTATION & SIGNATURE

By signing below and submitting this Claim Form, I hereby swear under penalty of perjury that I resided in California for any period of time between December 3, 2016 and **[October 30, 2024]**.

I understand that the Settlement Administrator may contact me to request additional information to confirm my membership in the Settlement Class and that failure to provide the Settlement Administrator with the requested information may result in the denial of my Claim Form.

Signature

Printed Name

Date

Mail your completed Claim Form to:

CLEAR Privacy Settlement, c/o Settlement Administrator, 1650 Arch Street, Suite 2210, Philadelphia, PA 19103.

EXHIBIT D

REVISED EXCLUSION FORM

Your request for
exclusion must be
received by:
[DATE]

TRC
EXCLUSION

**CLEAR PRIVACY SETTLEMENT
REQUEST FOR EXCLUSION**

Instructions: Visit www.clearprivacysettlement.com to submit your Exclusion Form online or complete and return this form to: CLEAR Privacy Settlement, Attn: Opt Outs, P.O. Box 58220, Philadelphia, PA 19102.

I. SETTLEMENT CLASS MEMBER NAME AND CONTACT INFORMATION

Provide your name, mailing address, telephone and/or email address.

First Name

Last Name

Street Address

City

State

Zip Code

Email Address

Telephone Number

II. SIGNATURE

By signing below and submitting this Request for Exclusion form, I swear under penalty of perjury that I resided in California for any period of time between December 3, 2016 and [October 30, 2024] and wish to exclude myself from the Settlement Class and do not wish to participate in the settlement in Brooks v. Thomson Reuters Corp., No. 3:21-cv-01418.

Signature

Printed Name

Date

EXHIBIT E

REVISED SAMPLE DIGITAL ADVERTISEMENTS

If you resided in **California** for any period of time between December 3, 2016 and [October 30, 2024], you may be entitled to a **payment** from a class action settlement.

[Click here for more information](#)

If you resided in **California** for any period of time between December 3, 2016 and [October 30, 2024], you may be entitled to a **payment** from a class action settlement.

[Click here for more information](#)

If you resided in **California** for any period of time between December 3, 2016 and [October 30, 2024], you may be entitled to a **payment** from a class action settlement.



[Click here for more information](#)

If you resided in
California for any
period of time
between December
3, 2016 and [October
30, 2024], you may be
entitled to a **payment**
from a class action
settlement.



[Click here for more information](#)