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Attorneys for Plaintiffs and the Certified 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-01418-EMC-KAW

STIPULATION AND [PROPOSED] ORDER APPROVING UPDATED CLASS NOTICE

Judge: Hon. Edward M. Chen

Pursuant to Civil Local Rule 7-12, the parties hereby stipulate as follows:

Whereas, on October 11, 2024, the Court granted Plaintiffs' Motion for Preliminary Approval of Class Action Settlement, ECF No. 259;

Whereas, the Court's Order Granting Preliminary Approval directed plaintiffs to begin notifying the class within seven (7) days of the Order, which is October 18, 2024;

Whereas, the Parties—working with Angeion Group, the settlement administrator—have now updated the placeholder dates in the long-form notice consistent with the deadlines in the Court's Order;

Whereas, the Parties have also made three edits to the long-form notice previously submitted to the Court at ECF No. 250-001 and approved at ECF No. 259, and are presenting those edits in redline to the Court in the interest of transparency:

- First, the long-form notice now includes language instructing class members on how to access the Court's Public Access to Court Electronic Records (PACER) system to receive more information and file any objections on the Court's docket (see pages 5, 11-12 of the redline);
- Second, the Court's Order states that opt-outs must be received by mail or submitted online by December 6, 2024. ECF No. 259 at 18. An edit has been made to the long-form notice at pages 12-13 of the redline to make sure that this is communicated more clearly; and
- Third, the Court's Order states that objections must be received by mail or through electronic filing by December 6, 2024. ECF No. 259 at ¶ 21. An edit has been made to the long-form notice at pages 13-14 of the redline to make sure that this is communicated more clearly.

Whereas, a redline of the long-form notice reflecting these edits is attached for ease of the Court's review;

Whereas, the Parties have also prepared a one-page notice for the publication notice in *USA Today*, which is attached for this Court's approval;

IT IS HEREBY STIPULATED AND AGREED, subject to the Court's approval, that the

updated long-form class notice and short-form publication class notice attached to this stipulation and [proposed] order are approved for dissemination to the class.

DATED: October 15, 2024

GIBBS LAW GROUP LLP

Respectfully submitted,

/s/ *Andre M. Mura*

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DATED: October 15, 2024

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Thomson Reuters Corporation

[PROPOSED] ORDER

PURSUANT TO STIPULATION, the updated long-form class notice and short-form publication class notice attached to this stipulation and [proposed] order are approved for dissemination to the class.

DATED: _____

_____
The Hon. Edward M. Chen
United States District Judge

ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from the other signatory.

/s/ Andre M. Mura