



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 3031, 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]December 6, 2024.**

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: www.ClearPrivacySettlement.com.

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How do I get more information?..... ~~1513~~¹²

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 submit a claim form~~
~~Your deadline to object or opt out:~~ **December 6, 2024**
~~Your deadline to object or opt out~~
~~Settlement approval hearing:~~ **December 6, 2024**
~~Settlement approval hearing~~
~~Your deadline to submit a claim form:~~ **February 13, 2025**

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.

All of the case documents that have been filed publicly in this case are also available online through the Court's Public Access to Court Electronic Records (PACER) system at <https://ecf.cand.uscourts.gov>. This case is called Brooks v. Thomson Reuters Corp. and the case number is 3:18-cv-01418-EMC. You may obtain case documents by visiting the office of the Clerk of the Court for the United States District Court for the Northern District of California, San Francisco Division, between 9:00 a.m. and 4:00 p.m., Monday through Friday, excluding Court holidays.

Where can I learn more?

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

Why is there a settlement in this lawsuit?

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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~~31, 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~~ 1:30 p.m. PT on February 13, 2025.

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 www.ClearPrivacySettlement.com.

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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 www.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 www.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 3031, 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:

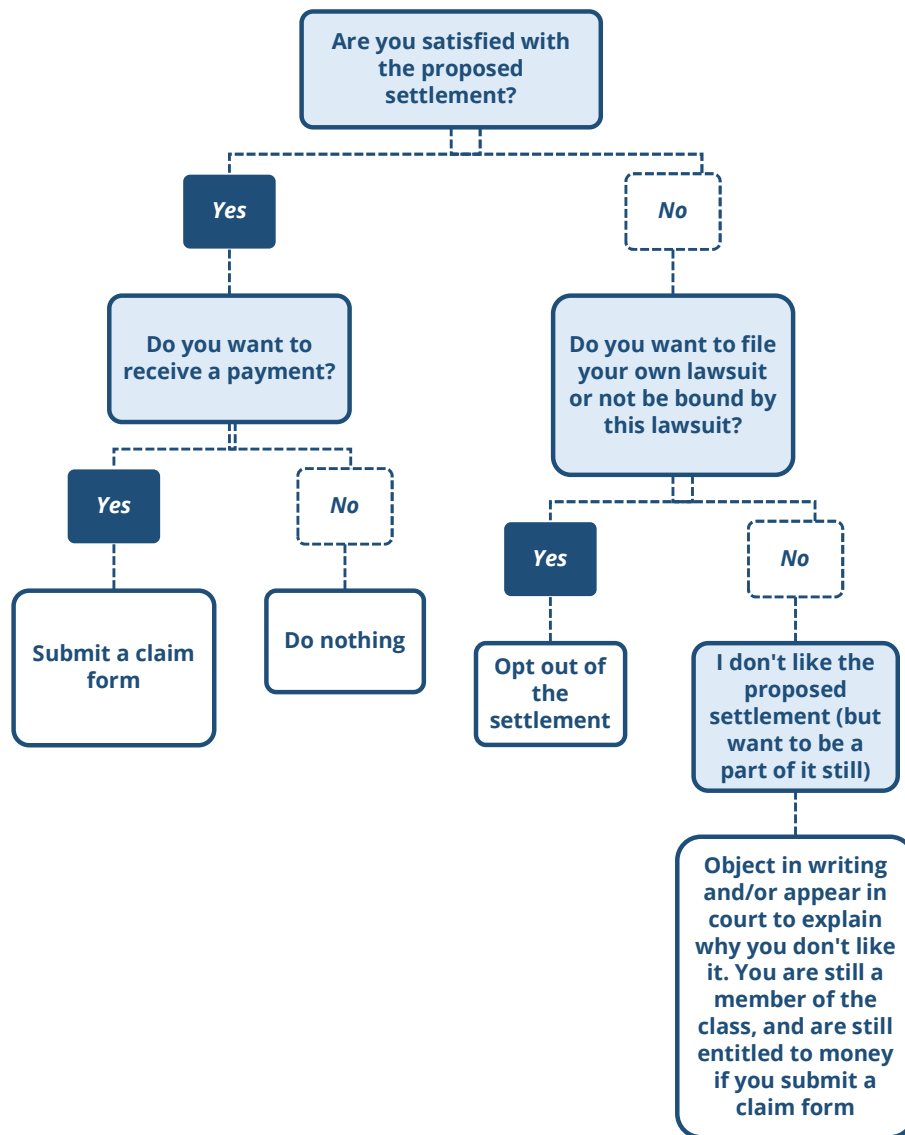
	Submit a Claim	Opt out	Object	Do Nothing
Can I receive settlement money if I . . .	YES	NO	YES (If you also submit a claim)	NO
Am I bound by the terms of this lawsuit if I . . .	YES	NO	YES	YES

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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 www.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, 2021~~, 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 ~~December 6, 2024~~[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
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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 that will be received by [date]December 6,

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2024 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 www.ClearPrivacySettlement.com and either submit the opt-out form online at www.ClearPrivacySettlement.com or mail it by ~~the date~~ to the Settlement Administrator at:

CLEAR Privacy Settlement Attn: Opt Outs P.O. Box 58220 Philadelphia, PA 19102
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Whether you submit the opt-out form online or send it by mail, it must be received by the settlement administrator by December 6, 2024 to be valid. 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 www.ClearPrivacySettlement.com.

~~You may also submit an opt-out form online at www.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

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lawyer to help you.

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

- (1) is received by ~~[date]~~December 6, 2024;
- (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.

Your ~~r must mail your~~ letter ~~to must be received by~~ the Court by ~~[date]~~December 6, 2024 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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You may also file your objection on the docket in this Action through the Court's PACER or Electronic Case Filing system by December 6, 2024. For instructions on how to file, visit www.cand.uscourts.gov/cases-e-filing/.

Field Code Changed

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 www.ClearPrivacySettlement.com for a full description of the claims and persons who will be released if this settlement is approved.

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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 www.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	www.ClearPrivacySettlement.com
Settlement Administrator	CLEAR Privacy Settlement c/o Settlement Administrator 1650 Arch Street, Suite 2210 Philadelphia, PA 19103 1-855-969-4049 info@clearprivacysettlement.com [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

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