Andre M. Mura (SBN 298541)
Ezekiel S. Wald (SBN 341490)
GIBBS LAW GROUP LLP
1111 Broadway, Suite 2100
Oakland, CA 94607
Telephone: (510) 350-9700
Facsimile: (510) 350-9701
amm@classlawgroup.com
zsw@classlawgroup.com

Geoffrey A. Graber (SBN 211547)
Karina G. Puttieva (SBN 317702)
COHEN MILSTEIN SELLERS & TOLL PLLC
1100 New York Ave. NW, Fifth Floor
Washington, DC 20005
Telephone: (202) 408-4600
Facsimile: (202) 408-4699
ggraber@cohenmilstein.com
kputtieva@cohenmilstein.com

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

[CORRECTED][1] STIPULATION AND [~~PROPOSED~~] ORDER APPROVING UPDATED CLASS NOTICE

Judge: Hon. Edward M. Chen

[1] The corrected filing fixes a typo in the case number in the redlined paragraph on page 5 of the Redlined Long-Form Class Notice.

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*

Andre M. Mura (SBN 298541)
Ezekiel S. Wald (SBN 341490)
GIBBS LAW GROUP LLP
1111 Broadway, Suite 2100
Oakland, California 94607
(510) 350-9700
ehg@classlawgroup.com
amm@classlawgroup.com
zsw@classlawgroup.com
hj@classlawgroup.com

Geoffrey A. Graber (SBN 211547)
Karina G. Puttieva (SBN 317702)
COHEN MILSTEIN SELLERS & TOLL PLLC
1100 New York Ave. NW, Fifth Floor
Washington, DC 20005
Telephone: (202) 408-4600
Facsimile: (202) 408-4699
ggraber@cohenmilstein.com
kputtieva@cohenmilstein.com

Attorneys for Plaintiffs and the Certified Class

DATED: October 15, 2024

PERKINS COIE LLP

By: */s/ Hayden M. Schottlaender*

Susan D. Fahringer (SBN 21567)
Nicola C. Menaldo (*pro hac vice*)
Anna M. Thompson (*pro hac vice*)
1201 Third Avenue, Suite 4900
Seattle, WA 98101-3099
Telephone: (206) 359-8000
Facsimile: (206) 359-9000
SFahringer@perkinscoie.com
NMenaldo@perkinscoie.com
AnnaThompson@perkinscoie.com

Hayden M. Schottlaender (*pro hac vice*)
PERKINS COIE LLP
500 N. Akard Street, Suite 3300
Dallas, Texas 75201-3347
Telephone: (214) 965-7700
Facsimile: (214) 965-7799
HSchottlaender@perkinscoie.com

Gabriella Gallego (SBN 324226)
PERKINS COIE LLP
3150 Porter Drive
Palo Alto, CA 94304-1212
Telephone: (650) 838-4300
Facsimile: (650) 838-4350
GGallego@perkinscoie.com

Attorneys for Defendant
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: October 23, 2024

The Hon. Edward M. Chen
United States District Judge