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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 EXTENDING CLAIMS
PERIOD FROM DECEMBER 6, 2024
TO DECEMBER 27, 2024**

Judge: Hon. Edward M. Chen

Pursuant to Civil Local Rules 6-1, 6-2, and 7-12, the parties hereby stipulate as follows:

Whereas, the Court-appointed Settlement Administrator, Angeion Group, has been notifying the class consistent with this Court's Order Granting Preliminary Approval, which set a **December 6, 2024** deadline for class members to submit claims for monetary relief, opt-out of the settlement, or object, ECF No. 259 at 7;

Whereas, the Settlement Administrator recently completed an initial assessment of the claims submitted to date, and has concluded that additional time and work would increase the volume of claims. The Settlement Administrator recommends, and the Parties agree, to extend the December 6 deadline for class members to submit claims for monetary relief to and including **December 27, 2024**;

Whereas, any responses to objections would now be due on January 9, 2025, rather than on December 20, 2024;

Whereas, this extension **does not** require any change to the deadline to file a motion for final approval, which is January 9, 2025, or the date of the Final Fairness Hearing, which is February 13, 2025;

Whereas, the following table summarizes these proposed changes to the case schedule:

<u>Current schedule</u>	<u>Event</u>	<u>Proposed Amended Schedule</u>
December 6, 2024	Response Deadline for Class Members to Opt-Out of the Settlement or Object	No change.
December 6, 2024	Response Deadline for Class Members to Submit Claims for Monetary Relief	December 27, 2024.
December 20, 2024	Responses to Objections Due	January 9, 2025.
January 9, 2025	Deadline for Class Counsel to File Motion for Final Approval	No change.
February 13, 2025	Fairness Hearing	No change.

1 **IT IS HEREBY STIPULATED AND AGREED**, subject to the Court's approval, that the
2 case schedule shall be extended as reflected in the table above.

3 DATED: November 30, 2024

GIBBS LAW GROUP LLP

5 Respectfully submitted,

7 /s/ Andre M. Mura

8 Andre M. Mura (SBN 298541)

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1 DATED: November 30, 2024

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2 By: /s/ Susan D. Fahringer

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Attorneys for Defendant
Thomson Reuters Corporation

[PROPOSED] ORDER

PURSUANT TO STIPULATION AND FOR GOOD CAUSE, IT IS SO ORDERED.

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