

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, Suite 800
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

**STIPULATION AND [PROPOSED]
ORDER APPROVING
DISBURSEMENT OF SETTLEMENT
ADMINISTRATION EXPENSES**

Judge: Hon. Edward M. Chen

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

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

4 Whereas, the Court-appointed Settlement Administrator, Angeion Group, has been
5 notifying the class consistent with this Court's order;

6 Whereas, pursuant to the Parties' settlement agreement and the Court's Order granting
7 preliminary approval thereof, the Settlement Administrator will be provided payment out of
8 the Qualified Settlement Fund;

9 Whereas, Angeion Group has incurred \$276,667.10 in settlement administration costs as
10 of October 31, 2024, as detailed in the attached declaration of Jonathan Shaffer; and

11 Whereas, Class Counsel has reviewed Angeion Group's invoices setting out the
12 \$276,667.10 in settlement administration costs incurred through October 31, 2024 and
13 determined that they are consistent with the cost estimates that the Settlement Administrator
14 provided to the parties and the Court;

15 **IT IS HEREBY STIPULATED AND AGREED**, subject to the Court's approval, that
16 \$276,667.10 may be disbursed out of the Qualified Settlement Fund to reimburse Angeion
17 Group for the reasonable settlement administration costs to date.

1 DATED: December 9, 2024

GIBBS LAW GROUP LLP

2
3 Respectfully submitted,

4
5 /s/ Andre M. Mura

6 Andre M. Mura (SBN 298541)

7 Ezekiel S. Wald (SBN 341490)

8 GIBBS LAW GROUP LLP

9 1111 Broadway, Suite 2100

Oakland, California 94607

(510) 350-9700

10 amm@classlawgroup.com

11 zsw@classlawgroup.com

12 Geoffrey A. Graber (SBN 211547)

13 Karina G. Puttieva (SBN 317702)

COHEN MILSTEIN SELLERS & TOLL PLLC

14 1100 New York Ave. NW, Suite 800

Washington, DC 20005

15 Telephone: (202) 408-4600

16 Facsimile: (202) 408-4699

ggraber@cohenmilstein.com

17 kputtieva@cohenmilstein.com

18 *Attorneys for Plaintiffs and the Certified Class*

1 DATED: December 9, 2024

PERKINS COIE LLP

2 By: /s/ Susan D. Fahringer

3
4 Susan D. Fahringer (SBN 21567)
5 Nicola C. Menaldo (*pro hac vice*)
6 Anna M. Thompson (*pro hac vice*)
7 1201 Third Avenue, Suite 4900
8 Seattle, WA 98101-3099
9 Telephone: (206) 359-8000
10 Facsimile: (206) 359-9000
11 SFahringer@perkinscoie.com
12 NMenaldo@perkinscoie.com
13 AnnaThompson@perkinscoie.com

14
15 Hayden M. Schottlaender (*pro hac vice*)
16 PERKINS COIE LLP
17 500 N. Akard Street, Suite 3300
18 Dallas, Texas 75201-3347
19 Telephone: (214) 965-7700
20 Facsimile: (214) 965-7799
21 HSchottlaender@perkinscoie.com

22
23 Gabriella Gallego (SBN 324226)
24 PERKINS COIE LLP
25 3150 Porter Drive
26 Palo Alto, CA 94304-1212
27 Telephone: (650) 838-4300
28 Facsimile: (650) 838-4350
GGallego@perkinscoie.com

Attorneys for Defendant
Thomson Reuters Corporation

[PROPOSED] ORDER

PURSUANT TO STIPULATION, \$276,667.10 may be disbursed out of the Qualified Settlement Fund to reimburse Angeion Group for the reasonable settlement administration costs to date.

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