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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

**NOTICE WITHDRAWING STIPULATION
(ECF NO. 269) PURSUANT TO CIVIL
LOCAL RULE 7-7(e)**

Judge: Hon. Edward M. Chen

1 PLEASE TAKE NOTICE that, pursuant to Civil Local Rule 7-7(e) the parties are
2 withdrawing their stipulation, ECF No. 269, without prejudice to seeking such relief at final
3 approval.

4 The parties had asked for permission to reimburse the settlement administrator,
5 Angeion Group, for certain settlement administration costs it has incurred as of October 31,
6 2024, per Angeion's request. ECF No. 269. Some courts allow settlement administrators to seek
7 reimbursement of costs incurred before final approval; some do not. *Compare In re Apple Inc.*
8 *Sec. Litig.*, No. 4:19-CV-02033-YGR, 2024 WL 3297079, at *14 (N.D. Cal. June 3, 2024) (yes); *In re*
9 *SunPower Sec. Litig.*, No. CV 09-5473-RS, 2013 WL 12177079, at *5 (N.D. Cal. Mar. 25, 2013) (yes),
10 *with Mandalevy v. Bofl Holding, Inc.*, No. 3:17-CV-667-GPC-MSB, 2022 WL 1556160, at *10-11
11 (S.D. Cal. May 17, 2022) (no). Given that the final approval motion is due in fewer than thirty
12 days, it seems unnecessary to press for an answer to this timing question if the answer is less
13 than clear.

14 Accordingly, the parties respectfully withdraw their request and will resubmit it on
15 January 9 with their final approval motion.

1 DATED: December 11, 2024

GIBBS LAW GROUP LLP

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3 Respectfully submitted,

4 /s/ Andre M. Mura

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1 DATED: December 11, 2024

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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