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Attorneys for Plaintiffs and the Class

UNITED STATES DISTRICT COURT
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

DECLARATION OF STEVEN WEISBROT OF ANGEION GROUP RE: IMPLEMENTATION OF THE NOTICE PLAN & SETTLEMENT ADMINISTRATION

REDACTED - PUBLICLY FILED VERSION

I, Steven Weisbrot, declare and state as follows:

1. I am the President and Chief Executive Officer at the class action notice and claims administration firm Angeion Group, LLC ("Angeion"). Angeion specializes in designing, developing, analyzing, and implementing large-scale, un-biased, legal notification plans.

2. I have personal knowledge of the matters stated herein. In forming my opinions regarding notice in this action, I have drawn from my extensive class action experience, as described in the Declaration of Steven Weisbrot of Angeion Group re: Settlement Administration Protocol and Proposed Notice Plan ("Notice Plan Declaration") (Dkt. No. 241-2).

3. Angeion was appointed as Settlement Administrator and directed to carry out the Notice Plan in conformance with the Class Action Settlement Agreement (Dkt. No. 241-1) ("Agreement"), and to perform all other tasks required by the Agreement. *See* Order Granting Preliminary Approval of Class Action Settlement (Dkt. No. 259) ("Preliminary Approval Order").

4. The purpose of this declaration is to provide the Parties and the Court with a summary of the work performed to implement the Court-approved Notice Plan, and to provide an update regarding the number and status of Claim Forms received, requests for exclusion received, and objections to the Settlement.

NOTICE PURSUANT TO THE CLASS ACTION FAIRNESS ACT OF 2005

5. The Agreement was filed with the Court on August 29, 2024. Accordingly, pursuant to 28 U.S.C. §§ 1715(b), Angeion caused notice of the Settlement ("CAFA Notice") to be sent to the Attorneys General of all U.S. states and territories, and the Attorney General of the United States on September 6, 2024. A true and accurate copy of the CAFA Notice is attached hereto as **Exhibit A**.

SUMMARY OF THE NOTICE PLAN

6. The Notice Plan provided for a comprehensive multi-faceted media campaign consisting of state-of-the-art internet notice, social media notice via Facebook and Instagram, and a paid search campaign via Google. The Notice Plan also included print publication in *USA Today*'s California regional publication and the implementation of a dedicated Settlement Website and toll-

free telephone line where Settlement Class Members were able to learn more about their rights and options pursuant to the terms of the Settlement.

7. The robust media campaign was designed to deliver an approximate 75.30% reach with an average frequency of 3.09 times each by serving over sixty-eight (68) million impressions. What this means in practice is that 75.30% of our Target Audience will see an advertisement concerning the settlement an average of 3.09 times each.

MEDIA CAMPAIGN

Banner Ads

8. On October 18, 2024, Angeion commenced disseminating the internet banner notices using a desktop and mobile ad campaign to notify and drive Settlement Class Members to the dedicated Settlement Website where they could find more information about the Settlement and submit a claim form. The internet banner ads ran for 28 days and served approximately 51,555,443 impressions. True and correct copies of the internet banner ads are attached hereto as **Exhibit B**.

Social Media Ads

9. On October 18, 2024, Angeion commenced the social media campaign utilizing the social media platforms Facebook and Instagram to notify and drive Settlement Class Members to the dedicated Settlement Website. The social media ads ran concurrently with the internet banner notices and served approximately 22,362,140 impressions. True and correct copies of the social media ads are attached hereto as **Exhibit C**.

Paid Search

10. On October 18, 2024, Angeion commenced the paid search campaign via Google to help drive Settlement Class Members who were actively searching for information about the Settlement to the dedicated Settlement Website. The paid search has served approximately 3,900 impressions.

Reach & Frequency

11. The media plan **exceeded expectations** by serving over seventy-three (73) million impressions, resulting in an approximate 78.95% reach with an average frequency of 3.20 times each.

In practice, this means that approximately 78.95% of our Target Audience saw an advertisement concerning the Settlement an average of 3.20 times each. The approximate 78.95% reach is separate and apart from the Settlement Website and toll-free hotline.

12. The Federal Judicial Center states that a publication notice plan that reaches 70% of class members is one that reaches a "high percentage" and is within the "norm." Barbara J. Rothstein & Thomas E. Willging, Federal Judicial Center, "Managing Class Action Litigation: A Pocket Guide for Judges", at 27 (3d Ed. 2010).

13. In my professional opinion, this Notice Plan, as implemented, provided full and proper notice to Settlement Class Members and is the best practicable notice under the circumstances, fulfilling all due process requirements, fully comporting with Fed. R. Civ. P. 23, and the Northern District's Procedural Guidance for Class Action Settlements.

PRINT PUBLICATION

14. Angeion caused notice of the Settlement to be published in the California regional edition of *USA Today* on October 18, 2024, October 25, 2024, November 1, 2024, November 8, 2024 and November 15, 2024. The circulation for the California regional edition of *USA Today* is approximately 15,938. True and correct copies of the *USA Today* publications are attached hereto as **Exhibit D.**

SETTLEMENT WEBSITE

15. On October 18, 2024, Angeion established the following website devoted to this Settlement: www.ClearPrivacySettlement.com ("Settlement Website"). The Settlement Website contains general information about this Settlement, including important dates and deadlines, and answers to frequently asked questions. The Settlement Website also has a "Contact Us" page whereby Settlement Class Members can send a message with any additional questions to a dedicated email address. Settlement Class Members were also able to submit a Claim Form or Exclusion request via customized secure online portals.

16. The Settlement Website allowed Settlement Class Members to review or download

relevant Court documents, including the Detailed Notice[1], Claim Form[2], Request for Exclusion Form[2], Preliminary Approval Order, operative Complaint filed in this Action, and Plaintiffs' Motion for Attorneys' Fees. True and accurate copies of the Detailed Notice, Claim Form, and Request for Exclusion Form are attached hereto as **Exhibits E, F, and G**, respectively.

17. As of December 27, 2024, the Settlement Website has had approximately 5,013,529 page views and 3,862,101 sessions, which represents the number of individual sessions initiated by all users.

TOLL-FREE PHONE NUMBER

18. On October 18, 2024, Angeion established the following toll-free line dedicated to this case: 1-855-969-4049. The toll-free line utilizes an interactive voice response ("IVR") system to provide Settlement Class Members with responses to frequently asked questions, the ability to request that a Detailed Notice or Claim Form be mailed to them, and includes general information about the Settlement including important dates and deadlines. The toll-free line is accessible 24 hours a day, 7 days a week.

19. As of December 27, 2024, there have been 156 calls to the toll-free telephone number representing approximately 611 minutes of use.

CLASS MEMBER COMMUNICATION

Email Correspondence

20. On October 18, 2024, Angeion established the following email address dedicated to this case: info@ClearPrivacySettlement.com. In addition to the frequently asked questions available on the Settlement Website and toll-free IVR telephone support, Settlement Class Members could send emails directly to the Settlement Administrator.

21. As of January 6, 2025, there have been approximately 6,125 emails received from potential members of the Settlement Class. Where appropriate, Angeion has responded to these, and will continue to receive and respond to inquiries throughout the remainder of the administration.

[1] Available in English, Spanish and Simplified Chinese.
[2] Available in English and Spanish.

Mail Correspondence

22. On October 18, 2024, Angeion established the following mailing address for this case: CLEAR Privacy Settlement Administrator, 1650 Arch Street, Suite 2210, Philadelphia, PA 19103.

23. As of January 6, 2025, there have been approximately 1,082 pieces of mail received to the mailing address by potential members of the Settlement Class consisting of general correspondence and inquiries, Claim Forms, and Exclusion Forms.

ADDITIONAL CLAIMS STIMULATION EFFORTS

24. As reported in the Declaration of Steven Weisbrot of Angeion Group re: Status of Claims Filing ("Status of Claims Filing Declaration") (Dkt. No 271-1), Angeion worked closely with Class Counsel and has undertaken numerous efforts to stimulate claims, summarized below.

Sponsored Class Action Website Listing

25. On or about November 25, 2024, Angeion caused a sponsored listing to be posted on a leading class action settlement website, www.topclassactions.com. Angeion also caused the Settlement to be featured in two email newsletters distributed by Top Class Actions (November 29, 2024 and December 3, 2024). True and correct copies of the Top Class Actions listing and email newsletters are attached hereto as **Exhibit H.**

Social Media Ads

26. On December 3, 2024, Angeion implemented additional social media notice via the social media platforms Facebook, Instagram, and X. The social media notices served approximately 2,597,734 impressions. The notices were specifically crafted utilizing simplified messaging and stressed the impending claim filing deadline. Exemplar copies of the social media notices are attached hereto as **Exhibit I**.

27. On December 23, 2024, video advertisements were incorporated into the Facebook social media campaign. As of December 27, 2024, these videos have been viewed approximately 53,544 times on the Facebook platform.

Paid Search Campaign

28. On or about December 3, 2024, Angeion commenced an additional paid search campaign via Google. The paid search campaign complemented the social media claims stimulation efforts by driving Settlement Class Members who were actively searching for information about the Settlement to the dedicated Settlement Website. The paid search campaign served approximately 11,189 impressions.

Press Release

29. On December 9, 2024, Angeion caused a press release announcing the Settlement and the updated claims filing deadline to be distributed over PR Newswire. As of January 6, 2025, the release was posted by approximately 511 media outlets with a total combined potential audience of 161.6 million visitors. A true and correct copy of the Press Release is attached hereto as **Exhibit J.**

Legal Influencer

30. On December 9, 2024, Angeion caused a social media video advertisement to be distributed by The Lawyer Angela, a social media legal influencer, via TikTok and Instagram, to further stimulate claims. As of January 5, 2025, the social media video advertisement has received approximately 1,041,716 combined views across these platforms. A true and correct copy of the text used in the social media video advertisement is attached hereto as **Exhibit K**.

YouTube

31. On December 23, 2024, Angeion commenced a YouTube video advertisement campaign which targeted potential Settlement Class Members to notify and drive them to the dedicated Settlement Website where they could find more information about the Settlement, including their rights and options, and associated deadline date. The YouTube video advertisements have served approximately 383,143 impressions. True and correct copies of the text used for the YouTube advertisements are attached hereto as **Exhibit L**.

Summary of Additional Claims Stimulation Efforts

32. As stated in the Status of Claims Filing Declaration, the additional claim stimulation efforts described herein exceeded customary notice efforts deployed in similar matters. These efforts leveraged the latest contemporary media realities, allocating additional efforts in the areas that had

previously proven successful, and focused on all aspects of the traditional marketing funnel, from awareness through conversion. In summary, the integrated media campaign exceeded the notice program approved by this Court.

33. Inclusive of the additional Claim Stimulation efforts, the combined media notice plan served over seventy-six (76) million impressions, resulting in an approximate 81.25% reach with an average frequency of 3.24 times each. The approximate 81.25% reach does not include the Sponsored Class Action Website listing, Legal Influencer posting, Press Release, Settlement Website and toll-free hotline, which are difficult to measure in reach, but nevertheless serve an instrumental role in providing additional notice of the Settlement to potential Settlement Class Members.

CLAIMS FILING & FRAUD DETECTION

34. Angeion analyzed the claim submissions for validation and fraud detection. On or about November 15, 2024, Angeion identified a significant volume of claims filing attempts on the Settlement Website that appeared to overwhelmingly emanate from bad actors posing as legitimate claimants. Angeion investigated those filings, and after review, believes these claims primarily were filed via bots or originated from other fraudulent claims filing mechanisms that were recognizable to Angeion. Importantly, a significant number of these claim submission attempts were identified and prevented via Angeion's fraud detection system, AngeionAffirm (described in greater detail in the Notice Plan, Dkt. No. 241-2).

35. As reported in my Status of Claims Filing Declaration, on December 13, 2024, after discussing with counsel, Angeion implemented a requirement for all payment methods to verify their selection via SMS (short message service) (*i.e*. text message via one-time password ("OTP")), rather than offering the option of email verification *or* SMS. This change was intentionally designed to verify that the claims filed were submitted by a human, rather than by a bot (in an attempt to commit fraud). On December 19, 2024, the settings were updated on the SMS to further dissuade fraudulent claims by limiting the number of times the same phone number may be utilized in the OTP process. As described above, Angeion identified a large volume of bad actors posing as legitimate claim filers, and implemented these changes in the ongoing efforts to identify and prevent fraudulent submissions.

36. [redacted]

37. [redacted]

38. [redacted]

39. [redacted]



40. On December 26, 2024, Class Counsel forwarded an email from a Class Member experiencing difficulty submitting a claim. We promptly responded to this individual to assist with submitting their claim, and were able to successfully process the claim.

41. While fraud review is ongoing for certain claims, the following table reflects the status of claims as of January 8, 2025.

Approximate Claims received	752,034 (750,439 electronic, 1,595 paper)
Approximate Claims preliminarily approved	134,325
Approximate Claims pending validation and fraud review	46,493
Approximate Claims determined to be duplicative or fraudulent	571,216
Claims blocked as submitted by software applications (bots)	22.9 million
Opt outs received by the deadline	50 (49 electronic, 1 paper)
Opt outs received after the deadline	0
Objections received by the deadline	0
Objections received after the deadline	0

42. Utilizing only the 134,325 preliminarily approved claims thus far yields a claims rate of approximately 0.336% and an estimated per-claimant recovery of $144.20 for each participating claimant.

43. Angeion is continuing its multifaceted review of the 46,493 claims noted as "pending validation" in the chart above so as to ensure they were submitted by legitimate claimants.

REQUESTS FOR EXCLUSION

44. The deadline for Settlement Class Members to request exclusion from the Settlement was December 6, 2024. As of January 6, 2025, Angeion has received fifty (50) timely requests for exclusion and zero late requests for exclusion from the Settlement. A list containing the names of the individuals who have requested exclusion from the Settlement is attached hereto as **Exhibit M**.

OBJECTIONS TO THE SETTLEMENT

45. The deadline for Settlement Class Members to object to the Settlement was December 6, 2024. As of January 6, 2025, Angeion has not received, nor been made aware of any Objections to the Settlement.

NOTICE & ADMINISTRATION COSTS

46. Through December 31, 2024, the cost to provide notice to the Settlement Class and perform the administrative tasks required under the Settlement is approximately $472,565.70. The chart below illustrates the costs broken down by category:

Description	Amount
Costs to Implement Notice, Including CAFA Notice	$ 302,943.00
Claims Processing and Opt Out, Objection & Class Member Related Processing	$ 117,992.60
Settlement Website & Call Center	$ 12,708.00
Case and Document Management, Project Management and Reporting	$ 38,922.10
Total	**$ 472,565.70**

47. Angeion estimates the total costs for disseminating class notice, along with claims processing and distribution through completion, will be approximately $545,000.

CONCLUSION

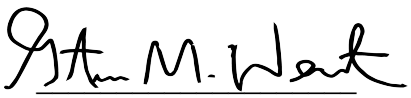
48. The Notice Plan provided for a robust and diverse media campaign consisting of state-of-the-art targeted internet notice, social media notice, and a paid search campaign, and the implementation of a dedicated Settlement Website, and toll-free telephone line where Class Members

could learn more about their rights and options pursuant to the terms of the Settlement. Additionally, the comprehensive Claims Stimulation campaign further disseminated notice of the Settlement.

49. It remains my professional opinion that the Notice Plan and additional notice efforts implemented in this Settlement provided full and proper notice to Settlement Class Members before the claims, opt-out, and objection deadlines. Moreover, it is my opinion that the Notice Plan was the best notice practicable under the circumstances, fully comporting with due process and Fed. R. Civ. P. 23, and the Northern District's Procedural Guidance for Class Action Settlements.

I hereby declare under penalty of perjury that the foregoing is true and correct.

Dated: January 9, 2025.



STEVEN WEISBROT

Exhibit A

ANGEION GROUP
Writing the Rules

1650 Arch Street, Suite 2210
Philadelphia, PA 19103
www.angeiongroup.com
215.563.4116 (P)
215.525.0209 (F)

September 6, 2024

VIA USPS PRIORITY MAIL

United States Attorney General &
Appropriate Officials

Re: Notice of Class Action Settlement
Brooks et al v. Thomson Reuters Corporation

Dear Counsel or Official:

Angeion Group, an independent claims administrator, on behalf of the defendant in the below-described action, hereby provides your office with this notice under the provisions of the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715, to advise you of the following proposed class action settlement:

Case Name: Brooks et al v. Thomson Reuters Corporation
Index Number: 3:21-cv-01418-EMC-KAW
Jurisdiction: United States District Court for the Northern District of California, San Francisco Division
Date Settlement Filed with Court: August 29, 2024

In accordance with the requirements of 28 U.S.C. § 1715, copies of the following documents associated with this action are available at https://www.angeiongroup.com/cafa/.

1. **28 U.S.C. § 1715(b)(1)-Complaint:** *Class Action Complaint* filed with the Court on December 03, 2020**.** *First Amended Class Action Complaint* filed with the Court on November 14, 2022 and *First Amended Class Action Complaint* filed with the Court on December 02, 2022.

2. **28 U.S.C. § 1715(b)(2)-Notice of Any Scheduled Judicial Hearings:** *Plaintiffs' Notice of Motion and Motion for Preliminary Approval of Class Action Settlement; Memorandum of Points and Authorities in Support Thereof* sets the hearing on Plaintiffs' Motion for Preliminary Approval for October 3, 2024, at 1:30 p.m. PT, in the San Francisco Courthouse, Courtroom 5 – 17th Floor, 450 Golden Gate Ave., San Francisco, CA 94102.

3. **28 U.S.C. § 1715(b)(3)-Notification to Class Members:** The *Class Notice*, *Claim Form* and *Exclusion Form* filed with the Court on August 29, 2024.

4. **28 U.S.C. § 1715(b)(4)-Class Action Settlement Agreement:** *Class Action Settlement Agreement*, filed with the Court on August 29, 2024. *Plaintiffs' Notice of Motion and Motion for Preliminary Approval of Class Action Settlement; Memorandum of Points and Authorities in Support Thereof* filed with the Court on August

29, 2024, and the *Declaration of Andre Mura and Geoffrey Graber in Support Of Plaintiffs Motion for Preliminary Approval of Class Settlement, Declaration of Cat Brooks in Support of Plaintiffs Motion For Preliminary Approval Of Class Settlement, Declaration of Layn R Phillips in Support of Preliminary Approval of Class Settlement, Declaration of Rasheed Shabazz in Support of Plaintiffs Motion for Preliminary Approval of Class Settlement,* and the *Proposed Order Granting Preliminary Approval of Class Action Settlement,* filed with the Court on August 29, 2024, are also available at https://www.angeiongroup.com/cafa/.

5. **28 U.S.C. § 1715(b)(5)-Any Settlement or Other Agreements:** Other than the Settlement Agreement, no other settlements or other agreements have been contemporaneously made between the Parties.

6. **28 U.S.C. § 1715(b)(6)-Final Judgment:** The Court has not issued a Final Judgment or notice of dismissal as of the date of this CAFA Notice.

7. **28 U.S.C. § 1715(b)(7)(B)-Estimate of Class Members:** The Settlement Class includes approximately forty million individuals located within the State of California and potentially throughout the United States. The estimated proportional share of the Settlement benefits is not available at this time, as it is contingent on the Class Member submission of a claim form.

8. **28 U.S.C. §1715(b)(8)-Judicial Opinions Related to the Settlement:** The Court has not issued a judicial opinion related to the Settlement at this time.

If you have questions or concerns about this notice, the proposed settlement, or difficulty accessing the associated documents, please contact this office.

Sincerely,

Angeion Group
1650 Arch Street, Suite 2210
Philadelphia, PA 19103
(p) 215-563-4116
(f) 215-563-8839

Exhibit B

If you resided in **California** for any period of time between December 3, 2016 and October 31, 2024, you may be entitled to a **payment** from a **$27.5 million** class action settlement.

Click here for more information

If you resided in **California** for any period of time between December 3, 2016 and October 31, 2024, you may be entitled to a **payment** from a **$27.5 million** class action settlement.

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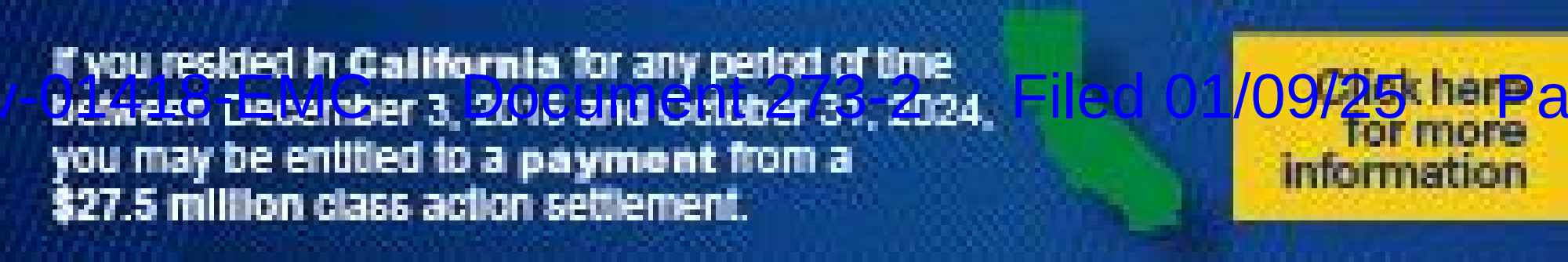
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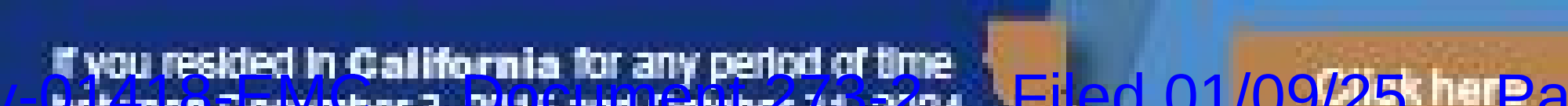
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4:24-cv-01418-EMC Document 273-2 Filed 01/09/25 Page

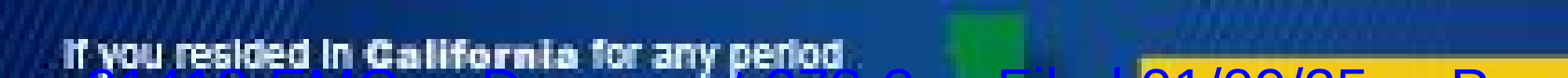
If you resided in California for any period of time between December 3, 2016 and October 31, 2024, you may be entitled to a payment from a $27.5 million class action settlement.

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4:23-cv-01418-EMC Document 273-2 Filed 01/09/25 Page

If you resided in California for any period of time between December 3, 2016 and October 31, 2024, you may be entitled to a payment from a $27.5 million class action settlement.

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If you resided in California for any period
October 31, 2024, you may be entitled to a
payment from a $27.5 million class action settlement.
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more information



-cv-01418-EMC Document 273-2 Filed 01/09/25 Page

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Exhibit C

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If you lived in California anytime since December 3, 2016, you may be entitled to a payment from a $27.5 million settlement.



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Thomson Reuters CLEAR Settlement
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Learn more

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Thomson Reuters CLEAR Settlement
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Exhibit D

United States District Court
Brooks v. Thomson Reuters Corp.
Case No. 3:21-cv-01418

Class Action Notice

Authorized by the U.S. District Court

This is an important notice about a class action lawsuit. 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 may be a member of the group of people affected**, called the "class", and **you may be entitled to money as part of the $27.5 million settlement**. If you are a class member, this notice tells you how to get more information about the settlement.

Did you live in California anytime since December 3, 2016? If yes, you may be a class member.

Your options as a class member:	More about each option:
Submit a Claim Form	File a claim form to get payment from the settlement.
Opt Out	Submit an opt out form. Get no payment, keep the right to sue Thomson Reuters about the same issues.
Do Nothing	Get no payment. Give up rights resolved by settlement.
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.

If you want to file a claim, you must do so by December 6, 2024.

You can file a claim, opt out, or learn more at: www.ClearPrivacySettlement.com, or scan the QR code.

Key things to know:

- This is an important legal document.
- If you are a class member and you take no action, you will still be bound by the settlement and your rights will be affected.
- If you have questions or need assistance, please call 1-855-969-4049.

Ride-hailing drivers unite for change

Group's network seeks to improve pay, safety

Tatiana Walk-Morris
Capital & Main



Rideshare drivers rally at a staging area near O'Hare International Airport during a work strike on Feb. 14 in Chicago. The demonstration was staged by Uber, Lyft and DoorDash drivers. SCOTT OLSON/GETTY IMAGES

On a muggy June morning, a handful of rides-hailing drivers descended on Chicago's O'Hare International Airport with stacks of red, white and blue leaflets, limp in the heat, that demanded to "end unfair deactivations." A similar scene unfolded at Denver International Airport and Uber's Greenlight Hub in San Jose, California. Together, drivers in three states launched Activate Respect, a national campaign against driver deactivations – what workers refer to as being "fired by an app."

The three-city action also marked an addition to the growing national movement to make ride-hailing jobs good jobs. "It's potentially very powerful for drivers to connect across cities," said Mariah Montgomery, national campaigns director at PowerSwitch Action, an Oakland, California-based advocacy group. That connection, she said, lets workers "learn from both the wins and the losses people have experienced to apply that information in more places."

While local campaigns have dominated efforts to improve the jobs of drivers at ride-hailing companies such as Lyft and Uber, Activate Respect is part of an emerging trend to coordinate driver demands in different places. Organized by PowerSwitch Action, the campaign against companies stripping drivers of access to their work accounts builds on multiple local efforts to improve ride-hailing jobs – some successful, some not, but all bearing sharing enough common ground that building a national effort seemed a logical step. "We can kind of see what's happening across places and say to somebody that we're hearing, you know, the same thing in two different places, and maybe you should talk," Montgomery said.

The first inklings for PowerSwitch came in 2021 when the group discussed drivers' problems with the Action Center on Race and the Economy (ACRE) and other groups. In 2023, PowerSwitch Action, ACRE and Gig Workers Rising released a national report about ride-hailing drivers who have died on the job. They also organized a National Day of Action to educate the public about drivers' safety concerns. Activate Respect goes a step further, Montgomery said, by making the same, specific demand – transparency and accountability around deactivations – in different places.

Activists hope that the campaign can build on recent local successes.

In 2024, Minnesota and Colorado passed important ride-hailing legislation. In May, Minnesota Gov. Tim Walz, who is also the Democratic candidate for vice president, signed a bill establishing a minimum pay rate for rideshare drivers. The law followed a nearly two-year effort by the Minnesota Uber/Lyft Drivers Association that made national headlines. In June, Colorado legislators passed a law requiring companies to publicly disclose fares, driver wages, and deactivation policies after a campaign by Colorado Independent Drivers United.

In an emailed statement to Capital & Main, Uber said the Minnesota law "represents a new way officials are looking at the gig economy: a focus on benefits and protections, rather than on employment classification."

Uber said that in Colorado, "We appreciate that Colorado Independent Drivers United was willing to make such significant compromises" but that the law will "have unintended consequences for both drivers and riders." The company statement did not specify what those consequences might be.

In Washington state, ride-hailing drivers working with the Teamsters Local 117-affiliated Drivers Union won groundbreaking protections in both 2023 and 2024. In 2023, drivers successfully lobbied lawmakers for the passage of a new pay standard, paid sick leave and workers' compensation in the state of Washington. This year, they also won death benefits under workers' compensation coverage – which they claim as a first in the nation. Washington drivers can also now file complaints against rideshare companies and appeal deactivations, and the protections are enforced by the Washington State Department of Labor and Industries.

An Uber spokesperson expressed the company's support for drivers maintaining their independent contractor status while receiving additional protections. The statement praised the "hard work and a commitment from all parties to stay at the negotiating table" and said the legislation could be a model for "cities, states and countries around the world."

Uber and Lyft have fought local efforts to establish protections. In California, for example, gig workers, including rideshare drivers, collaborated with groups such as California Gig Workers Union, Gig Workers Rising, Service Employees International Union Local 721 and SEIU Local 1021 to win worker protections under AB5, a law that took effect in January 2020 and reclassified some contractors as employees – and made the companies that employed drivers responsible for their working conditions. Uber and Lyft worked with DoorDash, Instacart and Postmates to successfully cancel it out that November by pushing Proposition 22, an initiative approved by state voters that allowed the companies to continue classifying ride-hailing workers as independent contractors. Drivers in New York City, meanwhile, won significant protections last year, but they continue to battle new strategies that companies are using to reduce payments to drivers.

Uber said that it has invested more than $1 billion into Prop 22 benefits for California drivers and couriers as of April 2024 but offered no further comment on its stance on the law.

Over time, Montgomery said, it became clear that rideshare companies had developed a playbook for fighting worker protections – and for responding to threats of regulation. For example, Uber and Lyft have suspended operations or threatened to leave areas where regulation is likely to expand, including cities such as Austin, Texas; Chicago; and Minneapolis and states such as California and Arizona.

Cross-city organizing among ride-hailing drivers is difficult because they are so physically isolated from one another, said Katie Wells, a postdoctoral Fritz Fellow with Georgetown University's new Tech & Society initiative and co-author of "Disrupting D.C.: The Rise of Uber and the Fall of the City." Without a physical central hub – think the taxi garages once commonplace in big cities – ride-hailing drivers do not encounter each other in passing. "The fact that some folks are coming together to organize – it's really impressive," Wells said.

"One reason why it's so important is because we don't have regulators standing up to these companies, and so we have no other choice. All these groups have to come together to say that Silicon Valley isn't going to get to have its way," Wells said.

Chicago drivers work across state lines

Chicago drivers offer a prime example of collaboration across state lines. Working with The People's Lobby and the local chapter of the Gig Alliance, Chicago ride-hailing drivers have been pushing for the Chicago Rideshare Living Wage and Safety Ordinance since 2022. The proposed citywide law would raise driver pay, cap corporate profit from each passenger fare and standardize notice for deactivations, among other protections. But they are not going it alone.

Over the past few years, PowerSwitch Action had been working informally to connect ride-hailing drivers across multiple cities and states, said Jeff Barrera, communications director at PowerSwitch Action. But its cross-city collaboration took shape last fall, said J.C. Muhammad, a part-time ride-hailing driver and full-time organizer with The People's Lobby.

That collaboration began last fall when California drivers with Gig Workers Rising flew to Chicago to meet their peers. The chilly trip was the first time Jose Gazo, a San Francisco-based driver, had visited the city, which was exciting. Before an official meeting, Gazo helped call local drivers to invite them to a meeting, highlighting that he had come out to hear what his peers were experiencing in the industry.

The cross-country group also spent several hours canvassing other drivers at O'Hare airport, asking them to write letters supporting the Chicago ride-hailing ordinance and to join the upcoming deactivation campaign, said Lori Simmons, gig worker organizer with the People's Lobby in Chicago.

As the drivers spoke about their work, they realized how much they had in common – especially a drop in pay.

"All of us have different efforts going on in different cities to address pay," said Muhammad, the Chicago driver who participated in the meeting with California drivers. Another Chicago driver who volunteers for the Chicago Gig Alliance, Joe Negrau, had been keeping a spreadsheet to track his wages from 2021 to 2023. He said he earned $2.70 per mile from Uber in 2021 before expenses – but only $1.55 per mile in 2023. A 2023 City of Chicago pay study found that nearly two-thirds (65.3%) of full-time ride-hailing drivers earned $31 and $40 on average per hour spent driving passengers, which dropped down to between $18.90 and $27.90 after expenses.

It was similar in California. There, a California Gig Workers Union survey of 658 Southern California drivers conducted between March and April 2022 found that 85% of respondents said rising gas prices had reduced their earnings "by a lot." A high percentage of respondents also reported struggling to afford living expenses such as housing (82%), utilities (60%), food (59%) and medical expenses (23%).

In their conversations, the drivers realized that low pay wasn't the only problem they shared. With a worrisome series of customer attacks on drivers, safety was also a concern. Unexpected deactivations without recourse were a problem, too.

"The next biggest thing that we needed to tackle on a national scale is deactivations," Muhammad said.

In March, Chicago ride-hailing drivers flew out to San Jose to meet with the Gig Workers Alliance and Colorado Independent Drivers United to plan for the coming year, Simmons said. That month, they landed on unfair deactivations as their initial target, and the Activate Respect campaign was born.

In the months since, the cross-city meetups have continued, Simmons said.

In response to Capital & Main's questions regarding various ride-hailing and gig work laws emerging across multiple states, a Lyft spokesperson said, "What we've seen over the past several years is a shift in the public dialog away from should drivers be employees to figuring out the best way to design protections and benefits that make sense in the context of ride-hailing. That's why you've seen efforts to negotiate compromises in places like Washington, Minnesota and Colorado, where the companies, labor leaders, drivers and elected officials attempted to work together to find common ground."

The Lyft spokesperson continued, "Not all these solutions have been perfect, but what they have shown is that we can begin to improve the driver experience on the platform without sacrificing the flexibility and independence that draws people to this type of work in the first place."

This article was produced by the nonprofit journalism publication Capital & Main and is co-published here with permission.

LEGAL NOTICE

United States District Court
Brooks v. Thomson Reuters Corp.
Case No. 3:21-cv-01418

Class Action Notice

Authorized by the U.S. District Court

This is an important notice about a class action lawsuit. 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 may be a member of the group of people affected**, called the "class", and **you may be entitled to money as part of the $27.5 million settlement**. If you are a class member, this notice tells you how to get more information about the settlement.

Did you live in California anytime since December 3, 2016? If yes, you may be a class member.

Your options as a class member:	More about each option:
Submit a Claim Form	File a claim form to get payment from the settlement.
Opt Out	Submit an opt out form. Get no payment, keep the right to sue Thomson Reuters about the same issues.
Do Nothing	Get no payment. Give up rights resolved by settlement.
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.

If you want to file a claim, you must do so by December 6, 2024.

You can file a claim, opt out, or learn more at: www.ClearPrivacySettlement.com, or scan the QR code.

Key things to know:

- This is an important legal document.
- If you are a class member and you take no action, you will still be bound by the settlement and your rights will be affected.
- If you have questions or need assistance, please call 1-855-969-4049.

Exhibit E

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 31, 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 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.

Table of Contents

About This Notice **3**
Why did I get this notice? 3
What do I do next? 3
What are the most important dates? 4
Learning About the Lawsuit **4**
What is this lawsuit about? 4
Why is there a settlement in this lawsuit? 4
What happens next in this lawsuit? 5
Learning About the Settlement **5**
What does the settlement provide? 6
How do I know if I am part of this settlement? 6
How much will my payment be? 7
Deciding What to Do **7**
How do I weigh my options? 7
Submitting a Claim **9**
How do I get a payment if I am a class member? 9
Do I have a lawyer in this lawsuit? 9
Do I have to pay the lawyers in this lawsuit? 10
Opting Out **10**
What if I don't want to be part of this settlement? 10
How do I opt out? 11
Objecting **11**
What if I disagree with the settlement? 11
Doing Nothing **12**
What are the consequences of doing nothing? 12
Key Resources **12**
How do I get more information? 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: **December 6, 2024**
Your deadline to object or opt out: **December 6, 2024**
Settlement approval hearing: **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.

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

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 3:21-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.

Why is there a settlement in this lawsuit?

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 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: 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.

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 31, 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**.

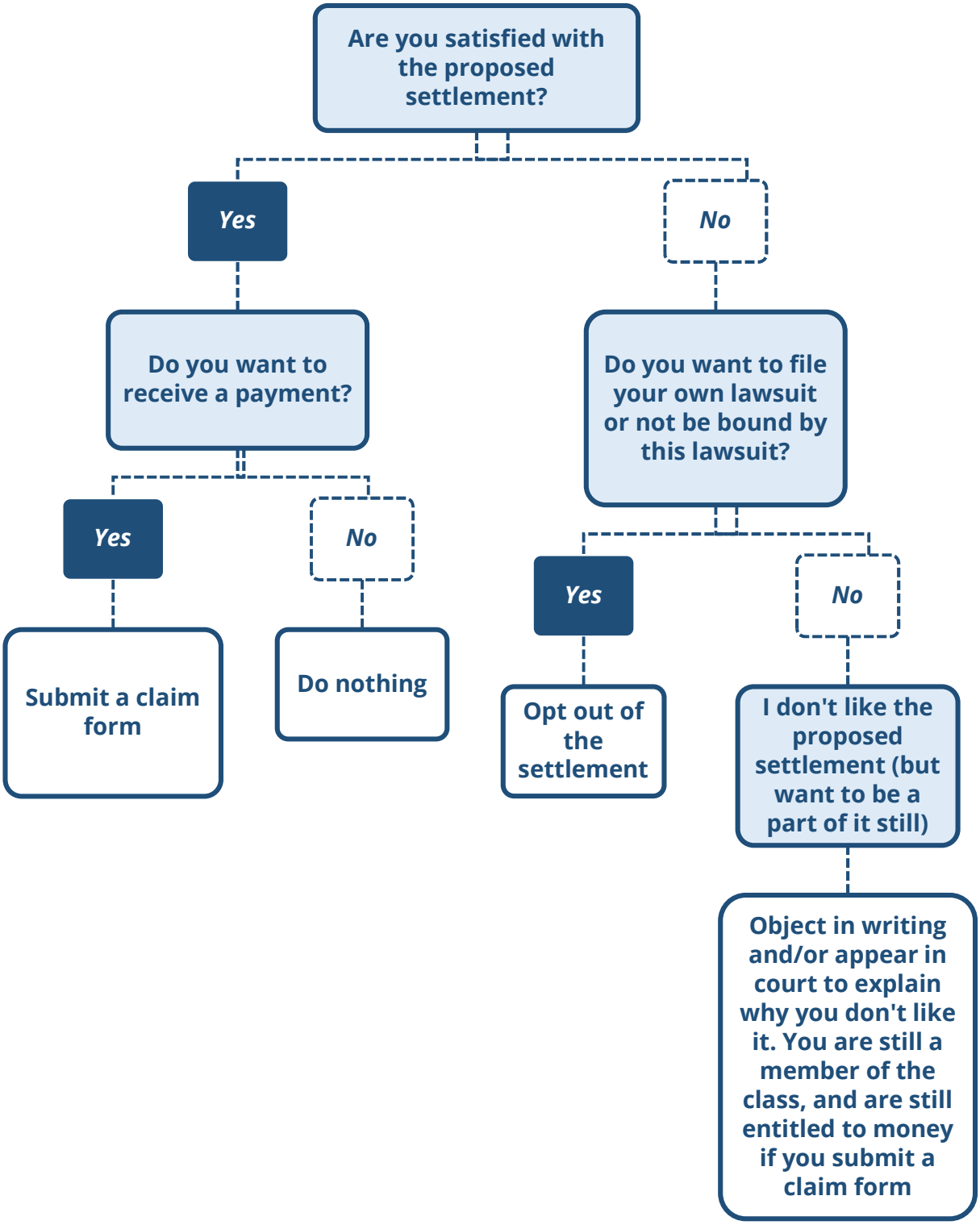
Deciding What to Do

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
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 31, 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 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

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 December 6, 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 to the Settlement Administrator at:

CLEAR Privacy Settlement
Attn: Opt Outs
P.O. Box 58220
Philadelphia, PA 19102

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.

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 lawyer to help you.

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

(1) is received by 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 letter must be received by the Court by 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

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/.

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.

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
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

Tribunal de Distrito de los Estados Unidos para el Distrito Norte de California

Brooks v. Thomson Reuters Corp.

Caso N.° 3:21-cv-01418

Aviso de demanda colectiva

Autorizado por el Tribunal de Distrito de los Estados Unidos

¿Residió en California durante algún período de tiempo entre el 3 de diciembre de 2016 y el 31 de octubre de 2024?

Hay un acuerdo de $27,500,000 por una demanda.

Es posible que usted tenga derecho a recibir dinero.

La cantidad depende del número de reclamaciones presentadas, pero se calcula entre $19 y $48.

Para ser parte de este acuerdo, usted debe hacer lo siguiente:

Leer este aviso.

Responder a más tardar el 6 de diciembre de 2024.

Información importante que debe saber:

- Si no hace nada, seguirá estando obligado en los términos del acuerdo y sus derechos se verán afectados.
- Puede obtener más información en: www.ClearPrivacySettlement.com.

Contenidos

Acerca de este aviso 4
¿Por qué recibí este aviso? 4
¿Qué puedo hacer? 4
¿Cuáles son las fechas más importantes? 5
Enterarse de qué se trata la demanda 5
¿De qué se trata esta demanda? 5
¿Por qué existe un acuerdo en esta demanda? 6
¿Qué sucederá después en esta demanda? 6
Enterarse de qué se trata el acuerdo 7
¿Qué ofrece el acuerdo? 7
¿Cómo puedo saber si formo parte del acuerdo? 8
¿De cuánto será mi pago? 8
Decidir qué hacer 8
¿Cómo sopeso mis opciones? 8
Presentar un reclamo 11
¿Cómo obtengo un pago si soy miembro del grupo de la demanda? 11
¿Cuento con un abogado en esta demanda? 11
¿Tengo que pagarles a los abogados en esta demanda? 12
Solicitar la exclusión 12
¿Qué pasa si no quiero ser parte de este acuerdo? 12
¿Cómo puedo solicitar la exclusión? 13
Objetar 13
¿Qué pasa si no coincido con el acuerdo? 13
No hacer nada 14

¿Cuáles son las consecuencias de no hacer nada? 14
Recursos clave..... 15
¿Cómo obtengo más información? 15

Acerca de este aviso

¿Por qué recibí este aviso?

Este aviso es para informarle sobre el acuerdo de una demanda colectiva, *Brooks v. Thomson Reuters Corp.*, presentada en nombre de residentes actuales y anteriores de California que alegan que Thomson Reuters puso a la venta información sobre ellos a través de su producto, CLEAR. **Usted recibió este aviso porque puede que sea miembro del grupo de personas afectadas, denominado el "grupo". Es posible que tenga derecho a una compensación monetaria como parte de este acuerdo de demanda colectiva. En este momento, es imposible calcular con precisión cuánto dinero está disponible para cada miembro del grupo, ya que dependerá de cuántos miembros del grupo presenten reclamos. Los cálculos actuales sugieren que podría tener derecho a entre $19 y $48.**

Este aviso le brinda un resumen de los términos del acuerdo de conciliación propuesto, explica qué derechos tienen los miembros del grupo y les ayuda a tomar decisiones informadas sobre qué acción emprender.

¿Qué puedo hacer?

Lea este aviso para entender el acuerdo y determinar si usted es un miembro del grupo de la demanda colectiva. Luego, decida si quiere:

Opciones	Más información sobre cada opción
Presentar un formulario de reclamo	Debe presentar un reclamo para recibir un pago. Usted quedará obligado conforme a los términos del acuerdo.
No hacer nada.	No recibirá ningún pago. Renuncia a los derechos resueltos mediante el acuerdo.
Solicitar la exclusión	No recibirá ningún pago. Le permite presentar otra demanda contra Thomson Reuters sobre los mismos temas.
Objetar	Indica al Tribunal por qué no está conforme con el acuerdo. Si objeta, seguirá siendo miembro del grupo a

	menos que también envíe una exclusión en tiempo y forma. Si objeta, también debe presentar un formulario de reclamo para recibir dinero.

Siga leyendo para entender los detalles del acuerdo y lo que cada elección representa para usted.

¿Cuáles son las fechas más importantes?

La fecha límite para enviar un formulario de reclamo: **6 de diciembre de 2024**
Su fecha límite para objetar o excluirse: **6 de diciembre de 2024**
Audiencia de aprobación del acuerdo: **13 de febrero de 2025**

Enterarse de qué se trata la demanda

¿De qué se trata esta demanda?

¿Dónde puedo obtener más información?
Puede obtener una copia completa del acuerdo propuesto y otros documentos clave de esta demanda en: www.ClearPrivacySettlement.com

En diciembre de 2020, se presentó esta demanda colectiva contra Thomson Reuters. La demanda fue presentada en nombre de residentes actuales y anteriores de California que alegan que Thomson Reuters puso a la venta información sobre ellos a través de su producto, CLEAR. Las demandas afirman que Thomson Reuters violó los derechos de privacidad de los californianos al vender el acceso a su información personal sin el consentimiento de los californianos.

Thomson Reuters niega haber hecho algo indebido.

Todos los documentos del caso que se han presentado públicamente en este caso también están disponibles en línea a través del sistema de Acceso Público a los Registros Electrónicos del Tribunal (PACER) en https://ecf.cand.uscourts.gov. Este caso se denomina Brooks v. Thomson Reuters Corp. y el número de caso es 3:21-cv-01418-EMC. También puede obtener los documentos del caso si visita la oficina del

Secretario del Tribunal de Distrito de los Estados Unidos para el Distrito Norte de California, División de San Francisco, de lunes a viernes de 9:00 a. m. a 4:00 p. m., excepto los feriados celebrados por el Tribunal.

¿Por qué existe un acuerdo en esta demanda?

En 2024, las partes convinieron llegar a un acuerdo, lo que significa que han llegado a un acuerdo para resolver la demanda. Ambas partes quieren evitar el riesgo y los gastos que conllevaría un litigio extendido.

¿Qué es un acuerdo de demanda colectiva?
Un acuerdo de demanda colectiva es un convenio entre las partes para resolver y poner fin al caso. Los acuerdos pueden proporcionar dinero a los miembros del

El acuerdo es en nombre de los californianos que presentaron el caso y de todos los miembros del grupo del acuerdo, que incluye a todas las personas que, entre el 3 de diciembre de 2016 y el 31 de octubre de 2024, residieron en el estado de California y cuya información Thomson Reuters puso a disposición a través del producto CLEAR. El Tribunal no ha decidido este caso a favor de ninguna de las partes.

¿Qué sucederá después en esta demanda?

El Tribunal celebrará una audiencia de justicia para decidir si aprueba el acuerdo. La audiencia se llevará a cabo en:

Dónde: Tribunal de Distrito de los Estados Unidos para el Distrito Norte de California, Palacio de Justicia de San Francisco, sala 5, piso 17, 450 Golden Gate Avenue, San Francisco, CA 94102

Cuándo: 1:30 p. m. hora del Pacífico del 13 de febrero de 2025.

El Tribunal ha ordenado a las partes que le envíen este aviso a usted sobre el acuerdo propuesto. Dado que el acuerdo de una demanda colectiva decide los derechos de todos los miembros del grupo propuesto, el Tribunal debe dar su aprobación final al acuerdo antes de que pueda ser efectivo. Los pagos solo se realizarán si el Tribunal aprueba el acuerdo.

No es necesario que usted asista, pero puede hacerlo por su cuenta y cargo. También puede pedirle permiso al Tribunal para hablar y expresar su opinión sobre el acuerdo. Si el Tribunal no aprueba el acuerdo o las partes deciden terminarlo, será nulo y la demanda continuará. **La fecha de la audiencia puede cambiar sin previo aviso a los miembros del grupo.** Para obtener más información y confirmar la fecha de la audiencia, visite www.ClearPrivacySettlement.com.

Enterarse de qué se trata el acuerdo

¿Qué ofrece el acuerdo?

El acuerdo dispone medidas cautelares y compensaciones monetarias para los miembros del grupo. Más específicamente, el acuerdo paga dinero a los residentes actuales y anteriores de California cuya información supuestamente se puso a disposición a través del producto de Thomson Reuters, CLEAR, y exigirá que Thomson Reuters cambie algunas de sus prácticas en la operación de CLEAR. Thomson Reuters ha acordado mejorar su procedimiento de exclusión voluntaria para los californianos que buscan eliminar su información personal de CLEAR o revisar la información sobre ellos en CLEAR, poner más información sobre CLEAR a disposición de los californianos que deseen saber más sobre cómo se utiliza su información, y realizar una serie de cambios en la configuración de CLEAR y las prácticas de Thomson Reuters en la gestión de CLEAR. Los términos completos del acuerdo, incluidos los cambios específicos en las prácticas comerciales que Thomson Reuters ha acordado implementar, se pueden encontrar en www.ClearPrivacySettlement.com.

Thomson Reuters acordó pagar $27,500,000 a un fondo del acuerdo. Este dinero se dividirá entre los miembros del grupo y también se utilizará para pagar los costos y honorarios aprobados por el Tribunal, incluidos los honorarios de los abogados (que son $6,875,000 o el 25 % del fondo del acuerdo), los costos de los abogados incurridos en el litigio de este caso (que no excederán los $700,000) y el costo de administrar este acuerdo (se espera que no supere los $485,000). Después de las deducciones, los fondos restantes se dividirán en

partes iguales entre los miembros del grupo que presenten en tiempo y forma los formularios de reclamo. En este momento no es posible realizar un cálculo preciso de la cantidad que recibirá cada miembro del grupo de la demanda colectiva, ya que depende del número de reclamos que se presenten. **Sin embargo, según los cálculos actuales, se espera que los miembros del grupo puedan recibir entre $19 y $48**. Los miembros del grupo del acuerdo "eximirán" sus reclamos como parte del acuerdo, lo que significa que, como mínimo, no pueden demandar a Thomson Reuters por los mismos temas tratados en esta demanda. Los términos completos de la eximición se pueden encontrar en www.ClearPrivacySettlement.com.

Si queda dinero después de que se complete el proceso de reclamos, se donará a organizaciones aprobadas por el Tribunal.

¿Cómo puedo saber si formo parte del acuerdo?

Si residió en California durante cualquier período de tiempo entre el 3 de diciembre de 2016 y el 31 de octubre de 2024, y tenía 18 años (o más) durante ese tiempo, puede ser miembro del grupo y tener derecho a recibir dinero.

¿De cuánto será mi pago?

El importe de los pagos a los miembros individuales del grupo dependerá del número de reclamos válidos presentados. Dado que el monto del pago final no puede calcularse antes de que se reciban y verifiquen todos los reclamos de indemnización, no será posible proporcionar el monto exacto del pago por cada reclamo válido antes de la fecha límite para presentar los reclamos. **Sin embargo, según los cálculos actuales, los miembros individuales del grupo pueden esperar recibir entre $19 y $48**.

Decidir qué hacer

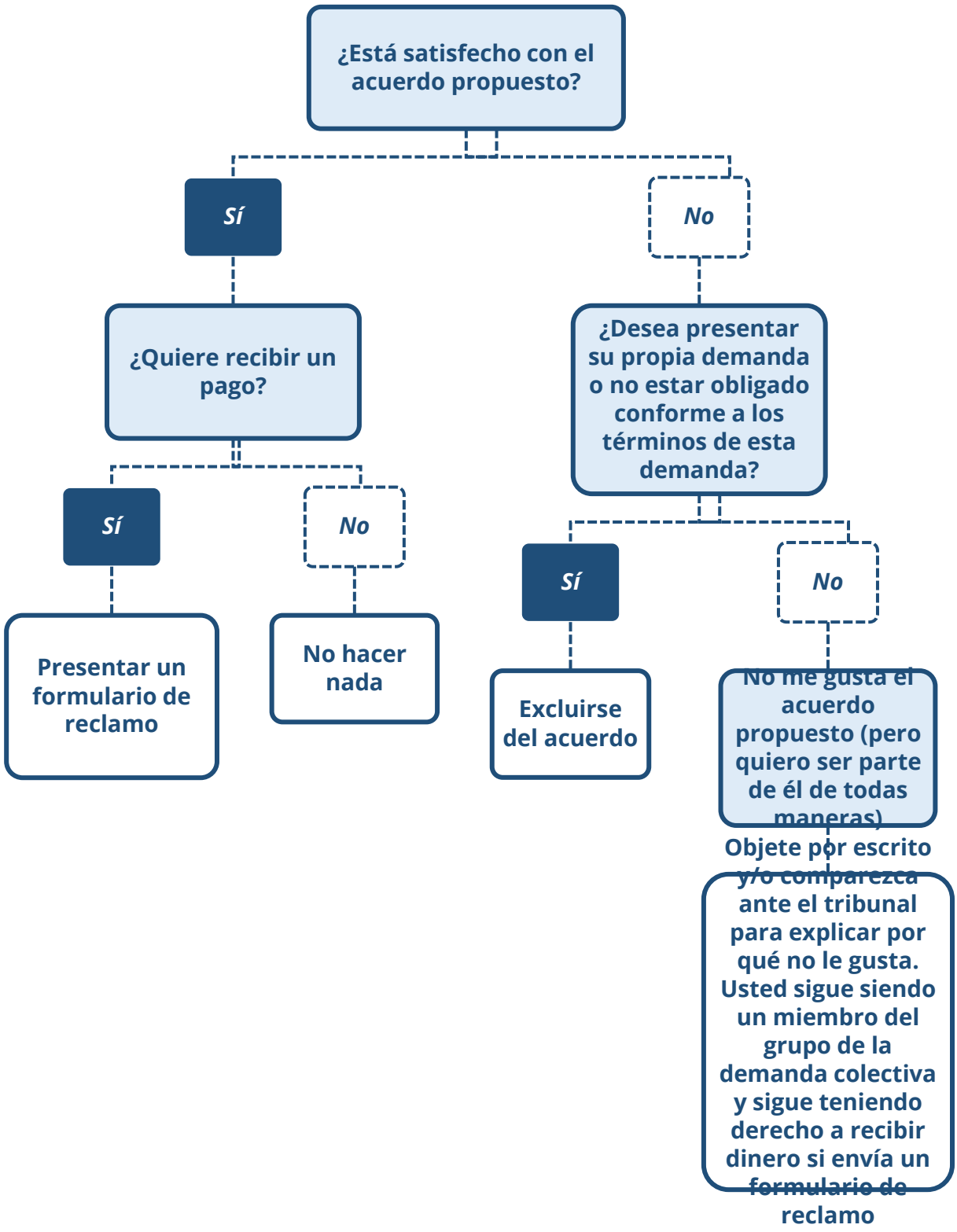
¿Cómo sopeso mis opciones?

Tiene cuatro opciones. Puede permanecer en el acuerdo y presentar

un reclamo, puede excluirse del acuerdo, puede objetar el acuerdo o puede no hacer nada. Esta tabla muestra los efectos de cada opción:

	Presentar un reclamo	**Solicitar la exclusión**	**Objetar**	**No hacer nada.**
¿Puedo recibir dinero del acuerdo si yo...?	SÍ	NO	SÍ (si también presenta un reclamo)	NO
¿Estoy obligado conforme a los términos de esta demanda si yo...?	SÍ	NO	SÍ	SÍ
¿Puedo presentar mi propio caso si yo...?	NO	SÍ	NO	NO
¿Me representarán los abogados del grupo si yo...?	SÍ	NO	NO	SÍ

Elija el mejor camino para usted:



Presentar un reclamo

¿Cómo obtengo un pago si soy miembro del grupo de la demanda?

Si desea recibir dinero, debe enviar un formulario de reclamo completado al Administrador del Acuerdo en línea o descargar un formulario de reclamo en www.ClearPrivacySettlement.com y enviar un formulario completado por correo postal al Administrador del Acuerdo (dirección a continuación). Para presentar un formulario de reclamo debidamente completado, deberá firmar una declaración de que vivió en California durante cualquier período de tiempo entre el 3 de diciembre de 2016 y el 31 de octubre de 2024. Esa declaración se hará bajo pena de perjurio, lo que significa que si a sabiendas proporciona información falsa en esa declaración, es un delito grave.

Debe presentar un formulario de reclamo a más tardar el 6 de diciembre de 2024 para recibir dinero del acuerdo.

¿Cuento con un abogado en esta demanda?

En una demanda colectiva, el tribunal designa a representantes del grupo de la demanda y abogados para que trabajen en el caso y representen los intereses de todos los miembros del grupo. Para este acuerdo, el Tribunal ha designado a las siguientes personas y abogados.

Sus abogados:

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, D.C. 20005

Estos son los abogados que negociaron este acuerdo en su nombre.

Si desea ser representado por su propio abogado, puede contratar

uno a su cargo.

¿Tengo que pagarles a los abogados en esta demanda?

Los honorarios y costos de los abogados se pagarán con cargo al fondo del acuerdo. **No tendrá que pagar directamente a los abogados.**

Hasta la fecha, a sus abogados no se les ha pagado ningún dinero por su trabajo o los gastos que han hecho por el caso. Para pagar parte de su tiempo y riesgo al presentar este caso sin ninguna garantía de pago a menos que tuvieran éxito, sus abogados solicitarán, como parte de la aprobación final de este Acuerdo, que el Tribunal apruebe un pago por sus servicios legales, una solicitud que no pedirá más de $6,875,000 (25 %) en total en honorarios legales más el reembolso de los gastos de bolsillo (que no excederán los $700,000). Sus abogados también le pedirán al Tribunal que apruebe los costos de administrar este acuerdo a medida que se incurre en esos costos, que actualmente se estiman en $485,000.

Los honorarios y gastos legales solo se otorgarán si el Tribunal lo aprueba como un monto justo y razonable. Tiene derecho a oponerse a los honorarios de los abogados, incluso si cree que los términos del acuerdo son justos.

Sus abogados también le pedirán al Tribunal que apruebe un pago de $5,000 a cada uno de los dos Representantes del Grupo por el tiempo y el esfuerzo que contribuyeron al caso. De ser aprobado por el Tribunal, esto se pagará del Fondo del Acuerdo.

Solicitar la exclusión

¿Qué pasa si no quiero ser parte de este acuerdo?

Puede solicitar ser excluido. Si se excluye, no recibirá ningún pago y no podrá oponerse al acuerdo. Sin embargo, no estará obligado ni afectado por nada de lo que suceda en esta demanda y es posible que pueda presentar su propio caso. No puede excluirse de los cambios en el programa que exige el acuerdo propuesto. La siguiente sección le

indica cómo enviar una solicitud de exclusión (por correo postal o en línea).

Debe enviar una solicitud de exclusión que se reciba a más tardar el 6 de diciembre de 2024 para excluirse del acuerdo.

¿Cómo puedo solicitar la exclusión?

Para excluirse del acuerdo, debe completar el formulario de exclusión disponible en www.ClearPrivacySettlement.com y enviarlo en línea en www.ClearPrivacySettlement.com o enviarlo por correo postal al Administrador del Acuerdo a:

CLEAR Privacy Settlement
Attn: Opt Outs
P.O. Box 58220
Filadelfia, PA 19102

Ya sea que envíe el formulario de exclusión en línea o lo envíe por correo, el administrador del acuerdo debe recibirlo a más tardar el 6 de diciembre de 2024 para que sea válido. Asegúrese de incluir su nombre, dirección, número de teléfono (y/o dirección de correo electrónico) y firma. Las instrucciones completas para enviar una solicitud de exclusión están disponibles en www.ClearPrivacySettlement.com.

Objetar

¿Qué pasa si no coincido con el acuerdo?

Si no coincide con alguna parte del acuerdo (incluidos los honorarios de los abogados) pero no desea excluirse, puede objetar. Si se opone, sigue siendo un miembro del grupo de la demanda colectiva y aún debe presentar un formulario de reclamo por separado si desea recibir dinero del acuerdo. Cuando presente su objeción, debe dar las razones por las que cree que el Tribunal no debería aprobarla y decir si su objeción se aplica solo a usted, a una parte del grupo o a todo el grupo. El Tribunal tomará en cuenta su punto de vista. El Tribunal solo

puede aprobar o denegar el acuerdo, no puede cambiar los términos del acuerdo. Usted puede contratar a su propio abogado para que le ayude, pero no es necesario.

Para objetar, debe enviar una carta al Tribunal que:

(1) se reciba a más tardar el 6 de diciembre de 2024;
(2) incluya el nombre y número del caso (*Brooks v. Thomson Reuters Corp.*, N.° 3:21-cv-01418)
(3) incluya su nombre completo, dirección y número de teléfono, y dirección de correo electrónico (si tiene una);
(4) indique los motivos de su objeción;
(5) diga si usted o su abogado tienen la intención de comparecer en la audiencia de aprobación final y el nombre de su abogado;
(6) lleve su firma.

El Tribunal debe recibir su carta a más tardar el 6 de diciembre de 2024 para que su objeción sea válida. Envíe la carta por correo postal a:

	U.S. District Court San Francisco Courthouse, Courtroom 5 - 17th Floor 450 Golden Gate Avenue San Francisco, CA 94102

También puede presentar su objeción en el expediente de esta demanda a través del sistema PACER o el sistema de presentación electrónica de casos del Tribunal a más tardar el 6 de diciembre de 2024. Para obtener instrucciones sobre cómo presentarla, visite www.cand.uscourts.gov/cases-e-filing/.

No hacer nada

¿Cuáles son las consecuencias de no hacer nada?

Si no hace nada, no recibirá ningún dinero, pero aún estará obligado conforme a los términos del acuerdo y sus disposiciones de "eximición". Eso significa que no podrá iniciar, continuar o ser parte de

ninguna otra demanda contra, como mínimo, Thomson Reuters sobre los temas tratados en este caso. Consulte el acuerdo de conciliación, que se puede encontrar en www.ClearPrivacySettlement.com, para obtener una descripción completa de los reclamos y las personas que serán eximidas si se aprueba este acuerdo.

Recursos clave

¿Cómo obtengo más información?

Este aviso es sólo un resumen del acuerdo propuesto. El acuerdo completo con todos sus términos se puede consultar aquí. Para obtener una copia del acuerdo de conciliación u obtener respuestas a sus preguntas:

- póngase en contacto con su abogado (información a continuación)
- visite el sitio web del caso en www.ClearPrivacySettlement.com
- acceda al sistema de Registros Electrónicos del Tribunal (PACER) en línea o mediante una visita a la oficina del Secretario del Tribunal (dirección a continuación).

Recurso	Información de contacto
Sitio web del caso	www.ClearPrivacySettlement.com
Administrador del Acuerdo	CLEAR Privacy Settlement c/o Settlement Administrator 1650 Arch Street, Suite 2210 Philadelphia, PA 19103 1-855-969-4049 info@clearprivacysettlement.com
Sus abogados	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, D.C. 20005
Tribunal (NO CONTACTAR)	U.S. District Court San Francisco Courthouse, Courtroom 5 - 17th Floor 450 Golden Gate Avenue San Francisco, CA 94102

美国加利福尼亚州北区地区法院

布鲁克斯诉汤森路透公司
(Brooks v. Thomson Reuters Corp.)

案件编号 3:21-cv-01418

集体诉讼通知

由美国 地区法院授权

在 2016 年 12 月 3 日至 2024 年 10 月 31 日期间，您是否在加利福尼亚州居住过？

有一项 $27,500,000 的诉讼和解。

您可能有权获得和解金。

其金额取决于提交的索赔数量，估计在 $19 - $48 之间。

若要参与此和解，您应该：

阅读此通知；

并于 2024 年 12 月 6 日前回复。

重要须知：

- 如果您不采取任何行动，您仍将受到和解协议的约束，您的权利也将受到影响。
- 如需了解更多信息，请访问：www.ClearPrivacySettlement.com。

目录

关于此通知 3
为什么我会收到此通知？ 3
接下来我该怎么做？ 3
有哪些最重要的日期？ 3
诉讼概况 3

这起诉讼是怎么回事？ 4
为什么这起诉讼会达成和解？ 4
这起诉讼接下来会发生什么？ 4
诉讼概况 5
和解提供了什么？ 5
我如何知道自己是否属于此和解的一员？ 5
我可以获得多少和解金？ 6
决定要怎么做 6
我如何权衡自己的选项？ 6
提交索赔表 8
如果我是集体成员，如何获得和解金？ 8
在这起诉讼中，我有律师吗？ 8
在这起诉讼中，我需要支付律师的费用吗？ 8
退出 9
如果我不想参与此次和解，该怎么做？ 9
如何退出？ 9
反对 9
如果我不同意此次和解，该怎么做？ 10
什么都不做 10
什么都不做会有什么后果？ 10
关键资源 11
如何获得更多信息？ 11

关于此通知

为什么我会收到此通知？

此通知旨在向您告知*布鲁克斯诉汤森路透公司 (Brooks v. Thomson Reuters Corp.)* 这起集体诉讼的和解，这起诉讼由加州的现居民和前居民提起，他们指控汤森路透通过其产品 CLEAR 将居民信息用于销售。 **您收到此通知，是因为您可能是受影响人群（称为“集体”）中的一员 。作为此集体诉讼和解的一部分，您可能有权获得金钱救济。 目前，尚无法准确估计每位集体成员可获得多少赔偿金，因为这将取决于有多少集体成员提交索赔表。 目前的估计是，您可能有权获得的金额在 $19 - $48 之间。**

此通知为您提供了拟议和解协议的条款摘要，解释了集体成员享有的权利，并帮助集体成员在知情情况下决定采取何种行动。

接下来我该怎么做？

请阅读此通知以了解和解内容并确定您是否为集体成员。 然后，您将决定是否要：

选项	有关每个选项的解释
提交索赔表	您必须提交索赔表，才能收到和解金。 您将受和解协议的约束。
什么都不做	得不到和解金。 放弃通过和解解决该问题的权利。
退出	得不到和解金。 允许您就同一问题对汤森路透另行提起诉讼。
反对	告诉法院您不愿意和解的原因。 如果您反对，您仍是集体成员，除非您还按时提交退出表。 如果您反对，您还必须提交索赔表，才能获得和解金。

请继续阅读，了解和解的具体内容以及每个选择对您意味着什么。

有哪些最重要的日期？

提交索赔表的截止日期： **2024 年 12 月 6 日**
反对或退出的截止日期：**2024 年 12 月 6 日**
和解批准听证会：**2025 年 2 月 13 日**

诉讼概况

这起诉讼是怎么回事？

2020 年 12 月，汤森路透被提起集体诉讼。 该诉讼是代表加州现居民和前居民提起的，指控汤森路透通过其产品 CLEAR 将居民信息用于销售。 诉讼声称，汤森路透在未经加州居民同意的情况下出售其个人信息，侵犯了加州居民的隐私权。

汤森路透否认自己做了错事。

在哪里可以了解更多信息？
您可以在以下网址获得这起诉讼的拟议和解协议和其他关键文件的完整副本：
www.ClearPrivacySettlement.com

本案公开提交的所有案件文件也可通过法院的“公众查阅法院电子记录”系统在线查阅，网址是 https://ecf.cand.uscourts.gov。 此案件名为布鲁克斯诉汤森路透公司 (Brooks v. Thomson Reuters Corp.)，案件编号为 3:21-cv-01418-EMC。 您可以在周一至周五上午 9:00 至下午 4:00（法院节假日除外）到访美国加利福尼亚州北区地方法院旧金山分院书记员办公室索取案件文件。

为什么这起诉讼会达成和解？

2024 年，双方同意和解，这意味着他们已经达成了解决这起诉讼的协议。 双方都希望避免进一步诉讼的风险和费用。

和解涉及提起诉讼的加利福尼亚州居民以及和解集体的所有成员，其中包括在 2016 年 12 月 3 日至 2024 年 10 月 31 日期间在加利福尼亚州居住且汤森路透通过 CLEAR 产品公开其信息的所有人员。 法院没有对该案件作出有利于任何一方的裁决。

什么是集体诉讼和解？
集体诉讼和解是指双方为解决和结束案件而达成协议。和解可以为集体成员支付和解金，并改变造成伤害的做法。

这起诉讼接下来会发生什么？

法院将举行公平听证会，以决定是否批准和解。 听证会将于以下地点和时间举行：

地点：美国加利福尼亚州北区地方法院旧金山分院 5 号审判室（17th Floor, 450 Golden Gate Avenue, San Francisco, CA 94102）

时间：2025 年 2 月 13 日 下午 1:30（太平洋时间）。

法院已指示双方就拟议的和解向您发送此通知。 由于集体诉讼的和解会决定拟议集体诉讼所有成员的权利，因此法院必须在和解生效之前对和解给予最终批准。 只有在法院批准和解后，才会支付和解金。

您不必出席听证会，但可以自费出席。 您还可以请求法院允许您就和解发表意见。 如果法院不批准和解或双方决定终止和解，则该和解无效，诉讼将继续。 **听证会的日期可能会发生变更，恕不另行通知集体成员。** 如需了解更多信息并确认听证会日期，请访问 www.ClearPrivacySettlement.com 。

诉讼概况

和解提供了什么？

此项和解为集体成员提供了金钱和禁令救济。 更具体地说，该和解协议将向加州现居民和前居民支付和解金（因指控居民信息是通过汤森路透的产品 CLEAR 公开的），并将要求汤森路透改变其在运作 CLEAR 方面的一些做法。 汤森路透已同意加强其用户选择退出程序，方便希望从 CLEAR 中删除其个人信息或在 CLEAR 中查看有关其信息的加州居民，向希望更多地了解其信息如何被使用的加州居民提供有关 CLEAR 的更多信息，并对 CLEAR 的设置和汤森路透管理 CLEAR 的做法进行一系列改变。 和解协议的完整条款，包括汤森路透同意实施的具体商业做法变更，可在 www.ClearPrivacySettlement.com 查阅。

汤森路透已同意向和解基金支付 $27,500,000。 这笔资金将在集体成员之间分配，还将用于支付法院批准的开支和费用，包括律师费（$6,875,000，占和解基金的 25%），报销本案诉讼所产生的律师开支（不超过 $700,000）和管理这项和解的开支（预计不超过 $485,000）。 扣除后的剩余资金将由按时提交索赔表的集体成员均分。 目前无法准确估计每个集体成员将收到的金额，因为这取决于提交的索赔数量。 **但是，根据目前的估计，预计集体成员可能获得的金额介于 $19 - $48 之间**。 作为和解的一部分，和解集体的成员将“放弃”各自的申索，这意味着至少就这起诉讼中的同一问题而言，其将不能起诉汤森路透。 有关放弃权利的完整条款，请参阅 www.ClearPrivacySettlement.com。

如果在索赔程序完成后仍有剩余资金，这些资金将捐赠给经法院批准的组织。

我如何知道自己是否属于此和解的一员？

如果在 2016 年 12 月 3 日至 2024 年 10 月 31 日期间您在加利福尼亚州居住过，并且在此期间年满 18 岁（或以上），则您可能是该集体的一员并有权获得和解金。

我可以获得多少和解金？

向单个集体成员支付的金额取决于提交的有效索赔的数量。 由于在收到并核实所有赔偿要求之前无法计算最后付款额，因此在提出索赔的截止日期之前无法提供每个有效索赔的和解金确切金额。 **然而，根据目前的估计，预计单个集体成员可获得的金额介于 $19 - $48 之间**。

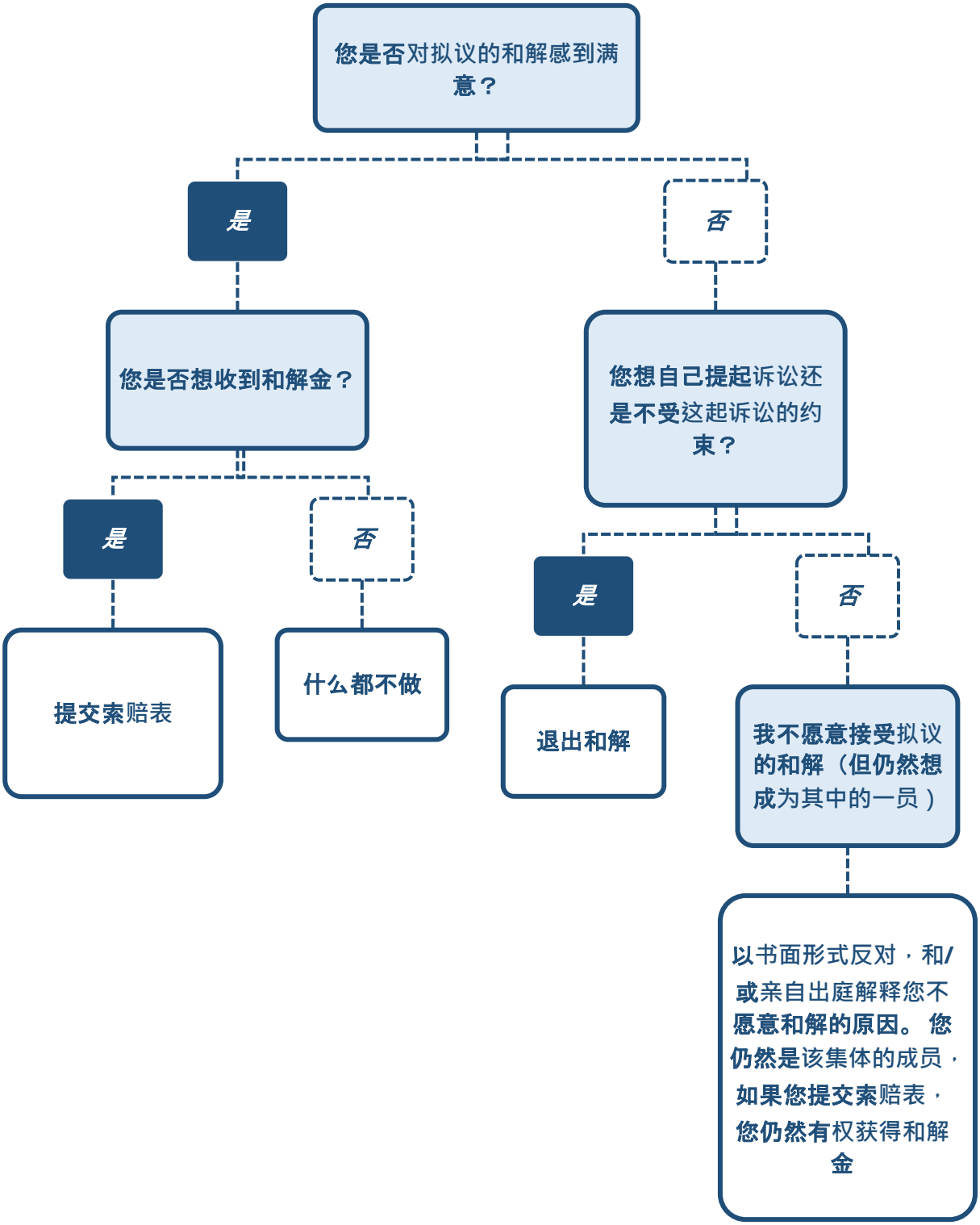
决定要怎么做

我如何权衡自己的选项？

您有四个选项。 您可以留在和解中并提交索赔表，可以退出和解，可以反对和解，或者可以什么都不做。 此图表显示了每个选项的影响：

	提交索赔表	退出	反对	什么都不做
如果我……，我是否能够获得和解金？	是	否	是（如果您还提交索赔表）	否
如果我……，我是否受这起诉讼和解条款的约束？	是	否	是	是
如果我……，我是否可以继续自己起诉？	否	是	否	否
如果我……，集体律师是否会代表我？	是	否	否	是

选择最适合自己的路径：


您是否对拟议的和解感到满意？
是
否
您是否想收到和解金？
您想自己提起诉讼还是不受这起诉讼的约束？
是
否
是
否
提交索赔表
什么都不做
退出和解
我不愿意接受拟议的和解（但仍然想成为其中的一员）
以书面形式反对，和/或亲自出庭解释您不愿意和解的原因。 您仍然是该集体的成员，如果您提交索赔表，您仍然有权获得和解金

提交索赔表

如果我是集体成员，如何获得和解金？

如果您希望获得和解金，您必须在线向和解管理员 (Settlement Administrator) 提交填妥的索赔表，或在 www.ClearPrivacySettlement.com 下载索赔表，填妥后邮寄给和解管理员（地址如下）。 要提交相应的索赔表，您必须签署一份声明，声明在 2016 年 12 月 3 日至 2024 年 10 月 31 日期间，您在加利福尼亚州居住过。 该声明将受到伪证处罚的约束，这意味着如果您在声明中故意提供虚假信息，则构成重罪。

您必须在 2024 年 12 月 6 日之前提交索赔表，才能获得和解和解金。

在这起诉讼中，我有律师吗？

在集体诉讼中，法院指定有集体代表和律师来办理案件，并代表所有集体成员的利益。 为达成这项和解，法院任命了下列个人和律师。

您的律师：

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

上述律师代表您谈判以达成和解。

如果您想由自己的律师代理，可以自费聘请律师。

在这起诉讼中，我需要支付律师的费用吗？

律师费和开支将从和解基金中支付。 **您无需直接向律师支付费用。**

迄今为止，您的律师尚未获得任何工作报酬，也尚未报销为案件垫付的费用。 为了支付他们在提起本诉讼过程中的一些时间和风险（即除非胜诉，否则没有任何付款保障），作为本和解最终批准的一部分，您的律师将请求法

院批准支付法律服务费用，总额为不超过 $6,875,000（25%） 的律师费加上垫付费用报销（不超过 $700,000）。 律师还将要求法院批准因管理这项和解业已产生的费用，目前估计为 $485,000。

律师费和开支只有在法院批准金额公平合理后才会判给。 即使您认为和解条款公平，您也有权反对律师费用。

律师还将请求法院批准向两位集体代表每人支付 $5,000，以报答他们为案件贡献的时间和精力。 如果法院批准，这笔费用将从和解基金中支付。

退出

如果我不想参与此次和解，该怎么做？

您可以退出。 如果您这样做，您将不会收到和解金，也不能反对和解。 但是，您不会受到此诉讼中发生的任何事情的约束或影响，并且可以自己提起诉讼。 您不能将自己排除在拟议和解所要求的程序变更之外。 以下部分向您介绍如何提交退出表（通过邮件或线上方式）。

为将自己排除在和解之外，您必须提交退出表，和解管理员应在 2024 年 12 月 6 日之前收到该文件。

如何退出？

要退出和解，您必须填写 www.ClearPrivacySettlement.com 上发布的退出表，并在 www.ClearPrivacySettlement.com 在线提交退出表或邮寄给和解管理员：

CLEAR Privacy Settlement
Attn: Opt Outs
P.O. Box 58220
Philadelphia, PA 19102

无论您是在线提交还是邮寄退出表，和解管理员必须在 2024 年 12 月 6 日之前收到该表方为有效。 请务必提供您的姓名、地址、电话号码（和/或电子邮件地址）和签名。 有关提交退出表的完整说明，请访问 www.ClearPrivacySettlement.com。

反对

如果我不同意此次和解，该怎么做？

如果您不同意和解的任何部分（包括律师费），但不想退出，您可以反对。 如果您反对，您仍然是集体成员；如果您想获得和解金，您仍然必须提交单独的索赔表。 当提交反对时，您必须给出您认为法院不应该批准和解的理由，并说明您的反对意见是只适用于您、集体的一部分还是适用于整个集体。 法院会考虑您的意见。 法院只能批准或否决和解，而不能改变和解的条款。 您可以（但非必要）自己聘请律师来协助您。

要提出反对，您必须按以下要求致函法院：

(1) 在 2024 年 12 月 6 日之前收到；
(2) 包含案件名称和编号（*Brooks v. Thomson Reuters Corp.*，编号 3:21-cv-01418）
(3) 包括您的全名、地址和电话号码以及电子邮件地址（如有）；
(4) 说明反对的理由；
(5) 说明您或您的律师是否打算出席最终批准听证会，以及律师的姓名；
(6) 您的签名。

法院必须在 2024 年 12 月 6 日之前收到您的信件，方为有效。 请将信函寄至：

	U.S. District Court San Francisco Courthouse, Courtroom 5 - 17th Floor 450 Golden Gate Avenue San Francisco, CA 94102

您也可以在 2024 年 12 月 6 日之前通过法院的 PACER 或电子案件提交系统在这起诉讼的待审案件表上提出反对。 有关如何提交文件的说明，请访问 www.cand.uscourts.gov/cases-e-filing/。

什么都不做

什么都不做会有什么后果？

如果您什么都不做，您不会得到任何和解金，但仍然会受到和解协议及其“放弃权利”条款的约束。 这意味着您至少无法就本案中的问题发起、继续或参与任何其他针对汤森路透的诉讼。 请参阅和解协议，该协议发布在 www.ClearPrivacySettlement.com，以了解索赔的完整说明以及此和解倘若获得批准将获得免责的人员。

关键资源

如何获得更多信息？

此通知是拟议和解的摘要。 和解协议的完整文本及其所有条款可在此处查阅。 如需获取和解协议副本或获得问题解答，可采用以下方式：

- 联系您的律师（联系方式如下）
- 访问案例网站 www.ClearPrivacySettlement.com
- 上网或亲临法院书记员办公室（地址如下）进入法院电子纪录系统 (PACER)。

资源	联系方式
案件网站	www.ClearPrivacySettlement.com
和解管理员	CLEAR Privacy Settlement c/o Settlement Administrator 1650 Arch Street, Suite 2210 Philadelphia, PA 19103 1-855-969-4049 info@clearprivacysettlement.com
您的律师	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
法院（请勿联系）	U.S. District Court San Francisco Courthouse, Courtroom 5 - 17th Floor 450 Golden Gate Avenue San Francisco, CA 94102

Exhibit F

Your claim must be submitted online or received by: December 27, 2024

Brooks v. Thomson Reuters Corp.
Case No. 3:21-cv-01418-EMC
United States District Court, Northern District of California

CLEAR PRIVACY SETTLEMENT CLAIM FORM

TRC CLAIM

I. SETTLEMENT CLASS MEMBER NAME AND CONTACT INFORMATION

Provide your name, mailing address, telephone and/or email address. You must notify the Settlement Administrator if your contact information changes after you submit this Claim Form.

First Name **Last Name**

Street Address

City **State** **Zip Code**

Email Address **Telephone Number**

II. PAYMENT SELECTION

Please select from **one** of the following payment options:

☐ **Venmo -** Enter the mobile number associated with your Venmo account: __ __ __-__ __ __-__ __ __ __

☐ **Zelle -** Enter the mobile number or email address associated with your Zelle account:

Mobile Number: _____-_____-_____ or Email Address: _____

☐ **Virtual Prepaid Card -** Enter your email address: _____

☐ **Physical Check -** Payment will be mailed to the address provided in Section I above.

III. ATTESTATION & SIGNATURE

By signing below and submitting this Claim Form, I hereby swear under penalty of perjury that I resided in California for any period of time between December 3, 2016, and October 31, 2024.

I understand that the Settlement Administrator may contact me to request additional information to confirm my membership in the Settlement Class and that failure to provide the Settlement Administrator with the requested information may result in the denial of my Claim Form.

Signature Printed Name Date

Mail your completed Claim Form to:
CLEAR Privacy Settlement, c/o Settlement Administrator, 1650 Arch Street, Suite 2210, Philadelphia, PA 19103.

Su reclamo debe ser presentado en línea o <u>recibido a más tardar el</u>: 6 de diciembre de 2024

Brooks v. Thomson Reuters Corp.
CASO N.º 3:21-cv-01418-EMC
Tribunal de Distrito de los Estados Unidos para el Distrito Norte de California

FORMULARIO DE RECLAMO DEL ACUERDO DE LA DEMANDA POR PRIVACIDAD DE CLEAR

TRC CLAIM

I. NOMBRE DEL MIEMBRO DEL GRUPO DEL ACUERDO E INFORMACIÓN DE CONTACTO

Proporcione su nombre, dirección postal, teléfono o dirección de correo electrónico. Debe notificar al Administrador del Acuerdo si su información de contacto cambia después de haber presentado este Formulario de Reclamo.

Nombre **Apellido**

Dirección

Ciudad **Estado** **Código postal**

Dirección de correo electrónico **Número de teléfono**

II. SELECCIÓN DE MÉTODO DE PAGO

Seleccione **<u>una</u>** de las siguientes opciones de pago:

☐ **Venmo:** Ingrese el número de teléfono celular asociado a su cuenta de Venmo: __ __ __-__ __ __-__ __ __ __

☐ **Zelle:** ingrese el número de teléfono celular o el correo electrónico asociado a su cuenta de Zelle:

Teléfono celular: _____-_____-_____ o correo electrónico: _____

☐ **Tarjeta prepagada virtual:** ingrese su dirección de correo electrónico: _____

☐ **Cheque físico:** el pago se enviará a la dirección indicada anteriormente en la Sección I.

III. CERTIFICACIÓN Y FIRMA

Al firmar a continuación y enviar este Formulario de Reclamo, por la presente juro bajo pena de perjurio que residí en California durante cualquier período de tiempo entre el 3 de diciembre de 2016 y el 31 de octubre de 2024.

Entiendo que el Administrador del Acuerdo puede comunicarse conmigo para solicitar información adicional a fin de confirmar mi pertenencia al Grupo del Acuerdo y que el hecho de no proporcionarle al Administrador del Acuerdo la información solicitada puede provocar que mi Formulario de Reclamo sea denegado.

Firma Nombre en letra de imprenta Fecha:

Envíe su Formulario de Reclamo a:
CLEAR Privacy Settlement, c/o Settlement Administrator, 1650 Arch Street, Suite 2210, Philadelphia, PA 19103.

¿TIENE PREGUNTAS? VISITE WWW.CLEARPRIVACYSETTLEMENT.COM O LLAME SIN COSTO AL 1-855-969-4049

Exhibit G

Your request for exclusion must be received by: December 6, 2024

Brooks v. Thomson Reuters Corp.
Case No. 3:21-cv-01418-EMC
United States District Court, Northern District of California

CLEAR PRIVACY SETTLEMENT REQUEST FOR EXCLUSION

TRC EXCLUSION

Instructions: Visit www.clearprivacysettlement.com to submit your Exclusion Form online or complete and return this form to: CLEAR Privacy Settlement, Attn: Opt Outs, P.O. Box 58220, Philadelphia, PA 19102.

I. SETTLEMENT CLASS MEMBER NAME AND CONTACT INFORMATION

Provide your name, mailing address, telephone and/or email address.

First Name **Last Name**

Street Address

City **State** **Zip Code**

Email Address **Telephone Number**

II. SIGNATURE

By signing below and submitting this Request for Exclusion form, I swear under penalty of perjury that I resided in California for any period of time between December 3, 2016, and October 31, 2024 and wish to exclude myself from the Settlement Class and do not wish to participate in the settlement in Brooks v. Thomson Reuters Corp., No. 3:21-cv-01418.

Signature Printed Name Date

Su solicitud de exclusión se debe recibir a más tardar el:
6 de diciembre de 2024

Brooks v. Thomson Reuters Corp.
CASO N.º 3:21-cv-01418-EMC
Tribunal de Distrito de los Estados Unidos para el Distrito Norte de California

ACUERDO DE LA DEMANDA POR PRIVACIDAD DE CLEAR SOLICITUD DE EXCLUSIÓN

TRC EXCLUSION

Instrucciones: Visite www.clearprivacysettlement.com para enviar su Formulario de Exclusión en línea o complete y envíe este formulario a: CLEAR Privacy Settlement, Attn: Opt Outs, P.O. Box 58220, Filadelfia, PA 19102.

I. NOMBRE DEL MIEMBRO DEL GRUPO DEL ACUERDO E INFORMACIÓN DE CONTACTO

Proporcione su nombre, dirección postal, teléfono o dirección de correo electrónico.

Nombre **Apellido**

Dirección

Ciudad **Estado** **Código postal**

Dirección de correo electrónico **Número de teléfono**

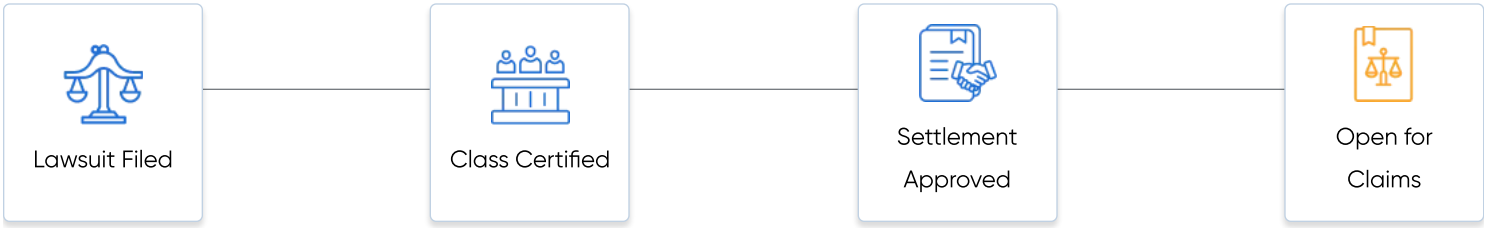
II. FIRMA

Al firmar a continuación y enviar este Formulario de Exclusión, por la presente juro bajo pena de perjurio que residí en California durante cualquier período de tiempo entre el 3 de diciembre de 2016 y el 31 de octubre de 2024 y es mi deseo excluirme del Grupo del Acuerdo y no deseo participar en el acuerdo de la demanda colectiva Brooks v. Thomson Reuters Corp., N.º 3:21-cv-01418.

Firma Nombre en letra de imprenta Fecha:

Exhibit H

Time is running out to submit a claim in the $27.5M Thomson Reuters Clear privacy class action settlement



Top Class Actions | November 22, 2024

Category: Legal News

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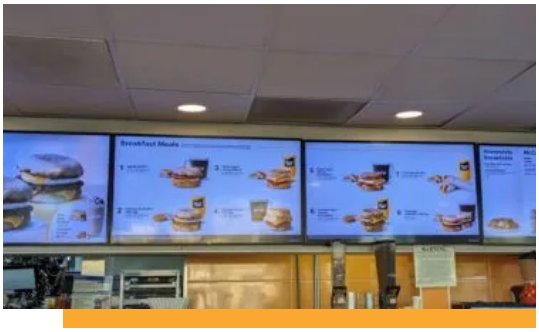
A $27.5 million class action settlement resolves claims that Thomson Reuters' Clear product exposed the personal information of California residents.

The Clear settlement includes all adults who resided in California for any period of time between Dec. 3, 2016, and Oct. 31, 2024. You do not need to have used CLEAR or have an account with CLEAR to qualify. Even if you no longer live in California, you may still qualify if you resided in California at any point during the class period.

Consumers in the Thomson Reuters class action lawsuit claimed the company made their personal information available for sale via Clear. Thomson Reuters allegedly violated Californians' privacy rights by selling access to their personal information without their consent.

Thomson Reuters is an AI and technology company that sells many products, including **Clear**, its public records technology tool.

Under the terms of the Clear settlement, class members can receive an equal share of the net settlement fund. Exact payments will vary depending on the number of claims filed, but estimates suggest each claimant may receive between $19 and $48.



McDonald's orange juice surcharge class action lawsuit investigation

DECEMBER 14, 2024 | LEGAL NEWS

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PFAS chemicals in water supply lawsuit

In addition to providing monetary compensation, Thomson Reuters agreed to change some of its practices in operating Clear, including enhancing its opt-out procedure for Californians, making more information about Clear available to Californians and changing Clear's settings and Thomson Reuters' practices in managing Clear.

The claim form deadline is Dec. 27, 2024.

The deadline for exclusion and objection is Dec. 6, 2024.

The final approval hearing for the Thomson Reuters class action lawsuit settlement is scheduled for Feb. 13, 2025.

Potential Award

$19 to $48 (estimated)

Proof of Purchase

N/A

Claim Form

CLICK HERE TO FILE A CLAIM »

NOTE: If you do not qualify for this settlement do NOT file a claim.

Remember: you are submitting your claim *under penalty of perjury*. You are also harming other eligible Class Members by submitting a fraudulent claim. If you're unsure if you qualify, please read the FAQ section of the Settlement Administrator's website to ensure you meet all standards (Top Class Actions is not a Settlement Administrator). If you don't qualify for this settlement, check out our database of other **open class action settlements** you may be eligible for.

Claim Form Deadline

12/27/2024

Case Name

Brooks v. Thomson Reuters Corp., Case No. 3:21-cv-01418-EMC, in the U.S. District Court for the Northern District of California

Final Hearing

02/13/2025

Settlement Website

ClearPrivacySettlement.com

Claims Administrator

Clear Privacy Settlement Administrator
1650 Arch Street, Suite 2210

Class Counsel

Andre M Mura
GIBBS LAW GROUP LLP

Geoffrey A Graber
COHEN MILSTEIN SELLERS & TOLL PLLC

Defense Counsel

Susan D Fahringer
Nicola C Menaldo
Anna M Thompson
Hayden M Schottlaender
Gabriella Gallego
PERKINS COIE LLP

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- $1M Jefferson Dental TCPA class action settlement
- $1.7M R.R. Donnelley & Sons, Precision Dialogue Direct BIPA class action settlement
- Green Valley data breach class action settlement
- $29.5M Citibank TCPA class action settlement

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13 thoughts on Time is running out to submit a claim in the $27.5M Thomson Reuters Clear privacy class action settlement

Jan Smith says:

December 5, 2024 at 11:13 pm

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Name *

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Please note: Top Class Actions is not a settlement administrator or law firm. Top Class Actions is a legal news source that reports on class action lawsuits, class action settlements, drug injury lawsuits and product liability lawsuits. Top Class Actions does not process claims and we cannot advise you on the status of any class action settlement claim. You must contact the settlement administrator or your attorney for any updates regarding your claim status, claim form or questions about when payments are expected to be mailed out.

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Case 3:21-cv-01418-EMC Document 273-2 Filed 01/09/25 Page 108 of 146

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Recall announced for gyro kits sold at Sam's Club

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$3.25M Bank of America repossession class action settlement

$1.45M Lansing Community College data breach class action settlement

PFAS chemicals in water supply lawsuit investigation

Polaris issues recalls for recreational, utility vehicles

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From: Top Class Actions <topclassactionsstaff@topclassactions.com>
Sent: Friday, November 29, 2024 7:08 AM
To:
Subject: NEC lawsuit, Tuna settlement, Debt relief investigations, and more!

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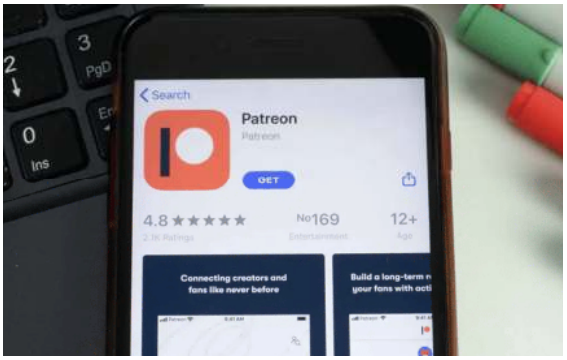


NEC lawsuit: baby formula and necrotizing enterocolitis



Time is running out to submit a claim in the $27.5M Thomson Reuters Clear privacy class action settlement

Settlements 🤝



$7.25M Patreon VPPA class action settlement



$152.2M tuna antitrust class action settlement



$19M Fisher-Price Rock N' Play class action settlement



EpiPen class action settlement website is active

Money & Consumer Products



Have you used Freedom Debt Relief, National Debt Relief or another debt consolidation or debt settlement company?



Debt collection lawsuit investigation: Chase Bank, Credit One, American Express, Wells Fargo, Synchrony, Comenity, Navient, and others



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From: Top Class Actions <topclassactionsstaff@topclassactions.com>
Sent: Tuesday, December 3, 2024 7:11 AM
To:
Subject: Last chance settlement claim plus Netflix, VW, & Kraft class actions!

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Featured Settlement ⬇



Last chance to submit a CLEAR class action settlement claim!

Latest Class Actions NEW



Cellphone wrong-number robocalls could be worth $500-$1,500 per violation of the federal TCPA

Have you received a recorded voice message on your cell phone that was intended for someone other than you?

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Uber, Lyft driver sexual assault lawsuit claim review

Uber received nearly 6,000 reports of serious sexual assault in 2017 and 2018 combined, according to a safety report the rideshare company released in early December 2019. That number includes both riders and drivers as those who reported assault.

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Birth injury lawsuit investigation

Did your child suffer from a physical injury during birth? Was the injury the result of medical malpractice?

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Latest Settlements 🤝



Netflix customers file class action over Tyson-Paul streaming issues

Consumers who tuned in to watch Jake Paul fight Mike Tyson in a boxing match on Netflix this month missed large portions or the entirety of the fight due to streaming glitches and buffering issues, a new class action lawsuit alleges.

Learn More



Volkswagen issues recalls, faces class actions

Volkswagen recently issued a trio of recalls. Consumers also targeted the automaker with a pair of class action lawsuits.

Learn More



Kraft mac & cheese class action over artificial preservatives to move forward

An Illinois federal judge declined to throw out a class action lawsuit filed against The Kraft Heinz Co. and Kraft Heinz Ingredients Corp. over claims the company falsely marketed a variety of macaroni and cheese products as free of artificial flavors, preservatives and dyes.

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Sign up now!



California National General Insurance Class Action Lawsuit Investigation



Vaccine injury compensation available for shoulder injuries (SIRVA)



Have you used Freedom Debt Relief, National Debt Relief or another debt consolidation company?

MORE LAWSUITS TO JOIN



MESSAGE FROM SCOTT HARDY

Happy Tuesday, my friends! I hope you had a fantastic Thanksgiving holiday! We did! Somehow, after two weeks on the road (and 4 pounds more on the scale), I got back down to my target weight over the weekend. Yes, even after a delicious turkey breast, stuffing, mashed potatoes and gravy meal my beautiful bride made on Thursday. Now, my biggest challenge, like many of you, is the holiday treats. My BB was busy making treats for the neighbors and I had to try them. Unlike previous years, I kept my sampling to one treat each! Rest assured, they were delicious! I'll have to add a little speed to my walk in the morning to work it out LOL. Here's a shot of one of the tins Aubrey and I dropped off to a neighbor.



Work-wise, the whole team had Thursday and Friday off. I actually did my best to enjoy time with the family so I only worked a few hours each day of the long

weekend. I'm writing this to you on Sunday, catching up before things get hectic in the morning.

That's all for now! Make it a **great** week!

Settlements Closing Soon



DaVita data privacy

Potential Award: TBD
Deadline: 12/4/2024

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Progressive Michigan total loss

Potential Award: Varies
Deadline: 12/6/2024

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Jefferson Dental TCPA

Potential Award: $57
Deadline: 12/9/2024

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Exhibit I

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1 WEEK LEFT
Class Action Settlement



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1 WEEK LEFT
Class Action Settlement



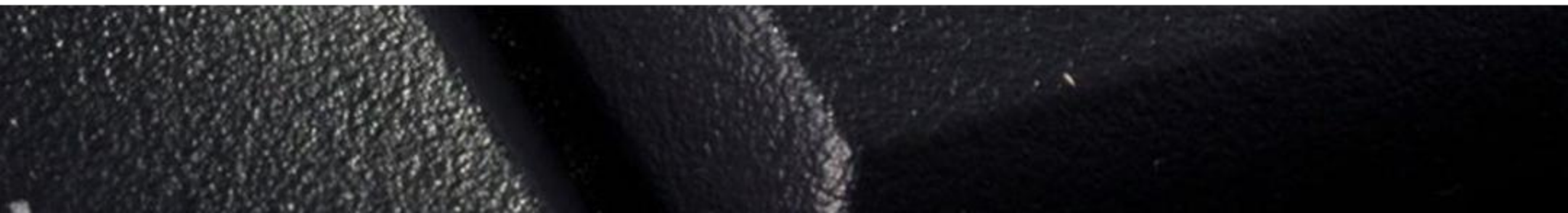
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6 DAYS LEFT

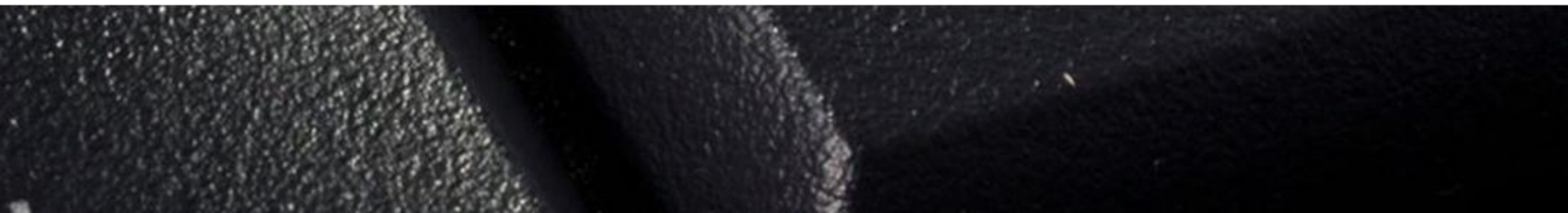
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4 DAYS LEFT

Class Action Settlement



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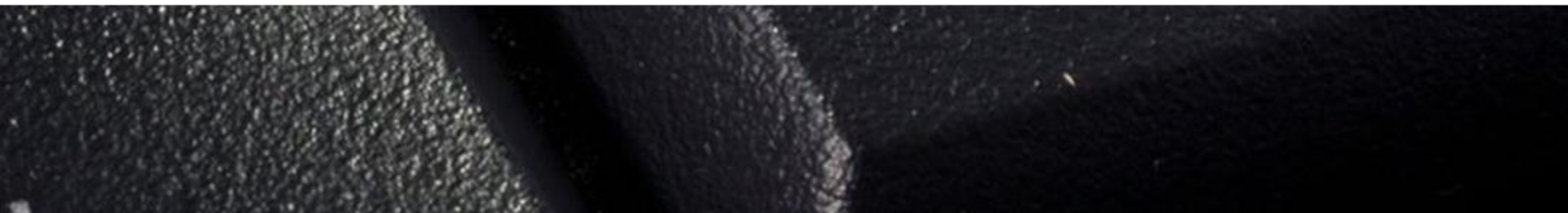
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Exhibit J

Settlement Administrator Angeion Group announces that December 27, 2024, is the Deadline in the $27.5 Million Class Action Settlement With Thomson Reuters

NEWS PROVIDED BY
Angeion Group →
Dec 09, 2024, 09:01 ET

Deadline for Filing a Claim is December 27, 2024

PHILADELPHIA, Dec. 9, 2024 /PRNewswire/ -- Californians eligible to file a claim in the $27.5 million class action settlement with Thomson Reuters are running out of time to act. Claimants will receive payments estimated to fall between $20 and $50, depending on the number of claims submitted. The deadline to file a claim is **December 27, 2024**, leaving only weeks to participate.

The settlement resolves allegations that Thomson Reuters improperly collected and sold Californians' personal information without their consent. Those eligible include Californians whose data was sold through the company's product, CLEAR between December 3, 2016, and October 31, 2024.

Who is included in the Settlement? You are included if you resided in California for any period of time between December 3, 2016, and October 31, 2024, and were 18 years old (or older) during that time.

You do not need to have a CLEAR account or have used CLEAR to qualify.

Submitting a claim is simple and can be done online or via mail.

To submit your claim, go to: **www.clearprivacysettlement.com/submit-claim**

The deadline to file a valid Claim is **December 27, 2024**.

"This settlement represents an important step toward protecting consumer privacy," said the legal team from Gibbs Law Group and Cohen Milstein. "We encourage all eligible Californians to file their claims before it's too late."

How Do I Get More Information? This Notice is only a summary. For more information, including the full notice, claim form and Settlement Agreement visit **www.clearprivacysettlement.com** or call **1-855-969-4049.**

Don't miss your chance to receive compensation. Act today!

Media Contact:
Angeion Group
Shiri Lasman
(215) 563-4116

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GET STARTED

440k+
Newsrooms & Influencers

9k+
Digital Media Outlets

270k+
Journalists Opted In

Exhibit K

Script: ClearPrivacySettlement x @TheLawyerAngela 12.4.2024

If you have ever lived in California, this message is for you…you could get $19 to $48.

Send this to all your California friends,
even those who've moved away,
this class action covers any adult who lived in California for any period of time *between December 3, 2016 and October 31, 2024.*
(Show on screen: December 3, 2016 - October 31, 2024)

Thomson Reuters is an AI technology company that is settling a class action lawsuit accusing it of making data about Californians available for sale without their consent via CLEAR.

You can get money if you resided in California for any amount of time in the past eight years. That's it. You don't need a CLEAR account or anything else.

The form is quick and easy, only requiring your basic contact info, your payment method and signature—and it's all confidential

The settlement estimates you'll get back between $19 and $48.

Go to ClearPrivacySettlement.com,
(Show on screen: ClearPrivacySettlement.com)

and take 10 seconds to do it NOW because you only have until December 27, 2024!
(Show on screen: Claim Deadline: December 27, 2024*)*

Exhibit L


CLEAR Privacy Settlement
Did you reside in California between December 3, 2016, and October 31, 2024?
www.clearprivacysettlement.com


CLEAR Privacy Settlement
You can get an estimated
$48*
from a Class Action Settlement
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CLEAR Privacy Settlement
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Exhibit M

EXCLUSION LIST

COUNT	FIRST NAME	LAST NAME
1	AARON	AARON
2	MARIA	ACOSTA
3	AMY	AHRENDT
4	MARIA	BANDA
5	AN	BARRY
6	PAUL	BONIN
7	AKITA	BOOKER
8	ROGER	BOYD
9	ALEXEI	BROWN
10	LEONARDO	CABRAL
11	MICHAEL	CHING
12	SYLVIA	CHING
13	SYLVIA	COLLINS
14	JAMIE	DAVIS
15	YIFAN	DENG
16	STEVEN	DEY
17	LOGUN	FAGUNDES
18	JOHN	GAINES
19	LEONIDAS	GELALIS
20	VANESSA	HERNANDEZ
21	DENNIS	HIGGS
22	CORAL	HUEY
23	EWELINA	JASNOWSKA
24	DAVID	JESSUP
25	ROSS	JORDAN
26	ATHENA	KOHISTANI
27	MONICA	LAMBERT
28	ELIZABETH	LIAO
29	STEPHANIE	LOWELL
30	AGNES	LUMSDAINE
31	MARYNA	MAKHOVA
32	JAMES	MARTINEZ
33	MICHAEL	MCCOWAN
34	JAMES	MEYER
35	ANNA	MILLER
36	LISA	MONROE
37	JEFFREY	PARK
38	BHAWANA	SCAER
39	JEREMY	SCOTT
40	BENJAMIN	SLAVENS

41	ASHLEY	SOLIS
42	DOUGLAS	SPECK
43	ROBERT	STONE
44	JOSEPH	STUBE
45	MEGAN	TOBENER
46	LAI	TRUST
47	SCOTT	WORSLEY
48	RUTHY	YAMAMOTO
49	RUXIN	YI
50	TRENT	JASON