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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: STATUS OF CLAIMS FILING

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. My credentials were provided in my previous declaration describing the Notice Plan ("Notice Plan Declaration") (Dkt. No. 241-2).

3. The purpose of this declaration is to provide the Court with an update on the status of claims filing in relation to this Court's Order Granting Preliminary Approval of Class Action Settlement (Dkt. No. 259) ("Order") and the Class Action Settlement Agreement (Dkt. No. 241-1) ("Agreement").

4. In connection with Plaintiffs' Motion for Final Approval, Angeion reported the status of claims filed as of January 8, 2025 (Dkt. No. 273-2 at ¶¶ 41-43). In that Declaration, I noted that Angeion's "fraud review is ongoing" and that certain claims remained pending validation and fraud review (*Id.*).

5. As of January 29, 2025, that review is complete. The following table reflects the updated status of claims.

Claims received	752,034 (750,439 electronic, 1,595 paper)
Claims validated for approval	125,302
Claims blocked as submitted by software applications (bots)	22.9 million
Opt outs received by deadline	50 (49 electronic, 1 paper)
Opt outs received after deadline	0
Objections by deadline	0
Objections after the deadline	0

6. These figures yield a claims rate of approximately **0.313%** and an estimated per-claimant recovery of **$154.59** for each participating claimant.

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

Dated: January 30, 2025

STEVEN WEISBROT