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*Attorneys for Plaintiffs and the Certified Class*

**UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

CAT BROOKS and RASHEED  
SHABAZZ, individually and on behalf  
of all others similarly situated,

Plaintiffs,

v.

THOMSON REUTERS CORPORATION,  
  
Defendant.

Case No. 3:21-cv-01418-EMC-KAW

**PLAINTIFFS' REPLY SUPPORTING  
MOTION FOR FINAL APPROVAL OF  
CLASS ACTION SETTLEMENT**

Date: February 21, 2025

Time: 9:00 a.m.

Place: Courtroom 5, 17th Floor

Judge: Hon. Edward M. Chen

1 Plaintiffs submit this reply to provide an update from the Settlement Administrator on  
2 claims processing and fraud review.

3 In their Motion for Final Approval, Plaintiffs reported that the Settlement Administrator  
4 had preliminarily validated 134,325 claims to receive money out of the settlement fund. ECF  
5 No. 273-2 at ¶¶ 41-43. 46,493 claims remained pending validation and fraud review by the  
6 Settlement Administrator. *Id.* Plaintiffs can now report that the Settlement Administrator  
7 completed that validation and fraud review process on January 29, 2025, and has concluded  
8 that the final claims count is 125,302. Declaration of Steven Weisbrot at ¶ 5. Accordingly, the  
9 Settlement Administrator reports that the response rate is 0.313%, and the per-claimant  
10 recovery is approximately \$154.59. *Id.*

11 For the reasons discussed in Plaintiffs' Motion for Final Approval, these figures are  
12 within the range that Courts find acceptable, and the settlement should be finally approved as  
13 fair, reasonable, and adequate. ECF No. 273 at 17-18.

14  
15 DATED: January 30, 2025

Respectfully submitted,

16 /s/ Andre M. Mura

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