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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

STIPULATION AND [PROPOSED] ORDER TO EXTEND TIME TO FILE POST-DISTRIBUTION ACCOUNTING

Judge: Hon. Edward M. Chen

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

Whereas, on February 21, 2025, the Court granted Plaintiffs' Motion for Final Approval of Class Action Settlement, ECF No. 280, and set a hearing for post-distribution accounting on August 26, 2025, with a status report due on August 12, 2025, ECF No. 278;

Whereas, the Court-appointed Settlement Administrator, Angeion Group, has been distributing settlement funds to the Class pursuant to the Court's Final Approval Order;

Whereas, the Parties provide this update to the Court regarding the distributions to date, and based on information from Angeion Group, request a short extension of time to file the post-distribution accounting;

Whereas, on April 15, 2025, Angeion Group mailed checks to class members who elected to receive physical checks in their claim forms;

Whereas, on April 22, 2025, Angeion Group sent out digital payments to class members who elected to receive digital payments in their claim forms;

Whereas, a small percentage of class members elected to receive digital payments, but had issues receiving their selected payment method (for example, they used an old account number), and Angeion Group worked with these class members to get an updated payment method selected by June 19, 2025;

Whereas, on June 20, 2025, Angeion sent out the "second chance" digital payments for those class members who provided updated payment information and chose to receive digital payments through E-Mastercard, ACH or Zelle;

Whereas, on June 30, 2025, Angeion sent out the "second chance" digital payments for those class members who provided updated payment information and chose to receive digital payments through PayPal or Venmo;

Whereas, on July 3, 2025, Angeion reissued "second chance" paper checks to class members who had selected paper checks in their original claim form, but had that check returned (such as for an invalid address) or did not cash the checks within the initial 30-day void period, and, upon follow-up from Angeion, the class member either chose to receive a second paper check or did not select a new digital method for their second chance payment;

Whereas, if any of the class members who selected a digital second chance payment experience a second payment failure, Angeion will issue those class members a paper check on or around September 4, 2025, which will be valid for 30 days (until on or around October 4, 2025);

Whereas, at that time, Angeion will be able to complete a full reconciliation of the distribution of settlement funds;

IT IS HEREBY STIPULATED AND AGREED, subject to the Court's approval, that the August 26 hearing on post-distribution accounting be vacated and rescheduled for November 4, 2025, at 2:30 pm, with a post-distribution accounting report to be filed two weeks prior (by October 21, 2021).

DATED: August 4, 2025

GIBBS LAW GROUP LLP

Respectfully submitted,

/s/ *Andre M. Mura*

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DATED: August 4, 2025

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By: */s/ Susan D. Fahringer*

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[PROPOSED] ORDER

PURSUANT TO STIPULATION, the August 26 hearing on post-distribution accounting is vacated and rescheduled for November 4, 2025, at 2:30 pm, with a post-distribution accounting report to be filed two weeks prior (by October 21, 2021).

DATED: _____

_____
The Hon. Edward M. Chen
United States District Judge

ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from the other signatory.

/s/ Andre M. Mura