

EXHIBIT 2



October 22, 2025

The Honorable Edward M. Chen
United States District Court for the Northern District of California
450 Golden Gate Avenue, San Francisco, CA 94102
RE: Brooks v. Thomson Reuters Corp., Case No. 3:21-cv-01418-EMC

Dear Judge Chen,

Consumer Reports (CR) is an independent, nonprofit, and nonpartisan organization dedicated to creating a fair and just marketplace for all. For nearly ninety years, we have empowered consumers by combining research and testing, investigative journalism, consumer education, and effective advocacy. From seatbelts to standards for toxin-free baby-food, many of the safeguards in the marketplace we take for granted are the result of CR's work.

CR's Capacity and Work on Privacy

CR is the largest and most trusted consumer organization in the nation with laboratories, journalists, and policy teams focused on many issues including data privacy, digital rights, and financial fairness. Our work in the privacy space—especially within California—has contributed to the advancement of consumer protections in the digital marketplace. CR has played a central role in the passage, implementation, and enforcement of the California Consumer Privacy Act (CCPA). Recently, we [co-sponsored](#) the California Location Privacy Act, legislation that would create commonsense protections around the collection and use of consumers' precise geolocation data, including banning the sale of it outright. We help California residents exercise their data rights through [Permission Slip](#), our free app through which consumers can send hundreds of companies legally enforceable requests to stop selling or delete their data. We also coordinate [Global Privacy Control](#), a browser signal, legally binding in California, that informs websites of a user's privacy preferences.

CR's Approach to Cy Près Awards

Consumer Reports strongly supports the principle that settlements in class action cases should, whenever feasible, provide direct compensation to affected consumers. When direct distribution is not possible, however, we accept cy-près awards as an appropriate mechanism to advance the interests of the class and consumers in the marketplace.

Since the early 1980s, CR has managed more than sixty-five cy-près awards. These funds have enabled us to educate, engage, and protect consumers in ways that complement the goals of the underlying litigation. Through careful stewardship, we ensure that every cy-près award we receive is used to deliver benefits aligned with the intent of the settlement and the interests of the affected class.



Representative Cases

CR has previously been designated as a cy-près recipient in several significant privacy and consumer protection cases, including:

- **Thomas H. Krakauer v. Dish Network LLC**, Case No. 1:14-cv-00333-CCE-JEP (U.S. Court of Appeals for the Fourth Circuit, 2019). The Honorable Catherine C. Eagles of the Middle District of North Carolina presided. The case resulted in a judgment exceeding \$60 million under the Telephone Consumer Protection Act (TCPA). CR was approved as one of the cy-près recipients as part of a competitive process. Our work focuses on increasing privacy protections such that telemarketers do not have access to the data required to target consumers.
- **Google LLC Street View**, Case No. 3:10-md-02184 (N.D. Cal. Mar. 18, 2020). The Honorable Charles R. Breyer presided over a \$13 million settlement concerning allegations of unauthorized data collection from Wi-Fi networks. Through a competitive process, CR received a cy-près award to support consumer research, public awareness, and advocacy on data collection and privacy practices.
- **James Cottle, et al. v. Plaid Inc.**, Case No. 20-cv-03056-DMR (N.D. Cal. July 20, 2022). The Honorable Donna M. Ryu approved a \$58 million settlement arising from allegations that Plaid collected and used consumer financial data without consent. CR was named a cy-près recipient for its work on data privacy education and advocacy.

Other cy-près awards of the last five years include:

- **Johns v. Visa (CA)** — California Court of Appeal, First Appellate District (underlying JCCP 4335, San Francisco Superior Court).
- **Visa/Mastercard credit-debit card litigation** — U.S. District Court, Eastern District of New York (MDL 1720; Payment Card Interchange Fee & Merchant Discount Antitrust Litigation).
- **Pool Products Distribution Market Antitrust Litigation** — U.S. District Court, Eastern District of Louisiana (MDL 2328).
- **Robrinzine v. Big Lots Stores, Inc.** — U.S. District Court, Northern District of Illinois.
- **Mollicone v. Universal Handicraft, Inc.** — U.S. District Court, Southern District of Florida.
- **Ramos v. Hopele of Fort Lauderdale, LLC** — U.S. District Court, Southern District of Florida (Fort Lauderdale Division).



- **Koller v. Deoleo USA, Inc.** — U.S. District Court, Northern District of California (No. 3:14-cv-02400-RS).
- **Cortes v. National Credit Adjusters, LLC** — U.S. District Court, Eastern District of California (No. 2:16-cv-00823-MCE-EFB).
- **Will Kaupelis et al. v. Harbor Freight Tools USA, Inc.** — U.S. District Court, Central District of California (No. 8:19-cv-01203).
- **Jane Loomis v. Slendertone Distribution, Inc.** — U.S. District Court, Southern District of California (No. 3:19-cv-00854).
- **Vanover v. Helio LLC** — Superior Court of California, County of Los Angeles (Case No. BC414842).
- **Richard Desio et al. v. InSinkErator et al.** — U.S. District Court, Eastern District of Washington (No. 2:15-cv-00346).
- **Bechtel and Thoennes v. Sole Fitness (Fitness Equipment Services, LLC d/b/a Sole Fitness)** — U.S. District Court, Southern District of Ohio, Western Division (No. 1:19-cv-00726).
- **Keurig (K-Cups) Settlement** — U.S. District Court, Northern District of California (Smith v. Keurig Green Mountain, Inc., No. 4:18-cv-06690-HSG).
- **Woodard et al. v. Labrada** — U.S. District Court, Central District of California (No. 5:16-cv-00189-JGB-SP).
- **Walker v. Nautilus, Inc.** — U.S. District Court, Southern District of Ohio, Eastern Division (No. 2:20-cv-3414; Judge Edmund A. Sargus, Jr.).

Through each of these awards, CR's has managed funds to support initiatives that protect consumer interests.

Conflicts of Interest

Consumer Reports has no significant relationships with any of the individuals associated with this case including plaintiffs, defendants, counsel, and judicial representatives.



Summary

We appreciate the Court's consideration of Consumer Reports as a cy-près recipient for residual funds from Brooks v. Thomson Reuters Corp., Case No. 3:21-cv-01418-EMC. We are committed to ensuring that these funds are used to achieve outcomes consistent with the objectives of the litigation—benefiting consumers and promoting fair and transparent market practices through consumer-facing tools that help Californians exercise their privacy rights; policy and regulatory work aimed at data brokers; and research, public education, and watchdog reporting on broker practices.

Respectfully submitted,

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