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Attorneys for Plaintiffs and the 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

DECLARATION OF ANDRE M. MURA IN SUPPORT OF PLAINTIFFS' ADMINISTRATIVE MOTION TO FILE UNDER SEAL

Hon. Edward M. Chen

I, Andre M. Mura, declare under penalty of perjury:

1. I am a member in good standing of the Bar of California and the bar of this Court. I am a partner at Gibbs Mura LLP in Oakland, California, and represent Class Plaintiffs in this matter.

2. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently to them.

3. I submit this declaration in support of Plaintiffs' Administrative Motion to File Under Seal.

4. At the November 4 status conference, the Court asked settlement administrator Angeion to prepare a declaration and associated materials for the Court's and counsel's review. ECF 290.

5. On November 12, Angeion emailed those materials to Class Counsel and requested that Class Counsel file them under seal. Pursuant to Local Rule 79-5, Class Counsel hereby files the following materials provisionally under seal:

Document	Portion of Document
Weisbrot Decl.	¶¶ 56-80, 84
Exhibit 1	Entire document
Exhibit 2	Entire document
Exhibit 3	Entire document
Exhibit 4	Entire document
Exhibit 5	Entire document

I declare under penalty of perjury that the foregoing is true and correct. Executed on November 13, 2025.

/s/ Andre M. Mura
Andre M. Mura