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Thomson Reuters Corporation

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

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

Plaintiffs,

v.

THOMSON REUTERS CORPORATION,
Defendant.

Case No. 4:21-cv-1418-KAW

**STIPULATION TO EXTEND TIME FOR
DEFENDANT TO RESPOND TO
COMPLAINT PURSUANT TO LOCAL
RULE 6-1(a)**

Current Response Date: March 5, 2021

New Response Date: April 5, 2021

Pursuant to Federal Rule of Civil Procedure 6(b) and Civil Local Rule 6-1(a), Defendant Thomson Reuters Corporation (“Thomson Reuters”) and Plaintiffs Cat Brooks and Rasheed Shabazz (“Plaintiffs”), by and through their respective counsel, hereby stipulate as follows:

1 WHEREAS, Plaintiffs filed the Complaint on or about December 3, 2020 (“Complaint”);

2 WHEREAS, on January 29, 2021, Plaintiffs effected service of process of the summons
3 and Complaint on Thomson Reuters America Corporation as the “general manager in this state”
4 for Thomson Reuters;

5 WHEREAS, Thomson Reuters removed the case to federal court on February 26, 2021;

6 WHEREAS, the deadline to answer or otherwise respond to the Complaint is March 5,
7 2021;

8 WHEREAS, Thomson Reuters has requested, and Plaintiffs have consented to, an
9 additional 30 days for Thomson Reuters to answer or otherwise respond to the Complaint;

10 WHEREAS, good cause exists for the agreed extension due to the complexity of the
11 underlying facts and the fact that defense counsel requires additional time to become
12 knowledgeable about the case to prepare an initial pleading;

13 WHEREAS, the requested extension will not affect any of the other dates set in the case;

14 NOW, THEREFORE IT IS HEREBY STIPULATED by and between the parties, through
15 their respective counsel, that Thomson Reuters shall answer or otherwise respond to the
16 Complaint by April 5, 2021.

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1 DATED: _____, 2021

PERKINS COIE LLP

2 By: _____

3 Susan D. Fahringer, Bar No. 162978
4 SFahringer@perkinscoie.com

5 Attorneys for Defendant
6 Thomson Reuters Corporation

7 DATED: _____, 2021

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ATTESTATION

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

/s/ Susan D. Fahringer
Susan D. Fahringer