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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

RICHARD KADREY, et al., Individual and Representative Plaintiffs, v. META PLATFORMS, INC., Defendant.	Case No. 3:23-cv-03417-VC Related Cases: No. 3:25-cv-09579-VC (*already related*) No. 3:26-cv-02333-VC (*already related*) No. 3:26-cv-03725-VC (*already related*) No. 3:26-cv-04053-VC (*already related*) **PLAINTIFFS' ADMINISTRATIVE MOTION TO CONSIDER WHETHER CASES SHOULD BE RELATED (L.R. 3-12, 7-11)**

TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that a related case, *Sullivan et al. v. Meta Platforms, Inc.*, Case No. 4:26-cv-06793-KAW ("*Sullivan*"), was filed on July 2, 2026, in the United States District Court of the Northern District of California. Pursuant to Local Rule 3-12(b) and 7-11 of the United States District Court for the Northern District of California, Plaintiffs submit this Administrative Motion because Case No. 4:26-cv-06793-KAW is related, as defined by Local Rule 3-12(a), to *Kadrey v. Meta Platforms, Inc.*, No. 3:23-cv-03417-VC ("*Kadrey*"), *Entrepreneur Media, LLC v. Meta Platforms, Inc.*, No. 3:25-cv-09579-VC ("*Entrepreneur Media*"), *Chicken Soup for the Soul, LLC v. Meta Platforms, Inc.*, No. 3:26-cv-02333-VC ("*Chicken Soup*"), *Cambronne et al. v. Meta Platforms, Inc.*, No. 3:26-cv-03725-VC ("*Cambronne*"), and *Cognella, Inc. v. Meta Platforms, Inc.*, No. 3:26-cv-04053-VC ("*Cognella*").

I. Applicable Standard Under Civil L.R. 3-12

Under Civil Local Rule 3-12, an action is related to another when:

1. The actions concern substantially the same parties, property, transaction, event, or question of law; and

2. It appears likely that there will be an unduly burdensome duplication of labor and expense or conflicting results if the cases are conducted before different Judges. Civil L.R. 3-12(a).

An Administrative Motion to Consider Whether Cases Should be Related must contain: "(1) The title and case number of each apparently related case; (2) A brief statement of the relationship of the actions according to the criteria set forth in Civil L.R. 3-12(a)."

II. Related Cases

The cases are related in each of the following respects:

1. The Defendant is common in all of the above-noted cases.

2. By and large, the factual allegations and legal claims in all of the above-noted cases are overlapping. Plaintiffs in these cases allege that Defendant, a developer of commercial large language models ("LLMs"), downloaded and used Plaintiffs' copyrighted works, without consent or authorization, in the development, training, fine-tuning, and deployment of its LLMs. Plaintiffs in

these cases allege that Defendant relied on pirate libraries and pirated datasets in its scheme to use Plaintiffs' copyrighted works without authorization.

3. Accordingly, given the overlapping nature of these cases (including defendant, factual allegations, and causes of action), an assignment to a single judge is likely to conserve judicial resources and promote the most efficient determination of the actions.

Plaintiffs note that Plaintiffs in *Sullivan* are unique and distinct from plaintiffs in *Kadrey, Entrepreneur Media, Chicken Soup, Cambronne, and Cognella*, who are trade book authors or trade book and textbook publishers, because Plaintiffs in *Sullivan* are textbook authors. Textbooks typically have regular revision cycles and occupy a market that is fundamentally different from the trade book market, which consists of people who choose to purchase books for personal reasons and will not accept a substitute by another author or generated by an LLM. In the textbook market, by contrast, because the person who chooses the textbook is not the same person who is required to purchase it, the purchaser has a powerful incentive to avoid the cost of purchasing a textbook if a "free" version can be found via an LLM. These differences, among others, between Plaintiffs in *Sullivan* and plaintiffs in *Kadrey, Entrepreneur Media, Chicken Soup, Cambronne, and Cognella* will necessitate additional discovery and motion practice by Plaintiffs in Sullivan despite the relatedness between all of the cases.

III. Conclusion

For the reasons set forth above, Plaintiffs respectfully request that the Court enter an order relating *Sullivan et al. v. Meta Platforms, Inc.*, Case No. 4:26-cv-06793-KAW, to *Kadrey v. Meta Platforms, Inc.*, No. 3:23-cv-03417-VC, *Entrepreneur Media, LLC v. Meta Platforms, Inc.*, No. 3:25-cv-09579-VC, *Chicken Soup for the Soul, LLC v. Meta Platforms, Inc.*, No. 3:26-cv-02333-VC, *Cambronne et al. v. Meta Platforms, Inc.*, No. 3:26-cv-03725-VC, and *Cognella, Inc. v. Meta Platforms, Inc.*, No. 3:26-cv-04053-VC.

Date: July 14, 2026

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