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**UNITED STATES DISTRICT COURT**
**NORTHERN DISTRICT OF CALIFORNIA**
**SAN JOSE DIVISION**

CONCORD MUSIC GROUP, INC., ET AL.,

Plaintiffs,

vs.

ANTHROPIC PBC,

Defendant.

Case No. 5:24-cv-03811-EKL

**DEFENDANT ANTHROPIC PBC'S ADMINISTRATIVE MOTION TO CONSIDER WHETHER ANOTHER PARTY'S MATERIAL SHOULD BE SEALED IN CONNECTION WITH ANTHROPIC'S OPPOSITION TO PLAINTIFFS' RENEWED MOTION FOR PRELIMINARY INJUNCTION**

Hon. Eumi K. Lee

Pursuant to Civil Local Rules ("L.R.") 7-11 and 79-5(f) and in accordance with the Stipulated Protective Order (ECF No. 62), Defendant Anthropic PBC ("Anthropic") respectfully submits this Administrative Motion to Consider Whether Another Party's Material Should Be Sealed ("Motion") in connection with Anthropic's Opposition to Plaintiffs' Renewed Motion for Preliminary Injunction ("Opposition") and accompanying declarations in support thereof (collectively, the "Sealed Documents") filed concurrently herewith. Anthropic has reviewed and complied with L.R. 79-5(f).

The Sealed Documents subject to this Motion are:

| **ECF No.** | **Document** | **Portion(s) to Seal** | **Reason for Sealing** |
|---|---|---|---|
| ECF No. 213-2 | Peterson Declaration | Highlighted portion at ¶ 42 | Describes document designated by Plaintiffs as Highly Confidential – Attorneys' Eyes Only. |
| ECF No. 213-3 | Hall Declaration | Highlighted portions at ¶¶ 19, 31, 57 | Describes documents designated by Plaintiffs as Highly Confidential – Attorneys' Eyes Only. |

As set forth above, the Sealed Documents contain citations to and descriptions of documents designated as "Highly Confidential – Attorneys' Eyes Only" by Plaintiffs pursuant to the Stipulated Protective Order entered in this case in the Middle District of Tennessee (ECF No. 62). Other than as separately indicated in Anthropic's separate sealing motion for these documents (ECF No. 212), Anthropic does not have an interest in sealing the above information and takes no position on whether the information so designated is confidential or otherwise entitled to redaction, but submits this Administrative Motion in order to comply with the Stipulated Protective Order and L.R. 79-5(f). The Sealed Documents will be submitted provisionally under seal with this Administrative Motion, subject to Defendants' filing of a statement and/or declaration pursuant to L.R. 79-5(f)(3).

Dated: August 22, 2024

LATHAM & WATKINS LLP

Respectfully Submitted,

By: */s/ Brittany N. Lovejoy*

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