OPPENHEIM + ZEBRAK, LLP
Matthew J. Oppenheim
Nicholas C. Hailey
Audrey L. Adu-Appiah
(admitted *pro hac vice*)
4530 Wisconsin Ave., NW, 5th Floor
Washington, DC 20016
Telephone: (202) 480-2999
matt@oandzlaw.com
nick@oandzlaw.com
aadu-appiah@oandzlaw.com

Jennifer Pariser
Andrew Guerra
Timothy Chung
(admitted *pro hac vice*)
461 5th Avenue, 19th Floor
New York, NY 10017
Telephone: (212) 951-1156
jpariser@oandzlaw.com
andrew@oandzlaw.com
tchung@oandzlaw.com

COBLENTZ PATCH DUFFY & BASS LLP
Jeffrey G. Knowles (SBN 129754)
One Montgomery Street, Suite 3000
San Francisco, CA 94104
Telephone: (415) 391-4800
ef-jgk@cpdb.com

COWAN, LIEBOWITZ & LATMAN, P.C.
Richard S. Mandel
Jonathan Z. King
Richard Dannay
(admitted *pro hac vice*)
114 West 47th Street
New York, NY 10036-1525
Telephone: (212) 790-9200
rsm@cll.com
jzk@cll.com
rxd@cll.com

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

CONCORD MUSIC GROUP, INC., ET AL.,

Plaintiffs,

v.

ANTHROPIC PBC,

Defendant.

Case Number: 5:24-cv-03811-EKL

PLAINTIFFS' ADMINISTRATIVE MOTION TO CONSIDER WHETHER ANOTHER PARTY'S MATERIAL SHOULD BE SEALED

Hon. Eumi K. Lee

Pursuant to Civil Local Rules 7-11 and 79-5(f), Plaintiffs respectfully submit this Administrative Motion to Consider Whether Another Party's Material Should Be Sealed in connection with Plaintiffs' Reply in Support of the Motion for Preliminary Injunction ("Reply Brief") and the supporting Declarations of Ben Y. Zhao ("Zhao Decl.") and Michael D. Smith

("Smith Decl.") (collectively, the "Sealed Documents"), filed in support of Plaintiffs' Reply in Support of the Motion for Preliminary Injunction, ECF No. 225.

The following portions of the Reply Brief, Zhao Decl., and Smith Decl., reference or discuss Defendant Anthropic PBC's ("Anthropic") documents filed under seal or produced by Anthropic under a "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY" designation:

ECF No.	Document	Portion(s) to Seal	Granted/Denied
ECF No. 230-2	Reply Brief	Highlighted portions at: pp. i, 15.	
ECF No. 230-3	Smith Decl.	Highlighted portions at: ¶ 28.	
ECF No. 230-4	Zhao Decl.	Highlighted portions at: ¶¶ 6–8, 11–12, 14.	

Publishers do not take any position on whether the information so designated is confidential or entitled to sealing or redaction. Publishers bring this motion for the purpose of complying with the Parties' Stipulated Protective Order entered in this case in the Middle District of Tennessee, ECF No. 62, and the Civil Local Rules of this District. Accordingly, the Sealed Documents will be submitted provisionally under seal or redacted with this Administrative Motion, subject to Anthropic's filing of a statement and/or declaration pursuant to Civil L.R. 79-5(f)(3).

Dated: September 12, 2024

Respectfully submitted,

/s/ Timothy Chung

OPPENHEIM + ZEBRAK, LLP
Matthew J. Oppenheim
Nicholas C. Hailey
Audrey L. Adu-Appiah
(admitted *pro hac vice*)
4530 Wisconsin Ave., NW, 5th Floor
Washington, DC 20016
Telephone: (202) 480-2999
matt@oandzlaw.com
nick@oandzlaw.com
aadu-appiah@oandzlaw.com

Jennifer Pariser
Andrew Guerra
Timothy Chung
(admitted *pro hac vice*)
461 5th Avenue, 19th Floor
New York, NY 10017
Telephone: (212) 951-1156
jpariser@oandzlaw.com
andrew@oandzlaw.com
tchung@oandzlaw.com

COBLENTZ PATCH DUFFY & BASS LLP
Jeffrey G. Knowles (SBN 129754)
One Montgomery Street, Suite 3000
San Francisco, CA 94104
Telephone: (415) 772-5795
jknowles@coblentzlaw.com

COWAN, LIEBOWITZ & LATMAN, P.C.
Richard S. Mandel
Jonathan Z. King
Richard Dannay
(admitted *pro hac vice*)
114 West 47th Street
New York, NY 10036-1525
Telephone: (212) 790-9200
rsm@cll.com
jzk@cll.com
rxd@cll.com

Attorneys for Plaintiffs