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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-SVK **JOINT STIPULATION AND [PROPOSED] ORDER TO EXTEND CASE DEADLINES** **CIV. L. R. 6-1, 6-2, 7-12** Judge Eumi K. Lee Magistrate Judge Susan van Keulen

Pursuant to Civil Local Rules 6-1, 6-2, and 7-12, Plaintiffs Concord Music Group, Inc.; Capitol CMG, Inc.; Universal Music Corp.; Songs of Universal, Inc.; Universal Music – MGB NA LLC; Polygram Publishing, Inc.; Universal Music – Z Tunes LLC; and ABKCO Music, Inc. and Defendant Anthropic PBC (collectively, the "Parties"), having met and conferred, hereby respectfully submit this joint stipulation and proposed order to extend the fact discovery deadline and subsequent case deadlines for both Parties as outlined below. In support of this joint stipulation and proposed order, the Parties state as follows:

WHEREAS, on November 7, 2024, the Court issued a Joint Scheduling Order, ECF No. 262 (the "Order"), which set various deadlines for discovery;

WHEREAS, under the current schedule, the close of fact discovery is set for April 14, 2025, and the current deadlines for expert discovery, dispositive motions, *Daubert* motions, and trial are set thereafter;

WHEREAS, the Parties are currently engaged in fact discovery in accordance with the case schedule deadlines, and have each begun to make rolling productions of documents in response to discovery requests, but document discovery remains ongoing, and significant documents remain to be produced in response to outstanding requests; the Parties continue to negotiate with respect to the scope of outstanding discovery and to raise certain discovery disputes before Magistrate Judge van Keulen when at an impasse; and no fact depositions have yet been noticed or scheduled;

WHEREAS, the significant demands of the case, the number and nature of the claims and defenses at issue, and the novel nature of certain issues raised will require additional time for the Parties to complete fact discovery;

WHEREAS, the Parties agree and stipulate that there is good cause to extend the current case deadlines by approximately five months in order to complete fact discovery;

WHEREAS, the Parties propose no changes to the substance or sequence of the discovery specified in the Order;

WHEREAS**,** Civil Local Rule 6-1(b) permits parties to file a stipulation seeking a court order modifying the Order's case deadlines;

WHEREAS, along with this Joint Stipulation and Proposed Order, counsel for Plaintiffs will file a declaration in compliance with Local Civil Rule 6-2;

NOW, THEREFORE, the Parties stipulate, subject to the Court's approval, that the case deadlines specified by the Order are extended as reflected in the following table.

Event	Previous Deadline	Proposed Deadline
Initial ADR Deadline	Mar. 31, 2025	June 30, 2025
Substantial Completion of Document Production for Discovery for Which Each Party Has Agreed as of Mar. 5, 2025	N/A	Apr. 23, 2025
Substantial Completion of Remaining Document Productions	N/A	July 14, 2025
Close of Fact Discovery (including all written discovery and deposition of all fact witnesses)	Apr. 14, 2025	Sept. 11, 2025
Identify and Disclose Expert Witnesses and Exchange Expert Reports	May 12, 2025	Oct. 13, 2025
Opposition Expert Reports	June 9, 2025	Nov. 6, 2025
Reply Expert Reports	July 7, 2025	Dec. 5, 2025
Depose All Expert Witnesses	Aug. 13, 2025	Jan. 26, 2026
Close of Briefing on Dispositive and/or *Daubert* Motions	Oct. 15, 2025	Mar. 30, 2026
Hearing on Dispositive and/or *Daubert* Motions	Nov. 12, 2025	Apr. 23, 2026
Joint Pre-Trial Statement	Jan. 21, 2026	July 2, 2026
Pre-Trial Conference	Feb. 4, 2026	July 15, 2026
Trial Date	Mar. 2, 2026	At the Court's convenience

Dated: March 10, 2025

By: */s/ Audrey L. Adu-Appiah*
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SIGNATURE ATTESTATION

Pursuant to Local Rule 5-1(i)(3), I hereby attest under penalty of perjury that all other signatories listed, and on whose behalf this filing is submitted, concur in the content and have authorized this filing.

Dated: March 10, 2025

/s/ Audrey L. Adu-Appiah
Audrey L. Adu-Appiah

[PROPOSED] ORDER

Pursuant to the Parties' Stipulation and Proposed Order to Extend Case Deadlines and for good cause, the Court hereby modifies the case schedule as follows.

Event	Previous Deadline	Proposed Deadline
Initial ADR Deadline	Mar. 31, 2025	June 30, 2025
Substantial Completion of Document Production for Discovery for Which Each Party Has Agreed as of Mar. 5, 2025	N/A	Apr. 23, 2025
Substantial Completion of Remaining Document Productions	N/A	July 14, 2025
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Pre-Trial Conference	Feb. 4, 2026	July 15, 2026
Trial Date	Mar. 2, 2026	At the Court's convenience

IT IS SO ORDERED.

Dated: _____, 2025

_____
THE HONORABLE EUMI K. LEE
United States District Judge