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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

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

Judge Eumi K. Lee
Magistrate Judge Susan van Keulen

Pursuant to Civil L.R. 7-11 and 79-5(f), Plaintiffs ("Publishers") respectfully submit this Administrative Motion to Consider Whether Another Party's Material Should Be Sealed in connection with the Joint Discovery Submission Regarding Dispute as to Sampling Protocol to Address Publishers' RFP Nos. 50-51 (the "Joint Discovery Submission").

Defendant Anthropic PBC ("Anthropic") has taken the position that the information discussed in the listed portions of the following documents should be filed under seal as containing "Highly Confidential—Attorneys' Eyes Only" information:

| ECF No. | Document | Portion(s) to Seal |
|---|---|---|
| ECF No. 340-2 | Joint Discovery Submission | Highlighted portions at pp 1–2; 4–7; 10. |
| ECF No. 340-3 | Declaration of Olivia Chen | Highlighted portions at ¶ 16. |

Publishers do not believe the portions of the Joint Discovery Submission or the Declaration of Olivia Chen listed above constitute "Highly Confidential—Attorneys' Eyes Only" information or warrant sealing, and Publishers intend to oppose Anthropic's sealing request, as necessary. *See Kamakana v. City & County of Honolulu*, 447 F.3d 1172, 1179 (9th Cir. 2006); *see also* Civil L. R. 79-5(a).

Nevertheless, given the position Anthropic has taken, Publishers are required to bring this motion to comply with the Parties' Stipulated Protective Order entered in this case, ECF No. 293, and the Civil Local Rules of this District. Accordingly, the Joint Discovery Submission and supporting 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 Civ. L.R. 79-5(f)(3), and Publishers' filing of a response in opposition to sealing pursuant to Civ. L. R. 79-5(f)(4).

Dated: April 30, 2025

Respectfully submitted,

*/s/ Timothy Chung*

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