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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 Local Rules 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 Parties' Joint Discovery Dispute Statement Regarding Publishers' Challenges to Anthropic's Confidentiality Designations (the "Joint Statement").

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

ECF No.	Document	Portion(s) to Seal
ECF No. 344-2	Joint Statement	Highlighted portions at pp. 2–7; 10.

Publishers do not believe the portions of the Joint Statement listed above constitute "Highly Confidential—Attorneys' Eyes Only" information or warrant sealing, including for the reasons described in the Joint Statement, and Publishers intend to oppose Anthropic's sealing request. *See Kamakana v. City & County of Honolulu*, 447 F.3d 1172, 1179 (9th Cir. 2006); *see also* Civ. 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 Statement 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: May 5, 2025

Respectfully submitted,

/s/ Timothy Chung

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