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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, which set various deadlines for discovery;

WHEREAS, on March 10, 2025, the Court entered the Joint Stipulation and Order to Extend Case Deadlines, ECF No. 305 (the "Order"), which extended various deadlines for discovery, at the Parties' joint request;

WHEREAS, under the current schedule, the close of fact discovery is set for September 11, 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, having exchanged and responded to various written discovery, completed various document productions in response to previously served document requests, and resolved various discovery disputes via meet and confer discussions and/or before Magistrate Judge van Keulen when at an impasse; however, significant document and written discovery remains ongoing, 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 the parties have engaged in scheduling discussions regarding certain depositions, but no fact depositions have yet been formally noticed or scheduled;

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

WHEREAS, Defendant's Motion to Dismiss Plaintiffs' First Amended Complaint (ECF No. 359) is set to be heard before the Court on September 3, 2025, ECF No. 395, which is one week before the current close of fact discovery on September 11, 2025; Defendant has not yet filed an Answer to Plaintiff's Complaint or First Amended Complaint; and Defendant's deadline to answer Plaintiff's First Amended Complaint will fall on some date after the current close of fact discovery, pending resolution of the Motion to Dismiss;

WHEREAS, the Parties agree and stipulate that there is good cause to extend the current case deadlines by approximately two months to complete fact discovery for the reasons described above, including the need to complete outstanding discovery;

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

WHEREAS, the Parties agree and stipulate that no new written discovery requests will be served after August 12, 2025, absent agreement of the Parties or leave of Court;

WHEREAS, the Parties agree and stipulate that all depositions must be requested by August 29, 2025, absent agreement of the Parties or leave of Court;

WHEREAS, the Parties agree and stipulate that substantial completion of production of any outstanding documents in response to all requests for production must be complete by September 22, 2025, absent agreement of the parties or leave of Court;

WHEREAS, Anthropic states that its stipulation to this scheduling extension is without prejudice to its ability to oppose any Motion for Leave to Amend brought by Publishers, which it maintains is untimely;

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 (ECF No. 305)	Proposed Deadline
Close of Fact Discovery (including all written discovery and deposition of all fact witnesses)	Sept. 11, 2025	Nov. 10, 2025
Identify and Disclose Expert Witnesses and Exchange Expert Reports	Oct. 13, 2025	Dec. 12, 2025
Opposition Expert Reports	Nov. 6, 2025	Jan. 16, 2026
Reply Expert Reports	Dec. 5, 2025	Feb. 12, 2026
Depose All Expert Witnesses	Jan. 26, 2026	Mar. 17, 2026
Close of Briefing on Dispositive and/or *Daubert* Motions	Mar. 30, 2026	May 29, 2026
Hearing on Dispositive and/or *Daubert* Motions	Apr. 29, 2026	July 8, 2026
Joint Pre-Trial Statement	July 2, 2026	Sept. 10, 2026
Pre-Trial Conference	July 15, 2026	Sept. 23, 2026
Trial Date	Aug. 17, 2026	At the Court's convenience

Dated: August 11, 2025

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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: August 11, 2025

/s/ Timothy Chung
Timothy Chung

[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 (ECF No. 305)	Proposed Deadline
Close of Fact Discovery (including all written discovery and deposition of all fact witnesses)	Sept. 11, 2025	Nov. 10, 2025
Identify and Disclose Expert Witnesses and Exchange Expert Reports	Oct. 13, 2025	Dec. 12, 2025
Opposition Expert Reports	Nov. 6, 2025	Jan. 16, 2026
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Trial Date	Aug. 17, 2026	At the Court's convenience

Further, pursuant to the Parties' stipulation:

1. No new written discovery requests may be served after August 12, 2025, absent agreement of the Parties or leave of Court;

2. All depositions must be requested by August 29, 2025, absent agreement of the Parties or leave of Court;

3. The Parties will substantially complete production of any outstanding documents in response to all requests for production by September 22, 2025, absent agreement of the parties or leave of Court.

IT IS SO ORDERED.

Dated: _____, 2025

_____

THE HONORABLE EUMI K. LEE
United States District Judge