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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 Anthropic's Custodial Searches and Productions (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. 438-1	Ex. 3: Plaintiffs' Third Set of Requests for Production of Documents and Things to Defendant	Highlighted portions at pp. 8, 10–11.
ECF No. 438-2	Ex. 5: Plaintiffs' Seventh Set of Requests for Production of Documents and Things to Defendant (Nos. 121–131)	Highlighted portions at p. 9.
ECF No. 438-3	Ex. 6: Defendant Anthropic PBC's Responses and Objections to Plaintiffs' First Set of Interrogatories (Nos. 1–16)	Highlighted portions at pp. 16–17, 21–23.

Publishers do not believe the portions of the exhibits listed above constitute "Highly Confidential—Attorneys' Eyes Only" information or warrant sealing, and Publishers reserve the right 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 documents identified above 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: September 23, 2025

Respectfully submitted,

/s/ Michelle Gomez-Reichman

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