SONAL N. MEHTA (SBN 222086)
sonal.mehta@wilmerhale.com
WILMER CUTLER PICKERING HALE AND DORR LLP
2600 El Camino Real, Suite 400
Palo Alto, CA 94306
Telephone: (650) 858-6000

JOSEPH R. WETZEL (SBN 238008)
joe.wetzel@lw.com
LATHAM & WATKINS LLP
505 Montgomery Street, Suite 2000
San Francisco, California 94111
Telephone: (415) 391-0600

Attorneys for Defendant
ANTHROPIC PBC
(Additional Counsel on Next Page)

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

CONCORD MUSIC GROUP, INC., ET AL.,

Plaintiffs,

v.

ANTHROPIC PBC,

Defendant.

Case No. 5:24-cv-03811-EKL-SVK

REQUEST FOR A DISCOVERY STATUS CONFERENCE

LOUIS W. TOMPROS (*Pro Hac Vice*)
louis.tompros@wilmerhale.com
STEPHANIE LIN (*Pro Hac Vice*)
stephanie.lin@wilmerhale.com
DISHA PATEL (*Pro Hac Vice*)
disha.patel@wilmerhale.com
WILMER CUTLER PICKERING HALE AND DORR LLP
60 State Street
Boston, MA 02109
Telephone: (617) 526-6000

ARI HOLTZBLATT (SBN 354361)
ari.holtzblatt@wilmerhale.com
ROBIN C. BURRELL (*Pro Hac Vice*)
robin.burrell@wilmerhale.com
WILMER CUTLER PICKERING HALE AND DORR LLP
2100 Pennsylvania Ave, NW
Washington, DC 20006
Telephone: (202) 663-6000

TAYLOR GOOCH (SBN 294282)
taylor.gooch@wilmerhale.com
KYLE EDWARDS HAUGH (SBN 323952)
kyle.haugh@wilmerhale.com
WILMER CUTLER PICKERING HALE AND DORR LLP
50 California St.
San Francisco, CA 94111
Telephone: (628) 235-1000

ANDREW M. GASS (SBN 259694)
andrew.gass@lw.com
BRITTANY N. LOVEJOY (SBN 286813)
brittany.lovejoy@lw.com
IVANA DUKANOVIC (SBN 312937)
ivana.dukanovic@lw.com
LATHAM & WATKINS LLP
505 Montgomery Street, Suite 2000
San Francisco, California 94111
Telephone: (415) 391-0600

SARANG V. DAMLE (*Pro Hac Vice*)
sy.damle@lw.com
LATHAM & WATKINS LLP
555 Eleventh Street NW, Suite 1000
Washington, DC 20004
Telephone: (202) 637-2200

ALLISON L. STILLMAN (*Pro Hac Vice*)
alli.stillman@lw.com
LATHAM & WATKINS LLP
1271 Avenue of the Americas
New York, New York 10020
Telephone: (212) 906-1747

Defendant Anthropic PBC ("Anthropic") respectfully requests that the Court schedule a status conference in this matter at the earliest convenient date for the Court. Anthropic is cognizant of the Court's heavy docket and that this case has already taken substantial attention from the Court. But Anthropic raises this request now in the hope that the Court can provide guidance to the parties that may help avoid or streamline future disputes.

Fact discovery in this matter is set to close in less than three weeks, on October 21, 2025. Over the past month, Publishers have raised nine late-breaking discovery disputes with Anthropic that have resulted or will result in Publishers filing joint discovery dispute statements seeking resolution by the Court. Five have already been filed on the docket, *see* Dkts. 420, 439, 447, 450, and 455. This began shortly after Anthropic opposed Plaintiffs' untimely motion to amend the scheduling order and complaint on August 25, 2025, Dkt. 419, and an indicative settlement was announced in the *Bartz v. Anthropic* litigation on September 5—and has ramped up since Publishers filed their second motion to extend the discovery schedule on September 19, Dkt. 435, which Anthropic has opposed, Dkt. 441. Publishers have simultaneously begun refusing substantively to confer or compromise regarding Publishers' deficient responses to Anthropic's discovery requests; as a result, although Anthropic worked hard to try to substantively confer and compromise, it may have no choice but to bring these disputes to the Court in the coming days.

As this pattern has emerged, Anthropic has grown concerned that discovery is proceeding in a manner that is inconsistent with the Court's admonishment that the parties should work together to resolve discovery disputes and reach reasonable resolutions or compromises. Anthropic therefore respectfully asks the Court to schedule a status conference at the earliest convenient date so that the parties can obtain the Court's guidance on how best to manage these discovery disputes and achieve Judge Lee's October 21, 2025, deadline for the close of fact discovery. To facilitate that discussion, Anthropic identifies the following filed or soon to be filed discovery letter briefs:

1. Anthropic's joint dispute statement seeking a protective order to preclude Publishers' deposition questioning regarding torrenting and pirate libraries not at issue in this case. This dispute will affect the scope of all depositions, including those scheduled for October 9, 10, and thereafter, Dkt. 457.

2. Publishers' joint dispute statement regarding Anthropic's custodial searches and productions, Dkt. 439.
3. Publishers' joint dispute statement regarding the deposition of Dario Amodei, Dkt. 447.
4. Publishers' joint dispute statement regarding Anthropic's confidentiality designations, Dkt. 450.
5. Publishers' joint dispute statement regarding Anthropic's responses to RFPs.
6. Publishers' joint dispute statement regarding the production of Bartz deposition transcripts, Dkt. 455.
7. Publishers' joint dispute statement regarding the scope of the Court's September 8, 2025 discovery order, which concerned the production of *Bartz* briefing to Publishers.
8. Publishers' joint dispute statement regarding the scope of the Court's August 8, 2025 discovery order. This dispute relates to inquiries made of several employees regarding their use of personal Claude accounts.
9. Publishers' joint dispute statement regarding Anthropic's responses to Publishers' 30(b)(6) topics.
10. Anthropic's joint dispute statement regarding Publishers' investigation and deficient responses to Interrogatory Nos. 3-7.
11. Anthropic's joint dispute statement regarding Publishers' refusal to provide deposit copies.
12. Anthropic's joint dispute statement regarding Publishers' refusal to provide documents and testimony regarding songwriter agreements, enforcement efforts, and enforcement costs.
13. Anthropic's joint dispute statement regarding Publishers' deficient responses to contention Interrogatory Nos. 14-19, 22-24.
14. Anthropic's joint dispute statement regarding Publishers' refusal to provide 30(b)(6) witness and deficient production of licensing agreements and communications.

/s/ *Sonal N. Mehta*

Date: October 3, 2025

JOSEPH R. WETZEL (SBN 238008) SONAL N. MEHTA (SBN 222086)

joe.wetzel@lw.com
ANDREW M. GASS (SBN 259694)
andrew.gass@lw.com
BRITTANY N. LOVEJOY (SBN 286813)
brittany.lovejoy@lw.com
IVANA DUKANOVIC (SBN 312937)
ivana.dukanovic@lw.com
LATHAM & WATKINS LLP
505 Montgomery Street, Suite 2000
San Francisco, California 94111
Telephone: (415) 391-0600

SARANG V. DAMLE (*Pro Hac Vice*)
sy.damle@lw.com
LATHAM & WATKINS LLP
555 Eleventh Street NW, Suite 1000
Washington, DC 20004
Telephone: (202) 637-2200

ALLISON L. STILLMAN (*Pro Hac Vice*)
alli.stillman@lw.com
LATHAM & WATKINS LLP
1271 Avenue of the Americas
New York, New York 10020
Telephone: (212) 906-1747

sonal.mehta@wilmerhale.com
WILMER CUTLER PICKERING HALE AND DORR LLP
2600 El Camino Real, Suite 400
Palo Alto, CA 94306
Telephone: (650) 858-6000

LOUIS W. TOMPROS (*Pro Hac Vice*)
louis.tompros@wilmerhale.com
STEPHANIE LIN (*Pro Hac Vice*)
stephanie.lin@wilmerhale.com
DISHA PATEL (*Pro Hac Vice*)
disha.patel@wilmerhale.com
WILMER CUTLER PICKERING HALE AND DORR LLP
60 State Street
Boston, MA 02109
Telephone: (617) 526-6220

ARI HOLTZBLATT (SBN 354361)
ari.holtzblatt@wilmerhale.com
ROBIN C. BURRELL (*Pro Hac Vice*)
robin.burrell@wilmerhale.com
WILMER CUTLER PICKERING HALE AND DORR LLP
2100 Pennsylvania Ave, NW
Washington, DC 20006
Telephone: (202) 663-6000

TAYLOR GOOCH (SBN 294282)
taylor.gooch@wilmerhale.com
KYLE EDWARDS HAUGH (SBN 323952)
kyle.haugh@wilmerhale.com
WILMER CUTLER PICKERING HALE AND DORR LLP
50 California St.
San Francisco, CA 94111
Telephone: (628) 235-1000

Attorneys for Defendant
ANTHROPIC PBC