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

JOINT STIPULATION AND [PROPOSED] ORDER TO EXTEND CASE DEADLINES AND TAKE DEPOSITIONS OUT OF TIME

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 interim case deadlines for both Parties and take the two depositions of Anthropic employees out of time, 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, which extended various deadlines for discovery, at the Parties' joint request;

WHEREAS, on August 19, 2025, the Court entered the Amended Case Management & Scheduling Order, ECF No. 416, which extended various discovery and case deadlines, at the Parties' joint request;

WHEREAS, on October 9, 2025, the Court granted Plaintiffs' Motion to Extend Case Deadlines in part, ECF No. 435, extending the close of fact discovery to November 12, 2025, with the current expert discovery, dispositive motions, *Daubert* Motions, and trial deadlines remaining the same;

WHEREAS, the Parties agree and stipulate that there is good cause to take the deposition of two of Anthropic's fact witnesses out of time due to the previously scheduled international travel of one witness (Mr. Mann) and the parental leave of another witness (Mr. Brown);

WHEREAS, the Parties agree and stipulate to complete the deposition of Anthropic employee Mr. Mann (whom Publishers notified Anthropic on August 29 that they intended to depose as a 30(b)(1) witness, whom Anthropic has designated to testify on twenty-nine 30(b)(6) topics in response to Publishers' 30(b)(6) deposition notice dated August 15, and whose deposition was initially scheduled for October 17, but which Publishers requested to reschedule on October 9 given the outstanding documents impacting the deposition that Magistrate Judge van Keulen

ordered Anthropic to produce by October 27, and Anthropic agreed to postpone) on or before November 21;

WHEREAS, the Parties agree and stipulate to schedule the deposition of Anthropic employee Mr. Brown (whose deposition was previously scheduled and noticed for September 29, but had to be postponed for Mr. Brown's parental leave) on a mutually agreeable date in January 2026 following his parental leave[1];

WHEREAS, the Parties agree and stipulate that there is good cause to extend the current expert report deadlines by approximately one month to allow the Parties time to complete outstanding fact discovery in advance of those reports, including in light of the fact that Mr. Mann's 30(b)(1) and 30(b)(6) deposition will be completed out of time;

WHEREAS, the Parties agree and stipulate that there is good cause to set briefing deadlines for Motions for Summary Judgment and *Daubert* Motions because it will provide certainty as to the briefing schedule and will not affect the deadline for the close of briefing or the hearing date;

WHEREAS, these proposed deadlines will not affect any court-facing deadline or the trial date;

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 Defendant 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 deposition of Ben Mann may be taken out of time on or before November 21, 2025 and that the deposition of Tom Brown may be taken on a mutually agreeable date following his parental leave in January 2026. The Parties further stipulate, subject to the Court's approval, that the case deadlines specified by the Order are extended as reflected in the following table:

[1] The Parties agree that this stipulation does not alter the default limitations on the number of depositions each party may take set forth in Federal Rule of Procedure 30(a)(2)(A)(i), which limitations the Parties have agreed apply in this case.

Event	Previous Deadline	Proposed Deadline
Close of Fact Discovery	November 12, 2025	November 12, 2025 (no change)
Identify and Disclose Expert Witnesses and Exchange Expert Reports	November 24, 2025	December 19, 2025
Opposition Expert Reports	December 16, 2025	January 23, 2026
Reply Expert Reports	January 14, 2026	February 13, 2026
Depose All Expert Witnesses	March 9, 2026	March 9, 2026 (no change)
Motions for Summary Judgment and *Daubert* Motions	N/A	March 23, 2026
Oppositions to Motions for Summary Judgment and *Daubert* Motions	N/A	April 20, 2026
Replies in Support of Motions for Summary Judgment and *Daubert* Motions	N/A	May 11, 2026
Close of Briefing on Dispositive and/or Daubert Motions	May 11, 2026	May 11, 2026 (no change)
Hearing on Dispositive and/or Daubert Motions	June 10, 2026	June 10, 2026 (no change)
Joint Pre-Trial Statement	August 11, 2026	August 11, 2026 (no change)
Pre-Trial Conference	August 24, 2026	August 24, 2026 (no change)
Trial Date	September 28, 2026	September 28, 2026 (no change)

Date: October 27, 2025

/s/ Nicholas C. Hailey

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Respectfully Submitted,

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Attorneys for Defendant

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.

Date: October 27, 2025

/s/ Taylor Gooch
Taylor Gooch

[PROPOSED] ORDER

Pursuant to the Parties' Stipulation and Proposed Order to Extend Case Deadlines and Take Depositions Out of Time, and for good cause, the Court hereby modifies the case schedule as follows.

Event	Previous Deadline	Proposed Deadline
Close of Fact Discovery	November 12, 2025	November 12, 2025 (no change)
Identify and Disclose Expert Witnesses and Exchange Expert Reports	November 24, 2025	December 19, 2025
Opposition Expert Reports	December 16, 2025	January 23, 2026
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Joint Pre-Trial Statement	August 11, 2026	August 11, 2026 (no change)

Event	Previous Deadline	Proposed Deadline
Pre-Trial Conference	August 24, 2026	August 24, 2026 (no change)
Trial Date	September 28, 2026	September 28, 2026 (no change)

Further, pursuant to the Parties' stipulation, the depositions of Anthropic employees Mr. Mann and Mr. Brown may be taken out of time.

1. The deposition of Ben Mann will be completed on or before November 21, 2025.
2. The Parties will schedule the deposition of Tom Brown on a mutually agreeable date following his parental leave in January 2026 consistent with Federal Rule of Procedure 30(a)(2)(A)(i).

IT IS SO ORDERED.

Dated: _____, 2025

_____

THE HONORABLE EUMI K. LEE

United States District Judge