[Counsel on signature page]

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

CONCORD MUSIC GROUP, INC., ET AL.,

Plaintiffs,

vs.

ANTHROPIC PBC,

Defendant.

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

JOINT DISCOVERY DISPUTE STATEMENT REGARDING THE COURT'S OCTOBER 12, 2025 ORDER

Judge Eumi K. Lee
Magistrate Judge Susan van Keulen

Pursuant to Section 8 of the Court's Civil Standing Order, and L.R. 37-1 and 37-2, the Parties respectfully submit this Joint Discovery Dispute Statement regarding the Court's October 12, 2025 order. The Parties' lead counsel met and conferred to try to resolve their disagreement regarding the scope of the order via videoconference on October 17, 2025, and by email. However, the Parties are at impasse. The current fact discovery deadline is 12 days away. ECF 467. Given the nature of the dispute, Anthropic does not believe there is a viable compromise available: Anthropic seeks information that is necessarily within the scope of the Court's October 12, 2025 order. Publishers cannot offer a compromise given the clear scope of the Court's October 12 Order, and because Anthropic now seeks information beyond what its interrogatory requested and what the Court ordered. Anthropic respectfully requests a ruling in time to permit Publishers to produce the required information in advance of the deposition of Publishers' investigator, which is scheduled for November 3, 2025.

I. Anthropic's Position: The Court Should Confirm That Its October 12, 2025 Order Requires Publishers To Produce The Same Information For The 15,000 Prompt-Output Production As For The 5 Million Prompt-Output Sample.

As the Court acknowledged in its October 12, 2025 order, Publishers intend to "rely on two types of evidence in support of their allegations as to the ineffectiveness of Claude's guardrails: (1) evidence provided by Anthropic, *e.g.* documents or statistics derived from the sample, as to the effectiveness of guardrails; and (2) the fact that on certain dates, presumably after guardrails were assertedly implemented, Publishers' investigators were able to submit prompts that nonetheless resulted in allegedly infringing outputs." ECF 478 at 5 (footnote omitted). Accordingly, the Court held that a "limited and narrow waiver" of Publishers' work-product privilege has occurred: "because Publishers intend to present evidence that in their own (or their agents') experience Anthropic's guardrails failed at least some number of times, Anthropic must in fairness be permitted to discover and present evidence as to the number of times its guardrails did not fail." *Id.*

There are two sets of prompt-output pairs produced by Anthropic in this case. *First*, there is the random sample of 5 million prompts and outputs that the Court referred to in its order as an "example": Publishers intend to rely on "evidence provided by Anthropic, ***e.g.*** documents or

statistics derived from the sample." ECF 478 at 5 (emphasis added). *Second*, there is a second set of approximately 15,000 prompt-output pairs that Anthropic produced in response to Publishers' Requests for Production Nos. 50 and 51. Those prompts and outputs were identified by searching certain keywords in proximity to the titles or lyrics from the Works-in-Suit across the same six-month period of prompts and outputs from which the 5 million random sample is drawn. Critically, not all of the prompts and outputs in the 15,000 set are contained within the 5 million sample.

Publishers claim that Anthropic "explicitly disclaimed" this 15,000 set, but that is simply not true. In fact, that set of 15,000 was referred to explicitly by Anthropic's counsel several times at the October 10 hearing, alongside the 5 million sample, as similar evidence produced "independent of the sample" by Anthropic. 10/10/25 Hr'g Tr. at 85:24-86:3 (The Court: "[w]hen you say what Anthropic has produced … you're talking about using the sample?" Counsel for Anthropic: "The sample. We also have run through the six month period, the word "song," "lyrics" … that's actually even been produced independent of the sample."); *id.* at 114:13-20 (counsel for Anthropic discussing both the "5 million sample" and the set of "every prompted output during that period where [Anthropic] ran the word song, songs, lyrics, lyric"); *id.* at 102:12-20 (counsel for Anthropic discussing "this sample of 5 million" and "this sample of whatever resulted from the keyword searches"). Publishers themselves quote below from a portion of the transcript in which Anthropic's counsel discusses "the ***samples*** that we have produced"—"samples," plural, indicating that the discussion extended beyond just the 5 million sample. Anthropic's use of short-hand during the hearing to refer to the various sets of prompts and outputs that have been produced in this case does not change the analysis, and Publishers never suggested at the hearing that the 15,000 set should be treated differently from the 5 million sample.

Because the Court's October 12 order explicitly refers to the 5 million sample as just one ***example*** of "evidence provided by Anthropic," the Court's fairness analysis—and the information it ordered Publishers to produce—extends to other similar evidence produced by Anthropic—namely, the 15,000 set. ECF 478 at 5. Based on the Court's conclusion that a limited waiver of work product has occurred and that Anthropic is entitled to challenge the evidence plaintiffs intend to rely on to attack the effectiveness of the guardrails, the Court ordered: "Publishers, via their

own access to the 5-million record sample, will disclose to Anthropic: (a) the total number of the Publishers' (or their agents') prompts-output pairs that are encompassed in the sample; (b) the number of such prompts in the sample that resulted in the output of song lyrics; and (c) the number of such prompts in the sample that resulted in the invocation of Claude's guardrails or otherwise failed to elicit song lyrics." *Id.* at 6. The set of 15,000 prompt-output pairs falls into the exact same category: it is "evidence provided by Anthropic" that Publishers intend to "rely on … in support of their allegations as to the ineffectiveness of Claude's guardrails." *Id.* at 5. And the Court's reasoning applies equally to the set of 15,000 prompt-output pairs: to the extent that Publishers intend to rely on the 15,000 set to argue that the guardrails are ineffective, a limited waiver has occurred and Anthropic is entitled at a minimum to this same limited information—i.e., the corresponding three figures above—to enable it to rebut that specific evidence.[1]

Accordingly, by email on October 15, 2025, and on the parties' October 17, 2025 meet and confer between counsel, Anthropic asked Publishers to confirm that they would provide the same information for the set of 15,000 prompt-output pairs as for the 5 million sample. Publishers refused. Anthropic then asked Publishers to stipulate that they would not rely on the prompts-outputs in the set of 15,000 prompt-output pairs to argue that the guardrails are ineffective. Publishers not only refused this stipulation, they affirmatively confirmed that they intend to rely on this evidence for that purpose. And their arguments here confirm that they intend to rely on outputs in the 15,000 set. Anthropic is therefore entitled in fairness to basic information about

[1] As Anthropic has previously explained, this request does not seek protected work product but rather only basic, nonsubstantive descriptive information commonly disclosed in privilege logs. *See In re Methyl Tertiary Butyl Ether (MTBE) Prods. Liability Litig.*, 293 F.R.D. 568, 573 (S.D.N.Y. 2013) (party invoking work product must "describe the nature of the … things not produced … in a manner that … will enable other parties to assess the claim" (quoting Fed. R. Civ. P. 26(b)(5)(A)(ii))). Disclosing such purely descriptive information does not reveal any mental impressions of counsel. Even if the work product privilege did apply, Publishers cannot simultaneously use aggregate data about their own testing as a sword to establish liability but invoke the work product doctrine to shield the basic contours of its testing from Anthropic's view. When a party's claim turns on "the adequacy of its pre-litigation investigation," as Publishers' guardrails-effectiveness arguments do, it "must turn over documents related to [its] investigation" that are "important in proving or disproving" its alleged findings. *Walker v. Cnty. of Contra Costa*, 227 F.R.D. 529, 535 (N.D. Cal. 2005). And in all events, Anthropic has a "substantial need" for this information to "impeach[] or corroborat[e]" central issues in this case. *Hickman v. Taylor*, 329 U.S. 495, 511 (1947).

these prompts and outputs that will enable Anthropic to respond.

Publishers' attempts below to distinguish the applicability of the Court's order to the 15,000 set, on the one hand, and the 5 million sample, on the other, are meritless. *First*, Publishers inexplicably highlight the lyrics-specific nature of the 15,000 set relative to the 5 million sample. But because the 15,000 set was derived from case-relevant keyword searches, the 15,000 set is in fact ***more*** likely to be a source of Publishers' guardrails-related evidence. That makes it even more important for Publishers to provide the required information for this 15,000 set. Otherwise, Publishers would be permitted to use this set as a sword to establish liability but shield from discovery (and challenge by Anthropic) the very information the Court has ordered produced for other samples. *Second*, Publishers argue that Anthropic should be able to compare the approximately 5,000 prompts and outputs that Publishers produced to the 15,000 set to determine which of Publishers' produced prompts and outputs are in the set. But that comparison would not provide Anthropic all of the relevant information the Court has determined it is entitled to—specifically the "denominator" associated with any "positive" results on which Publishers intend to rely. Anthropic cannot determine that for the 15,000 set without the three figures ordered by the Court. *Third*, Publishers incorrectly suggest that the three figures would permit Anthropic to "reverse engineer" Publishers' undisclosed prompts and outputs. Again, that is simply untrue. Those figures do not permit reverse engineering for the 15,000 set anymore than they do for the 5 million sample. *Finally*, Publishers assert without explanation that the figures for the 15,000 set could be "misleading." This of course reveals the true concern behind Publishers' continued objections to producing this highly relevant evidence: it doesn't clearly support their intended narrative. That might be true, but it does not justify refusing production. Publishers will be entitled to present to the fact-finder any context about the 15,000 set that they would like, including that it does not reflect a random sample. That is no reason to deny Anthropic relevant and proportional discovery necessary to defend against prompt-output pairs that Publishers have put at issue.

Accordingly, Anthropic respectfully requests that the Court confirm that its October 12, 2025 order applies to all "evidence provided by Anthropic" and therefore requires Publishers to disclose to Anthropic (a) the total number of the Publishers' (or their agents') prompt-output pairs

that are encompassed in the set of 15,000 prompt-output pairs; (b) the number of such prompts in the sample that resulted in the output of song lyrics; and (c) the number of such prompts in that set of prompt-output pairs that resulted in the invocation of Claude's guardrails or otherwise failed to elicit song lyrics. Anthropic reserves the right to move to preclude Publishers from making arguments based on the set of 15,000 prompt-output pairs if they do not disclose this relevant information.

Anthropic also respectfully requests a ruling in advance of the 30(b)(1) deposition of Publishers' investigator, which is scheduled for November 3. Anthropic's original version of this dispute statement asked for a ruling in advance the October 29 deposition of Alisa Coleman, who is both a 30(b)(1) witness and ABKCO's 30(b)(6) witness, as well. Publishers nevertheless took nearly a week to return their insert, delivering it on October 27, making it virtually impossible to obtain a ruling from the Court before the October 29 deposition. Anthropic accordingly held the October 29 deposition open and now seeks a ruling by the November 3 deposition. Publishers' reliance on the Court's decision to deny a 30(b)(6) deposition on these issues is a non-sequitur. Anthropic is not asking Publishers to prepare a 30(b)(6) witness on these issues. Rather, it intends to and is entitled to ask Publishers' 30(b)(1) witnesses about the three figures ordered by the Court over which the Court has determined that any work product privilege has been waived.

II. Publishers' Position: Anthropic improperly seeks to make an end-run around the Court's discovery ruling and to drastically expand the scope of ordered discovery.

The Court has already considered and denied Anthropic's request for the additional, invasive discovery into the details of Publishers' legal investigation it pursues again here. The Court made clear in its October 12 Order precisely what information Publishers must provide to Anthropic on this topic and why. ECF No. 478. Now, under the guise of a request to "confirm" the Order, Anthropic attempts to drastically ***expand*** that Order by demanding—for the third time—to invade Publishers' work product protection over additional details of their legal investigation. Anthropic cannot be permitted to make an end-run around this Court's rulings on this critical issue.

In its October 12 Order, the Court emphasized that "the prompts and related settings used by Publishers in their pre-suit investigation are attorney work-product," and recognized "the danger of crossing the line into discovery of opinion work product" by disclosing too much

information about Publishers' legal investigation. ECF No. 478 at 4, 6. Ultimately, the Court ordered that Publishers were required to respond to Anthropic's Interrogatories 3 and 4 by disclosing certain high-level figures regarding their Claude prompts and output from their legal investigation, and to respond to Anthropic's Interrogatory 6 by disclosing similar high-level figures regarding Publishers' prompts and output included in the random 5-million-record Claude sample produced by Anthropic. *Id.* at 5–6. ***Nowhere*** did the Court order Publishers to further respond to Interrogatory 6 by disclosing information about their prompts and output included in Anthropic's separate and distinct production of approximately 15,000 Claude records hitting on specific search terms relating to Publishers' Works in Suit—and for good reason.

Unwilling to take "no" for an answer, Anthropic now brings what it styles as a motion to "confirm" that the Court's Order says something it does not. Anthropic's submission is really a motion for reconsideration of a request the Court already denied, and that motion must fail: Anthropic has not sought leave to file such a motion as the Court's rules require, Civ. L.R. 7-9(a), and has not even tried to argue, as the Court's rules also require, either that "a material difference in fact or law exists from that which was presented to the Court," or "[t]he emergence of new material facts or a change of law," or a "manifest failure by the Court to consider material facts or dispositive legal arguments which were presented to the Court . . . ." Civ. L.R. 7-9(b)(1)–(3).

In any event, Anthropic neither needs nor is entitled to any specific figures relating to Publishers' prompts and outputs in the 15,000 records it produced. Publishers have already made clear they ***do not intend to rely*****,** to prove the inefficacy of guardrails or otherwise, on any copies in Anthropic's 15,000-record production of their own prompts and output records. Publishers have already produced their ***own*** copies of those Claude prompt and output records from Publishers' own investigation on which Publishers intend to rely in this case. ECF No. 369 at 1.

More broadly, because the 15,000-record production is ***not*** a statistically significant sample like the 5-million-record sample, the figures Anthropic seeks do not bear on its argument as to the effectiveness of its guardrails. Anthropic likewise does not need this information to differentiate Publishers' prompts and output in this set. Indeed, Anthropic's counsel made clear at the October 10 hearing that Interrogatory 6 was relevant to the Claude sample specifically, not the separate

non-sample production. Further, the figures Anthropic demands could be highly misleading, as it apparently intends to exploit such numbers to extrapolate from a non-representative production.

A. Anthropic mischaracterizes the discovery at issue in an improper attempt to expand the Court's Order after the fact.

As an initial matter, Anthropic misstates the nature of the production of 15,000 Claude records at issue. First, these records are ***not*** a "sample" in any sense. They were not identified by any statistical sampling procedure, but instead by targeted searches. Second, these 15,000 Claude records were ***not*** the result of general searches for the terms "song," "songs," "lyric," and "lyrics" as Anthropic claims; instead, Anthropic ran targeted searches relating to specific song titles and lyric strings for the 499 Works in Suit specifically. The Parties and the Court have discussed these searches at length.[2] Nevertheless, Anthropic's counsel misrepresented at the October 10 hearing that this 15,000-record production consisted of broader searches for the terms "song," "songs," "lyric," and "lyrics." *See, e.g.*, Hr'g Tr. 85:24–86:3 (Oct. 10, 2025) (Ms. Mehta: "We also have run through the six month period, the word "song," "lyrics" . . . that's actually even been produced ***independent of the sample***.") (emphasis added); *id.* at 114:13–20 (Anthropic's counsel discussing both the "5 million sample" and the set of "every prompted output during that period where [Anthropic] ran the word song, songs, lyrics, lyric"). That Anthropic's counsel demanded this protected information regarding Publishers' legal investigation—apparently without understanding what the production at issue actually contains—makes clear that Anthropic's purpose here is to fish for further details of Publishers' legal investigation without care for whether that information is relevant for the reasons it claims.

B. Interrogatory 6 does not cover the information Anthropic now seeks.

Anthropic previously made clear that its Interrogatory 6 sought only information regarding the random 5-million-record Claude sample—***not*** the non-sample production of 15,000 documents hitting on specific song title and lyric search terms. Anthropic cannot flip its position after the fact and now seek to stretch the Court's order to encompass discovery it did not request previously.

[2] *See, e.g.*, Hr'g Tr. at 24:9–15 (Mar. 18, 2025) (Mr. Damle: "[W]e've started reviewing and producing conversations with—Claude conversations that match on those lyric string . . . also on the title, the title searches, as well. So, to the extent that . . .it matches title within five of 'lyric' or 'words to,' we've started producing that data").

Anthropic's counsel made clear at the October 10 hearing that it intended Interrogatory 6 to identify information regarding the 5-million Claude sample only: "[W]e are asking [in Interrogatory 6] for the usernames of the publishers and their agents ***so that we can figure out of the samples that we have produced*** which ones came from them, which ones came from true third parties." Hr'g Tr. 81:6–9 (Oct. 10, 2025) (emphasis added); *see also id.* 82:12-21 (Ms. Mehta: "[W]e produced ***a sample*** to [Publishers] and . . . we need a way to disentangle which ones came from their agents and from them and which ones came from true third parties."); *id*. at 85:24–86:3 (Ms. Mehta describing the 15,000 records as "produced independent of the sample"). Moreover, the Court's order recognized Anthropic's stated rationale for Interrogatory 6 limited Interrogatory 6's scope to the "emails and usernames associated with Publishers' investigators, which Anthropic asserts it needs to ***disentangle Publishers' prompts and outputs from the larger 5-million record sample***." ECF No. 478 at 6 (emphasis added). That is why the Court ordered Publishers to produce certain numbers regarding their prompts and output included in the Claude sample—but not with respect to the separate non-sample production of 15,000 records.

C. There is no basis to compel Publishers to disclose figures regarding their legal investigation in connection with the 15,000-record production.

The distinctions between the 5-million-record sample and the more targeted 15,000-document production make clear why there is no basis for Anthropic's attempt to stretch the Court's ruling. The 5-million-record sample reflects a statistically significant sample of all Claude prompt-output pairs for the given 6-month period. As the Court knows, this sample was conceived as a statistically significant sample of Claude prompt-output pairs to test "whether prompts and outputs for song lyrics are 'typical' for Claude products," including the effectiveness of Claude's guardrails in preventing copyrighted output. ECF No. 306 at 1 n.1, 2. By contrast, the separate production of 15,000 documents is ***not*** a statistically significant sample—it reflects focused searches targeted at Works in Suit and reflecting specific infringements of those Works in Suit.[3]

[3] Indeed, Anthropic's counsel has specifically distinguished the nature and purpose of the broader Claude sample from these more targeted productions. *See, e.g.*, Hr'g Tr. at 33:23–34:22 (March 18, 2025) (Anthropic's counsel: "The whole sampling approach, the only thing I would emphasize is, it is really aimed at not the Works in Suit, but works that are not in suit").

Accordingly, Anthropic has no basis whatsoever for demanding the specific figures with respect to this narrower set of 15,000 Claude records. Contrary to Anthropic's contention, those figures will not enable Anthropic to extrapolate anything about the broader population of Claude prompts and outputs, Anthropic's claimed purpose for this discovery. Ordering Publishers to provide this information would serve no practical purpose for Anthropic's analysis.

Moreover, to the extent Anthropic's 15,000-record production happens to include copies of Publishers' prompt and output records from their legal investigation, Publishers do not intend to rely on those copies of the records specifically. As the Court is aware, Publishers have already produced their own copies of nearly 5,000 Claude prompt and output records from Publishers' own investigation on which Publishers intend to rely in this case. *See, e.g.*, ECF No. 369 at 1 (detailing production). To the extent the 15,000 records that Anthropic produced back to Publishers include copies of those same records, Publishers need not rely on the copies of those same records that Anthropic produced back to them. Rather, Publishers intend to rely on records of ***third-party user infringement*** from Anthropic's 15,000 record production. As a result, Anthropic has no need whatsoever for any specific metrics regarding ***Publishers'*** prompts and output included in the 15,000 record production, and these numbers in a vacuum will be misleading given the non-sample nature of the production. As such, Publishers obviously could not agree to Anthropic's demanded stipulation, which would improperly preclude Publishers from relying on (1) prompt-output pairs they have already disclosed to Anthropic as attributable to their investigation, and (2) third-party prompt-output pairs that are critical evidence of Anthropic's infringement.

Requiring Publishers to disclose the requested figures for the 15,000-record production would seriously risk disclosing information regarding Publishers' legal investigation that the Court has repeatedly held is protected work product. Specifically, the figures Anthropic seeks would empower Anthropic to improperly invade Publishers' work product protection over their legal investigation by enabling Anthropic to attempt to reverse-engineer the numbers from a much smaller production to identify which specific prompts and output are attributable to Publishers (including undisclosed prompts and outputs). The Court has already determined that information to be unequivocally off-limits, ECF No. 478 at 6; *see also* ECF No. 377 at 3–4, and carefully

crafted its order here specifically to avoid the risk that Anthropic could reverse-engineer Publishers' investigation. ECF No. 478 at 6 ("[T]he Court is concerned that revealing Publishers' usernames and emails would give Anthropic the key it needs to unlock the door to the prompts and outputs themselves—which this Court denied in its Prior Order.").

Anthropic's request that this Court rule on its expanded discovery demands immediately—prior to scheduled depositions of Publishers' witnesses, and at the same time it seeks Judge Lee's review of this Court's broader October 12 Order—further underscores the impropriety of Anthropic's motion.[4] This Court explicitly denied Anthropic's request to take a Rule 30(b)(6) deposition on these same topics (*i.e.,* Publishers' investigations of Claude), stating that such depositions would "invite an inviolate crossing of that [work-product] border." ECF No. 478 at 6. Obviously, asking a 30(b)(1) witness the same questions the Court already ruled out-of-bounds for a 30(b)(6) deposition invites the same inviolate border crossing. Anthropic's tying the instant request to upcoming depositions is its latest attempt to cross that work-product border despite the Court's careful line-drawing, and Anthropic cannot clear the extremely high bar required for the Court to reconsider its earlier ruling. Moreover, despite Anthropic's multiple prior requests and this Court's consequent orders regarding Publishers' investigative work product, Anthropic has now asked Judge Lee to reverse the portions of the October 12 Order that denied it discovery, once again attempting to access all information from Publishers' investigation. Anthropic's continued pursuit of this discovery on multiple fronts, in spite of this Court's clear ruling, underscores that Anthropic will be satisfied with nothing short of complete exposure of the protected details of Publishers' legal investigation. That cannot be permitted. Anthropic's motion should be denied.

[4] Anthropic complains that Publishers took "nearly a week" to return their portion of this dispute statement. The typical practice of the parties, for the past two years, has provided each side approximately a week to respond to a proffered dispute statement. Anthropic sent the dispute statement to Publishers on October 21 at 7:39 pm; Publishers returned the draft on October 27 at 4:03 pm. Given the highly sensitive nature of this dispute, Publishers took care in drafting their response while explaining to Anthropic that they would return their portion as soon as practicable. Belying Anthropic's claim to urgency, rather than file the statement immediately after Publishers returned it, Anthropic chose to substantially rewrite its section, further delaying filing by several days.

Date: October 31, 2025

By: /s/ Nicholas C. Hailey

OPPENHEIM + ZEBRAK, LLP

Matthew J. Oppenheim
Nicholas C. Hailey
Jeffrey M. Gould
Corey Miller
Audrey L. Adu-Appiah
(admitted pro hac vice)
4530 Wisconsin Ave., NW, 5th Floor
Washington, DC 20016
Telephone: (202) 480-2999
matt@oandzlaw.com
nick@oandzlaw.com
jeff@oandzlaw.com
corey@oandzlaw.com
aadu-appiah@oandzlaw.com

Alexander Kaplan
Jennifer Pariser
Andrew Guerra
Bret Matera
Timothy Chung
Michelle Gomez-Reichman
(admitted pro hac vice)
461 5th Avenue, 19th Floor
New York, NY 10017
Telephone: (212) 951-1156
alex@oandzlaw.com
jpariser@oandzlaw.com
andrew@oandzlaw.com
bmatera@oandzlaw.com
tchung@oandzlaw.com
mgomez-reichman@oandzlaw.com

COBLENTZ PATCH DUFFY & BASS LLP
Jeffrey G. Knowles (SBN 129754)
One Montgomery Street, Suite 3000
San Francisco, CA 94104
Telephone: (415) 391-4800
ef-jgk@cpdb.com

COWAN, LIEBOWITZ & LATMAN, P.C.
Richard S. Mandel
Jonathan Z. King
Richard Dannay
(admitted pro hac vice)

Respectfully submitted,

By: /s/ Ari Holtzblatt

WILMER CUTLER PICKERING HALE AND DORR LLP

SONAL N. MEHTA (SBN 222086)
sonal.mehta@wilmerhale.com
ALLISON BINGXUE QUE (SBN 324044)
allison.que@wilmerhale.com
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
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
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
50 California St.
San Francisco, CA 94111
Telephone: (628) 235-1000

Attorneys for Defendant
ANTHROPIC PBC

114 West 47th Street
New York, NY 10036-1525
Telephone: (212) 790-9200
rsm@cll.com
jzk@cll.com
rxd@cll.com

Attorneys for Plaintiffs

SIGNATURE ATTESTATION PURSUANT TO CIVIL L.R. 5-1(h)

Pursuant to Civil L.R. 5-1(h), I hereby attest that concurrence in the filing of the document was obtained from the document's signatories. I declare under penalty of perjury that the foregoing is true and correct.

Dated: October 31, 2025

/s/ Ari Holtzblatt
Ari Holtzblatt