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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 Dispute Statement Regarding Anthropic's Production of Guardrail Information (the "Joint Discovery Dispute Statement").

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. 498-1	Joint Discovery Dispute Statement	Highlighted portions at pp. 1–10.
ECF No. 498-2	Exhibit 1 – Plaintiffs' Third Set of RFPs to Defendant	Highlighted portions at p. 10
ECF No. 498-3	Exhibit 2 – Defendant Anthropic's Amended Responses and Objections to Plaintiffs' Third Set of RFPs	Highlighted portions at pp. 26-27.
ECF No. 498-4	Exhibit 3 – Excerpt from Vinay Rao Deposition Transcript	Entire document.
ECF No. 498-5	Exhibit 4 – Parties' Joint Chart	Highlighted portions at pp. 1–2.
ECF No. 498-6	Publishers' Proposed Order	Highlighted portions at p. 1.
ECF No. 498-7	Anthropic's Proposed Order	Highlighted portions at p. 1.

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: November 19, 2025

Respectfully submitted,

/s/ Timothy Chung

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