EXHIBIT F – PARTIES' JOINT CHART

Anthropic's Requests	Publishers' Responses	Anthropic's Proposed Compromise	Publishers' Proposed Compromise	For the Court's Use
RFP No. 37: Documents sufficient to show each of the Claude accounts created or used by any Person who participated in or was aware of use of Claude-Based Services to derive any of the outputs cited or referred to in the Complaint.	**RFP No. 37** Publishers object to this Request on the basis that it purports to require Publishers to produce Documents that are protected by the attorney-client privilege, work product doctrine, or any other applicable privilege or immunity. Anthropic seeks this information in order to reconstruct the evidentiary searches conducted by Publishers' counsel. Those searches are protected by the attorney-client privilege and work product doctrines and therefore the information called for in this Request is similarly protected from disclosure. Accordingly, Publishers will not produce Documents in response to this Request beyond any Documents already produced in this Litigation or any Documents Publishers have otherwise agreed to produce that are responsive to other Requests.	Anthropic does not believe there is a viable compromise available because it has already exhausted more targeted attempts to obtain the information necessary to mount a proper defense.	Publishers disagree that any more discovery into their investigative prompts and outputs is warranted or necessary for Anthropic to mount its defense, and Publishers cannot offer any further compromise given that the Court has already rejected this discovery in two previous orders, *see* ECF No. 377 at 2-4; ECF No. 478 at 4-6.	

RFP No. 38: Documents sufficient to show each of the prompts You entered into Claude or Claude-Based Services and the resulting output, regardless of whether the intent was to generate allegedly infringing outputs, including without limitation Documents sufficient to show the user or organization account used, any system prompts and/or temperature setting used, and the date and time on which that prompt was entered.	**RFP No. 38** Publishers object to this Request on the basis that it purports to require Publishers to produce Documents that are protected by the attorney-client privilege, work product doctrine, or any other applicable privilege or immunity. Anthropic seeks this information in order to reconstruct the evidentiary searches conducted by Publishers' counsel. Those searches are protected by the attorney-client privilege and work product doctrines and therefore the information called for in this Request is similarly protected from disclosure. Accordingly, Publishers will not produce Documents in response to this Request beyond any Documents already produced in this Litigation or any Documents Publishers have otherwise agreed to produce that are responsive to other Requests.	See above.	See above.	
RFP No. 39: For each Claude output cited or referred to in the Complaint, Documents	**RFP No. 39:** Publishers object to this Request on the basis that it purports to require Publishers to produce Documents	See above.	See above.	

sufficient to show the process for obtaining that output, including without limitation the full chat log, the prompts used, any system prompts used, each and every output generated by Claude or a Claude-Based Service as a result of each prompt, the time and date of those queries, and the user or organization account.	that are protected by the attorney-client privilege, work product doctrine, or any other applicable privilege or immunity. Anthropic seeks this information in order to reconstruct the evidentiary searches conducted by Publishers' counsel. Those searches are protected by the attorney-client privilege and work product doctrines and therefore the information called for in this Request is similarly protected from disclosure. Accordingly, Publishers will not produce Documents in response to this Request beyond any Documents already produced in this Litigation or any Documents Publishers have otherwise agreed to produce that are responsive to other Requests.			
RFP No. 40: All Documents and Communications relating to the alleged reproduction, public display, distribution, or preparation of derivative works in connection with Your Asserted	**RFP No. 40:** Publishers object to this Request on the basis that it purports to require Publishers to produce Documents that Publishers object to this Request on the basis that it purports to require Publishers to produce Documents that evidence of	See above.	See above.	

Works via Claude or Claude-based Services.	Anthropic's infringement of Publishers' Asserted Works. Accordingly, Publishers will not produce Documents in response to this Request beyond any Documents already produced in this Litigation or any Documents Publishers have otherwise agreed to produce that are responsive to other Requests.			
RFP No. 41: Documents sufficient to show any attempt by You, including all failed attempts, to reproduce any of Your Asserted Works via Claude or Claude-Based Services.	**RFP No. 41:** Publishers object to this Request on the basis that it purports to require Publishers to produce Documents that are protected by the attorney-client privilege, work product doctrine, or any other applicable privilege or immunity. Anthropic seeks this information in order to reconstruct the evidentiary searches conducted by Publishers' counsel. Those searches are protected by the attorney-client privilege and work product doctrines and therefore the information called for in this Request is similarly protected from disclosure. Accordingly, Publishers will not produce Documents in	See above.	See above.	

	response to this Request beyond any Documents already produced in this Litigation or any Documents Publishers have otherwise agreed to produce that are responsive to other Requests.			
RFP No. 42: Documents sufficient to show each of the Claude accounts You or Your Agents have created or used, including without limitation Documents sufficient to show the email addresses and IP addresses associated with each such account(s), the username(s) for the account(s), the organization ID and name associated with the account(s), and date of registration or activation for the account(s).	**RFP No. 42:** Publishers object to this Request on the basis that it purports to require Publishers to Produce Documents that are protected by the attorney-client privilege, work product doctrine, or any other applicable privilege or immunity. Anthropic seeks this information in order to reconstruct the evidentiary searches conducted by Publishers' counsel. Those searches are protected by the attorney-client privilege and work product doctrines and therefore the information called for in this Request is similarly protected from disclosure. Accordingly, Publishers will not produce Documents in response to this Request beyond any Documents already produced in this Litigation or any Documents Publishers	See above.	See above.	

	have otherwise agreed to produce that are responsive to other Requests.			
RFP No. 43: All Documents and Communications relating to each and every prompt and alleged output via Claude or Claude-Based Services in the Complaint, including but not limited to the prompts used to derive the outputs quoted therein, along with any system prompts used, the date and time on which that prompt was entered, the user or organization account used, and each resulting output.	**RFP No. 43:** Publishers object to this Request on the basis that it purports to require Publishers to produce Documents that are protected by the attorney-client privilege, work product doctrine, or any other applicable privilege or immunity. Anthropic seeks this information in order to reconstruct the evidentiary searches conducted by Publishers' counsel. Those searches are protected by the attorney-client privilege and work product doctrines and therefore the information called for in this Request is similarly protected from disclosure. Publishers have already produced evidence of Anthropic's infringement of Publishers' Asserted Works. Accordingly, Publishers will not produce Documents in response to this Request beyond any Documents already produced in this Litigation or any Documents Publishers	See above.	See above.	

	have otherwise agreed to produce that are responsive to other Requests.			
ROG 1: Identify the Persons, Agents, Employees, or Third Parties who directly participated in or were aware of use of Claude and Claude-Based Services to derive any of the outputs cited or referred to in the Complaint and any other outputs on which You plan to rely upon in support of Your claims in this Action, including the name, title, employer, Claude account username(s), email address(es) associated with Claude account(s), and IP address(es) of each such Person.	**ROG 1:** Publishers object to this Interrogatory on the basis that it purports to require Publishers to furnish information that is protected by the attorney-client privilege, work product privilege, or any other applicable privilege or immunity. Anthropic seeks this information in order to reconstruct the evidentiary searches conducted by Publishers' counsel. Those searches are protected by the attorney-client privilege and work product doctrines and therefore the information called for in this Interrogatory is similarly protected from disclosure.	See above.	See above.	