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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 MODIFYING SEALING PROCEDURES RELATING TO DISPOSITIVE MOTIONS AND *DAUBERT* BRIEFING

CIV. L. R. 7-12

Judge Eumi K. Lee
Magistrate Judge Susan van Keulen

Pursuant to Civil Local Rule 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 conferred, hereby respectfully submit this joint stipulation and proposed order regarding anticipated sealed filings related to the Parties' motions for summary judgment and *Daubert* motions.

On February 26, 2026, the Court granted the Parties' stipulation to extend case deadlines. Plaintiffs' opening summary judgment brief is due March 23, 2026, Anthropic's opposition and opening summary judgment brief is due April 20, 2026, and the Parties' *Daubert* motions are due March 31, 2026. The Parties are cognizant of the Court's guidance regarding public access to court records and admonition against overbroad or non-specific requests to seal. Given the nature of the claims and defenses in this case, the Parties anticipate that the forthcoming dispositive and *Daubert* motions will include certain highly-confidential financial and technical information that is competitively sensitive and subject to sealing requests. Given the number of briefs and corresponding anticipated number of administrative motions to seal, the parties propose to streamline the process by filing a combined administrative motion to seal for all requests where sealing is unopposed and a single combined administrative motion to seal covering all opposed requests, following the completion of briefing ("Omnibus Sealing Motions"). This proposal is modeled on other Standing Orders in the District contemplating a modified procedure for briefing with multiple sealing motions, *see e.g.*, Standing Order for Civil Cases before Judge Donato at ¶ 31, and is intended to streamline the number of motions for the Court's consideration.

In support of this joint stipulation and proposed order, the Parties state as follows:

WHEREAS, this Court's February 26, 2026 Scheduling Order set a schedule for briefing associated with dispositive motions and *Daubert* motions. As set forth in that Order, Plaintiffs opening summary judgment brief is due March 23, 2026, Anthropic's opposition and opening summary judgment brief is due April 20, 2026, and briefing is scheduled to be complete on Parties' dispositive motions on June 8, 2026. Parties' *Daubert* motions are due March 31, 2026 and briefing is scheduled to be complete on Parties' *Daubert* motions on May 19, 2026.

WHEREAS, the Parties anticipate that briefing on the dispositive motions and *Daubert* motions will involve multiple administrative motions to seal. The Parties have conferred and jointly propose, subject to the Court's approval, certain modifications to this Court's procedures for sealing of filings associated with the dispositive motion briefing and *Daubert* briefing for efficiency and to reduce the burden on the Court and the parties. The Parties are mindful of the Court's caution that sealing requests should be narrowly tailored and well-supported.

WHEREAS, the Parties propose filing a single combined administrative motion to seal covering all unopposed sealing requests, and a single combined administrative motion to seal all opposed requests, 21 days after completion of briefing.

NOW, THEREFORE, the Parties stipulate, subject to the Court's approval, the following modifications applicable to sealing procedures relating to dispositive motions and *Daubert* briefing:

- The Parties shall file redacted versions of dispositive motions briefing and *Daubert* briefing as separate entries on the ECF docket;
- The Parties shall also contemporaneously file unredacted copies of all documents on the ECF docket provisionally under seal, along with a one-page interim sealing motion which may indicate that the reasons for sealing will be discussed in a forthcoming Omnibus Sealing Motion;
- The Parties shall jointly file Omnibus Sealing Motions covering the dispositive motions briefing and *Daubert* briefing 21 days after the last of these documents is filed and no later than June 29, 2026;
- The Omnibus Sealing Motions shall include a single combined administrative motion to seal covering all unopposed sealing requests, and a single combined administrative motion to seal covering all opposed requests; and
- The Omnibus Sealing Motions shall include a chart in the format described in the Court's Civil Standing Order Section VII.D and a proposed order as described in that Section.

Date: March 12, 2026

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Respectfully Submitted,

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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: March 12, 2026

/s/ *Sonal N. Mehta*
Sonal N. Mehta

[PROPOSED] ORDER

Pursuant to the Parties' Stipulation, the Court hereby orders the following modifications to the sealing procedures relating to dispositive motions and *Daubert* briefing:

- The Parties shall file redacted versions of dispositive motions briefing and *Daubert* briefing as separate entries on the ECF docket;
- The Parties shall also contemporaneously file unredacted copies of all documents on the ECF docket provisionally under seal, along with a one-page interim sealing motion which may indicate that the reasons for sealing will be discussed in a forthcoming Omnibus Sealing Motion;
- The Parties shall jointly file Omnibus Sealing Motions covering the dispositive motions briefing and *Daubert* briefing 21 days after the last of these documents is filed and no later than June 29, 2026;
- The Omnibus Sealing Motions shall include a single combined administrative motion to seal covering all unopposed sealing requests, and a single combined administrative motion to seal covering all opposed requests; and
- The Omnibus Sealing Motions shall include a chart in the format described in the Court's Civil Standing Order Section VII.D and a proposed order as described in that Section.

IT IS SO ORDERED.

Dated: _____, 2026

_____

THE HONORABLE EUMI K. LEE

United States District Judge