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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

NON-PARTY MUSIC PUBLISHERS' ADMINISTRATIVE MOTION TO CONSIDER WHETHER CASES SHOULD BE RELATED PURSUANT TO CIVIL LOCAL RULES 3-12 AND 7-11

Judge Eumi K. Lee
Magistrate Judge Susan van Keulen

Pursuant to Civil Local Rules 3-12 and 7-11, Non-Parties Sony Music Publishing (US) LLC, Colgems-EMI Music Inc., Combine Music Corp., EMI April Music Inc., EMI Blackwood Music Inc., EMI Consortium Music Publishing, Inc., EMI Consortium Songs, Inc., EMI Entertainment World Inc. d/b/a EMI Pop Music Publishing, EMI Feist Catalog Inc., EMI Gold Horizon Music Corp., EMI Robbins Catalog Inc., EMI U Catalog, Inc., EMI UNART Catalog, Inc., Entertainment World Music Inc., Famous Music LLC, Hipgnosis SC I (Delaware) L.P., Hipgnosis SC II (Delaware) L.P., Hipgnosis Songs Group LLC, Jobete Music Co., Inc., Lyra SA (Delaware) L.P., Lyra SC III (Delaware) L.P., Screen Gems-EMI Music Inc., SMG-Three LLC, Stone Diamond Music Corp., Warner Chappell Music, Inc., Cotillion Music, Inc., Gene Autry's Western Music Publishing Co., Intersong U.S.A., Inc., Ridgeway Music Co., Rightsong Music Inc., Unichappell Music Inc., W Chappell Music Corp. d/b/a WC Music Corp., W.C.M. Music Corp., Walden Music Inc., and Warner-Tamerlane Publishing Corp. (collectively, the "Non-Party Music Publishers"), file this Administrative Motion to Consider Whether Cases Should Be Related.

The Non-Party Music Publishers respectfully request that this Court relate the case *Sony Music Publishing (US) LLC, Warner Chappell Music, Inc. et al. v. Anthropic PBC, et al.*, Case No. 5:26-cv-09217 (N.D. Cal., filed Aug. 28, 2026) (the "*Sony* Action") (Complaint attached as Exhibit A to the Declaration of Bret Matera ("Matera Decl.")), to the instant earliest-filed case *Concord Music Group, Inc., et al. v. Anthropic PBC*, Case No. 5:24-cv-03911-EKL-SVK (N.D. Cal.) ("*Concord I*") and the related actions *Concord Music Group, Inc., et al. v. Anthropic PBC, et al.*, Case No. 5:26-cv-00880-EKL-SVK (N.D. Cal.) ("*Concord II*") and *BMG Rights Management (US) LLC v. Anthropic PBC*, No. 3:26-cv-02334-EKL-SVK (N.D. Cal.) ("*BMG*") (collectively, the "*Concord/BMG* Actions").

STATEMENT

Under Civil Local Rule 3-12(b), "[w]henever a party knows . . . that an action, filed in . . . this district is (or the party believes that the action may be) related to an action which is . . . pending in this District . . . the party must promptly file in the lowest-numbered case an Administrative Motion to Consider Whether Cases Should be Related." An action "is related to another when: (1) [t]he actions concern substantially the same parties, property, transaction, or event; and (2) [i]t

appears likely that there will be an unduly burdensome duplication of labor and expense or conflicting results if the cases are conducted before different Judges." Civ. L.R. 3-12(a).

Non-Party Music Publishers seek to relate cases involving similar copyright infringement claims against the same defendants, based on similar infringing conduct and involving similar types of copyrighted works over similar time periods. Like the *Concord/BMG* Actions, the *Sony* Action alleges that Defendants Anthropic, Dario Amodei, and Benjamin Mann infringed thousands of copyrighted musical compositions (including the lyrics contained therein) owned or controlled by Non-Party Music Publishers in connection with the development and operation of Defendants' Claude AI models. Similar to the claims in *Concord II* and *BMG*, Non-Party Music Publishers allege that Anthropic directly infringed (and, similar to *Concord II*, that Dr. Amodei and Mr. Mann directly and contributorily infringed) by illegally torrenting Non-Party Music Publishers' copyrighted musical compositions from pirate libraries such as Library Genesis and Pirate Library Mirror, in violation of Non-Party Music Publishers' reproduction and distribution rights under 17 U.S.C. §§ 106(1), (3), and 501. Similar to all three of the *Concord/BMG* Actions, Non-Party Music Publishers also allege that Anthropic directly infringed by copying their copyrighted song lyrics in the training and output of its Claude AI models, in violation of their reproduction, distribution, display, and derivative works rights under 17 U.S.C. §§ 106(1)–(3), (5), and 501. Finally, similar to all three of the *Concord/BMG* Actions, Non-Party Music Publishers also allege that Anthropic removes and alters their copyright management information in connection with the training and output of its Claude AI models, in violation of 17 U.S.C. § 1202(b)(1), (3).

Because these cases involve substantially similar allegations and conduct by the same defendants, case relation is appropriate to promote judicial efficiency.

Counsel for Non-Party Music Publishers contacted counsel for Defendants Anthropic, Dario Amodei, and Benjamin Mann on August 28, 2026, and again on August 31, 2026, asking whether they would consent to or oppose this motion. On August 31, 2026, counsel for Anthropic PBC, Robin C. Burrell, communicated via email that they would not oppose this motion, "but reserve the right to respond separately after we have an opportunity to review the content of

publishers' motion." Matera Decl. ¶ 3. Counsel for Defendants Dario Amodei and Benjamin Mann did not state a position on the motion by the time of filing. *Id.* ¶ 4.

CONCLUSION

Non-Party Music Publishers respectfully request that the Court find that the *Sony* Action is related to the *Concord/BMG* Actions under Civil Local Rule 3-12(a).

Dated: August 31, 2026

Respectfully submitted,

/s/ Benjamin S. Akley

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