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

EXHIBIT A TO PARTIES' JOINT OMNIBUS SEALING MOTION

Judge Eumi K. Lee
Magistrate Judge Susan van Keulen

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
Publishers' Motion for Partial Summary Judgment (ECF No. 612 *et seq.*)				
612	Publishers' Motion for Partial Summary Judgment	**Anthropic:** Yellow highlighted portions at pp. 4:19-22, 12:24-13:5, 14:12, 33.	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about Anthropic's training data and the number of times particular pieces of data appear within the training data, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information, including the amount of content included within the guardrails and the dates Anthropic implemented or adjusted guardrails, would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If	

[1] ECF Nos. correspond to docket entries of documents initially filed under seal pursuant to the Court's Order Authorizing Provisional Sealing and Omnibus Sealing Motion, ECF No. 590.

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			publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain confidential non-public information relating to Anthropic's business practices and operations, including specific details related to Claude usage, public disclosure of which would cause competitive harm to Anthropic.	
612-1	Publishers' Moving Separate Statement	**Anthropic:** Yellow highlighted portions at pp. 2, 9, 19-21, 28, 33, 39, 44	**Anthropic:** The highlighted portions of the document contain confidential information about a licensing agreement between Anthropic and a non-party, revealing non-public details about the identity of an Anthropic partner who is not party to this litigation and who has a reasonable expectation that Anthropic will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. The disclosure of this non-public information is likely to result in competitive harm to Anthropic, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Anthropic. The highlighted portions of the document contain highly confidential non-public	**Publishers' Objections:** Yellow highlighted portion at p. 44 (Fact 212): The fact that Anthropic entered into a license is not commercially sensitive and bears directly on Anthropic's willful infringement of Publishers' lyrics and its disclosure would not cause commercial or privacy harm; other large AI companies, including Anthropic's direct competitors Google and OpenAI, publicize their

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			information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's data acquisition strategy, commercialization strategy, and product development strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic. The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's views of its competitors in various product markets. Disclosure of this non-public information is likely to result in competitive harm to Anthropic, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Anthropic. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about sources of training dataset mixes, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this	content-licensing deals.

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			information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the operation, training, and development of Claude's content guardrails. The release of this information would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information, including the dates Anthropic instituted its various guardrails, would harm Anthropic's ability to safeguard	

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			its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain confidential non-public information relating to Anthropic's business practices and operations, including specific and sensitive metrics related to Claude usage, public disclosure of which would cause competitive harm to Anthropic.	
611-3	Ex. 4 – Excerpts of the 30(b)(6) Deposition of Benjamin Mann	**Anthropic:** Yellow highlighted portions at 30:5-18; 31:1-10; 31:17-32:4; 32:18-20; 37:14-38:4; 38:25-39:25; 40:18-25; 41:12-14; 42:17-43:11; 44:24-45:2; 52:1-4; 57:2-58:4; 59:16-18; 69:3-70:6; 71:20-72:10; 73:2-6; 74:1-5; 76:19-79:3; 87:18-20; 95:5-8; 100:17-106:8; 113:21-	**Anthropic**: The highlighted portion of the document contains confidential information about a commercial agreement between Anthropic and a non-party, revealing non-public details about the identity of an Anthropic partner who is not party to this litigation and who has a reasonable expectation that Anthropic will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. The disclosure of this non-public information is likely to result in competitive harm to Anthropic, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in	

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		114:3; 144:10-14; 146:25-2; 148:14-152:5; 204:6-22	competing against or negotiating with Anthropic. The highlighted portions of the document also contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's data acquisition strategy, commercialization strategy, and product development strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about sources of training dataset mixes and methods to obtain that data, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document also contain highly	

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			confidential nonpublic information relating to Anthropic's internal technical operations, internal technical operations, including specific and sensitive details about the operation, training methods, and development of Claude. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models, harming Anthropic.	
611-4	Ex. 5 – Excerpts of the 30(b)(1) Deposition of Benjamin Mann	**Anthropic:** Yellow highlighted portions at 4:2-3; 4:16; 4:20; 40:8-17; 47:23; 56:4-56:25; 73:25-74:11; 76:16-20; 80:8-16; 81:17-82:12; 97:1-100:4; 100:7-100:18	**Anthropic**: The highlighted portion(s) of the document contain(s) highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about sources of training dataset, training dataset mixes, the number of tokens within those data sets, and methods and authorization required to obtain that data, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, internal technical operations, including specific and sensitive details about the	

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			operation, training methods, and development of Claude. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models, harming Anthropic. The highlighted portions of the document contain personally identifiable information of Anthropic's employees. This text should be sealed because it reveals personally identifiable information of Anthropic's employees, who have a legitimate, legally recognized privacy interest in protecting their contact information from public disclosure. If their contact information were to be publicly disclosed, they may be subject to repeated inquiries from the press or members of the general public, which could rise to the level of threats or harassment, given the current media attention on Anthropic. *See, e.g.*, *Benedict v. Hewlett-Packard Co.*, 2014 WL 233827, at *3 (N.D. Cal. Jan. 21, 2014) (granting motion to seal personal information, including a home address, phone number, and email address).	
611-5	Ex. 6 – Excerpts of the 30(b)(1) Deposition of Jared Kaplan	**Anthropic:** Yellow highlighted portions at 245:1; 245:6-10; 245:14; 246:11-12; 247:12-13; 247:17-19;	**Anthropic**: The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding	

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		248:3-4; 248:24-25; 253:21-23; 254:5-13; 255:5-8; 255:10-11; 256:1-2; 256:7-10; 256:19-22; 258:11; 258:18-20; 259:13-17; 259:21-22; 260:13-15; 303:11	Anthropic's product development strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic. The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's views of its competitors in various product markets. Disclosure of this non-public information is likely to result in competitive harm to Anthropic, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Anthropic. The highlighted portions of the document contain personally identifiable information of Anthropic's employees. This text should be sealed because it reveals personally identifiable information of Anthropic's employees, who have a legitimate, legally recognized privacy interest in protecting their contact information from public disclosure. If their contact information were to be publicly disclosed, they may be subject to repeated inquiries from the press or members of the general public, which could rise to the level of threats or harassment, given the	

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			current media attention on Anthropic. See, e.g., *Benedict v. Hewlett-Packard Co.*, 2014 WL 233827, at *3 (N.D. Cal. Jan. 21, 2014) (granting motion to seal personal information, including a home address, phone number, and email address).	
611-6	Ex. 7 – Excerpts of the 30(b)(6) Deposition of Thomas Turvey	**Anthropic:** Yellow highlighted portions at 21:3-22:22; 23:12-24:9; 24:13-26:18; 26:23-27:12; 33:6-7; 33:18; 34:8-9; 34:20-22 35:1-35:2; 35:4-35:7; 35:9-11; 35:13-22; 35:24-36:7; -38:2-40:2; 40:5-41:23; 42:1-15; 65:1-4; 65:7-11; 65:14-23; 68:15-:25; 93:1-94:4; 94:11-95:2; 95:20-22; 95:25-96:5; 96:8; 96:13; 112:17-20	**Anthropic:** The highlighted portions of the document contain confidential information about a licensing agreement between Anthropic and a non-party, revealing non-public details about the identity of an Anthropic partner who is not party to this litigation and who has a reasonable expectation that Anthropic will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. This text also reveals confidential, non-public information about the terms and conditions of the agreement, including pricing and business strategy. The disclosure of this non-public information is likely to result in competitive harm to Anthropic, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Anthropic. The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific	

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			information regarding Anthropic's finances and data acquisition strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic.	
611-8	Ex. 9 – Excerpts of the 30(b)(1) Deposition of Deep Ganguli	**Anthropic:** Yellow highlighted portions at 218:18-19	**Anthropic:** The highlighted portion of the document contains confidential non-public information relating to Anthropic's business practices and operations, including specific and sensitive metrics related to Claude usage, public disclosure of which would cause competitive harm to Anthropic.	
611-9	Ex. 10 – Excerpts of the 30(b)(1) Deposition of Daniela Amodei	**Anthropic:** Yellow highlighted portions at pp. 141-143	**Anthropic:** The highlighted portion of the document contains personally identifiable information of Anthropic's employees. This text should be sealed because it reveals personally identifiable information of Anthropic's employees, who have a legitimate, legally recognized privacy interest in protecting their contact information from public disclosure. If their contact information were to be publicly disclosed, they may be subject to repeated inquiries from the press or members of the general public, which could rise to the level of threats or harassment, given the current media attention on Anthropic. See, e.g., *Benedict v. Hewlett-Packard Co.*, 2014 WL 233827, at *3 (N.D. Cal. Jan. 21, 2014) (granting motion to seal	

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			personal information, including a home address, phone number, and email address).	
611-11	Ex. 12 – Excerpts of the 30(b)(1) Deposition of Pranay Sangani	**Anthropic:** Yellow highlighted portions at 201:1-11; 201:13-202:2; 203:20-204:6; 204:9-18; 204:20-25	**Anthropic:** The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's data acquisition strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about sources of training dataset mixes and methods to obtain that data, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
611-12	Ex. 13 – Excerpts of the 30(b)(1) Deposition	**Anthropic:** Yellow highlighted portions at pp. 16; 37-38.	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical	

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	of Dario Amodei		operations, including specific and sensitive details about the functionality of Anthropic's content guardrails and defense systems and where in the development process such systems are deployed. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models, harming Anthropic. The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's product development strategy and risk considerations with respect to launching new products, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic.	
611-13	Ex. 14 – Excerpts of the 30(b)(6) Deposition of Tom Brown	**Anthropic:** Yellow highlighted portions at 205:2; 305:21-308:15	**Anthropic:** The highlighted portions of the document contain personal financial information of Anthropic's employees. This text should be sealed because the personal financial information of non-party Anthropic employees is not relevant to any issue in the case, and Anthropic employees have a legitimate privacy interest in protecting their personal	**Publishers' Objections:** Yellow highlighted portions at 205:2: The value of Anthropic's co-founders' equity in the company is not confidential and has been

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			financial information from public disclosure. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information, including the specific technical thresholds used in the guardrails and Anthropic's guardrails strategy, would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	widely reported on. *See, e.g.*, Richard Nieva, *Fortunes of Anthropic's Seven Cofounders More Than Double After Blockbuster Fundraiser*, FORBES (May 29, 2026), https://www.forbes.com/sites/richardnieva/2026/05/29/anthropics-cofounders-worth/; Biz Carson and Tom Maloney, BLOOMBERG (May 29, 2026), https://www.bloomberg.com/news/articles/2026-05-29/anthropic-co-founders-worth-8-billion-each-after-funding-round.
611-14	Ex. 15 – Excerpts of the Deposition of Donald (Duff) Berschback	**Publishers:** Blue highlighted portions at 161:24-172:25; 173:1-176:25; 205:1-9.	**Publishers:** Discloses confidential and non-public details about Publisher licensing practices, negotiations with potential licensees, business strategies, financial information, including trade secrets and Publisher revenues; highly confidential, non-public, and commercially sensitive information concerning Publishers' enforcement practices and investigations into infringement.	

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			Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers. Public disclosure of this information would cause harm to Publishers arising from potential infringers seeking to avoid detection of potential or ongoing infringement of Publishers' copyrights.	
611-15	Ex. 16 – Excerpts of the Expert Deposition of Abhishek Nagaraj, PhD	**Anthropic:** Yellow highlighted portions at 157:19-23; 158:02-07; 158:10-21; 158:25-159:03	**Anthropic:** The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's data acquisition strategy and product development strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic.	
611-16	Ex. 17 – Expert Report of Abhishek Nagaraj, PhD	**Publishers:** Blue highlighted portions at ¶¶ 68-69 & nn.111, 112, 113, 116; nn.123, 124; ¶	**Publishers:** Discloses confidential and non-public details about Publisher licensing practices, business strategies and rationales, confidential discussions with licensing counterparties, and financial information, including	**Publishers' Objections:** Yellow highlighted portion at ¶ 73: The information is not confidential;

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		78; ¶ 91; ¶¶ 94-99 & nn.136-38, nn. 140-41; nn.143, 145; Figures 1 & 2; ¶ 100; pp. 77-78. **Anthropic:** Yellow highlighted portions at 23 & n.39; 36, 37 & n.47; 40 & n.56; 42 n.58; 46 & nn.68-69; 49 & n.77; 55; 56 & nn.81, 84-85; 58 & nn.88-91; 59 & n.93; 73; 80 & n.128; 111, 112, 113 n. 73; 115; 121, 123 & n.182, 135 & n.189; 136, 143, 156, 159, 160, 161, 166, 176, 177, 178, 179, 180, 181.	trade secrets and various revenues data. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers. **Anthropic:** The highlighted portions of the document contain confidential information about a licensing agreement between Anthropic and a non-party, revealing non-public details about the identity of an Anthropic partner who is not party to this litigation and who has a reasonable expectation that Anthropic will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. The disclosure of this non-public information is likely to result in competitive harm to Anthropic, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Anthropic. The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes,	Anthropic's entry into agreements is generic and stale information, disclosure of which would not threaten any commercial or privacy harm. Yellow highlighted portion at ¶ 80: The information reflects only high-level assertions about Anthropic's motivations for entering into agreements, does not disclose information about specific deals, and its disclosure would not cause commercial or privacy harm.

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			and strategy, including specific information regarding Anthropic's data acquisition strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about sources of training dataset mixes and methods to obtain that data, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information, including the content included in the guardrails, would harm Anthropic's ability to	

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			safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
611-19	Ex. 20 – Excerpts of the 30(b)(6) Deposition of Vinay Rao	**Anthropic:** Yellow highlighted portions at 47:16-48:23; 81:13-84:20; 93:25-100:23; 121:19-124:25	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information, including Anthropic's risk tolerance and approach to guardrails development/tuning, the amount of content included within the guardrails, the dates Anthropic implemented or adjusted guardrails, and specific technical thresholds used in the guardrails, would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in	

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			training their generative AI models.	
611-21	Ex. 23 – Sangani 128, Anthropic_ 0000346083	**Anthropic:** Yellow highlighted portions at pp. 2-4	**Anthropic:** The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's data acquisition strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about sources of training dataset mixes and methods to obtain that data, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
611-22	Ex. 24 – Anthropic_ 0000343228	**Anthropic:** Entire document	**Anthropic:** The document contains highly confidential nonpublic information relating to Anthropic's internal technical	

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			operations, including specific and sensitive details about methods to obtain that data, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
611-23	Ex. 25 – Defendant Anthropic PBC's Amended Supplemental Response to Publishers' Interrogatories 9, 11, 12	**Anthropic:** Highlighted portions at pp. 12-14	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information, including the amount of content included within the guardrails, the dates Anthropic implemented or adjusted guardrails, and specific technical thresholds used in the guardrails, would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
611-25	Ex. 27 – Anthropic_	**Anthropic:** Entire document	**Anthropic:** The document contains confidential non-public information relating to	

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	0000570510		Anthropic's business practices and operations, including specific and sensitive metrics related to Claude usage and the number of customers, public disclosure of which would cause competitive harm to Anthropic, and the contents of specific prompts and outputs, public disclosure of which would unduly intrude on the privacy of third-party Claude users.	
611-26	Ex. 28 – Anthropic_000057051 1	**Anthropic:** Entire document	**Anthropic:** The document contains confidential non-public information relating to Anthropic's business practices and operations, including specific and sensitive metrics related to Claude usage and the number of customers, public disclosure of which would cause competitive harm to Anthropic, and the contents of specific prompts and outputs, public disclosure of which would unduly intrude on the privacy of third-party Claude users.	
611-27	Ex. 29 – Defendant Anthropic PBC's Amended Supplemental Response to Publishers' Interrogatory No. 4	**Anthropic:** Highlighted portions at pp. 7-8	**Anthropic:** The highlighted portions of the document contain confidential non-public information relating to Anthropic's business practices and operations, including specific and sensitive metrics related to Claude usage in the form of the total number of prompts entered on both Claude.ai and first-party Claude API on a monthly basis from April 2023 to November 2024, public disclosure of which would cause competitive harm to Anthropic.	
611-28	Ex. 30 – Anthropic_	**Anthropic:** Entire document	**Anthropic:** The document contains confidential non-public information relating to	

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	0000429489		Anthropic's business practices and operations, including specific and sensitive metrics related to Claude usage and its internal analysis of those metrics, public disclosure of which would cause competitive harm to Anthropic.	
611-29	Ex. 31 – Anthropic_000042948 2	**Anthropic:** Entire document	**Anthropic:** The document contains confidential non-public information relating to Anthropic's business practices and operations, including specific and sensitive metrics related to Claude usage and its internal analysis of those metrics, public disclosure of which would cause competitive harm to Anthropic.	
611-30	Ex. 32 – Anthropic_000042948 5	**Anthropic:** Entire document	**Anthropic:** The document contains confidential non-public information relating to Anthropic's business practices and operations, including specific and sensitive metrics related to Claude usage and its internal analysis of those metrics, public disclosure of which would cause competitive harm to Anthropic.	
611-31	Ex. 33 – Anthropic_000042948 6	**Anthropic:** Entire document	**Anthropic:** The document contains confidential non-public information relating to Anthropic's business practices and operations, including specific and sensitive metrics related to Claude usage and its internal analysis of those metrics, public disclosure of which would cause competitive harm to Anthropic.	
611-32	Ex. 34 – Anthropic_000042948 8	**Anthropic:** Entire document	**Anthropic:** The document contains confidential non-public information relating to Anthropic's business practices and operations, including specific and sensitive metrics related to Claude usage and its internal analysis of those metrics, public	

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			disclosure of which would cause competitive harm to Anthropic.	
611-33	Ex. 35 – Anthropic_0000429490	**Anthropic:** Entire document	**Anthropic:** The document contains confidential non-public information relating to Anthropic's business practices and operations, including specific and sensitive metrics related to Claude usage and its internal analysis of those metrics, public disclosure of which would cause competitive harm to Anthropic.	
611-38	Ex. 40 – Anthropic_0000217166	**Anthropic:** Entire document	**Anthropic:** The document contains highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the operation, training methods, and development of Claude, specifically details about Anthropic's deployment testing, deployment metrics, and safety objectives. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models, harming Anthropic. The document contains highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's product deployment strategy and development of product features for particular clients, public disclosure of which would cause competitive harm to Anthropic. Anthropic's	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic.	
611-39	Ex. 41 – Anthropic_000060570 0	**Anthropic:** Yellow highlighted portion at pp. 2-11, 13-14, 17-22, 24-32, 37-44, 46-60, 63-68, 70-75, 77-79, 81-87	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the finetuning process, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the operation, training, and development of Claude's content guardrails. The release of this information would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			training their generative AI models. The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal technical operations, including specific and sensitive details about the internal data storage locations on Anthropic's servers and the datasets stored at those locations, public disclosure of which would harm Anthropic's ability to maintain proper security over its data by providing bad actors with the information needed to attempt to access those locations. The highlighted portions of the document contain confidential non-public information relating to Anthropic's business practices and operations, including specific and sensitive metrics related to Claude usage, public disclosure of which would cause competitive harm to Anthropic.	
611-40	Ex. 42 – Anthropic_00005996 47	**Anthropic:** Yellow highlighted portions at pg.1	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
611-41	Ex. 43 – Anthropic_0000458427	**Anthropic:** Entire document	**Anthropic**: This document contains highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's commercialization strategy and product development strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic. The document contains highly confidential non-public information relating to Anthropic's views of its competitors in various product markets. Disclosure of this non-public information is likely to result in competitive harm to Anthropic, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Anthropic.	
611-43	Ex. 45 – Anthropic_	**Anthropic:** Yellow highlighted	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
	0000226164	portions at pp. 1-3	information relating to Anthropic's internal technical operations, including specific and sensitive details about the operation, training, and development of Claude's content guardrails. The release of this information, including information about the types of attacks Anthropic is susceptible to, would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
611-44	Ex. 46 – Anthropic_ 0000443204	**Anthropic:** Entire document	**Anthropic:** The document contains highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's product development strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic. The document contains highly confidential non-public information relating to Anthropic's views of its	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			competitors in various product markets. Disclosure of this non-public information is likely to result in competitive harm to Anthropic, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Anthropic.	
611-46	Ex. 48 – Defendant Anthropic's Amended Supplemental Response to Publishers' Interrogatory No. 12	**Anthropic:** Yellow highlighted portion at pg. 6	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information, including the amount of content included within the guardrails and the dates Anthropic implemented or adjusted guardrails, would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
611-47	Ex. 49 – Anthropic_000024217 3	**Anthropic:** Entire document	**Anthropic:** The document contains highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			development of technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
611-48	Ex. 50 – Anthropic_000047748 6	**Anthropic:** Entire document	**Anthropic:** The document contains highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the operation and development of Claude, including it's content guardrails and defense systems. The release of this information, including details about guardrail features, how guardrails are deployed across various products, and areas for future improvements, would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models, harming Anthropic.	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			The document contains highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's Trust & Safety strategy and allocation of resources within its Trust & Safety department, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic.	
611-49	Ex. 53 – Anthropic_000047827 1	**Anthropic:** Yellow highlighted portions at pp. 3, 5-6, 9-10, 12, 19-21, 24-26, 33-34, 38, 41-43, 49, 55-56, 58-60, 64, 67-76, 79, 81	**Anthropic**: The highlighted portions of the document contain confidential information about a commercial agreement between Anthropic and a non-party, revealing non-public details about the identity of an Anthropic partner who is not party to this litigation and who has a reasonable expectation that Anthropic will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. The disclosure of this non-public information is likely to result in competitive harm to Anthropic, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Anthropic.	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's data acquisition strategy, commercialization strategy, and product development strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic. The highlighted portion of the document contains highly confidential non-public information relating to Anthropic's internal technical operations, including specific and sensitive details about the internal data storage locations on Anthropic's servers and the datasets stored at those locations, public disclosure of which would harm Anthropic's ability to maintain proper security over its data by providing bad actors with the information needed to attempt to access those locations. The highlighted portions of the document contain confidential non-public information relating to Anthropic's business practices and operations, including specific and sensitive metrics related to	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			Claude usage, public disclosure of which would cause competitive harm to Anthropic.	
611-50	Ex. 54 – Anthropic_000052594 7	**Anthropic:** Yellow highlighted portion at p. 7	**Anthropic:** The highlighted portion of the document contains highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about internal model identifiers and software architecture Anthropic uses to develop, train, and evaluate its models, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
611-51	Ex. 55 – Anthropic_000045916 2	**Anthropic:** Yellow highlighted portions at pp. 3-7, 13-14	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about source code, internal tooling, and software architecture Anthropic uses to develop, train, and evaluate its models, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			The highlighted portion of the document contains highly confidential non-public information relating to Anthropic's internal technical operations, including specific and sensitive details about the internal data storage locations on Anthropic's servers and the datasets stored at those locations, public disclosure of which would harm Anthropic's ability to maintain proper security over its data by providing bad actors with the information needed to attempt to access those locations.	
611-52	Ex. 56 – Anthropic_000055436 6	**Anthropic:** Yellow highlighted portions at pp. 17, 19, 21-23	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about source code, internal tooling, and software architecture Anthropic uses to develop, train, and evaluate its models, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal technical operations, including specific and sensitive details about the internal data storage locations on	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			Anthropic's servers and the datasets stored at those locations, public disclosure of which would harm Anthropic's ability to maintain proper security over its data by providing bad actors with the information needed to attempt to access those locations	
611-53	Ex. 57 – Anthropic_ 0000526003	**Anthropic:** Yellow highlighted portions at pp. 2, 9-10, 12, 15, 20, 24	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about source code, internal tooling, and software architecture Anthropic uses to develop, train, and evaluate its models, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain personally identifiable information of Anthropic's employees. This text should be sealed because it reveals personally identifiable information of Anthropic's employees, who have a legitimate, legally recognized privacy interest in protecting their contact information from public disclosure. If their contact information were to be publicly disclosed, they may be subject to repeated inquiries from the press or members of the general public,	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			which could rise to the level of threats or harassment, given the current media attention on Anthropic. See, e.g., *Benedict v. Hewlett-Packard Co.*, 2014 WL 233827, at *3 (N.D. Cal. Jan. 21, 2014) (granting motion to seal personal information, including a home address, phone number, and email address).	
611-57	Ex. 61 – Anthropic_ 0000554980	**Anthropic:** Yellow highlighted portions at pp. 1-13	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about internal model identifiers and software architecture Anthropic uses to develop, train, and evaluate its models, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
611-58	Ex. 62 – Anthropic_ 0000527903	**Anthropic:** Yellow highlighted portions at pp. 3, 10-11, 13, 18, 23-26	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the source code, internal tooling, internal model identifiers, and software architecture Anthropic uses to develop, train, and evaluate its models, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
611-60	Ex. 64 – Anthropic_000045924 9	**Anthropic:** Yellow highlighted portions at pp. 2, 5, 6, 8-23, 25, 29-44	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about source code, internal tooling, and software architecture Anthropic uses to develop, train, and evaluate its models, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain personally identifiable information of Anthropic's employees. This text should be sealed because it reveals personally identifiable information of Anthropic's employees, who have a legitimate, legally recognized privacy interest in protecting their contact information from public disclosure. If their contact information were to be publicly disclosed, they may be subject to repeated inquiries from the press or members of the general public, which could rise to the level of threats or harassment, given the	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			current media attention on Anthropic. See, e.g., *Benedict v. Hewlett-Packard Co.*, 2014 WL 233827, at *3 (N.D. Cal. Jan. 21, 2014) (granting motion to seal personal information, including a home address, phone number, and email address).	
611-61	Ex. 65 – Anthropic_000055730 4	**Anthropic:** Yellow highlighted portions at pp. 2-3, 5-7, 11-56	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the source code, internal tooling, internal model identifiers, and software architecture Anthropic uses to develop, train, and evaluate its models, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
611-62	Ex. 66 – Anthropic_000045954 3	**Anthropic:** Yellow highlighted portion at pp. 2-20, 24-36, 38-62, 68-102, 107-109, 113-120, 122-124, 127-147, 151-203, 206-215, 226-230, 232-233, 235-236, 238, 240, 243, 245-246, 250, 254, 256, 258,	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the source code, internal tooling, internal model identifiers, and software architecture Anthropic uses to develop, train, and evaluate its models, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
		260, 262, 264, 266, 269, 272	decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
611-63	Ex. 67 – Anthropic_ 000055735 9	**Anthropic:** Yellow highlighted portion at pp. 1, 69, 79, 86, 94, 110, 112, 123, 185, 200, 225-226, 231, 242-244, 246-255, 257-263, 265-275, 277-279, 282-296, 300-330, 334-341	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about source code and internal model identifiers, Anthropic uses to develop, train, and evaluate its models, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
611-64	Ex. 68 – Anthropic_ 000055701 5	**Anthropic:** Yellow highlighted portion at pp. 6, 7-9, 15, 17-19, 21, 30-31	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details source code, internal tooling, internal model identifiers, and software architecture Anthropic uses to develop, train, and evaluate its models, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			Anthropic's competitors in training their generative AI models.	
611-65	Ex. 69 – Anthropic_0000241820	**Anthropic:** Yellow highlighted portion at pp. 5-26, 29-43, 45-52, 54-58, 50-67	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the internal model identifiers and software architecture Anthropic uses to develop, train, and evaluate its models, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
611-66	Ex. 70 – Anthropic_0000459487	**Anthropic:** Yellow highlighted portion at pp. 7, 11	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the internal model identifiers and software architecture Anthropic uses to develop, train, and evaluate its models, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
611-067	Ex. 71 – Anthropic_	**Anthropic:** Yellow	**Anthropic:** The highlighted portions of the document contain	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
	0000554769	highlighted portions at pp. 2-8, 9-45, 47-70, 72-74, 77-84, 86-90	highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the source code, internal tooling, internal model identifiers, and software architecture Anthropic uses to develop, train, and evaluate its models, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal technical operations, including specific and sensitive details about the internal data storage locations on Anthropic's servers and the datasets stored at those locations, public disclosure of which would harm Anthropic's ability to maintain proper security over its data by providing bad actors with the information needed to attempt to access those locations.	
611-68	Ex. 72 – Anthropic_000055440 5	**Anthropic:** Yellow highlighted portions at pp. 12, 22	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the internal model identifiers and software architecture Anthropic uses to	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			develop, train, and evaluate its models, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain personally identifiable information of Anthropic's employees. This text should be sealed because it reveals personally identifiable information of Anthropic's employees, who have a legitimate, legally recognized privacy interest in protecting their contact information from public disclosure. If their contact information were to be publicly disclosed, they may be subject to repeated inquiries from the press or members of the general public, which could rise to the level of threats or harassment, given the current media attention on Anthropic. See, e.g., *Benedict v. Hewlett-Packard Co.*, 2014 WL 233827, at *3 (N.D. Cal. Jan. 21, 2014) (granting motion to seal personal information, including a home address, phone number, and email address).	
611-69	Ex. 74 – Anthropic_00004584 91	**Anthropic:** Entire Document	**Anthropic:** The document contains highly confidential non-public information relating to Anthropic's views of its competitors and technical testing related to the same. Disclosure of this non-public information is	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			likely to result in competitive harm to Anthropic, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Anthropic. The document also contains highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the training methods and development of Claude. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models, harming Anthropic.	
611-70	Ex. 75 – Anthropic_00005077 50	**Anthropic:** Yellow highlighted portions throughout.	**Anthropic:** The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's commercialization strategy and product development strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic. The highlighted portions of the document also contain highly	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the operation, training methods, and development of Claude. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models, harming Anthropic.	
611-90	Ex. 97 – Anthropic_000044496 7	**Anthropic:** Entire document	**Anthropic:** The document contains highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's finances and funding strategy, data acquisition strategy, commercialization strategy, and product development strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic.	
611-91	Ex. 98 – Anthropic_000021698 7	**Anthropic:** Entire document	**Anthropic:** The document contains highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's finances, data acquisition strategy, commercialization strategy, and product	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			development strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic. The document contains highly confidential non-public information relating to Anthropic's views of its competitors in various product markets. Disclosure of this non-public information is likely to result in competitive harm to Anthropic, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Anthropic. The document also contains highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about sources of training dataset mixes and methods to obtain that data, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
611-92	Ex. 100 – Anthropic_000044164 9	**Anthropic:** Entire document	**Anthropic:** The document contains highly confidential non-public information relating to Anthropic's internal business	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			operations, systems, processes, and strategy, including specific information regarding Anthropic's finances public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic.	
611-93	Ex. 101 – Compilation of Publishers' LyricFind Licenses	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets comprising licensing terms with non-party, information about the scope of the agreements, rights granted, permissible uses, fees, payment structures, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
611-94	Ex. 102 – Compilation of Publishers' Musixmatch Licenses	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets comprising licensing terms with non-party, information about the scope of the agreements, rights granted, permissible uses, fees, payment structures, and other confidential information.	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
611-95	Ex. 103 – Compilation of Additional Licenses for Lyrics Display	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information comprising licensing terms with non-party, information about the scope of the agreements, rights granted, permissible uses, fees, payment structures, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
611-97	Ex. 105 – Anthropic_0000441309	**Anthropic:** Entire document	**Anthropic:** The document contains highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's internal development and personnel strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal,	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic.	
611-98	Ex. 106 – Anthropic_000042948 4	**Anthropic:** Entire document	**Anthropic:** The document contains confidential non-public information relating to Anthropic's business practices and operations, including specific and sensitive metrics related to Claude usage and its internal analysis of those metrics, public disclosure of which would cause competitive harm to Anthropic.	
611-102	Ex. 112 – UMPG_000 0024457	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information comprising licensing terms with non-party, information about the scope of the agreements, rights granted, permissible uses, financial information, and trade secrets comprising fees, payment structures, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
611-103	Ex. 113 – UMPG_000 0025119	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets comprising licensing terms with non-party, information about the scope of the agreements, rights granted,	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			permissible uses, fees, payment structures, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
611-104	Ex. 114 – Anthropic_000042949 6	**Anthropic:** Entire document	**Anthropic:** The document contains confidential information about a licensing agreement between Anthropic and a non-party, revealing non-public details about the identity of an Anthropic partner who is not party to this litigation and who has a reasonable expectation that Anthropic will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. This text also reveals confidential, non-public information about the terms and conditions of the agreement, including pricing. The disclosure of this non-public information is likely to result in competitive harm to Anthropic, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Anthropic.	
611-106	Ex. 117 – Excerpts of the 30(b)(6)	**Publishers:** Blue highlighted	**Publishers:** Discloses confidential and non-public details about Publisher	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
	Deposition of David Kokakis	portions at 161:1–164:25, 197:1–200:25, 209:1–212:25; 221:1–222:25; 223:6–224:25, 297:24–298:10; 298:19–300:25.	licensing practices, business strategies, the scope of rights typically granted to licensees, confidential discussions with licensing counterparties and potential counterparties, and communications practices with songwriters. Public disclosure of this commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
611-107	Ex. 118 – Excerpts of the 30(b)(6) Deposition of Alisa Coleman	**Publishers:** Blue highlighted portions at 169:1–171:10, 178:14-16; 178:24–180:25.	**Publishers:** Discloses confidential and non-public details about Publisher business practices and strategies, including analyses of market trends, communications with licensees and songwriters. Public disclosure of this commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
611-108	Ex. 119 – Excerpts of the 30(b)(1) Deposition of Thomas Turvey	**Anthropic:** Yellow highlighted portion at 65:1-4, 65:7-19, 65:22-66:7, 67:1-2, 67:4-14, 67:17-19, 68:1-	**Anthropic:** The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
		69:6, 69:9-70:22, 71:8-72:11, 72:13-16	Anthropic's data acquisition strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic.	
611-109	Ex. 121 – Compilation of ABKCO Licensing Agreements	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets comprising licensing terms with non-party, information about the scope of the agreements, rights granted, permissible uses, fees, payment structures, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
611-110	Ex. 122 – Compilation of UMPG Licensing Agreements	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets comprising licensing terms with non-party, information about the scope of the agreements, rights granted, permissible uses, fees, payment structures, and other confidential information. Public disclosure of these trade	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
611-111	Ex. 123 – Compilation of CCMG Licensing Agreements	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information comprising licensing terms with non-party, information about the scope of the agreements, rights granted, permissible uses, financial information, including trade secrets, comprising fees, payment structures, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
Declaration of Alisa Coleman in Support of Plaintiffs' Motion for Partial Summary Judgment (ECF No. 613 *et seq.*)				
613	Declaration of Alisa Coleman in Support of Plaintiffs' Motion for Partial Summary Judgment	**Publishers:** Blue highlighted portions at ¶¶ 24–25.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive licensing terms, including information about the scope of the agreements, rights granted, permissible uses, rights and obligations, and other confidential information. Public disclosure of this	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
613-1	Ex. A – Musixmatch License Agreement	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive licensing terms, including information about the scope of the agreements, rights granted, permissible uses, financial information, including trade secrets, comprising fees, payment structures, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
613-2	Ex. B – Genius License Agreement	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information comprising licensing terms with non-party, information about the scope of the agreements, rights granted, permissible uses, financial information, including trade secrets, comprising fees, payment structures, and other confidential information. Public disclosure of these trade	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
Declaration of William Pittenger in Support of Plaintiffs' Motion for Partial Summary Judgment (ECF No. 614 *et seq*.)				
614-1	Ex. ABKCO–15B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information comprising agreement terms negotiated with non-party, rights granted and retained, term length, territories affected, relevant works, financial information, including trade secrets, comprising payments, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
614-2	Ex. ABKCO–16B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising agreement terms negotiated with non-party, rights granted and retained, term length, territories affected, relevant works, payments, and other confidential information.	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
614-3	Ex. ABKCO–17B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising agreement terms negotiated with non-party, rights granted and retained, term length, territories affected, relevant works, payments, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
Declaration of Duff Berschback in Support of Plaintiffs' Motion for Partial Summary Judgment (ECF No. 616 *et seq.*)				
616	Declaration of Duff Berschback in Support of Plaintiffs' Motion for Partial Summary Judgment	**Publishers:** Blue highlighted portions at ¶¶ 47–48, 50–51.	**Publishers:** Discloses confidential and non-public details about discussions with potential licensing counterparties, including AI entities. Public disclosure of this commercially sensitive information would cause harm to	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
616-1	Ex. A – Concord Lyrics Display License with Genius	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets comprising licensing terms with non-party, information about the scope of the agreements, rights granted, permissible uses, fees, payment structures, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
616-2	Ex. B – Concord Lyrics Display License with Musixmatch	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets comprising licensing terms with non-parties, information about the scope of the agreements, rights granted, permissible uses, fees, payment structures, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
616-3	Ex. Concord–10B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising agreement terms negotiated with non-party, rights granted and retained, term length, territories affected, relevant works, payments, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
616-4	Ex. Concord–12B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information comprising purchase agreement terms, information about the scope of the agreements, assets acquired, rights acquired, financial information, including trade secrets, comprising purchase price and fees, payment structure, rights and obligations, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
616-5	Ex. Concord–13B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information comprising licensing terms with non-party, information about the scope of the agreements, rights granted, permissible uses, financial information, including trade secrets, comprising fees, payment structures, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
616-6	Ex. Concord–14B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information comprising agreement terms negotiated with non-party, rights granted and retained, term length, territories affected, relevant works, financial information, including trade secrets, comprising payments, as well as other confidential information. Public disclosure of these trade secrets and other commercially	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
N/A [2]	Ex. Concord–16B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising purchase agreement terms, information about the scope of the agreements, assets acquired, rights acquired, purchase price and fees, payment structure, rights and obligations, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
616-7	Ex. Concord–17B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information comprising purchase agreement terms, information about the scope of the agreements, assets acquired, rights acquired, financial information, including trade secrets, comprising purchase price and fees, payment structure, rights and obligations, and other	

[2] Previously sealed version was inadvertently omitted from the docket.

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
616-8	Ex. Concord–18B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising agreement terms negotiated with non-party, information about equity interests, tax information, debts, legal proceedings, insurance, royalty information, bank accounts, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
616-9	Ex. Concord–19B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information comprising agreement terms negotiated with non-party, rights granted and retained, term length, territories affected, relevant works, financial information, including trade secrets, comprising payments, as	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			well as other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
616-10	Ex. Concord–20B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising purchase agreement terms, information about the scope of the agreements, assets acquired, rights acquired, purchase price and fees, payment structure, rights and obligations, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
616-11	Ex. Concord–21B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising purchase agreement terms, information about the scope of the agreements, assets acquired, rights acquired, purchase price	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			and fees, payment structure, rights and obligations, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
616-12	Ex. Concord–22B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising purchase agreement terms, information about the scope of the agreements, assets acquired, rights acquired, purchase price and fees, payment structure, rights and obligations, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
616-13	Ex. Concord–23B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising agreement terms negotiated with non-party, information about rights and obligations between	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			contributors, contribution of assets, equity interests, tax information, debts and liens, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
616-14	Ex. Concord–24B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising purchase agreement terms, information about the scope of the agreements, assets acquired, rights acquired, purchase price and fees, payment structure, rights and obligations, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
616-15	Ex. Concord–25B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising purchase agreement terms, information about the scope of	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			the agreements, assets acquired, rights acquired, purchase price and fees, payment structure, rights and obligations, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
616-16	Ex. Concord–26B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising purchase agreement terms, information about the scope of the agreements, assets acquired, rights acquired, purchase price and fees, payment structure, rights and obligations, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
616-17	Ex. Concord–27B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information comprising agreement terms negotiated with non-party, rights granted and	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			retained, term length, territories affected, relevant works, financial information, including trade secrets, comprising payments, as well as other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
616-18	Ex. Concord–28B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising agreement terms negotiated with non-party, rights granted and retained, term length, territories affected, relevant works, payments, as well as other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
N/A [3]	Ex. Concord–29B –	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including	

[3] Previously sealed version was inadvertently omitted from the docket.

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
	Ownership Documents		trade secrets, comprising agreement terms negotiated with non-party, rights granted and retained, term length, territories affected, relevant works, payments, as well as other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
616-19	Ex. Concord–30B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising share purchase agreement terms, information about the scope of the agreements, assets acquired, rights acquired, payment and royalty structure, rights and obligations, and other confidential information; Discloses highly confidential, non-public, and commercially sensitive terms, including rights granted and retained, term length, territories affected, relevant works, payments, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
616-20	Ex. Concord–31B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising agreement terms negotiated with non-party, rights granted and retained, term length, territories affected, relevant works, payments, as well as other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
Declaration of Kenton Draughon in Support of Plaintiff's Motion for Partial Summary Judgment (ECF No. 619 *et seq*.)				
619	Declaration of Kenton Draughon in Support of Plaintiffs' Motion for Partial Summary Judgment	**Publishers:** Blue highlighted portions at ¶ 43.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets and details about license negotiations with a third party and the value of CCMG's works in the context of those negotiations. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			gain insight into business strategies to undercut and unfairly outcompete Publishers.	
619-9	Ex. CCMG–19B – Ownership Documents	**Publishers:** Documents bearing Bates numbers CCMG_-504 through CCMG_-583.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising purchase agreement terms, information about the scope of the agreements, assets acquired, rights acquired, purchase price and fees, payment structure, rights and obligations, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
619-10	Ex. CCMG–21B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising purchase agreement terms, information about the scope of the agreements, assets acquired, rights acquired, purchase price and fees, payment structure, rights and obligations, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
619-11	Ex. CCMG–22B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising purchase agreement financial terms and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
Declaration of Dr. Michael Smith in Support of Plaintiffs' Motion for Partial Summary Judgment (ECF No. 605 *et seq.*)				
605	Declaration of Dr. Michael Smith in Support of Plaintiffs' Motion for Partial Summary Judgment	**Publishers:** Blue highlighted portions at ¶¶ 13–14; n.17; ¶ 21 & n.18; ¶ 24 & n.21; ¶ 26 & n.22; ¶ 52 & nn.66, 70; ¶ 57 & n. 75; ¶¶ 78–80; ¶ 103; n.138; ¶ 105. **Anthropic:** Yellow highlighted portions at ¶¶ 61, 64, 83 n.105, 91, 92 & nn.110, 111; 93;	**Publishers:** Discloses confidential and non-public details about Publisher licensing practices, business strategies and rationales, confidential discussions with licensing counterparties, revenues, and expected revenues. Discloses highly confidential, non-public, and commercially sensitive licensing terms, including information about the scope of the agreements, rights granted, permissible uses, financial information, including fees, payment and royalty structures, and other confidential information.	**Publishers' Objections:** Yellow highlighted portions at ¶¶ 63 and 99-101: Anthropic's policy concerning communications to third-party rightsholders concerning their protected works is a matter of public concern, especially to the rightsholders affected, nor does Anthropic have a privacy interest in

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
		94, 95, 96 & n.125, 97 & n.130; 99, 100, 101	Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers. **Anthropic:** The highlighted portions of the document contain confidential information about a licensing agreement between Anthropic and a non-party, revealing non-public details about the identity of an Anthropic partner who is not party to this litigation and who has a reasonable expectation that Anthropic will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. This text also reveals confidential, non-public information about the terms and conditions of the agreement, including pricing and business strategy. The disclosure of this non-public information is likely to result in competitive harm to Anthropic, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Anthropic. The highlighted portions of the document contain highly confidential non-public information relating to	others' copyrighted works. Disclosure of such information would not cause commercial or privacy harm. Yellow highlighted portion at ¶ 91: The fact that Anthropic has not attempted to negotiate a license with Publishers or other music publishers is not confidential, forms the basis of the instant action, and bears directly on Anthropic's willful infringement of Publishers' lyrics. In addition, Anthropic has publicly asserted that it has not sought out Publishers' lyrics and that it does not prioritize the weight of Publishers' lyrics in its training corpora. *See, e.g.,* ECF No. 209 ¶¶31-32. Yellow highlighted

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's finances, data acquisition strategy, commercialization strategy, and/or product development strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic.	portion at ¶ 94: The fact that Anthropic entered into a license is not commercially sensitive and bears directly on Anthropic's willful infringement of Publishers' lyrics; other AI developers, including Anthropic's direct competitors Google and OpenAI, publicize their content-licensing deals.
605-1	Ex. 02 – Apple License Agreement	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising licensing terms with non-party, information about the scope of the agreements, rights granted, permissible uses, fees, payment structures, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
605-2	Ex. 03 – Apple Term Sheet	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising licensing terms with non-party, information about the scope of the agreements, rights granted, permissible uses, fees, payment structures, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
605-3	Ex. 04 – Spotify License Agreement	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising licensing terms with non-party, information about the scope of the agreements, rights granted, permissible uses, fees, payment structures, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
605-4	Ex. 05 – Google License Agreement	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information comprising licensing terms with non-party, information about the scope of the agreements, rights granted, permissible uses, financial information, including trade secrets, comprising fees, payment structures, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
605-5	Ex. 06 – Amazon License Agreement	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising licensing terms with non-party, information about the scope of the agreements, rights granted, permissible uses, fees, payment structures, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
605-6	Ex. 07 – Amazon License Agreement	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information comprising licensing terms with non-party, information about the scope of the agreements, rights granted, permissible uses, financial information, including trade secrets, comprising fees, payment structures, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
605-7	Ex. 08 – Genius License Agreement	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising licensing terms with non-party, information about the scope of the agreements, rights granted, permissible uses, fees, payment structures, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
605-8	Ex. 09 – Genius License Agreement	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising licensing terms with non-party, information about the scope of the agreements, rights granted, permissible uses, fees, payment structures, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
605-9	Ex. 10 – Lyricfind License Agreement	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising licensing terms with non-party, information about the scope of the agreements, rights granted, permissible uses, fees, payment structures, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
605-10	Ex. 11 – Agreement License Agreement	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information comprising licensing terms with non-party, information about the scope of the agreements, rights granted, permissible uses, financial information, including trade secrets, comprising fees, payment structures, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
605-11	Ex. 12 – Musixmatch License Agreement	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information comprising licensing terms with non-party, information about the scope of the agreements, rights granted, permissible uses, financial information, including trade secrets, comprising fees, payment structures, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			strategies to undercut and unfairly outcompete Publishers.	
605-12	Ex. 13 – Lyricfind License Agreement	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising licensing terms with non-party, information about the scope of the agreements, rights granted, permissible uses, fees, payment structures, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
605-13	Ex. 14 – MusixMatch License Agreement	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information comprising licensing terms with non-party, information about the scope of the agreements, rights granted, permissible uses, financial information, including trade secrets, comprising fees, payment structures, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			strategies to undercut and unfairly outcompete Publishers.	
605-14	Ex. 15 – LyricFind License Agreement	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information comprising licensing terms with non-party, information about the scope of the agreements, rights granted, permissible uses, financial information, including trade secrets, comprising fees, payment structures, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
605-15	Ex. 16 – MusixMatch License Agreement	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising licensing terms with non-party, information about the scope of the agreements, rights granted, permissible uses, fees, payment structures, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			strategies to undercut and unfairly outcompete Publishers.	
605-16	Ex. 17 – License Agreement	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising licensing terms with non-party, information about the scope of the agreements, rights granted, permissible uses, fees, payment structures, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
605-19	Ex. 20 – Google License Agreement	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising licensing terms with non-party, information about the scope of the agreements, rights granted, permissible uses, fees, payment structures, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			strategies to undercut and unfairly outcompete Publishers.	
605-20	Ex. 21 – TikTok License Agreement	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising licensing terms with non-party, information about the scope of the agreements, rights granted, permissible uses, fees, payment structures, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
605-21	Ex. 22 – Apple License Agreement	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising licensing terms with non-party, information about the scope of the agreements, rights granted, permissible uses, fees, payment structures, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			strategies to undercut and unfairly outcompete Publishers.	
605-22	Ex. 23 – Google License Agreement	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising licensing terms with non-party, information about the scope of the agreements, rights granted, permissible uses, fees, payment structures, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
605-23	Ex. 24 – Google License Agreement	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information comprising licensing terms with non-party, information about the scope of the agreements, rights granted, permissible uses, financial information, including trade secrets, comprising fees, payment structures, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			strategies to undercut and unfairly outcompete Publishers.	
605-24	Ex. 25 – Snap License Agreement	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising licensing terms with non-party, information about the scope of the agreements, rights granted, permissible uses, fees, payment structures, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
605-25	Ex. 26 – Google License Agreement	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising licensing terms with non-party, information about the scope of the agreements, rights granted, permissible uses, fees, payment structures, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			strategies to undercut and unfairly outcompete Publishers.	
605-26	Ex. 27 – Google License Agreement	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising licensing terms with non-party, information about the scope of the agreements, rights granted, permissible uses, fees, payment structures, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
605-27	Ex. 28 – Pandora Media, LLC License Agreement	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising licensing terms with non-party, information about the scope of the agreements, rights granted, permissible uses, fees, payment structures, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			strategies to undercut and unfairly outcompete Publishers.	
605-28	Ex. 29 – Snap Inc. License Agreement	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising licensing terms with non-party, information about the scope of the agreements, rights granted, permissible uses, fees, payment structures, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
605-29	Ex. 30 – Anthropic_000022915 2	**Anthropic:** Entire document.	**Anthropic:** The document contains highly confidential non-public information relating to Anthropic's internal business operations and strategy, including specific information regarding Anthropic's data acquisition and partnership strategy and product development strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic.	
605-30	Ex. 31 – License Agreement	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			trade secrets, comprising licensing terms with non-party, information about the scope of the agreements, rights granted, permissible uses, fees, payment structures, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
605-31	Ex. 32 – Anthropic_000021847 9	**Anthropic:** Yellow Highlighted Portions pp. 1-3, 5	**Anthropic**: The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's data acquisition strategy, commercialization strategy, and product development strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic.	
605-32	Ex. 33 – Anthropic_000022808 0	**Anthropic:** Yellow highlighted portions at pp. 3-4, 7	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about sources of	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			training dataset mixes and Anthropic's analysis of the value of that data, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
605-33	Ex. 34 – Anthropic_0000441006	**Anthropic:** Entire Document	**Anthropic:** The document contains highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about sources of training dataset mixes and cost of that data, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
605-34	Ex. 35 – Anthropic_0000217184	**Anthropic:** Entire document.	**Anthropic:** The document contains highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's finances, data acquisition strategy, commercialization strategy, and product development strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic. The document contains highly confidential non-public information relating to Anthropic's views of its competitors in various product markets. Disclosure of this non-public information is likely to result in competitive harm to Anthropic, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Anthropic. The document contains highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about sources of training dataset mixes and methods to obtain that data, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
605-35	Ex. 36 – Anthropic_00005826 34	**Anthropic:** Entire document	**Anthropic:** The document contains highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			Anthropic's product development strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic.	
605-36	Ex. 37 – Anthropic_000042949 6	**Anthropic:** Entire document	**Anthropic:** The document contains confidential information about a licensing agreement between Anthropic and a non-party, revealing non-public details about the identity of an Anthropic partner who is not party to this litigation and who has a reasonable expectation that Anthropic will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. This text also reveals confidential, non-public information about the terms and conditions of the agreement, including pricing. The disclosure of this non-public information is likely to result in competitive harm to Anthropic, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Anthropic.	
605-37	Ex. 38 – Anthropic_000023122 6	**Anthropic:** Entire document	**Anthropic:** The document contains highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about sources of	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			training dataset mixes, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
605-38	Ex. 39 – Anthropic_000021599 2	**Anthropic:** Yellow highlighted portions at p. 2	**Anthropic:** The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's data acquisition strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic.	
605-39	Ex. 40 – Anthropic_000047924 1	**Anthropic:** Entire document	**Anthropic**: The document contains highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's data acquisition strategy, commercialization strategy, and product development strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			augment their business operations in an effort to compete unfairly against Anthropic. The document contains highly confidential non-public information relating to Anthropic's views of its competitors in various product markets. Disclosure of this non-public information is likely to result in competitive harm to Anthropic, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Anthropic. The document contains highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about sources of training dataset mixes and methods to obtain that data, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
605-41	Ex. 42 – Anthropic_000044320 4	**Anthropic:** Entire document	**Anthropic**: The document contains highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's product development strategy, public disclosure of	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic. The document contains highly confidential non-public information relating to Anthropic's views of its competitors in various product markets. Disclosure of this non-public information is likely to result in competitive harm to Anthropic, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Anthropic.	
Declaration of Joshua Dennis in Support of Plaintiffs' Motion for Partial Summary Judgment (ECF No. 608 *et seq.*)				
608	Declaration of Joshua Dennis in Support of Plaintiffs' Motion for Partial Summary Judgment	**Anthropic:** Yellow highlighted portions at p. 5, 13, 14, 16	**Anthropic:** The highlighted portions of the document contain confidential non-public information relating to Anthropic's business practices and operations, including specific and sensitive metrics related to Claude usage, public disclosure of which would cause competitive harm to Anthropic, and the contents of specific prompts and outputs, public disclosure of which would unduly intrude on the privacy of third-party Claude users.	
Declaration of Shawn Shan in Support of Plaintiffs' Motion for Partial Summary Judgment (ECF No. 609 *et seq.*)				
609	Declaration of Shawn	**Anthropic:** Yellow	**Anthropic:** The highlighted portions of the document contain	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
	Shan in Support of Plaintiffs' Motion for Partial Summary Judgment	highlighted portions at ¶¶ 25, 33, 36-37, 41, 44	highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about Anthropic's training data such as the names of training data files, the number of times particular pieces of data appear within the training data, the number of times and date range of data Anthropic acquired for use in training, the weight Anthropic assigns to particular data for training, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
609-2	Ex. C – Anthropic_000001606 6	**Anthropic:** Entire document	**Anthropic:** The document contains highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about training dataset mixes and their specific file names, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
609-3	Ex. D – Anthropic_000035270 1	**Anthropic:** Entire document	**Anthropic**: The document contains highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			sensitive details about sources of training dataset mixes and token counts, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
609-4	Ex. E – Anthropic_000024083 1	**Anthropic:** Yellow highlighted portions throughout	**Anthropic**: The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's product development strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic. The highlighted portions contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about sources of training dataset mixes and token counts, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			training their generative AI models. The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal technical operations, including specific and sensitive details about the internal data storage locations on Anthropic's servers and the datasets stored at those locations, public disclosure of which would harm Anthropic's ability to maintain proper security over its data by providing bad actors with the information needed to attempt to access those locations.	
609-5	Ex. F – Anthropic_00003427932	**Anthropic:** Entire document	**Anthropic**: The document contains highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about sources of training dataset mixes and token counts, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The document contains highly confidential non-public information relating to Anthropic's internal technical operations, including specific and sensitive details about the internal data storage locations on Anthropic's servers and the datasets stored at those locations,	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			public disclosure of which would harm Anthropic's ability to maintain proper security over its data by providing bad actors with the information needed to attempt to access those locations.	
Declaration of Ben Zhao in Support of Plaintiffs' Motion for Partial Summary Judgment (ECF No. 606 *et seq.*)				
606	Declaration of Ben Zhao in Support of Plaintiffs' Motion for Partial Summary Judgment	**Anthropic:** Yellow highlighted portions at ¶¶ 15, 21, 23 & n.23, 29, 42, 45, 52, n.71, 62, n.75, 70, 71-73, 75-77, 79, 80, 82-86, 88- 89	**Anthropic**: The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about sources and size of training dataset mixes and methods to obtain that data, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the operation, training methods, and development of Claude. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models, harming Anthropic.	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information, including the amount of content included within its guardrails, would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's product development strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			compete unfairly against Anthropic.	
606-1	Ex. B – Anthropic_000021847 9	**Anthropic:** Yellow highlighted portions at pp. 1-3, 5	**Anthropic**: The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's data acquisition strategy, commercialization strategy, and product development strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic.	
606-2	Ex. D – Sangani 128 (Anthropic_000034608 3)	**Anthropic:** Yellow highlighted portions at pp. 2-4	**Anthropic:** The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's data acquisition strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic. The highlighted portions of the document contain highly confidential nonpublic information relating to	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			Anthropic's internal technical operations, including specific and sensitive details about sources of training dataset mixes and methods to obtain that data, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
606-4	Ex. F – Anthropic's Amended and Supplemental Responses and Objections to Plaintiffs' First Set of Interrogatories (Nos. 9, 11, 12)	**Anthropic:** Highlighted portions at pp. 12-14	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information, including the amount of content included within the guardrails, the dates Anthropic implemented or adjusted guardrails, and specific technical thresholds used in the guardrails, would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
606-5	Ex. G. – Drain 140	**Anthropic**: Yellow highlighted portions throughout	**Anthropic:** The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's commercialization strategy and product development strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic. The highlighted portions of the document also contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the operation, training methods, and development of Claude. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models, harming Anthropic.	
606-6	Ex. H – Anthropic_00004584 27	**Anthropic:** Entire document	**Anthropic:** This document contains highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's commercialization strategy and product development strategy,	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic. The document contains highly confidential non-public information relating to Anthropic's views of its competitors in various product markets. Disclosure of this non-public information is likely to result in competitive harm to Anthropic, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Anthropic.	
606-7	Ex. I – Anthropic_00005005999	**Anthropic:** Yellow highlighted portions throughout	**Anthropic:** The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's commercialization strategy and product development strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic.	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			The highlighted portions of the document also contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the operation, training methods, and development of Claude. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models, harming Anthropic.	
606-9	Ex. K – Amodei 172	**Anthropic:** Entire document	**Anthropic**: The document contains highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's commercialization strategy, and product development strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic.	
606-10	Ex. L – Anthropic_ 000047827 1	**Anthropic:** Yellow highlighted portions at pp. 3, 5-6, 9-10, 12, 19-21, 24-26, 33-34, 38, 41-43, 49, 55-56, 58-60, 64, 67-76, 79, 81	**Anthropic**: The highlighted portions of the document contain confidential information about a commercial agreement between Anthropic and a non-party, revealing non-public details about the identity of an Anthropic partner who is not party to this litigation and who has a reasonable expectation that Anthropic will maintain the	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			confidentiality of contractual terms and its own confidential statements made during negotiations. The disclosure of this non-public information is likely to result in competitive harm to Anthropic, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Anthropic. The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's data acquisition strategy, commercialization strategy, and product development strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic. The highlighted portion of the document contains highly confidential non-public information relating to Anthropic's internal technical operations, including specific and sensitive details about the internal data storage locations on Anthropic's servers and the datasets stored at those locations,	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			public disclosure of which would harm Anthropic's ability to maintain proper security over its data by providing bad actors with the information needed to attempt to access those locations. The highlighted portions of the document contain confidential non-public information relating to Anthropic's business practices and operations, including specific and sensitive metrics related to Claude usage, public disclosure of which would cause competitive harm to Anthropic.	
606-11	Ex. M – Anthropic_0000525947	**Anthropic:** Yellow highlighted portions at p. 7	**Anthropic:** The highlighted portion of the document contains highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about internal model identifiers and software architecture Anthropic uses to develop, train, and evaluate its models, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
606-12	Ex. N – Anthropic_0000459162	**Anthropic:** Yellow highlighted portions at pp. 3-7, 13-14	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about source code, internal tooling, and software architecture Anthropic	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			uses to develop, train, and evaluate its models, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal technical operations, including specific and sensitive details about the internal data storage locations on Anthropic's servers and the datasets stored at those locations, public disclosure of which would harm Anthropic's ability to maintain proper security over its data by providing bad actors with the information needed to attempt to access those locations.	
606-13	Ex. O – Anthropic_000055436 6	**Anthropic:** Yellow highlighted portions at pp. 17, 19, 21-23	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about source code, internal tooling, and software architecture Anthropic uses to develop, train, and evaluate its models, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal technical operations, including specific and sensitive details about the internal data storage locations on Anthropic's servers and the datasets stored at those locations, public disclosure of which would harm Anthropic's ability to maintain proper security over its data by providing bad actors with the information needed to attempt to access those locations.	
606-15	Ex. Q – Anthropic_000055498 0	**Anthropic:** Yellow highlighted portions at pp. 1-13	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about internal model identifiers and software architecture Anthropic uses to develop, train, and evaluate its models, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
606-16	Ex. R – Anthropic_000052790 3	**Anthropic:** Yellow highlighted portions at pp.	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
		3, 10-11, 13, 18, 23-26	operations, including specific and sensitive details about the source code, internal tooling, internal model identifiers, and software architecture Anthropic uses to develop, train, and evaluate its models, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
606-17	Ex. S – Anthropic_000055476 9	**Anthropic:** Yellow highlighted portions at pp. 2-8, 9-45, 47-70, 72-74, 77-84, 86-90	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the source code, internal tooling, internal model identifiers, and software architecture Anthropic uses to develop, train, and evaluate its models, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal technical operations, including specific and sensitive details about the internal	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			data storage locations on Anthropic's servers and the datasets stored at those locations, public disclosure of which would harm Anthropic's ability to maintain proper security over its data by providing bad actors with the information needed to attempt to access those locations.	
606-20	Ex. V – Anthropic_000045849 1	**Anthropic:** Entire Document	**Anthropic:** The document contains highly confidential non-public information relating to Anthropic's views of its competitors and technical testing related to the same. Disclosure of this non-public information is likely to result in competitive harm to Anthropic, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Anthropic. **Anthropic:** The document also contains highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the training methods and development of Claude. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models, harming Anthropic.	
606-21	Ex. W – Anthropic_000034406 4	**Anthropic:** Yellow highlighted portions at pp. 2 and 4	**Anthropic**: The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and	

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			sensitive details about sources of training dataset mixes public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
606-39	Ex. OO – Anthropic_0000477560	**Anthropic:** Entire document	**Anthropic:** The document contains highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the operation and development of Claude, including its content guardrails and defense systems. The release of this information, including details about guardrail features and how guardrails are deployed across various products, would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models, harming Anthropic. The document contains highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			Anthropic's allocation of resources within its Trust & Safety department and hiring objectives for specific roles, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic.	
606-40	Ex. PP – Anthropic_0000217166	**Anthropic:** Entire document	**Anthropic:** The document contains highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the operation, training methods, and development of Claude, specifically details about Anthropic's deployment testing, deployment metrics, and safety objectives. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models, harming Anthropic. The document contains highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's product deployment strategy and development of product features for particular clients, public disclosure of which would cause competitive harm to	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic.	
606-41	Ex. QQ – Anthropic_ 0000477437	**Anthropic:** Entire document	**Anthropic:** The document contains highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's product development strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic. The document contains highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the operation, training, and development of Claude's content guardrails. The release of this information would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			training their generative AI models.	
606-42	Ex. RR – Kaplan 238	**Anthropic:** Entire document	**Anthropic:** The document contains highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the operation, training methods, and development of Claude, specifically details about Anthropic's deployment testing, deployment metrics, and safety objectives. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models, harming Anthropic. The document contains highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's product deployment strategy and development of product features for particular clients, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic.	
606-43	Ex. SS – Kaplan 240	**Anthropic:** Yellow highlighted	**Anthropic:** The highlighted portions of the document contain highly confidential non-public	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
		portions at pp. 2-3	information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's product development strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic. The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal technical operations, including specific and sensitive details about internal data storage locations on Anthropic's servers, public disclosure of which would harm Anthropic's ability to maintain proper security over its data by providing bad actors with the information needed to attempt to access those locations	
606-44	Ex. TT – Anthropic_000024066 5	**Anthropic:** Yellow highlighted portions at pp. 2-3	**Anthropic:** The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's product development strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			data to modify or augment their business operations in an effort to compete unfairly against Anthropic. The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal technical operations, including specific and sensitive details about internal data storage locations on Anthropic's servers, public disclosure of which would harm Anthropic's ability to maintain proper security over its data by providing bad actors with the information needed to attempt to access those locations	
606-47	Ex. XX – Anthropic_000022701 6	**Anthropic:** Entire document	**Anthropic:** The document contains highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information, including step-by-step instructions for how a particular guardrail was developed, the data used to develop the guardrail, plans for future improvements, and evaluation metrics, would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			and business strategies employed by Anthropic's competitors in training their generative AI models.	
606-48	Ex. YY – Anthropic_000001090 6	**Anthropic:** Entire Document	**Anthropic**: The document contains highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's product launch strategy public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic.	
606-49	Ex. ZZ – Anthropic_000001243 7	**Anthropic:** Entire Document	**Anthropic**: The document contains highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's product launch strategy public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic.	
606-50	Ex. AAA – Anthropic_000034781 0	**Anthropic:** Entire Document	**Anthropic:** The document contains highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the technological guardrails that	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			Anthropic designed to inhibit the replication of copyrighted content. The release of this information, including the amount of content included within its guardrails, would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
606-51	Ex. BBB. 2025.12.11 Anthropic's Am. Supp. Resp. to ROG No. 12	**Anthropic:** Yellow highlighted portion at pg. 6	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information, including the amount of content included within the guardrails and the dates Anthropic implemented or adjusted guardrails, would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			training their generative AI models.	
606-52	Ex. CCC – Anthropic_000024217 3	**Anthropic:** Entire document	**Anthropic:** The document contains highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the development of technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
Declaration of David Kokakis in Support of Plaintiffs' Motion for Partial Summary Judgment (ECF No. 620 *et seq.*)				
620	Declaration of David Kokakis in Support of Plaintiffs' Motion for Partial Summary Judgment	**Publishers:** Blue highlighted portions at ¶¶ 153, 155–56, 159–60, 162–66.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive licensing terms, including information about the scope of the agreements, rights granted, permissible uses, various rights and obligations, licensing frameworks, and confidential discussions with license counterparties and potential counterparties. Public disclosure of this commercially sensitive information would cause harm to Publishers, including but not	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
623-12	Ex. A – Genius License Agreement	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising licensing terms with non-party, information about the scope of the agreements, rights granted, permissible uses, fees, payment structures, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
623-13	Ex. B – Musixmatch License Agreement	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising licensing terms with non-party, information about the scope of the agreements, rights granted, permissible uses, fees, payment structures, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
623-3	Ex. UMPG–16B – Ownership Documents	**Publishers:** Documents bearing Bates numbers UMPG_-7456 through UMPG_-7479.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive assignment and assumption agreement terms, including information about the scope of the agreements, rights granted, permissible uses, and various rights and obligations, and other confidential information. Public disclosure of this commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
623-4	Ex. UMPG–17B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information comprising agreement terms negotiated with non-party, rights granted and retained, term length, territories affected, relevant works, financial information, including trade secrets, comprising payments, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
623-6	Ex. UMPG–19B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising agreement terms negotiated with non-party, rights granted and retained, term length, territories affected, relevant works, payments, payment and royalty structures, and confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
623-9	Ex. UMPG–22B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information comprising purchase agreement terms, information about the scope of the agreements, assets acquired, rights acquired, financial information, including trade secrets, comprising purchase price and fees, payment structure, rights and obligations, corporate structures, liabilities, and other confidential information. Public disclosure of these trade	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
622-1	Ex. UMPG–25B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising purchase agreement terms, information about the scope of the agreements, assets acquired, rights acquired, purchase price and fees, rights and obligations, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
622-5	Ex. UMPG–30B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information comprising agreement terms negotiated with non-party, rights granted and retained, term length, territories affected, relevant works, financial information, including trade secrets, comprising payments, and other confidential information.	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
622-6	Ex. UMPG–34B – Ownership Documents	**Publishers:** Documents bearing Bates numbers UMPG_-22839 through UMPG_-22859.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising agreement terms negotiated with non-party, rights granted and retained, term length, territories affected, relevant works, payments, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
622-8	Ex. UMPG–36B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising purchase agreement terms, information about the scope of the agreements, assets acquired, rights acquired, purchase price and fees, rights and obligations, and other confidential information.	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
622-11	Ex. UMPG–40B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising purchase agreement terms, information about the scope of the agreements, assets acquired, rights acquired, purchase price and fees, rights and obligations, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
622-12	Ex. UMPG–41B – Ownership Documents	**Publishers:** Documents bearing Bates numbers UMPG_-5710 through UMPG_-5895.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information comprising purchase agreement terms, information about the scope of the agreements, assets acquired, rights acquired, financial information, including trade secrets, comprising purchase price and fees, rights and obligations, and other confidential	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
622-13	Ex. UMPG–42B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information comprising agreement terms negotiated with non-party, rights granted and retained, term length, territories affected, relevant works, financial information, including trade secrets, comprising payments, payment and royalty structures, and confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
622-14	Ex. UMPG–43B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information comprising agreement terms negotiated with non-party, rights granted and retained, term length, territories affected, relevant works, financial information, including trade secrets, comprising payments,	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			payment and royalty structures, and confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
622-15	Ex. UMPG–44B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising purchase agreement terms, information about the scope of the agreements, assets acquired, rights acquired, purchase price and fees, rights and obligations, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
622-16	Ex. UMPG–45B – Ownership Documents	**Publishers:** Documents bearing Bates numbers: UMPG_-15208 through -15216; UMPG_-8855 through -8866.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising purchase agreement terms, information about the scope of the agreements, assets acquired, rights acquired, purchase price	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			and fees, rights and obligations, and other confidential information. Discloses highly confidential, non-public, and commercially sensitive terms, including rights granted and retained, term length, territories affected, relevant works, payments, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
622-17	Ex. UMPG–46B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising agreement terms negotiated with non-party, rights granted and retained, term length, territories affected, relevant works, payments, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
622-18	Ex. UMPG–47B – Ownership Documents	**Publishers:** Documents bearing Bates numbers: UMPG _-7284 to UMPG_-7415.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information comprising purchase agreement terms, information about the scope of the agreements, assets acquired, rights acquired, financial information, including trade secrets, comprising purchase price and fees, rights and obligations, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
622-19	Ex. UMPG–48B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising agreement terms negotiated with non-party, rights granted and retained, term length, territories affected, relevant works, payments, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			strategies to undercut and unfairly outcompete Publishers.	
622-20	Ex. UMPG–49B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising agreement terms negotiated with non-party, rights granted and retained, term length, territories affected, relevant works, payments, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
621-1	Ex. UMPG–50B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information comprising purchase agreement terms, information about the scope of the agreements, assets acquired, rights acquired, financial information, including trade secrets, comprising purchase price and fees, rights and obligations, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to	

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			gain insight into business strategies to undercut and unfairly outcompete Publishers.	
621-2	Ex. UMPG–51B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising agreement terms negotiated with non-party, rights granted and retained, term length, territories affected, relevant works, payments, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
621-3	Ex. UMPG–52B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information comprising purchase agreement terms, information about the scope of the agreements, assets acquired, rights acquired, financial information, including trade secrets, comprising purchase price and fees, rights and obligations, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the	

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			unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
621-4	Ex. UMPG–53B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising agreement terms negotiated with non-party, rights granted and retained, term length, territories affected, relevant works, payments, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
621-5	Ex. UMPG–54B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising purchase agreement terms, information about the scope of the agreements, assets acquired, rights acquired, purchase price and fees, rights and obligations, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the	

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			unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
621-6	Ex. UMPG–55B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising purchase agreement terms, information about the scope of the agreements, assets acquired, rights acquired, purchase price and fees, rights and obligations, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
621-7	Ex. UMPG–56B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising agreement terms negotiated with non-party, rights granted and retained, term length, territories affected, relevant works, payments, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the	

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			unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
621-8	Ex. UMPG–57B – Ownership Documents	**Publishers:** Documents bearing Bates numbers UMPG_-7065 through -7084; UMPG_ -17793 through UMPG_-17836.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising purchase agreement terms, information about the scope of the agreements, assets acquired, rights acquired, purchase price and fees, rights and obligations, and other confidential information. Discloses highly confidential, non-public, and commercially sensitive terms, including rights granted and retained, term length, territories affected, relevant works, payments, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
621-9	Ex. UMPG–58B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising agreement terms negotiated with non-party, rights granted and retained, term length, territories affected, relevant works, payments, and other confidential	

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			information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
621-10	Ex. UMPG–59B – Ownership Documents	**Publishers:** Documents bearing Bates numbers: UMPG_-13433 through UMPG_-13454.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising agreement terms negotiated with non-party, rights granted and retained, term length, territories affected, relevant works, payments, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
621-12	Ex. UMPG–61B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising agreement terms negotiated with non-party, rights granted and retained, term length, territories affected, relevant works, payments, and other confidential information.	

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			Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
621-13	Ex. UMPG–62B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising agreement terms negotiated with non-party, rights granted and retained, term length, territories affected, relevant works, payments, payment and royalty structures, and confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
621-14	Ex. UMPG–63B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising purchase agreement terms, information about the scope of the agreements, assets acquired, rights acquired, purchase price and fees, rights and obligations, and other confidential	

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			information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
621-15	Ex. UMPG–64B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising purchase agreement terms, information about the scope of the agreements, assets acquired, rights acquired, purchase price and fees, rights and obligations, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
621-16	Ex. UMPG–65B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information comprising purchase agreement terms, information about the scope of the agreements, assets acquired, rights acquired, financial information, including trade secrets, comprising purchase	

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			price and fees, rights and obligations, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
621-17	Ex. UMPG–66B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising purchase agreement terms, information about the scope of the agreements, assets acquired, rights acquired, purchase price and fees, rights and obligations, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
621-18	Ex. UMPG–67B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising purchase agreement terms, information about the scope of the agreements, assets acquired,	

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			rights acquired, purchase price and fees, rights and obligations, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
621-19	Ex. UMPG–68B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information comprising agreement terms negotiated with non-party, rights granted and retained, term length, territories affected, relevant works, financial information, including trade secrets, comprising payments, payment and royalty structures, and confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
621-20	Ex. UMPG–69B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information comprising agreement terms negotiated with non-party, rights granted and retained, term length, territories	

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			affected, relevant works, financial information, including trade secrets, comprising payments, payment and royalty structures, and confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
621-21	Ex. UMPG–70B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising purchase agreement terms, information about the scope of the agreements, assets acquired, rights acquired, purchase price and fees, rights and obligations, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
620-63	Ex. UMPG–73B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information comprising agreement terms negotiated with non-party, rights granted and	

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			retained, term length, territories affected, relevant works, financial information, including trade secrets, comprising payments, payment and royalty structures, and confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
620-62	Ex. UMPG–74B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information comprising purchase agreement terms, information about the scope of the agreements, assets acquired, rights acquired, financial information, including trade secrets, comprising purchase price and fees, rights and obligations, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
620-61	Ex. UMPG–75B –	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including	

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	Ownership Documents		trade secrets, comprising purchase agreement terms, information about the scope of the agreements, assets acquired, rights acquired, purchase price and fees, rights and obligations, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
620-60	Ex. UMPG–76B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses confidential and non-public assignment terms, including information about the scope of the agreements, assets acquired, rights acquired, rights and obligations, and other confidential information. Public disclosure of this commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
620-59	Ex. UMPG–77B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising agreement terms negotiated with non-party, rights granted and	

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			retained, term length, territories affected, relevant works, payments, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
620-58	Ex. UMPG–78B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information comprising agreement terms negotiated with non-party, rights granted and retained, term length, territories affected, relevant works, financial information, including trade secrets, comprising payments, payment and royalty structures, and confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
620-57	Ex. UMPG–79B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information comprising purchase agreement terms, information about the scope of the agreements, assets acquired,	

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			rights acquired, financial information, including trade secrets, comprising purchase price and fees, rights and obligations, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
620-56	Ex. UMPG–80B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising purchase agreement terms, information about the scope of the agreements, assets acquired, rights acquired, purchase price and fees, rights and obligations, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
620-55	Ex. UMPG–81B – Ownership Documents	**Publishers:** Documents bearing Bates numbers UMPG_-5218	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising	

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		through UMPG_-5262.	purchase agreement terms, information about the scope of the agreements, assets acquired, rights acquired, purchase price and fees, rights and obligations, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
620-54	Ex. UMPG–82B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising purchase agreement terms, information about the scope of the agreements, assets acquired, rights acquired, purchase price and fees, rights and obligations, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
620-53	Ex. UMPG–83B –	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including	

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	Ownership Documents		trade secrets, comprising agreement terms negotiated with non-party, rights granted and retained, term length, territories affected, relevant works, payments, payment and royalty structures, and confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
620-52	Ex. UMPG–84B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information comprising purchase agreement terms, information about the scope of the agreements, assets acquired, rights acquired, financial information, including trade secrets, comprising purchase price and fees, rights and obligations, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
620-51	Ex. UMPG–	**Publishers:**	**Publishers:** Discloses highly confidential,	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
	85B – Ownership Documents	Entire document.	non-public, and commercially sensitive information, including trade secrets, comprising agreement terms negotiated with non-party, rights granted and retained, term length, territories affected, relevant works, payments, payment and royalty structures, and confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
620-50	Ex. UMPG–86B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information comprising purchase agreement terms, information about the scope of the agreements, assets acquired, rights acquired, financial information, including trade secrets, comprising purchase price and fees, rights and obligations, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	

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620-49	Ex. UMPG–87B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising agreement terms negotiated with non-party, rights granted and retained, term length, territories affected, relevant works, payments, payment and royalty structures, and confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
620-48	Ex. UMPG–88B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising purchase agreement terms, information about the scope of the agreements, assets acquired, rights acquired, purchase price and fees, rights and obligations, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business	

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			strategies to undercut and unfairly outcompete Publishers.	
620-47	Ex. UMPG–89B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information comprising agreement terms negotiated with non-party, rights granted and retained, term length, territories affected, relevant works, financial information, including trade secrets, comprising payments, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
620-46	Ex. UMPG–90B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising purchase agreement terms, information about the scope of the agreements, assets acquired, rights acquired, purchase price and fees, rights and obligations, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to	

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			gain insight into business strategies to undercut and unfairly outcompete Publishers.	
620-45	Ex. UMPG–91B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising purchase agreement terms, information about the scope of the agreements, assets acquired, rights acquired, purchase price and fees, rights and obligations, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
620-44	Ex. UMPG–92B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising purchase agreement terms, information about the scope of the agreements, assets acquired, rights acquired, purchase price and fees, rights and obligations, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the	

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			unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
620-43	Ex. UMPG–93B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information comprising purchase agreement terms, information about the scope of the agreements, assets acquired, rights acquired, financial information, including trade secrets, comprising purchase price and fees, rights and obligations, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
620-42	Ex. UMPG–94B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising purchase agreement terms, information about the scope of the agreements, assets acquired, rights acquired, purchase price and fees, rights and obligations, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but	

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			not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
620-41	Ex. UMPG–95B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising agreement terms negotiated with non-party, rights granted and retained, term length, territories affected, relevant works, payments, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
620-40	Ex. UMPG–96B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising purchase agreement terms, information about the scope of the agreements, assets acquired, rights acquired, purchase price and fees, rights and obligations, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but	

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			not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
620-39	Ex. UMPG–97B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising purchase agreement terms, information about the scope of the agreements, assets acquired, rights acquired, purchase price and fees, rights and obligations, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
620-38	Ex. UMPG–98B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising purchase agreement terms, information about the scope of the agreements, assets acquired, rights acquired, purchase price and fees, rights and obligations, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause	

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			harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
620-37	Ex. UMPG–99B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising purchase agreement terms, information about the scope of the agreements, assets acquired, rights acquired, purchase price and fees, rights and obligations, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
620-36	Ex. UMPG–100B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising purchase agreement terms, information about the scope of the agreements, assets acquired, rights acquired, purchase price and fees, rights and obligations, and other confidential information. Public disclosure of these trade secrets and other commercially	

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			sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
620-35	Ex. UMPG–101B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising agreement terms negotiated with non-party, rights granted and retained, term length, territories affected, relevant works, payments, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
620-34	Ex. UMPG–102B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising purchase agreement terms, information about the scope of the agreements, assets acquired, rights acquired, purchase price and fees, rights and obligations, and other confidential information. Public disclosure of these trade secrets and other commercially	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
620-33	Ex. UMPG–103B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information comprising agreement terms negotiated with non-party, rights granted and retained, term length, territories affected, relevant works, financial information, including trade secrets, comprising payments, payment and royalty structures, and confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
620-31	Ex. UMPG–105B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising purchase agreement terms, information about the scope of the agreements, assets acquired, rights acquired, purchase price and fees, rights and obligations, and other confidential information. Public disclosure of these trade	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
620-29	Ex. UMPG–107B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising agreement terms negotiated with non-party, rights granted and retained, term length, territories affected, relevant works, payments, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
620-28	Ex. UMPG–108B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising purchase agreement terms, information about the scope of the agreements, assets acquired, rights acquired, purchase price and fees, rights and obligations, and other confidential information. Public disclosure of these trade	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
620-27	Ex. UMPG–109B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising purchase agreement terms, information about the scope of the agreements, assets acquired, rights acquired, purchase price and fees, rights and obligations, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
620-26	Ex. UMPG–110B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising agreement terms negotiated with non-party, rights granted and retained, term length, territories affected, relevant works, payments, and other confidential information. Public disclosure of these trade	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
620-25	Ex. UMPG–111B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising purchase agreement terms, information about the scope of the agreements, assets acquired, rights acquired, purchase price and fees, rights and obligations, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
620-24	Ex. UMPG–112B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising agreement terms negotiated with non-party, rights granted and retained, term length, territories affected, relevant works, payments, payment and royalty structures, and confidential information.	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
620-23	Ex. UMPG–113B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising purchase agreement terms, information about the scope of the agreements, assets acquired, rights acquired, purchase price and fees, rights and obligations, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
620-22	Ex. UMPG–114B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising purchase agreement terms, information about the scope of the agreements, assets acquired, rights acquired, purchase price and fees, rights and obligations, and other confidential information.	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
620-19	Ex. UMPG–118B – Ownership Documents	**Publishers:** Documents bearing Bates numbers UMPG_-4493 through UMPG_-4550; UMPG_-20476 through UMPG_-20583; UMPG_-22818 through UMPG_-22838.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information comprising share purchase agreement terms, information about the scope of the agreements, assets acquired, rights acquired, financial information, including trade secrets, comprising payment and royalty structure, rights and obligations, and other confidential information; Discloses highly confidential, non-public, and commercially sensitive terms, including rights granted and retained, term length, territories affected, relevant works, payments, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
620-18	Ex. UMPG–	**Publishers:**	**Publishers:** Discloses highly confidential,	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
	119B – Ownership Documents	Entire document.	non-public, and commercially sensitive information comprising purchase agreement terms, information about the scope of the agreements, assets acquired, rights acquired, financial information, including trade secrets, comprising purchase price and fees, rights and obligations, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
620-17	Ex. UMPG–120B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising agreement terms negotiated with non-party, rights granted and retained, term length, territories affected, relevant works, payments, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
620-16	Ex. UMPG–121B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information comprising agreement terms negotiated with non-party, rights granted and retained, term length, territories affected, relevant works, financial information, including trade secrets, comprising payments, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
620-15	Ex. UMPG–122B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising purchase agreement terms, information about the scope of the agreements, assets acquired, rights acquired, purchase price and fees, rights and obligations, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			strategies to undercut and unfairly outcompete Publishers.	
620-14	Ex. UMPG–123B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising agreement terms negotiated with non-party, rights granted and retained, term length, territories affected, relevant works, payments, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
620-13	Ex. UMPG–124B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising agreement terms negotiated with non-party, rights granted and retained, term length, territories affected, relevant works, payments, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			strategies to undercut and unfairly outcompete Publishers.	
620-12	Ex. UMPG–125B – Ownership Documents	**Publishers:** Documents bearing Bates numbers UMPG_-16528 through UMPG_-16538; UMPG_-16507 through UMPG_-16510; UMPG_-16489 through UMPG_-16506; UMPG_–6131 through UMPG_-6756.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising purchase agreement terms, information about the scope of the agreements, assets acquired, rights acquired, purchase price and fees, rights and obligations, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
620-11	Ex. UMPG–127B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information comprising purchase agreement terms, information about the scope of the agreements, assets acquired, rights acquired, financial information, including trade secrets, comprising purchase price and fees, rights and obligations, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the	

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			unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
620-10	Ex. UMPG–128B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising agreement terms negotiated with non-party, rights granted and retained, term length, territories affected, relevant works, payments, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
620-9	Ex. UMPG–129B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising purchase agreement terms, information about the scope of the agreements, assets acquired, rights acquired, purchase price and fees, rights and obligations, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
620-8	Ex. UMPG–130B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information comprising purchase agreement terms, information about the scope of the agreements, assets acquired, rights acquired, financial information, including trade secrets, comprising purchase price and fees, rights and obligations, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
620-7	Ex. UMPG–131B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising agreement terms negotiated with non-party, rights granted and retained, term length, territories affected, relevant works, payments, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
620-6	Ex. UMPG–132B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising purchase agreement terms, information about the scope of the agreements, assets acquired, rights acquired, purchase price and fees, rights and obligations, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
620-5	Ex. UMPG–133B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information comprising agreement terms negotiated with non-party, rights granted and retained, term length, territories affected, relevant works, financial information, including trade secrets, comprising payments, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
620-4	Ex. UMPG–134B – Ownership Documents	**Publishers:** Documents bearing Bates numbers UMPG_-4632 through UMPG_-4661; UMPG_-4356 through UMPG_-4361.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information comprising agreement terms negotiated with non-party, rights granted and retained, term length, territories affected, relevant works, financial information, including trade secrets, comprising payments, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
620-3	Ex. UMPG–135B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information comprising purchase agreement terms, information about the scope of the agreements, assets acquired, rights acquired, financial information, including trade secrets, comprising purchase price and fees, rights and obligations, and other confidential information. Public disclosure of these trade secrets and other commercially	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
620-2	Ex. UMPG–136B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information comprising purchase agreement terms, information about the scope of the agreements, assets acquired, rights acquired, financial information, including trade secrets, comprising purchase price and fees, rights and obligations, and other confidential information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
620-1	Ex. UMPG–137B – Ownership Documents	**Publishers:** Entire document.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information, including trade secrets, comprising agreement terms negotiated with non-party, rights granted and retained, term length, territories affected, relevant works, payments, and other confidential information. Discloses highly confidential,	

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			non-public, and commercially sensitive information, including trade secrets, comprising purchase agreement terms, information about the scope of the agreements, assets acquired, rights acquired, purchase price and fees, rights and obligations, and other confidential information. Discloses highly confidential, non-public details about corporate structures and operating agreement information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
Publishers' Motion in Limine to Partially Exclude the Opinions of Dr. Russ Altman (ECF No. 654 *et seq.*)				
654-6	Ex. F – Excerpts of the 30(b)(1) Deposition of Ben Mann	**Anthropic:** Yellow highlighted portions at 113:30-114:3	**Anthropic**: The highlighted portion of the document contains highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about Anthropic's approach to training dataset mixes, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			Anthropic's competitors in training their generative AI models.	
654-7	Ex. G – Excerpts of Reply Expert Report of Abhishek Nagaraj, Ph.D.	**Anthropic:** Yellow highlighted portions at p. 24, n.103	**Anthropic:** The highlighted portion of the document contains highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about sources of training dataset mixes and methods to obtain that data, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
Publishers' Motion in Limine to Partially Exclude the Opinions of Dr. Jeffrey Bilmes (ECF No. 655 *et seq.*)				
655	Motion in Limine to Exclude the Opinions of Dr. Jeffrey Bilmes	**Anthropic:** Yellow highlighted portion at pp.2, 4, 6-7	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the volume of Anthropic's training data, the number of lyric-containing URLs within the training data that were crawled in compliance with robots.txt, and the number of copies of works in suit left in training data post-Anthropic's deduplication processes, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			training their generative AI models.	
655-2	Ex. A – Expert Report of Jeffrey Bilmes, Ph.D.	**Anthropic:** Yellow highlighted portion at pp. 11, 13-14, 69-70, 73, 75-76, 80-81, 84, 86, 88, 93-94, 113-114, 126, 130,132-133, 135-152,155-156,170-171, 182-184, 186-191, 199, 201-202, 209,226, 228, 230-232, 248-256, 258-261, 276-277.	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about Anthropic's training data, such as the volume of training data, specific number of tokens used to train various Claude models, data acquisition strategy, the number of times particular pieces of data appear within the training data, confidential details regarding Anthropic's crawling efforts, detailed descriptions of Anthropic's deduplication methods, and internal model identifiers, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the operation, training methods, and development of Claude, including its content guardrails and defense systems. The release of this	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			information, including detailed descriptions of Anthropic's finetuning practices, trust and safety enforcement practices, internal monitoring tools, would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models, harming Anthropic. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information, including the cost of the guardrails, amount of content included within the guardrails, the dates Anthropic implemented or adjusted guardrails, the specific technical thresholds used in the guardrails, detailed descriptions of the technical implementation of the guardrails and its source code, would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain confidential non-public information relating to Anthropic's business practices and operations, including specific and sensitive metrics related to Claude usage, public disclosure of which would cause competitive harm to Anthropic. The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal technical operations, including specific and sensitive details about the internal data storage locations on Anthropic's servers and the datasets stored at those locations, public disclosure of which would harm Anthropic's ability to maintain proper security over its data by providing bad actors with the information needed to attempt to access those locations.	
655-3	Ex. B – Rebuttal Expert Report of Jeffrey Bilmes, Ph.D.	**Anthropic:** Yellow highlighted portions at pp. 10-12, 35, 50, 56, 58-60, 62-65, 68, 77, 83-84, 93, 97-98, 100-101, 103-	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
		107, 114-119, 134-135, 144-145, 147, 151-152, 157, 160, 195-205, 212-213.	Anthropic's training data, such as the volume of training data, specific number of tokens used to train various Claude models, data acquisition strategy, the number of times particular pieces of data appear within the training data with or without CMI, confidential details regarding Anthropic's crawling efforts, detailed descriptions of Anthropic's deduplication methods, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the operation, training methods, and development of Claude, including its content guardrails and defense systems. The release of this information, including detailed descriptions of Anthropic's finetuning practices, trust and safety enforcement practices, internal monitoring tools, would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models, harming Anthropic. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information, including the cost of the guardrails, amount of content included within the guardrails, the dates Anthropic implemented or adjusted guardrails, the specific technical thresholds used in the guardrails, detailed descriptions of the technical implementation of the guardrails and its source code, would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain confidential non-public information relating to Anthropic's business practices	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			and operations, including specific and sensitive metrics related to Claude usage, public disclosure of which would cause competitive harm to Anthropic. The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal technical operations, including specific and sensitive details about the internal data storage locations on Anthropic's servers and the datasets stored at those locations, public disclosure of which would harm Anthropic's ability to maintain proper security over its data by providing bad actors with the information needed to attempt to access those locations.	
655-4	Ex. C – Rebuttal Expert Report of Jeffrey Bilmes, Ph.D.	**Anthropic:** Yellow highlighted portions at pp. 9, 58, 60-61, 63-64, 73, 78, 80, 84-85, 100, 106-107, 111-115, 119, 125, 128-134, 140-144, 146-156, 160-161, 163-175, 178, 186.	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about Anthropic's training data, such as the volume of training data, specific number of tokens used to train various Claude models, data acquisition strategy, the number of times particular pieces of data appear within the training data with or without CMI, confidential details regarding Anthropic's crawling efforts, detailed descriptions of Anthropic's deduplication methods, public disclosure of which would cause	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the operation of Claude, including its content guardrails and defense systems. The release of this information, including whether and when models are deprecated internally, could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models, harming Anthropic. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information, including the cost of the guardrails, amount of content included within the guardrails, the dates Anthropic implemented or adjusted guardrails, the specific technical thresholds used in the	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			guardrails, detailed descriptions of the technical implementation of the guardrails and its source code, would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain confidential non-public information relating to Anthropic's business practices and operations, including specific and sensitive metrics related to Claude usage, public disclosure of which would cause competitive harm to Anthropic. The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal technical operations, including specific and sensitive details about the internal data storage locations on Anthropic's servers and the datasets stored at those locations, public disclosure of which would harm Anthropic's ability to maintain proper security over its data by providing bad actors with the information needed to attempt to access those locations.	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
655-5	Ex. D – J. Bilmes Dep. Transcript	**Anthropic**: Yellow highlighted portions at pg. 41:1-42:3; 151:18-158:15	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about Anthropic's training data, such as the names of training data files, observations of the contents of training data files, and the number of copies of works in suit left in training data post-Anthropic's deduplication processes, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
Publishers' Motion in Limine to Partially Exclude the Opinions of Dr. Andrew Bray (ECF No. 656 *et seq.*)				
656	Motion in Limine to Exclude the Opinions of Dr. Andrew Bray	**Anthropic:** Yellow highlighted portions at pp. ii, 1-3, 9-10	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the implementation technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information, including, e.g., the amount of content included, would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
656-2	Ex. A – Expert Report of Dr. Andrew Bray	**Anthropic:** Yellow highlighted portions at pp. 6-8, 9, 12, 40-43, Tbl. 1 at 1	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the implementation technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information, including, e.g., the amount of content included, would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	**Publishers' Objections:** Yellow highlighted portions at pp. 6-8: The names and descriptions of Content Compare and Prompt Shield systems are both publicly disclosed. *See Bartz*, ECF No. 555-7, at 4-5. Yellow highlighted portion at ¶ 24: Anthropic's specific use(s) of Publishers' lyrics is not confidential, forms the basis of the instant action, and bears directly on Anthropic's willful infringement of Publishers' lyrics. This fact has also been publicly disclosed by Anthropic. ECF No. 801-1 at 23. Disclosure of this fact would not threaten

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
				commercial or privacy harms.
656-3	Ex. B – Expert Reply Report of Dr. Andrew Bray	**Anthropic:** Yellow highlighted portions at Table of Contents, pp. 3, 23, 32, 33	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the implementation technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information, including, e.g., the amount of content included, would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
Publishers' Motion in Limine to Partially Exclude the Opinions of Julie Davis (ECF No. 657 *et seq.*)				
657	Motion in Limine to Partially Exclude the Opinions of Julie Davis	**Publishers:** Blue highlighted portion at p. 6.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information concerning Publisher revenue trends. Public disclosure of this information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
657-2	Ex. A – Expert Report and Disclosure of Julie L. Davis	**Publishers:** Blue highlighted portions at pp. 8–10; 12–23 & nn. 73–77, 82, 94–99, 103, 105, 114; 49–52 & nn. 298, 313. **Anthropic:** Yellow highlighted portions at pp. 25-28, 31-33, 35-38, 41, 43-44, 46-48	**Publishers:** Discloses confidential and non-public details about business arrangements with songwriters, copyright management strategies, controlled works, corporate structures, and other business management details and strategies. Discloses highly-confidential, non-public, and commercially sensitive license agreement terms, including royalty calculations and other financial details comprising trade secrets, as well as very detailed revenue data and analyses thereof. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers. **Anthropic:** The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's finances, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			in an effort to compete unfairly against Anthropic. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about sources of training dataset mixes and information regarding Claude usage metrics, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information regarding Anthropic's guardrails, would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			training their generative AI models.	
657-3	Ex. B – Rebuttal Expert Report and Disclosure of Julie L. Davis	**Publishers:** Blue highlighted portions at pp. 20–26 & nn. 93–98, 107–115, 117–20, 124-26; 28; 30–33. **Anthropic:** Yellow highlighted portions at Table of Contents, pp. 5-6, 8-9, 11, 13-14, 16-19, 28	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information concerning Publisher licensing agreements, including trade secrets, comprising royalty payment structures, fees, rights conferred, as well as information about Publisher revenue trends. Public disclosure of this information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers. **Anthropic:** The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's finances, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			operations, including specific and sensitive details about sources of training dataset mixes and information regarding Claude usage metrics, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
657-4	Ex. C – Reply Expert Report and Disclosure of Julie L. Davis	**Publishers:** Blue highlighted portions at pp. 9–12 & n.54. **Anthropic:** Yellow highlighted portions at pp. 7, 15	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information concerning Publisher licensing agreements, including trade secrets, comprising royalty payment structures, fees, rights conferred, as well as information about Publisher revenue trends. Public disclosure of this information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers. **Anthropic:** The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's finances, public	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic.	
Publishers' Motion in Limine to Partially Exclude the Opinions of Dr. Abhishek Nagaraj (ECF No. 659 *et seq.*)				
659	Motion in Limine to Partially Exclude the Opinions of Dr. Abhishek Nagaraj	**Anthropic:** Yellow highlighted portions at pp. 7, 8	**Anthropic:** The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's data acquisition strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic. The highlighted portions of the document contain confidential information about a licensing agreement between Anthropic and a non-party, revealing non-public details about the identity of an Anthropic partner who is not party to this litigation and who has a reasonable expectation that Anthropic will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. This text also reveals confidential, non-public information about the terms and conditions of the agreement,	**Publishers' Objections:** Yellow highlighted portions at p. 8:1, 3–4 constitute Publishers' arguments, not Anthropic's confidential information. Further, the fact that Anthropic has low value of lyrics is publicly disclosed. *See, e.g.,* ECF No. 209 ¶¶31-32.

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			including pricing and business strategy. The disclosure of this non-public information is likely to result in competitive harm to Anthropic, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Anthropic.	
659-2	Ex. A – Expert Report of Abhishek Nagaraj, Ph.D.	**Publishers:** Blue highlighted portions at ¶¶ 68–69 & nn. 111, 112, 113, 116; nn. 123, 124; ¶ 78; ¶ 91; ¶¶ 94–99 & nn. 136-38, nn. 140-41; nn. 143, 145; Figures 1 & 2; ¶ 100; pp. 77-78. **Anthropic:** Yellow highlighted portions at ¶¶ 23 & n.39; 36, 37 & n.47; 40 & n.56; 42 n.58; 46 & nn.68-69; 49 & n.77; 55 & n.80; 56 & nn.81, 84, 85; 58 & nn.88-91; 59 & n.93; 73; 80 & n.128; 111, 112, 113 n. 73; 115; 121, 123 & n. 182, 135 & n.189; 136, 143, 156,	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information concerning Publisher licensing agreements with AI companies, comprising licensing terms with non-party, status of negotiations with licensees, as well as information about Publisher revenue trends. Public disclosure of this information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers. **Anthropic:** The highlighted portions of the document contain confidential information about a licensing agreement between Anthropic and a non-party, revealing non-public details about the identity of an Anthropic partner who is not party to this litigation and who has a reasonable expectation that Anthropic will maintain the confidentiality of contractual terms and its own confidential	**Publishers' Objections:** Yellow highlighted portion at ¶ 73: The information is not confidential; Anthropic's entry into agreements is generic and stale information, disclosure of which would not threaten any commercial or privacy harm. Yellow highlighted portion at ¶ 80: The information reflects only high-level assertions about Anthropic's motivations for entering into agreements, does not disclose information about specific deals, and its disclosure would not cause

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
		159, 160, 161, 166, 176, 177, 178, 179, 180, 181.	statements made during negotiations. The disclosure of this non-public information is likely to result in competitive harm to Anthropic, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Anthropic. The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's data acquisition strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about sources of training dataset mixes and methods to obtain that data, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making	commercial or privacy harm.

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information, including the content included in the guardrails, would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
659-3	Ex. B – Expert Rebuttal Report of Abhishek Nagaraj, Ph.D.	**Publishers:** ¶¶ 96; n. 309; 140-141; n.312; ¶ 144 & Figure 4; n. 316; ¶ 147; Appendix B (p. 103); Table C.1 (pp. 107-108); Table C.2 (p. 109); Table C.3 (pp. 109-110); ¶ 180 & n. 375.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information concerning Publisher licensing agreements with AI companies, comprising licensing terms with non-party, as well as information about Publisher revenue trends and analyses. Public disclosure of this information would cause harm to Publishers, including but not limited to harms from market competitors who would use the	**Publishers' Objections:** Yellow highlighted portion at n.223 is not confidential information. Anthropic's entering into (or not entering into) agreements for data constitutes high-level and generic

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
		Anthropic: Yellow highlighted portions at ¶¶ 95 n.188; 104, 105 & n.211; 110 & n.223, n.227; 113 & n.233; 117 & n.244; 122, 123, 125, 142, 146, 147, 152 n.329, 162, 173, 179, 180, 181	unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers. **Anthropic:** The highlighted portions of the document contain confidential information about a licensing agreement between Anthropic and a non-party, revealing non-public details about the identity of an Anthropic partner who is not party to this litigation and who has a reasonable expectation that Anthropic will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. The disclosure of this non-public information is likely to result in competitive harm to Anthropic, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Anthropic. The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's finances, data acquisition strategy, and product development strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal,	information, disclosure of which would not cause commercial or privacy harm and also bears directly on Anthropic's willful infringement of Publishers' lyrics. Yellow highlighted portion at n.233: High-level description of Anthropic's scraping conduct is not confidential and does not implicate any privacy interest. Nor does Anthropic have any commercial or privacy interest in the robot.txt status of third-party websites it has scraped.

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about sources of training dataset mixes and the amount of tokens used in training, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			by Anthropic's competitors in training their generative AI models.	
659-4	Ex. C – Excerpts of the Deposition of Dr. Abhishek Nagaraj	**Anthropic:** Yellow highlighted portions at 34:19-20; 34:25-35:01; 39:11; 39:16-17; 61:17-18; 68:11-23.	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about sources of training dataset mixes and methods to obtain that data, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
659-5	Ex. D – Excerpts of the 30(b)(1) Deposition of Tom Turvey	**Anthropic:** Yellow highlighted portions at 41:1-42:9; 43:13-21; 43:25-44:25; 61:1-64:11; 64:13-64:25	**Anthropic:** The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's data acquisition strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic.	
659-6	Ex. E – Excerpts of the 30(b)(6) Deposition of Tom Turvey	**Anthropic:** Yellow highlighted portions at 38:2-40:2, 40:5-41:23, 42:1-15	**Anthropic:** The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes,	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			and strategy, including specific information regarding Anthropic's finances and data acquisition strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic. The highlighted portions of the document contain confidential information about licensing and commercial agreements between Anthropic and non-parties, revealing non-public details about the identity of Anthropic partners who are not parties to this litigation and who have a reasonable expectation that Anthropic will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. This text also reveals confidential, non-public information about the terms and conditions of certain agreements, including pricing and business strategy. The disclosure of this non-public information is likely to result in competitive harm to Anthropic, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Anthropic.	
Anthropic's Motion in Limine to Exclude Expert Testimony and Opinions of Ben Zhao (ECF No. 663 *et seq.*)				

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
663	Motion in Limine to Exclude Expert Testimony and Opinions of Ben Zhao	**Anthropic:** Yellow highlighted portion at p. 10	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information, including the amount of content included within the guardrails and the dates Anthropic implemented or adjusted guardrails, would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	**Publishers' Objections:** Yellow highlighted portion regarding the strengthening of its output guardrails to address Publishers' lyrics specifically is not confidential, forms the basis of the instant action, and bears directly on Anthropic's willful infringement of Publishers' lyrics. This fact has also been publicly disclosed by Anthropic. ECF No. 801-1 at 23. Disclosure of this fact would not threaten commercial or privacy harms.
663-1	Ex. 1 – Opening Expert Report of Dr. Ben Zhao	**Anthropic:** Yellow highlighted portion at pp. 18-19, 24, 31, 37-38, 41-51	**Anthropic:** The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's data acquisition strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations	**Publishers' Objections:** Yellow highlighted portion at n.165 constitutes stale information reflecting generic goals that bears directly on Anthropic's willful infringement of Publishers' lyrics.

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			in an effort to compete unfairly against Anthropic. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about Anthropic's training data, such as the number of times particular pieces of data appear within the training data, confidential details regarding Anthropic's crawling efforts, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the operation, training methods, and development of Claude, including its defense systems. The release of this information, including the confidential name of an internal development model, detailed descriptions of Anthropic's finetuning practices, could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			training their generative AI models, harming Anthropic. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information, including the amount of content included within the guardrails, the dates Anthropic implemented or adjusted guardrails, the specific technical thresholds used in the guardrails, detailed descriptions of the technical implementation of the guardrails and its source code, would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain confidential non-public information relating to Anthropic's business practices and operations, including specific and sensitive metrics related to Claude usage, public disclosure	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			of which would cause competitive harm to Anthropic.	
663-2	Ex. 2 – Rebuttal Expert Report of Dr. Ben Zhao	**Anthropic:** Yellow highlighted portion at pp. 30, 36, 39; 42-43	**Anthropic:** The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's product development strategy regarding deployment risks, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about Anthropic's training data, such as the number of times particular pieces of data appear within the training data, the weight assigned to particular categories of data during training, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in	**Publishers' Objections:** Yellow highlighted portion at ¶ 86 disclosing generic and high-level information about the presence of Publishers' lyrics in Anthropic's training datasets from crawling behavior does not constitute confidential information and disclosure of such information would not cause commercial or privacy harm.

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			training their generative AI models. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information, including the amount of content included within the guardrails and the dates Anthropic implemented or adjusted guardrails, would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
663-3	Ex. 3 – Reply Expert Report of Dr. Ben Zhao	**Anthropic:** Yellow highlighted portion at pp. 16, 26-27, 31, 35, 37-40; 42, 46.	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the operation, training methods, and development of Claude, including its defense systems. The release of this information, including detailed descriptions of	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			Anthropic's finetuning practices, could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models, harming Anthropic. The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's product development strategy and safety objectives, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about Anthropic's training data, such as the total volume of Anthropic's training data, detailed descriptions of Anthropic's deduplication processes, confidential details regarding Anthropic's crawling efforts, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information, including the amount of content included within the guardrails and the dates Anthropic implemented or adjusted guardrails, information about the technical implementation of the guardrails, how the guardrails function and interact with one another, would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain confidential non-public information relating to Anthropic's business practices and operations, including specific and sensitive metrics related to	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			Claude usage, public disclosure of which would cause competitive harm to Anthropic.	
663-6	Ex. 6 – Anthropic's Amended and Supplemental Responses and Objections to Plaintiffs' Interrogatory Request Nos. 9, 11, 12	**Anthropic:** Yellow highlighted portions at pp. 12-14	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information, including the amount of content included within the guardrails, the dates Anthropic implemented or adjusted guardrails, and specific technical thresholds used in the guardrails, would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	**Publishers' Objections:** Yellow highlighted portion at 14:3-4 regarding the strengthening of its output guardrails to address Publishers' lyrics specifically is not confidential, forms the basis of the instant action, and bears directly on Anthropic's willful infringement of Publishers' lyrics. This fact has also been publicly disclosed by Anthropic. ECF No. 801-1 at 23. Disclosure of this fact would not threaten commercial or privacy harms.
Anthropic's Notice of Motion and Motion to Exclude Expert Testimony and Opinions of Joshua Dennis (ECF No. 666 *et seq.*)				
666-1	Ex. 1 – Expert Report of Dr. Shawn Shan	**Anthropic:** Yellow highlighted portions at pp. 25-26	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about Anthropic's training data, such as the number of times particular	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			pieces of data appear within the training data, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information, including the amount of content included within the guardrails, the dates Anthropic implemented or adjusted guardrails, detailed descriptions of the technical implementation of the guardrails, would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
666-2	Ex. 2 – Expert Report of	**Anthropic:** Yellow highlighted	**Anthropic:** The highlighted portions of the document contain	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
	Joshua W. Dennis	portions at pp. 19-20, 23-24, 27, 29, 100, 102, 113-122	highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the implementation technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information, including, e.g., the amount of content included, would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain confidential non-public information relating to Anthropic's business practices and operations, including specific and sensitive metrics related to Claude usage, public disclosure of which would cause competitive harm to Anthropic.	
666-3	Ex. 3 – Reply Expert Report and Supplemental Report of Joshua W. Dennis	**Anthropic:** Yellow highlighted portions at pp. 7-8, 11, 104-106, 108, 119-120	**Anthropic:** The highlighted portions of the document contain confidential non-public information relating to Anthropic's business practices and operations, including specific and sensitive metrics related to Claude usage, public disclosure of which would cause competitive harm to Anthropic.	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
666-8	Ex. 9 – Excerpts of the Rebuttal Expert Opinion of Professor Michael D. Smith	**Anthropic:** Yellow highlighted portion at ¶ 127	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	**Publishers' Objections:** Quoted portion only reflects publicly-available Google trends data in which Anthropic does not have genuine privacy interests.
666-9	Ex. 10 – Excerpts of the Expert Reply Opinion of Professor Michael D. Smith	**Anthropic:** Yellow highlighted portion at ¶¶ 161, 162, 163.	**Anthropic:** The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's finances, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic.	
Anthropic's Notice of Motion and Motion to Exclude Expert Testimony and Opinions of Michael. D. Smith (ECF No. 681 *et seq.*)				
681	Defendant's Notice of	**Publishers:**	**Publishers:** Discloses highly confidential,	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
	Motion and Motion to Exclude Expert Testimony and Opinions of Michael. D. Smith	Blue highlighted portion at p. 6.	non-public, and commercially sensitive information concerning Publisher revenue trends and analyses. Public disclosure of this information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
681-1	Ex. 1 – Expert Report of Professor Michael D. Smith	**Publishers:** Blue highlighted portions at ¶¶ 36-38 & nn.26, 28, 30; ¶¶ 40-42; ¶ 93 & nn.79-80; ¶ 98 & n.84; ¶¶ 122–132 & nn. 105, 106; ¶¶ 134-35; ¶ 158; ¶¶ 163-64; ¶ 169; ¶ 172 & n.119; ¶ 174. **Anthropic:** Yellow highlighted portions at ¶¶ 105, 106, 146, 147, 148, 149, 150, 151, 152, 154, 155, 156, 193, 194, 205	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information concerning Publisher licensing agreements, including trade secrets, comprising licensing terms with non-party, fee structures, royalty payments, scope of rights conferred, status of negotiations with licensees and AI companies. Public disclosure of this information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers. **Anthropic:** The highlighted portions of the document contain confidential information about a licensing agreement between Anthropic and a non-party, revealing non-public details about the identity of an Anthropic partner who is not party to this litigation and who has a reasonable expectation that Anthropic will maintain the confidentiality of contractual	**Publishers' Objections:** Yellow highlighted portions at ¶¶ 105, 106, 154, 156 constitute generic information about Anthropic data acquisition policies that are matters of public concern as they implicate third-party data. In particular, Anthropic's policy concerning communications to rightsholders regarding their works is a matter of public concern, especially to the rightsholders affected, nor does Anthropic have a privacy interest in others' copyrighted works. Disclosure of such

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			terms and its own confidential statements made during negotiations. This text also reveals confidential, non-public information about the terms and conditions of the agreement, including pricing and business strategy. The disclosure of this non-public information is likely to result in competitive harm to Anthropic, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Anthropic. The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's data acquisition strategy and product development strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic. The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's views of its competitors in various product markets. Disclosure of this non-	information would not cause commercial or privacy harm.

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			public information is likely to result in competitive harm to Anthropic, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Anthropic.	
681-2	Ex. 2 – Rebuttal Expert Opinion of Prof. Michael D. Smith	**Publishers:** Blue highlighted portions at ¶¶ 16; 148. **Anthropic:** Yellow highlighted portions at ¶¶ 24, 31, 34, 43, 44, 48, 49, 50, 55, 57 & n.40, 59, 71, 74, 75, 76 & n.41; 85, 88, 127, 130, 147	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information concerning Publisher licensing agreements, including trade secrets, comprising licensing terms with non-party, fee structures, and scope of rights conferred. Public disclosure of this information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers. **Anthropic:** The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's data acquisition strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to	**Publishers' Objections:** Yellow highlighted portions at ¶¶ 24, 31, 34, 43–44, 55, 85, 88, 127, 130, 147 concerning Anthropic's entering into (or not entering into) agreements constitutes generic and stale information that does not implicate any privacy interest. Yellow highlighted portion at ¶ 49 does not implicate any privacy interest when the subject concerns Anthropic's covering up of infringement conduct which is at issue in this litigation. Anthropic's policy concerning communications

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			compete unfairly against Anthropic. The highlighted portions of the document contain confidential information about a licensing agreement between Anthropic and a non-party, revealing non-public details about the identity of an Anthropic partner who is not party to this litigation and who has a reasonable expectation that Anthropic will maintain the confidentiality its own confidential statements made during negotiations. The disclosure of this non-public information is likely to result in competitive harm to Anthropic, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Anthropic. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about sources of training dataset mixes and methods to obtain that data and the quantities of tokens used to train Claude, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in	to rightsholders regarding their works is a matter of public concern, especially to the rightsholders affected, nor does Anthropic have a privacy interest in others' copyrighted works. Disclosure of such information would not cause commercial or privacy harm. Yellow highlighted portion at ¶ 50 (except specific monetary figures): The fact that Anthropic has entered into a deal for lyrics is generic, stale, and does not implicate any privacy interest.

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			training their generative AI models. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain confidential information about a licensing agreement between Anthropic and a non-party. The disclosure of this non-public information is likely to result in competitive harm to Anthropic, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Anthropic.	
681-3	Ex. 3 – Expert Reply	**Publishers:** Blue highlighted	**Publishers:** Discloses highly confidential, non-public, and commercially	**Publishers' Objections:**

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
	Opinion of Professor Michael D. Smith	portions at ¶¶ 45, 110, 152, 154 & n.112; ¶ 156 & n.113. **Anthropic:** Yellow highlighted portions at ¶¶ 10 & n.11; 87, 88, 89 & n.85; 102, 161, 162, 163	sensitive information concerning Publisher licensing agreements, including trade secrets, comprising licensing terms with non-party, fee structures, scope of rights conferred, as well as information about Publisher revenue trends and analyses. Public disclosure of this information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers. **Anthropic:** The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's finances and data acquisition strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic.	Yellow highlighted portions at ¶¶ 10, 87–88: Anthropic's entering into (or not entering into) agreements constitutes generic and stale information that does not implicate any privacy interest. Anthropic's policy concerning communications to rightsholders regarding their works is a matter of public concern, especially to the rightsholders affected, nor does Anthropic have a privacy interest in others' copyrighted works. Disclosure of such information would not cause commercial or privacy harm.
681-5	Ex. 7 – M. Smith Transcript	**Publishers:** Blue highlighted portions at 169:1–172:25; 273:20–276:25; 297:4–9; 350:5–352:9; 356:8–359:9.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information concerning Publisher licensing agreements, including scope of rights conferred, status of licensing negotiations, as well as information about Publisher	**Publishers' Objections:** Highlighted portions at 261:04-06; 261:14-16 do not constitute confidential information.

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
		Anthropic: Yellow highlighted portions at 128:19; 152:17; 261:4-6; 261:14-16	revenue trends and analyses, including quantified impact on revenues. Public disclosure of this information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers. **Anthropic:** The highlighted portions of the document contain personally identifiable information of Anthropic's employees. This text should be sealed because it reveals personally identifiable information of Anthropic's employees, who have a legitimate, legally recognized privacy interest in protecting their contact information from public disclosure. If their contact information were to be publicly disclosed, they may be subject to repeated inquiries from the press or members of the general public, which could rise to the level of threats or harassment, given the current media attention on Anthropic. See, e.g., *Benedict v. Hewlett-Packard Co.*, 2014 WL 233827, at *3 (N.D. Cal. Jan. 21, 2014) (granting motion to seal personal information, including a home address, phone number, and email address). The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business	Anthropic's policy concerning communications to rightsholders regarding their works is a matter of public concern, especially to the rightsholders affected, nor does Anthropic have a privacy interest in others' copyrighted works. Disclosure of such information would not cause commercial or privacy harm.

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			operations, systems, processes, and strategy, including specific information regarding Anthropic's finances, data acquisition strategy, and product development strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic.	
681-7	Ex. 9 – Excerpts of the Expert Report of Abhishek Nagaraj, Ph.D.	**Publishers:** Blue highlighted portions at ¶ 91; ¶¶ 94-99 & nn. 136-38, nn. 140-41; nn. 143, 145 & Figures 1 & 2; ¶ 100. **Anthropic:** Yellow highlighted portions at ¶¶ 111, 112 & n.173; 115; 121, 123 & n.182; 135 & n.189; 136; 143	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information concerning Publisher revenue trends and analyses. Public disclosure of this information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers. **Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
681-8	Ex. 11 – Expert Report and Disclosure of Julie L. Davis	**Publishers:** Blue highlighted portions at pp. 49–52 & nn. 298, 313. **Anthropic:** Yellow highlighted portions at p. 48.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information concerning Publisher revenue trends and analyses. Public disclosure of this information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers. **Anthropic:** The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's finances, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic.	
Anthropic's Motion for Summary Judgment and Opposition to Publishers' Motion for Partial Summary Judgment (ECF No. 694 *et seq.*)				
694	Anthropic's Motion for Summary	**Publishers:** Blue highlighted	**Publishers:** Discloses highly confidential, non-public, and commercially	**Publishers' Objections:**

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
	Judgment and Opposition to Publishers' Motion for Partial Summary Judgment (Corrected), ECF No. 694	portions at pp. 6-7, 20–21. **Anthropic:** Yellow highlighted portions at pp. 3, 6, 7, 18, 19, 20, 27, 28,	sensitive information concerning licensing agreement terms, negotiations with licensees/potential licensees, and other financial information. Discloses highly confidential, non-public, and commercially sensitive information concerning Publishers' enforcement practices and investigations into infringement. Public disclosure of this information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers. Public disclosure of this information would cause harm to Publishers arising from potential infringers seeking to avoid detection of potential or ongoing infringement of Publishers' copyrights. **Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information, including the type of content included within its guardrails, would harm Anthropic's ability to safeguard	Yellow highlighted portion at p. 6 beginning after "checks" constitutes information that has already been disclosed. *See Bartz,* ECF No. 555-7, at 4–5. Yellow highlighted portion at p. 27 beginning after "against a" constitutes information that has already been publicly disclosed. *See Bartz*, ECF No. 555-7.

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about sources of training dataset mixes, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models	
687-1	Anthropic's Moving Separate Statement in Support of Motion for Summary Judgment	**Publishers:** Blue highlighted portions at pp. 14-16; 19; 28-29. **Anthropic:** Yellow highlighted portions at pp. 17-18, 23-24, 26-28	**Publishers:** Discloses confidential, non-public, and commercially sensitive information concerning business strategies about copyright management and Publishers' enforcement practices and investigations into infringement. Public disclosure of this information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to	**Publishers' Objections:** Yellow highlighted portions at pp. 27 (Fact # 117); 28 (Fact # 119) regarding the strengthening of its output guardrails to address Publishers' lyrics specifically are not confidential, form the basis of

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			gain insight into business strategies to undercut and unfairly outcompete Publishers, as well as harm from potential infringers seeking to avoid detection of potential or ongoing infringement of Publishers' copyrights. **Anthropic:** The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's data acquisition strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the composition and creation of training dataset mixes, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in	the instant action, and bear directly on Anthropic's willful infringement of Publishers' lyrics. This fact has also been publicly disclosed by Anthropic. ECF No. 801-1 at 23. Disclosure of this fact would not threaten commercial or privacy harms.

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			training their generative AI models. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information, including the dates Anthropic instituted its various guardrails, would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
687-2	Anthropic's Response to Plaintiffs' Moving Separate Statement in Support of Motion for Partial Summary Judgment	**Publishers:** Blue highlighted portions at pp. 44-45; 47-49; 51; 96-97; 113-14; 116-17; 123; 126-29. **Anthropic:** Yellow highlighted portions at pp. 5-7, 9, 27, 57-61, 63, 65-72, 74-75, 80-81,	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information concerning licensing agreement terms, negotiations with licensees/potential licensees, and other financial information. Discloses confidential, non-public, and commercially sensitive information concerning business strategies about copyright management and Publishers' enforcement practices and investigations into infringement.	**Publishers' Objections:** Yellow highlighted portion at p. 61 (Fact 88): The fact that Anthropic added Publishers' Works to their guardrails is not confidential; Anthropic does not have a

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
		88, 92, 108, 117-18, 122-23, 125	Public disclosure of this information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and outcompete Publishers and from potential infringers seeking to avoid detection of potential or ongoing infringement of Publishers' copyrights. **Anthropic:** The highlighted portions of the document contain confidential information about a licensing agreement between Anthropic and a non-party, revealing non-public details about the identity of an Anthropic partner who is not party to this litigation and who has a reasonable expectation that Anthropic will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. The disclosure of this non-public information is likely to result in competitive harm to Anthropic, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Anthropic. The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business	privacy interest in their use of Publishers' Works. Yellow highlighted portion at pp. 117-18 (Fact 212): The fact that Anthropic has entered into a license is not commercially sensitive and bears directly on Anthropic's willful infringement of Publishers' lyrics and would not threaten any commercial or privacy harms; other AI developers, including Anthropic's direct competitors Google and OpenAI, publicize their content licensing deals.

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			operations, systems, processes, and strategy, including specific information regarding Anthropic's data acquisition strategy, commercialization strategy, and/or product development strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic. The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's views of its competitors in various product markets. Disclosure of this non-public information is likely to result in competitive harm to Anthropic, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Anthropic. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the creation of and sources of training dataset mixes, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the operation, training, and development of Claude's content guardrails. The release of this information would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information, including the dates Anthropic instituted its various guardrails, would harm Anthropic's ability to safeguard	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain confidential non-public information relating to Anthropic's business practices and operations, including specific and sensitive metrics related to Claude usage, public disclosure of which would cause competitive harm to Anthropic.	
687-4	Ex. 2 – Expert Report of Jeffrey Bilmes, Ph.D.	**Anthropic:** Yellow highlighted portion at pp. 11, 13-14, 69-70, 73, 75-76, 80-81, 84, 86, 88, 93-94, 113-114, 126, 130-132-133, 135-152, 155-156, 170-171, 182-184, 186-191, 199, 201-202, 209, 226, 230-232, 248-256, 258-261, 276-277.	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about Anthropic's training data, such as the volume of training data, specific number of tokens used to train various Claude models, data acquisition strategy, the number of times particular pieces of data appear within the training data, confidential details regarding Anthropic's crawling efforts, detailed descriptions of Anthropic's deduplication methods, and internal model identifiers, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the operation, training methods, and development of Claude, including its content guardrails and defense systems. The release of this information, including detailed descriptions of Anthropic's finetuning practices, trust and safety enforcement practices, internal monitoring tools, would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models, harming Anthropic. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the technological guardrails that	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			Anthropic designed to inhibit the replication of copyrighted content. The release of this information, including the cost of the guardrails, amount of content included within the guardrails, the dates Anthropic implemented or adjusted guardrails, the specific technical thresholds used in the guardrails, detailed descriptions of the technical implementation of the guardrails and its source code, would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain confidential non-public information relating to Anthropic's business practices and operations, including specific and sensitive metrics related to Claude usage, public disclosure of which would cause competitive harm to Anthropic. The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal technical operations, including specific and sensitive details about the internal data storage locations on Anthropic's servers and the	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			datasets stored at those locations, public disclosure of which would harm Anthropic's ability to maintain proper security over its data by providing bad actors with the information needed to attempt to access those locations.	
687-5	Ex. 3 – Opening Expert Report of Dr. Andrew Bray	**Anthropic:** Yellow highlighted portions at pp. 6-8, 9, 12, 40-43, Tbl. 1 at 1	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the implementation technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information, including, e.g., the amount of content included, would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	**Publishers' Objections:** Yellow highlighted portions at pp.6-8: The names and descriptions of Content Compare and Prompt Shield systems are both publicly disclosed. *See Bartz*, ECF No. 555-7, at 4-5. Yellow highlighted portion at ¶ 24: The strengthening of its guardrails to address Publishers' lyrics specifically is not confidential, forms the basis of the instant action, and bears directly on Anthropic's willful infringement of Publishers' lyrics. This fact has also been publicly disclosed by Anthropic. ECF No. 801-1 at 23. Disclosure of this

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
				fact would not threaten commercial or privacy harms.
687-6	Ex. 4 – Expert Report and Disclosure of Julie L. Davis	**Publishers:** Blue highlighted portions at pp. 8–10; 12–23 & nn. 73–77, 82, 94–99, 103, 105, 114; 49–52 & nn. 298, 313. **Anthropic:** Yellow highlighted portions at pp. 25-26, 27, 28, 31-33, 35-38, 41, 43-44, 46-48	**Publishers:** Discloses confidential and non-public details about business arrangements with songwriters, copyright management strategies, corporate structures, and other business management details and strategies. Discloses highly-confidential, non-public, and commercially sensitive license agreement terms, including royalty calculations, revenue data, and other financial details comprising trade secrets. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers. **Anthropic:** The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's finances, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal,	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about sources of training dataset mixes and information regarding Claude usage metrics, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information regarding Anthropic's guardrails, would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			and business strategies employed by Anthropic's competitors in training their generative AI models.	
687-8	Ex. 6 – Expert Report of Abhishek Nagaraj, Ph.D.	**Publishers:** Blue highlighted portions at ¶¶ 68–69 & nn. 111, 112, 113, 116; nn. 123, 124; ¶ 78; ¶ 91; ¶¶ 94-99 & nn. 136-38, nn. 140-41; nn. 143, 145; Figures 1 & 2; ¶ 100; pp. 77-78. **Anthropic:** Yellow highlighted portions at ¶¶ 23 & n.39; 36, 37 & n.47; 40 & n.56; 42 n.58; 46 & nn.68-69; 49 & n.77; 55 56 & nn.81, 84, 85; 58 & nn.88-91; 59 & n.93; 73; 80 & n.128; 111, 112, 113 n. 173; 115 & Fig. 3; 121 at Tbl. 1, 123 & n.182, 135 & n.189; 136, 143 at Tbl. 2, 156, 159 at Tbl. C.10, 160 at Tbl. C.11, 161 at Tbl. C.12, 166 at Figs. C.4, C.5, 176 at	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information concerning Publisher licensing agreements with AI companies, comprising licensing terms with non-party, status of negotiations with licensees, as well as information about Publisher revenue trends. Public disclosure of this information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers. **Anthropic:** The highlighted portions of the document contain confidential information about a licensing agreement between Anthropic and a non-party, revealing non-public details about the identity of an Anthropic partner who is not party to this litigation and who has a reasonable expectation that Anthropic will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. The disclosure of this non-public information is likely to result in competitive harm to Anthropic, as it reveals strategic decision-making, which, for example, could give a	**Publishers' Objections:** Yellow highlighted portion at ¶ 73: The information is not confidential; Anthropic's entry into agreements is generic and stale information, disclosure of which would not threaten any commercial or privacy harm. Yellow highlighted portion at ¶ 80: The information reflects only high-level assertions about Anthropic's motivations for entering into agreements, does not disclose information about specific deals, and its disclosure would not cause commercial or privacy harm.

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
		Tbl. C.14, 177 at Tbl. C.15, 178 at Tbl. C.16, 179 at Tbl. C.17, 180 at Tbl. C.18, 181 at Tbl. C.19	competitor or potential business partner unfair leverage in competing against or negotiating with Anthropic. The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's data acquisition strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about sources of training dataset mixes and methods to obtain that data, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about sources of	

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			training dataset mixes and methods to obtain that data, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information, including the content included in the guardrails, would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's views of its competitors in various product markets. Disclosure of this non-	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			public information is likely to result in competitive harm to Anthropic, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Anthropic.	
687-9	Ex. 7 – Expert Report of Dr. Shawn Shan	**Anthropic:** Yellow highlighted portions at pp. 13-15, 19, 21-23, 25-31, Ex. D (pp. 1-9), Ex. E (pp. 1-144), Ex. F (1 pg.), Ex. G (4 pgs), Ex. H (pp. 1-8), Ex. I (pp.1-492), Ex. K (1 pg.), Ex. L (2 pgs.)	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about Anthropic's training data, such as the names of specific training data files, the number of times particular pieces of data appear within the training data, the weigh assigned to specific categories of data during training, the data range and volume of certain datasets Anthropic acquired for training, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information, including the amount of content included within the guardrails, the dates Anthropic implemented or adjusted guardrails, detailed descriptions of the technical implementation of the guardrails and the source code, the thresholds used in guardrails, would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
687-10	Ex. 8 – Expert Report of Professor Michael D. Smith	**Publishers:** Blue highlighted portions at ¶¶ 36-38 & nn.26, 28, 30; ¶¶ 40-42; ¶ 93 & nn.79-80; ¶ 98 & n.84; ¶¶ 122–132 & nn. 105, 106; ¶¶ 134-35; ¶ 158; ¶¶ 163-64; ¶ 169; ¶ 172 & n.119; ¶ 174. **Anthropic:** Yellow highlighted portions at ¶¶ 105, 106, 146,	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information concerning licensing agreement terms, including the scope of rights conferred, and discussions with potential licensees, including AI companies. Discloses financial information, including trade secrets, comprising fee structures and royalty payments. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to	**Publishers' Objections:** Yellow highlighted portions at ¶¶ 105, 106, 154, 156 constitute generic information about Anthropic data acquisition policies that are matters of public concern as they implicate third-party data. In particular, Anthropic's policy concerning communications

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
		147, 148, 149, 150, 151, 152, 154, 155, 156, 193 & Fig. 1, 194 & Fig. 2, 204	gain insight into business strategies to undercut and unfairly outcompete Publishers. **Anthropic:** The highlighted portions of the document contain confidential information about a licensing agreement between Anthropic and a non-party, revealing non-public details about the identity of an Anthropic partner who is not party to this litigation and who has a reasonable expectation that Anthropic will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. This text also reveals confidential, non-public information about the terms and conditions of the agreement, including pricing and business strategy. The disclosure of this non-public information is likely to result in competitive harm to Anthropic, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Anthropic. The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's data acquisition strategy and product development strategy, public disclosure of which would	to rightsholders redarding their works is a matter of public concern, especially to the rightsholders affected, nor does Anthropic have a privacy interest in others' copyrighted works. Disclosure of such information would not cause commercial or privacy harm.

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic.	
687-12	Ex. 10 – Expert Report of Dr. Ben Zhao	**Anthropic:** Yellow highlighted portion at pp. 18-19, 24, 31, 37-38, 41-51.	**Anthropic:** The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's data acquisition strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about Anthropic's training data, such as the number of times particular pieces of data appear within the training data, confidential details regarding Anthropic's crawling efforts, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed	**Publishers' Objections:** Yellow highlighted portion at n.165 constitutes stale information reflecting generic goals that bears directly on Anthropic's willful infringement of Publishers' lyrics.

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the operation, training methods, and development of Claude, including its defense systems. The release of this information, including the confidential name of an internal development model, detailed descriptions of Anthropic's finetuning practices, would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models, harming Anthropic. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information, including the amount of content included within the	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			guardrails, the dates Anthropic implemented or adjusted guardrails, the specific technical thresholds used in the guardrails, detailed descriptions of the technical implementation of the guardrails and its source code, would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain confidential non-public information relating to Anthropic's business practices and operations, including specific and sensitive metrics related to Claude usage, public disclosure of which would cause competitive harm to Anthropic.	
687-13	Ex. 11 – Expert Rebuttal Report of Jeffrey Bilmes, Ph.D.	**Anthropic:** Yellow highlighted portions at pp. 10-12, 35, 50, 56, 58-60, 62-65, 68, 77, 83-84, 93, 97-98, 100-101, 103-107, 114-119, 134-135, 144-145, 147, 151-152, 157,	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about Anthropic's training data, such as the volume of training data, specific number of tokens used to train various Claude models, data acquisition strategy, the number	

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		160, 195-205, 212-213.	of times particular pieces of data appear within the training data with or without CMI, confidential details regarding Anthropic's crawling efforts, detailed descriptions of it deduplication methods, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the operation, training methods, and development of Claude, including its content guardrails and defense systems. The release of this information, including detailed descriptions of Anthropic's finetuning practices, trust and safety enforcement practices, internal monitoring tools, would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			training their generative AI models, harming Anthropic. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information, including the cost of the guardrails, amount of content included within the guardrails, the dates Anthropic implemented or adjusted guardrails, the specific technical thresholds used in the guardrails, detailed descriptions of the technical implementation of the guardrails and its source code, would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain confidential non-public information relating to Anthropic's business practices and operations, including specific and sensitive metrics related to Claude usage, public disclosure	

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			of which would cause competitive harm to Anthropic. The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal technical operations, including specific and sensitive details about the internal data storage locations on Anthropic's servers and the datasets stored at those locations, public disclosure of which would harm Anthropic's ability to maintain proper security over its data by providing bad actors with the information needed to attempt to access those locations.	
687-14	Ex. 12 – Rebuttal Expert Report of Dr. Andrew Bray	**Anthropic:** Yellow highlighted portions at pp. 5, 28, 30	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the implementation technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information, including, e.g., the amount of content included, would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in	

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			training their generative AI models.	
687-15	Ex. 13 – Expert Opposition Report of Joshua W. Dennis	**Anthropic:** Yellow highlighted portions at pp. 5-6, 66, 68-69, 71, 75	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the implementation technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information, including, e.g., the amount of content included, would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain confidential non-public information relating to Anthropic's business practices and operations, including specific and sensitive metrics related to Claude usage, public disclosure of which would cause competitive harm to Anthropic.	
687-17	Ex. 15 – Expert Rebuttal Report of Abhishek Nagaraj, Ph.D.	**Publishers:** Blue highlighted portions at ¶¶ 68-69 & nn. 111, 112, 113, 116; nn. 123,	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information concerning Publisher licensing agreements with AI companies, comprising licensing terms with non-party, as	**Publishers' Objections:** Yellow highlighted portion at n.223 is not confidential information.

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		124; ¶ 78; ¶ 91; ¶¶ 94-99 & nn. 136-38, nn. 140-41; nn. 143, 145; Figures 1 & 2; ¶ 100; pp. 77-78. **Anthropic:** Yellow highlighted portions at ¶¶ 95 n.188; 104, 105 & n.211; 110 & n.223, n.227; 113 & n.233; 117 & n.244; 122, 123, 125, 142, 146, 147, 152 & n.329, 162, 173, 179, 180, 181	well as information about Publisher revenue trends and analyses. Public disclosure of this information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers. **Anthropic:** The highlighted portions of the document contain confidential information about a licensing agreement between Anthropic and a non-party, revealing non-public details about the identity of an Anthropic partner who is not party to this litigation and who has a reasonable expectation that Anthropic will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. The disclosure of this non-public information is likely to result in competitive harm to Anthropic, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Anthropic. The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's	Anthropic's entering into agreements for data constitutes high-level and generic information, disclosure of which would not cause commercial or privacy harm and also bears directly on Anthropic's willful infringement of Publishers' lyrics. Yellow highlighted portion at n.233: High-level description of Anthropic's scraping conduct is not confidential and does not implicate any privacy interest. Nor does Anthropic have any commercial or privacy interest in the robot.txt status of third-party websites it has scraped.

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			finances, data acquisition strategy, and product development strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about sources of training dataset mixes and the amount of tokens used in training, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about sources of training dataset mixes and the amount of tokens used in training, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed	

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			by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
687-18	Ex. 16 – Rebuttal Expert Report of Dr. Shawn Shan	**Anthropic:** Yellow highlighted portions at pp. 4, 8, 13-14	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about Anthropic's training data, such as the number of times particular pieces of data appear within the training data, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business	**Publishers' Objections:** Yellow highlighted portions substantively reflect information already publicly disclosed. *Bartz*, ECF No. 555-7, at 4–5.

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information, including the amount of content included within the guardrails, detailed descriptions of the technical implementation of the guardrails and the source code, would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
687-19	Ex. 17 – Rebuttal Expert Opinion of Professor Michael D. Smith	**Publishers:** Blue highlighted portions at ¶¶ 16; 148. **Anthropic:** Yellow highlighted portions at ¶¶ 24, 31, 34, 43,	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information concerning licensing agreement terms, including the scope of rights conferred. Discloses financial information, including trade secrets, comprising confidential fee structures.	**Publishers' Objections:** Yellow highlighted portions at ¶¶ 24, 31, 34, 43–44, 55, 85, 88, 127, 130, 147 concerning Anthropic's entering into (or not entering into)

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
		44, 48, 49, 50, 55, 57, 59, 71, 74, 75, 76 & n.40; 84, 85, 88, 127, 130, 147	Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers. **Anthropic:** The highlighted portion of the document contains confidential information about a licensing agreement between Anthropic and a non-party, revealing non-public details about the identity of an Anthropic partner who is not party to this litigation and who has a reasonable expectation that Anthropic will maintain the confidentiality its own confidential statements made during negotiations. The disclosure of this non-public information is likely to result in competitive harm to Anthropic, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Anthropic. The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's data acquisition strategy, public disclosure of	agreements constitutes generic and stale information that does not implicate any privacy interest. Yellow highlighted portion at ¶ 49 does not implicate any privacy interest when the subject concerns Anthropic's covering up of infringement conduct which is at issue in this litigation. Anthropic's policy concerning communications to rightsholders regarding their works is a matter of public concern, especially to the rightsholders affected, nor does Anthropic have a privacy interest in others' copyrighted works. Disclosure of such information would not cause commercial or privacy harm. Yellow highlighted

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			which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic. The highlighted portion of the document contains highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about sources of training dataset mixes and methods to obtain that data and the quantities of tokens used to train Claude, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a	portion at ¶ 50 (except specific monetary figures): The fact that Anthropic has entered into a deal for lyrics is generic, stale, and does implicate any privacy interests.

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain confidential information about a licensing agreement between Anthropic and a non-party. The disclosure of this non-public information is likely to result in competitive harm to Anthropic, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Anthropic.	
687-20	Ex. 18 – Rebuttal Expert Report of Dr. Ben Zhao	**Anthropic:** Yellow highlighted portion at pp. 30, 36, 39, 42-43	**Anthropic:** The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's product development strategy regarding deployment risks, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic.	**Publishers' Objections:** Yellow highlighted portion at ¶¶ 86 disclosing generic and high-level information about the presence of Publishers' lyrics in Anthropic's training datasets from crawling behavior does not constitute confidential information and disclosure of such information would not cause

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			The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about Anthropic's training data, such as the number of times particular pieces of data appear within the training data, the weight assigned to particular categories of data during training, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information, including the amount of content included within the guardrails and the dates Anthropic implemented or adjusted guardrails, would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this	commercial or privacy harm.

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
687-21	Ex. 19 – Expert Reply Report of Jeffrey Bilmes, Ph.D.	**Anthropic**: Yellow highlighted portions at pp. 9, 58, 60-61, 63-64,73, 78, 80, 84-85, 100, 106-107, 111-115, 119-125, 128-134, 140-144, 146-156, 160-161, 163-175, 178, 186.	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about Anthropic's training data, such as the volume of training data, specific number of tokens used to train various Claude models, data acquisition strategy, the number of times particular pieces of data appear within the training data with or without CMI, confidential details regarding Anthropic's crawling efforts, detailed descriptions of Anthropic's deduplication methods, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the operation of Claude. The release	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			of this information, including whether and when models are deprecated internally could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models, harming Anthropic. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information, including the cost of the guardrails, amount of content included within the guardrails, the dates Anthropic implemented or adjusted guardrails, the specific technical thresholds used in the guardrails, detailed descriptions of the technical implementation of the guardrails and its source code, would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			The highlighted portions of the document contain confidential non-public information relating to Anthropic's business practices and operations, including specific and sensitive metrics related to Claude usage, public disclosure of which would cause competitive harm to Anthropic. The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal technical operations, including specific and sensitive details about the internal data storage locations on Anthropic's servers and the datasets stored at those locations, public disclosure of which would harm Anthropic's ability to maintain proper security over its data by providing bad actors with the information needed to attempt to access those locations.	
687-22	Ex. 20 – Reply Expert Report of Dr. Andrew Bray	**Anthropic:** Yellow highlighted portions at Table of Contents, pp. 3, 23, 32, 33	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the implementation technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information, including, e.g., the amount of content included, would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
687-23	Ex. 21 – Expert Reply Report & Supplemental Report of Joshua W. Dennis	**Anthropic:** Yellow highlighted portions at pp. 7-8, 11, 104-106, 108, 119-120	**Anthropic:** The highlighted portions of the document contain confidential non-public information relating to Anthropic's business practices and operations, including specific and sensitive metrics related to Claude usage, public disclosure of which would cause competitive harm to Anthropic.	
687-24	Ex. 22 – Exhibit 8 to the Expert Reply Report and Supplemental Report of Joshua W. Dennis	**Anthropic:** Entire document	**Anthropic:** The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, including specific information regarding Anthropic's finances, including data related to the billing tied to specific customer accounts, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic.	
687-25	Ex. 23 – Expert Reply Report of Abhishek	**Publishers:** Blue highlighted portions at ¶¶ 17 & nn. 34, 35, 37, 38; n. 52; ¶	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information concerning Publisher licensing agreements, comprising licensing terms with	**Publishers' Objections:** Yellow highlighted portions at ¶ 63 & n.148: The

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
	Nagaraj, Ph.D.	38; ¶ 81-82 & nn.205-206. **Anthropic:** Yellow highlighted portions at ¶¶ 30 n.53; 49 n.103; 60 n.136, 139; 62 & n. 147; 63 & nn.148, 149, 151, 64, 65, 67 & nn.166, 167; 71 n.174; 89 n.235; 90 n.241; 97, 108, 109 n.292; 114, 120, 123 & n. 317; 124, 126, 136, 137, 140, 142, 151, 152, 153, 154, 155, 156, 164, 165	non-party, scope of rights conferred, as well as information about Publisher business strategies regarding licensing. Public disclosure of this information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers. **Anthropic:** The highlighted portions of the document contain confidential information about a licensing agreement between Anthropic and a non-party, revealing non-public details about the identity of an Anthropic partner who is not party to this litigation and who has a reasonable expectation that Anthropic will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. This text also reveals confidential, non-public information about the terms and conditions of the agreement, including pricing and business strategy. The disclosure of this non-public information is likely to result in competitive harm to Anthropic, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Anthropic.	general fact that Anthropic has entered into a licensing deal for lyrics is not commercially sensitive information and is a matter of public concern. Additionally, Anthropic's competitors, including Google and OpenAI, make the fact of their licensing deals public. Yellow highlighted portions at ¶ 67 nn.166-167: Anthropic's policy concerning communications to rightsholders regarding their works is a matter of public concern, especially to the rightsholders affected, nor does Anthropic have a privacy interest in others' copyrighted works. Disclosure of such information would not cause commercial or privacy harm.

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's data acquisition strategy and product development strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about sources of training dataset mixes and methods to obtain that data including the number of tokens used to train Claude, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
687-26	Ex. 24 – Reply Report of	**Anthropic:** Yellow highlighted portion at pp. 2,	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
	Dr. Shawn Shan	4-8, 10-14, App'x p.2.	information relating to Anthropic's internal technical operations, including specific and sensitive details about Anthropic's training data, such as the number of times particular pieces of data appear within the training data, the names and descriptions of contents of training data files, and the weight assigned to categories of data during training, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information, including the amount of content included within the guardrails, the dates when guardrails were implemented or adjusted, detailed descriptions of the technical implementation of the guardrails and the source code, would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
687-27	Ex. 25 – Expert Reply Opinion of Professor Michael D. Smith	**Publishers:** Blue highlighted portions at ¶ 45; ¶ 110; ¶ 154 & n.112; ¶ 156 & n.113. **Anthropic:** Yellow highlighted portions at ¶¶ 10 & n.11; 87, 88, 89 & n.85; 102, 161, 162, 163	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information concerning licensing agreement terms, including the scope of rights conferred. Discloses financial information, including trade secrets, comprising Publisher revenue trends and analysis. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers. **Anthropic:** The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's finances and data acquisition strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their	**Publishers' Objections:** **Publishers' Objections:** Yellow highlighted portions at ¶¶ 10, 87–88: Anthropic's entering into (or not entering into) agreements constitutes generic and stale information that does not implicate any privacy interest. Anthropic's policy concerning communications to rightsholders regarding their works is a matter of public concern, especially to the rightsholders affected, nor does Anthropic have a privacy interest in others' copyrighted works. Disclosure of such information would not cause

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			business operations in an effort to compete unfairly against Anthropic.	commercial or privacy harm.
687-31	Ex. 30 – Defendant Anthropic PBC's Amended and Supplemental Responses and Objections to Plaintiffs' First Set of Interrogatories (Nos. 9, 11, 12)	**Anthropic:** Yellow highlighted portions at pp. 12-14	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information, including the amount of content included within the guardrails, the dates Anthropic implemented or adjusted guardrails, and specific technical thresholds used in the guardrails, would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	**Publishers' Objections:** Yellow highlighted portions at 14 regarding the addition of Publishers' lyrics output guardrails are not confidential, form the basis of the instant action, and bear directly on Anthropic's willful infringement of Publishers' lyrics. This fact has also been publicly disclosed by Anthropic. ECF No. 801-1 at 23. Disclosure of this fact would not threaten commercial or privacy harms.
687-39	Ex. 54 – Anthropic_00002169887	**Anthropic:** Entire Document	**Anthropic:** The document contains highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's finances, data acquisition strategy, commercialization strategy, and product development strategy, public disclosure of which would cause	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic. The document contains highly confidential non-public information relating to Anthropic's views of its competitors in various product markets. Disclosure of this non-public information is likely to result in competitive harm to Anthropic, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Anthropic. The document contains highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about sources of training dataset mixes and methods to obtain that data, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
687-40	Ex. 55 – Anthropic_0000228080	**Anthropic:** Yellow highlighted portions at pp. 3-4, 7	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			sensitive details about sources of training dataset mixes and Anthropic's analysis of the value of that data, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
687-41	Ex. 56 – Anthropic_000023122 6	**Anthropic:** Entire document	**Anthropic:** The document contains highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about sources of training dataset mixes, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
687-47	Ex. 66 – Anthropic_000045842 7	**Anthropic:** Entire document	**Anthropic:** This document contains highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's commercialization strategy and product development strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			compete unfairly against Anthropic. The document contains highly confidential non-public information relating to Anthropic's views of its competitors in various product markets. Disclosure of this non-public information is likely to result in competitive harm to Anthropic, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Anthropic.	
687-48	Ex. 67 – Anthropic_ 0000458491	**Anthropic:** Entire Document	**Anthropic:** The document contains highly confidential non-public information relating to Anthropic's views of its competitors and technical testing related to the same. Disclosure of this non-public information is likely to result in competitive harm to Anthropic, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Anthropic. The document also contains highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the training methods and development of Claude. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			by Anthropic's competitors in training their generative AI models, harming Anthropic.	
687-49	Ex. 68 – Anthropic_000045916 2	**Anthropic:** Yellow highlighted portions at pgs 3-7, 13-14	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about source code, internal tooling, and software architecture Anthropic uses to develop, train, and evaluate its models, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal technical operations, including specific and sensitive details about the internal data storage locations on Anthropic's servers and the datasets stored at those locations, public disclosure of which would harm Anthropic's ability to maintain proper security over its data by providing bad actors with the information needed to attempt to access those locations	
687-50	Ex. 69 – Anthropic_000045924 9	**Anthropic:** Yellow highlighted portions at pp.	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
		2, 5, 6, 8-23, 25, 29-44	operations, including specific and sensitive details about source code, internal tooling, and software architecture Anthropic uses to develop, train, and evaluate its models, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain personally identifiable information of Anthropic's employees. This text should be sealed because it reveals personally identifiable information of Anthropic's employees, who have a legitimate, legally recognized privacy interest in protecting their contact information from public disclosure. If their contact information were to be publicly disclosed, they may be subject to repeated inquiries from the press or members of the general public, which could rise to the level of threats or harassment, given the current media attention on Anthropic. See, e.g., *Benedict v. Hewlett-Packard Co.*, 2014 WL 233827, at *3 (N.D. Cal. Jan. 21, 2014) (granting motion to seal personal information, including a home address, phone number, and email address).	
687-51	Ex. 70 – Anthropic_	**Anthropic:** Yellow highlighted	**Anthropic:** The highlighted portion(s) of the document contain(s) highly confidential	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
	0000459415	portions at pp. 11, 15-20, 29	nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about sources of the source code, internal tooling, internal model identifiers, and software architecture Anthropic uses to develop, train, and evaluate its models, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portion(s) of the document contain(s) personally identifiable information of Anthropic's employees. This text should be sealed because it reveals personally identifiable information of Anthropic's employees, who have a legitimate, legally recognized privacy interest in protecting their contact information from public disclosure. If their contact information were to be publicly disclosed, they may be subject to repeated inquiries from the press or members of the general public, which could rise to the level of threats or harassment, given the current media attention on Anthropic. See, e.g., Benedict v. Hewlett-Packard Co., 2014 WL 233827, at *3 (N.D. Cal. Jan. 21, 2014) (granting motion to seal personal information, including a home address, phone number, and email address).	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
687-52	Ex. 71 – Anthropic_000045948 7	**Anthropic:** Yellow highlighted portions at pp. 7, 11	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the internal model identifiers and software architecture Anthropic uses to develop, train, and evaluate its models, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
687-53	Ex. 72 – Anthropic_000045954 3	**Anthropic:** Yellow highlighted portions at pp. 2–20, 24-36, 38-62, 68-102, 107-109, 113-120, 122-123, 127-147, 151-203, 206-217, 224, 226-230, 232-236, 238, 240, 243, 245–246, 250-251, 254, 256, 258, 260, 262, 264, 266, 269, 272	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the source code, internal tooling, internal model identifiers, and software architecture Anthropic uses to develop, train, and evaluate its models, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
687-54	Ex. 73 – Anthropic_000050775 0	**Anthropic:** Yellow highlighted	**Anthropic:** The highlighted portions of the document contain highly confidential non-public	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
		portions throughout.	information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's commercialization strategy and product development strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic. The highlighted portions of the document also contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the operation, training methods, and development of Claude. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models, harming Anthropic.	
687-55	Ex. 74 – Anthropic_00005259 47	**Anthropic:** Yellow highlighted portions at pg 7	**Anthropic:** The highlighted portion of the document contains highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about internal model identifiers and software architecture Anthropic uses to develop, train, and evaluate its models, public disclosure of which would cause competitive	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
687-56	Ex. 75 – Anthropic_0000526003	**Anthropic:** Yellow highlighted portions at pp. 2, 7, 9-10, 13, 15, 20, 24	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about source code, internal tooling, and software architecture Anthropic uses to develop, train, and evaluate its models, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain personally identifiable information of Anthropic's employees. This text should be sealed because it reveals personally identifiable information of Anthropic's employees, who have a legitimate, legally recognized privacy interest in protecting their contact information from public disclosure. If their contact information were to be publicly disclosed, they may be subject to repeated inquiries from the press or members of the general public,	

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			which could rise to the level of threats or harassment, given the current media attention on Anthropic. See, e.g., *Benedict v. Hewlett-Packard Co.*, 2014 WL 233827, at *3 (N.D. Cal. Jan. 21, 2014) (granting motion to seal personal information, including a home address, phone number, and email address).	
687-57	Ex. 76 – Anthropic_000052790 3	**Anthropic:** Yellow highlighted portions at pp. 3, 10-11, 13, 18, 23-26	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the source code, internal tooling, internal model identifiers, and software architecture Anthropic uses to develop, train, and evaluate its models, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
687-59	Ex. 78 – Anthropic_000055436 6	**Anthropic:** Yellow highlighted portions at pp. 17-19, 21-23	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about source code, internal tooling, and software architecture Anthropic uses to develop, train, and evaluate its models, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portion of the document contains highly confidential non-public information relating to Anthropic's internal technical operations, including specific and sensitive details about the internal data storage locations on Anthropic's servers and the datasets stored at those locations, public disclosure of which would harm Anthropic's ability to maintain proper security over its data by providing bad actors with the information needed to attempt to access those locations.	
687-60	Ex. 79 – Anthropic_ 000055498 0	**Anthropic:** Yellow highlighted portions at pp. 1-13	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the source code, internal tooling, internal model identifiers, and software architecture Anthropic uses to develop, train, and evaluate its models, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
687-61	Ex. 80 – Anthropic_0000557015	**Anthropic:** Yellow highlighted portion at pp. 6-9, 15, 17-19, 21, 30-31	**Anthropic:** The highlighted portion(s) of the document contain(s) highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details source code, internal tooling, internal model identifiers, and software architecture Anthropic uses to develop, train, and evaluate its models, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
687-62	Ex. 81 – Anthropic_0000557304	**Anthropic:** Yellow highlighted portions at pp. 2-3, 5-7, 11-56	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the source code, internal tooling, internal model identifiers, and software architecture Anthropic uses to develop, train, and evaluate its models, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
687-63	Ex. 82 – Anthropic_	**Anthropic:**	**Anthropic:**	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
	0000557359	Yellow highlighted portion at pps. 1, 69, 79, 86, 94, 95, 110, 112, 123, 185, 200, 225-26, 231, 242-44, 246-255, 257-263, 265-275, 277-279, 282-296, 300-330, 334-341	The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about source code and internal model identifiers, Anthropic uses to develop, train, and evaluate its models, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
687-76	Ex. 104 – Excerpts of the Deposition of Duff Berschback	**Publishers:** Blue highlighted portions at 29:1–32:25; 73:1–75:5; 123:17–124:25; 141:1–144:25; 165:1–168:24; 249:1–250:19; 252:5–256:4; blue highlighted portions at 12-13 (errata pages).	**Publishers:** Discloses confidential and non-public details about Publisher licensing practices, business strategies, the scope of rights typically granted to licensees, terms of various confidential agreements, confidential discussions with licensing counterparties and potential counterparties, and communications practices with songwriters. Discloses highly confidential, non-public, and commercially sensitive information concerning Publishers' enforcement practices and investigations into infringement. Public disclosure of this commercially sensitive information would cause harm to Publishers, including but not limited to harms from market	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers. Public disclosure of this information would cause harm to Publishers arising from potential infringers seeking to avoid detection of potential or ongoing infringement of Publishers' copyrights.	
687-77	Ex. 106 – Excerpts of the Deposition of Thomas B. Brown, Jr.	**Anthropic:** Yellow highlighted portions at pg. 6 (exhibit list); 8:21.	**Anthropic:** The highlighted portions of the document contain personally identifiable information of Anthropic's employees. This text should be sealed because it reveals personally identifiable information of Anthropic's employees, who have a legitimate, legally recognized privacy interest in protecting their contact information from public disclosure. If their contact information were to be publicly disclosed, they may be subject to repeated inquiries from the press or members of the general public, which could rise to the level of threats or harassment, given the current media attention on Anthropic. See, e.g., *Benedict v. Hewlett-Packard Co.*, 2014 WL 233827, at *3 (N.D. Cal. Jan. 21, 2014) (granting motion to seal personal information, including a home address, phone number, and email address).	
687-80	Ex. 110 – Excerpts of the Deposition	**Publishers:** Blue highlighted portions at 49:1-14; 50:13-	**Publishers:** Discloses confidential and non-public details about Publisher licensing practices, business strategies, the scope of rights	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
	of Alisa Coleman	15; 51:13-24; 52:1-24; 78:4-8; 79:12–80:19; 93:7–99:13; 118:21–120:25; 181:1–184:5; 219:19–220:25.	typically granted to licensees, terms of various confidential agreements, confidential discussions with licensing counterparties and potential counterparties, and communications practices with songwriters. Discloses highly confidential, non-public, and commercially sensitive information concerning Publishers' enforcement practices and investigations into infringement. Public disclosure of this commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers. Public disclosure of this information would cause harm to Publishers arising from potential infringers seeking to avoid detection of potential or ongoing infringement of Publishers' copyrights.	
687-82	Ex. 112 – Excerpts of the Deposition of Dario Amodei	**Anthropic:** Yellow highlighted portions at pp. 16:12-17, 37:21-38:9, 38:18-20, 44:10-12.	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the functionality of Anthropic's content guardrails and defense systems and where in the development process such systems are deployed. If publicly	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models, harming Anthropic. The highlighted portion(s) of the document contain(s) highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's product development strategy and risk considerations with respect to launching new products, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic.	
687-84	Ex. 116 – Excerpts of the Deposition of Dawn Drain	**Anthropic:** Yellow highlighted portions at 4:16; 8:9; 154:5-9; 154:13-155:5; 155:7-9; 155:11-12; 155:15-20; 155:24-156:21; 156:23-25; 177:2-18; 177:20-178:2; 178:4; 178:6-9; 178:11-15; 178:17-179:4; 179:9-180:25	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about sources of creation of training dataset mixes, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			The highlighted portions of the document contain personally identifiable information of Anthropic's employees. This text should be sealed because it reveals personally identifiable information of Anthropic's employees, who have a legitimate, legally recognized privacy interest in protecting their contact information from public disclosure. If their contact information were to be publicly disclosed, they may be subject to repeated inquiries from the press or members of the general public, which could rise to the level of threats or harassment, given the current media attention on Anthropic. See, e.g., *Benedict v. Hewlett-Packard Co.*, 2014 WL 233827, at *3 (N.D. Cal. Jan. 21, 2014) (granting motion to seal personal information, including a home address, phone number, and email address).	
687-85	Ex. 117 – Excerpts of the Deposition of Kent Draughon	**Publishers:** Blue highlighted portions at 11:23; 49:1-19; 50:13–51:18; 52:7-25; 59:3–60:25; 105:1-9; 106:2-9; 122:1–124:25; 135:13–137:9; 137:25–140:25; 153:1–154:19; 156:8-25.	**Publishers:** Discloses confidential and non-public details about Publisher licensing practices, business strategies, the scope of rights typically granted to licensees, terms of various confidential agreements, confidential discussions with licensing counterparties and potential counterparties, and communications practices with songwriters. Discloses highly confidential, non-public, and commercially sensitive information concerning Publishers' enforcement practices and investigations into infringement.	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			Public disclosure of this commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers. Public disclosure of this information would cause harm to Publishers arising from potential infringers seeking to avoid detection of potential or ongoing infringement of Publishers' copyrights.	
687-87	Ex. 119 – Excerpts of the 30(b)(6) Deposition of Deep Ganguli	**Anthropic:** Yellow highlighted portion at 8:10	**Anthropic:** The highlighted portion of the document contains personally identifiable information of Anthropic's employees. This text should be sealed because it reveals personally identifiable information of Anthropic's employees, who have a legitimate, legally recognized privacy interest in protecting their contact information from public disclosure. If their contact information were to be publicly disclosed, they may be subject to repeated inquiries from the press or members of the general public, which could rise to the level of threats or harassment, given the current media attention on Anthropic. See, e.g., *Benedict v. Hewlett-Packard Co.*, 2014 WL 233827, at *3 (N.D. Cal. Jan. 21, 2014) (granting motion to seal personal information, including a	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			home address, phone number, and email address).	
687-88	Ex. 120 – Excerpts of the Deposition of Jared Kaplan	**Anthropic:** Yellow highlighted portions at 12:16.	**Anthropic:** The highlighted portion of the document contains personally identifiable information of Anthropic's employees. This text should be sealed because it reveals personally identifiable information of Anthropic's employees, who have a legitimate, legally recognized privacy interest in protecting their contact information from public disclosure. If their contact information were to be publicly disclosed, they may be subject to repeated inquiries from the press or members of the general public, which could rise to the level of threats or harassment, given the current media attention on Anthropic. See, e.g., *Benedict v. Hewlett-Packard Co.*, 2014 WL 233827, at *3 (N.D. Cal. Jan. 21, 2014) (granting motion to seal personal information, including a home address, phone number, and email address).	
687-89	Ex. 121 – Excerpts of the Deposition of David Kokakis	**Publishers:** Blue highlighted portions at 32:23–36:25; 85:1–88:24; 126:10–128:2; 131:20–133:16; 152:12–153:2; 253:1-5; 254:12–256:2; 293:1–295:3; 333:1–335:20; 339:4-13.	**Publishers:** Discloses confidential and non-public details about Publisher licensing practices, business strategies, the scope of rights typically granted to licensees, terms of various confidential agreements, confidential discussions with licensing counterparties and potential counterparties, and communications practices with songwriters. Discloses highly confidential, non-public, and commercially sensitive information concerning	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			Publishers' enforcement practices and investigations into infringement. Public disclosure of this commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers. Public disclosure of this information would cause harm to Publishers arising from potential infringers seeking to avoid detection of potential or ongoing infringement of Publishers' copyrights.	
687-92	Ex. 124 – Excerpts of the 30(b)(1) Deposition of Ben Mann Volume 1	**Anthropic:** Yellow highlighted portions at 3:16; 4:2-3; 4:16, 4:20; 73:2-3, 7, 73:25-74:3, 74:11; 76:16-20; 80:8-16, 81:17-25, 82:3-4, 9-10, 12; 97:1-4, 6-7, 97:9-98:8, 98:11-13, 16-19, 98:22-99:6, 99:8-10, 12-13, 19-23, 100:4, 7-10, 13-18	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about sources of training dataset mixes, the number of tokens, model code names, and methods to obtain data, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain highly confidential nonpublic	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			information relating to Anthropic's internal technical operations, internal technical operations, including specific and sensitive details about the operation, training methods, and development of Claude. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models, harming Anthropic. The highlighted portions of the document contain personally identifiable information of Anthropic's employees. This text should be sealed because it reveals personally identifiable information of Anthropic's employees, who have a legitimate, legally recognized privacy interest in protecting their contact information from public disclosure. If their contact information were to be publicly disclosed, they may be subject to repeated inquiries from the press or members of the general public, which could rise to the level of threats or harassment, given the current media attention on Anthropic. *See, e.g.*, *Benedict v. Hewlett-Packard Co.*, 2014 WL 233827, at *3 (N.D. Cal. Jan. 21, 2014) (granting motion to seal personal information, including a home address, phone number, and email address).	
687-93	Ex. 125 – Excerpts of the 30(b)(1) Deposition	**Anthropic:** Yellow highlighted	**Anthropic:** The highlighted portion of the document contains personally identifiable information of Anthropic's	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
	of Ben Mann Volume 2	portions at 148:14	employees. This text should be sealed because it reveals personally identifiable information of Anthropic's employees, who have a legitimate, legally recognized privacy interest in protecting their contact information from public disclosure. If their contact information were to be publicly disclosed, they may be subject to repeated inquiries from the press or members of the general public, which could rise to the level of threats or harassment, given the current media attention on Anthropic. *See, e.g.*, *Benedict v. Hewlett-Packard Co.*, 2014 WL 233827, at *3 (N.D. Cal. Jan. 21, 2014) (granting motion to seal personal information, including a home address, phone number, and email address).	
687-94	Ex. 126 – Excerpts of the 30(b)(6) Deposition of Ben Mann	**Anthropic:** Yellow highlighted portions at 30: 5-18, 31:1-10, 17-20, 24-25, 32:2-4, 18-20; 57:2-4, 16-21, 58-1-4, 59:16-18, 87:18-20; 105:1—3, 6-9, 11-14, 17-23, 106:5-7, 113:21-114:3	**Anthropic**: The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's data acquisition and use authorization strategy and product development strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic.	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about sources of training dataset mixes and methods to obtain that data, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
687-95	Ex. 128 – Excerpts of the 30(b)(1) Deposition of Vinay Rao	**Anthropic:** Yellow highlighted portions at 33:2-3, 6-8, 16-19, 34:7-14, 17-18, 35:1-3, 20, 24, 36:16, 20, errata (pg. 6 PDF).	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the operation and development of Claude, including its content guardrails and defense systems. The release of this information, including details about the cost of guardrails, guardrail features, how guardrails are deployed across various products, and areas for future improvements, would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			training their generative AI models, harming Anthropic. The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's Trust & Safety strategy and allocation of resources within its Trust & Safety department, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic.	
687-96	Ex. 129 – Excerpts of the 30(b)(6) Deposition of Vinay Rao	**Anthropic:** Yellow highlighted portions at pg. 5 (exhibit list)	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information, including the internal code name for a confidential guardrail development project, could enable competitors to piece together Anthropic's development methods from references to the project, which in turn could influence the competitive decision-making and business strategies employed by	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			Anthropic's competitors in training their generative AI models.	
687-97	Ex. 130 – Excerpts of the Deposition of Pranay Sangani	**Anthropic:** Yellow highlighted portions at 118:1-4; 118:6-10; 118:12-17; 119:10-24; 120:1-13; 120:16-23	**Anthropic:** The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's data acquisition strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about sources of training dataset mixes, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
687-98	Ex. 131 – Excerpts of the Deposition of Shawn Shan	**Anthropic:** Yellow highlighted portion at pp. 232:24-25; 300:2; 313:16,	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and	

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		314:9; errata (pg. 21 of PDF)	sensitive details about Anthropic's training data, such as the names of training data files, the number of times particular pieces of data appear within the training data with CMI, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information, including the amount of content included within the guardrails, would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
687-99	Ex. 132 – Excerpts of the	**Publishers:** Blue highlighted	**Publishers:** Discloses confidential and non-public details about Publisher	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
	Deposition of Michael Smith Volume 1	portions at 273:20–278:20; 297:4-9; 321:1–323:2. **Anthropic:** Yellow highlighted portions at 76:18; 76:22-23	licensing practices, revenues, financial information, including trade secrets, comprising payment and royalty structures, and confidential discussions with licensing counterparties. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers. **Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about sources of training dataset mixes, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
687-102	Ex. 138 – Excerpts of the 30(b)(6) Deposition of Thomas Turvey	**Anthropic:** Yellow highlighted portion at 107:15-108:6	**Anthropic:** The highlighted portion of the document contains highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's data acquisition strategy, public disclosure of	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic.	
Publishers' Opposition to Motion to Exclude the Expert Testimony and Opinions of Michael D. Smith (ECF No. 739 *et seq.*)				
739	Publishers' Opposition to Motion to Exclude the Expert Testimony and Opinions of Michael D. Smith	**Anthropic:** Yellow highlighted portions at p. 10	**Anthropic:** The highlighted portion of the document contains highly confidential non-public information relating to Anthropic's views of its competitors in various product markets. Disclosure of this non-public information is likely to result in competitive harm to Anthropic, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Anthropic.	
Anthropic's Opposition to Publishers' Motion in Limine to Exclude the Opinions of Dr. Russ Altman (ECF No. 747 *et seq.*)				
747-1	Ex. 1 – Excerpts of the Deposition of Shawn Shan	**Anthropic**: Yellow highlighted portions at p. 232:24-25; errata (pg. 8 of PDF)	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about Anthropic's training data, such as the date range of datasets Anthropic acquired for training, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			training their generative AI models. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information, including the amount of content included within the guardrails, would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
747-2	Ex. 3 – Excerpts of the Expert Report of Jeffrey Bilmes, Ph.D.	**Anthropic:** Yellow highlighted portions at pg. 201-202.	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about Anthropic's training data, such as the volume of training data, specific number of tokens used to train various Claude models, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed,	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
747-5	Ex. 6 – Excerpts of the 30(b)(1) Deposition of Deep Ganguli	**Anthropic:** Yellow highlighted portions at 85:24-87:21; 88:6-15	**Anthropic:** The highlighted portions of the document contain personal financial information of Anthropic's employees. This text should be sealed because the personal financial information of non-party Anthropic employees is not relevant to any issue in the case, and Anthropic employees have a legitimate privacy interest in protecting their personal financial information from public disclosure.	
Anthropic's Opposition to Publishers' Motion in Limine to Exclude the Opinions of Dr. Jeffrey Bilmes (ECF No. 749 *et seq*.)				
749	Anthropic's Opposition to Publishers' Motion in Limine to Exclude the Opinions of Dr. Jeffrey Bilmes	**Anthropic:** Yellow highlighted portions at pp. 5, 10	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the number of copies of works in suit left in training data post-Anthropic's deduplication processes, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain highly confidential nonpublic	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			information relating to Anthropic's internal technical operations, including specific and sensitive details about the technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information, including details of how Anthropic's guardrails are executed across various product surfaces, could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
749-4	Ex. 6 – Excerpts of the Reply Expert Report of Dr. Ben Zhao	**Anthropic:** Yellow highlighted portions at p. 35.	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about Anthropic's training data, such as detailed descriptions of Anthropic's deduplication processes, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
749-8	Ex. 10 – Excerpts of the Reply Report of Dr. Shawn Shan	**Anthropic:** Yellow highlighted portions at p. 5	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			Anthropic's training data, such as the number of times particular pieces of data appear within the training data, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
749-9	Ex. 11 – Excerpts of the 30(b)(6) Deposition of Ben Mann	**Anthropic:** Yellow highlighted portions at 204:6-22	**Anthropic**: The highlighted portion of the document contains confidential information about a commercial agreement between Anthropic and a non-party, revealing non-public details about the identity of an Anthropic partner who is not party to this litigation and who has a reasonable expectation that Anthropic will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. The disclosure of this non-public information is likely to result in competitive harm to Anthropic, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Anthropic. The highlighted portions of the document contain confidential information about a licensing agreement between Anthropic and a non-party, revealing non-public details about the identity of an Anthropic partner who is not	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			party to this litigation and who has a reasonable expectation that Anthropic will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. This text also reveals confidential, non-public information about the terms and conditions of the agreement, including pricing and business strategy. The disclosure of this non-public information is likely to result in competitive harm to Anthropic, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Anthropic. The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's data acquisition strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic.	
Anthropic's Opposition to Publishers' Motion in Limine to Partially Exclude the Opinions of Dr. Andrew Bray (ECF No. 751 *et seq.*)				
751	Anthropic's Opposition to Publishers'	**Anthropic:** Yellow highlighted	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
	Motion in Limine to Partially Exclude the Opinions of Dr. Andrew Bray	portions at pp. 3, 10	Anthropic's internal technical operations, including specific and sensitive details about the implementation technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information, including, e.g., the amount of content included, would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
751-1	Ex. 1 – Reply Expert Report of Dr. Andrew Bray	**Anthropic:** Yellow highlighted portions at Table of Contents, pp. 3, 23, 32, 33	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the implementation technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information, including, e.g., the amount of content included, would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			by Anthropic's competitors in training their generative AI models.	
Anthropic's Opposition to Publishers' Motion in Limine to Partially Exclude the Opinions of Dr. Abhishek Nagaraj (ECF No. 753 *et seq*.)				
753	Anthropic's Opposition to Publishers' Motion in Limine to Partially Exclude the Opinions of Dr. Abhishek Nagaraj	**Anthropic:** Yellow highlighted portions at pp. 3, 5, 8	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about sources of training dataset mixes and methods to obtain that data, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
753-1	Ex. 2 – Expert Reply Report of Abhishek Nagaraj, Ph.D.	**Publishers:** Blue highlighted portions at ¶¶ 17 & nn. 34, 35, 37, 38; n. 52; ¶ 38; ¶¶ 81-82 & nn. 205-206. **Anthropic:** Yellow highlighted portions at ¶¶ 30 n.53; 49 n.103; 60 n.136, 139; 62, 63 & nn.147, 148; 149, 151; 64, 65; 67 & nn.166, 167; 71 n.174; 89 n.235; 89 n.235; 90	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information concerning Publisher licensing agreements, comprising licensing terms with non-party, scope of rights conferred, as well as information about Publisher business strategies regarding licensing. Public disclosure of this information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers. **Anthropic:** The highlighted portions of the document contain	**Publishers' Objections:** Yellow highlighted portions at ¶ 63 & n.148: The general fact that Anthropic has entered into a licensing deal for lyrics is not commercially sensitive information and is a matter of public concern. Additionally, Anthropic's competitors, including Google and OpenAI, make the fact of

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
		n.241; 97, 108, n.292, 114, 120, 123 & n.317; 124, 126, 136, 137, 140, 142, 151, 152, 153, 154, 155, 156, 164, 165	confidential information about a licensing agreement between Anthropic and a non-party, revealing non-public details about the identity of an Anthropic partner who is not party to this litigation and who has a reasonable expectation that Anthropic will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. This text also reveals confidential, non-public information about the terms and conditions of the agreement, including pricing and business strategy. The disclosure of this non-public information is likely to result in competitive harm to Anthropic, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Anthropic. The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's data acquisition strategy and product development strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to	their licensing deals public. Yellow highlighted portions at ¶ 67 nn.166-167: Anthropic's policy concerning communications to rightsholders regarding their works is a matter of public concern, especially to the rightsholders affected, nor does Anthropic have a privacy interest in others' copyrighted works. Disclosure of such information would not cause commercial or privacy harm.

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			compete unfairly against Anthropic. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about sources of training dataset mixes and methods to obtain that data including the number of tokens used to train Claude, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portion of the document contains confidential non-public information relating to Anthropic's business practices and operations, including specific and sensitive metrics related to Claude usage, public disclosure of which would cause competitive harm to Anthropic. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information would harm	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
753-2	Ex. 3 – Excerpts of the Expert Report of Professor Michael D. Smith	**Publishers:** Blue highlighted portions at ¶¶ 93 & nn.79-80; ¶¶ 98 & n.84. **Anthropic:** Yellow highlighted portions at ¶¶ 105, 106	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information concerning licensing agreement terms, including the scope of rights conferred, and discussions with potential licensees, including AI companies. Discloses financial information, including trade secrets, comprising fee structures and royalty payments. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers. **Anthropic:** The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's	**Publishers' Objections:** Yellow highlighted portions at ¶¶ 105, 106 constitute generic information about Anthropic policies and no privacy interest is implicated; disclosure does not threaten any harm.

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			data acquisition strategy and product development strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic.	
753-3	Ex. 4 – Excerpts of the Deposition of Ben Mann	**Anthropic:** Yellow highlighted portions at 113:21-114:3	**Anthropic**: The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about sources of training dataset mixes and methods to obtain that data, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
753-4	Ex. 5 – Excerpts of the Deposition of Jared Kaplan	**Anthropic:** Yellow highlighted portion at 12:15	**Anthropic:** The highlighted portion of the document contains personally identifiable information of Anthropic's employees. This text should be sealed because it reveals personally identifiable information of Anthropic's employees, who have a legitimate, legally recognized privacy interest in protecting their contact information from public disclosure. If their contact information were to be publicly disclosed, they may be subject to repeated inquiries from the press	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			or members of the general public, which could rise to the level of threats or harassment, given the current media attention on Anthropic. See, e.g., *Benedict v. Hewlett-Packard Co.*, 2014 WL 233827, at *3 (N.D. Cal. Jan. 21, 2014) (granting motion to seal personal information, including a home address, phone number, and email address).	
Anthropic's Opposition to Publishers' Motion to Exclude Expert Testimony of Colin Stokes (ECF No. 741-1 *et seq*.)				
741-1	Ex. 3 – Excerpts of the Deposition of Duff Berschback	**Publishers:** Blue highlighted portions at 6–7 (errata pages).	**Publishers:** Discloses confidential and non-public information concerning Publishers' internal business practices. Public disclosure of this commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
741-4	Ex. 7 – Excerpts of the Deposition of David Kokakis	**Publishers:** Blue highlighted portions at 339:4-13.	**Publishers:** Discloses confidential and non-public details about Publisher business strategies and plans regarding the use of AI. Public disclosure of this commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
Anthropic's Opposition to Motion in Limine to Exclude the Opinions of Dr. Ethan Lustig (ECF No. 742-3 *et seq.*)				
743-3	Ex. 4 – Excerpts of the Deposition of Kent Draughon	**Publishers:** Blue highlighted portions at 11:22-23; 49:1-19; 50:13–51:18; 52:7-25.	**Publishers:** Discloses confidential and non-public personally identifiable information, internal business practices and strategies, the scope of lyrics-display licenses, and copyright-management strategies. Discloses address of deponent's personal abode that is not relevant to the instant action. Disclosure of the personally identifiable information would cause privacy harm. Public disclosure of this commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers. Disclosure of the personally identifiable information would also cause significant privacy harm to the individual concerned.	
743-4	Ex. 5 – Excerpts of the Deposition of Alisa Coleman	**Publishers:** Blue highlighted portions 53:24–54:24; 56:16-25.	**Publishers:** Discloses confidential and non-public information concerning Publishers' copyright-management practices. Discloses highly confidential, non-public, and commercially sensitive information concerning Publishers' enforcement practices and investigations into infringement. Public disclosure of this information would cause harm to Publishers arising from potential	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			infringers seeking to avoid detection of potential or ongoing infringement of Publishers' copyrights.	
743-5	Ex. 6 – Excerpts of the Deposition of David Kokakis	**Publishers:** Blue highlighted portions at 85:1–88:24.	**Publishers:** Discloses confidential and non-public details about Publisher business practices and strategies regarding copyright management practices. Public disclosure of this commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
743-8	Ex. 10 – Excerpts of Rebuttal Expert Report of Dr. Ben Zhao	**Anthropic:** Yellow highlighted portion at p. 36	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about Anthropic's training data, such as the number of times particular pieces of data appear within the training data, the weight assigned to particular categories of data during training, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
743-9	Ex. 11 – Excerpts of Rebuttal Expert Report of Dr. Shawn Shan	**Anthropic:** Yellow highlighted portion at p. 14	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information, including descriptions of the technical implementation of the guardrails, would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	**Publishers' Objections:** Yellow highlighted portions substantively reflect information already publicly disclosed. *Bartz*, ECF No. 555-7, at 4–5.
Publishers' Opposition to Anthropic's Motion for Summary Judgment and Reply in Support of Publishers' Motion for Partial Summary Judgment (ECF No. 759 *et seq.*)				
759	Publishers' Opposition to Anthropic's Motion for Summary Judgment and Reply in Support of Publishers' Motion for Partial Summary Judgment	**Publishers:** Blue highlighted portions at p. 25. **Anthropic:** Yellow highlighted portions at pps. 6, 26.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information concerning the terms of licensing agreements. Public disclosure of this commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business	

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			strategies to undercut and unfairly outcompete Publishers. **Anthropic**: The highlighted portion of the document contains highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about sources and volume of data within training dataset mixes and methods to obtain that data, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's data acquisition strategy public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic. The highlighted portions of the document contain highly confidential nonpublic	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			information relating to Anthropic's internal technical operations, internal technical operations, including specific and sensitive details about the operation, training methods, and development of Claude. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models, harming Anthropic. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain personally identifiable information of Anthropic's employees. This text should be sealed because it	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			reveals personally identifiable information of Anthropic's employees, who have a legitimate, legally recognized privacy interest in protecting their contact information from public disclosure. If their contact information were to be publicly disclosed, they may be subject to repeated inquiries from the press or members of the general public, which could rise to the level of threats or harassment, given the current media attention on Anthropic. See, e.g., *Benedict v. Hewlett-Packard Co.*, 2014 WL 233827, at *3 (N.D. Cal. Jan. 21, 2014) (granting motion to seal personal information, including a home address, phone number, and email address).	
759-1	Publishers' Responsive Separate Statement to Anthropic's Moving Separate Statement in Support of its Motion for Summary Judgment	**Publishers:** Blue highlighted portions at pp. 48-50, 63, 66, 84-86. **Anthropic:** Yellow highlighted portions at pp. 3, 14, 16-17, 53-54, 56, 58-59, 72, 74, 76-83, 93-94, 110, 117	**Publishers:** Discloses confidential and non-public information concerning Publishers' copyright registration and management practices, internal business practices, and licensing agreement terms. Discloses highly confidential, non-public, and commercially sensitive information concerning Publishers' enforcement practices and investigations into infringement. Public disclosure of this commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	**Publishers' Objections:** Yellow highlighted portions at pp. 77–78 (Facts ##111-12); 80 (Fact #117); 81 (Fact #119) regarding the strengthening of its output guardrails to address Publishers' lyrics specifically are not confidential, form the basis of the instant action, and bear directly on Anthropic's willful infringement of Publishers' lyrics.

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			Public disclosure of this information would cause harm to Publishers arising from potential infringers seeking to avoid detection of potential or ongoing infringement of Publishers' copyrights. **Anthropic:** The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's data acquisition strategy and product development strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the composition and creation of training dataset mixes, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in	This fact has also been publicly disclosed by Anthropic. ECF No. 801-1 at 23. Disclosure of this fact would not threaten commercial or privacy harms.

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			training their generative AI models. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the operation, training, and development of Claude's content guardrails. The release of this information would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information, including the dates Anthropic instituted its various guardrails, would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain confidential non-public information relating to Anthropic's business practices and operations, including specific and sensitive metrics related to Claude usage, public disclosure of which would cause competitive harm to Anthropic.	
759-2	Publishers' Reply Separate Statement in Support of Motion for Partial Summary Judgment	**Publishers:** Blue highlighted portions at pp. 45-50; 52; 101-102; 117-119; 121-122; 130-131; 134; 136-137; 139-140 **Anthropic:** Yellow highlighted portions at pp. 5-7, 9, 26, 58-62, 64, 69-76, 78, 84-85, 92, 97, 113, 122, 126, 129-30, 133-134, 137	**Publishers:** Discloses confidential and non-public information concerning Publishers' deposit-copy and copyright-management practices, songwriter and licensing agreement terms, and negotiations with third parties. Discloses financial information, including trade secrets, comprising confidential financial data. Discloses highly confidential, non-public, and commercially sensitive information concerning Publishers' enforcement practices and investigations into infringement. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	**Publishers' Objections:** Yellow highlighted portion at p. 62 (Fact 88): The fact that Anthropic added Publishers' Works to their guardrails is not confidential. This fact has also been publicly disclosed by Anthropic. ECF No. 801-1 at 23. Disclosure of this fact would not threaten commercial or privacy harms. Yellow highlighted portion at p. 122 (Fact 212); p. 126 (Ad. F. 23); p.

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			Public disclosure of this information would cause harm to Publishers arising from potential infringers seeking to avoid detection of potential or ongoing infringement of Publishers' copyrights. **Anthropic:** The highlighted portions of the document contain confidential information about a licensing agreement between Anthropic and a non-party, revealing non-public details about the identity of an Anthropic partner who is not party to this litigation and who has a reasonable expectation that Anthropic will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. The disclosure of this non-public information is likely to result in competitive harm to Anthropic, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Anthropic. The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's data acquisition strategy, commercialization strategy, and/or product	129 (Ad. F. 26) to the extent they disclose the existence of Anthropic's licensing counterparty: The fact that Anthropic has entered into a license is not commercially sensitive and bears directly on Anthropic's willful infringement of Publishers' lyrics and its disclosure would not cause commercial or privacy harm; other AI developers, including Anthropic's direct competitors Google and OpenAI, publicize their content licensing deals.

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			development strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic. The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's views of its competitors in various product markets. Disclosure of this non-public information is likely to result in competitive harm to Anthropic, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Anthropic. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the creation of and sources of training dataset mixes, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the operation, training, and development of Claude's content guardrails. The release of this information would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information, including the dates Anthropic instituted its various guardrails, would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain confidential non-public information relating to Anthropic's business practices and operations, including specific and sensitive metrics related to Claude usage, public disclosure of which would cause competitive harm to Anthropic.	
760-1	Ex. 124 – Excerpts of the Deposition of Ben Mann Volume 1	**Anthropic:** Yellow highlighted portions at 62:12-64:21	**Anthropic:** The document contains highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's finances and funding strategy, data acquisition strategy, commercialization strategy, and product development strategy, including specific discussion of nonpublic research strategy and allocation of resources, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic.	
760-2	Ex. 125 – Excerpts of the Deposition of Ben Mann Volume 2	**Anthropic:** Yellow highlighted portions at 3:16 4:2-3, 4:16, 4:20; 81:17-82:12; 103:17-20; 116:11-	**Anthropic**: The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about model code names and training dataset mixes, public disclosure of which would	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
		117:21; 118:9-25; 148:14	cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
760-3	Ex. 126 – Excerpts of the Deposition of Dario Amodei	**Anthropic:** Yellow highlighted portions at pp. 45, 66, 68-70, 72, 128.	**Anthropic:** The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's product development strategy and risk considerations with respect to launching new products, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information, including the amount of content included within the guardrails and the dates Anthropic implemented or adjusted	**Publishers' Objections:** Yellow highlighted portions at 128:3-8; does not reflect confidential information that would result in harm from disclosure, and substantively repeats non-confidential information already disclosed in *Bartz,* and is duplicative of testimony immediately preceding and following the highlighted testimony. The highlighted portions also concern generic conduct that is at the center of this litigation and gives rise to Publishers' claims.

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			guardrails, would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
760-4	Ex. 127 – Excerpts of the Deposition of Daniela Amodei	**Anthropic:** Yellow highlighted portions at pp. 145-148.	**Anthropic:** The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's commercialization strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic	**Publishers' Objections:** Yellow highlighted portions reflect high-level, generic, and stale plans from 2021-2022.
760-5	Ex. 128 – Excerpts of the Deposition of Jared Kaplan	**Anthropic:** Yellow highlighted portions at 45:20; 45:23; 46:2; 138:4-138:11; 138:13-139:2: 154:4-9; 165:1-8; 166:10-19; 201:8-22; 201:24-202:10; 202:12-203:4; 203:6-13;	**Anthropic:** The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's data acquisition strategy and product development strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly	**Publishers' Objections:** Yellow highlighted portions at 165:1-8; 166:10-19 substantively reflect information that has already been publicly disclosed. *See* Second Amended

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
		203:15-22; 203:25-204:10; 204:12-16; 205:1-12; 205:14-206:1; 206:14-25; 207:2-7; 207:9-14; 207:16-19; 207:21-24; 208:1-24; 209:1-24; 210:3-9; 211:5-20; 212:3-7; 212:10-14; 212:18-25; 287:1; 287:3; 287:5; 288:18-19	utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic. The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's views of its competitors in various product markets. Disclosure of this non-public information is likely to result in competitive harm to Anthropic, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Anthropic. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the creation of training dataset mixes, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain personally identifiable information of Anthropic's employees. This text	Complaint at ¶ 73, ECF No. 728.

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			should be sealed because it reveals personally identifiable information of Anthropic's employees, who have a legitimate, legally recognized privacy interest in protecting their contact information from public disclosure. If their contact information were to be publicly disclosed, they may be subject to repeated inquiries from the press or members of the general public, which could rise to the level of threats or harassment, given the current media attention on Anthropic. See, e.g., *Benedict v. Hewlett-Packard Co.*, 2014 WL 233827, at *3 (N.D. Cal. Jan. 21, 2014) (granting motion to seal personal information, including a home address, phone number, and email address).	
760-6	Ex. 129 – Excerpts of the Deposition of Thomas B. Brown, Jr.	**Anthropic:** Yellow highlighted portions at 81:1; 82:1; 302:19-22; 303-308.	**Anthropic:** The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including the name of a potential Anthropic investor, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic. The highlighted portions of the document contain personally identifiable information of Anthropic's employees. This text should be sealed because it	

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			reveals personally identifiable information of Anthropic's employees, who have a legitimate, legally recognized privacy interest in protecting their contact information from public disclosure. If their contact information were to be publicly disclosed, they may be subject to repeated inquiries from the press or members of the general public, which could rise to the level of threats or harassment, given the current media attention on Anthropic. See, e.g., Benedict v. Hewlett-Packard Co., 2014 WL 233827, at *3 (N.D. Cal. Jan. 21, 2014) (granting motion to seal personal information, including a home address, phone number, and email address). The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information, including the specific technical thresholds used in the guardrails and Anthropic's guardrails strategy, would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making	

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			and business strategies employed by Anthropic's competitors in training their generative AI models.	
760-9	Ex. 132 – Excerpts of the 30(b)(6) Deposition of Vinay Rao	**Anthropic:** Yellow highlighted portions at 130:6-134:5	**Anthropic:** The highlighted portion(s) of the document contain(s) highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information, including descriptions of how the guardrails were implemented, the percentage of affected prompts, and details about guardrails exemptions, would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
760-10	Ex. 133 – Excerpts of the 30(b)(1) Deposition of Vinay Rao	**Anthropic:** Yellow highlighted portions at 97:18-100:18.	**Anthropic:** The highlighted portion(s) of the document contain(s) highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information, including	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			descriptions of how the guardrails were implemented, Anthropic's approach to guardrails development/tuning, the content included within the guardrails, would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
760-11	Ex. 134 – Excerpts of the 30(b)(1) Deposition of Thomas Turvey	**Anthropic:** Yellow highlighted portions at 57:1-64:11; 64:13-25	**Anthropic:** The highlighted portions of the document contain confidential information about various potential and actual licensing and commercial agreements between Anthropic and non-parties, revealing non-public details about the identities of Anthropic partners and potential partners who are not parties to this litigation and who have a reasonable expectation that Anthropic will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. This text also reveals confidential, non-public information about the terms and conditions of these agreements and potential agreements, including pricing and business strategy. The disclosure of this non-public information is likely to result in competitive harm to Anthropic, as it reveals strategic decision-making, which, for	

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			example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Anthropic. The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's data acquisition strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic.	
760-12	Ex. 135 – Excerpts of the Deposition of Pranay Sangani	**Anthropic:** Yellow highlighted portions at 215:23-216:7; 216:10-25; 261:1-263:13; 280:13-23	**Anthropic:** The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's data acquisition strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic. The highlighted portions of the document contain highly	**Publishers' Objections:** Yellow highlighted portions at 261:10-263:13 reflect high-level and generic descriptions of data processing and the non-specific functionality of tools used by AI companies, including Anthropic, in processing data.

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the creation of training dataset mixes, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
760-13	Ex. 136 – Excerpts of the Deposition of Dawn Drain	**Anthropic:** Yellow highlighted portions at 4:16; 106:3-107:5; 111:3-6, 117:1-24; 118:1-12; 149:1-6; 149:8-18; 151:1-21; 151:23-152:6; 154:5-9; 154:13-155:5; 155:13- 20; 155:24-156:13; 156:15-157:8; 158:3-15; 159:2-10	**Anthropic**: The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the creation of training dataset mixes, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	**Publishers' Objections:** Yellow highlighted portions at 158:3-15; 159:2-10 constitute generic descriptions and/or non-confidential information about LLM development non-proprietary to Anthropic.
760-14	Ex. 137 – Excerpts of the Expert Deposition of Abhishek Nagaraj, Ph.D.	**Anthropic:** Yellow highlighted portions at 34:19-20; 34:24-35:01; 39:11; 39:16-17	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about sources of training dataset mixes, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the	

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			competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
760-16	Ex. 140 – Excerpts of the Deposition of Donald (Duff) Berschback	**Publishers:** Blue highlighted portions at 89:1–90:8; 94:6–95:18; 125:25–127:2; 127:16–128:25; 193:1–195:18; 195:23–196:10; 196:21-25.	**Publishers:** Discloses confidential and non-public information concerning Publishers' business practices, copyright-management and deposit-copy practices for specific Works in Suit, and licensing agreement terms. Discloses financial information, including trade secrets, comprising confidential financial data. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
760-17	Ex. 141 – Excerpts of the Deposition of Alisa Coleman	**Publishers:** Blue highlighted portions at 92:20-21; 94:1–96:25; 116:4-25; 129:14–130:17; 131:16–133:12; 135:4–138:6; 139:10-21; 140:4–141:25; 142:5–144:7; 144:11–147:3; 147:14–148:17.	**Publishers:** Discloses confidential and non-public information concerning Publishers' deposit-copy management practices for specific Works in Suit, licensing agreement terms, and negotiations with third parties. Discloses highly confidential, non-public, and commercially sensitive information concerning Publishers' enforcement practices and investigations into infringement. Public disclosure of this commercially sensitive	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers. Public disclosure of this information would cause harm to Publishers arising from potential infringers seeking to avoid detection of potential or ongoing infringement of Publishers' copyrights.	
760-18	Ex. 142 – Excerpts of the Deposition of Kent Draughon	**Publishers:** Blue highlighted portions at 49:1-19; 50:13–51:28; 52:7-25; 105:1-9; 106:2-9; 197:1–198:25; 199:9–201:3; 201:8-20; 202:17–209:20; 210:2–212:25.	**Publishers:** Discloses confidential and non-public information concerning Publishers' business practices relating to the CCMG catalog, copyright-management and deposit-copy practices, licensing agreement terms, and discussions with licensees. Discloses financial information, including trade secrets, comprising confidential financial data. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
760-19	Ex. 143 – Excerpts of the Deposition of David Kokakis	**Publishers:** Blue highlighted portions at 126:10–128:2; 157:1-6; 158:4-	**Publishers:** Discloses confidential and non-public details about Publisher licensing practices, business strategies, the scope of rights typically granted to licensees,	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
		13; 233:5-14; 233:22–235:20; 236:3–240:25; 249:1-21; 250:21-24; 301:1–303:19; 304:8-25.	terms of various confidential agreements, confidential discussions with licensing counterparties and potential counterparties. Discloses highly confidential, non-public, and commercially sensitive information concerning Publishers' enforcement practices and investigations into infringement. Public disclosure of this commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers. Public disclosure of this information would cause harm to Publishers arising from potential infringers seeking to avoid detection of potential or ongoing infringement of Publishers' copyrights.	
760-20	Ex. 144 – Excerpts of the Deposition of William Pittenger	**Publishers:** Blue highlighted portions at 133:1–134:20; 135:11–136:25.	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive information concerning discussions with a potential licensee and the terms of songwriter agreements. Public disclosure of this commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			gain insight into business strategies to undercut and unfairly outcompete Publishers.	
760-23	Ex. 147 – Reply Expert Report of Dr. Ben Zhao	**Anthropic:** Yellow highlighted portions at pp. 16, 26-27, 31, 35, 37-40, 42, 46.	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the operation, training methods, and development of Claude, including its defense systems. The release of this information, including detailed descriptions of Anthropic's finetuning practices, would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models, harming Anthropic. The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's product development strategy and safety objectives, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			augment their business operations in an effort to compete unfairly against Anthropic. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about Anthropic's training data, such as the total volume of Anthropic's training data, detailed descriptions of Anthropic's deduplication processes, confidential details regarding Anthropic's crawling efforts, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information, including the amount of content included within the guardrails and the dates Anthropic implemented or adjusted guardrails, information about the technical	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			implementation of the guardrails, how the guardrails function and interact with one another, would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain confidential non-public information relating to Anthropic's business practices and operations, including specific and sensitive metrics related to Claude usage, public disclosure of which would cause competitive harm to Anthropic.	
760-24	Ex. 148 – Anthropic_000022915_2	**Anthropic:** Entire document.	**Anthropic**: The document contains highly confidential non-public information relating to Anthropic's internal business operations and strategy, including specific information regarding Anthropic's data acquisition and partnership strategy and product development strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic.	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
760-25	Ex. 149 – Anthropic_0000227016	**Anthropic:** Entire document	**Anthropic:** The document contains highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information, including step-by-step instructions for how a particular guardrail was developed, the data used to develop the guardrail, plans for future improvements, and evaluation metrics, would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
760-26	Ex. 150 – Anthropic_0000352753	**Anthropic:** Entire document	**Anthropic:** The document contains highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information, including the date Anthropic instituted Prompt Shield, would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
760-27	Ex. 151 – Anthropic_000034280 6	**Anthropic:** Entire document	**Anthropic:** The document contains highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about sources of training dataset mixes and methods to obtain that data, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
760-29	Ex. 153 – Anthropic_000050775 0	**Anthropic:** Yellow highlighted portions throughout.	**Anthropic:** The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's commercialization strategy and product development strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			compete unfairly against Anthropic. The highlighted portions of the document also contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the operation, training methods, and development of Claude. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models, harming Anthropic.	
760-31	Ex. 155 – Anthropic_000001409 6	**Anthropic:** Yellow highlighted portions at pp. 1-11.	**Anthropic**: The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about sources of training dataset mixes methods to create those mixes, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, internal technical operations, including specific and	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			sensitive details about the training methods and development of Claude. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models, harming Anthropic.	
760-32	Ex. 156 – Anthropic_000021599 2	**Anthropic:** Yellow highlighted portions at p. 2	**Anthropic:** The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's data acquisition strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic.	
760-33	Ex. 157 – Anthropic_000047924 1	**Anthropic:** Entire document	**Anthropic:** The document contains highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's data acquisition strategy, commercialization strategy, and product development strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			in an effort to compete unfairly against Anthropic. The document contains highly confidential non-public information relating to Anthropic's views of its competitors in various product markets. Disclosure of this non-public information is likely to result in competitive harm to Anthropic, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Anthropic. The document contains highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about sources of training dataset mixes and methods to obtain that data, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
760-34	Ex. 158 – Anthropic_000024066 5	**Anthropic:** Yellow highlighted portions at pp. 2-3	**Anthropic:** The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's product development strategy, public disclosure of	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic. The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal technical operations, including specific and sensitive details about internal data storage locations on Anthropic's servers, public disclosure of which would harm Anthropic's ability to maintain proper security over its data by providing bad actors with the information needed to attempt to access those locations	
760-35	Ex. 159 – Anthropic_000047858 5	**Anthropic:** Entire document	**Anthropic**: The document contains highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's commercialization strategy, and product development strategy, including specific discussions of Anthropic's nonpublic research, operations, training, and safety strategy in developing LLMs in comparison to competitors and the industry generally, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			augment their business operations in an effort to compete unfairly against Anthropic.	
760-36	Ex. 160 – Anthropic 0000217026	**Anthropic:** Entire document	**Anthropic**: The document contains confidential information about a commercial agreement between Anthropic and a non-party, revealing non-public details about the identity of an Anthropic partner who is not party to this litigation and who has a reasonable expectation that Anthropic will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. The disclosure of this non-public information is likely to result in competitive harm to Anthropic, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Anthropic. The document contains highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's product development strategy, including specific discussions of the development of safety features, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			compete unfairly against Anthropic.	
760-37	Ex. 161 – Plaintiffs' Supplemental Objections and Responses to Interrogatory No. 25	**Publishers:** Blue highlighted portion at p. 8.	**Publishers:** Discloses confidential and non-public details about Publisher licensees. Public disclosure of this commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
760-40	Ex. 164 – Anthropic_00004443301	**Anthropic:** Entire document	**Anthropic:** The document contains highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's finances, commercialization strategy, and product development strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic.	
760-41	Ex. 165 – Anthropic_00004443332	**Anthropic:** Entire document	**Anthropic**: The document contains highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's finances and funding strategy, data acquisition strategy, commercialization strategy, and product development strategy,	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			including specific discussion of nonpublic research strategy and allocation of resources, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic.	
760-42	Ex. 166 – Anthropic_000035273 2	**Anthropic:** Entire document	**Anthropic:** The document contains highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the creation of training dataset mixes, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
760-43	Ex. 167 – UMPG_000 0000311	**Publishers:** Entire document.	**Publishers:** Discloses confidential and non-public information, including trade secrets, comprising copies of lyrics licensing agreements between Publisher and various licensees, details concerning payments, royalties, rights granted, term length, and other confidential details. This material contains confidential information, including trade secrets. Public disclosure of these trade secrets and other commercially sensitive information would cause	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
760-44	Ex. 168 – CONCORD_00000002 60	**Publishers:** Entire document.	**Publishers:** Discloses confidential and non-public information, including trade secrets, comprising copies of lyrics licensing agreements between Publisher and various licensees, details concerning payments, royalties, rights granted, term length, and other confidential details. This material contains confidential information, including trade secrets. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
Publishers' Reply in Support of Motion to Partially Exclude the Opinions of Julie Davis (ECF No. 765 *et seq.*)				
765	Publishers' Reply in Support of Motion to Partially Exclude the Opinions of Julie Davis	**Anthropic:** Yellow highlighted portion at 4:9	**Anthropic:** The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's finances, public disclosure of which would cause	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic.	
Publishers' Reply in Support of Motion to Partially Exclude the Opinions of Dr. Abhishek Nagaraj (ECF No. 767 *et seq.*)				
767	Publishers' Reply in Support of Motion to Partially Exclude the Opinions of Dr. Abhishek Nagaraj	**Anthropic:** Yellow highlighted portions at pp. 2, 4, 5	**Anthropic:** The highlighted portion of the document contains confidential information about a licensing agreement between Anthropic and a non-party, revealing non-public details about the identity of an Anthropic partner who is not party to this litigation and who has a reasonable expectation that Anthropic will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. The disclosure of this non-public information is likely to result in competitive harm to Anthropic, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Anthropic. The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's data acquisition strategy, public disclosure of which would cause	**Publishers' Objections:** Yellow highlighted portions at 4 (portion beginning after "Dr. Nagaraj relies on"): The fact that Anthropic has entered into a license is not commercially sensitive and bears directly on Anthropic's willful infringement of Publishers' lyrics and would not threaten any commercial or privacy harms; other AI developers, including Anthropic's direct competitors Google and OpenAI, publicize their content licensing deals. Dr. Nagaraj's

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic.	assumptions about Anthropic's willingness to license lyrics is not confidential and concerns Anthropic's conduct that is at the center of this litigation and gives rise to Publishers' claims.
Publishers' Reply in Support of Motion to Exclude the Opinions of Dr. Jeffrey Bilmes (ECF No. 769 *et seq.*)				
769	Publishers' Reply in Support of Motion to Exclude the Opinions of Dr. Jeffrey Bilmes	**Anthropic:** Yellow highlighted portions at p. 2	**Anthropic:** The highlighted portion(s) of the document contain(s) highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the number of copies of works in suit left in training data post-Anthropic's deduplication processes, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
Publishers' Reply in Support of Motion to Exclude the Opinions of Dr. Andrew Bray (ECF No. 772 *et seq.*)				
772	Publishers' Reply in Support of Motion to Exclude the Opinions of Dr. Andrew Bray	**Anthropic:** Yellow highlighted portions at 5:6, 5:9	**Anthropic:** The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the implementation technological guardrails that Anthropic	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			designed to inhibit the replication of copyrighted content. The release of this information, including, e.g., the amount of content included, would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.	
Anthropic's Reply in Support of Motion for Summary Judgment (ECF No. 800 *et seq.*)				
800	Anthropic's Reply in Support of Motion for Summary Judgment	**Publishers:** Blue highlighted portion at p. 13. **Anthropic:** Yellow highlighted portions at pages 6, 13, 22	**Publishers:** Discloses confidential, non-public, and commercially sensitive details about Publisher revenues, expected revenues, and the impact of Anthropic's infringing conduct on those revenues. Public disclosure of commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers. **Anthropic:** The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's	**Publishers' Objections:** Yellow highlighted portions at p. 6 constitutes a non-specific and high-level range of Anthropic's revenues. The general range of Anthropic's revenues is not confidential and has been widely reported on. *See, e.g.*, Annika Kim Constantino, *Anthropic Revenue Reportedly Jumps to More than $11.5 Billion in Second Quarter*, CNBC (Aug. 16, 2026), https://www.cnbc.

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			finances, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic. The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's finances, data acquisition strategy and product development strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic.	com/2026/08/15/anthropic-revenue-jumps-to-over-11point5-billion-in-q2-report.html; *Anthropic Revenue Run Rate Tops $65 Billion, Source Say*s, REUTERS (Aug. 17, 2026), https://www.cnbc.com/2026/08/17/anthropic-says-annualized-revenue-climbed-to-65-billion-in-july.html.
800-1	Anthropic's Reply Separate Statement in Support of Motion for Partial Summary Judgment	**Publishers:** Blue highlighted portions at pp. 71-73, 88, 92, 95, 101-102, 124-26. **Anthropic**: Yellow highlighted portions at pages 3, 24, 25, 29, 30, 76, 77, 79, 82, 84-88, 112, 114, 116-	**Publishers:** Discloses highly confidential, non-public, and commercially sensitive details about Publisher business management information, including copyright management and enforcement policies and strategies, terms of confidential agreements, including with AI companies, analyses reflecting details about Publisher revenues, expected revenues, and the impact of Anthropic's infringing conduct on those revenues.	**Publishers' Objections:** Yellow highlighted portion at p. 29 (Ad. F. #26) constitutes non-confidential information concerning the number of examples Publishers identified in the 5 million sample produced by

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
		123, 133, 135-138, 144, 158, 160-163, 175, 179.	Public disclosure of this commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers. Public disclosure of this information would also cause harm to Publishers arising from potential infringers seeking to avoid detection of potential or ongoing infringement of Publishers' copyrights. **Anthropic**: The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's finances, data acquisition strategy, commercialization strategy, and/or product development strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic. The highlighted portion(s) of the document contain(s) highly confidential nonpublic information relating to Anthropic's internal technical	Anthropic. Similar information is disclosed on p. 30 (Ad. F. #28). This information could not be used to ascertain the total number of records in Anthropic's possession and does not threaten any commercial or privacy harms by its disclosure. Yellow highlighted portions at pp. 117–18 (Facts ##111-12); 120 (Fact #117); 121 (Fact #119); 123 (Fact # 121) regarding the strengthening of its output guardrails to address Publishers' lyrics specifically are not confidential, form the basis of the instant action, and bear directly on Anthropic's willful infringement of Publishers' lyrics. This fact has also been publicly disclosed by Anthropic. ECF No. 801-1 at 23.

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			operations, including specific and sensitive details about sources of training dataset mixes and methods to obtain that data, public disclosure of which would cause competitive harm to Anthropic. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, internal technical operations, including specific and sensitive details about the operation, training methods, and development of Claude, including its defense systems. The release of this information would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. And if publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models, harming Anthropic. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and	Disclosure of this fact would not threaten commercial or privacy harms.

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			sensitive details about the technological guardrails that Anthropic designed to inhibit the replication of copyrighted content. The release of this information, including the amount of content included within its guardrails and its deployment with third parties, would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models. The highlighted portions of the document contain confidential non-public information relating to Anthropic's business practices and operations, including specific and sensitive metrics related to Claude usage, public disclosure of which would cause competitive harm to Anthropic, and the contents of specific prompts and outputs, public disclosure of which would unduly intrude on the privacy of third-party Claude users	
800-2	Ex. 160 – Excerpt of Deposition Transcript of Jared Kaplan	**Anthropic:** Yellow highlighted portions at 12:16, 119:24, 221:2-13, 221:20-25	**Anthropic**: The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's commercialization	**Publishers' Objections:** Yellow highlighted portions at 221:2-13 and 221:20-25 constitute stale information about the founding of

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			strategy and product development strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic. The highlighted portions of the document contain personally identifiable information of Anthropic's employees. This text should be sealed because it reveals personally identifiable information of Anthropic's employees, who have a legitimate, legally recognized privacy interest in protecting their contact information from public disclosure. If their contact information were to be publicly disclosed, they may be subject to repeated inquiries from the press or members of the general public, which could rise to the level of threats or harassment, given the current media attention on Anthropic. See, e.g., *Benedict v. Hewlett-Packard Co.*, 2014 WL 233827, at *3 (N.D. Cal. Jan. 21, 2014) (granting motion to seal personal information, including a home address, phone number, and email address). The highlighted portions of the document contain personal financial information of Anthropic's employees. This text should be sealed because the personal financial information of non-party Anthropic employees is	Anthropic and initial goals that does not threaten commercial or privacy harms by its disclosure.

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			not relevant to any issue in the case, and Anthropic employees have a legitimate privacy interest in protecting their personal financial information from public disclosure.	
800-4	Ex. 163 – Excerpt of Deposition Transcript of Michael Smith	**Publishers:** Blue highlighted portions at 168:5-8, 21-23.	**Publishers:** Discloses confidential, non-public, and commercially sensitive details about Publisher revenues earned between 2019 and 2025. Public disclosure of this commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information about revenues to gain insight into revenue flows and business strategies to undercut and outcompete Publishers.	
800-5	Ex. 164 – Excerpt of Deposition Transcript of Dario Amoei	**Anthropic:** Yellow highlighted portions at 23:5-13, 27:8-14, 45:7-9	**Anthropic:** The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's product development strategy and risk considerations with respect to launching new products, public disclosure of which would cause competitive harm to Anthropic. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the	**Publishers' Objections:** Yellow highlighted portion at 27:8-14 constitutes generic and well-known information about LLM capabilities that does not threaten commercial or privacy harms by its disclosure.

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			development of Claude, such as model testing and the size and ability of Claude relative to a human brain. If publicly revealed, this information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models, harming Anthropic.	
800-6	Ex. 165 – Excerpt of Deposition Transcript of Thomas B. Brown, Jr.	**Anthropic:** Yellow highlighted portions at pg. 6:7, 8:21.	**Anthropic:** The highlighted portions of the document contain personally identifiable information of Anthropic's employees. This text should be sealed because it reveals personally identifiable information of Anthropic's employees, who have a legitimate, legally recognized privacy interest in protecting their contact information from public disclosure. If their contact information were to be publicly disclosed, they may be subject to repeated inquiries from the press or members of the general public, which could rise to the level of threats or harassment, given the current media attention on Anthropic. See, e.g., *Benedict v. Hewlett-Packard Co.*, 2014 WL 233827, at *3 (N.D. Cal. Jan. 21, 2014) (granting motion to seal personal information, including a home address, phone number, and email address).	
800-7	Ex. 166 – Excerpt of Deposition Transcript of David Kokakis	**Publishers:** Blue highlighted portions at 249:1–21; 250:21–24;	**Publishers:** Discloses confidential and non-public details about Publisher business strategies, terms of confidential agreements, confidential discussions with potential licensees, and financial	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
		253:1–5; 254:12–256:2.	information, including trade secrets, comprising revenue information. Public disclosure of these trade secrets and other commercially sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
800-8	Ex. 167 – Excerpt of Deposition Transcript of Thomas Turvey	**Anthropic:** Yellow highlighted portions at 107:15-108:6	**Anthropic:** The highlighted portion of the document contains highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's data acquisition strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic.	
800-9	Ex. 168 - MusixMatch Agreement	**Publishers:** Entire document.	**Publishers:** Discloses confidential and non-public information, including trade secrets, comprising copies of lyrics licensing agreements between Publisher and licensees, details concerning payments, royalties, rights granted, term length, and other confidential details. Public disclosure of these trade secrets and other commercially	

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			sensitive information would cause harm to Publishers, including but not limited to harms from market competitors who would use the unduly disclosed information to gain insight into business strategies to undercut and unfairly outcompete Publishers.	
800-10	Ex. 173 – Excerpt of Deposition Transcript of Benjamin Mann	**Anthropic**: Yellow highlighted portions at 105:1-3, 6-14, 17-23, 106:5-8, 144:10-14	**Anthropic**: The highlighted portion of the document contain highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and strategy, including specific information regarding Anthropic's data acquisition strategy public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, internal technical operations, including specific and sensitive details about the training methods and development of Claude, including its content defense systems. The release of this information would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for evading Anthropic's content guardrails processes. If publicly revealed, this	**Publishers' Objections:** Yellow highlighted portions at 105:1–106:8 constitute high-level and non-trade secret information about Anthropic's policy regarding requests to remove training data from its corpora and does not threaten commercial or privacy harms by its disclosure.

ECF No.[1]	Document	Portion(s) to be Sealed	Reason(s) for Sealing	Specific Objections
			information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models, harming Anthropic.	
800-15	Ex. 184 – Excerpt of Deposition Transcript of Ben Zhao	**Publishers:** Blue highlighted portion at 7:22-23.	**Publishers:** Discloses address of deponent's personal abode that is not relevant to the instant action. Disclosure of the personally identifiable information would cause significant privacy harm to the individual concerned.	