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Attorneys for Defendant
ANTHROPIC PBC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

CONCORD MUSIC GROUP, INC., ET AL.,

Plaintiffs,

v.

ANTHROPIC PBC,

Defendant.

Case No. 5:24-cv-03811-EKL-SVK

DECLARATION OF JARED KAPLAN IN SUPPORT OF PARTIES' JOINT OMNIBUS SEALING MOTION TO SEAL ANTHROPIC MATERIALS FILED IN CONNECTION WITH SUMMARY JUDGMENT AND *DAUBERT* MOTIONS

Judge: Hon. Eumi K. Lee
Magistrate Judge: Hon. Susan van Keulen

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I, Jared Kaplan, declare as follows:

1. I am a co-founder and the Chief Science Officer of Defendant Anthropic PBC. I have been employed by Anthropic since 2021 and have held my current title since 2023. I submit this declaration in support of Anthropic's request to seal the below documents filed in connection with the Parties' motions for summary judgment and *Daubert* motions, as further described in the Parties' Joint Omnibus Sealing Motion ("Omnibus Motion").

2. Over the course of my employment at Anthropic, I have acquired personal knowledge concerning the maintenance of the confidentiality of Anthropic's business operations and practices, specifically: knowledge of the confidentiality of how Anthropic's generative artificial intelligence models are created and trained, its technical capacities and processes, including the development of its guardrails and other defense systems, the acquisition of data in connection with training the model, and Anthropic's, strategic, financial, and business operations related to its models.

3. The facts set forth in this declaration are true and correct to the best of my knowledge, information, and belief, and are based on Anthropic's policies and practices as they relate to the treatment of such confidential information, and materials that were provided to me and reviewed by me, or conversations with other knowledgeable employees of Anthropic. I have knowledge of the facts set forth herein, and if called to testify as a witness, could do so competently under oath.

4. All the material for which Anthropic requests sealing is maintained as highly confidential. To the best of my knowledge, none of this material has been publicly disclosed. As demonstrated with factual particularity below, there are compelling reasons to seal Anthropic's confidential materials.

5. As further explained in the Omnibus Motion, Anthropic seeks to keep strictly confidential the following categories of highly sensitive, nonpublic information, which, as a matter of internal policy, Anthropic treats as strictly confidential: (1) the details of Anthropic's commercial or licensing agreements with non-parties, including the identity of non-parties, specific contractual terms, and details concerning negotiations or negotiating strategy; (2) confidential business information related to Anthropic's operations, systems, processes, or strategy, including data

acquisition, product development, or commercialization strategy, financial information, or evaluation of competitors in various product markets; (3) details about Anthropic's internal technical operations, including sources of training data and acquisition methods, model or guardrail development, or specifics about data storage; and (4) specific metrics of Claude usage. These categories of highly confidential or highly sensitive information could cause significant harm to Anthropic if publicly disclosed, either because they could significantly prejudice Anthropic's competitive position by harming its relationships with business partners, jeopardize ongoing or future business negotiations, or allow competitors to gain an unfair advantage in competition with Anthropic.

6. For example, the public disclosure of Anthropic's internal, confidential material could reveal Anthropic's strategic decision-making regarding commercialization, data acquisition, Anthropic's partnerships with certain data providers, the training dataset mixes (and the methods to obtain such data), model usage, financial information, and model development. Such disclosure could influence the business strategies employed by Anthropic's competitors, enabling them to mimic Anthropic's confidential strategies in developing AI models. Training data, how that training data is used, and the technical systems and processes involved in the inputs and outputs are crucial to the development of generative AI assistants. Anthropic operates in the burgeoning and highly competitive generative AI industry. If disclosed, information about specific data sources, makeup of datasets, methods of obtaining data, the technical processes and systems used in connection with the generation of outputs, product usage statistics, and financial information related to usage of Anthropic's models would allow Anthropic's competitors to mimic Anthropic's proprietary business strategies, training processes, dataset mixes, and the technological systems that Anthropic uses to train its models and that govern their outputs. These details are competitively sensitive technical information because they are arrived at after significant effort, expense, and research trial and error.

7. Further, the materials contain information regarding Anthropic's technical practices, including specific details about Anthropic's proprietary guardrails and defense systems, including

when and how they were developed and the data used to implement those systems, public disclosure of which would cause competitive harm to Anthropic. Anthropic's guardrail systems and the selection of data used in those guardrails are proprietary and highly confidential information. Anthropic designed its guardrails and defense systems to inhibit the replication of copyrighted content, as well as a host of other harmful or undesired content. Public disclosure of the specific, sensitive technical details about the guardrails' functionality, operation, and design would create a substantial risk that bad actors could reverse engineer and circumvent these protections, undermining the very purpose of these safeguards.

8. The specific information Anthropic seeks to seal is identified in the tables below, with numbered rows for the Court's ease of reference:

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
1	612	Publishers' Motion for Partial Summary Judgment	Yellow highlighted portions at pp. 4:19-22, 14:12.	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.
			Yellow highlighted portions at pp. 12:24-13:5.	The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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.
			Yellow highlighted portions at p. 33.	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.
2	612-1	Publishers' Moving Separate Statement	Yellow highlighted portions at p. 2.	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,

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Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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 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.
			Yellow highlighted portions at pp. 9, 39.	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.
			Yellow highlighted portions at p. 19.	The highlighted portions of the document contain highly confidential non-

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Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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 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 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.

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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.
			Yellow highlighted portions at p. 20.	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

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				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 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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.
			Yellow highlighted portion at p. 21.	The highlighted portion of 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 training their generative AI models.
			Yellow highlighted portions at p. 28.	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

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				against or negotiating with Anthropic.
			Yellow highlighted portions at p. 33.	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.
			Yellow highlighted portions at p. 44	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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				against or negotiating with Anthropic.
3	611-3	Ex. 4 – Excerpts of the 30(b)(6) Deposition of Benjamin Mann	Yellow highlighted portions at 204:6-22.	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.
			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; 76:19-79:3; 87:18-20; 95:5-8; 100:17-106:8.	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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic.
			Yellow highlighted portions at 57:2-58:4; 59:16-18; 69:3-70:6; 71:20-72:10; 73:2-6; 74:1-5; 113:21-114:3.	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.
			Yellow highlighted portions at 144:10-14; 146:25-2; 148:14-152:5.	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. 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.

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
4	611-4	Ex. 5 – Excerpts of the 30(b)(1) Deposition of Benjamin Mann	Yellow highlighted portions at 40:8-17; 56:4-56:25; 73:25-74:11; 97:1-100:4.	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, 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.
			Yellow highlighted portions at 76:16-20; 80:8-16; 81:17-82:12; 100:7-100:18.	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. 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.
5	611-5	Ex. 6 – Excerpts of the 30(b)(1)	Yellow highlighted portions at 245:1; 245:6-10; 245:14; 246:11-12; 247:12-13;	The highlighted portions of the document contain highly confidential non-

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
		Deposition of Jared Kaplan	247:17-19; 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.	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 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.
6	611-6	Ex. 7 – Excerpts of the 30(b)(6) Deposition of Thomas Turvey	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; 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; 112:17-20.	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

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				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 38:2-40:2; 40:5-41:23; 42:1-15; 96:8; 96:13.	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. 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 identities 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 their own confidential statements made during negotiations. This text also reveals confidential, non-public information about

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				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.
7	611-8	Ex. 9 – Excerpts of the 30(b)(1) Deposition of Deep Ganguli	Yellow highlighted portions at 218:18-19.	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.
8	611-11	Ex. 12 – Excerpts of the 30(b)(1) Deposition of Pranay Sangani	Yellow highlighted portions at 201:1-11; 201:13-202:2; 203:20-204:6; 204:9-18; 204:20-25.	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.

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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 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.
9	611-12	Ex. 13 – Excerpts of the 30(b)(1) Deposition of Dario Amodei	Yellow highlighted portions at p. 16.	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 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.
			Yellow highlighted portions at pp. 37-38.	The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal

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				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.

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
10	611-13	Ex. 14 – Excerpts of the 30(b)(6) Deposition of Tom Brown	Yellow highlighted portions at 305:21-308:15	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.
11	611-15	Ex. 16 – Excerpts of the Expert Deposition of Abhishek Nagaraj, PhD	Yellow highlighted portions at 157:19-23; 158:02-07; 158:10-21; 158:25-159:03	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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic.
12	611-16	Ex. 17 – Expert Report of Abhishek Nagaraj, PhD	Yellow highlighted portions at ¶¶ 46 & nn. 68-69.	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.
			Yellow highlighted portions at ¶¶ 58 & nn.88-91; 59 & n.93; 73; 80 & n.128.	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

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				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 ¶¶ 23 & n.39; 36, 37 & n.47; 40 & n.56; 42 n.58; 49 & n.77; 55; 56 & nn.81, 84, 85.	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.
			Yellow highlighted portions at ¶¶ 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.	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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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.
13	611-19	Ex. 20 – Excerpts of the 30(b)(6) Deposition of Vinay Rao	Yellow highlighted portions at 47:16-48:23; 81:13-84:20; 93:25-100:23; 121:19-124:25	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 training their generative AI models.

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
14	611-21	Ex. 23 – Sangani 128, Anthropic_0000 346083	Yellow highlighted portion at p. 2.	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, 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.
			Yellow highlighted portions at pp. 3-4.	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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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.
15	611-22	Ex. 24 – Anthropic_0000 343228	Entire document	The document contains highly confidential nonpublic information relating to Anthropic's internal technical 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.
16	611-23	Ex. 25 – Defendant Anthropic PBC's Amended Supplemental Response to Publishers' Interrogatories 9, 11, 12	Yellow highlighted portions at pp. 12-14.	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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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.
17	611-25	Ex. 27 – Anthropic_0000 570510	Entire document	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.
18	611-26	Ex. 28 – Anthropic_0000 570511	Entire document	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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				prompts and outputs, public disclosure of which would unduly intrude on the privacy of third-party Claude users.
19	611-27	Ex. 29 – Defendant Anthropic PBC's Amended Supplemental Response to Publishers' Interrogatory No. 4	Yellow highlighted portions at pp. 7-8.	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.
20	611-28	Ex. 30 – Anthropic_0000 429489	Entire document	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.
21	611-29	Ex. 31 – Anthropic_0000 429482	Entire document	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.

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
22	611-30	Ex. 32 – Anthropic_0000 429485	Entire document	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.
23	611-31	Ex. 33 – Anthropic_0000 429486	Entire document	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.
24	611-32	Ex. 34 – Anthropic_0000 429488	Entire document	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.
25	611-33	Ex. 35 – Anthropic_0000 429490	Entire document	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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				competitive harm to Anthropic.
26	611-38	Ex. 40 – Anthropic_0000 217166	Entire document	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.

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
27	611-39	Ex. 41 – Anthropic_0000 605700	Yellow highlighted portions at pp. 3-5, 7-11, 13, 18-19, 21-22, 25-27, 32, 37-40, 44, 48-50, 53, 57, 65, 70, 72-74, 78-79, 83-86.	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 training their generative AI models.

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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.
			Yellow highlighted portions at pp. 2, 6, 14, 17, 20, 24, 28-29, 31, 41-43, 46-47, 51-52, 54-55, 56, 58-60, 63, 64, 66-68, 71, 75, 77, 81-82, 87.	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,

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				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.
			Yellow highlighted portion at p. 30.	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.
28	611-40	Ex. 42 – Anthropic_0000 599647	Yellow highlighted portions at p. 1.	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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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.
29	611-41	Ex. 43 – Anthropic_0000458427	Entire document	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

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				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.
30	611-43	Ex. 45 – Anthropic_0000226164	Yellow highlighted portions at pp. 1-3.	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, 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.
31	611-44	Ex. 46 – Anthropic_0000443204	Entire document	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

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				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.
32	611-46	Ex. 48 – Defendant Anthropic's Amended Supplemental Response to Publishers' Interrogatory No. 12	Yellow highlighted portion at p. 6.	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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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.
33	611-47	Ex. 49 – Anthropic_0000 242173	Entire document	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.
34	611-48	Ex. 50 – Anthropic_0000 477486	Entire document	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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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. 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.
35	611-49	Ex. 53 – Anthropic_0000478271	Yellow highlighted portions at pp. 5-6, 10, 12, 19-21,	The highlighted portions of the document contain highly confidential non-

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
			24-26, 33-34, 42-43, 49, 58, 64, 67-76, 79, 81.	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.
			Yellow highlighted portions at pp. 3, 38, 41, 55-56, 59.	The highlighted portions of the document contain confidential information about potential and actual commercial agreements between Anthropic and non-parties, revealing non-public details about the identities 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. 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.

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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.
			Yellow highlighted portion at p. 9.	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
			Yellow highlighted portion at p. 60.	The highlighted portion of the document contains confidential non-public information relating to Anthropic's business practices and operations,

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				including specific and sensitive metrics related to Claude usage, public disclosure of which would cause competitive harm to Anthropic.
36	611-50	Ex. 54 – Anthropic_0000 525947	Yellow highlighted portion at p. 7.	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.
37	611-51	Ex. 55 – Anthropic_0000 459162	Yellow highlighted portions at pp. 3-7, 13-14.	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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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.
38	611-52	Ex. 56 – Anthropic_0000554366	Yellow highlighted portions at pp. 17, 19, 21-23.	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.

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				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.
39	611-53	Ex. 57 – Anthropic_0000 526003	Yellow highlighted portions at pp. 2, 9-10, 15, 24.	The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details 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.
40	611-57	Ex. 61 – Anthropic_0000 554980	Yellow highlighted portions at pp. 1-13.	The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including

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				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.
41	611-58	Ex. 62 – Anthropic_0000 527903	Yellow highlighted portions at pp. 3, 10-11, 13, 18, 23-26.	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.
42	611-60	Ex. 64 – Anthropic_0000 459249	Yellow highlighted portions at pp. 5, 6, 8-23, 29-44.	The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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.
43	611-61	Ex. 65 – Anthropic_0000 557304	Yellow highlighted portions at pp. 2-3, 5-7, 11-56.	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.
44	611-62	Ex. 66 – Anthropic_0000 459543	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,	The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
			258, 260, 262, 264, 266, 269, 272.	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.
45	611-63	Ex. 67 – Anthropic_0000 557359	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.	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.
46	611-64	Ex. 68 – Anthropic_0000 557015	Yellow highlighted portion at pp. 6, 7-9, 15, 17-19, 21, 30-31.	The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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.
47	611-65	Ex. 69 – Anthropic_0000241820	Yellow highlighted portion at pp. 5-26, 29-43, 45-52, 54-58, 50-67.	The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details 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.
48	611-66	Ex. 70 – Anthropic_0000459487	Yellow highlighted portion at pp. 7, 11.	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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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.
49	611-067	Ex. 71 – Claude Prompt/Output	Yellow highlighted portions at pp. 2-8, 9-45, 47-70, 72-74, 77-84, 86-90.	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 data storage

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				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.
50	611-68	Ex. 72 – Anthropic_0000 554405	Yellow highlighted portion at pp. 22.	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.
51	611-69	Ex. 74 – Anthropic_0000 458491	Entire Document	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

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				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.
52	611-70	Ex. 75 – Anthropic_0000 507750	Yellow highlighted portions throughout.	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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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.
53	611-90	Ex. 97 – Anthropic_0000 444967	Entire document	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 discussions regarding proprietary research, training methods, and development of frontier LLMs, 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.
54	611-91	Ex. 98 – Anthropic_0000 216987	Entire document	The document contains highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and

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				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 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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.
55	611-92	Ex. 100 – Anthropic_0000 441649	Entire document	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 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.
56	611-97	Ex. 105 – Anthropic_0000 441309	Entire document	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, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic.
57	611-98	Ex. 106 – Anthropic_0000 429484	Entire document	The document contains confidential non-public information relating to Anthropic's business practices and operations,

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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.
58	611-104	Ex. 114 – Anthropic_0000429496	Entire document	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.
59	611-108	Ex. 119 – Excerpts of the 30(b)(1) Deposition of Thomas Turvey	Yellow highlighted portions at 65:1-4, 65:7-19, 65:22-66:7, 67:1-2, 67:4-14, 67:17-19, 68:1-69:6, 69:9-70:22, 71:8-72:11, 72:13-16.	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

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				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.
60	605	Declaration of Dr. Michael Smith in Support of Plaintiffs' Motion for Partial Summary Judgment	Yellow highlighted portion at ¶ 94.	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. 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.
			Yellow highlighted portions at ¶¶ 83 n.105, 91, 93 & n.118, 95, 96 & n.12, 99, 100, 101.	The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations,

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				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.
			Yellow highlighted portions at ¶¶ 97 & n.130, 98.	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.
			Yellow highlighted portions at ¶¶ 61, 64, 92 & nn.110, 111	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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.
61	605-29	Ex. 30 – Anthropic_0000 229152	Entire document	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.
62	605-31	Ex. 32 – Anthropic_0000 218479	Yellow Highlighted portions pp. 2-4, 6.	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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				effort to compete unfairly against Anthropic.
63	605-32	Ex. 33 – Anthropic_0000 228080	Yellow highlighted portions at pp. 3-4, 7.	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 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.
64	605-33	Ex. 34 – Anthropic_0000 441006	Entire Document	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.

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
65	605-34	Ex. 35 – Anthropic_0000217184	Entire document	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 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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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.
66	605-35	Ex. 36 – Anthropic_0000582634	Entire document	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.
67	605-36	Ex. 37 – Anthropic_0000429496	Entire document	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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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.
68	605-37	Ex. 38 – Anthropic_0000 231226	Entire document	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.
69	605-38	Ex. 39 – Anthropic_0000 215992	Yellow highlighted portion at p. 2.	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

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				internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic.
70	605-39	Ex. 40 – Anthropic_0000479241	Entire document	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 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

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				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.
71	605-41	Ex. 42 – Anthropic_0000443204	Entire document	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 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

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				example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Anthropic.
72	608	Declaration of Joshua Dennis in Support of Plaintiffs' Motion for Partial Summary Judgment	Yellow highlighted portions at pp. 5, 13, 14, 16.	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.
73	609	Declaration of Shawn Shan in Support of Plaintiffs' Motion for Partial Summary Judgment	Yellow highlighted portions at ¶¶ 25, 33, 36-37, 41, 44.	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, 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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				Anthropic's competitors in training their generative AI models.
74	609-2	Ex. C – Anthropic_0000 016066	Entire document	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.
75	609-3	Ex. D – Anthropic_0000 352701	Entire document	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.
76	609-4	Ex. E – Anthropic_0000 240831	Yellow highlighted portions throughout.	The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations,

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				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 also 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 training their generative AI models. The highlighted portions of the document also 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

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				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.
77	609-5	Ex. F – Anthropic_0000 342792	Entire document	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, 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.

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
78	606	Declaration of Ben Zhao in Support of Plaintiffs' Motion for Partial Summary Judgment	Yellow highlighted portions at ¶¶ 15, 23 & n.23, 45.	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.
			Yellow highlighted portions at ¶¶ 21, 29, 42, 70.	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.
			Yellow highlighted portions at n.71, ¶¶ 62, 71-73, 75-77, 79, 80, 82-86, 88- 89.	The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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.
			Yellow highlighted portions at nn.71 & 75.	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.
79	606-1	Ex. B – Anthropic_0000218479	Yellow highlighted portions at pp. 1-3, 5.	The highlighted portions of the document contain highly confidential non-public information relating to Anthropic's internal business operations,

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				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.
80	606-2	Ex. D – Sangani 128 (Anthropic_0000346083)	Yellow highlighted portion at p. 2.	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, 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.
			Yellow highlighted portions at pp. 3-4.	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

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				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.
81	606-4	Ex. F – Anthropic's Amended and Supplemental Responses and Objections to Plaintiffs' First Set of Interrogatories (Nos. 9, 11, 12)	Yellow highlighted portions at pp. 12-14.	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

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				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.
82	606-5	Ex. G. – Drain 140	Yellow highlighted portions throughout.	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,

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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.
83	606-6	Ex. H – Anthropic_0000458427	Entire document	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

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				against or negotiating with Anthropic.
84	606-7	Ex. I – Anthropic_0000500599	Yellow highlighted portions throughout.	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.
85	606-9	Ex. K – Amodei 172	Entire document	The document contains highly confidential non-public information relating to Anthropic's internal business operations,

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				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.
86	606-10	Ex. L – Anthropic_0000478271	Yellow highlighted portions at pp. 5-6, 10, 12, 19-21, 24-26, 33-34, 42-43, 49, 58, 64, 67-76, 79, 81.	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.
			Yellow highlighted portions at pp. 3, 38, 41, 55-56, 59.	The highlighted portions of the document contain confidential information about potential and actual commercial agreements between Anthropic and non-parties, revealing non-public details about the identities of Anthropic partners who are not parties to this litigation and who

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				have 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 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.
			Yellow highlighted portion at p. 9.	The highlighted portion of the document contains highly confidential non-public information relating to Anthropic's internal technical operations, including specific and

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				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
			Yellow highlighted portion at p. 60.	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.
87	606-11	Ex. M – Anthropic_0000 525947	Yellow highlighted portion at p. 7.	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.

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
88	606-12	Ex. N – Anthropic_0000 459162	Yellow highlighted portions at pp. 3-7, 13-14.	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.
89	606-13	Ex. O – Anthropic_0000 554366	Yellow highlighted portions at pp. 17, 19, 21-23.	The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's

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				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.
90	606-15	Ex. Q – Anthropic_0000 554980	Yellow highlighted portions at pp. 1-13.	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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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.
91	606-16	Ex. R – Anthropic_0000 527903	Yellow highlighted portions at pp. 3, 10-11, 13, 18, 23-26.	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.
92	606-17	Ex. S – Messages with Claude	Yellow highlighted portions at pp. 2-8, 9-45, 47-70, 72-74, 77-84, 86-90.	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,

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				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
93	606-20	Ex. V – Anthropic_0000458491	Entire Document	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

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				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.
94	606-21	Ex. W – Anthropic_0000 344064	Yellow highlighted portions at pp. 2 and 4.	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.
95	606-39	Ex. OO – Anthropic_0000 477560	Entire document	The document contains highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive

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				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 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 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.

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
96	606-40	Ex. PP – Anthropic_0000 217166	Entire document	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.
97	606-41	Ex. QQ – Anthropic_0000 477437	Entire document	The document contains highly confidential non-public information relating

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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 training their generative AI models.
98	606-42	Ex. RR – Kaplan 238	Entire document	The document contains highly confidential nonpublic information relating to Anthropic's internal technical operations, including

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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.
99	606-43	Ex. SS – Kaplan 240	Yellow highlighted portions at pp. 2-3.	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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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.
			Yellow highlighted portion at p. 2.	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.
100	606-44	Ex. TT – Anthropic_0000240665	Yellow highlighted portions at pp. 2-3.	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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				an effort to compete unfairly against Anthropic.
			Yellow highlighted portion at p. 2.	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.
101	606-47	Ex. XX – Anthropic_0000 227016	Entire document	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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.
102	606-48	Ex. YY – Anthropic_0000 010906	Entire Document	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.
103	606-49	Ex. ZZ – Anthropic_0000 012437	Entire Document	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.
104	606-50	Ex. AAA – Anthropic_0000 347810	Entire Document	The document contains highly confidential nonpublic information relating to Anthropic's internal technical

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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.
105	606-51	Ex. BBB. 2025.12.11 Anthropic's Am. Supp. Resp. to ROG No. 12	Yellow highlighted portion at p. 6.	The highlighted portion of 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 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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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.
106	606-52	Ex. CCC – Anthropic_0000 242173	Entire document	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.
107	654-6	Ex. F – Excerpts of the 30(b)(1) Deposition of Ben Mann	Yellow highlighted portions at 113:30-114:3.	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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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.
108	654-7	Ex. G – Excerpts of Reply Expert Report of Abhishek Nagaraj, Ph.D.	Yellow highlighted portions at p. 24, n.103.	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.
109	655	Motion in Limine to Exclude the Opinions of Dr. Jeffrey Bilmes	Yellow highlighted portions at pp. 2, 4, 6-7.	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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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.
110	655-2	Ex. A – Expert Report of Jeffrey Bilmes, Ph.D.	Yellow highlighted portions at pp. 13-14, 69-70, 73, 75-76, 80-81, 84, 86, 88, 93-94, 114, 186-191, 199, 201-202, 226, 248 tbl. 21 & n.699, 251 n.704, 252 ¶¶ 427-428 & nn.706-708, 254 ¶ 432, 256, 258 ¶ 440, 259 ¶ 443.	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.
			Yellow highlighted portions at pp. 11, 130, 155-156.	The highlighted portions of the document contain highly confidential nonpublic information

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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.
			Yellow highlighted portions at pp. 113, 126, 132-133, 135-152, 170-171, 182-183, 276-277.	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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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.
			Yellow highlighted portions at pp. 184, 231-232.	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.
			Yellow highlighted portions at pp. 209, 228, 230, 248 n.698, 249 n.701, 250, 251 ¶ 422 & nn.702 & 705, 252 ¶¶ 426-427 & nn.707-708, 253 n.709, 254 ¶¶ 431-433, 255 n.711, 258 ¶ 440, 259 ¶¶ 442 & 445, 260, 261	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,

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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.
111	655-3	Ex. B – Rebuttal Expert Report of Jeffrey Bilmes, Ph.D.	Yellow highlighted portions at pp. 35, 56, 58-60, 62-65, 68, 147, 151-152, 195-199, 202-203, 205, 213.	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, and 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.
			Yellow highlighted portions at pp. 10, 50, 77, 83-84, 93, 97, 117 ¶¶ 167-168.	The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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.
			Yellow highlighted portions at pp. 98, 100-101, 103-107, 114-116, 117 ¶ 169 & n.488, 118-119, 134-135, 144-145, 212.	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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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.
			Yellow highlighted portions at pp. 11-12, 157, 160.	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.
			Yellow highlighted portions at pp. 195 & tbl. 29 & n.661, 196 ¶¶ 288-289, 197 ¶¶ 291 & 293, 198 ¶¶ 295-296, 199 ¶ 297, 200-201 tbl. 32, 202 ¶ 306, 203 ¶ 307, 204, 205 ¶¶ 313-315.	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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				ability to maintain proper security over its data by providing bad actors with the information needed to attempt to access those locations.
112	655-4	Ex. C – Rebuttal Expert Report of Jeffrey Bilmes, Ph.D.	Yellow highlighted portions at pp. 58, 60-61, 63-64, 111-115, 119, 125, 144 tbl. 14, 146 ¶ 247, 147 tbl. 15, 150 tbl. 16, 153-154, 155 tbl. 18, 186.	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.
			Yellow highlighted portions at pp. 84-85.	The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				details about the operation of Claude. 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.
			Yellow highlighted portions at pp. 73, 78, 80, 100, 106-107, 178.	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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.
			Yellow highlighted portions at pp. 9, 128-134, 140, 163-175.	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.
			Yellow highlighted portions at pp. 140-144, 146 ¶ 247, 147 ¶¶ 249-250 & tbl. 15, 148-149, 150 ¶ 259, 151-152, 154 ¶ 268, 155 ¶¶ 269-270, 156, 160-161.	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.
113	655-5	Ex. D – J. Bilmes Dep. Transcript	Yellow highlighted portions at 41:1-42:3; 151:18-158:15.	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,

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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.
114	656	Motion in Limine to Exclude the Opinions of Dr. Andrew Bray	Yellow highlighted portions at pp. ii, 1-3, 9-10.	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.

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
115	656-2	Ex. A – Expert Report of Dr. Andrew Bray	Yellow highlighted portions at pp. 5-8, 9, 12, 40-43, Tbl. 1 at 1.	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.
116	656-3	Ex. B – Expert Reply Report of Dr. Andrew Bray	Yellow highlighted portions at Table of Contents, pp. 3, 23, 32, 33.	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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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.
117	657-2	Ex. A – Expert Report and Disclosure of Julie L. Davis	Yellow highlighted portions at pp. 25, 32-33, 35-37, 41, 44, 46-48.	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.
			Yellow highlighted portions at pp. 25-28, 31, 43.	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-

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				making and business strategies employed by Anthropic's competitors in training their generative AI models.
			Yellow highlighted portions at pp. 37-38.	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 training their generative AI models.
118	657-3	Ex. B – Rebuttal Expert Report and Disclosure of Julie L. Davis	Yellow highlighted portions at Table of Contents, pp. 13-14, 16-19, 28.	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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic.
			Yellow highlighted portions at pp. 5-6, 8-9, 11.	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.
119	657-4	Ex. C – Reply Expert Report and Disclosure of Julie L. Davis	Yellow highlighted portions at pp. 7, 15.	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.
120	659	Motion in Limine to Partially	Yellow highlighted portions at p. 7.	The highlighted portion of the document contains highly confidential non-

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
		Exclude the Opinions of Dr. Abhishek Nagaraj		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.
			Yellow highlighted portion at p. 8.	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. 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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				competing against or negotiating with Anthropic.
121	659-2	Ex. A – Expert Report of Abhishek Nagaraj, Ph.D.	Yellow highlighted portions at ¶¶ 46 & nn. 68-69.	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.
			Yellow highlighted portions at ¶¶ 58 & nn.88-91, 59 & n.93, 73, 80 & n.128.	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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				effort to compete unfairly against Anthropic.
			Yellow highlighted portions at ¶¶ 23 & n.39, 36, 37 & n.47, 40 & n.56, 42 n.58; 49 & n.77, 55, 56 & nn.81, 84, 85.	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.
			Yellow highlighted portions at ¶¶ 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.	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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.
122	659-3	Ex. B –Expert Rebuttal Report of Abhishek Nagaraj, Ph.D.	Yellow highlighted portions at ¶¶ 95 n.188, 105 & nn.211 & 227, 125	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.
			Yellow highlighted portions at ¶¶ 110 & nn.223 & 227, 110 & n.223, 113 & n.233, 117 & n.244, 122, 123.	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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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 ¶¶ 104, 113 & n.233.	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.
			Yellow highlighted portions at ¶¶ 142, 146, 147, 152 n.329, 162, 173, 179, 180, 181.	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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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.
123	659-4	Ex. C – Excerpts of the Deposition of Dr. Abhishek Nagaraj	Yellow highlighted portions at 34:19-20; 34:25-35:01; 39:11; 39:16-17; 61:17-18; 68:11-23.	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.
124	659-5	Ex. D –Excerpts of the 30(b)(1) Deposition of Tom Turvey	Yellow highlighted portions at 41:1-42:9; 43:13-21; 43:25-44:25; 61:1-64:11; 64:13-64:25	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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic.
125	659-6	Ex. E –Excerpts of the 30(b)(6) Deposition of Tom Turvey	Yellow highlighted portions at 38:2-40:2, 40:5-41:23, 42:1-15	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. 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 identities 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 their own confidential statements made during negotiations. This text also reveals confidential, non-public information about the terms and conditions of

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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.
126	663	Motion in Limine to Exclude Expert Testimony and Opinions of Ben Zhao	Yellow highlighted portion at p. 10.	The highlighted portion of 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 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.
127	663-1		Yellow highlighted portion at p. 18.	The highlighted portions of the document contain

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
		Ex. 1 – Opening Expert Report of Dr. Ben Zhao		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.
			Yellow highlighted portion at pp. 19, 24.	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.
			Yellow highlighted portion at pp. 31, 43.	The highlighted portions of the document contain highly confidential nonpublic information

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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 training their generative AI models, harming Anthropic.
			Yellow highlighted portions at pp. 41-42, 44-51.	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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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.
			Yellow highlighted portions at pp. 37-38.	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.
128	663-2	Ex. 2 – Rebuttal Expert Report of Dr. Ben Zhao	Yellow highlighted portion at p. 39.	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 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.
			Yellow highlighted portions at pp. 30, 36.	The highlighted portions of the document contain

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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.
			Yellow highlighted portions at pp. 42-43.	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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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.
129	663-3	Ex. 3 – Reply Expert Report of Dr. Ben Zhao	Yellow highlighted portion at p. 16.	The highlighted portion of 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, including its defense systems. The release of this information, including detailed descriptions of 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.
			Yellow highlighted portion at p. 46.	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 product development strategy and safety objectives, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic.
			Yellow highlighted portions at pp. 26-27, 31, 35.	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.
			Yellow highlighted portions at pp. 37-40.	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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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.
			Yellow highlighted portion at p. 42.	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.
130	663-6	Ex. 6 – Anthropic's Amended and Supplemental Responses and Objections to Plaintiffs' Interrogatory Request Nos. 9, 11, 12	Yellow highlighted portions at pp. 12-14.	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

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				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.
131	666-1	Ex. 1 – Expert Report of Dr. Shawn Shan	Yellow highlighted portion at p. 25.	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 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.
			Yellow highlighted portion at p. 26.	The highlighted portion of the document contains

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				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.
132	666-2	Ex. 2 – Expert Report of Joshua W. Dennis	Yellow highlighted portions at pp. 19-20, 23-24, 27, 29, 100, 102, 122.	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.
133	666-3	Ex. 3 – Reply Expert Report and	Yellow highlighted portions at pp. 7-8, 11, 104-106, 108, 119-120.	The highlighted portions of the document contain confidential non-public

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
		Supplemental Report of Joshua W. Dennis		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.
134	666-8	Ex. 9 – Excerpts of the Rebuttal Expert Opinion of Professor Michael D. Smith	Yellow highlighted portion at ¶ 127.	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.
135	666-9	Ex. 10 – Excerpts of the Expert Reply Opinion of Professor Michael D. Smith	Yellow highlighted portion at ¶¶ 161, 162, 163.	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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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.
136	681-1	Ex. 1 – Expert Report of Professor Michael D. Smith	Yellow highlighted portion at ¶ 149.	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. 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.
			Yellow highlighted portions at ¶¶ 105, 106, 146, 147, 148, 150, 151, 154, 155, 156, 193, 194, 204.	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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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.
			Yellow highlighted portion at ¶ 152.	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.
137	681-2	Ex. 2 – Rebuttal Expert Opinion of Prof. Michael D. Smith	Yellow highlighted portions at ¶¶ 24, 31, 34, 43, 44, 49, 50, 55, 59, 71, 74, 75, 76 & n.40, 85.	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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic.
			Yellow highlighted portion at ¶ 57.	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.
			Yellow highlighted portion at ¶ 48.	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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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
			Yellow highlighted portions at ¶¶ 127, 130, 147.	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.
			Yellow highlighted portion at ¶ 50.	The highlighted portion of the document contains 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

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				strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Anthropic.
138	681-3	Ex. 3 – Expert Reply Opinion of Professor Michael D. Smith	Yellow highlighted portions at ¶¶ 10 & n.11, 87, 88, 89 & n.85, 102, 161, 162, 163.	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.

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
139	681-5	Ex. 7 – M. Smith Transcript	Yellow highlighted portions at 152:17, 261:04-06, 261:14-16.	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.
140	681-7	Ex. 9 – Excerpts of the Expert Report of Abhishek Nagaraj, Ph.D.	Yellow highlighted portions at ¶¶ 111, 112 & n.173, 115, 121, 123 & n.182, 135 & n.189, 136, 143.	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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				Anthropic's competitors in training their generative AI models.
141	681-8	Ex. 11 – Expert Report and Disclosure of Julie L. Davis	Yellow highlighted portion at p. 48.	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 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.
142	694	Anthropic's Motion for Summary Judgment and Opposition to Publishers' Motion for Partial Summary Judgment (Corrected), ECF No. 694	Yellow highlighted portions at pp. 3, 6, 7, 18, 27, 28.	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 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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.
			Yellow highlighted portions at pp. 19, 20.	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.
143	687-1	Anthropic's Moving Separate Statement in Support of Motion for Summary Judgment	Yellow highlighted portions at pp. 17-18, 24.	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 training their generative AI models.
			Yellow highlighted portion at p. 23.	The highlighted portion of the document contains highly confidential non-

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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.
			Yellow highlighted portions at pp. 26-28.	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.

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144	687-2	Anthropic's Response to Plaintiffs' Moving Separate Statement in Support of Motion for Partial Summary Judgment	Yellow highlighted portions at pp. 5-7, 88, 122-23.	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 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.
			Yellow highlighted portion at p. 9.	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. The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including

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				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.
			Yellow highlighted portions at pp. 27, 108.	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.
			Yellow highlighted portion at p. 57.	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 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.

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				The highlighted portion of 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 its post-suit 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.
			Yellow highlighted portion at p. 58.	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 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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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 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 portion of 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 would harm Anthropic's ability to safeguard its products because it would reveal or suggest to individuals a method for

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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.
			Yellow highlighted portions at pp. 59, 61, 65-72, 74.	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.
			Yellow highlighted portion at p. 60.	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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				information regarding Anthropic's commercialization 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 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.
			Yellow highlighted portions at pp. 80-81.	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

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				business partner unfair leverage in competing against or negotiating with Anthropic.
			Yellow highlighted portions at pp. 92, 125.	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 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.
			Yellow highlighted portions at pp. 117-18.	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

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				competitor or potential business partner unfair leverage in competing against or negotiating with Anthropic.
145	687-4	Ex. 2 – Expert Report of Jeffrey Bilmes, Ph.D.	Yellow highlighted portions at pp. 13-14, 69-70, 73, 75-76, 80-81, 84, 86, 88, 93-94, 114, 186-191, 199, 201-202, 226, 248 tbl. 21 & n.699, 251 n.704, 252 ¶¶ 427-428 & nn.706-708, 254 ¶ 432, 256, 258 ¶ 440, 259 ¶ 443.	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.
			Yellow highlighted portions at pp. 11, 130, 155-156.	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

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				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.
			Yellow highlighted portions at pp. 113, 126, 132-133, 135-152, 170-171, 182-183, 276-277.	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

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				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.
			Yellow highlighted portions at pp. 184, 231-232.	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.
			Yellow highlighted portions at pp. 209, 228, 230, 248 n.698, 249 n.701, 250, 251 ¶ 422 & nn.702 & 705, 252 ¶¶ 426-427 & nn.707-708, 253 n.709, 254 ¶¶ 431-433, 255 n.711, 258 ¶ 440, 259 ¶¶ 442 & 445, 260, 261.	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

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				attempt to access those locations.
146	687-5	Ex. 3 – Opening Expert Report of Dr. Andrew Bray	Yellow highlighted portions at pp. 5-8, 9, 12, 40-43, Tbl. 1 at 1.	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.
147	687-6	Ex. 4 – Expert Report and Disclosure of Julie L. Davis	Yellow highlighted portions at pp. 25, 32-33, 35-37, 41, 44, 46-48.	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

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				data to modify or augment their business operations in an effort to compete unfairly against Anthropic.
			Yellow highlighted portions at pp. 25-28, 31, 43.	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.
			Yellow highlighted portions at pp. 37-38.	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

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				information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.
148	687-8	Ex. 6 – Expert Report of Abhishek Nagaraj, Ph.D.	Yellow highlighted portions at ¶¶ 46 & nn. 68-69.	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.
			Yellow highlighted portions at ¶¶ 58 & nn.88-91, 59 & n.93, 73, 80 & n.128.	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

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				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 ¶¶ 23 & n.39; 36, 37 & n.47, 40 & n.56; 42 n.58, 49 & n.77, 55, 56 & nn.81, 84, 85.	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.
			Yellow highlighted portions at ¶¶ 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.	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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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.
149	687-9	Ex. 7 – Expert Report of Dr. Shawn Shan	Yellow highlighted portions at pp. 13-15, 19, 21-23, 25, Ex. D (pp. 1-9), Ex. E (pp. 1-144); Ex. F (p. 1).	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.
			Yellow highlighted portions at pp. 11, 26-31, Ex. G (4 pp.), Ex. H (pp. 1-8), Ex. I (pp.1-492), Ex. K (1 p.), Ex. L (2 pp.).	The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's

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				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 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.
150	687-10	Ex. 8 – Expert Report of Professor Michael D. Smith	Yellow highlighted portions at ¶ 149.	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

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				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.
			Yellow highlighted portions at ¶¶ 106, 146, 147, 148, 150, 151, 154, 155, 156, 193, 194, 204.	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.
			Yellow highlighted portions at ¶ 152.	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

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				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.
151	687-12	Ex. 10 – Expert Report of Dr. Ben Zhao	Yellow highlighted portion at p. 18.	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.
			Yellow highlighted portions at pp. 19, 24.	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

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				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.
			Yellow highlighted portions at pp. 31, 43.	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.
			Yellow highlighted portions at pp. 41-42, 44-51.	The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including

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				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.
			Yellow highlighted portions at pp. 37-38.	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.
152	687-13	Ex. 11 – Expert Rebuttal Report	Yellow highlighted portions at pp. 35, 56, 58-60, 62-65,	The highlighted portions of the document contain highly confidential

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		of Jeffrey Bilmes, Ph.D.	68, 147, 151-152, 195-199, 202-203, 205, 213.	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, and 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.
			Yellow highlighted portions at pp.10, 50, 77, 83-84, 93, 97, 117 ¶¶167-168.	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

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				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.
			Yellow highlighted portions at pp. 98, 100-101, 103-107, 114-116, 117 ¶ 169 & n.488, 118-119, 134-135, 144-145, 212.	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

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				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.
			Yellow highlighted portions at pp. 11-12, 157, 160.	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.
			Yellow highlighted portions at pp. 195 & tbl. 29 & n.661, 196 ¶¶ 288-289, 197 ¶¶ 291 & 293, 198 ¶¶ 295-296, 199 ¶ 297, 200-201 tbl. 32, 202 ¶ 306, 203 ¶ 307, 204, 205 ¶¶ 313-315.	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.
153	687-14	Ex. 12 – Rebuttal Expert Report of Dr. Andrew Bray	Yellow highlighted portions at pp. 5, 28, 30.	The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's

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				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.
154	687-15	Ex. 13 – Expert Opposition Report of Joshua W. Dennis	Yellow highlighted portions at pp. 5, 66, 71.	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

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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.
			Yellow highlighted portions at pp. 6, 68-69, 75.	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.
155	687-17	Ex. 15 – Expert Rebuttal Report of Abhishek Nagaraj, Ph.D.	Yellow highlighted portions at ¶¶ 95 n.188, 105 & n.211, 110 & n.223, n.227, 125.	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.

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			Yellow highlighted portions at ¶¶ 110 & n.223, n.227, 110 & n.223, 113 & n.233, 117 & n.244, 122, 123.	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.
			Yellow highlighted portions at ¶¶ 104, 113 & n.233.	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.
			Yellow highlighted portions at ¶¶ 142, 146, 147, 152 n.329, 162, 173, 179, 180, 181.	The highlighted portions of the document contain highly confidential nonpublic information

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				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.
156	687-18	Ex. 16 – Rebuttal Expert Report of Dr. Shawn Shan	Yellow highlighted portions at p. 4.	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 strategies employed by Anthropic's competitors in training their generative AI models.

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			Yellow highlighted portions at pp. 8, 13-14.	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.
157	687-19	Ex. 17 – Rebuttal Expert Opinion of Professor Michael D. Smith	Yellow highlighted portion at ¶ 57.	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

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				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.
			Yellow highlighted portions at ¶¶ 24, 31, 34, 43, 44, 49, 50, 55, 59, 71, 74, 75, 76 & n.40, 85.	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.
			Yellow highlighted portion at ¶ 48.	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

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				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
			Yellow highlighted portions at ¶¶ 127, 130, 147.	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.
			Yellow highlighted portion at ¶ 50.	The highlighted portion of the document contains 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

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				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.
158	687-20	Ex. 18 – Rebuttal Expert Report of Dr. Ben Zhao	Yellow highlighted portion at p. 39.	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 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.
			Yellow highlighted portions at pp. 30, 36.	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

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				could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.
			Yellow highlighted portions at pp. 42-43.	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.
159	687-21	Ex. 19 – Expert Reply Report of Jeffrey Bilmes, Ph.D.	Yellow highlighted portions at pp. 58, 60-61, 63-64, 111-115, 119, 125, 144 tbl. 14, 146 ¶ 247, 147 tbl. 15, 150 tbl. 16, 153-154, 155 tbl. 18, 186.	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

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				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.
			Yellow highlighted portions at pp. 84-85.	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 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.

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
			Yellow highlighted portions at pp. 73, 78, 80, 100, 106-107, 178.	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.
			Yellow highlighted portions at pp. 9, 128-134, 140, 163-175.	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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				Claude usage, public disclosure of which would cause competitive harm to Anthropic.
			Yellow highlighted portions at pp. 140-144, 146 ¶ 247, 147 ¶¶ 249-250 & tbl. 15, 148-149, 150 ¶ 259, 151-152, 154 ¶ 268, 155 ¶¶ 269-270, 156, 160-161.	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.
160	687-22	Ex. 20 – Reply Expert Report of Dr. Andrew Bray	Yellow highlighted portions at Table of Contents, pp. 3, 23, 32, 33.	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

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				influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.
161	687-23	Ex. 21 – Expert Reply Report & Supplemental Report of Joshua W. Dennis	Yellow highlighted portions at pp. 7-8, 11, 104-106, 108, 119-120.	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.
162	687-24	Ex. 22 – Exhibit 8 to the Expert Reply Report and Supplemental Report of Joshua W. Dennis	Entire document	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.
163	687-25	Ex. 23 – Expert Reply Report of Abhishek Nagaraj, Ph.D.	Yellow highlighted portions at ¶¶ 63 & nn.148, 149, 151, 64.	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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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.
			Yellow highlighted portions at ¶¶ 30 n.53, 60 & n.139, 62 & n.147, 65, 67 & nn.166, 167, 89 & n.235, 90 & n.241.	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.
			Yellow highlighted portions at ¶¶ 49 n.103, 60 n.136, 71 n.174, 97.	The highlighted portions of the document contain highly confidential

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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.
			Yellow highlighted portion at ¶ 142.	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.
			Yellow highlighted portions at ¶¶ 108, 109 & n.292, 114, 120, 123 & n.317, 124, 126, 136, 137, 140, 151, 152, 153, 154, 155, 156, 164, 165.	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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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.
164	687-26	Ex. 24 – Reply Report of Dr. Shawn Shan	Yellow highlighted portion at pp. 2, 4-8, 10-11, App'x p.2.	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 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.
			Yellow highlighted portions at pp. 11-14.	The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including

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				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 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.
165	687-27	Ex. 25 – Expert Reply Opinion of Professor Michael D. Smith	Yellow highlighted portions at ¶¶ 10 & n.11, 87, 88, 89 & n.85; 102, 161, 162, 163.	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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				an effort to compete unfairly against Anthropic.
166	687-31	Ex. 30 – Defendant Anthropic PBC's Amended and Supplemental Responses and Objections to Plaintiffs' First Set of Interrogatories (Nos. 9, 11, 12)	Yellow highlighted portions at pp. 12-14.	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.
167	687-39	Ex. 54 – Anthropic_0000216987	Entire Document	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,

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				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. 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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				training their generative AI models.
168	687-40	Ex. 55 – Anthropic_0000 228080	Yellow highlighted portions at pp. 3-4, 7.	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 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.
169	687-41	Ex. 56 – Anthropic_0000 231226	Entire document	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.
170	687-47	Ex. 66 – Anthropic_0000 458427	Entire document	This document contains highly confidential non-public information relating to Anthropic's internal business operations, systems, processes, and

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				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.
171	687-48	Ex. 67 – Anthropic_0000458491	Entire Document	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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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.
172	687-49	Ex. 68 – Anthropic_0000459162	Yellow highlighted portions at pp. 3-7, 13-14.	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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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.
173	687-50	Ex. 69 – Anthropic_0000459249	Yellow highlighted portions at pp. 5, 6, 8-23, 29-44.	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.

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
174	687-51	Ex. 70 – Anthropic_0000459415	Yellow highlighted portions at pp. 15-20, 29.	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 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.
175	687-52	Ex. 71 – Anthropic_0000459487	Yellow highlighted portions at pp. 7, 11.	The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details 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.

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
176	687-53	Ex. 72 – Anthropic_0000 459543	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.	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.
177	687-54	Ex. 73 – Anthropic_0000 507750	Yellow highlighted portions throughout.	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.

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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.
178	687-55	Ex. 74 – Anthropic_0000 525947	Yellow highlighted portions at p. 7.	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.
179	687-56	Ex. 75 – Anthropic_0000 526003	Yellow highlighted portions at pp. 2, 7, 9-10, 15, 24.	The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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.
180	687-57	Ex. 76 – Anthropic_0000 527903	Yellow highlighted portions at pp. 3, 10-11, 13, 18, 23-26.	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.
181	687-59	Ex. 78 – Anthropic_0000 554366	Yellow highlighted portions at pp. 17-19, 21-23.	The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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
182	687-60	Ex. 79 – Anthropic_0000 554980	Yellow highlighted portions at pp. 1-13.	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,

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				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.
183	687-61	Ex. 80 – Anthropic_0000 557015	Yellow highlighted portion at pp. 6, 7-9, 15, 17-19, 21, 30-31.	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.
184	687-62	Ex. 81 – Anthropic_0000 557304	Yellow highlighted portions at pp. 2-3, 5-7, 11-56.	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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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.
185	687-63	Ex. 82 – Anthropic_0000 557359	Yellow highlighted portion at pp. 1, 69, 79, 86, 94, 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.
186	687-82	Ex. 112 – Excerpts of the Deposition of Dario Amodei	Yellow highlighted portions at p. 16.	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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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.
			Yellow highlighted portions at pp. 37-38, 44.	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.
187	687-84	Ex. 116 – Excerpts of the Deposition of Dawn Drain	Yellow highlighted portions at 4:16; 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.	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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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.
188	687-92	Ex. 124 – Excerpts of the 30(b)(1) Deposition of Ben Mann Volume 1	Yellow highlighted portions at 3:16, 73:2-74:11, 97:1-100:18.	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.
			Yellow highlighted portions at 76:16-20, 80:8-82:12.	The highlighted portion(s) of the document contain(s) 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. If publicly revealed, this information could also influence the competitive decision-making and business

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				strategies employed by Anthropic's competitors in training their generative AI models, harming Anthropic.
189	687-94	Ex. 126 – Excerpts of the 30(b)(6) Deposition of Ben Mann	Yellow highlighted portions at 30:5-32:20, 87:18-20, 105:1-106:8.	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.
			Yellow highlighted portions at 57:2-59:18, 113:21-114:3.	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.

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
190	687-95	Ex. 128 – Excerpts of the 30(b)(1) Deposition of Vinay Rao	Yellow highlighted portions at 33:2-19, 34:7-14, 35:1-3, errata (p. 6 PDF).	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 training their generative AI models, harming Anthropic.
			Yellow highlighted portions at 34:17-18; 35:20-36:20.	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

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				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.
191	687-96	Ex. 129 – Excerpts of the 30(b)(6) Deposition of Vinay Rao	Yellow highlighted portions at p. 5 (exhibit list)	The highlighted portion of 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 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 Anthropic's competitors in training their generative AI models.
192	687-97	Ex. 130 – Excerpts of the Deposition of Pranay Sangani	Yellow highlighted portions at 118:1-4, 118:6-10, 118:12-17.	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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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 119:10-24, 120:1-13, 120:16-23.	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.
193	687-98	Ex. 131 – Excerpts of the Deposition of Shawn Shan	Yellow highlighted portion at 232:24-25, 300:2, 313:16-314:9.	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, 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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				strategies employed by Anthropic's competitors in training their generative AI models.
			Yellow highlighted portion at p. 21 of PDF (errata).	The highlighted portion of 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 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.
194	687-99	Ex. 132 – Excerpts of the Deposition of Michael Smith Volume 1	Yellow highlighted portions at 76:18, 76:22-23.	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

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				the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.
195	687-102	Ex. 138 – Excerpts of the 30(b)(6) Deposition of Thomas Turvey	Yellow highlighted portion at 107:15-108:6.	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.
196	739	Publishers' Opposition to Motion to Exclude the Expert Testimony and Opinions of Michael D. Smith	Yellow highlighted portion at p. 10.	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.
197	747-1	Ex. 1 – Excerpts of the Deposition of Shawn Shan	Yellow highlighted portion at p. 232:24-25	The highlighted portion of the document contains highly confidential nonpublic information relating to Anthropic's

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				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 training their generative AI models.
			Yellow highlighted portion at p. 8 of PDF (errata).	The highlighted portion of 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 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

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198	747-2	Ex. 3 – Excerpts of the Expert Report of Jeffrey Bilmes, Ph.D.	Yellow highlighted portions at pp. 201-202.	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, this information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.
199	749	Anthropic's Opposition to Publishers' Motion in Limine to Exclude the Opinions of Dr. Jeffrey Bilmes	Yellow highlighted portion at p. 5.	The highlighted portion of the document contains 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.
			Yellow highlighted portion at p. 10.	The highlighted portion of the document contains

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				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 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.
200	749-4	Ex. 6 – Excerpts of the Reply Expert Report of Dr. Ben Zhao	Yellow highlighted portion at p. 35.	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 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.
201	749-8	Ex. 10 – Excerpts of the Reply Report of Dr. Shawn Shan	Yellow highlighted portion at p. 5.	The highlighted portion of the document contains highly confidential nonpublic information relating to Anthropic's

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				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 strategies employed by Anthropic's competitors in training their generative AI models.
202	749-9	Ex. 11 – Excerpts of the 30(b)(6) Deposition of Ben Mann	Yellow highlighted portion at 204:6-22.	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.
203	751	Anthropic's Opposition to	Yellow highlighted portions at pp. 3, 10.	The highlighted portions of the document contain

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
		Publishers' Motion in Limine to Partially Exclude the Opinions of Dr. Andrew Bray		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.
204	751-1	Ex. 1 – Reply Expert Report of Dr. Andrew Bray	Yellow highlighted portions at Table of Contents, pp. 3, 23, 32, 33.	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

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				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.
204	753	Anthropic's Opposition to Publishers' Motion in Limine to Partially Exclude the Opinions of Dr. Abhishek Nagaraj	Yellow highlighted portions at 3:28, 5:20-21.	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.
			Yellow highlighted portion at 8:19-24.	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. This text also reveals confidential, non-

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				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.
			Yellow highlighted portions at 8:07-09, 8:27.	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.
206	753-1	Ex. 2 – Expert Reply Report of Abhishek Nagaraj, Ph.D.	Yellow highlighted portions at ¶¶ 63 & nn.148, 149, 151, 64.	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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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.
			Yellow highlighted portions at ¶¶ 30 n.53, 60 n.139; 62 & n.147, 67 n.166-167, 89 n.235.	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.
			Yellow highlighted portions at ¶¶ 49 n.103, 60 n.136, 71 n.174, 97.	The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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.
			Yellow highlighted portion at ¶ 142.	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.
			Yellow highlighted portions at ¶¶ 108, 109 n.292, 114, 120, 123 & n.317, 124, 126, 136, 137, 140, 151, 152, 153, 154, 155, 156, 164, 165.	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

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				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.
207	753-2	Ex. 3 – Excerpts of the Expert Report of Professor Michael D. Smith	Yellow highlighted portions at ¶¶ 105, 106.	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.
208	753-3	Ex. 4 – Excerpts of the Deposition of Ben Mann	Yellow highlighted portion at 113:21-114:3.	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

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				the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.
209	743-8	Ex. 10 – Excerpts of Rebuttal Expert Report of Dr. Ben Zhao	Yellow highlighted portion at p. 36.	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 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.
210	743-9	Ex. 11 – Excerpts of Rebuttal Expert Report of Dr. Shawn Shan	Yellow highlighted portion at p. 14.	The highlighted portion of 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 descriptions of the technical implementation of the

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				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.
211	759	Publishers' Opposition to Anthropic's Motion for Summary Judgment and Reply in Support of Publishers' Motion for Partial Summary Judgment	Yellow highlighted portion at p. 6.	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.
			Yellow highlighted portion at p. 26.	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

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				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.
212	759-1	Publishers' Responsive Separate Statement to Anthropic's Moving Separate Statement in Support of its Motion for Summary Judgment	Yellow highlighted portions at pp. 3, 58, 72, 117.	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.
			Yellow highlighted portion at p. 14.	The highlighted portion of 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

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				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.
			Yellow highlighted portions at pp. 16-17.	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.
			Yellow highlighted portions at pp. 53-54, 56, 74, 93, 110.	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 training their generative AI models.
			Yellow highlighted portion at p. 59.	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

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				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 training their generative AI models.
			Yellow highlighted portions at pp. 83, 94.	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

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				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.
213	759-2	Publishers' Reply Separate Statement in Support of Motion for Partial Summary Judgment	Yellow highlighted portions at pp. 5-7, 92, 130.	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 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.
			Yellow highlighted portion at p. 9.	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

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				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.
			Yellow highlighted portions at pp. 26, 113.	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.
			Yellow highlighted portion at p. 58.	The highlighted portion of the document contains highly confidential non-

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				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 portion of 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 its post-suit 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.

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			Yellow highlighted portion at p. 59.	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 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 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.

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				The highlighted portion of 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 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.
			Yellow highlighted portions at pp. 60, 62, 69-76, 78.	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

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				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.
			Yellow highlighted portion at p. 61.	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 commercialization 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 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

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				leverage in competing against or negotiating with 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 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.
			Yellow highlighted portion at p. 64.	The highlighted portion of 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

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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.
			Yellow highlighted portions at pp. 84-85, 137.	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.
			Yellow highlighted portions at pp. 97, 133-34.	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 commercialization strategy, public disclosure of which would cause competitive harm to Anthropic. Anthropic's competitors could improperly utilize this internal, non-public

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				data to modify or augment their business operations in an effort to compete unfairly against Anthropic.
			Yellow highlighted portions at pp. 122, 126, 129.	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.
214	760-1	Ex. 124 – Excerpts of the Deposition of Ben Mann Volume 1	Yellow highlighted portions at 62:12-64:21.	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-

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				making and business strategies employed by Anthropic's competitors in training their generative AI models.
215	760-2	Ex. 125 – Excerpts of the Deposition of Ben Mann Volume 2	Yellow highlighted portion at 3:16.	The highlighted portion of the document contains 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 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.
			Yellow highlighted portions at 81:17-82:12, 103:17-20, 116:11-117:21.	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. 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.
			Yellow highlighted portion at 118:9-25.	The highlighted portion of the document contains

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				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.
216	760-3	Ex. 126 – Excerpts of the Deposition of Dario Amodei	Yellow highlighted portions at pp. 45, 128.	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

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				effort to compete unfairly against Anthropic.
			Yellow highlighted portions at pp. 66, 68-70, 72.	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.
217	760-4	Ex. 127 – Excerpts of the Deposition of Daniela Amodei	Yellow highlighted portions at pp. 145-148.	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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic
218	760-5	Ex. 128 – Excerpts of the Deposition of Jared Kaplan	Yellow highlighted portions at 138:4-138:11, 138:13-139:2, 154:4-9, 201:8-22, 201:24-202:10, 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.	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 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.

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
			Yellow highlighted portions at 202:12-203:4, 203:6-13, 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.	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-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.
			Yellow highlighted portions at 165:1-8, 166:10-19.	The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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.
219	760-6	Ex. 129 – Excerpts of the Deposition of Thomas B. Brown, Jr.	Yellow highlighted portions at pp. 81:1, 82:1.	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.

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
			Yellow highlighted portions at pp. 303-308.	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.
220	760-9	Ex. 132 – Excerpts of the 30(b)(6) Deposition of Vinay Rao	Yellow highlighted portions at 130:6-134:5.	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 how the guardrails were

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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.
221	760-10	Ex. 133 – Excerpts of the 30(b)(1) Deposition of Vinay Rao	Yellow highlighted portions at 97:18-100:18.	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 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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.
222	760-11	Ex. 134 – Excerpts of the 30(b)(1) Deposition of Thomas Turvey	Yellow highlighted portions at 57:1-64:11, 64:13-25.	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 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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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.
223	760-12	Ex. 135 – Excerpts of the Deposition of Pranay Sangani	Yellow highlighted portions at 215:23-216:7, 216:10-25.	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.
			Yellow highlighted portions at 261:1-263:13, 280:13-23.	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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				information could influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models.
224	760-13	Ex. 136 – Excerpts of the Deposition of Dawn Drain	Yellow highlighted portions at 4:16; 106:3-107:5, 111:3-6117:1-24, 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.	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.
225	760-14	Ex. 137 – Excerpts of the Expert Deposition of Abhishek Nagaraj, Ph.D.	Yellow highlighted portions at 34:19-20, 34:24-35:01, 39:11, 39:16-17.	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.
226	760-23	Ex. 147 – Zhao Reply 02.13.26	Yellow highlighted portion at p. 16.	The highlighted portion of the document contains

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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.
			Yellow highlighted portion at p. 46.	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 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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				business operations in an effort to compete unfairly against Anthropic.
			Yellow highlighted portions at pp. 26-27, 31, 35.	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.
			Yellow highlighted portions at pp. 37-40.	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

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				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.
			Yellow highlighted portion at p. 42.	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.
227	760-24	Ex. 148 – Anthropic_0000 229152	Entire document	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

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				could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic.
228	760-25	Ex. 149 – Anthropic_0000 227016	Entire document	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.
229	760-26	Ex. 150 – Anthropic_0000 352753	Entire document	The document contains highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive details about the technological guardrails

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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 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.
230	760-27	Ex. 151 – Anthropic_0000 342806	Entire document	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.
231	760-29	Ex. 153 – Anthropic_0000 507750	Yellow highlighted portions throughout.	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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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.
232	760-31	Ex. 155 – Anthropic_0000 014096	Yellow highlighted portions at pp. 1-11.	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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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 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.
233	760-32	Ex. 156 – Anthropic_0000215992	Yellow highlighted portion at p. 2.	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.

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234	760-33	Ex. 157 – Anthropic_0000 479241	Entire document	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 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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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.
235	760-34	Ex. 158 – Anthropic_0000240665	Yellow highlighted portions at pp. 2-3.	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.
			Yellow highlighted portion at p. 2.	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 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

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				attempt to access those locations.
236	760-35	Ex. 159 – Anthropic_0000 478585	Entire document	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 augment their business operations in an effort to compete unfairly against Anthropic.
237	760-36	Ex. 160 – Anthropic 0000217026	Entire document	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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				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 compete unfairly against Anthropic.
238	760-40	Ex. 164 – Anthropic_0000444301	Entire document	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

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				internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Anthropic.
239	760-41	Ex. 165 – Anthropic_0000 444332	Entire document	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.
240	760-42	Ex. 166 – Anthropic_0000 352732	Entire document	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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				training their generative AI models.
241	765	Publishers' Reply in Support of Motion to Partially Exclude the Opinions of Julie Davis	Yellow highlighted portion at 4:9.	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 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.
242	767	Publishers' Reply in Support of Motion to Partially Exclude the Opinions of Dr. Abhishek Nagaraj	Yellow highlighted portion at 4:4-5.	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.

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
			Yellow highlighted portion at 4:11-15.	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.
243	769	Publishers' Reply in Support of Motion to Exclude the Opinions of Dr. Jeffrey Bilmes	Yellow highlighted portion at p. 2.	The highlighted portion of the document contains 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.
244	772	Publishers' Reply in Support of Motion to Exclude the	Yellow highlighted portions at 5:6, 5:9.	The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
		Opinions of Dr. Andrew Bray		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.
245	800	Anthropic's Reply in Support of Motion for Summary Judgment	Yellow highlighted portion at p. 6.	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 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.
			Yellow highlighted portions at pp. 13, 22.	The highlighted portions of the document contain highly confidential non-public information relating

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				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.
246	800-1	Anthropic's Reply Separate Statement in Support of Motion for Partial Summary Judgment	Yellow highlighted portions at pp. 3, 24, 25, 82, 112, 175.	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.
			Yellow highlighted portions at pp. 76, 77, 79, 84, 85, 86, 87, 88, 114, 158, 160, 161, 162, 163.	The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's internal technical operations, including specific and sensitive

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				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.
			Yellow highlighted portions at pp. 135, 144.	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.
			Yellow highlighted portions at pp. 116, 117, 118, 119, 120, 121, 122, 123, 133, 135, 136, 137, 138, 179.	The highlighted portions of the document contain highly confidential nonpublic information relating to Anthropic's

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				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 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.
			Yellow highlighted portions at pp. 29, 30.	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.

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247	800-2	Ex. 160 – Excerpt of Deposition Transcript of Jared Kaplan	Yellow highlighted portions at 221:2-13, 221:20-25.	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.
248	800-5	Ex. 164 – Excerpt of Deposition Transcript of Dario Amoei	Yellow highlighted portion at 45:7-9.	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 product development strategy and risk considerations with respect to launching new products, public disclosure of which would cause competitive harm to Anthropic.
			Yellow highlighted portions at pp. 23:5-13, 27:8-14.	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

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				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.
249	800-8	Ex. 167 – Excerpt of Deposition Transcript of Thomas Turvey	Yellow highlighted portion at 107:15-108:6.	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.
250	800-10	Ex. 173 – Excerpt of Deposition Transcript of Benjamin Mann	Yellow highlighted portion at 105:1-106:8 .	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

Row No.	ECF No.	Document	Portion(s) to be Sealed	Reason(s) for Sealing
				modify or augment their business operations in an effort to compete unfairly against Anthropic.
			Yellow highlighted portion at 144:10-14.	The highlighted portion of the document contains 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 information could also influence the competitive decision-making and business strategies employed by Anthropic's competitors in training their generative AI models, harming Anthropic.

I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct.

Executed on 9/22/2026 at San Francisco.

Jared Kaplan

Jared Kaplan

SIGNATURE ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3), I hereby attest that concurrence in the filing of this document was obtained from the signatory of this document. I declare under penalty of perjury that the foregoing is true and correct.

Date: September 22, 2026

/s/ Sonal N. Mehta
Sonal N. Mehta