

Under Civil Local Rules 7-11 and 79-5, Plaintiffs bring this administrative motion to determine whether or not relevant evidence designated “confidential” by Defendant Anthropic PBC should be sealed and removed from the public record. Plaintiffs are not the proponents of sealing. Rather, Plaintiffs bring this administrative motion solely because Civil Local Rule 79-5 and the Protective Order require that any information designated “Confidential” by an opposing party be filed provisionally under seal pending the Court’s determination of whether or not the party’s confidentiality designation was appropriate. *See* ECF No. 63.

This Motion addresses 33 exhibits to the Declaration of Jacob S. Miller in Support of Plaintiffs’ Motion for Class Certification and 2 exhibits to the Declaration of Ben Y. Zhao, in addition to the declarations and motions themselves. In considering whether documents should be sealed, courts “start with a strong presumption in favor of access to court records.” *Foltz v. State Farm Mut. Auto. Ins. Co.*, 331 F.3d 1122, 1136 (9th Cir. 2003). This presumption against sealing may only be overcome if a party “demonstrate[s] compelling reasons to keep the documents under seal.” *Ctr. for Auto Safety v. Chrysler Grp., LLC*, 809 F.3d 1092, 1103 (9th Cir. 2016). Plaintiffs outline the status of each document in the table below:

Document	Party Claiming Confidentiality	Portions to Be Filed Under Seal	Anthropic’s Basis for Sealing
Notice of Motion and Motion for Class Certification	Defendant Anthropic PBC	Portions highlighted in yellow throughout	Refers to material designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Revised Stipulated Protective Order (Dkt. 63)
Declaration of Jacob S. Miller in Support of Class Certification	Defendant Anthropic PBC	Portions highlighted in yellow throughout	Refers to material designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Revised Stipulated Protective Order (Dkt. 63)

Document	Party Claiming Confidentiality	Portions to Be Filed Under Seal	Anthropic's Basis for Sealing
Declaration of Ben Y. Zhao	Defendant Anthropic PBC	Portions highlighted in yellow throughout	Refers to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Revised Stipulated Protective Order (Dkt. 63)
Zhao Decl. Exhibit C	Defendant Anthropic PBC	Entirety of the document	Refers to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Revised Stipulated Protective Order (Dkt. 63)
Zhao Decl. Exhibit D	Defendant Anthropic PBC	Entirety of the document	Refers to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Revised Stipulated Protective Order (Dkt. 63)
Miller Decl. Exhibit 1: Anthropic PBC's First Supplemental Objections and Responses to Plaintiffs' First Set of Interrogatories (Nos. 1-5)	Defendant Anthropic PBC	Entirety of the document	Refers to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Revised Stipulated Protective Order (Dkt. 63)
Miller Decl. Exhibit 2: Anthropic PBC's Second Supplemental Objections and Responses to Plaintiffs' Second Set of Interrogatories (Nos. 6-13)	Defendant Anthropic PBC	Entirety of the document	Refers to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Revised Stipulated Protective Order (Dkt. 63)

Document	Party Claiming Confidentiality	Portions to Be Filed Under Seal	Anthropic's Basis for Sealing
Miller Decl. Exhibit 3: Anthropic PBC's First Supplemental Objections and Responses to Plaintiffs' Third Set of Interrogatories (Nos. 14-17)	Defendant Anthropic PBC	Entirety of the document	Refers to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Revised Stipulated Protective Order (Dkt. 63)
Miller Decl. Exhibit 4: Anthropic PBC's First Supplemental Objections and Responses to Plaintiffs' First Set of Requests for Admissions (Nos. 1-15)	Defendant Anthropic PBC	Entirety of the document	Refers to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Revised Stipulated Protective Order (Dkt. 63)
Miller Decl. Exhibit 5: Anthropic PBC's First Supplemental Objections and Responses to Plaintiffs' Second Set of Requests for Admissions (Nos. 16-17)	Defendant Anthropic PBC	Entirety of the document	Refers to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Revised Stipulated Protective Order (Dkt. 63)
Miller Decl. Exhibit 6: Excerpts of the Deposition of Pranay Sangani	Defendant Anthropic PBC	Entirety of the document	Refers to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Revised Stipulated Protective Order (Dkt. 63)
Miller Decl. Exhibit 7: Exhibit 3 to Deposition of Pranay Sangani	Defendant Anthropic PBC	Entirety of the document	Refers to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Revised Stipulated Protective Order (Dkt. 63)

Document	Party Claiming Confidentiality	Portions to Be Filed Under Seal	Anthropic's Basis for Sealing
Miller Decl. Exhibit 8: Bates numbered ANT_BARTZ_000003492-3	Defendant Anthropic PBC	Entirety of the document	Refers to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Revised Stipulated Protective Order (Dkt. 63)
Miller Decl. Exhibit 9: Bates numbered ANT_BARTZ_000004587-8	Defendant Anthropic PBC	Entirety of the document	Refers to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Revised Stipulated Protective Order (Dkt. 63)
Miller Decl. Exhibit 10: Bates numbered ANT_BARTZ_000004031-7	Defendant Anthropic PBC	Entirety of the document	Refers to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Revised Stipulated Protective Order (Dkt. 63)
Miller Decl. Exhibit 11: Bates numbered ANT_BARTZ_000004327	Defendant Anthropic PBC	Entirety of the document	Refers to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Revised Stipulated Protective Order (Dkt. 63)

Document	Party Claiming Confidentiality	Portions to Be Filed Under Seal	Anthropic's Basis for Sealing
Miller Decl. Exhibit 12: Bates numbered ANT_BARTZ_000144504-9	Defendant Anthropic PBC	Entirety of the document	Refers to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Revised Stipulated Protective Order (Dkt. 63)
Miller Decl. Exhibit 13: Bates numbered ANT_BARTZ_000029063-29171	Defendant Anthropic PBC	Entirety of the document	Refers to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Revised Stipulated Protective Order (Dkt. 63)
Miller Decl. Exhibit 14	Defendant Anthropic PBC	Entirety of the document	Refers to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Revised Stipulated Protective Order (Dkt. 63)
Miller Decl. Exhibit 15: Bates numbered ANT_BARTZ_000005492	Defendant Anthropic PBC	Entirety of the document	Refers to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Revised Stipulated Protective Order (Dkt. 63)
Miller Decl. Exhibit 16: Bates numbered ANT_BARTZ_000003441-2	Defendant Anthropic PBC	Entirety of the document	Refers to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Revised Stipulated Protective Order (Dkt. 63)

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Miller Decl. Exhibit 17: Bates numbered ANT_BARTZ_000002604	Defendant Anthropic PBC	Entirety of the document	Refers to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Revised Stipulated Protective Order (Dkt. 63)
Miller Decl. Exhibit 18: Bates numbered ANT_BARTZ_000389738-9	Defendant Anthropic PBC	Entirety of the document	Refers to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Revised Stipulated Protective Order (Dkt. 63)
Miller Decl. Exhibit 19: Bates numbered ANT_BARTZ_000389773-5.	Defendant Anthropic PBC	Entirety of the document	Refers to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Revised Stipulated Protective Order (Dkt. 63)
Miller Decl. Exhibit 20: Bates numbered ANT_BARTZ_000391318-20	Defendant Anthropic PBC	Entirety of the document	Refers to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Revised Stipulated Protective Order (Dkt. 63)
Miller Decl. Exhibit 21: Bates numbered ANT_BARTZ_000394794	Defendant Anthropic PBC	Entirety of the document	Refers to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Revised Stipulated Protective Order (Dkt. 63)

Document	Party Claiming Confidentiality	Portions to Be Filed Under Seal	Anthropic's Basis for Sealing
Miller Decl. Exhibit 22: Bates numbered ANT_BARTZ_000034918	Defendant Anthropic PBC	Entirety of the document	Refers to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Revised Stipulated Protective Order (Dkt. 63)
Miller Decl. Exhibit 23: Bates numbered ANT_BARTZ_000006363-90	Defendant Anthropic PBC	Entirety of the document	Refers to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Revised Stipulated Protective Order (Dkt. 63)
Miller Decl. Exhibit 24: Bates numbered ANT_BARTZ_000415587-9, ANT_BARTZ_000415597-9	Defendant Anthropic PBC	Entirety of the document	Refers to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Revised Stipulated Protective Order (Dkt. 63)
Miller Decl. Exhibit 25: Bates numbered ANT_BARTZ_000004936-51	Defendant Anthropic PBC	Entirety of the document	Refers to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Revised Stipulated Protective Order (Dkt. 63)
Miller Decl. Exhibit 26: Bates numbered ANT_BARTZ_000209219-235	Defendant Anthropic PBC	Entirety of the document	Refers to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Revised Stipulated Protective Order (Dkt. 63)

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Miller Decl. Exhibit 32	Defendant Anthropic PBC	Entirety of the document	Refers to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Revised Stipulated Protective Order (Dkt. 63)
Miller Decl. Exhibit 33	Defendant Anthropic PBC	Entirety of the document	Refers to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Revised Stipulated Protective Order (Dkt. 63)
Miller Decl. Exhibit 34	Defendant Anthropic PBC	Entirety of the document	Refers to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Revised Stipulated Protective Order (Dkt. 63)
Miller Decl. Exhibit 35	Defendant Anthropic PBC	Entirety of the document	Refers to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Revised Stipulated Protective Order (Dkt. 63)
Miller Decl. Exhibit 36	Defendant Anthropic PBC	Entirety of the document	Refers to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Revised Stipulated Protective Order (Dkt. 63)

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Miller Decl. Exhibit 37	Defendant Anthropic PBC	Entirety of the document	Refers to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Revised Stipulated Protective Order (Dkt. 63)
Miller Decl. Exhibit 38	Defendant Anthropic PBC	Entirety of the document	Refers to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Revised Stipulated Protective Order (Dkt. 63)

For the foregoing reasons, Plaintiffs respectfully request a Court determination of whether or not these documents should remain sealed.

Dated: March 27, 2025

Respectfully submitted,

/s/ Rachel Geman

Rachel Geman

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