

Justin A. Nelson (*Pro Hac Vice*)
 Alejandra C. Salinas (*Pro Hac Vice*)
 Collin Fredricks (*Pro Hac Vice*)
SUSMAN GODFREY L.L.P.
 1000 Louisiana Street, Suite 5100
 Houston, TX 77002-5096
 Telephone: (713) 651-9366
 jnelson@susmangodfrey.com
 asalinas@susmangodfrey.com
 cfredricks@susmangodfrey.com

Rohit D. Nath (SBN 316062)
SUSMAN GODFREY L.L.P.
 1900 Avenue of the Stars, Suite 1400
 Los Angeles, CA 90067-2906
 Telephone: (310) 789-3100
 RNath@susmangodfrey.com

Jordan W. Connors (*Pro Hac Vice*)
SUSMAN GODFREY L.L.P.
 401 Union Street, Suite 3000
 Seattle, WA 98101
 Telephone: (206) 516-3880
 jconnors@susmangodfrey.com

J. Craig Smyser (*Pro Hac Vice*)
SUSMAN GODFREY L.L.P.
 One Manhattan West, 51st Floor,
 New York, NY 10019
 Telephone: (212) 336-8330
 csmyser@susmangodfrey.com

Proposed Co-Lead Counsel

Rachel Geman (*Pro Hac Vice*)
 Jacob S. Miller (*Pro Hac Vice*)
 Danna Z. Elmasry (*Pro Hac Vice*)
**LIEFF CABRASER HEIMANN
 & BERNSTEIN, LLP**
 250 Hudson Street, 8th Floor
 New York, New York 10013-1413
 Telephone: (212) 355-9500
 rgeman@lchb.com
 jmiller@lchb.com
 delmasry@lchb.com

Daniel M. Hutchinson (SBN 239458)
 Reilly T. Stoler (SBN 310761)
**LIEFF CABRASER HEIMANN
 & BERNSTEIN, LLP**
 275 Battery Street, 29th Floor
 San Francisco, CA 94111-3339
 Telephone: (415) 956-1000
 dhutchinson@lchb.com
 rstoler@lchb.com

Proposed Co-Lead Counsel

Scott J. Sholder (*Pro Hac Vice*)
 CeCe M. Cole (*Pro Hac Vice*)
**COWAN DEBAETS ABRAHAMS
 & SHEPPARD LLP**
 60 Broad Street, 30th Floor
 New York, New York 10010
 Telephone: (212) 974-7474
 ssholder@cdas.com
 ccole@cdas.com

Additional Counsel for the Class

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

ANDREA BARTZ, ANDREA BARTZ, INC.,) Case No.: 3:24-cv-05417-WHA
 CHARLES GRAEBER, KIRK WALLACE)
 JOHNSON, and MJ + KJ, INC., individually)
 and on behalf of others similarly situated,)

Plaintiffs,)

v.)

ANTHROPIC PBC,)

Defendants.)

**DECLARATION OF JACOB S. MILLER
 IN SUPPORT OF CLASS
 CERTIFICATION**

1 I, Jacob S. Miller, declare:

2 1. I am an attorney in the law firm of Lieff, Cabraser, Heimann & Bernstein, LLP,
3 counsel for Plaintiffs in the above-captioned case. I am a member of the State Bar of New York
4 and am admitted to practice before this Court *pro hac vice*. I make this declaration based on my
5 own personal knowledge. If called upon to testify, I could and would testify competently to the
6 truth of the matters stated herein.

7 2. Since the start of discovery on October 10, 2024, Anthropic has produced 27,807
8 documents. A majority of these documents were produced on March 20, 2025, in Anthropic's 7th
9 production, ANT_BARTZ_007, which contained 18,968 documents.

10 3. Attached as **Exhibit 1** are true and correct copies of Anthropic PBC's First
11 Supplemental Objections and Responses to Plaintiffs' First Set of Interrogatories (Nos. 1-5),
12 served by Anthropic PBC on March 20, 2025.

13 4. Attached as **Exhibit 2** are true and correct copies of Anthropic PBC's Second
14 Supplemental Objections and Responses to Plaintiffs' Second Set of Interrogatories (Nos. 6-13),
15 served by Anthropic PBC on March 20, 2025.

16 5. Attached as **Exhibit 3** are true and correct copies of Anthropic PBC's First
17 Supplemental Objections and Responses to Plaintiffs' Third Set of Interrogatories (Nos. 14-17),
18 served by Anthropic PBC on March 20, 2025.

19 6. Attached as **Exhibit 4** are true and correct copies of Anthropic PBC's First
20 Supplemental Objections and Responses to Plaintiffs' First Set of Requests for Admissions (Nos.
21 1-15), served by Anthropic PBC on March 20, 2025.

22 7. Attached as **Exhibit 5** are true and correct copies of Anthropic PBC's First
23 Supplemental Objections and Responses to Plaintiffs' Second Set of Requests for Admissions
24 (Nos. 16-17), served by Anthropic PBC on March 20, 2025.

25 8. Attached as **Exhibit 6** are true and correct copies of excerpts of the Deposition of
26 Pranay Sangani, taken on November 11, 2024.

27 9. Attached as **Exhibit 7** is a true and correct copy of a handout provided by
28 Anthropic PBC at the Deposition of Pranay Sangani.

1 10. Attached as **Exhibit 8** is a true and correct copy of a document titled, “[REDACTED]
2 [REDACTED],” produced by Anthropic PBC as ANT_BARTZ_000003492-3.

3 11. Attached as **Exhibit 9** is a true and correct copy of a document titled, “[REDACTED]
4 [REDACTED],” produced by Anthropic PBC as
5 ANT_BARTZ_000004587-8.

6 12. Attached as **Exhibit 10** is a true and correct copy of a document titled, “Anthropic
7 [REDACTED],” produced by Anthropic PBC as
8 ANT_BARTZ_000004031-7.

9 13. Attached as **Exhibit 11** is a true and correct copy of a screenshot from the
10 document titled, [REDACTED],” produced
11 by Anthropic PBC as ANT_BARTZ_000004327.

12 14. Attached as **Exhibit 12** is a true and correct copy of a document titled, “[REDACTED]
13 [REDACTED],” produced by Anthropic PBC as
14 ANT_BARTZ_000144504-9.

15 15. Attached as **Exhibit 13** is a true and correct copy of a document titled,
16 “[REDACTED],” produced by Anthropic PBC as ANT_BARTZ_000029063-29171.

17 16. Attached as **Exhibit 14** is a true and correct copy of [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED].

21 17. Attached as **Exhibit 15** is a true and correct copy of a document titled, “[REDACTED]
22 [REDACTED],” produced by Anthropic PBC as ANT_BARTZ_000005492.

23 18. Attached as **Exhibit 16** is a true and correct copy of a document titled, “[REDACTED]
24 [REDACTED],” produced by Anthropic PBC as ANT_BARTZ_000003441-2.

25 19. Attached as **Exhibit 17** is a true and correct copy of a document titled, “[REDACTED]
26 [REDACTED],” produced by Anthropic PBC as
27 ANT_BARTZ_000002604.
28

1 20. Attached as **Exhibit 18** is a true and correct copy of a document titled,
2 “[REDACTED],” produced by Anthropic PBC as
3 ANT_BARTZ_000389738-9.

4 21. Attached as **Exhibit 19** is a true and correct copy of a document titled,
5 “[REDACTED],” produced by Anthropic PBC as
6 ANT_BARTZ_000389773-5.

7 22. Attached as **Exhibit 20** is a true and correct copy of a document titled,
8 “[REDACTED],” produced by Anthropic PBC as
9 ANT_BARTZ_000391318-20.

10 23. Attached as **Exhibit 21** is a true and correct copy of a document titled,
11 “Anthropic_sheer-notebook-10022022.htm,” produced by Anthropic PBC as
12 ANT_BARTZ_000394794.

13 24. Attached as **Exhibit 22** is a true and correct copy of a document titled, “[REDACTED]
14 [REDACTED],” produced by Anthropic PBC as ANT_BARTZ_000034918.

15 25. Attached as **Exhibit 23** is a true and correct copy of a document titled, “[REDACTED]
16 [REDACTED]
17 [REDACTED],” produced by
18 Anthropic PBC as ANT_BARTZ_000006363-90.

19 26. Attached as **Exhibit 24** is a true and correct copy of a document titled, “[REDACTED]
20 [REDACTED],” produced by Anthropic PBC as
21 ANT_BARTZ_000415587-9, as well as the attached photographs titled, “IMG_1459.jpg,”
22 “IMG_1455.jpg,” and “IMG_1451.jpg,” produced by Anthropic PBC as
23 ANT_BARTZ_000415597-9.

24 27. Attached as **Exhibit 25** is a true and correct copy of a document titled, “[REDACTED]
25 [REDACTED],” produced by Anthropic PBC as ANT_BARTZ_000004936-51.

26 28. Attached as **Exhibit 26** is a true and correct copy of a document titled, “[REDACTED]
27 [REDACTED],” produced by Anthropic PBC as ANT_BARTZ_000209219-235.

1 29. Attached as **Exhibit 27** are true and correct copies of excerpts of the Deposition of
2 the deposition of Andrea Bartz and Andrea Bartz, Inc., taken on March 7, 2025.

3 30. Attached as **Exhibit 28** are true and correct copies of excerpts of the Deposition
4 of the deposition of Charles Graeber, taken on March 5, 2025.

5 31. Attached as **Exhibit 29** are true and correct copies of excerpts of the Deposition of
6 the deposition of Kirk Wallace Johnson and MJ+KJ, Inc., taken on March 6, 2025.

7 32. Attached as **Exhibit 30** are true and correct copies of the copyright registrations of
8 the class representatives' books registered with the U.S. Copyright Office, produced by Plaintiffs
9 as BARTZ_000004693-4708, as well as true and correct copies of documents on file with the
10 Copyright Office showing the assignment and transfer of ownership of one work written by
11 Plaintiff Kirk Wallace Johnson to Plaintiff MJ + KJ, produced by Plaintiffs as
12 BARTZ_000004690-92.

13 33. Attached as **Exhibit 31** are true and correct copies of excerpts of a transcript of
14 Proceedings Held before the Court on February 25, 2025.

15 34. Attached as **Exhibit 32** is a true and correct copy of a [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED].

19 35. Attached as **Exhibit 33** is a true and correct copy of a [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED].

24 36. Attached as **Exhibit 34** is a true and correct copy of a [REDACTED]
25 [REDACTED]
26 [REDACTED].

1 37. Attached as **Exhibit 35** is a true and correct copy of an [REDACTED]

2 [REDACTED]

3 [REDACTED].

4 38. Attached as **Exhibit 36** is a true and correct copy of an [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED].

8 39. Attached as **Exhibit 37** is a true and correct copy of a [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED].

13 40. Attached as **Exhibit 38** is a true and correct copy of a [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED].

18 41. Attached as **Exhibit 39** is a true and correct copy of a Nov. 19, 2024 post on the

19 Authors Guild website entitled *HarperCollins AI Licensing Deal*, accessed by Plaintiffs on March

20 27, 2025 at this URL: <https://authorsguild.org/news/harpercollins-ai-licensing-deal/>.

21 I declare under penalty of perjury that the foregoing is true and correct.

22 Executed this 27th day of March, 2025 in New York, NY.

23

24 /s/ Jacob S. Miller

25 Jacob S. Miller

26

27

28

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing and all documents attached hereto were served March 27, 2025 upon counsel of record via service by ECF.

/s/ Rachel Geman
Rachel Geman