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Attorneys for Defendant ANTHROPIC PBC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ANDREA BARTZ, ANDREA BARTZ, INC.,
CHARLES GRAEBER, KIRK WALLACE
JOHNSON, and MJ + KJ, INC., individually and on
behalf of others similarly situated,

Plaintiffs,

v.

ANTHROPIC PBC,

Defendant.

Case No. 3:24-CV-05417-WHA

Action Filed: August 19, 2024

**DEFENDANT ANTHROPIC PBC'S
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE
SEALED**

Date: May 15, 2025

Time: 8:00 a.m.

Place: Courtroom 12, 19th Floor

Judge: Honorable William H. Alsup

1 Pursuant to Civil Local Rules 7-11 and 79-5(f), Defendant Anthropic PBC (“Anthropic”)
2 moves to maintain under seal Exhibits 47-49, attached to the Declaration of Douglas A. Winthrop
3 in Support of Defendant Anthropic PBC’s Reply in Support of Motion for Summary Judgment
4 (“Winthrop Reply Decl.”), which were designated under the Protective Order as protected material
5 by another party or non-party (the “Designating Party”). Anthropic also moves to maintain under
6 seal limited portions of Anthropic’s Reply in Support of Motion for Summary Judgment and
7 supporting Supplemental Declaration of Steven R. Peterson, which cites to material designated
8 under the Protective Order as protected material by the “Designating Party.”

9 Civil Local Rule 79-5(f) requires that a filing party “identify each document or portions
10 thereof for which sealing is sought.” Civil L.R. 79-5(f)(1). “Within 7 days of the motion’s filing,
11 the Designating Party must file a statement and/or declaration as described in subsection (c)(1).”
12 Civil L.R. 79-5(f)(3). Pursuant to these rules, Anthropic identifies portions of the documents listed
13 below, and filed concurrently herewith, that may contain information Plaintiffs designated
14 Confidential or Highly Confidential Attorneys’ Eyes Only under the terms of the Stipulated
15 Protective Order. Anthropic takes no position as to the confidentiality of the information that
16 Plaintiffs requested be filed under seal pursuant to the Protective Order. Rather, Anthropic
17 respectfully requests that this information be sealed provisionally.

Document	Portions to Seal	Designating Party	Reason
Anthropic's Reply in Support of Motion for Summary Judgment	Portions highlighted in blue at 12:9-11	HarperCollins	Cites Winthrop Declaration in Support of Anthropic's Opposition to Plaintiffs' Motion for Class Certification, Ex. 42 (ECF No. 147-27).
Supplemental Declaration of Steven R. Peterson in Support of Anthropic's Motion for Summary Judgment	Portions highlighted in blue at ¶ 11	HarperCollins	Cites Exhibits 47-49 and Winthrop Declaration in Support of Anthropic's Opposition to Plaintiffs' Motion for Class Certification, Ex. 42 (ECF No. 147-27).
Winthrop Reply Decl., Ex. 47, Email, marked as HC004_ANT0004027	Entire Document	HarperCollins	Refers to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Revised Stipulated Protective Order (ECF No. 63)
Winthrop Reply Decl., Ex. 48, Email, marked as HC004_ANT0003890	Entire Document	HarperCollins	Refers to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Revised Stipulated Protective Order (ECF No. 63)
Winthrop Reply Decl., Ex. 49, Email, marked as HC004_ANT0003864	Entire Document	HarperCollins	Refers to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Revised Stipulated Protective Order (ECF No. 63)

For the foregoing reasons, Anthropic respectfully requests that this Court grant this administrative motion.

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2 Dated: May 8, 2025

Respectfully submitted,

3 **ARNOLD & PORTER KAYE SCHOLER LLP**

4 By: /s/ Douglas A. Winthrop
DOUGLAS A. WINTHROP

5 *Attorneys for Defendant*
6 ANTHROPIC PBC
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CERTIFICATE OF SERVICE

I am a resident of the State of California, over the age of eighteen years and not a party to the within-entitled action; my business address is Three Embarcadero Center, Tenth Floor, San Francisco, California 94111-4024. On May 1, 2025, the foregoing **DEFENDANT ANTHROPIC PBC's ADMINISTRATIVE MOTION TO FILE DOCUMENTS UNDER SEAL**., and exhibits thereto were electronically served on the following:

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24 I declare under penalty of perjury under the laws of the State of California and the United
25 States of America that the foregoing is true and correct. Executed May 8, 2025 at Palo Alto,
26 California.

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/s/ Sherri Mills
Sherri Mills