

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
 csmysr@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)	PLAINTIFFS' ADMINISTRATIVE
and on behalf of others similarly situated,)	MOTION TO FILE DOCUMENTS
)	UNDER SEAL
Plaintiffs,)	
)	
v.)	
)	
ANTHROPIC PBC,)	
)	
Defendants.)	

Under Civil Local Rules 7-11 and 79-5, Plaintiffs move to maintain under seal minimal portions of documents that are the subject of Anthropic’s Administrative Motion to Consider Whether Another Party’s Material Should Be Sealed (Dkt. 147). Plaintiffs have significantly pared down this sealing request. While plaintiffs previously requested retaining these documents under seal entirely, Plaintiffs now only request redactions of the yellow highlighted portions. Specifically, Plaintiffs seek to seal a single reference to a Plaintiff’s Employer Identification Number (“EIN”) and the exact dollar amounts of advances and payments in Plaintiffs’ publishing and licensing agreements.

I. LEGAL STANDARD

With the exception of a narrow range of documents that are “traditionally kept secret,” courts begin their sealing analysis with “a strong presumption in favor of access.” *Foltz v. State Farm Mut. Auto. Ins.*, 331 F.3d 1122, 1135 (9th Cir. 2003). Access to motions and their attachments that are “more than tangentially related to the merits of a case” may be sealed only upon a showing of “compelling reasons” for sealing. *Ctr. for Auto Safety v. Chrysler Grp., LLC*, 809 F.3d 1092, 1101–02 (9th Cir. 2016). “Filings that are only tangentially related to the merits may be sealed upon a lesser showing of ‘good cause.’” *Dekker v. Vivint Solar, Inc.*, 2022 WL 1422565, at *1 (N.D. Cal. May 5, 2022) (*citing id.* at 1097).

II. PLAINTIFFS’ REASONS FOR SEALING

Plaintiffs’ proposed narrowed sealing is warranted for at least two reasons.

First, Plaintiffs seek to seal highly sensitive personally identifiable information and the monetary terms of highly confidential publishing and licensing agreements. Courts routinely hold that certain financial information—in this case a specific payment term—warrants sealing. *See, e.g., Pryor v. City of Clearlake*, 2012 WL 3276992, at *4-5 (N.D. Cal. Aug. 9, 2012) (granting motion to seal a party’s personal financial information, including information about the party’s salary); *Dangaard v. Instagram, LLC*, 2023 WL 6851697, at *3 (N.D. Cal. Oct. 17, 2023) (“dollar amounts that are specific terms of contractor agreements usually kept confidential may also be redacted, but only the numbers”). Additionally, an employee identification number is paradigmatic of highly personal information. *See UnifySCC v. Cody*, 2023 WL 7170265, at *1

(N.D. Cal. Oct. 30, 2023) (granting a motion to seal “because employee identification numbers are personally identifying information that can be used to obtain other sensitive information”). Plaintiffs have a legitimate privacy interest in redacting private financial information. For an EIN, the disclosure of this information could put the Plaintiff at risk of potential fraud. For dollar amounts, disclosure could impact Plaintiffs’ ability to negotiate for advances in future contracts. Moreover, this updated request is narrowly tailored because there are only a few lines in a limited number of documents with specific dollar amounts that require any redaction at all. There is no less restrictive alternative because the redactions are limited to the dollar amounts and the EIN. Notably, Plaintiffs do not seek to seal *any* part of Anthropic’s class certification opposition brief (or, indeed, any of its briefing or substantive declarations).

Second, the information Plaintiffs seek to seal has nothing to do with any Rule 23 issue and would therefore not in any way limit the public’s ability to evaluate the merits of the parties’ arguments for and against class certification. The exact amount of a book advance or an EIN has nothing to do with Anthropic’s admittedly common book acquisition and book use practices, and nothing to do with class notice or class member identification. Anthropic generally cites these documents in support of its arguments regarding copyright ownership. Dkt. 146-7 at 3-6. Neither the EIN nor the dollar amounts relate to this issue.

Thus, Plaintiffs’ narrowly-tailored request should be granted because it is limited to highly sensitive personal information about compensation and is not in any way related to the merits of the motion in which the information was included. For the Court’s convenience, the proposed information to be sealed is below.¹

ECF	Document	Portions to Seal
147-2	Ex. 5, Publishing Agreement, marked as BARTZ000004755-4782	Portions highlighted in yellow on pages 2 and 5
147-3	Ex. 6, Publishing Agreement, marked as BARTZ000003427-3454	Portions highlighted in yellow on page 3

¹ The proposed portions to seal and corresponding Bates numbers for each page can be found in the Declaration of Jacob S. Miller in Support of Plaintiffs’ Administrative Motion to File Under Seal.

ECF	Document	Portions to Seal
147-4	Ex. 7, Publishing Agreement, marked as BARTZ000005288-5307	Portions highlighted in yellow on pages 2 and 4.
147-5	Ex. 9, Option/Purchase Agreement, marked as BARTZ000003547-74	Portions highlighted in yellow on pages 2-6, 14, 23
147-11	Ex. 17, Publishing Agreement, marked as BARTZ000000207-24	Portions highlighted in yellow on page 3.
147-12	Ex. 18, Publishing Agreement, marked as BARTZ000000225-41	Portions highlighted in yellow on pages 3 and 4
147-16	Ex. 22, Modification of Option/Purchase Agreement, marked as BARTZ000004621-72	Portions highlighted in yellow on pages 3, 9-10, 12-13, 40
147-18	Ex. 27, Royalty Statement, marked as BARTZ000000599-604	Portions highlighted in yellow on page 2
147-19	Ex. 28, Royalty Statement, marked as BARTZ000000961-64	Portions highlighted in yellow on page 2
147-20	Ex. 29, Royalty Statement, marked as BARTZ000001288-91	Portions highlighted in yellow on page 2
147-21	Ex. 30, Publishing Agreement, marked as BARTZ000004875-4899	Portions highlighted in yellow on page 6
147-22	Ex. 31, Publishing Agreement, marked as BARTZ000005520- 5533	Portions highlighted in yellow on page 5
147-23	Ex. 32, Publishing Agreement, marked as BARTZ000004841-4860	Portions highlighted in yellow on pages 2-3
147-24	Ex. 33, Option Agreement, marked as BARTZ000000088-93	Portions highlighted in yellow on page 4

For the foregoing reasons, Plaintiffs respectfully request that these specific portions of documents remain sealed.

1 Dated: May 21, 2025

Respectfully submitted,

2 /s/ Rachel Geman

3 Rachel Geman

4 Rachel Geman (*Pro Hac Vice*)
5 Jacob S. Miller (*Pro Hac Vice*)
6 Danna Z. Elmasry (*Pro Hac Vice*)
7 **LIEFF CABRASER HEIMANN**
8 **& BERNSTEIN, LLP**
9 250 Hudson Street, 8th Floor
New York, New York 10013-1413
Telephone: (212) 355-9500
rgeman@lchb.com
jmillier@lchb.com
delmasry@lchb.com

10 Daniel M. Hutchinson (SBN 239458)
11 Reilly T. Stoler (SBN 310761)
12 **LIEFF CABRASER HEIMANN**
13 **& BERNSTEIN, LLP**
14 275 Battery Street, 29th Floor
San Francisco, CA 94111-3339
Telephone: (415) 956-1000
dhutchinson@lchb.com
rstoler@lchb.com

15 *Proposed Co-Lead Counsel*

16 Justin A. Nelson (*Pro Hac Vice*)
17 Alejandra C. Salinas (*Pro Hac Vice*)
18 Collin Fredricks (*Pro Hac Vice*)
19 **SUSMAN GODFREY L.L.P.**
20 1000 Louisiana Street, Suite 5100
Houston, TX 77002-5096
Telephone: (713) 651-9366
jnelson@susmangodfrey.com
asalinas@susmangodfrey.com
cfredricks@susmangodfrey.com

21 Rohit D. Nath (SBN 316062)
22 **SUSMAN GODFREY L.L.P.**
23 1900 Avenue of the Stars, Suite 1400
Los Angeles, CA 90067-2906
Telephone: (310) 789-3100
RNath@susmangodfrey.com

24 Jordan W. Connors (*Pro Hac Vice*)
25 **SUSMAN GODFREY L.L.P.**
26 401 Union Street, Suite 3000
Seattle, WA 98101
Telephone: (206) 516-3880
jconnors@susmangodfrey.com

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

7 *Proposed Co-Lead Counsel*

8 Scott J. Sholder (*Pro Hac Vice*)
9 CeCe M. Cole (*Pro Hac Vice*)
10 **COWAN DEBAETS ABRAHAMS**
11 **& SHEPPARD LLP**
12 60 Broad Street, 30th Floor
13 New York, New York 10010
14 Telephone: (212) 974-7474
15 sshoulder@cdas.com
16 ccole@cdas.com

17 *Additional Counsel for the Class*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing and all documents attached hereto were served May 21, 2025 upon counsel of record via service by ECF.

/s/ Rachel Geman
Rachel Geman