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July 1, 2025

Hon. William H. Alsup
Phillip Burton Federal Building & U.S. Courthouse
450 Golden Gate Avenue, 16th Floor Clerk's Office
San Francisco, CA 94102

Re: **Anthropic's Further Response to Plaintiffs' Letter Motion to Compel
Additional Custodians and Compensation Documents in *Bartz, et al. v.*
Anthropic PBC, No. 3:24-cv-05417-WHA (D.I. 227)**

Dear Judge Alsup:

We write to follow up regarding Plaintiffs' letter motion to compel (i) the addition of five ESI custodians and (ii) the production compensation documents for its document custodians (Dkt. 227), which Anthropic has opposed (Dkt. 232).

Anthropic notifies the Court, after further consideration, the scope of the dispute about custodians has been narrowed: Anthropic will agree to add three of the five ESI custodians: (1) Daniela Amodei, (2) Danny Hernandez, and (3) Sam McCandlish. That is, Anthropic agrees to collect and produce documents from these three custodians per the parties' agreements on ESI search terms. Anthropic maintains its opposition as to Chris Olah and Jack Clark.

Anthropic also maintains its opposition as to Plaintiffs' separate request for compensation information for all custodians.

Sincerely,

/s/ Joseph Farris

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CERTIFICATE OF SERVICE

I, Joseph Farris, am the ECF user whose identification and password are being used to file the foregoing **ANTHROPIC'S FURTHER RESPONSE TO PLAINTIFFS' LETTER MOTION TO COMPEL RE COSTODIANS.**

Dated: July 1, 2025

/s/ Joseph Farris
Joseph Farris