

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

ANDREA BARTZ and KIRK WALLACE
JOHNSON, individually, and ANDREA
BARTZ, INC., CHARLES GRAEBER, and
MJ + KJ, INC., individually and as
representatives of the class,

Plaintiffs,

v.

ANTHROPIC PBC,

Defendant.

No. C 24-05417 WHA

**REQUEST FOR INFORMATION
RE THIRD-PARTY
COMMUNICATIONS**

With respect to the pending privilege dispute involving third-party communications (Dkt. No. 223, Part I), the record is incomplete on at least the following points (Dkt. Nos. 230, 264):

1. A declaration attests that six public relations firms each received various communications. It does not attest that no one else did.
2. A declaration attests that all six of these firms have entered written agreements that bar them from unauthorized disclosure of Anthropic confidential information. It does not attach the agreements, state the date entered, nor state that no disclosures were ever authorized.
3. No declaration attests to whether the public relations firms' people with access to the documents were bound by direct agreements or else by a sequence of agreements, instructions, or so on to keep confidentiality.
4. With rare exception, we lack information about even the number of people at each firm, the number furthermore working on Anthropic projects, and the number with access.

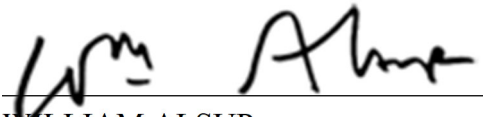
1 5. There is some discussion of when each document was made. There is less about
2 when and why each was shared — which appears not always to have been the same thing.

3 6. The access permissions for the Google Docs are not specified.

4 Upon further review of its submissions, defendant might identify other gaps. Now is the
5 time for defendant to cure any and all that could count. Please do so by **5:00 P.M. THURSDAY.**

6 **IT IS SO ORDERED.**

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8 Dated: August 11, 2025.

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11 WILLIAM ALSUP
12 UNITED STATES DISTRICT JUDGE
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