

1 Michael S. Kwun (SBN 198945)
mkwun@kblfirm.com
2 KWUN BHANSALI LAZARUS LLP
555 Montgomery Street, Suite 750
3 San Francisco, CA 94111
(415) 630-2350

4 Attorneys for Non-Party
5 OPENAI, INC.
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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
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11 ANDREA BARTZ, CHARLES GRAEBER,
and KIRK WALLACE JOHNSON,
12 individually and on behalf of others similarly
situated,

13 Plaintiffs,

14 v.
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16 ANTHROPIC PBC,

17 Defendant.
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Case No. 3:24-cv-05417-WHA

**NON-PARTY OPENAI, INC.'S
RESPONSE TO PLAINTIFFS'
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE
SEALED (DKT. NO. 285)**

1 On August 7, 2025, Plaintiffs filed an Administrative Motion to Consider Whether
2 Another Party's Material Should Be Sealed (Dkt. No. 285, the "Sealing Motion").

3 Non-Party OpenAI does not contend that the Court should maintain under seal the
4 excerpts from the transcript of the deposition of Benjamin Mann that are attached as Exhibit D
5 (Dkt. No. 285-7) to the Declaration of Rachel J. Geman (Dkt. No. 285-2). OpenAI does not
6 contend that the Court should, due to references to material from Exhibit D to the
7 Geman Declaration, maintain under seal portions of the Plaintiffs' Brief in Response to
8 Anthropic's Response to the Court's Order to Show Cause (Dkt. No. 285-3) that reference
9 material from Exhibit D.

10 OpenAI otherwise takes no position on the Sealing Motion.

11 Respectfully submitted,

12 KWUN BHANSALI LAZARUS LLP
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14 Dated: August 12, 2025

By: /s/ Michael S. Kwun

15 Michael S. Kwun (SBN 198945)
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