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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ANDREA BARTZ, CHARLES GRAEBER,,
AND KIRK WALLACE JOHNSON

Plaintiffs,

v.

ANTHROPIC PBC,

Defendant.

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

Action Filed: August 19, 2024

**ANTHROPIC'S RESPONSE TO
PLAINTIFFS' MOTION TO APPROVE
CLASS NOTICE**

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1 Pursuant to ECF Nos. 330 and 332, Anthropic PBC (“Anthropic”) respectfully submits
2 this response to Plaintiffs’ Motion to Approve Class Notice (ECF No. 317).

3 Anthropic incorporates by reference and in full its August 18, 2025 response to Plaintiffs’
4 Motion (ECF No. 329). In light of the Court’s allowance for Anthropic to provide “any further
5 objections” (ECF No. 332), Anthropic responds that it lacks the necessary information to properly
6 evaluate the notice plan and requested that information from Plaintiffs on August 18, 2025.
7 Specifically, it requested by email that Plaintiffs provide by August 22, 2025 the underlying data
8 supporting their representations regarding potential class member identification and outreach
9 methodology (Exhibit 1). Anthropic needs this information to properly evaluate the notice plan’s
10 scope and effectiveness, and it objects to notice going out before Anthropic receives this
11 information and has an opportunity to assess it.

12 Plaintiffs’ proposed plan also contemplates notices being sent out starting September 1,
13 2025—the same day their proposed class list is due. Anthropic objects to notice going out
14 without any meaningful opportunity to respond to and challenge the proposed class list, including
15 by filing a Daubert motion challenging Plaintiffs’ expert methodology. *See* Class Certification
16 Order, ECF No. 244 at 17 n.3 (plaintiffs’ methods “must withstand *Daubert* and defendants’
17 exacting scrutiny”). Sending class notices that may be inaccurate serves no one—neither the
18 absent class members nor Anthropic. Therefore, Anthropic should be permitted to evaluate and
19 rebut the accuracy of the list before notices are issued.

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21 Dated: August 20, 2025

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23 By: 
24 Daralyn J. Durie

25 *Attorneys for Defendant*
26 ANTHROPIC PBC
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