

# Exhibit 1

**From:** [Winthrop, Douglas A.](#)  
**To:** [Craig Smyser](#); [xServiceListAnthropic](#)  
**Cc:** [Anthropic PBC-AI-TT](#); [xAnthropic Bartz Litigation](#); [MoFo Team Anthropic Bartz](#)  
**Subject:** Request for information related to Plaintiffs' Class Notice Motion  
**Date:** Monday, August 18, 2025 5:39:35 PM  
**Attachments:** [image001.png](#)

---

**External Email**

 **This message needs your attention**

- Someone new is on this email. [team\\_anthropic\\_bartz@mofo.com](#), [douglas.winthrop@arnoldporter.com](#) and 1 more recipients added.

[Report this Email or Mark as Safe](#) Powered by Mimecast

Counsel –

So that we can properly evaluate your proposed notice plan, we request that you provide us with non-privileged information in the following categories by Friday, August 22, 2025:

1. All communications, documents and data upon which you relied in making the various factual assertions contained in your Motion to Approve Class Notice (“Motion”), including, without limitation, with regard to your “steps to compile relevant contact information and inform stakeholders of this class action lawsuit,” including class members and publishers, as represented to the Court on page 2 of your Motion.
2. All of your communications with JND and any of the administrators you considered retaining, including, without limitation, the notice proposals and information or requirements provided to or received from JND.
3. All of your communications with “leading author organizations, literary agencies, and agent organizations” regarding obtaining author contact information, as represented to the Court on page 2 of your Motion and in Paragraph 13 of the Hutchinson Declaration in support of your Motion, including, without limitation, Authors Guild, Authors Registry, William Morris Endeavor, CAAICM, Writers House, Association of American Literary Agents, Dramatists Guild, Novelists, Inc., Romance Writers, and Sisters in Crime.
4. All communications, documents, and data on which you are relying for the

contention made on page 8 or your Motion that *Publishers Weekly*, *The Atlantic*, *Ars Technica* and other publications through which Plaintiffs propose to disseminate notice “are likely read by class members and/or discuss issues addressed in this lawsuit.”

Thank you.

Doug

Douglas A. Winthrop

Partner | [Bio](#)



Three Embarcadero Center | 10th Floor

San Francisco, CA 94111-4024

T: +1 415.471.3174

[Douglas.Winthrop@arnoldporter.com](mailto:Douglas.Winthrop@arnoldporter.com)

[www.arnoldporter.com](http://www.arnoldporter.com) | [LinkedIn](#)

---

This communication may contain information that is legally privileged, confidential or exempt from disclosure. If you are not the intended recipient, please note that any dissemination, distribution, or copying of this communication is strictly prohibited. Anyone who receives this message in error should notify the sender immediately by telephone or by return e-mail and delete it from his or her computer.

For more information about Arnold & Porter, click here:

<http://www.arnoldporter.com>