

VIA ECF AND MAIL

Special Master Harold J. McElhinny
1664 Ninth Ave.
San Francisco, CA 94122

RE: *Bartz et al. v. Anthropic PBC*, No. 3:24-CV-05417-WHA (N.D. Cal.)
Plaintiffs' Letter Motion to Compel 30(b)(6) Depositions

Dear Special Master McElhinny:

Plaintiffs request an order compelling Anthropic to re-open the recent 30(b)(6) depositions of Ben Mann and Sarah Rodriguez for a total of three hours to address: (i) Anthropic's document repositories and retention; [REDACTED]

Anthropic agreed to prepare Mr. Mann and Ms. Rodriguez to testify about these topics but failed to do so, as Mr. Mann and Ms. Rodriguez repeatedly refused to provide any substantive response to Plaintiffs' questions. Plaintiffs are filing this motion as soon as practicable given the recency of the depositions and the parties' subsequent meet-and-confer efforts (Mr. Mann was deposed on August 15 and August 18, while Ms. Rodriguez was deposed on August 25).

DISCUSSION

Document Repositories and Retention. Anthropic designated Sarah Rodriguez as its representative to testify regarding the [REDACTED]

¹ Plaintiffs have sought a 30(b)(6) deposition on discovery for months. Plaintiffs first requested a deposition on these issues on June 11. On July 2, Plaintiffs requested that Anthropic "provide times as soon as practicable" for a deposition on discovery. Anthropic called the request "premature." On August 6, after multiple meet and confers, Anthropic finally designated a witness, but did not provide a date. On August 19, after all other Rule 30(b)(6) depositions had taken place, Anthropic informed Plaintiffs that the witness would be available on August 25.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

In light of Anthropic's failure to prepare its corporate designees appropriately, Plaintiffs respectfully request that the Special Master re-open the recent 30(b)(6) depositions of Ben Mann and Sarah Rodriguez for a total of three hours to discuss the issues identified above.

³ In a subsequent meet-and-confer meeting on August 25, counsel for Anthropic informed Plaintiffs that Anthropic may supplement its interrogatory responses to explain whether such access logs have been retained. Absent that supplementation, however, Plaintiffs are not in a position to withdraw this request. And given the timelines of fact discovery in the case, Plaintiffs are compelled to file the instant motion.

Respectfully submitted,

/s/ Samir Doshi

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