

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

ANDREA BARTZ, ANDREA BARTZ, INC.,) Case No.: 3:24-cv-05417-WHA
CHARLES GRAEBER, KIRK WALLACE)
JOHNSON, and MJ + KJ, INC., individually)
and on behalf of others similarly situated,)
Plaintiffs,)
v.)
ANTHROPIC PBC,)
Defendants.)

DECLARATION OF PETER M. BERKERY, JR. IN SUPPORT OF PRELIMINARY APPROVAL OF CLASS SETTLEMENT

I, Peter M. Berkery, Jr. declare and state as follows:

1. I am the Executive Director of the Association of University Presses (“AUPresses”), a non-profit trade organization that represents the interests of more than 160 non-profit scholarly publishers. Among other things, AUPresses advocate for the fundamental role of scholarly publishing in achieving academic excellence and in cultivating and disseminating knowledge.

2. Our university press members are mission-driven, non-profit publishers charged with serving the public good by generating and disseminating knowledge. An extension of their parent institutions, university presses acquire, develop, produce, market and sell books and journals of scholarly, intellectual, or creative merit. These books typically provide an in-depth study of a single, specialized topic and/or focus on issues of regional community interest. University presses own or control the exclusive right to reproduce their works, with authors receiving negotiated royalties.

3. I have been in regular contact with the Publishers' Coordination Counsel ("PCC") about developments in this litigation, including the proposed settlement. I also understand that

many of AUPresses' members have works included in the Works List. In furtherance of ensuring notice to class members who are part of AUPresses, I have provided the PCC with contact information for university press directors who are well-positioned to assist with the collection of author contact information.

4. If the Court preliminarily approves the settlement, AUPresses will share notice of the settlement with its members, including by posting a link to the Settlement Website and court-approved notice to its website.

5. AUPresses will also use its contacts with wider industry stakeholders to raise awareness of the notice of settlement, and encourage its members to share notice with their contacts in the publishing and writing industries.

I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on September 20, 2025 at Bethany Beach, Delaware.

Executed on September 20, 2025

A handwritten signature in black ink, appearing to read "Peter M. Berkery, Jr.", is written over a horizontal line.

Peter M. Berkery, Jr.

Association of University Presses