

**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) **DECLARATION OF TOM WEST IN**
and on behalf of others similarly situated,) **SUPPORT OF PRELIMINARY**
) **APPROVAL OF CLASS SETTLEMENT**
Plaintiffs,)
)
v.)
)
ANTHROPIC PBC,)
)
Defendants.)

I, TOM WEST, declare and state as follows:

1. I am the Chief Executive of Publishers' Licensing Services Limited (PLS), a UK-based not-for-profit organisation that represents book, magazine, and journal publishers. PLS was established in 1981 and helps its more than 4,500 registered publishers by overseeing collective licensing for book, journal, magazine, and website copying.

2. The proposed settlement in this litigation is of great interest to PLS and its registered publishers. If the Court grants preliminary approval to the proposed settlement, PLS will give notice of the settlement to its registered publishers by including a link to the Settlement

Website and Long-Form Notice on (i) PLS's e-bulletin, which is sent to registered publishers each month; (ii) PLS's LinkedIn webpage; and (iii) PLS's website, pls.org.uk.

3. Through those same channels, PLS will also encourage its registered publishers to forward notice to contacts who may be interested in the settlement, including any publishers and authors who conceivably might be Class Members.

4. In addition, PLS will use its contacts with wider industry stakeholders to raise awareness of the notice of settlement and encourage its registered publishers to do the same with their own contacts and networks. PLS will liaise with industry associations and counterparts to seek a coordinated and consistent approach to external messaging about the notice of settlement and claims process to be followed.

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 22nd September 2025 in London, UK.

A handwritten signature in black ink, appearing to read 'Tom West', positioned above a horizontal line.

TOM WEST

Publishers' Licensing Services