

# EXHIBIT G

Theodore K. Cheng  
ADR Office of Theo Cheng LLC  
295 Princeton Hightstown Road  
Suite 11-115  
West Windsor, NJ 08550  
(917) 459-3669

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

ANDREA BARTZ, ANDREA BARTZ, INC.,  
CHARLES GRAEBER, KIRK WALLACE  
JOHNSON, and MJ + KJ, INC., individually and  
on behalf of others similarly situated,

Plaintiffs,

v.

ANTHROPIC PBC,

Defendant.

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

**SPECIAL MASTER DECLARATION  
PURSUANT TO FED. R. CIV. P. 53**

Judge: Hon. William Alsup  
Courtroom: 12, 19<sup>th</sup> Floor  
Complaint Filed: August 19, 2024

**DECLARATION OF THEODORE K. CHENG**

As required under Federal Rule of Civil Procedure 53(a)(2) and (b)(3)(A), I, Theodore K. Cheng, have reviewed the public pleadings and the docket and thoroughly familiarized myself with the issues involved in this case. I have determined that I do not have a relationship with the parties, attorneys, action, or court that would require disqualification under 28 U.S.C. § 455. Before adjudicating disputes, if any, among class members, I will make a specific disclosure of any conflicts to the class members.

I further certify that I am qualified to serve as Special Master for settlement claims in this matter. I have conducted over 800 arbitrations and mediations involving commercial and business disputes, breach of contract and negligence actions, trade secret theft, employment discrimination claims, wage-and-hour disputes, and intellectual property infringement contentions. The Justice Marie L. Garibaldi American Inn of Court for ADR presented me with the 2024 Richard K. Jeydel Award (for demonstrated civility, professionalism, ethics, and excellence in and service to ADR), and the New Jersey State Bar Association Dispute Resolution Section presented me with the 2020 James B. Boskey ADR Practitioner of the Year Award. In addition, the *National Law Journal* named me a 2017 ADR Champion; in 2022–2025, I was voted a Top Arbitrator by the readers of the *New York Law Journal*; and I received the 2021 Best Mediator/Arbitrator by the readers of the *New Jersey Law Journal*.

I am a member of the Commercial and Employment arbitration and mediation rosters of the American Arbitration Association and the International Centre for Dispute Resolution; the Commercial and Employment panels of arbitrators and mediators of Resolute Systems; and the Panel of Distinguished Neutrals of the CPR Institute. I was also appointed to the American Intellectual Property Law Association's List of Arbitrators and Mediators and the Silicon Valley Arbitration & Mediation Center's List of the World's Leading Technology Neutrals. In 2019, I was inducted into the National Academy of Distinguished Neutrals, and in 2022, I was inducted as a Fellow into the College of Commercial Arbitrators.

1 I declare under penalty of perjury that the foregoing is true.  
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3 Date: October 28, 2025

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