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Counsel for Third Party
ClaimsHero Holdings LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

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

**ATTORNEY DECLARATION OF ALEX
POTTER IN SUPPORT OF
CLAIMSHERO'S OPPOSITION TO
PLAINTIFFS' MOTION FOR ORDER
LIMITING THIRD PARTY'S
COMMUNICATIONS WITH CLASS
MEMBERS AND FOR OTHER RELIEF
PURSUANT TO FED. R. CIV. P. 23(d)**

I, Alex Potter, declare as follows:

1. I am a partner at Freedman Normand Friedland LLP and counsel for Third Party ClaimsHero Holdings LLC ("ClaimsHero"). I am admitted *pro hac vice* before the Court. (Dkt. No. 445).

2. I make this declaration in support of ClaimsHero's Opposition to Plaintiffs' Motion for An Order Limiting Third Party's Communications With Class Member and For Other Relief Pursuant to Fed. R. Civ. P. 23(d).

1 3. I have personal knowledge of the facts stated in this declaration and, if called as a
2 witness, I could and would testify competently to them.

3 4. On November 2, 2025, I responded to Class Counsel's communication to
4 ClaimsHero that they had unspecified concerns by setting up a call for the next day.

5 5. On November 3, 2025, a call was held between me, ClaimsHero's CEO Matthew
6 Freund, and Class Counsel—including Rachel Geman, Daniel Hutchinson, and Rohit Nath.

7 6. On the call, Class Counsel asserted ClaimsHero's website was misleading because
8 they found it unclear whether ClaimsHero was submitting claims to the settlement administrator
9 or opting clients out of the Settlement.

10 7. I requested detail regarding what aspects of the website Class Counsel considered
11 misleading.

12 8. Class Counsel pointed to (1) the existence of a button that stated "start a claim" to
13 initiate ClaimsHero's intake process and (2) that the Anthropic-related website did not have an
14 *express* statement that ClaimsHero is not affiliated with the settlement administrator or Class
15 Counsel.

16 9. I conveyed to Class Counsel that I would address potential revisions to the website
17 with ClaimsHero and asked them how the website might be revised such that their concerns
18 would be allayed.

19 10. Class Counsel responded with three demands: that (1) ClaimsHero take down
20 its website regardless of any revisions it might make, (2) ClaimsHero disclose all Anthropic-
21 related advertisements to them, and (3) ClaimsHero disclose the number of clients that had
22 retained it.

23 11. I informed Class Counsel I would discuss their requests with my client.

24 12. The same day, I emailed Class Counsel to let them know revisions had been made
25 to ClaimsHero's website to allay their concerns. *See* Dkt. No. 442-3 at 2.

26 13. I wrote, among other things, that: "I trust this correspondence has resolved your
27 concerns. To the extent it has not, I'd be happy to speak with you about what exactly you find
28 problematic." *Id.*

1 I declare under penalty of perjury that the foregoing is true and correct.

2 Executed on November 12, 2025, at San Francisco, California.

3 /s/ Alex Potter
4 Alex Potter

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