

EXHIBIT 6

DOUGLAS A. WINTHROP (Bar No. 183532)
Douglas.Winthrop@arnoldporter.com
JOSEPH FARRIS (Bar No. 263405)
Joseph.Farris@arnoldporter.com
JESSICA L. GILLOTTE (Bar No. 333517)
Jessica.Gillotte@arnoldporter.com
ESTAYVAINE BRAGG (Bar No. 341400)
Estayvaine.Bragg@arnoldporter.com
ARNOLD & PORTER KAYE SCHOLER LLP
Three Embarcadero Center, 10th Floor
San Francisco, CA 94111-4024
Telephone: (415) 471-3100
Facsimile: (415) 471-3400

MARK LEMLEY (Bar No. 155830)
mlemley@lex-lumina.com
LEX LUMINA LLP
700 S. Flower Street, Suite 1000
Los Angeles, CA 90017
Telephone: (213) 600-6063

Attorneys for Defendant ANTHROPIC PBC

ANGEL T. NAKAMURA (Bar No. 205396)
Angel.Nakamura@arnoldporter.com
OSCAR RAMALLO (Bar No. 241487)
Oscar.Ramallo@arnoldporter.com
ALLYSON MYERS (Bar No. 34038)
Ally.Myers@arnoldporter.com
ARNOLD & PORTER KAYE SCHOLER LLP
777 South Figueroa Street, 44th Floor
Los Angeles, CA 90017-5844
Telephone: (213) 243-4000
Facsimile: (213) 243-4199

JOSEPH R. WETZEL (Bar No. 238008)
joe.wetzel@lw.com
ANDREW M. GASS (Bar No. 259694)
andrew.gass@lw.com
LATHAM & WATKINS LLP
505 Montgomery Street, Suite 2000
San Francisco, CA 94111
Telephone: (415) 391-0600
Facsimile: (415) 395-8095

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

Action Filed: August 19, 2024

**ANTHROPIC PBC'S OBJECTIONS
AND RESPONSES TO PLAINTIFFS'
FORTH SET OF INTERROGATORIES**

Judge: Honorable William H. Alsup

1 **PROPOUNDING PARTY:** PLAINTIFFS ANDREA BARTZ, ANDREA BARTZ, INC.,
2 CHARLES GRAEBER, KIRK WALLACE JOHNSON, AND MJ + KJ, INC.

3 **RESPONDING PARTY:** DEFENDANT ANTHROPIC PBC

4 **SET NUMBER:** FOUR (4)

5 **ANTHROPIC PBC'S OBJECTIONS AND RESPONSES TO**
6 **PLAINTIFFS' FOURTH SET OF INTERROGATORIES**

7 Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Anthropic PBC
8 ("Anthropic"), by and through its undersigned counsel, hereby objects and responds to Plaintiffs'
9 Fourth Set of Interrogatories to Defendant Anthropic PBC, dated April 16, 2025 ("Interrogatories"),
10 as follows:

11 **OBJECTIONS TO "INSTRUCTIONS"**

12 Anthropic objects to the "Instructions" and "Definitions" to the extent they purport to impose
13 any obligations on it beyond those set forth in the Federal Rules of Civil Procedure or other
14 applicable rules.

15 **OBJECTIONS TO "DEFINITIONS"**

16 1. Anthropic objects to the definitions of "You," "Your," and "Anthropic" as vague and
17 ambiguous and also overbroad in scope, unduly burdensome, and not proportional to the needs of
18 the case. Anthropic will respond based on information that is reasonably within the possession,
19 custody, or control of Anthropic PBC.

20 2. Anthropic objects to the definition of "Torrenting" as vague and ambiguous and also
21 overbroad in scope, unduly burdensome, and not proportional to the needs of the case.

22 3. Anthropic objects to the Instruction/Definition that terms otherwise undefined in the
23 Interrogatories should be interpreted pursuant to the Dictionary Act, 1 U.S.C. §1, *et seq.*, and the
24 *New Oxford English*, 3d Ed. (2010) as vague, ambiguous, and unduly burdensome.

RESPONSE TO INTERROGATORIES**REQUEST FOR INTERROGATORY NO. 18:**

Please identify all datasets containing books that Anthropic downloaded or torrented. For each dataset, identify the number of times Anthropic downloaded or torrented it, the date(s) on which it did so, and the employee(s) who performed each download or torrent.

RESPONSE TO INTERROGATORY NO. 18:

Anthropic objects to this Interrogatory as overbroad to the extent it seeks responses for any dataset beyond the three datasets identified as relevant to the proposed definitions of the putative classes (*see* ECF No. 125), *i.e.*, the Book3 Dataset, the LibGen Dataset, and the PiLiMi Dataset. Anthropic objects to this Interrogatory on the grounds that it is vague and ambiguous and also overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it seeks a response about massive compilations of data contained in (i) datasets beyond those used to train its commercially released and generally accessible Claude models as of the date of these Responses, and (ii) datasets that are not relevant to Plaintiffs' proposed class definitions. Anthropic further objects to this Interrogatory on grounds that the terms "books," "download," "downloaded," "torrent," and "torrented" are vague and ambiguous. Anthropic interprets the word "books" to mean written works that have been issued a 10- or 13-digit ISBN. Anthropic interprets the word "download" and "downloaded" to refer to downloading from an external source. Anthropic interprets the word "torrent" and "torrented" to refer to torrenting from an external source. Anthropic objects to this Interrogatory as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it asks Anthropic to undertake to identify all possible "books" within these datasets, particularly with respect to datasets that are not composed primarily of books. Further answering, Anthropic trains its models on massive amounts of data, including portions of datasets sourced from the Internet (such as, without limitation, components of The Pile and Common Crawl) and Anthropic does not know all the contents of those datasets. It has made a good faith effort to identify the relevant datasets that are composed primarily of books. Other datasets may contain books, but it would be extremely difficult (if not impossible) and enormously burdensome to attempt

1 to forensically analyze those datasets to verify all of the information in them that could constitute
2 books or portions of books.

3 Subject to and without waiving the foregoing objections, Anthropic responds as follows:

4 To the best of its knowledge, Anthropic acquired the **Book3** Dataset, the **LibGen** Dataset,
5 and the **PiLiMi** Dataset as described below:

6 • **pile.books3_source** (the “Books3 Dataset”) - Ben Mann downloaded this dataset on or
7 around February 25, 2021.

8 • **libgen/fiction** and **libgen/nonfiction** (together, the “LibGen Dataset”) - Ben Mann
9 torrented the LibGen Dataset between June 8, 2021 and June 19, 2021.

10 • **Pilimi**, **pilimi_full**, **pilimi_full2**, and **pilimi_complete** (together, the “PiLiMi Dataset”) -
11 Sheer El-Showk and Nova DasSarma torrented the PiLiMi Dataset between July 8, 2022
12 and August 10, 2022.

13
14 Dated: April 22, 2025

ARNOLD & PORTER KAYE SCHOLER LLP

15 By: /s/ Douglas A. Winthrop
16 DOUGLAS A. WINTHROP

17 *Attorneys for Defendant*
18 ANTHROPIC PBC
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I am a resident of the State of California, over the age of eighteen years and not a party to the within-entitled action; my business address is Three Embarcadero Center, Tenth Floor, San Francisco, California 94111-4024. On April 22, 2025, the foregoing **ANTHROPIC PBC'S OBJECTIONS AND RESPONSES TO PLAINTIFFS' FOURTH SET OF INTERROGATORIES (NO. 18)** was electronically served on the following:

Justin A. Nelson (*pro hac vice*)
Alejandra C. Salinas (*pro hac vice*)
Collin Fredricks (*pro hac vice*)
SUSMAN GODFREY L.L.P
1000 Louisiana Street, Suite 5100
Houston, TX 77002-5096
Telephone: (713) 651-9366
jnelson@susmangodfrey.com
asalinas@susmangodfrey.com
cfredricks@susmangodfrey.com

Rohit D. Nath (SBN 316062)
SUSMAN GODFREY L.L.P
1900 Avenue of the Stars, Suite 1400
Los Angeles, CA 90067-2906
Telephone: (310) 789-3100
RNath@susmangodfrey.com

Jordan W. Connors (*pro hac vice*)
SUSMAN GODFREY L.L.P
401 Union Street, Suite 3000
Seattle, WA 98101
Telephone: (206) 516-3880
jconnors@susmangodfrey.com

J. Craig Smyser (*pro hac vice*)
SUSMAN GODFREY L.L.P
One Manhattan West, 51st Floor,
New York, NY 10019
Telephone: (212) 336-8330
csmyser@susmangodfrey.com

Rachel Geman (*pro hac vice*)
Wesley Dozier (*pro hac vice*)
Anna Freymann (*pro hac vice*)
Jacob Miller (*pro hac vice*)

**LIEFF CABRASER HEIMANN
& BERNSTEIN, LLP**

250 Hudson Street, 8th Floor
New York, New York 10013-1413
Telephone: (212) 355-9500
rgeman@lchb.com
wdozier@lchb.com
afreymann@lchb.com
jmiller@lchb.com

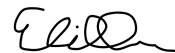
Reilly T. Stoler (SBN 310761)
**LIEFF CABRASER HEIMANN
& BERNSTEIN, LLP**

275 Battery Street, 29th Floor
San Francisco, CA 94111-3339
Telephone: (415) 956-1000
rstoler@lchb.com

Scott J. Sholder (*pro hac vice*)
CeCe M. Cole (*pro hac vice*)
**COWAN DEBAETS ABRAHAMS
& SHEPPARD LLP**

60 Broad Street, 30th Floor
New York, New York 10010
Telephone: (212) 974-7474
ssholder@cdas.com
ccole@cdas.com

I declare under penalty of perjury under the laws of the State of California that the foregoing
is true and correct. Executed April 22, 2025 at San Francisco, California.



ELIJAH QUASTLER