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

ANDREA BARTZ, CHARLES GRAEBER, and
KIRK WALLACE JOHNSON, individually and
on behalf of others similarly situated,

Plaintiffs,

v.

ANTHROPIC PBC,

Defendant.

Case No. 4:24-cv-05417-AMO

**JOINT STIPULATION AND
[PROPOSED] ORDER APPROVING
FURTHER UPDATES TO THE
SETTLEMENT WEBSITE**

1 The parties to the above-referenced action, through their respective counsel of record,
2 hereby enter into the following stipulation, subject to the Court's approval, to update the
3 Settlement Website as detailed in Exhibit A filed herewith.

4 WHEREAS, Class Members rely on the Settlement Website for updates on Settlement
5 status, administration, and distribution.

6 WHEREAS, since the Court granted final approval of the Settlement (Dkt. 680), Class
7 Counsel have received questions from Class Members about what the order means and what
8 comes next.

9 WHEREAS, the Court approved the parties' previous proposed updates to the Settlement
10 Website. Dkt. 692.

11 WHEREAS, Class Counsel and the Settlement Administrator have received recurring
12 questions about the claims process, claim allocations among co-claimants for the same work, and
13 the allocation portal set up for claimants to make adjustments to their claimed allocations.

14 WHEREAS, to provide Class Members access to updated information about the claims
15 process, the parties agree to further update the Settlement Website to address recurring Class
16 member inquiries.

17 WHEREAS, while the Court previously directed that modifications to Class Notice be
18 submitted by joint motion for approval, *see* Dkt. 453 at 5, and Class Notice already was
19 effectuated, the Parties recognize that the Settlement Website remains a primary tool to
20 communicate with the Class, *see* Dkt. 437 at 8, and accordingly notify the Court that they have
21 stipulated to the following updates that are informative, responsive to recurring questions, and
22 presented in a neutral manner.

23 WHEREAS, the proposed Settlement Website updates are also intended to reduce
24 administration costs by answering questions that would otherwise be directed to the Settlement
25 Administrator, and help Class Members prepare for next steps, including resolving any allocation
26 disputes with fellow rightsholders and receiving Settlement payments.

27 WHEREAS, the Parties anticipate that the Settlement Administrator will send notices of
28 agreed allocations on or before November 13, 2026, and the initial distribution of the Settlement

1 payments during the week of November 23, 2026.

2 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by the Parties, and
3 subject to approval by the Court:

4 1. The proposed additions to the Frequently Asked Questions page (Exhibit A) will
5 explain how Class Members can use the allocation portal to submit and update information
6 regarding their claims, explain how Class Members may navigate claims by co-rightsholders, and
7 explain relevant deadlines for the dispute resolution process.

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10 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

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12 DATED: _____, 2026.

13 _____
14 The Honorable Araceli Martínez-Olguín
15 United States District Court Judge
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1 Dated: October 23, 2026

Respectfully submitted,

2 By: /s/ Rachel Geman

By: /s/ Douglas A. Winthrop

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ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3), I hereby attest that all signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

Dated: October 23, 2026

/s/ Rachel Geman
Rachel Geman