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11 Attorneys for Defendant CEREBRAS SYSTEMS INC.

12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN FRANCISCO DIVISION

15 DARIUS H. JAMES, individually and on
behalf of similarly situated individuals,

16 Plaintiff,

17 v.

18 CEREBRAS SYSTEMS INC., a Delaware
19 corporation,

20 Defendant.

Case No. 3:25-cv-09361-AMO

**CEREBRAS SYSTEMS INC.'S ANSWER
TO COMPLAINT**

Dept.: Courtroom 10 — 19th Floor
Judge: Hon. Araceli Martínez-Olgún

Date Filed: October 30, 2025

Trial Date: Not yet set

1 Defendant Cerebras Systems Inc. (“Cerebras” or “Defendant”) by and through its
2 attorneys, hereby answers the Class Action Complaint (“Complaint”) filed by Plaintiff Darius H.
3 James (“Plaintiff”) and states as follows:

4 **OVERVIEW**

5 1. Denied.

6 2. Cerebras admits that Cerebras-GPT is a family of seven models, each with GPT-3-
7 like architecture. Cerebras admits that the architecture for each of the Cerebras-GPT models is a
8 type of LLM architecture. Cerebras admits that it publicly released the Cerebras-GPT models for
9 download in March 2023. Cerebras denies any remaining allegations of this paragraph.

10 3. Cerebras admits that pre-training is a process that teaches language to a model by
11 showing the model a wide range of text, and, utilizing sophisticated statistical and computational
12 analysis, having it try to predict the word that comes next in each of a huge range of sentences.
13 Cerebras admits that models are made up of large strings of numbers (called "parameters" or
14 "weights") and that each weight roughly reflects the statistical relationship between different
15 words in different scenarios. Cerebras denies any remaining allegations of this paragraph.

16 4. Denied.

17 5. Cerebras is without knowledge or information sufficient to form a belief as to the
18 truth of the allegations of this paragraph regarding Plaintiff or Class members and, on that basis,
19 denies them. Cerebras denies any remaining allegations of this paragraph.

20 6. Denied.

21 **JURISDICTION AND VENUE**

22 7. For purposes of this action, Cerebras does not dispute subject matter jurisdiction.

23 8. For purposes of this action, Cerebras does not dispute that jurisdiction and venue is
24 proper in this district. Cerebras also does not dispute that it is headquartered in this District or that
25 it created the Cerebras-GPT models and distributes them as open-sourced models. Cerebras
26 denies any remaining allegations of this paragraph.

27 9. For purposes of this action, Cerebras does not dispute that venue is proper in this
28 district.

PARTIES

10. Cerebras is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, on that basis, denies them.

11. Cerebras is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, on that basis, denies them.

12. Admitted.

13. Denied.

14. Denied.

FACTUAL ALLEGATIONS

15. Cerebras admits that it was founded in 2015 and is an AI hardware company that produces wafer-scale processors and offers an AI inference and training platform. Cerebras admits that its CS-2 and CS-3 systems are used by clients across a variety of different fields. Cerebras admits that it offers "Developer" and "Enterprise" pricing tiers for inference API access to certain models and that it offers users in these tiers "pay-per-token" pricing. Cerebras denies any remaining allegations of this paragraph.

16. Cerebras admits that pre-training is a process that teaches language to a model by showing the model a wide range of text, and, utilizing sophisticated statistical and computational analysis, having it try to predict the word that comes next in each of a huge range of sentences. Cerebras denies any remaining allegations of this paragraph.

17. Cerebras admits that models are made up of large strings of numbers (called "parameters" or "weights") and that each weight roughly reflects the statistical relationship between different words in different scenarios. Cerebras admits that as a model "learns" during the training process, its weights update to reflect this improvement. Cerebras admits that one Cerebras-GPT model has 13 billion parameters. Cerebras denies any remaining allegations of this paragraph.

18. Denied.

19. Cerebras is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, on that basis, denies them.

1 20. Cerebras admits that the quoted language appears in Leo Gao *et al.*, *The Pile: An*
2 *800GB Dataset of Diverse Text for Language Modeling* 3-4 (2020). Cerebras denies any
3 remaining allegations of this paragraph.

4 21. Cerebras is without knowledge or information sufficient to form a belief as to the
5 truth of the allegations of this paragraph regarding websites or libraries and, on that basis, denies
6 them. The remaining allegations in this paragraph state a legal conclusion to which no response is
7 required.

8 22. Cerebras is without knowledge or information sufficient to form a belief as to the
9 truth of the allegations of this paragraph and, on that basis, denies them.

10 23. Cerebras is without knowledge or information sufficient to form a belief as to the
11 truth of the allegations of this paragraph and, on that basis, denies them.

12 24. Cerebras is without knowledge or information sufficient to form a belief as to the
13 truth of the allegations of this paragraph and, on that basis, denies them.

14 25. Cerebras is without knowledge or information sufficient to form a belief as to the
15 truth of the allegations of this paragraph and, on that basis, denies them.

16 26. Cerebras is without knowledge or information sufficient to form a belief as to the
17 truth of the allegations of this paragraph regarding Plaintiff's or Class members' copyrighted
18 works and, on that basis, denies them. Cerebras admits that it has used portions of the Pile in
19 connection with the training of Cerebras-GPT models. Cerebras denies the remaining allegations
20 in this paragraph.

21 27. Cerebras admits that it publicly released the Cerebras-GPT models for download
22 in March 2023. Cerebras admits that it has used portions of the Pile in connection with the
23 training of Cerebras-GPT models. Cerebras denies the remaining allegations in this paragraph.

24 28. To the extent the allegations in this paragraph purport to reference a publicly
25 available research paper, the full text of that paper speaks for itself. To the extent the allegations
26 in this paragraph purport to summarize or are inconsistent with it, Cerebras denies those
27 allegations. Cerebras denies any remaining allegations of this paragraph.

29. To the extent the allegations in this paragraph purport to quote from a publicly available research paper, the full text of that paper speaks for itself. To the extent the allegations in this paragraph purport to summarize or are inconsistent with it, Cerebras denies those allegations. Cerebras denies any remaining allegations of this paragraph.

30. Cerebras admits that it has used portions of the Pile in connection with the training of Cerebras-GPT models. Cerebras denies the remaining allegations in this paragraph.

31. Denied.

32. Denied.

CLASS ALLEGATIONS

33. Cerebras is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph about Plaintiff and, on that basis, denies them. The remaining allegations in this paragraph state a legal conclusion to which no response is required.

34. Cerebras is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph about Plaintiff or Class members and, on that basis, denies them. Cerebras denies any remaining allegations of this paragraph.

35. Denied.

36. Denied.

37. Denied.

38. Denied.

39. Denied.

FIRST CAUSE OF ACTION

**Direct Copyright Infringement,
(17 U.S.C. § 501)**

(On Behalf of Plaintiff and the Class)

40. Cerebras repeats and incorporates by reference its responses to the allegations contained in each preceding paragraph as if fully set forth herein.

41. Cerebras is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, on that basis, denies them.

42. Cerebras is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph regarding Plaintiff's copyrighted works and, on that basis, denies them. Cerebras admits that it has used portions of the Pile in connection with the training of Cerebras-GPT models. Cerebras denies the remaining allegations in this paragraph.

43. Cerebras is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph regarding Plaintiff or Class members and, on that basis, denies them. The remaining allegations in this paragraph state a legal conclusion to which no response is required.

44. Denied.

45. Denied.

46. Denied.

47. Denied.

48. The allegations in this paragraph state a legal conclusion to which no response is required. To the extent a response is required, Cerebras denies that it has committed any acts of infringement. Cerebras denies the remaining allegations in this paragraph, including that Plaintiff is entitled to damages.

PRAYER FOR RELIEF

These paragraphs set forth the statement of relief requests by Plaintiff to which no response is required. Cerebras denies that Plaintiff is entitled to any of the requested relief.

Cerebras denies each and every allegation in Plaintiff's Complaint not specifically admitted or otherwise responded to above. Cerebras reiterates and specifically denies that it has infringed or is liable for infringement of any valid and enforceable claims of Plaintiff, if any. Cerebras further specifically denies that Plaintiff is entitled to any relief whatsoever against Cerebras as a result of any act of Cerebras or any person or entity acting on behalf of Cerebras.

JURY TRIAL DEMAND

With respect to the jury demand contained in Plaintiff's Complaint, Cerebras states that no response is required. To the extent a response is deemed required, Cerebras demands a jury trial on all issues so triable.

AFFIRMATIVE DEFENSES

In further answer to the allegations made by Plaintiff in the Complaint, Cerebras asserts the following affirmative defenses. Cerebras does not concede that it has the burden of proof on the defenses listed below.

FIRST AFFIRMATIVE DEFENSE

To the extent there is copying of copyrightable expression, that copying constitutes fair use.

SECOND AFFIRMATIVE DEFENSE

Plaintiff's claim fails in whole or in part because the complained-of use was validly authorized by express or implied license.

THIRD AFFIRMATIVE DEFENSE

Plaintiff's claim is barred in whole or in part by the doctrines of waiver, abandonment, and/or forfeiture.

FOURTH AFFIRMATIVE DEFENSE

Plaintiff's claim is barred, in whole or in part, by the doctrine of laches.

FIFTH AFFIRMATIVE DEFENSE

Plaintiff's claim is barred, in whole or in part, by the doctrine of estoppel.

SIXTH AFFIRMATIVE DEFENSE

Plaintiff's remedies are barred at least in part by the applicable statute of limitations.

SEVENTH AFFIRMATIVE DEFENSE

Plaintiff's claim is barred in whole or in part by the doctrine of unclean hands.

EIGHTH AFFIRMATIVE DEFENSE

Plaintiff's claim fails in whole or in part because Cerebras's conduct was innocent, not willful.

NINTH AFFIRMATIVE DEFENSE

Plaintiff is barred from recovery of damages because of and to the extent of his failure to mitigate his alleged damages (to which, in any event, he is not entitled).

TENTH AFFIRMATIVE DEFENSE

Some or all of the material in which Plaintiff claims copyright is in the public domain.

ELEVENTH AFFIRMATIVE DEFENSE

Plaintiff's claim of copyright infringement is barred or limited by the doctrine of merger.

TWELFTH AFFIRMATIVE DEFENSE

Plaintiff's claim of copyright infringement is barred or limited by the idea/expression dichotomy.

THIRTEENTH AFFIRMATIVE DEFENSE

Plaintiff's claim of copyright infringement is barred or limited because the material in which he claims copyright constitutes "scenes a faire."

FOURTEENTH AFFIRMATIVE DEFENSE

To the extent there is copying of copyrightable expression, that copying is de minimis.

FIFTEENTH AFFIRMATIVE DEFENSE

Plaintiff's claim fails in whole or in part because Plaintiff has not suffered and is not likely to suffer any injury or damages as a result of the conduct alleged of Cerebras in the Complaint.

REQUEST FOR RELIEF

WHEREFORE, Cerebras prays as follows:

1. That Plaintiff takes nothing by this action;
2. That the Court enter judgment in Cerebras's favor and against Plaintiff;
3. That the Court deny certification of any class;
4. That the Court dismiss Plaintiff's Complaint with prejudice;
5. That the Court award costs and fees to Cerebras; and
6. For such further relief as the Court may deem just and proper.

1 Dated: February 2, 2026

KEKER, VAN NEST & PETERS LLP

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13 SYSTEMS INC.
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