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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

CAMBRONNE INC., LISA BARRETTA,
PHILIP SHISHKIN, JANE ADAMS,
MATTHEW SACKS, and MICHAEL
KOCHIN,

Plaintiffs,

v.

ANTHROPIC PBC; GOOGLE LLC;
XAI CORPORATION; PERPLEXITY AI,
INC.; APPLE, INC.; and NVIDIA
CORPORATION,

Defendants.

Case No. 5:25-cv-10897-PCP

Related Case:

No. 4:26-cv-04056-KAW

**NOTICE OF RELATED CASES;
PLAINTIFF COGNELLA INC.'S
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER CASES SHOULD
BE RELATED (L.R. 3-12, 7-11)**

TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that a related case, *Cognella, Inc. v. Anthropic PBC*, Case No. 4:26-cv-04056-KAW, was filed on May 4, 2026, in the United States District Court of the Northern District of California. Pursuant to Local Rule 3-12(b) and 7-11 of the United States District Court for the Northern District of California, Plaintiff Cognella submits this Administrative Motion because Case No. 4:26-cv-04056-KAW is related, as defined by Local Rule 3-12(a), to Case No. 5:25-cv-10897-PCP.

I. Applicable Standard Under Civil L.R. 3-12

Under Civil Local Rule 3-12, an action is related to another when:

1. The actions concern substantially the same parties, property, transaction, event, or question of law; and
2. It appears likely that there will be an unduly burdensome duplication of labor and expense or conflicting results if the cases are conducted before different Judges. Civil L.R. 3-12(a).

An Administrative Motion to Consider Whether Cases Should be Related must contain: “(1) The title and case number of each apparently related case; (2) A brief statement of the relationship of the actions according to the criteria set forth in Civil L.R. 3-12(a).”

II. Related Cases

The cases are related in each of the following respects:

1. Defendant, Anthropic PBC, is a common defendant in both cases.
2. Plaintiffs in both cases are represented by the same attorneys.
3. By and large, the factual allegations and legal claims in both cases are overlapping. Plaintiffs in both cases allege that Anthropic, a developer of commercial large language models (“LLMs”), downloaded and used Plaintiffs’ copyrighted works, without consent or authorization, in the development, training, fine-tuning, and deployment of its LLMs. Plaintiffs in these cases allege that Anthropic relied on pirate libraries and pirated datasets in its scheme to use Plaintiffs’ copyrighted works without authorization.

1 Accordingly, given the overlapping nature of these cases (including Defendant Anthropic,
2 factual allegations, and causes of action), an assignment to a single judge is likely to conserve
3 judicial resources and promote the most efficient determination of the actions.

4 Counsel for Defendant Anthropic has informed undersigned counsel that Anthropic will
5 oppose this Administrative Motion.

6 **III. Conclusion**

7 For the reasons set forth above, Cognella, Inc. respectfully requests that the Court enter an
8 order relating *Cognella, Inc. v. Anthropic PBC*, Case No. 4:26-cv-04056-KAW, to *Cambronne Inc.,*
9 *et al. v. Anthropic PBC, et al.*, Case No. 5:25-cv-10897-PCP.

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1 Dated: May 7, 2026

Respectfully submitted,

2 /s/ Christopher M. Rigali

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