

Elizabeth Brannen (SBN 226234)
ebrannen@stris.com
John Stokes (SBN 310847)
jstokes@stris.com
Lauren Martin (SBN 294367)
lmartin@stris.com
STRIS & MAHER LLP
17785 Center Court Dr N, Ste 600
Cerritos, CA 90703
T: (213) 995-6800
F: (213) 261-0299

Christopher M. Rigali (*pro hac vice*)
crigali@stris.com
Jacqueline Sahlberg (*pro hac vice*)
jsahlberg@stris.com
STRIS & MAHER LLP
1717 K St NW Ste 900
Washington, DC 20006
T: (202) 800-5749

Counsel for Plaintiff

Bridget Asay (*pro hac vice*)
basay@stris.com
STRIS & MAHER LLP
15 East State Street, Ste 2
Montpelier, VT 05602
T: (802) 858-4285

Kyle Roche (*pro hac vice*)
kroche@fnf.law
Devin (Velvel) Freedman (*pro hac vice*)
vel@fnf.law
Alex Potter (*pro hac vice*)
apotter@fnf.law
**FREEDMAN NORMAND
FRIEDLAND LLP**
155 E. 44th Street, Ste 915
New York, NY 10017
T: (646) 494-2900

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

**DECLARATION OF CHRISTOPHER M.
RIGALI IN SUPPORT OF PLAINTIFF
COGNELLA INC.'S ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
CASES SHOULD BE RELATED (L.R. 3-12,
7-11)**

1 I, Christopher M. Rigali, declare as follows:

2 1. I am a partner at Stris & Maher LLP and counsel of record for Plaintiff Cognella, Inc.
3 in *Cognella, Inc. v. Anthropic PBC*, Case No. 4:26-cv-04056-KAW (“*Cognella*”). I have personal
4 knowledge of the matters stated herein and, if called upon, could competently testify thereto. I make
5 this declaration pursuant to 28 U.S.C. Section 1746 in support of Plaintiff Cognella’s Administrative
6 Motion to Consider Whether Cases Should be Related.

7 2. Attached hereto as **Exhibit A** is a true and correct copy of the Complaint in *Cognella*,
8 which was filed on May 4, 2026. My firm and co-counsel from Freedman Normand Friedland LLP
9 represent the Plaintiff in the *Cognella* as well as Plaintiffs in *Cambronne et al. v. Anthropic PBC et*
10 *al.*, No. 5:25-cv-10897-PCP (“*Cambronne*”).

11 3. In the *Cognella* and *Cambronne* actions, Plaintiffs allege that Defendant Anthropic,
12 a developer of commercial large language models (“LLMs”), downloaded and used Plaintiffs’
13 copyrighted works, without consent or authorization, in the development, training, fine-tuning, and
14 deployment of its LLMs. Plaintiffs in these cases allege that Defendant relied on pirate libraries and
15 pirated datasets in its scheme to use Plaintiffs’ copyrighted works without authorization. As stated
16 in the Administrative Motion, there is substantial overlap between these actions, including
17 Defendant, Plaintiffs’ counsel, factual allegations, causes of action, and legal issues.

18 4. Plaintiff Cognella is “promptly” filing the Administrative Motion under Civil Local
19 Rule 3-12 and is doing so as close in time as possible to the filing of the *Cognella* action so the
20 Court can consider whether to relate the cases. Counsel for Anthropic advised undersigned counsel
21 that it will oppose this Motion and will seek to relate both *Cognella* and *Cambronne* to *Bartz v.*
22 *Anthropic PBC*, Case No. 3:2024-cv-05417, after the Court rules on Defendants’ severance motions
23 in *Cambronne*. Plaintiff notes, however, that after Anthropic filed in *Bartz* a Notice of Intent to File
24 Administrative Motion to Consider Whether Cases Should Be Related, *see Bartz*, ECF 625, 3:24-
25 cv-5417-AMO (filed Mar. 25, 2026) (indicating that Anthropic will move to consider relation of
26 *Cambronne* and another case to *Bartz*), Judge Martinez-Olguin issued an order, which stated, in
27 part: “Anthropic is on notice that while it is free to file its motion, the Court is unlikely to relate the
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1 cases listed in its notice,” *see id.* ECF 632 (Apr. 8, 2026 Order). Given these circumstances, Plaintiff
2 is proceeding by way of Administrative Motion rather than by stipulation.

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

4 Dated: May 7, 2026

Respectfully submitted,

5 /s/ Christopher M. Rigali

6 Christopher M. Rigali

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