EXHIBIT A

From: LeGolvan, Andy
To: Kyle Roche; Lauren E Martin
Cc: AI Copyright Team; Bartz-Optouts-Anthropic
Subject: Cambronne - Limited Discovery Deferral
Date: Wednesday, September 30, 2026 2:13:27 PM
Attachments: Cambronne - Motion for Partial Stay of Discovery.docx

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Kyle and Lauren,

We write to meet and confer about a limited, temporary deferral of discovery in the *Cambronne*-related cases.

Anthropic proposes deferring discovery directed to Plaintiffs' BitTorrent reuploading theory (Count I distribution and Count II) and the CMI theory (Count III) until Judge Pitts rules on Anthropic's motion to dismiss (ECF No. 228; hearing Dec. 17). Discovery on the Count I reproduction theory would proceed.

The pending motion challenges both theories on the pleadings, including under the Supreme Court's decision in *Cox* and the Ninth Circuit's recent decision in *Doe 1 v. GitHub*. Discovery on these theories would require burdensome, work-by-work party and nonparty discovery beyond what is necessary for the reproduction claim. A short deferral avoids that effort if the claims are dismissed and lets both sides proceed with a clearer picture of what remains. Anthropic would also withdraw the limited discovery requests served on Plaintiffs for these claims, e.g., the two standard contention interrogatories.

Will Plaintiffs agree to this on consent? If so, we'll prepare a short stipulation and proposed order.

If not, we'd like to meet and confer this week so we can raise it to Magistrate Judge Cousins promptly, per Judge Pitts' referral. Please let us know your availability today, Thursday, or Friday to confer. To give a clearer picture of the grounds, and assuming the parties are unable to reach agreement, we've attached a draft joint discovery letter with Anthropic's position, consistent with Judge Cousins's Civil Standing Order. If we can't resolve this issue in the interim by agreement, please send Plaintiffs' portion by Monday, Oct 5, so we can file promptly.

Best,
Andy

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