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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

CONCORD MUSIC GROUP, INC., ET AL.,
Plaintiffs,

v.

ANTHROPIC PBC, ET AL.
Defendant.

Case No. 5:26-cv-00880-EKL-SVK

**ADMINISTRATIVE MOTION FOR
LEAVE TO FILE AS EXHIBIT THE
DECLARATION OF SARAH
RODRIGUEZ IN SUPPORT OF
ANTHROPIC'S JOINT DISPUTE
STATEMENT**

1 Pursuant to Local Rule 7-11, Anthropic PBC (“Anthropic”) respectfully requests leave to
2 provide the Declaration of Sarah Rodriguez as an exhibit to the Court in connection with the Parties’
3 Joint Discovery Dispute Statement regarding Anthropic’s preservation of prompt and output
4 records.

5 The Parties are filing, contemporaneously with this motion, a Joint Discovery Dispute
6 Statement regarding Anthropic’s obligations to preserve prompts and output data, pursuant to this
7 Court’s Standing Order Section 7(b). The Federal Rules of Civil Procedure guide the scope of
8 preservation, balancing relevance and burden. *See* Fed. R. Civ. P. 26(b)(1). Consistent with that
9 standard, the District’s ESI Guidelines advise “[t]he proportionality standard set forth in Fed. R.
10 Civ. P. 26(b)(1) should be applied” for ESI. N.D. Cal. ESI Guidelines § 1.03. Federal Rule of Civil
11 Procedure 26(c) permits the Court to circumscribe discovery to protect a party from “undue burden
12 or expense” upon a showing of good cause. *Al Otro Lado, Inc. v. Nielsen*, 328 F.R.D. 408, 415 (S.D.
13 Cal. 2018). In considering whether a protective order limiting a party’s preservation obligations is
14 appropriate, one factor courts consider is an entity’s ability “to maintain the evidence sought to be
15 preserved[,]” including “the physical, spatial and financial burdens” associated with preservation.
16 *Id.* at 416 (citation omitted).

17 In its portion of the Joint Discovery Dispute Statement, Anthropic cites evidence regarding
18 the preservation costs in support of its Rule 26 arguments. Publishers suggested that Anthropic had
19 not offered a declaration to substantiate those costs. Section 7(b) of this Court’s Standing Order
20 provides that, “[a]bsent prior leave of Court, the only additional exhibit(s) permitted to the joint
21 statement are a copy of the specific discovery request(s) at issue and the response(s) to it.” To
22 substantiate Anthropic’s statements of the costs, Anthropic has prepared the attached declaration of
23 Sarah Rodriguez and moves the Court for leave to file the declaration. Anthropic shared the
24 declaration with Publishers during the parties’ exchange of their portions of the joint dispute
25 statement.

26 Because evidence of Anthropic’s preservation costs will assist the Court’s proportionality
27 analysis, Anthropic respectfully requests leave to file the attached declaration of Sarah Rodriguez
28 in support of Anthropic’s portion of the Parties’ Joint Discovery Dispute Statement.

1 Pursuant to Local Rule 7-11, Anthropic conferred with Publishers before filing this motion
2 to get their position. Publishers take no position on the motion.
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5 Date: July 6, 2026

/s/ Sonal N. Mehta

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