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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

R.O. KWON, ALEXANDER DREIHANN-
HOLENIA, STEPHANIE GREIST,
ELIZABETH HINTON, BRIAN JACKSON,
JASON ALAN JANKOVSKY, BRANDEN W.
JOSEPH, KIMBERLY KAY HOANG,
GLENN KREISBERG, RICHARD
KREVOLIN, GERALD LAMB, CHANG-
RAE LEE, JEANNIE LEVINSON, STEVEN
LOWENTHAL, MACKENZIE BLUE LLC,
BRAIN MALEC, DONNA MATNEY, ILONA
MCCARTY, TIFFANY MCDANIEL, BRIAN
MERCHANT, ERIC L. MULLER, SONIA
NAZARIO, DANIEL JOSÉ OLDER,
LAURENCE RALPH, LILLIAM RIVERA,
SETH A. ROBERTS, AIDA SALAZAR,
ERIKA L. SANCHEZ, JEREMY N. SMITH,
SOUL WRITERS, LLC, RAMESH
SRINIVASAN, ROBERT TANNENBAUM,
KENNETH WARNER, AND ROBERT
ZIMMERMAN,

Plaintiffs,

v.

ANTHROPIC PBC,

Defendant.

Case No. 3:26-cv-04649-LB

**JOINT STIPULATION AND [PROPOSED]
ORDER TO STAY DEADLINES AND
PROCEEDINGS**

Complaint Filed: May 15, 2026

Judge: Hon. Laurel Beeler

1 Plaintiffs R. O. Kwon, Alexander Dreihann-Holenia, Stephanie Griest, Elizabeth Hinton,
 2 Brian Jackson, Jason Alan Jankovsky, Branden W. Joseph, Kimberly Kay Hoang, Glenn Kreisberg,
 3 Richard Krevolin, Gerald Lamb, Chang-rae Lee, Jeannie Levinson, Steven Lowenthal, Mackenzie
 4 Blue LLC, Brian Malec, Ilona McCarty, Tiffany McDaniel, Brian Merchant, Eric L. Muller, Sonia
 5 Nazario, Daniel José Older, Laurence Ralph, Lilliam Rivera, Seth A. Roberts, Aida Salazar, Erika
 6 L. Sanchez, Jeremy N. Smith, Soul Writers, LLC, Ramesh Srinivasan, Robert Tannenbaum, Kenneth
 7 Warner, and Robert Zimmerman (collectively “Plaintiffs”)¹ and Defendant Anthropic PBC
 8 (“Anthropic”) through their undersigned counsel, hereby stipulate and declare as follows:

9 WHEREAS, on May 15, 2026, Plaintiffs filed suit against Anthropic alleging that Anthropic
 10 infringed their copyrighted works to build and train Anthropic’s artificial intelligence large language
 11 models (“LLMs”);

12 WHEREAS, prior to the filing of this case, Plaintiffs’ counsel, on behalf of six other
 13 plaintiffs pursuing copyright infringement and related allegations that are similar to the allegations
 14 in this case, filed another case, *Cambronne Inc., et al. v. Anthropic PBC, et al.*, Case No. 5:25-cv-
 15 10897-PCP (N.D. Cal.), against Anthropic and several other entity-defendants;

16 WHEREAS, Plaintiffs’ counsel has also commenced additional cases on behalf of additional
 17 plaintiffs with allegations similar to the allegations in this case: *Cognella, Inc. v. Anthropic PBC*,
 18 Case No. 3:26-cv-04056-RFL (N.D. Cal.) (complaint filed May 4, 2026); *Chicken Soup for the Soul,*
 19 *LLC v. Anthropic PBC*, Case No. 4:26-cv-04218-HSG (N.D. Cal.) (complaint filed May 7, 2026);
 20 and *Cruz et al. v. Anthropic PBC*, Case No. 5:26-cv-04482-SVK (N.D. Cal.) (complaint filed May
 21 13, 2026);

22 WHEREAS, on May 7, 2026, the *Cambronne* plaintiffs filed an Administrative Motion,
 23 pursuant to Local Rule 3-12 and 7-11, seeking to relate the *Cambronne* and *Cognella* actions. *See*
 24 ECF 176, 5:25-cv-10897-PCP (N.D. Cal.). The Administrative Motion remains pending.

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 26
 27 ¹ Although Donna Matney was a named Plaintiff when this lawsuit was filed, she was dismissed
 28 from the case pursuant to a Notice of Voluntary Dismissal filed on May 19, 2026. ECF 6.

1 WHEREAS, in the *Cambronne* action, all remaining Defendants have separately moved for
2 severance, *see* ECF Nos. 94, 106, 112, 114, 115, 161, and 164, 5:25-cv-10897-PCP (N.D. Cal.), and
3 a hearing on the motions to sever took place on May 12, 2026;

4 WHEREAS, the parties appeared for a status conference before the Honorable P. Casey Pitts
5 in the *Cambronne* action on March 24, 2026. At that conference, the parties discussed with Judge
6 Pitts the likelihood of other similar cases being filed (in which Plaintiffs' counsel are involved) and
7 the potential benefits of staying deadlines in those cases pending Judge Pitts' severance ruling in
8 *Cambronne*;

9 WHEREAS, the Parties agree that the statute of limitations on Plaintiffs' claims against
10 Anthropic in the *Cambronne* action shall be tolled for fourteen days after Judge Pitts enters his
11 severance and dismissal order, so that Plaintiffs may refile if necessary against Anthropic alone;

12 WHEREAS, the Parties agree it is reasonable and in the interests of judicial economy to
13 stay all deadlines and proceedings in this matter pending resolution of the various motions to sever
14 that have been filed in the *Cambronne* action, and agree to meet and confer on a schedule to answer
15 the complaint and promptly to submit such a schedule within fourteen days after a severance ruling;

16 WHEREAS, the Parties agree this stipulation does not waive any claim, right, or defense;

17 THEREFORE, the Parties, by and through their respective undersigned counsel, HEREBY
18 STIPULATE AND AGREE, as follows:

19 All deadlines and proceedings in this case are stayed pending Judge Pitts' resolution of the
20 motions to sever in *Cambronne Inc., et al. v. Anthropic PBC, et al.*, Case No. 5:25-cv-10897-PCP
21 (N.D. Cal.);

22 The parties will promptly notify this Court following Judge Pitts' ruling and meet and confer,
23 and absent further order of this Court, the Parties will file a joint statement containing the Parties'
24 proposal or proposals for resuming proceedings in this case, including any amendments to the
25 complaint and Anthropic's deadline to answer, within fourteen days of that ruling.

26 **IT IS SO STIPULATED.**
27
28

1
2 DATED: June 3, 2026

/s/ Yar R. Chaikovsky

WHITE & CASE LLP

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Attorneys for Defendant Anthropic PBC

1 DATED: June 3, 2026

/s/ Elizabeth Brannen

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Counsel for Plaintiffs

ATTESTATION PURSUANT TO LOCAL RULE 5-1(i)(3)

In compliance with Civil Local Rule 5-1(i)(3) regarding signatures, I hereby attest that I have obtained the concurrence in the filing of this document from all signatories.

DATED: June 3, 2026

/s/ Elizabeth Brannen

Elizabeth Brannen (SBN 226234)

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____, 2026

Hon. _____

United States District/Magistrate Judge