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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

THOMAS WILLIAM SHAKESPEARE,
NOLAN BUSHNELL, LAURA ESQUIVEL,
CHARLES GLASS, J. RANDY
TARABORRELLI, ROSE BOOKS, INC.,
TIFFANY ALICHE, KATHY SIERRA,
BERT BATES, VINCE BEISER, CLARA

Case No. 3:26-cv-05931-PCP

**JOINT STIPULATION TO EXTEND
DEFENDANTS' TIME TO
RESPOND TO THE COMPLAINT**

1 BINGHAM, SUSAN BLILER, BARBARA
 2 MARIE BONNEAU, CYLIN BUSBY,
 3 BUSBY ROSS INC., STEPHEN J. CALDAS,
 4 SCOTT CARNEY, ANNE CANADEO,
 5 JORDI CASTELLS, WAHIDA CLARK,
 6 WAHIDA CLARK PRESENTS
 7 PUBLISHING LLC, SUZANNE COPE,
 8 JULIE CROSS, RON CURRIE, JR.,
 9 VICTORIA DAVID, MARCY
 10 DERMANSKY, JIM DIEUGENIO,
 11 ZACHARY SKLAR, JIM DUTCHER, JAMIE
 12 DUTCHER, GINNY DYE, SARAH
 13 EDMONDSON, INC., MARA EINSTEIN,
 14 RIP ESSELSTYN, JANE ESSELSTYN, BEN
 15 L. EVRIDGE, NIR EYAL, JON FINE,
 16 KAREN SIFF EXKORN, ISABELLE
 17 GALLO, STANLEY GINSBERG, REYNA
 18 GOBEL, DAVID GOODMAN, MATT
 19 GROSS, THOMAS GUZMAN-SANCHEZ,
 20 MINAL HAJRATWALA, BRENDA
 21 HAMPTON, DONNA BARBA HIGUERA,
 22 HUMAN RESOURCE DEVELOPMENT
 23 PRESS INC., BUZZY JACKSON, NICK
 24 JAMILLA, K. W. JETER, MATTHEW
 25 KENNEY, PAMELA KEOGH, LYNNETTE
 26 KHALFANI-COX, JOE KONRATH,
 27 MARGARET RATNER KUNSTLER, AS
 28 EXECUTRIX OF THE ESTATE OF
 WILLIAM MOSES KUNSTLER, MELISSA
 LANDERS, LORIE MOEGGENBERG,
 CAREY CORP, MARIE MYUNG-OK LEE,
 JOHN LELAND, BARRON LERNER,
 ARIEL MACARRAN, MAGGIE MACNAB,
 DEBRA BERNDT MALDONADO, ERIN
 SIEGAL MCINTYRE, KAREN
 MCQUESTION, GLEN MERZER, PAMELA
 POPPER, LINDSAY S. NIXON, HANNAH
 NORDHAUS, KATE O'HEARN, RANDAL
 PINKETT, MATTEO PISTONO, BRUCE
 RATNER, AS EXECUTOR OF THE
 ESTATE OF MICHAEL RATNER,
 ANDREW REVKIN, CHRISTOPHER
 RICCI, SARAH ELIZABETH RICHARDS,
 JULIAN RUBINSTEIN, DANNY RUST,
 ALLEN SALKIN, DANIELLE SANTIAGO-
 COFIELD, DEFOREST B. SOARIES, JR.,
 JESSE STAY, GENE STONE, JORDANA
 ROTHMAN, ALEX STUPAK, EMPELLON
 HOLDINGS LLC, KIKI SWINSON,
 NATALIA SYLVESTER, BRENDA L.
 THOMAS, LISA TURNER, LEMUEL (BOO)
 WALKER, PATRICE WASHINGTON, BEN
 WESTHOFF, FLORENCE WILLIAMS,
 DAVID YOUNG, REBECCA ZANETTI, and

Judge: Hon. P. Casey Pitts
 Courtroom 8 – 4th Floor

1 KIRK ZUROSKY,

2 Plaintiffs,

3
4 v.

5 ANTHROPIC, PBC, a Delaware public benefit
6 corporation; DARIO AMODEI, an individual,
and BENJAMIN MANN, an individual,

7 Defendants.
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1 Pursuant to Civil Local Rules 6-1(a), and 7-12, Plaintiffs and Defendants Anthropic, PBC,
2 Dr. Dario Amodei, and Benjamin Mann (together, “Defendants”) through their undersigned counsel,
3 hereby stipulate and declare as follows:

4 WHEREAS, Plaintiffs filed a Complaint on June 17, 2026 (Dkt. 1);

5 WHEREAS, Plaintiffs served Anthropic with the Complaint on June 24, 2026;

6 WHEREAS, Defendants Dario Amodei and Benjamin Mann waived service under Federal
7 Rule of Civil Procedure 4(d), and their current deadline to respond to the Complaint is accordingly
8 August 24, 2026;

9 WHEREAS, Plaintiffs intend to file a First Amended Complaint;

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

11 WHEREAS, the Parties agree that a consented schedule for Plaintiffs to file their First
12 Amended Complaint and for Defendants to file responsive pleadings (including a motion to dismiss)
13 is reasonable and serves the interests of judicial economy and efficiency;

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

16 1. Plaintiffs will file their First Amended Complaint by August 10, 2026;

17 2. Defendants must bring any motion to dismiss or file a responsive pleading to the First
18 Amended Complaint no later than September 11, 2026;

19 3. Defendants reserve all rights to seek a further extension of any answer deadlines;

20 4. As the Court has already ruled, the Joint Case Management Statement is due by
21 September 10, 2026; and the Initial Case Management Conference is set for September 17, 2026 at
22 1:00 PM in San Jose, Courtroom 8, 4th Floor before Judge P. Casey Pitts. Those deadlines are not
23 affected by this stipulation.

1 DATED: July 14, 2026

/s/ Michael P. Manapol

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Attorneys for Plaintiffs

1
2 DATED: July 14, 2026

/s/ Yar R. Chaikovsky

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Attorneys for Defendant Anthropic, PBC

19 DATED: July 14, 2026

/s/ Grace Yang

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HAYK ESAGHOULYAN

*Attorneys for Defendants Dario Amodei and
Benjamin Mann*

L.R. 5-1 SIGNATURE ATTESTATION

As the ECF user whose user ID and password are utilized in the filing of this document, I attest that concurrence in the filing of the document has been obtained from each of the other signatories.

DATED: July 14, 2026

/s/Michael P. Manapol