

WHITE & CASE LLP

YAR R. CHAIKOVSKY (CA 175421)

yar.chaikovsky@whitecase.com

ANDY LEGOLVAN (CA 292520)

andy.legolvan@whitecase.com

AMIR JABBARI (CA 339097)

amir.jabbari@whitecase.com

3000 El Camino Real

2 Palo Alto Square, Suite 900

Palo Alto, CA 94306-2109

Telephone: (650) 213-0300

Facsimile: (650) 213-8158

MARK DAVIES (*pro hac vice* forthcoming)

mark.davies@whitecase.com

701 13th St NW # 600

Washington, DC 20005-3807

Telephone: (202) 626-3600

Facsimile: (202) 639-9355

Attorneys for

Defendant Anthropic, PBC

GRACE YANG (CA Bar No. 286635)

MIRANDA KANE (CA Bar No. 150630)

HAYK ESAGHOULYAN (CA Bar No.

349050)

CONRAD | METLITZKY | KANE LLP

217 Leidesdorff Street

San Francisco, CA 94111

Tel: (415) 343-7100

Fax: (415) 343-7101

Email: gyang@conmetkane.com

mkane@conmetkane.com

hesaghoulyan@conmetkane.com

Attorneys for Dario Amodei and Benjamin

Mann

JAMES H. BARTOLOMEI, III P.A.

James H. Bartolomei III (SBN 301678)

Of Counsel at Duncan Firm, P.A.

Michael P. Manapol (SBN 258300)

809 W. 3rd Street

Little Rock, Arkansas 72201

Telephone: (501) 228-7600

james@duncanfirm.com

michael@manapollaw.com

GAFNI & LEVIN, LLP

Adam I. Gafni, Esq. (SBN 230045)

11811 San Vicente Blvd.

Los Angeles, California 90049

Telephone: (424) 744-8344

adam@gafnilaw.com

DONIGER / BURROUGHS

Stephen M. Doniger (SBN 179314)

Benjamin F. Tookey (SBN 330508)

Andres Navarro (SBN 358499)

603 Rose Avenue

Venice, California 90291

Telephone: (310) 590-1820

stephen@donigerlawfirm.com

btookey@donigerlawfirm.com

anavarro@donigerlawfirm.com

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
BINGHAM, SUSAN BLILER, BARBARA
MARIE BONNEAU, CYLIN BUSBY,
BUSBY ROSS INC., STEPHEN J. CALDAS,

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

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

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

Plaintiffs,

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

1
2 v.

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

5 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 17, 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 18, 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 October 8, 2026; and the Initial Case Management Conference is set for October 15, 2026, at 2:00
22 PM in San Jose, Courtroom 8, 4th Floor before Judge P. Casey Pitts. Those deadlines are not
23 affected by this stipulation.

1 DATED: August 10, 2026

/s/ Michael P. Manapol

MICHAEL P. MANAPOL.

James H. Bartolomei III (SBN 301678)

Of Counsel at Duncan Firm, P.A.

Michael P. Manapol (SBN 258300)

809 W. 3rd Street

Little Rock, Arkansas 72201

Telephone: (501) 228-7600

james@duncanfirm.com

michael@manapollaw.com

GAFNI & LEVIN, LLP

Adam I. Gafni, Esq. (SBN 230045)

11811 San Vicente Blvd.

Los Angeles, California 90049

Telephone: (424) 744-8344

adam@gafnilaw.com

DONIGER / BURROUGHS

Stephen M. Doniger (SBN 179314)

Benjamin F. Tookey (SBN 330508)

Andres Navarro (SBN 358499)

603 Rose Avenue

Venice, California 90291

Telephone: (310) 590-1820

stephen@donigerlawfirm.com

btookey@donigerlawfirm.com

anavarro@donigerlawfirm.com

Attorneys for Plaintiffs

1
2 DATED: August 10, 2026

/s/ Yar R. Chaikovsky

WHITE & CASE LLP

Yar R. Chaikovsky
yar.chaikovsky@whitecase.com
Andy LeGolván
andy.legolvan@whitecase.com
Amir Jabbari
amir.jabbari@whitecase.com
3000 El Camino Real
2 Palo Alto Square, Suite 900
Palo Alto, CA 94306-2109
Telephone: (650) 213-0300
Facsimile: (650) 213-8158

Mark Davies (*pro hac vice* forthcoming)
mark.davies@whitecase.com
701 13th St NW # 600
Washington, DC 2005-3807
Telephone: (202) 626-3600
Facsimile: (202) 639-9355

Attorneys for Defendant Anthropic, PBC

15
16
17
18 DATED: August 10, 2026

/s/ Grace Yang

CONRAD | METLITZKY | KANE LLP

GRACE YANG
MIRANDA KANE
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: August 10, 2026

/s/Michael P. Manapol

Michael P. Manapol

CERTIFICATE OF SERVICE

Pursuant to Civil Local Rule 5-5, I hereby certify that on August 10, 2026, a true and correct copy of the parties' Joint Stipulation To Extend Defendants' Time to Respond to The Complaint was served on all counsel of record listed on the Court's ECF-CM electronic filing system, and via electronic mail to the following individuals who are not registered with the Court's ECF-CM electronic filing system at the email addresses below:

YAR R. CHAIKOVSKY
yar.chaikovsky@whitecase.com
ANDY LEGOLVAN
andy.legolvan@whitecase.com
AMIR JABBARI
amir.jabbari@whitecase.com
3000 El Camino Real
2 Palo Alto Square, Suite 900
Palo Alto, CA 94306-2109

MARK DAVIES (*pro hac vice* forthcoming)
mark.davies@whitecase.com
701 13th St NW # 600
Washington, DC 2005-3807

Attorneys for
Defendant Anthropic, PBC

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 10, 2026.

/s/Michael P. Manapol

Michael P. Manapol