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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

THOMAS WILLIAM SHAKESPEARE,
ET AL.,

Plaintiffs,

v.

ANTHROPIC, PBC, ET AL.,

Defendants.

Case No. 5:26-cv-05931-PCP

**DECLARATION OF GRACE YANG IN
SUPPORT OF DEFENDANT BENJAMIN
MANN'S MOTION TO EXTEND UNDER
CIVIL LOCAL RULE 6-3**

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

1 I, Grace Yang, hereby declare:

2 1. I am a partner at the law firm of Conrad | Metlitzky | Kane LLP, and I am counsel of record
3 for Defendants Benjamin Mann and Dr. Dario Amodei in the above-captioned matter. I am licensed to
4 practice law in the state of California and this Court. I have personal knowledge of the following facts
5 and, if called to testify in this matter, I could and would testify competently to the matters stated herein.
6 I make this declaration in support of Mr. Mann's motion to extend under Civil Local Rule 6–3.

7 2. This matter was filed on June 16, 2026 and assigned to the Court on July 7.
8 Dkt. Nos. 1, 25. Also, on July 7, 2026, the Court reset the case management conference for September 17,
9 2026. Dkt. No. 26.

10 3. Following review of Plaintiff's Complaint, I decided that, while both Mr. Mann and
11 Dr. Amodei contest Plaintiffs' allegations, only Dr. Amodei would move to dismiss at this juncture.

12 4. On July 1, 2026, I met and conferred by videoconference with opposing counsel regarding
13 Defendants' answer deadlines.

14 5. On July 10, 2026, Anthropic's counsel, with my approval, circulated to opposing counsel
15 a stipulation that extended Defendants' answer deadlines and aligned all Defendants' answer deadlines in
16 light of Dr. Amodei and Anthropic's decision to move to dismiss. Attached as **Exhibit A** is a true and
17 correct copy of defense counsel's emails to opposing counsel.

18 6. That same day, opposing counsel declined to align Mr. Mann's answer deadline with those
19 of Dr. Amodei and Anthropic.

20 7. On July 14, 2026, I met and conferred by videoconference with opposing counsel for a
21 second time. During that videoconference, Plaintiffs indicated that they planned to file an Amended
22 Complaint, and the parties ultimately stipulated that Plaintiffs will amend by August 10, 2026, and
23 Defendants will bring any responsive pleading to the First Amended Complaint by September 11, 2026.
24 See Dkt. No. 27 at 4.

25 8. During that same call, I again proposed aligning Mr. Mann's response deadline with those
26 of the remaining Defendants. I explained to opposing counsel that, because Mr. Mann does not anticipate
27 filing a motion to dismiss, Defendants will be placed on different response timelines, creating
28

inefficiencies for discovery and case management, in part because of the intertwined allegations advanced against Mr. Mann and his co-defendants. I therefore again proposed that Mr. Mann's response deadline be extended to after the Court's decision on the other Defendants' expected motions to dismiss. Opposing counsel again rejected that proposal.

9. On August 10, the parties stipulated to a week-long extension to the above schedule, with Plaintiffs' to file a First Amended Complaint by August 17, 2026, and Defendants to bring responsive pleadings by September 18, 2026. Dkt. No. 32.

10. Separately, on August 5, the Court reset the Initial Case Management Conference from September 17 to October 15, 2026. Dkt. No. 31.

11. Plaintiffs have not served any discovery requests on Mr. Mann or any other party in this case.

12. The requested time modification would not delay or otherwise affect any other current case deadlines.

13. Other than as noted above, there have been no other time modifications in this case, whether by stipulation or by Court order.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 28th day of August 2026, in Berkeley, California.


GRACE YANG