

Exhibit A

From: [James Bartolomei](#)
To: [Jabbari, Amir](#); [Michael Manapol](#); stephen@donigerlawfirm.com; btookey@donigerlawfirm.com; anavarro@donigerlawfirm.com; adam@gafnilaw.com
Cc: [Miranda Kane](#); [Grace Yang](#); [Hayk Esaghoulyan](#); [Chaikovsky, Yar](#); [LeGolvan, Andy](#); [Naydonov, Anna](#); [Cadence Havniear](#); [Ashley Duncan](#); [Richard Quintus](#)
Subject: RE: Shakespeare v. Anthropic et al, Case No. 3:26-cv-5931 (Scheduling)
Date: Monday, July 13, 2026 9:51:52 AM
Attachments: image002.png
image004.png
image005.png
Shakespeare - Joint Stipulation to Extend Time - JHB edits.docx

Dear Counsel,

During the meet and confer on July 1, we only discussed a joint response date of August 24 for all defendants, which Plaintiffs consented. The Rule 26(f) schedule must proceed as currently set for September 17. Plaintiffs do not agree to tie discovery to a motion to dismiss or answer date. Attached are edits to the draft stipulation. If acceptable, please confirm and Plaintiffs will get it filed. Thank you.

James H. Bartolomei, Esq.
Of Counsel



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I am licensed to practice law before the state courts in California, New York, Connecticut, Arkansas, Florida, and DC. Federal bars include the Eastern District of Arkansas, Western District of Arkansas, Southern District of New York, Eastern District of New York, Western District of New York, Central District of California, Northern District of California, Eastern District of California, Southern District of Florida, District of Colorado, District of Columbia, Northern District of Texas, Eastern District of Texas, Western District of Texas, Southern District of Texas, US Court of Federal Claims, Ninth Circuit Court of Appeals,

Second Circuit Court of Appeals, Eleventh Circuit Court of Appeals & US Supreme Court.

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From: Jabbari, Amir <amir.jabbari@whitecase.com>

Sent: Friday, July 10, 2026 6:30 PM

To: James Bartolomei <James@duncanfirm.com>; Michael Manapol <michael@manapollaw.com>; stephen@donigerlawfirm.com; btookey@donigerlawfirm.com; anavarro@donigerlawfirm.com; adam@gafnilaw.com

Cc: Miranda Kane <mkane@conmetkane.com>; Grace Yang <gyang@conmetkane.com>; Hayk Esaghoullyan <HEsaghoullyan@conmetkane.com>; Chaikovsky, Yar <yar.chaikovsky@whitecase.com>; LeGolvan, Andy <andy.legolvan@whitecase.com>; Naydonov, Anna <anna.naydonov@whitecase.com>

Subject: RE: Shakespeare v. Anthropic et al, Case No. 3:26-cv-5931 (Scheduling)

Counsel:

As discussed, attached is a joint stipulation aligning all Defendants' response deadlines to August 24. If the draft works for you, let us know whose name should go on the signature line and we can file Monday.

Thanks,

Amir

Amir Jabbari | Associate

T +1 6505196488 E amir.jabbari@whitecase.com

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WHITE & CASE

-----Original Appointment-----

From: James Bartolomei <James@duncanfirm.com>

Sent: Tuesday, June 30, 2026 5:29 AM

To: Naydonov, Anna; Michael Manapol; stephen@donigerlawfirm.com;
btookey@donigerlawfirm.com; anavarro@donigerlawfirm.com; adam@gafnilaw.com; Grace Yang
Cc: Miranda Kane; Hayk Esaghoulyan; Chaikovsky, Yar; LeGolván, Andy; Jabbari, Amir
Subject: [EXT] Shakespeare v. Anthropic et al, Case No. 3:26-cv-5931 (Scheduling)
When: Wednesday, July 1, 2026 3:00 PM-3:30 PM (UTC-06:00) Central Time (US & Canada).
Where: <https://duncanfirm.zoom.us/j/86419728435?pwd=pT9TcsOph0FPNkfNWEafdwbuSgl5hl.1>

1pm PT/3pm CT/4pm ET

[https://duncanfirm.zoom.us/j/86419728435?
pwd=pT9TcsOph0FPNkfNWEafdwbuSgl5hl.1](https://duncanfirm.zoom.us/j/86419728435?pwd=pT9TcsOph0FPNkfNWEafdwbuSgl5hl.1)

Meeting ID: 864 1972 8435
Passcode: 078564

One tap mobile

+13126266799,,86419728435# US (Chicago)

+16469313860,,86419728435# US

Join by SIP

• 86419728435@zoomcrc.com

Join instructions

[https://duncanfirm.zoom.us/meetings/86419728435/invitations?
signature=gfvaQsJ3TBkDdpO2CFErHejPnUO24jqIVH8PDvMQCrg](https://duncanfirm.zoom.us/meetings/86419728435/invitations?signature=gfvaQsJ3TBkDdpO2CFErHejPnUO24jqIVH8PDvMQCrg)

From: Naydonov, Anna <anna.naydonov@whitecase.com>

Sent: Tuesday, June 30, 2026 7:24 AM

To: James Bartolomei <James@duncanfirm.com>; Michael Manapol <michael@manapollaw.com>;
stephen@donigerlawfirm.com; btookey@donigerlawfirm.com; anavarro@donigerlawfirm.com;
adam@gafnilaw.com

Cc: Grace Yang <gyang@conmetkane.com>; Miranda Kane <mkane@conmetkane.com>; Hayk

Esaghoulyan <HEsaghoulyan@conmetkane.com>; Chaikovsky, Yar
<yar.chaikovsky@whitecase.com>; LeGolván, Andy <andy.legolvan@whitecase.com>; Jabbari, Amir
<amir.jabbari@whitecase.com>

Subject: RE: Shakespeare v. AnthropiC et al, Case No. 3:26-cv-5931

Thanks, James.

The proposed time works for AnthropiC and the individual Defendants. Please circulate a dial-in.

Best, Anna

Anna Naydonov | Partner

T +1 202 637 6197 M +1 202 716 4034 E anna.naydonov@whitecase.com

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WHITE & CASE

From: James Bartolomei <James@duncanfirm.com>

Sent: Monday, June 29, 2026 5:57 PM

To: Naydonov, Anna <anna.naydonov@whitecase.com>; Michael Manapol
<michael@manapolaw.com>; stephen@donigerlawfirm.com; btookey@donigerlawfirm.com;
anavarro@donigerlawfirm.com; adam@gafnilaw.com

Cc: Grace Yang <gyang@conmetkane.com>; Miranda Kane <mkane@conmetkane.com>; Hayk
Esaghoulyan <HEsaghoulyan@conmetkane.com>; Chaikovsky, Yar
<yar.chaikovsky@whitecase.com>; LeGolván, Andy <andy.legolvan@whitecase.com>; Jabbari, Amir
<amir.jabbari@whitecase.com>

Subject: [EXT] RE: Shakespeare v. AnthropiC et al, Case No. 3:26-cv-5931

Good Afternoon Anna,

Nice to meet you. We have availability on Wednesday July 1 afternoon PT time. How is 1pm PT for AnthropiC and the individual defendants? I can circulate a Zoom invite.

Thanks,

James H. Bartolomei, Esq.
Of Counsel



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From: Naydonov, Anna <anna.naydonov@whitecase.com>

Sent: Friday, June 26, 2026 1:50 PM

To: James Bartolomei <James@duncanfirm.com>; Michael Manapol <michael@manapollaw.com>;
stephen@donigerlawfirm.com; btookey@donigerlawfirm.com; anavarro@donigerlawfirm.com;
adam@gafnilaw.com

Cc: Grace Yang <gyang@conmetkane.com>; Miranda Kane <mkane@conmetkane.com>; Hayk Esaghoullyan <HEsaghoullyan@conmetkane.com>; Chaikovsky, Yar
<yar.chaikovsky@whitecase.com>; LeGolvan, Andy <andy.legolvan@whitecase.com>; Jabbari, Amir
<amir.jabbari@whitecase.com>

Subject: Shakespeare v. Anthropic et al, Case No. 3:26-cv-5931



IRONSCALES couldn't recognize this email as this is the first time you received an email from this sender anna.naydonov@whitecase.com

Counsel,

We have just been retained to represent Anthropic in the above-captioned case. I am also copying counsel for Dario Amodei and Benjamin Mann from CMK.

We think it makes sense to align the response deadlines for all the defendants. Please let us know if you agree to extend the deadline for Anthropic until August 24, 2026 to file a responsive pleading.

We would also like to set up a time to discuss the response deadlines and scheduling generally. Please let us know your availability early next week. Thanks.

Best, Anna

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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

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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,
SCOTT CARNEY, ANNE CANADEO,
JORDI CASTELLS, WAHIDA CLARK,
WAHIDA CLARK PRESENTS
PUBLISHING LLC, SUZANNE COPE,
JULIE CROSS, RON CURRIE, JR.,
VICTORIA DAVID, MARCY
DERMANSKY, JIM DIEUGENIO,
ZACHARY SKLAR, JIM DUTCHER, JAMIE
DUTCHER, GINNY DYE, SARAH
EDMONDSON, INC., MARA EINSTEIN.

Case No. 3:26-cv-05931

**JOINT STIPULATION TO EXTEND
ANTHROPIC'S TIME TO
RESPOND TO THE COMPLAINT**

Judge: Hon. P. Casey Pitts

Courtroom 8 – 4th Floor

RIP ESSELSTYN, JANE ESSELSTYN, BEN L. EVRIDGE, NIR EYAL, JON FINE, KAREN SIFF EXKORN, ISABELLE GALLO, STANLEY GINSBERG, REYNA GOBEL, DAVID GOODMAN, MATT GROSS, THOMAS GUZMAN-SANCHEZ, MINAL HAJRATWALA, BRENDA HAMPTON, DONNA BARBA HIGUERA, HUMAN RESOURCE DEVELOPMENT PRESS INC., BUZZY JACKSON, NICK JAMILLA, K. W. JETER, MATTHEW KENNEY, PAMELA KEOGH, LYNNETTE KHALFANI-COX, JOE KONRATH, MARGARET RATNER KUNSTLER, AS 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, EMPPELLON 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 KIRK ZUROSKY,

Plaintiffs,

v.

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

Defendants.

1 Pursuant to Civil Local Rules 6-1(a), and 7-11, Plaintiffs and Defendants Anthropic, PBC,
2 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 deadline to respond to the Complaint is accordingly August
8 24, 2026;

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

10 WHEREAS, the Parties agree that an extension of time for Anthropic to file a responsive
11 pleading (including a motion to dismiss) is reasonable and serves the interests of judicial economy
12 and efficiency;

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

15 1. Defendants must bring any motion to dismiss by no later than August 24, 2026;

16 2. Defendants must answer the Complaint as needed within five weeks after the Court's
17 order deciding any motion to dismiss;

18 3. The parties' joint Rule 26(f) report is due within five weeks after the Court's order
19 deciding any motion to dismiss.

1
2 DATED: July , 2026

/DRAFT/

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Attorneys for Plaintiffs

1
2 DATED: July 13, 2026

/DRAFT/ Yar R. Chaikovsky

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Attorneys for Defendant Anthropic PBC

1
2 DATED: July 13, 2026

/DRAFT/

3 **CONRAD | METLITZKY | KANE LLP**

4 GRACE YANG

MIRANDA KANE

HAYK ESAGHOULYAN

5 *Attorneys for Defendants Dario Amodei and*
6 *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 , 2026

/DRAFT/