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Defendant Anthropic PBC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THOMAS WILLIAM SHAKESPEARE, ET
AL.,

Plaintiffs,

v.

ANTHROPIC, PBC, ET AL.,

Defendants.

Case No. 5:26-cv-5931-PCP

**DECLARATION OF ANDY
LEGOLVAN IN SUPPORT OF
DEFENDANT ANTHROPIC
PBC'S MOTION TO DISMISS
PLAINTIFFS' FIRST AMENDED
COMPLAINT**

Judge: Hon. P. Casey Pitts

1 I, Andy LeGolván, hereby declare:

2 1. I am an active member in good standing of the bar of the State of California, and I am
3 admitted to practice in the United States District Court for the Northern District of California. I am
4 Counsel in the law firm of White & Case LLP and counsel of record for Defendant Anthropic PBC.
5 I have personal knowledge of the facts set forth herein. I have personal knowledge of the matters
6 stated below, or knowledge based on my review of the records described below and on work
7 performed at my direction by attorneys and staff under my supervision. If called as a witness, I
8 could and would testify competently to these matters.

9 ***Copyright Registrations***

10 2. At my direction, attorneys and staff under my supervision retrieved the copyright
11 registrations for the works identified in Exhibit A to the operative First Amended Complaint. The
12 registrations were retrieved from the U.S. Copyright Office public records catalog at
13 <https://publicrecords.copyright.gov/>.

14 3. Attached as **Exhibit 1** are true and correct copies of 67 registrations that name as
15 claimant a person or entity that is not a plaintiff in the action asserting that work. Exhibit 1 also
16 includes a chart of the registrations for ease of reference, listing information from those
17 registrations.

18 4. Attached as **Exhibit 2** are true and correct copies of 27 registrations that name the
19 asserting plaintiff as a claimant together with at least one co-claimant that is not a party to this
20 action. Exhibit 2 also includes a chart of the registrations for ease of reference, listing information
21 from those registrations.

22 5. Attached as **Exhibit 3** are true and correct copies of 141 registrations that identify as
23 the rights and permissions contact a publisher or other organization that is not a party to these
24 actions. Exhibit 3 also includes a chart of the registrations for ease of reference, listing information
25 from those registrations.

26 ***Bartz Settlement***

27 6. At my direction, attorneys and staff under my supervision searched the Works List
28 lookup tool for *Bartz v. Anthropic PBC*, No. 3:24-cv-05417-AMO (N.D. Cal.) (“Bartz”), at

1 <https://secure.anthropiccopyrightsettlement.com/lookup>, for each work identified in Exhibit A to
2 the operative First Amended Complaint. The searches identified the asserted works that appear on
3 the *Bartz* Works List. Among those are eight asserted works, which, as described below, were not
4 opted out of the *Bartz* class. True and correct copies of screenshots of the search results for those
5 works are attached as **Exhibit 4**.

6 7. At my direction, an attorney under my supervision asked JND Legal Administration,
7 the Settlement Administrator of the *Bartz* settlement, for a list of the works as to which a request
8 to opt out of the *Bartz* settlement was submitted. Nicole Christ, JND's Senior Vice President of
9 Operations, provided that list by email on March 26, 2026.

10 8. At my direction, attorneys under my supervision compared the asserted works
11 appearing on the *Bartz* Works List against the opt-out list. Eight asserted works appear on the *Bartz*
12 Works List and do not appear on the opt-out list. Attached as **Exhibit 5** is a chart prepared at my
13 direction identifying those eight works for ease of reference.

14 I declare under penalty of perjury of the laws of the United States that the foregoing is true
15 and correct.

16 Dated: September 18, 2026

/s/ Andy LeGolvan

Andy LeGolvan