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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

**DEFENDANT BENJAMIN MANN'S
NOTICE OF JOINDER AND JOINDER IN
DEFENDANT ANTHROPIC, PBC'S
MOTION TO DISMISS PLAINTIFFS'
FIRST AMENDED COMPLAINT**

Judge: Hon. P. Casey Pitts

1 **PLEASE TAKE NOTICE** that, pursuant to Rules 12(b)(1) and 12(b)(6) of the Federal Rules of
 2 Civil Procedure, on November 19, 2026 at 10:00 a.m., or as soon thereafter as this matter may be heard,
 3 Defendant Benjamin Mann will and hereby does move this Court to dismiss Plaintiffs' claims against him
 4 under Rule 12(b)(6), to the extent stated in Defendant Anthropic, PBC's ("Anthropic") Notice of Motion
 5 and Motion to Dismiss Plaintiffs' First Amended Complaint ("MTD").

6 This notice is based on this Notice of Joinder and Joinder, Anthropic's MTD and its accompanying
 7 Memorandum of Points and Authorities in support thereof (Dkt. No. 48), the pleadings and papers on file
 8 in this action, any matter of which this Court may take judicial notice, and on such other written and oral
 9 argument as may be presented to the Court.

10 Mr. Mann joins in, adopts, and incorporates by reference the legal arguments and factual positions
 11 as set forth in Anthropic's MTD that apply to him. Specifically, the arguments made in Section IV of
 12 Anthropic's Memorandum of Points and Authorities apply equally to Mr. Mann, including, for example,
 13 that several works cannot sustain any claim in the present case because they were covered by the judgment
 14 in *Bartz v. Anthropic* and that case's class-wide settlement release (which included Anthropic as well as
 15 its principals, employees, and representatives); other works are owned by third parties; Plaintiffs' asserted
 16 claims are untimely under the Copyright Act's statute of limitations; and as to their Count I, Plaintiffs do
 17 not plausibly allege distribution. *See* Dkt. No. 48 at 4–20. Plaintiffs fail to make sufficient factual
 18 allegations that can overcome these arguments.

19 Accordingly, Mr. Mann respectfully requests that the Court dismiss Plaintiffs' claims as to him, to
 20 the extent stated in Anthropic's MTD.

21
 22 Dated: September 18, 2026

Respectfully submitted,

23 **CONRAD | METLITZKY | KANE LLP**

24 /s/ Grace Yang

25 GRACE YANG

26 MIRANDA KANE

HAYK ESAGHOULYAN

27 *Attorneys for Defendant*

28 BENJAMIN MANN