EXHIBIT A

Richard S. Busch (SBN 319881)
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SKAGGS FAUCETTE LLP
505 Montgomery Street, 11th Floor
San Francisco CA 94111
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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

ROUND HILL MUSIC LP; ROUND HILL MUSIC ROYALTY FUND II, LP; ROUND HILL MUSIC ROYALTY FUND III, LP; ROUND HILL MUSIC ROYALTY FUND III PLUS, LP; GFP CO-INVEST, LP, and RH CARLIN HOLDINGS LLC, Plaintiffs, v. ANTHROPIC PBC, Defendant.	Case Number: 5:26:cv-8505-EKL **OBJECTION TO JOINT CASE MANAGEMENT STATEMENT FILED IN RELATED CASES** **DEMAND FOR JURY TRIAL**

Plaintiffs, Round Hill Music LP, Round Hill Music Royalty Fund II, LP, Round Hill Music Royalty Fund III, LP, Round Hill Music Royalty Fund III Plus, LP, GFP Co-Invest, LP, and RH Carlin Holdings LLC (collectively "Round Hill") hereby provide this objection to the Joint Case Management Statement filed by Anthropic PBC ("Anthropic") and the Plaintiffs in the related cases, *Concord Music Group Inc., et al. v. Anthropic PBC, et al.* Case No. 5:26-cv-00880-EKL-SVK and *BMG Rights Management (US) LLC v. Anthropic PBC*, Case No. 5:26-cv-02334-EKL-SVK (the "Related Cases"), Doc. No. 133.

In this Joint Case Management Statement, Anthropic proposed, "[c]oordination of discovery between the four related cases (*Concord II, BMG, Round Hill,* and *SMP-WCM*) for both Phase I and Phase II" (Doc. No. 133 at p. 17) and other discovery-related limitations that would affect discovery in this case, like "The Plaintiffs in the four related cases (*Concord II, BMG, Round Hill,* and *SMP-WCM*) will constitute a single "side" for purposes of the deposition limits;" a 120-hour limit to depositions "for all party depositions" excluding expert witnesses; each individual counting three (3) hours regardless of time, etc. (*id.* at p. 18).

However, Anthropic made this suggestion without *ever* meeting and conferring with counsel for Round Hill. Since September 3, 2026, Counsel for Round Hill has requested times for a Rule 26(f) Conference. Counsel for Anthropic denied those requests, eventually stating "we have been working on a case management statement in the related cases that is due September 30. We're happy to discuss timing of the Rule 26(f) conference after the filing of that statement…". (*See* Ex. 3).

On October 7, 2026, Round Hill wrote to Anthropic's counsel to inform them of Round Hill's objection. (Ex. 1). Anthropic's counsel responded on October 9, 2026, stating "[t]hroughout the drafting of the Joint Case Management Statement, Anthropic made clear that all four related cases…should be coordinated for purposes of discovery and requested *Round Hill* be included." (Ex. 2).

However, this cannot be true, given again, Anthropic's counsel declined all of Round Hill's requests to have a Rule 26(f) conference until "*after* the filing of that statement" (Ex. 3) (emphasis added). Anthropic further contended in response to Round Hill's requests to amend the Joint Case Management Statement in light of Round Hill's objections that it asked "only that the Court order

coordination" (Ex. 2). However, this also cannot be accurate given the aforementioned material limitations it was requesting for discovery globally, including, as applicable a 120 hour total limit for "all four plaintiffs" and that all plaintiffs from the four related would constitute "one side" for calculating the total number of permissible depositions meaning that Anthropic and its Co-Defendants (its CEO and co-Founder, both still with the company) would get ten depositions, and all and the plaintiffs for the four related cases – a total of 57 plaintiffs[1]– would have to split ten depositions between them.

Again, Anthropic made this suggestion that materially affects Round Hill's discovery rights to the Court while denying all requests from Round Hill to have a Rule 26(f) Conference citing the need to file this statement.

Accordingly, Round Hill objects to Anthropic's request made in the related cases, and respectfully requests that the Court delay entering any order that effects the scheduling or discovery in this action until Anthropic fulfills its obligations under Rule 26 and until the Parties in the above-captioned action submit their own Joint Case Management Statement.[2]

Dated: October 16, 2026

/s/ Richard S. Busch

ADAMS & REESE, LLP
Richard S. Busch (SBN 319881)
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Andrew H. "Drew" Davis (admitted *pro hac vice*)
David Niemierzycki (admitted *pro hac vice*)
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[1] *Round Hill* has six discrete Plaintiff-entities; *Concord II* has fifteen discrete Plaintiff-entities along with multiple further d/b/a's; *BMG* has one discrete plaintiff-entity with multiple d/b/a's; and *SMP-WC* has thirty-five discrete plaintiff-entities.

[2] Plaintiffs' counsel has advised Anthropic that it will be filing an Amended Complaint by October 23, 2026. The Parties are working on a Stipulation currently that contains a response date and briefing schedule for a potential motion to dismiss, as well as a request to adjourn the initial Case Management Conference in light of the filing of an Amended Complaint.

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Attorneys for Plaintiffs

FILER'S ATTESTATION

I, Richard S. Busch, am the ECF user whose identification and password are being used to file the foregoing document. In compliance with Local Rule 5-1(i)(3), I hereby attest that all signatories hereto concur in this filing.

/s/ Richard S. Busch

EXHIBIT 1

Richard Busch
Counsel

1600 West End Avenue, Suite #1400
Nashville, TN 37203
E: Richard.Busch@arlaw.com
O: 615.259.1452

October 7, 2026

Via Email:
Wilmer Hale
Jared V. Grubow jared.grubow@wilmerhale.com
Sonal Mehta sonal.mehta@wilmerhale.com
Louis W. Tompros louis.tompros@wilmerhale.com
Ari Holtzblatt ari.holtzblatt@wilmerhale.com
Alex Miller alex.miller@wilmerhale.com
Robin Burrell robin.burrell@wilmerhale.com

Re: *Round Hill Music LP, et al. v. Anthropic PBC*, 5:26-cv-08505-EKL

Counsel,

This acknowledges receipt of the Joint Case Management Statement filed in the BMG and Concord cases which you recently forwarded to us without comment.

We must object to the Defendants' filing of a proposal that affects our clients in a fundamental way for hearing in a case in which you well know we are not a party. Round Hill has been requesting dates for a Rule 26(f) conference for over a month. Your response was to delay having that conference, citing, *inter alia*, the need to have this joint case management statement filed first. *See* Grubow email 9/22 ("**As I mentioned in my email response to you yesterday, we have been working on a case management statement in the related cases that is due September 30. We're happy to discuss timing of the Rule 26(f) conference after the filing of that statement**, which may better inform the substance of that call. Given the Court's decision to set the initial CMC for December 16, that should give the parties plenty of time.") (emphasis added).

So, to discover that said Joint Statement expressly contemplated the timing of discovery and other matters contemplated to be discussed pursuant to Rule 26 in *Round Hill* was disheartening to say the least.

We are thankful that the Plaintiffs in these cases noted to the Court the impropriety of affecting the *Round Hill* case without our consent or participation, as clearly Anthropic's proposals that affect *Round Hill* are improper as they go well beyond innocuous proposals to generally coordinate discovery deadlines. Rather, material discovery rights would be affected, e.g. suggesting that the plaintiffs in ***all four*** related cases "will constitute a single 'side' for purposes of the deposition limits" (DE 133 at 18:3-4). Such a proposal was made without our knowledge. And, as discussed above, Anthropic made this suggestion while rebuffing our efforts to discuss

said matters for over a month. Worse, Anthropic's suggestion would *quarter* the number of depositions we would be able to take normally under the rules. Further, the proposed case management conference provides for a stay of discovery pending the resolution of summary judgment in *Concord I*. DE 133 at 14:5-14. Without any discussion with Round Hill, Anthropic seeks, under the guise of "coordinating discovery" to effectively have the Court issue a stay of discovery in our case without our participation. Other examples of material effect to Round Hill's rights under the discovery rules within Anthropic's proposal are legion. And these are compounded by the fact that the filing is styled as a "Joint" Case Management Statement which could give the false impression that Round Hill participated in the pre-filing discussions and/or signed off on the proposal.

We reserve the right to inform the Court of the above and of our objection to the attempt to raise and resolve fundamental issues in our litigation without our participation.

Very truly yours,

ADAMS & REESE, LLP

Richard S. Busch

cc: Mark Block
Marty Glick
Jeffrey Faucette
Drew Davis
David Niemiezycki

EXHIBIT 2

WILMERHALE

October 9, 2026

Sonal N. Mehta

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sonal.mehta@wilmerhale.com

VIA EMAIL

Richard Busch
Adams & Reese
1600 West End Avenue
Suite #1400
Nashville, TN 37203

Re: *Round Hill Music LP, et al. v. Anthropic PBC*, 5:26-cv-08505-EKL

Counsel:

We write in response to your October 7, 2026 letter regarding the Joint Case Management Statement filed in *Concord Music Group, Inc., et al. v. Anthropic PBC, et al.*, Case No. 5:26-cv-00880-EKL-SVK ("*Concord II*") *and BMG Rights Management (US) LLC v. Anthropic PBC*, Case No. 5:26-cv- 02334-EKL-SVK ("*BMG*").

We disagree with the characterizations in your letter. As Anthropic has made clear from the outset, the *Round Hill* action concerns substantially the same parties, property, transactions, and events as *Concord II* and *BMG* and the purpose of relation is to "enable[e] coordinated discovery and case management across the three cases." *Concord Music Group, Inc., et al. v. Anthropic PBC*, Case No. 5:24-cv-003811-EKL-SVK ("*Concord I*"), ECF No. 786 (Anthropic's Administrative Motion to Consider Whether Cases Should be Related). Throughout the drafting of the Joint Case Management Statement, Anthropic made clear that all four related cases—*Round Hill*, *Concord II*, *BMG*, and *Sony*—should be coordinated for purposes of discovery and requested *Round Hill* be included. Publishers in the other actions took the position that *Sony* should be coordinated, but not *Round Hill*, and elected not to include the *Round Hill* Plaintiffs in the conferral. Anthropic asked only that the Court order coordination between the four cases for purposes of discovery to avoid duplication and promote efficiency, and has offered to submit a revised statement that includes Round Hill, to the extent it would aid the Court.

You are incorrect that Anthropic seeks to "stay" discovery. Discovery in *Concord II* and *BMG* has commenced, as detailed in the Joint Case Management Statement. The cases are factually overlapping and coordination of that phased discovery is appropriate. In filing the Joint Case Management Statement, Anthropic has simply sought that coordination from the Court. To facilitate that coordination, we are sending, alongside this letter, you and counsel in *Sony* a proposed stipulation to coordinate all four cases such that Round Hill can participate in the Phase I discovery that is now ongoing in *Concord II* and *BMG*.

We look forward to productive discussion with Round Hill.

Sincerely,

/s/ Sonal N. Mehta
Sonal N. Mehta

Enclosure

EXHIBIT 3

ADAMS & REESE

Richard Busch
Counsel

October 9, 2026

Via Email:
Wilmer Hale
Sonal N. Mehta sonal.mehta@wilmerhale.com
Jared V. Grubow jared.grubow@wilmerhale.com
Louis W. Tompros louis.tompros@wilmerhale.com
Ari Holtzblatt ari.holtzblatt@wilmerhale.com
Alex Miller alex.miller@wilmerhale.com
Robin Burrell robin.burrell@wilmerhale.com

Re: *Round Hill Music LP, et al. v. Anthropic PBC*, 5:26-cv-08505-EKL

Counsel,

We acknowledge receipt of your response letter to our October 7, 2026 letter dated today, October 9, 2026.

In your letter, you state "[t]hroughout the drafting of the Joint Case Management Statement, Anthropic made clear that all four related cases…should be coordinated for purposes of discovery and requested *Round Hill* be included." We, however, were not part of any such discussions, and in fact you refused to meet and confer with us in our case, despite numerous requests, until after you completed the Joint Case Management Statement in the Concord and BMG cases. Indeed, as the Plaintiffs in the related cases noted, Round Hill took no part in the drafting of the Joint Case Management Statement. *See* DE 133 at 16:15-16.

It is, thus, difficult to square Anthropic's position that Round Hill should be included in the discussions while simultaneously refusing to meet and confer with us on discovery issues until after the filing of the JCMS in the related cases. On September 3, 2026, I wrote to you, following the Court's Order relating the cases, requesting to enter into a stipulated protective order to avoid relitigating past disputes. Hearing no response, I followed up on September 8, 2026. Mr. Grubow responded that same day advising Anthropic was happy to have that discussion when the parties met and conferred in advance of the JCMS due December 2. My colleagues Drew Davis and Mark Block followed up again requesting dates for the 26(f) conference on September 15, 18, 21, and 22, 2026.

We received emails from Mr. Grubow on September 21 and 22 in which he stated in both that Anthropic was working on the case management statement in the other cases and said, **"We're happy to discuss timing of the Rule 26(f) conference after the filing of that statement**."

Accordingly, we are confused how Anthropic could report to the Court that it believed Round Hill should be included in the drafting of the Case Management Statement while telling Round Hill that it preferred to wait until *after* said Statement was filed to meet and confer under Rule 26(f).

Further, your characterization that Anthropic simply "asked only that the Court order coordination" is belied by the plain language of the Case Management Statement wherein, as discussed in my previous Letter, Anthropic also requested the Court effectively quarter the number of depositions Round Hill and the other Plaintiffs would be able to take. There are also other proposed limits regarding depositions and discovery that Anthropic clearly means to be applicable to *Round Hill*.

We appreciate you sending the stipulation, however we cannot enter into this stipulation without having an earnest meet and confer about discovery issues, and how aligning discovery might impact our case so that we can have those conversations with our Client. We posit that a good first step would be the stipulated protective order which we have been asking for over a month to enter.

Very truly yours,

ADAMS & REESE, LLP

Richard S. Busch

cc: Mark Block
Marty Glick
Jeffrey Faucette
Drew Davis
David Niemiezycki

Drew Davis

From: Grubow, Jared V. <Jared.Grubow@wilmerhale.com>
Sent: Monday, September 21, 2026 12:41 PM
To: Drew Davis; Mark Block; Mehta, Sonal; Tompros, Louis W.; Holtzblatt, Ari; Burrell, Robin C.; Miller, Alex W.; whanthropic-RoundillService@wilmerhale.com
Cc: Richard Busch; David Niemierzycki; jeff; marty; Delia Carr
Subject: RE: Round Hill Music LP, et al. v. Anthropic PBC, Case No. 3:26-cv-08505-CRB - request for Protective Order

Drew,

Thank you for your email and apologies for the delay in getting back to you. We have been working on a case management statement in the related cases that is due September 30. We're happy to discuss timing of the Rule 26(f) conference after the filing of that statement, which may better inform the substance of that call. Given the Court's decision to set the initial CMC for December 16, that should give the parties plenty of time.

Best,
Jared

From: Drew Davis <Drew.Davis@arlaw.com>
Sent: Monday, September 21, 2026 12:23 PM
To: Mark Block <Mark.Block@arlaw.com>; Grubow, Jared V. <Jared.Grubow@wilmerhale.com>; Mehta, Sonal <Sonal.Mehta@wilmerhale.com>; Tompros, Louis W. <Louis.Tompros@wilmerhale.com>; Holtzblatt, Ari <Ari.Holtzblatt@wilmerhale.com>; Burrell, Robin C. <Robin.Burrell@wilmerhale.com>; Miller, Alex W. <Alex.Miller@wilmerhale.com>; whanthropic-RoundillService@wilmerhale.com
Cc: Richard Busch <Richard.Busch@arlaw.com>; David Niemierzycki <David.Niemierzycki@arlaw.com>; jeff <jeff@skaggsfaucette.com>; marty <marty@skaggsfaucette.com>; Delia Carr <Delia.Carr@arlaw.com>
Subject: RE: Round Hill Music LP, et al. v. Anthropic PBC, Case No. 3:26-cv-08505-CRB - request for Protective Order

EXTERNAL SENDER

Counsel,

Respectfully following up again. I understand there are many moving pieces, and we are all quite busy, but it has been several days since we have asked for some potential dates for the 26(f) conference.

From: Mark Block <Mark.Block@arlaw.com>
Sent: Friday, September 18, 2026 12:14 PM
To: jared.grubow@wilmerhale.com; sonal.mehta@wilmerhale.com; louis.tompros@wilmerhale.com; ari.holtzblatt@wilmerhale.com; robin.burrell@wilmerhale.com; alex.miller@wilmerhale.com; whanthropic-RoundillService@wilmerhale.com
Cc: Richard Busch <Richard.Busch@arlaw.com>; Drew Davis <Drew.Davis@arlaw.com>; David Niemierzycki <David.Niemierzycki@arlaw.com>; jeff <jeff@skaggsfaucette.com>; marty <marty@skaggsfaucette.com>; Delia Carr

<Delia.Carr@arlaw.com>
Subject: FW: Round Hill Music LP, et al. v. Anthropic PBC, Case No. 3:26-cv-08505-CRB - request for Protective Order

Counsel,

Following up on my colleague' email below, we would like to engage in a Rule 26(f) conference with you. Are you available for such a conference in the later part of next week or during the week of September 28th? Please advise.

Thank you.

Mark Block

From: Drew Davis <Drew.Davis@arlaw.com>
Sent: Tuesday, 15 September 2026 12:47:42
To: Grubow, Jared V. <Jared.Grubow@wilmerhale.com>; Richard Busch <Richard.Busch@arlaw.com>; David Niemierzycki <David.Niemierzycki@arlaw.com>; Delia Carr <Delia.Carr@arlaw.com>; jeff@skaggsfaucette.com <jeff@skaggsfaucette.com>; marty@skaggsfaucette.com <marty@skaggsfaucette.com>; Matt Oppenheim <matt@oandzlaw.com>; Nick Hailey <nick@oandzlaw.com>; Corey Miller <corey@oandzlaw.com>; Michelle Gomez-Reichman <mgomez-reichman@oandzlaw.com>
Cc: Mehta, Sonal <Sonal.Mehta@wilmerhale.com>; Tompros, Louis W. <Louis.Tompros@wilmerhale.com>; Holtzblatt, Ari <Ari.Holtzblatt@wilmerhale.com>; Burrell, Robin C. <Robin.Burrell@wilmerhale.com>; Miller, Alex W. <Alex.Miller@wilmerhale.com>; WH Anthropic-Round Hill Service <WHAnthropic-RoundHillService@wilmerhale.com>
Subject: RE: Round Hill Music LP, et al. v. Anthropic PBC, Case No. 3:26-cv-08505-CRB - request for Protective Order

Counsel,

Per the below request and your response, please provide some dates for our Rule 26(f) conference.

DREW DAVIS
Counsel

E: Drew.Davis@arlaw.com
O: 615.258.9965
Adams & Reese, LLP
1600 West End Avenue, Suite 1400
Nashville, TN 37203

ADAMS &REESE
adamsandreese.com

From: Grubow, Jared V. <Jared.Grubow@wilmerhale.com>
Sent: Tuesday, September 8, 2026 1:09 PM
To: Richard Busch <Richard.Busch@arlaw.com>; David Niemierzycki <David.Niemierzycki@arlaw.com>; Delia Carr <Delia.Carr@arlaw.com>; Drew Davis <Drew.Davis@arlaw.com>; jeff@skaggsfaucette.com; marty@skaggsfaucette.com; Matt Oppenheim <matt@oandzlaw.com>; Nick Hailey <nick@oandzlaw.com>; Corey Miller <corey@oandzlaw.com>; Michelle Gomez-Reichman <mgomez-reichman@oandzlaw.com>

Cc: Mehta, Sonal <Sonal.Mehta@wilmerhale.com>; Tompros, Louis W. <Louis.Tompros@wilmerhale.com>; Holtzblatt, Ari <Ari.Holtzblatt@wilmerhale.com>; Burrell, Robin C. <Robin.Burrell@wilmerhale.com>; Miller, Alex W. <Alex.Miller@wilmerhale.com>; WH Anthropic-Round Hill Service <WHAnthropic-RoundHillService@wilmerhale.com>
Subject: RE: Round Hill Music LP, et al. v. Anthropic PBC, Case No. 3:26-cv-08505-CRB - request for Protective Order

Richard,

We hope you all had a nice holiday weekend as well. We are happy to have a discussion regarding the protective order when the parties confer in advance of the JCMS due December 2.

Jared

From: Richard Busch <Richard.Busch@arlaw.com>
Sent: Tuesday, September 8, 2026 2:03 PM
To: Grubow, Jared V. <Jared.Grubow@wilmerhale.com>; David Niemierzycki <David.Niemierzycki@arlaw.com>; Delia Carr <Delia.Carr@arlaw.com>; Drew Davis <Drew.Davis@arlaw.com>; jeff@skaggsfaucette.com; marty@skaggsfaucette.com; Matt Oppenheim <matt@oandzlaw.com>; Nick Hailey <nick@oandzlaw.com>; Corey Miller <corey@oandzlaw.com>; Michelle Gomez-Reichman <mgomez-reichman@oandzlaw.com>
Cc: Mehta, Sonal <Sonal.Mehta@wilmerhale.com>; Tompros, Louis W. <Louis.Tompros@wilmerhale.com>; Holtzblatt, Ari <Ari.Holtzblatt@wilmerhale.com>; Burrell, Robin C. <Robin.Burrell@wilmerhale.com>; Miller, Alex W. <Alex.Miller@wilmerhale.com>; WH Anthropic-Round Hill Service <WHAnthropic-RoundHillService@wilmerhale.com>
Subject: Re: Round Hill Music LP, et al. v. Anthropic PBC, Case No. 3:26-cv-08505-CRB - request for Protective Order

EXTERNAL SENDER

Hi Jared: hope you had a nice holiday weekend. Following up on the below.

Thanks,

Richard

Get Outlook for iOS

RICHARD BUSCH
Counsel

E: Richard.Busch@arlaw.com
O: 615.257.5864
Adams & Reese, LLP
1600 West End Avenue, Suite 1400
Nashville, TN 37203

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From: Richard Busch <Richard.Busch@arlaw.com>
Sent: Thursday, September 3, 2026 7:25 PM
To: Grubow, Jared V. <Jared.Grubow@wilmerhale.com>; David Niemierzycki <David.Niemierzycki@arlaw.com>; Delia Carr <Delia.Carr@arlaw.com>; Drew Davis <Drew.Davis@arlaw.com>; jeff@skaggsfaucette.com <jeff@skaggsfaucette.com>; marty@skaggsfaucette.com <marty@skaggsfaucette.com>; Matt Oppenheim <matt@oandzlaw.com>; Nick Hailey <nick@oandzlaw.com>; Corey Miller <corey@oandzlaw.com>; Michelle Gomez-Reichman <mgomez-reichman@oandzlaw.com>
Cc: Mehta, Sonal <Sonal.Mehta@wilmerhale.com>; Tompros, Louis W. <Louis.Tompros@wilmerhale.com>; Holtzblatt, Ari <Ari.Holtzblatt@wilmerhale.com>; Burrell, Robin C. <Robin.Burrell@wilmerhale.com>; Miller, Alex W. <Alex.Miller@wilmerhale.com>; WH Anthropic-Round Hill Service <WHAnthropic-RoundHillService@wilmerhale.com>
Subject: Re: Round Hill Music LP, et al. v. Anthropic PBC, Case No. 3:26-cv-08505-CRB - request for Protective Order

Jared:

Now that we are officially part of the party, with the Court granting your motion to relate our case to the Concord/BMG cases, I am writing to request that we enter into a Stipulation joining us to the Protective Order in those cases. By doing so, this will be mutually beneficial, as we will have access to what has previously transpired and can hopefully avoid the cost and expense of relitigating past disputes among other things. We have conferred with Matt Oppenheim and his team, who I have added to copy, and they have consented to this proposal. Please advise if you are amenable to this suggestion.

Thank you,

Richard

Get Outlook for iOS

From: Grubow, Jared V. <Jared.Grubow@wilmerhale.com>
Sent: Tuesday, August 25, 2026 9:41 AM
To: David Niemierzycki <David.Niemierzycki@arlaw.com>; Delia Carr <Delia.Carr@arlaw.com>; Drew Davis <Drew.Davis@arlaw.com>; Richard Busch <Richard.Busch@arlaw.com>; jeff@skaggsfaucette.com <jeff@skaggsfaucette.com>; marty@skaggsfaucette.com <marty@skaggsfaucette.com>
Cc: Mehta, Sonal <Sonal.Mehta@wilmerhale.com>; Tompros, Louis W. <Louis.Tompros@wilmerhale.com>; Holtzblatt, Ari <Ari.Holtzblatt@wilmerhale.com>; Burrell, Robin C. <Robin.Burrell@wilmerhale.com>; Miller, Alex W. <Alex.Miller@wilmerhale.com>; WH Anthropic-Round Hill Service <WHAnthropic-RoundHillService@wilmerhale.com>
Subject: RE: Round Hill Music LP, et al. v. Anthropic PBC, Case No. 3:26-cv-08505-CRB

Counsel,

Attached is the executed waiver of service dated today, as discussed.

Drew Davis

From: Grubow, Jared V. <Jared.Grubow@wilmerhale.com>
Sent: Tuesday, September 22, 2026 9:09 PM
To: Drew Davis; Mark Block; Mehta, Sonal; Tompros, Louis W.; Holtzblatt, Ari; Burrell, Robin C.; Miller, Alex W.; whanthropic-RoundillService@wilmerhale.com
Cc: Richard Busch; David Niemierzycki; jeff; marty; Delia Carr
Subject: Re: Round Hill Music LP, et al. v. Anthropic PBC, Case No. 3:26-cv-08505-CRB - request for Protective Order

Drew,

As I mentioned in my email response to you yesterday, we have been working on a case management statement in the related cases that is due September 30. We're happy to discuss timing of the Rule 26(f) conference after the filing of that statement, which may better inform the substance of that call. Given the Court's decision to set the initial CMC for December 16, that should give the parties plenty of time.

Jared

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jared.grubow@wilmerhale.com

From: Drew Davis <Drew.Davis@arlaw.com>
Sent: Tuesday, 22 September 2026 21:39:53
To: Mark Block <Mark.Block@arlaw.com>; Grubow, Jared V. <Jared.Grubow@wilmerhale.com>; Mehta, Sonal <Sonal.Mehta@wilmerhale.com>; Tompros, Louis W. <Louis.Tompros@wilmerhale.com>; Holtzblatt, Ari <Ari.Holtzblatt@wilmerhale.com>; Burrell, Robin C. <Robin.Burrell@wilmerhale.com>; Miller, Alex W. <Alex.Miller@wilmerhale.com>; whanthropic-RoundillService@wilmerhale.com <whanthropic-RoundillService@wilmerhale.com>
Cc: Richard Busch <Richard.Busch@arlaw.com>; David Niemierzycki <David.Niemierzycki@arlaw.com>; jeff <jeff@skaggsfaucette.com>; marty <marty@skaggsfaucette.com>; Delia Carr <Delia.Carr@arlaw.com>
Subject: Re: Round Hill Music LP, et al. v. Anthropic PBC, Case No. 3:26-cv-08505-CRB - request for Protective Order

EXTERNAL SENDER

Following up again now that the holiday is over. Hoping all that observed had an easy fast.

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From: Drew Davis
Sent: Monday, 21 September 2026 12:22:32
To: Mark Block <Mark.Block@arlaw.com>; jared.grubow@wilmerhale.com <jared.grubow@wilmerhale.com>; sonal.mehta@wilmerhale.com <sonal.mehta@wilmerhale.com>; louis.tompros@wilmerhale.com <louis.tompros@wilmerhale.com>; ari.holtzblatt@wilmerhale.com <ari.holtzblatt@wilmerhale.com>;

robin.burrell@wilmerhale.com <robin.burrell@wilmerhale.com>; alex.miller@wilmerhale.com <alex.miller@wilmerhale.com>; whanthropic-RoundillService@wilmerhale.com <whanthropic-RoundillService@wilmerhale.com>
Cc: Richard Busch <Richard.Busch@arlaw.com>; David Niemierzycki <David.Niemierzycki@arlaw.com>; jeff <jeff@skaggsfaucette.com>; marty <marty@skaggsfaucette.com>; Delia Carr <Delia.Carr@arlaw.com>
Subject: RE: Round Hill Music LP, et al. v. Anthropic PBC, Case No. 3:26-cv-08505-CRB - request for Protective Order

Counsel,

Respectfully following up again. I understand there are many moving pieces, and we are all quite busy, but it has been several days since we have asked for some potential dates for the 26(f) conference.

From: Mark Block <Mark.Block@arlaw.com>
Sent: Friday, September 18, 2026 12:14 PM
To: jared.grubow@wilmerhale.com; sonal.mehta@wilmerhale.com; louis.tompros@wilmerhale.com; ari.holtzblatt@wilmerhale.com; robin.burrell@wilmerhale.com; alex.miller@wilmerhale.com; whanthropic-RoundillService@wilmerhale.com
Cc: Richard Busch <Richard.Busch@arlaw.com>; Drew Davis <Drew.Davis@arlaw.com>; David Niemierzycki <David.Niemierzycki@arlaw.com>; jeff <jeff@skaggsfaucette.com>; marty <marty@skaggsfaucette.com>; Delia Carr <Delia.Carr@arlaw.com>
Subject: FW: Round Hill Music LP, et al. v. Anthropic PBC, Case No. 3:26-cv-08505-CRB - request for Protective Order

Counsel,

Following up on my colleague' email below, we would like to engage in a Rule 26(f) conference with you. Are you available for such a conference in the later part of next week or during the week of September 28th? Please advise.

Thank you.

Mark Block

From: Drew Davis <Drew.Davis@arlaw.com>
Sent: Tuesday, 15 September 2026 12:47:42
To: Grubow, Jared V. <Jared.Grubow@wilmerhale.com>; Richard Busch <Richard.Busch@arlaw.com>; David Niemierzycki <David.Niemierzycki@arlaw.com>; Delia Carr <Delia.Carr@arlaw.com>; jeff@skaggsfaucette.com <jeff@skaggsfaucette.com>; marty@skaggsfaucette.com <marty@skaggsfaucette.com>; Matt Oppenheim <matt@oandzlaw.com>; Nick Hailey <nick@oandzlaw.com>; Corey Miller <corey@oandzlaw.com>; Michelle Gomez-Reichman <mgomez-reichman@oandzlaw.com>
Cc: Mehta, Sonal <Sonal.Mehta@wilmerhale.com>; Tompros, Louis W. <Louis.Tompros@wilmerhale.com>; Holtzblatt, Ari <Ari.Holtzblatt@wilmerhale.com>; Burrell, Robin C. <Robin.Burrell@wilmerhale.com>; Miller, Alex W. <Alex.Miller@wilmerhale.com>; WH Anthropic-Round Hill Service <WHAnthropic-RoundHillService@wilmerhale.com>
Subject: RE: Round Hill Music LP, et al. v. Anthropic PBC, Case No. 3:26-cv-08505-CRB - request for Protective Order

Counsel,

Per the below request and your response, please provide some dates for our Rule 26(f) conference.

DREW DAVIS
Counsel

E: Drew.Davis@arlaw.com
O: 615.258.9965
Adams & Reese, LLP
1600 West End Avenue, Suite 1400
Nashville, TN 37203

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From: Grubow, Jared V. <Jared.Grubow@wilmerhale.com>
Sent: Tuesday, September 8, 2026 1:09 PM
To: Richard Busch <Richard.Busch@arlaw.com>; David Niemierzycki <David.Niemierzycki@arlaw.com>; Delia Carr <Delia.Carr@arlaw.com>; Drew Davis <Drew.Davis@arlaw.com>; jeff@skaggsfaucette.com; marty@skaggsfaucette.com; Matt Oppenheim <matt@oandzlaw.com>; Nick Hailey <nick@oandzlaw.com>; Corey Miller <corey@oandzlaw.com>; Michelle Gomez-Reichman <mgomez-reichman@oandzlaw.com>
Cc: Mehta, Sonal <Sonal.Mehta@wilmerhale.com>; Tompros, Louis W. <Louis.Tompros@wilmerhale.com>; Holtzblatt, Ari <Ari.Holtzblatt@wilmerhale.com>; Burrell, Robin C. <Robin.Burrell@wilmerhale.com>; Miller, Alex W. <Alex.Miller@wilmerhale.com>; WH Anthropic-Round Hill Service <WHAnthropic-RoundHillService@wilmerhale.com>
Subject: RE: Round Hill Music LP, et al. v. Anthropic PBC, Case No. 3:26-cv-08505-CRB - request for Protective Order

Richard,

We hope you all had a nice holiday weekend as well. We are happy to have a discussion regarding the protective order when the parties confer in advance of the JCMS due December 2.

Jared

From: Richard Busch <Richard.Busch@arlaw.com>
Sent: Tuesday, September 8, 2026 2:03 PM
To: Grubow, Jared V. <Jared.Grubow@wilmerhale.com>; David Niemierzycki <David.Niemierzycki@arlaw.com>; Delia Carr <Delia.Carr@arlaw.com>; Drew Davis <Drew.Davis@arlaw.com>; jeff@skaggsfaucette.com; marty@skaggsfaucette.com; Matt Oppenheim <matt@oandzlaw.com>; Nick Hailey <nick@oandzlaw.com>; Corey Miller <corey@oandzlaw.com>; Michelle Gomez-Reichman <mgomez-reichman@oandzlaw.com>
Cc: Mehta, Sonal <Sonal.Mehta@wilmerhale.com>; Tompros, Louis W. <Louis.Tompros@wilmerhale.com>; Holtzblatt, Ari <Ari.Holtzblatt@wilmerhale.com>; Burrell, Robin C. <Robin.Burrell@wilmerhale.com>; Miller, Alex W. <Alex.Miller@wilmerhale.com>; WH Anthropic-Round Hill Service <WHAnthropic-RoundHillService@wilmerhale.com>
Subject: Re: Round Hill Music LP, et al. v. Anthropic PBC, Case No. 3:26-cv-08505-CRB - request for Protective Order

EXTERNAL SENDER

Hi Jared: hope you had a nice holiday weekend. Following up on the below.

Thanks,

Richard

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RICHARD BUSCH
Counsel

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Adams & Reese, LLP
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Nashville, TN 37203

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From: Richard Busch <Richard.Busch@arlaw.com>
Sent: Thursday, September 3, 2026 7:25 PM
To: Grubow, Jared V. <Jared.Grubow@wilmerhale.com>; David Niemierzycki <David.Niemierzycki@arlaw.com>; Delia Carr <Delia.Carr@arlaw.com>; Drew Davis <Drew.Davis@arlaw.com>; jeff@skaggsfaucette.com <jeff@skaggsfaucette.com>; marty@skaggsfaucette.com <marty@skaggsfaucette.com>; Matt Oppenheim <matt@oandzlaw.com>; Nick Hailey <nick@oandzlaw.com>; Corey Miller <corey@oandzlaw.com>; Michelle Gomez-Reichman <mgomez-reichman@oandzlaw.com>
Cc: Mehta, Sonal <Sonal.Mehta@wilmerhale.com>; Tompros, Louis W. <Louis.Tompros@wilmerhale.com>; Holtzblatt, Ari <Ari.Holtzblatt@wilmerhale.com>; Burrell, Robin C. <Robin.Burrell@wilmerhale.com>; Miller, Alex W. <Alex.Miller@wilmerhale.com>; WH Anthropic-Round Hill Service <WHAnthropic-RoundHillService@wilmerhale.com>
Subject: Re: Round Hill Music LP, et al. v. Anthropic PBC, Case No. 3:26-cv-08505-CRB - request for Protective Order

Jared:

Now that we are officially part of the party, with the Court granting your motion to relate our case to the Concord/BMG cases, I am writing to request that we enter into a Stipulation joining us to the Protective Order in those cases. By doing so, this will be mutually beneficial, as we will have access to what has previously transpired and can hopefully avoid the cost and expense of relitigating past disputes among other things. We have conferred with Matt Oppenheim and his team, who I have added to copy, and they have consented to this proposal. Please advise if you are amenable to this suggestion.

Thank you,

Richard