

1 Justin A. Nelson (*pro hac vice*)
Alejandra C. Salinas (*pro hac vice*)
2 **SUSMAN GODFREY L.L.P.**
1000 Louisiana Street, Suite 5100
3 Houston, TX 77002-5096
Telephone: (713) 651-9366

4 Rohit D. Nath (SBN 316062)
5 Michael Adamson (SBN 321754)
SUSMAN GODFREY L.L.P.
6 1900 Avenue of the Stars, Suite 1400
Los Angeles, CA 90067-2906
7 Telephone: (310) 789-3100

8 Rachel Geman (*pro hac vice*)
Jacob S. Miller (*pro hac vice*)
9 Danna Z. Elmasry (*pro hac vice*)
LIEFF CABRASER HEIMANN &
10 **BERNSTEIN, LLP**
250 Hudson Street, 8th Floor
11 New York, NY 10013-1413
Telephone: (212) 355-9500

12 Elizabeth J. Cabraser (SBN 083151)
13 Daniel M. Hutchinson (SBN 239458)
Jallé Dafa (SBN 290637)
14 Amelia Haselkorn (SBN 339633)
LIEFF CABRASER HEIMANN &
15 **BERNSTEIN, LLP**
275 Battery Street, 29th Floor
16 San Francisco, CA 94111-3339
Telephone: (415) 956-1000

17 *Co-Lead Class Counsel*

18 [Additional counsel listed in the signature block.]
19

20 **UNITED STATES DISTRICT COURT**
21 **NORTHERN DISTRICT OF CALIFORNIA**
SAN FRANCISCO DIVISION

22 ANDREA BARTZ, ANDREA BARTZ, INC.,)
CHARLES GRAEBER, KIRK WALLACE)
23 JOHNSON, and MJ + KJ, INC., individually)
and on behalf of others similarly situated,)

24 Plaintiffs,)

25 v.)

26 ANTHROPIC PBC,)

27 Defendant.)
28

Douglas A. Winthrop (Bar No. 183532)
Joseph Farris (Bar No. 263405)
Pieter de Ganon (Bar No. 320385)
Jessica L. Gillotte (Bar No. 333517)
Estayvaine Bragg (Bar No. 341400)
ARNOLD & PORTER KAYE SCHOLER LLP
Three Embarcadero Center 10th Floor
San Francisco, CA 94111-4024
(415) 471-3100
(415) 471-3400 (fax)
douglas.winthrop@aporter.com
joseph.farris@arnoldporter.com
pieter.deganon@arnoldporter.com
estayvaine.bragg@arnoldporter.com
jessica.gillotte@arnoldporter.com
estayvaine.bragg@arnoldporter.com

Daralyn J. Durie (Bar No. 169825)
Ramsey Fisher (Bar No.334228)
Jackson Lane (Bar No. 351633)
MORRISON & FOERSTER LLP
425 Market Street
San Francisco, CA 94105
(415) 268-7000
(415) 268-7522 (fax)
DDurie@mofo.com
RamseyFisher@mofo.com
jlane@mofo.com

Attorneys for Defendant Anthropic PBC

Case No.: 3:24-cv-05417-AMO

JOINT CASE MANAGEMENT STATEMENT

1 Pursuant to the Court’s Order dated January 12, 2026 (Dkt. No. 537) and Civil Local Rule 16-9, the
2 Parties in the above-captioned action submit this Joint Case Management Statement.

3 **I. PROCEDURAL HISTORY**

4 In accordance with the “Northern District of California’s Standing Order for All Judges - Contents
5 of Joint Case Management Statement,” the Parties set forth below a concise overview of the litigation.
6 Plaintiffs are rightsholders—legal and beneficial owners of books with a registered copyright—who allege
7 that Defendant Anthropic PBC (“Anthropic”) infringed their copyrights by downloading datasets containing
8 copyrighted books in violation of the federal Copyright Act. *See, e.g.*, 17 U.S.C. § 106. Anthropic is an
9 artificial intelligence company that disputes infringement and asserts that any use of Plaintiffs’ works was
10 for the purpose of training Large Language Models (LLMs) and was lawful, including under the fair use
11 doctrine. *See* 17 U.S.C. § 107.

12 After hard-fought litigation on an expedited schedule, the Parties announced a settlement on
13 August 26, 2025, as fact discovery was about to close and roughly three months before the scheduled trial
14 date of December 1, 2025. To Plaintiffs’ understanding, the settlement fund of \$1.5 billion—representing a
15 little over \$3,000 per work for the 482,460 Class Works¹—would be the largest known copyright recovery
16 in history. On September 25, 2005, Judge Alsup preliminarily approved a settlement of the case by oral
17 order at the hearing on preliminary approval. Dkt. 431 at 17–18. He subsequently issued a written order
18 explaining in more detail the reasons for preliminary approval. *See generally* Dkt. 437. The parties
19 submitted a detailed plan of allocation and distribution. *See* Dkt. 401-1. Direct notice went out on
20 December 1, 2025. The opt-out and objection deadline, originally set for January 15, 2026, has been
21 extended to January 29, 2026. The claims deadline is March 30, 2026. Judge Alsup set a final approval
22 hearing for April 23, 2026, which is now off calendar, but Plaintiffs have requested that the Court re-set the
23 final approval hearing for the same date. *See* Dkt. 533. The Parties address the Settlement and its
24 implementation in more detail in the following sections.

25 Plaintiffs initially filed this action on August 19, 2024, alleging that Anthropic downloaded
26

27 ¹ The final per-work payment is not yet known. The settlement fund is accruing interest to the benefit of the
28 Class, the total number of claimants is yet to be determined (although there is no reversion), and settlement
administration and other court-authorized expenses, as well as attorneys’ fees and service awards to the
extent granted, will be paid from the fund.

1 Plaintiffs' copyrighted works from pirated datasets without authorization and used those works to train its
2 Claude LLMs. Dkt. 1. Service was effected and Anthropic executed a waiver of service on September 4,
3 2024.² Dkt. 12. On December 4, 2024, Plaintiffs filed the Amended Class Action Complaint, to, among
4 other things, add the Plaintiffs' loan-out companies as named Plaintiffs. Dkt. 70. Anthropic answered the
5 Amended Complaint on December 18, 2024, denying liability and asserting affirmative defenses, including
6 fair use and innocent infringement. Dkt. 72. On October 10, 2024, the Court entered a case management
7 order pursuant to which class-certification briefing would begin on March 6, 2025, with fact discovery
8 closing on August 29, 2025, and a jury trial set for December 1, 2025. Dkt. 49. The Court has subject-matter
9 jurisdiction under 28 U.S.C. § 1331 because the action arises under the Copyright Act. Venue and personal
10 jurisdiction are proper in this District because Anthropic resides or may be found here and a substantial part
11 of the events giving rise to the claims occurred here.³

12 Discovery in the matter began immediately. The parties exchanged initial disclosures and conferred
13 regarding the Northern District's ESI Guidelines and evidence preservation consistent with Rule 26(f).
14 Counsel reviewed and adhered to the Northern District's Guidelines for Professional Conduct and the
15 Court's standing and supplemental orders governing practice, discovery, and pretrial matters.

16 The Parties' efforts in discovery were extensive. Plaintiffs served 186 requests for production, 29
17 interrogatories, and 65 requests for admission. In turn, Anthropic served 263 RFPs (approximately 87
18 directed to each named author), 75 interrogatories (25 per author), and 395 RFAs (47 for Graeber, 230 for
19 Bartz, and 118 for Johnson). The Parties negotiated and the Court entered three stipulated discovery
20 protocols: a Protective Order, an ESI and Hard-Copy Document Protocol, and a Protocol for Inspection of
21 Training Data and Source Code. *See* Dkts. 63, 74, 85. Anthropic produced more than 80,000 documents.
22 Plaintiffs produced more than 20,000 pages of manuscript drafts, publishing contracts, registration
23 certificates, and sales statements in response to Anthropic's RFPs. By the time of settlement, the Parties had
24

25 ² Plaintiffs filed a Certificate of Interested Entities pursuant to Local Rule 3-15, on September 5, 2024. Dkt.
26 13. Anthropic filed a Certificate of Interested Entities on October 15, 2025 (Dkt. 51), as well as
supplemental Certificates of Interested Entities on May 30, 2025 (Dkt. 218) and June 2, 2025 (Dkt. 219).

27 ³ Neither party has designated this case as related to any other pending action in this District. Plaintiffs note
28 that Judge Eumi Lee previously declined Plaintiffs' motion to relate this case to another copyright action
pending against Anthropic. *See Concord Music Group, Inc. v. Anthropic PBC*, 24-cv-03811, Dkt. 215
(Motion); Dkt. 239 (Order Denying Motion).

1 conducted 20 depositions.⁴

2 The principal legal issues included whether Anthropic’s alleged reproduction of Plaintiffs’
3 copyrighted works constituted fair use. The issues were actively litigated in class certification and at
4 summary judgment. On June 23, 2025, the Court held that using books to train LLMs and converting
5 purchased print books to digital format were fair uses and granted Anthropic summary judgment on those
6 uses, but denied summary judgment regarding Anthropic’s downloading of pirated books from two sources
7 (Library Genesis (“LibGen”) and Pirate Library Mirror (“PiLiMi”)) for the alleged use of building a central
8 library. On July 17, 2025, the Court certified a class of rightsholders in books allegedly downloaded by
9 Anthropic from these sources. While Plaintiffs’ original class definition included “natural persons, estates,
10 literary trusts, and loan-out companies,” *see* Dkt. 125 at 7, the Court’s certification order added publishers to
11 the certified class. The Class definition is:

12 All beneficial or legal copyright owners of the exclusive right to reproduce
13 copies of any book in the versions of LibGen or PiLiMi downloaded by
14 Anthropic. “Book” refers to any work possessing an ISBN or ASIN which
15 was registered with the United States Copyright Office within five years of the
16 work’s publication and which was registered with the United States Copyright
Office before being downloaded by Anthropic, or within three months of
publication. Excluded are the directors, officers and employees of Anthropic,
personnel of federal agencies, and district court personnel.

17 Dkt. 244 at 31.

18 To represent the interests of publishers added to the class at certification, Class Counsel invited and
19 associated with Publishers’ Coordination Counsel (“PCC”), Edelson PC and Oppenheim + Zebtrak, LLP.
20 Dkt. 298.⁵ Class Counsel filed a notice of association on the docket, noting the PCC’s support by the
21 Association of American Publishers (“AAP”)—the largest trade association representing U.S. publishers—
22 and its members. *Id.* The Court approved the PCC’s motion for *pro hac vice* appearance, allowing them into
23 the case. *See* Dkts. 306–09. Cowan, DeBaets, Abrahams & Sheppard LLP (“CDAS”), the firm that later
24 acted as Authors’ Coordination Counsel (“ACC”), had been Plaintiffs’ counsel since the beginning of the
25

26 ⁴ The procedural history of the case is set out in greater detail in the initial brief that Plaintiffs submitted in
support of preliminary approval. *See* Dkt. 363 at 9–16.

27 ⁵ Anthropic does not sign onto any portion of the CMC statement that characterizes the ACC or PCC firms.
28 Anthropic lacks sufficient information to state exactly what the role of the PCC and ACC were in the
matters described above, as, with the exception of limited interaction with them during settlement talks, it
has had virtually no interaction with the PCC or ACC.

1 case. Dkt. 522 at ¶¶ 3, 8–9.

2 Following the summary judgment and class certification orders, the Parties engaged in extensive
3 appellate briefing before the Ninth Circuit, as well as briefing in the District Court. *See, e.g.*, Dkt. 241
4 (motion for leave to appeal under 28 U.S.C. § 1292(b) or, in the alternative, for reconsideration of the
5 Court’s summary judgment order);⁶ Dkt. 272 (Anthropic’s motion to stay). At the same time, the Parties
6 were completing fact and expert discovery and preparing for the December 1, 2025 trial. A key issue at this
7 time was the identification of the books allegedly infringed. The PCC, at the request of Class Counsel,
8 worked with publisher Class Members to assist in assembling the Works List, as well as identifying and
9 preparing two third-party witnesses for trial. Dkt. 401 at 7–8. The ACC assisted as well, in particular in
10 connection with older works. Dkt. 522 at ¶ 9.

11 **II. SETTLEMENT**

12 **A. Terms and Preliminary Approval**

13 Consistent with the order governing putative class actions in this case, Dkt. 8, the Parties did not
14 address settlement until the Court authorized the parties to do so. Dkt. 210. Settlement negotiations were
15 hard-fought and spanned several months, beginning in May 2025. *See* Dkt. 363 at 25–26 (overviewing
16 negotiation history of settlement). In August, the parties changed mediators and held an in-person mediation
17 on August 19, 2025.⁷ On August 25, 2025, shortly before midnight, the Parties executed a binding term
18 sheet. *See* Dkt. 363-3 (Settlement Agreement).

19 At the mediation, and afterward, the PCC engaged collaboratively with Class Counsel to help secure
20 the Settlement given, *inter alia*, their experience in negotiating large settlements and the publishers’
21 bargaining power. *See* Dkts. 398, 527, 528 (describing PCC role in the settlement); *see also* Dkt. 522 at 8
22 (describing role of Authors’ Coordination Counsel in the Settlement).

23 The preliminarily certified class settlement establishes a non-reversionary fund of \$1.5 billion plus
24 interest. The Settlement is to be distributed on a uniform per-work basis to Class Members who submit
25 approved claims. *See, e.g.*, Dkt. 401-1 (Plan of Allocation and Distribution). The Settlement Agreement also
26 requires Anthropic to (a) destroy all the original files of works torrented/downloaded from LibGen or
27

28 ⁶ Anthropic argued in its motion for reconsideration that, *inter alia*, there was no “central library”.

1 PiLiMi, and any copies that originate from the torrented copies, subject to any preservation obligations for
2 litigation or other court orders; and (b) represent that neither the LibGen or PiLiMi datasets, nor any
3 portions of those datasets, were in the training corpus of any of its commercially released large language
4 models. *See* Dkt. 363-3 at 13 (“Dataset Destruction Obligations”); *id.* at 13–14 (Anthropic’s non-use-in-
5 training certification). In exchange, Anthropic receives a release for past claims to August 25, 2025. No
6 claim arising after August 25, 2025 is released. In addition, claims arising out of allegedly infringing
7 outputs from Anthropic’s AI models—whether past or future—are not released. *See* Dkt. 363-3 at 7
8 (“Released Claims”).

9 The Settlement stages payments in four increments: \$300 million shortly after preliminary approval;
10 \$300 million shortly after final approval; and two payments of \$450 million, each to occur the earlier of (a)
11 September 25, 2026 (for the first) and September 25, 2027 (for the second) or (b) on a faster timeline if
12 Anthropic either conducts a qualifying private capital raise or has a qualifying initial public offering. *See*
13 Dkt. 363-3 at 9-10; *see also id.* at Section 1.27 (“Qualified Financing”) & Section 1.21 (“Liquidity Event”).
14 Interest accrues on the two \$450 million payments. The first \$300 million payment has already occurred and
15 is in trust.

16 Plaintiffs filed an Unopposed Motion for Preliminary Approval on September 5, 2025, accompanied
17 by six declarations and several exhibits. Dkt. 363. The Parties appeared at a hearing on September 8, 2025.
18 The Court thereafter issued an order stating that “[p]reliminary approval was postponed pending submission
19 of further clarifying information,” including Plaintiffs’ submission of a plan of allocation and distribution.
20 Dkt. 371. After the hearing, the Court posed 34 questions to the Parties regarding the settlement. *See* Dkts.
21 375, 383. Those questions were answered in a 50-page submission on September 23, 2025, Dkt. 418, which
22 was preceded on September 22 by Plaintiffs’ submission of a 34-page supplemental brief in support of
23 preliminary approval, Dkt. 401, accompanied by a detailed Plan of Allocation, Dkt. 401-1, and 16 additional
24 declarations, Dkts. 385–400. The Court held another hearing on September 25, 2025, at which it
25 preliminarily approved the settlement, asked Plaintiffs’ counsel to explain the reasons why the settlement
26 was in the best interests of the class, and comprehensively detailed the reasons that the Settlement was in the
27 best interests of the Class. Dkt. 431 at 16–17. The Court then issued a written order confirming preliminary
28 approval of the Settlement. *See* Dkt. 437.

1 The Court also approved the proposed plan of allocation and distribution plan that undergirds the
2 claims process. *Id.* The majority of works on the Works List will have both a legal and beneficial owner
3 (often the publisher will be the “legal owner” while the author who has assigned title to the publisher but
4 retained a right to receive royalties will be a “beneficial owner”). For such works, Class Counsel⁸
5 proposed—after consultation with the ACC and PCC—a distribution plan and Claim Form that allow most
6 claimants to choose a non-mandatory default split of 50-50 of settlement proceeds between the publisher(s)
7 and author(s). Dkt. 401-1 § 4(a)(i)). Any claimant, however, can de-select that default by indicating that the
8 claimant has a different contractual arrangement that it seeks to pursue. *Id.* § 4(e). For “education works”⁹—
9 again after consultation with critical stakeholders—Class Counsel determined that contracts for educational
10 works varied too much to suggest a default. Thus, the Claim Form requests that, for educational works, the
11 claimant make a good-faith representation regarding the percentage of recovery that the claimant is entitled
12 to receive for a given work relative to other potential claimants in the work. *Id.* § 4(b). Importantly, under
13 the plan of allocation and distribution, any identified rightsholder to the work (even those who do not file
14 claims) will receive a check for their share of the per-work award. *Id.* § 3(c)(ii)(3). If the rightsholder does
15 not cash the check within 18 months, then the funds will be redistributed to the Filing Claimant for the
16 work. *Id.*

17 The settlement website (<https://www.anthropiccopyrightsettlement.com/>) went live shortly after
18 preliminary approval, commencing the robust notice program. *See* Dkt. 401 at 19–24 (overviewing notice
19 program effecting notice through direct notice by U.S. mail and email, industry group notice, publication
20 notice, social media and digital notice, and online notice); *see also* Dkt. 399 (Keough Decl.) at ¶ 117
21 (estimating the cost to complete the robust notice program at \$15 million). Direct notice was sent by U.S.
22 Mail and email on December 1, 2025. The opt-out and objection date is January 29, 2026, as recently
23 extended by this Court. Dkt. 535. The Claims Deadline is March 30, 2026. *See* Dkt. 401-1 at 6 (overviewing
24 settlement deadlines); Dkt. 496 at 2 (granting 7-day extension for claims deadline).

25
26 ⁸ By order entered on July 17, 2025 (Dkt. 244), the Court appointed Susman Godfrey L.L.P. and Lieff
Cabraser Heimann & Bernstein, LLP as Class Counsel.

27 ⁹ For this purpose, Class Counsel have identified “Education Works” as “works published by education
28 publishers. Education publishers specialize in creating and publishing works, including but not limited to
textbooks, for the instruction of students and professionals, which are distributed for and through
educational and professional markets.” Dkt. 455-2 at 16 (FAQ No. 22).

1 **B. Implementation by Plaintiffs**

2 Plaintiffs provide the following summary of their efforts to ensure the success of the claims process
3 and the Settlement. While the claims process remains ongoing, Plaintiffs’ tireless efforts to date have
4 provided substantial dividends.

5 ***Engagement with the Class.*** Plaintiffs are deeply engaged in the day-to-day administration of this
6 settlement, providing direct, hands-on support to Class Members. Dedicated teams of attorneys and
7 paralegals are fielding hundreds of inquiries each week—by email, telephone, and live Zoom—answering
8 questions, guiding Class Members through eligibility issues, and assisting with preparation and submission
9 of claim forms. Class Counsel also maintains a dedicated phone line and email inboxes that the Settlement
10 Administrator can use to escalate any inquiry that it receives directly; both the phone line and email systems
11 are staffed by multiple attorneys and are available throughout the business day. Class Counsel is tracking
12 the correspondence it receives, and its litigation teams are in constant contact to ensure Class Member
13 inquiries are timely and accurately resolved. For example, Class Counsel have communicated with more
14 than 20,000 Class Members.

15 Class Counsel is also being proactive in administering the settlement, regularly seeking to inform
16 Class Members of their rights. For example, Class Counsel, together with industry organizations, has
17 organized multiple webinars to walk Class Members through the requirements and timeline, clarify
18 documentation needs, and address recurring questions. These webinars have been widely attended—some
19 with more than 1,000 sign-ups—and have featured extensive question-and-answer sessions between Class
20 Members and Class Counsel and follow-up. In addition, for real-time, individualized guidance, Class
21 Counsel is also implementing virtual “office hours” during which Class Members can join a Zoom session,
22 receive immediate assistance, and ask questions about completing and submitting their claim forms. Class
23 Counsel is dedicated to ensuring that Class Members are fully apprised of their rights, and that Class
24 Members receive appropriate assistance in effectively exercising those rights.

25 At the request of Class Counsel, the PCC has further assisted in the notice process and supported
26 Class Members in the settlement implementation. The PCC has held six town halls with publisher trade
27 organizations and their members, attended by approximately 800 publisher representatives from AAP, UK
28 Publishers’ Association, International Publishing Association, Association of University Presses,

1 Independent Publishers Guild, and Publishers' Licensing Services. The PCC further worked with numerous
2 publishers to gather author contact information for the Settlement Administrator to effectuate notice. This
3 effort resulted in publishers providing contact information for more than 750,000 authors or other potential
4 rightsholders associated with nearly 320,000 works in the Settlement. The PCC continues to work with
5 publisher Class Members on a daily basis to implement the settlement.

6 The ACC likewise works with Class Members in answering settlement related questions.

7 **Claims Submission.** Significant numbers of claims have been filed. While the claims filing process
8 is ongoing, as of January 14, 2026, the Settlement Administrator has received a total of 56,798 claims for
9 161,691 works. The present claims rate—nearly 20%—already “vastly exceeds the rate of 4–9% that is
10 typical for consumer class actions.” *In re Facebook Biometric Info. Priv. Litig.*, 522 F. Supp. 3d 617, 622
11 (N.D. Cal. 2021), *aff'd*, 2022 WL 822923 (9th Cir. Mar. 17, 2022). The claims include claims by different
12 kinds of rightsholders (*e.g.*, author and publisher alike), for both Non-Education and Education Books, and
13 from within and outside of the U.S. Class Members have both elected the default and elected not to use the
14 default; have uploaded materials or not. The Settlement is being implemented as planned. Further, the
15 claims process has also helped ensure affected rightsholders are aware of their rights under the settlement,
16 just as the claims process was designed to do. 28,554 claim form submissions have included the information
17 of other rightsholders, helping to ensure that the Settlement Administrator can contact affected Class
18 Members and alert them to their rights. There are presently 86 opt outs accounting for 208 works, and these
19 and the objections will be addressed in final approval briefing. Class Counsel notes that on January 14,
20 2026, a number of earlier-filed letters to the Court were posted. Class Counsel were not aware of these
21 letters prior to docketing, and are reviewing the submissions to respond to Class Members who have
22 questions.

23 While the claims process remains ongoing, the large number of claims submitted so far demonstrates
24 the effectiveness of the claims process that the Parties designed and the Court preliminarily approved.

25 **III. MOTIONS**

26 In accordance with the Standing Order, this Section addresses prior and pending motions, motion
27 status, and anticipated motions.
28

1 **A. Prior Major Motions**

2 In addition to numerous discovery and case management rulings, Judge Alsup issued orders on
3 summary judgment (Dkts. 122, 158, 164, 181, and 231), class certification (Dkts. 125, 172, 201, 202, 203,
4 and 244), preliminary approval (Dkts. 363, 401, 437), and various aspects of the Class Notice process (Dkts.
5 441, 453, 485, 488, 490, 495).

6 Judge Alsup also issued orders both in writing and orally concerning Plaintiffs' motion seeking
7 corrective notice under Federal Rule of Evidence 23(d) to address misleading communications soliciting
8 opt-outs made by a third-party law firm called "ClaimsHero." *See* Dkt. 442 (Motion); Dkts. 448 (Order); *see*
9 *also* Dkt. 484 (transcript of November 12, 2025, hearing on motion); Dkt. 503 (transcript of November 25,
10 2025, evidentiary hearing on motion). As described in the motion and recognized by the Court at both
11 hearings, although ClaimsHero purported to be helping Class Members file a claim in the settlement,
12 signing up for ClaimsHero would actually *opt out* the Class Member from the settlement. As a result of the
13 motion and the Court's order on the issue, ClaimsHero ceased the challenged advertisements and issued
14 corrective disclosures on its website.

15 **B. Future and Anticipated Motions**

16 ***Final Settlement Approval:*** Plaintiffs will file their motion for final approval of the settlement by no
17 later than March 19, 2026,¹⁰ which is 35 days prior to the previously scheduled fairness hearing on April 23,
18 2026, Dkt. 437. Plaintiffs will supplement that filing with an updated claims report by April 16, 2026. If
19 Anthropic files any response to the motion for final approval, it will do so by April 2.

20 ***Attorneys' Fees, Expenses, and Service Awards:*** On December 3, 2025, Plaintiffs' counsel filed
21 their request for fees, costs, and service awards, seeking fees of 20% of the settlement fund, which, among
22 other things, is below the 25% benchmark and reasonable given the results for the class and the lodestar.
23 Dkt. 505. Anthropic objected in part to the fee portion of the request on December 17, 2025, asserting that
24 (i) the request proposed payment of attorneys' fees to various law firms other than Class Counsel, and (ii)
25 the attorneys' fees award should be based on a lodestar calculation as opposed to a percentage, due to the
26 "megafund" nature of the settlement. Dkt. 511. On December 23, Judge Alsup issued a statement regarding
27

28 ¹⁰ Judge Alsup set the filing deadline for April 16, 2026, but Plaintiffs will file early, consistent with the 35-day motions deadline in Local Rule 7.

1 the fee request and directed the submission of declarations from Class Counsel and other law firms. Dkt.
 2 515. Class Counsel and the other law firms filed their declarations on December 30, 2025. *See* Dkts. 521–
 3 528. Plaintiffs will file their reply brief with respect to their request for fees, costs, and service awards on
 4 March 19, 2026.

5 ***Third-Party Class Communications:*** Plaintiffs are in communication with counsel for ClaimsHero
 6 regarding its ongoing advertising and solicitations to Class Members. Plaintiffs will, as and if necessary,
 7 raise any issues about this with the Court by filing an Administrative Motion no later than February 13,
 8 2026.¹¹

9 ***Other Issues:*** Since preliminary settlement approval, a few unanticipated issues have arisen, which
 10 the Parties have proactively brought to the Court’s attention for further guidance. If any further issues arise,
 11 the Parties commit to raising them with the Court via an Administrative Motion promptly.

12 **IV. SCHEDULING**

13 As noted above, prior to the reassignment of this matter, the Court set a final approval hearing for
 14 April 23, 2026 at 12:00 PM, as well as a series of interim settlement-related deadlines. Plaintiffs have
 15 requested, with Anthropic’s consent, that the Court reset the final approval hearing on the same day,
 16 April 23, 2026. *See* Dkt. 533. Because this Court ordered that only hearing and trial dates “are vacated,”
 17 Dkt. 532, the Parties will continue to adhere to the prior ordered dates with respect to settlement
 18 administration. For the Court’s convenience, those interim deadlines are set forth again below:

Event	Date
Opt Out Deadline	January 29, 2026
Objection Deadline	January 29, 2026
Proposed Deadline for any Settlement-Related Administrative Motion	February 13, 2026
Re-Inclusion Deadline	March 9, 2026
Plaintiffs Will File Final Approval Motion and Reply Brief in Support of Attorneys’ Fees, Reimbursement of Expenses, and Plaintiff Service Award	March 19, 2026
Claims Deadline	March 30, 2026

27 _____
 28 ¹¹ Plaintiffs note that, on December 22, 2025, six individuals solicited by ClaimsHero (*see* Dkts. 461–467) filed suit against Anthropic and other companies, alleging violations of the Copyright Act based on the downloading of copyrighted works from online repositories. *See* 25-cv-10897 (N.D. Cal.).

Event	Date
Anthropic’s Deadline to File Any Response In Connection with Plaintiffs’ Motion for Final Approval	April 2, 2026
Plaintiffs Will File Updated Claims Report	April 16, 2026
Proposed Fairness Hearing	April 23, 2026

V. CONCLUSION

The Parties are prepared to answer any questions the Court may have about this matter, including the timing of the final approval hearing, the settlement process, any issues arising out of any past Court Orders, or any other issue the Court may raise.

Dated: January 15, 2026

Respectfully submitted,

By: /s/ Rachel Geman

By: /s/ Douglas A. Winthrop

Rachel Geman (*pro hac vice*)
LIEFF CABRASER HEIMANN & BERNSTEIN, LLP
 250 Hudson Street, 8th Floor
 New York, New York 10013-1413
 Telephone: (212) 355-9500
 rgeman@lchb.com

Douglas A. Winthrop (Bar No. 183532)
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ARNOLD & PORTER KAYE SCHOLER LLP
 Three Embarcadero Center 10th Floor
 San Francisco, CA 94111-4024
 (415) 471-3100
 (415) 471-3400 (fax)
 douglas.winthrop@aporter.com
 joseph.farris@arnoldporter.com
 pieter.deganon@arnoldporter.com
 estayvaine.bragg@arnoldporter.com
 jessica.gillotte@arnoldporter.com
 estayvaine.bragg@arnoldporter.com

Elizabeth J. Cabraser (SBN 083151)
 Daniel M. Hutchinson (SBN 239458)
 Jallé H. Dafa (SBN 290637)
 Amelia Haselkorn (SBN 339633)
LIEFF CABRASER HEIMANN & BERNSTEIN, LLP
 275 Battery Street, 29th Floor
 San Francisco, CA 94111-3339
 Telephone: (415) 956-1000
 ecabraser@lchb.com
 dhutchinson@lchb.com
 jdafa@lchb.com
 ahaselkorn@lchb.com

Assad H. Rajani (Bar No. 251143)
ARNOLD & PORTER KAYE SCHOLER LLP
 3000 El Camino Real
 Five Palo Alto Square, Suite 500
 Palo Alto, CA 94306
 (650) 319.4500
 (650) 319-4700 (fax)
 assad.rajani@arnoldporter.com

Betsy A. Sugar (*pro hac vice*)
LIEFF CABRASER HEIMANN & BERNSTEIN, LLP
 222 2nd Avenue S., Suite 1640
 Nashville, TN 37201
 Telephone: (615) 313-9000
 bsugar@lchb.com

Oscar Ramallo (Bar No. 241487)
 Angel Tang Nakamura (Bar No. 205396)
 Ryan M. Nishimoto (Bar No. 235208)
 Allyson C. Myers (Bar No. 342038)

Co-Lead Counsel

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Justin A. Nelson (*pro hac vice*)
SUSMAN GODFREY L.L.P
1000 Louisiana Street, Suite 5100
Houston, TX 77002-5096
Telephone: (713) 651-9366
jnelson@susmangodfrey.com

Rohit D. Nath (SBN 316062)
Michael Adamson (SBN 321754)
SUSMAN GODFREY L.L.P
1900 Avenue of the Stars, Suite 1400
Los Angeles, CA 90067-2906
Telephone: (310) 789-3100
RNath@susmangodfrey.com
MAdamson@susmangodfrey.com

Alejandra C. Salinas (*pro hac vice*)
SUSMAN GODFREY L.L.P
1000 Louisiana Street, Suite 5100
Houston, TX 77002-5096
Telephone: (713) 651-9366
jnelson@susmangodfrey.com
asalinas@susmangodfrey.com

Co-Lead Counsel

Jordan W. Connors (*pro hac vice*)
SUSMAN GODFREY L.L.P
401 Union Street, Suite 3000
Seattle, WA 98101
Telephone: (206) 516-3880
jconnors@susmangodfrey.com

J. Craig Smyser (*pro hac vice*)
Samir H. Doshi (*pro hac vice*)
SUSMAN GODFREY L.L.P
One Manhattan West, 51st Floor,
New York, NY 10019
Telephone: (212) 336-8330
csmyser@susmangodfrey.com
sdoshi@susmangodfrey.com

Jacob S. Miller (*pro hac vice*)
Danna Z. Elmasry (*pro hac vice*)
**LIEFF CABRASER HEIMANN
& BERNSTEIN, LLP**
250 Hudson Street, 8th Floor
New York, New York 10013-1413
Telephone: (212) 355-9500
jmiller@lchb.com
delmasry@lchb.com

ARNOLD & PORTER LLP
777 South Figueroa Street, 44th Floor
Los Angeles, CA 90017-5844
(213) 243-4000
(213) 243-4199 (fax)
oscar.ramallo@arnoldporter.com
angel.nakamura@arnoldporter.com
ryan.nishimoto@arnoldporter.com
ally.myers@arnoldporter.com

Daralyn J. Durie (Bar No. 169825)
Ramsey Fisher (Bar No.334228)
Jackson Lane (Bar No. 351633)
MORRISON & FOERSTER LLP
425 Market Street
San Francisco, CA 94105
(415) 268-7000
(415) 268-7522 (fax)
DDurie@mofo.com
RamseyFisher@mofo.com
jlane@mofo.com

Whitney Rose O'Byrne (Bar No. 325698)
MORRISON & FOERSTER LLP
707 Wilshire Boulevard, Suite 6000
Los Angeles, CA 90017
(213) 892-5200
(213) 892-5454 (fax)
WObyrne@mofo.com

Mary Prendergast (Bar No. 272737)
Fitz Beckwith Collings (*pro hac vice*)
Aditya Vijay Kamdar (Bar No. 324567)
MORRISON & FOERSTER LLP
2100 L Street, N.W.
Washington, DC 20037
(202) 572-6757
(202) 887-0763 (fax)
MPrendergast@mofo.com
fcollings@mofo.com
AKamdar@mofo.com

Kathleen R. Hartnett
COOLEY LLP
3 Embarcadero Center, 20th Floor
San Francisco, CA 94111-4004
(415) 693-2071
(415) 693-2222 (fax)
khartnett@cooley.com

Alexander J. Kasner (Bar No. 310637)
Ephraim McDowell (*pro hac vice*)
COOLEY LLP
1299 Pennsylvania Avenue, NW, Suite 700
Washington, DC 20004-2400

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Co-Lead Counsel

Scott J. Sholder (*pro hac vice*)
CeCe M. Cole (*pro hac vice*)
**COWAN DEBAETS ABRAHAMS
& SHEPPARD LLP**
60 Broad Street, 30th Floor
New York, New York 10010
Telephone: (212) 974-7474
ssholder@cdas.com
ccole@cdas.com

(202) 776-2266
(202) 842-7899 (fax)
akasner@cooley.com
emcdowell@cooley.com

Mark Alan Lemley (Bar No. 155830)
LEX LUMINA LLP
700 S. Flower St., Suite 1000
Los Angeles, CA 90017
(650) 723-4605
mlemley@lex-lumina.com

Additional Counsel for the Class

Jay Edelson*
EDELSON PC
350 North LaSalle Street, 14th Floor
Chicago, IL 60654
Telephone: (312) 589-6370
jedelson@edelson.com

Attorneys for Defendant Anthropic PBC

Matthew J. Oppenheim*
Jeffrey M. Gould*
OPPENHEIM & ZEBRAK LLP
4530 Wisconsin Ave, NW, 5th Floor
Washington, DC 20016
Telephone: 202.450.3958
matt@oandzlaw.com

Publishers' Coordinating Counsel

ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3), I hereby attest that all signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

Dated: January 15, 2026

/s/ Rachel J. Geman

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing and all documents attached hereto were served January 15, 2026 upon counsel of record via service by ECF.

By: /s/ Rachel Geman

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