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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

CONCORD MUSIC GROUP, INC., ET AL.,

Plaintiffs,

v.

ANTHROPIC PBC,

Defendant.

Case Number: 5:24-cv-03811-EKL-SVK

**JOINT STIPULATION AND
[PROPOSED] ORDER TO EXTEND
INITIAL ADR DEADLINE**

CIV. L. R. 6-1, 6-2, 7-12

Judge Eumi K. Lee

Magistrate Judge Susan van Keulen

Pursuant to Civil Local Rules 6-1, 6-2, and 7-12, Plaintiffs Concord Music Group, Inc.; Capitol CMG, Inc.; Universal Music Corp.; Songs of Universal, Inc.; Universal Music – MGB NA LLC; Polygram Publishing, Inc.; Universal Music – Z Tunes LLC; and ABKCO Music, Inc. and Defendant Anthropic PBC (collectively, the “Parties”), having met and conferred, hereby respectfully submit this joint stipulation and proposed order to extend the initial ADR deadline of June 30, 2025 to August 25, 2025.

In support of this joint stipulation and proposed order, the Parties state as follows:

WHEREAS, on November 7, 2024, the Court issued a Joint Scheduling Order, ECF No. 262, which set various case scheduling deadlines, and on March 10, 2025, per the Parties’ joint stipulation, the Court entered an order modifying certain of those case scheduling deadlines and setting the current case schedule, ECF No. 305;

WHEREAS, under the current schedule, the initial ADR deadline is set for June 30, 2025;

WHEREAS, the Parties have been engaged in good faith negotiations regarding selecting a mutually agreeable private mediator for this initial ADR session, and to identify and schedule a mutually agreeable date for the initial ADR session on which the mediator, each of the parties, and their respective counsel are all available;

1 WHEREAS, the Parties have agreed to a mediator for the initial ADR session and agreed
2 to August 25, 2025 as the date for the initial ADR session (subject to the Court's approval of the
3 Parties' joint stipulation and request to extend the initial ADR deadline herein);

4 WHEREAS, the Parties agree and stipulate that there is good cause to extend the current
5 initial ADR deadline of June 30, 2025 until August 25, 2025, given the time previously needed for
6 the Parties to engage in good faith negotiations regarding a mutually agreeable private mediator;
7 the need to find a mutually agreeable date for the initial ADR session that accommodates the
8 schedules of the selected mediator, each of the parties, and their respective counsel, and the Parties'
9 inability to identify such a date before August 25, 2025, in light of the mediator's schedule, and
10 the parties' and their counsel's other commitments and conflicts; and the time necessary to prepare
11 in advance for the initial ADR session to ensure the mediation is as productive as possible;

12 WHEREAS, the Parties' proposal would not impact the current case schedule;

13 WHEREAS, Civil Local Rule 6-1(b) permits parties to file a stipulation seeking a court
14 order modifying case deadlines;

15 WHEREAS, along with this Joint Stipulation and Proposed Order, counsel for Plaintiffs
16 will file a declaration in compliance with Local Civil Rule 6-2;

17 NOW, THEREFORE, the Parties stipulate, subject to the Court's approval, that the initial
18 ADR deadline of June 30, 2025 is extended until August 25, 2025, as reflected in the following
19 table:
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Event	Current Deadline	Proposed Deadline
Initial ADR Deadline	June 30, 2025	Aug. 25, 2025
Substantial Completion of Remaining Document Productions	July 14, 2025	No change
Close of Fact Discovery (including all written discovery and deposition of all fact witnesses)	Sept. 11, 2025	No change
Identify and Disclose Expert Witnesses and Exchange Expert Reports	Oct. 13, 2025	No change
Opposition Expert Reports	Nov. 6, 2025	No change
Reply Expert Reports	Dec. 5, 2025	No change
Depose All Expert Witnesses	Jan. 26, 2026	No change
Close of Briefing on Dispositive and/or <i>Daubert</i> Motions	Mar. 30, 2026	No change
Hearing on Dispositive and/or <i>Daubert</i> Motions	Apr. 29, 2026	No change
Joint Pre-Trial Statement	July 2, 2026	No change
Pre-Trial Conference	July 15, 2026	No change
Trial Date	Aug. 16, 2026	No change

Dated: June 17, 2025

Respectfully Submitted,

By: /s/ Timothy Chung

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Attorneys for Defendant Anthropic PBC

SIGNATURE ATTESTATION

Pursuant to Local Rule 5-1(i)(3), I hereby attest under penalty of perjury that all other signatories listed, and on whose behalf this filing is submitted, concur in the content and have authorized this filing.

Dated: June 17, 2025

/s/ Timothy Chung
Timothy Chung