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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

ANDREA BARTZ, CHARLES GRAEBER, and
KIRK WALLACE JOHNSON, individually and
on behalf of others similarly situated,

Plaintiffs,

v.

ANTHROPIC PBC,

Defendant.

Case No. 4:24-cv-05417-AMO

**JOINT STIPULATION AND
~~PROPOSED~~ ORDER APPROVING
UPDATES TO THE SETTLEMENT
WEBSITE**

1 The parties to the above-referenced action, through their respective counsel of record,
2 hereby enter into the following stipulation, subject to the Court's approval, to update the
3 Settlement Website as detailed in Exhibits A and B filed herewith.

4 WHEREAS, Class Members rely on the Settlement Website for updates on Settlement
5 status, administration, and distribution.

6 WHEREAS, since the Court granted final approval of the Settlement (Dkt. 680), Class
7 Counsel have received questions from Class Members about what the order means and what
8 comes next.

9 WHEREAS, the Parties agree to update the Settlement Website to ensure that Class
10 members have up-to-date information about the Settlement's current status and next steps,
11 including updated information regarding the timing and method of (a) Settlement payments and
12 (b) resolving any disputes regarding how such payments should be allocated among co-claimants
13 now that the Court has granted final approval.

14 WHEREAS, while the Court previously directed that modifications to Class Notice be
15 submitted by joint motion for approval, *see* Dkt. 453 at 5, and Class Notice already was
16 effectuated, the Parties recognize that the Settlement Website remains a primary tool to
17 communicate with the Class, *see* Dkt. 437 at 8, and accordingly notify the Court that they have
18 stipulated to the following updates that are informative, responsive to recurring questions, and
19 presented in a neutral manner.

20 WHEREAS, the proposed Settlement Website updates are also intended to reduce
21 administration costs by answering questions that would otherwise be directed to the Settlement
22 Administrator, and help Class Members prepare for next steps, including resolving any allocation
23 disputes with fellow rightsholders and receiving Settlement payments.

24 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by the Parties, and
25 subject to approval by the Court:

26 1. The proposed changes to the Home page (Exhibit A) will inform Class Members
27 that (a) the Court granted final approval on July 20, 2026, the Settlement Administrator sent
28 notices to all claimants between September 2–4, 2026; (b) the Parties agree that the Settlement

1 Effective Date occurred assuming that no late-filed appeal is permitted to go forward; and (c) the
2 first round of payments is expected on or before November 15, 2026.

3 2. The proposed changes to the Frequently Asked Questions page (Exhibit B) will
4 explain that many existing FAQs concern deadlines that have passed and revise FAQ 35 to direct
5 Class Members to the Home page for the latest payment and dispute-resolution information.

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8 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

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10 DATED: September 15, 2026.

11 
12 The Honorable Araceli Martínez-Olguín
13 United States District Court Judge
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1 Dated: September 11, 2026

Respectfully submitted,

2 By: /s/ Rachel Geman

By: /s/ Douglas A. Winthrop

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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: September 11, 2026

/s/ Rachel Geman
Rachel Geman