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7  
8 **UNITED STATES DISTRICT COURT**  
9 **NORTHERN DISTRICT OF CALIFORNIA**  
10 **SAN JOSE DIVISION**

11  
12 CONCORD MUSIC GROUP, INC., ET AL.,  
13 Plaintiffs,  
14 v.  
15 ANTHROPIC PBC,  
16 Defendant.

Case No. 5:24-cv-03811-EKL-SVK

**JOINT STIPULATION AND**  
~~**[PROPOSED]**~~ **ORDER TO EXTEND**  
**CASE DEADLINES AND REQUEST**  
**TO EXCEED APPLICABLE PAGE**  
**LIMITS**

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

Judge Eumi K. Lee  
Magistrate Judge Susan van Keulen

**\*\*\*AS MODIFIED\*\*\***

1 Pursuant to Civil Local Rules 6-1, 6-2, and 7-12, Plaintiffs Concord Music Group, Inc.;  
2 Capitol CMG, Inc.; Universal Music Corp.; Songs of Universal, Inc.; Universal Music – MGB NA  
3 LLC; Polygram Publishing, Inc.; Universal Music – Z Tunes LLC; and ABKCO Music, Inc. and  
4 Defendant Anthropic PBC (collectively, the “Parties”), having conferred, hereby respectfully  
5 submit this joint stipulation and proposed order to extend case deadlines and request to exceed  
6 applicable page limits for both Parties as outlined below.

7 On November 1, 2025, the Court granted the Parties stipulation setting the briefing schedule  
8 for dispositive motions on a three-brief schedule. ECF No. 489. Pursuant to this Court’s Standing  
9 Order, following additional fact and expert discovery in the case, the Parties have conferred and  
10 determined that each Party intends to file cross-motions for summary judgment. The Court’s  
11 Standing Order Section IX provides for cross-motions on a four-brief schedule, and requires the  
12 Parties to “submit a stipulation and proposed order setting a briefing schedule for the cross-motions”  
13 prior to the first brief being filed. The Parties therefore put forth this joint stipulation proposing to  
14 modify the existing schedule to accommodate the Standing Order’s preference on cross-motions.  
15 The Parties have proposed modest modifications to subsequent dates, including the trial date, to  
16 allow for the time between subsequent events contemplated by the Court’s Standing Order,  
17 including allowing at least 28 days between the fourth brief and the hearing date and 12 weeks  
18 between the Hearing Date on Summary Judgment and *Daubert* motions and the pretrial conference.  
19 These modifications also account for trial conflicts of Anthropic’s counsel (which Publishers have  
20 agreed to accommodate).<sup>1</sup> The Parties take seriously the Court’s Standing Order providing that  
21 “[t]rial dates will not be continued absent a strong showing of good cause,” and respectfully submit  
22 that the continuance will allow for compliance with this Court’s Standing Order for briefing on cross  
23 motions for summary judgment, a fulsome presentation of issues at summary judgment (which are  
24 expected to involve, inter alia, complex issues relating to application of copyright principles to AI)  
25 and sufficient time for the Parties and the Court to resolve those pre-trial motions and to  
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28 <sup>1</sup> Anthropic’s lead trial counsel has a jury trial set for September 8, 2026 in the First Judicial  
District of New Mexico that is anticipated to run into October.

1 appropriately prepare for trial. In support of this joint stipulation and proposed order, the Parties  
2 state as follows:

3 WHEREAS, on November 7, 2024, the Court issued a Joint Scheduling Order, ECF No.  
4 262, which set various deadlines for discovery;

5 WHEREAS, on March 10, 2025, the Court entered the Joint Stipulation and Order to Extend  
6 Case Deadlines, ECF No. 305, which extended various deadlines for discovery, at the Parties' joint  
7 request;

8 WHEREAS, on August 19, 2025, the Court entered the Amended Case Management &  
9 Scheduling Order, ECF No. 416, which extended various discovery and case deadlines, at the  
10 Parties' joint request;

11 WHEREAS, on October 9, 2025, the Court granted Plaintiffs' Motion to Extend Case  
12 Deadlines in part, ECF No. 435, extending the close of fact discovery to November 12, 2025, with  
13 the current expert discovery, dispositive motions, *Daubert* motions, and trial deadlines remaining  
14 the same, noting that the Court would not be inclined to grant a further extension of the fact  
15 discovery deadline;

16 WHEREAS, on November 1, 2025, the Court entered the Joint Stipulation and Order to  
17 Extend Case Deadlines and Take Depositions Out of Time, ECF No. 489, which set briefing  
18 deadlines for Motions for Summary Judgment and *Daubert* Motions and extended various deadlines  
19 for expert discovery, but did not affect any court-facing deadline or the trial date, at the Parties'  
20 joint request;

21 WHEREAS, per the Court's Standing Order Section IX, the Parties conferred and  
22 determined that they are filing cross-motions for summary judgment and, under that Standing Order,  
23 now submit this stipulation with a proposed order setting a briefing schedule for the cross-motions;

24 WHEREAS, per the Court's Standing Order, the Parties are limited to each filing one Motion  
25 for Summary Judgment and briefs are subject to the following page limits: Plaintiffs' opening brief  
26 and Defendant's opening/opposition brief must be 25 pages, Plaintiffs' opposition/reply brief must  
27 be 20 pages, and Defendant's reply brief must be 15 pages;

28

1 WHEREAS, to provide the Court with the most fulsome presentation of the issues and  
2 evidence and sufficiently address the various legal and factual aspects of the Parties' claims, the  
3 Parties have agreed, subject to the Court's approval, to request additional pages for their briefs;

4 WHEREAS, subject to the Court's approval, the Parties jointly request an additional ten (10)  
5 pages to the limits set forth in the Court's Standing Order for the Plaintiffs' opening brief and  
6 Defendant's opening/opposition brief as well as an additional five (5) pages to the limits set forth  
7 the Court's Standing Order for the Plaintiffs' opposition/reply brief and Defendant's reply brief,  
8 bringing the total page count to 35 pages for the opening briefs, 25 pages for Plaintiffs'  
9 opposition/reply, and 20 pages for Defendant's reply;

10 WHEREAS, the Parties acknowledge the impacts of additional pages on the Court's review,  
11 but respectfully request these additional pages to fully brief the relevant issues and effectively  
12 present the underlying record;

13 WHEREAS, the Parties also agree that the need to adjust the schedule to comply with the  
14 Court's Standing Order constitutes good cause to extend the current deadlines as outlined below,  
15 including to allow at least 28 days between the fourth brief and the hearing date, 12 weeks between  
16 that hearing date and the pretrial conference, and to account for certain trial conflicts of Anthropic's  
17 counsel (which Publishers have agreed to accommodate);

18 WHEREAS, Civil Local Rule 6-1(b) permits parties to file a stipulation seeking a court  
19 order modifying the Order's case deadlines;

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

22 NOW, THEREFORE, the Parties stipulate, subject to the Court's approval, that, pursuant to  
23 Civil Local Rule 7-12, the page limits as set forth in Court's Standing Order, be modified such that  
24 Plaintiffs' opening brief and Defendant's opening/opposition brief shall be limited to 35 pages,  
25 Plaintiffs' opposition/reply brief shall be limited to 25 pages, and Defendant's reply brief shall be  
26 limited to 20 pages. The Parties further stipulate, subject to the Court's approval, that the case  
27 deadlines specified by the Order are extended as reflected in the following table:  
28

Event	Previous Deadline	Proposed Deadline
Reply Expert Reports	February 13, 2026	February 13, 2026 (no change)
Depose All Expert Witnesses	March 9, 2026	March 9, 2026 (no change)
<i>Daubert</i> Motions	March 23, 2026	March 31, 2026
Oppositions to <i>Daubert</i> Motions	April 20, 2026	April 28, 2026
Replies in Support of <i>Daubert</i> Motions	May 11, 2026	May 19, 2026
Opening Summary Judgment Brief by Plaintiffs	March 23, 2026	March 23, 2026 (no change)
Opening Summary Judgment Brief/Opposition by Defendant	March 23, 2026/April 20, 2026	April 20, 2026
Opposition/Reply Brief in Support of Summary Judgment by Plaintiffs	April 20, 2026/May 11, 2026	May 18, 2026
Reply Brief in Support of Summary Judgment by Defendant	May 11, 2026	June 8, 2026
Hearing on Dispositive and/or <i>Daubert</i> Motions	June 10, 2026	July 8, 2026
Joint Pre-Trial Statement	August 11, 2026	October 21, 2026
Pre-Trial Conference	August 24, 2026	November 4, 2026 or as soon thereafter as convenient for the Court

Event	Previous Deadline	Proposed Deadline
Trial Date	September 28, 2026	December 7, 2026 or as soon thereafter as convenient for the Court

Date: February 13, 2026

/s/ Nicholas C. Hailey

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Respectfully Submitted,

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*Attorneys for Defendant*

**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.

Date: February 13, 2026

/s/ Sonal N. Mehta  
Sonal N. Mehta

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**~~PROPOSED~~ ORDER**

Pursuant to the Parties' Stipulation and Proposed Order to Extend Case Deadlines and Request to Exceed Applicable Page Limits, and for good cause, the Court hereby modifies the case schedule as follows.

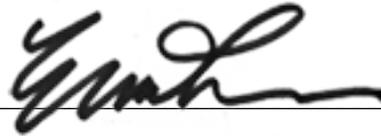
<b>Event</b>	<b>Previous Deadline</b>	<b>Proposed Deadline</b>
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Reply Brief in Support of Summary Judgment by Defendant	May 11, 2026	June 8, 2026
Hearing on Dispositive and/or <i>Daubert</i> Motions	June 10, 2026	<del>July 8, 2026</del> <b>July 15, 2026 at 10am</b>
Joint Pre-Trial Statement	August 11, 2026	<del>October 21, 2026</del> <b>October 28, 2026</b>

Event	Previous Deadline	Proposed Deadline
Pre-Trial Conference	August 24, 2026	<del>November 4, 2026</del> Thurs. Nov. 19, 2026 at 2:30pm
Trial Date	September 28, 2026	<del>December 7, 2026</del> January 25, 2027

Further, pursuant to the Parties’ stipulation, the page limits as set forth in Court’s Standing Order Section IX, are modified such that Plaintiffs’ opening brief and Defendant’s opening/opposition brief shall be limited to 35 pages, Plaintiffs’ opposition/reply brief shall be limited to 25 pages, and Defendant’s reply brief shall be limited to 20 pages.

**IT IS SO ORDERED.**

Dated: Feb. 26, 2026



THE HONORABLE EUMI K. LEE

United States District Judge

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