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8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**
10 **SAN FRANCISCO DIVISION**
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12 ANDREA BARTZ and KIRK WALLACE
13 JOHNSON, individually, and ANDREA BARTZ,
14 INC., CHARLES GRAEBER, and MJ + KJ, INC.,
individually and as representatives of the class,

15 Plaintiffs,

16 v.

17 ANTHROPIC PBC,

18 Defendant.
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Case No. 3:24-cv-05417-WHA

**JOINT STIPULATION AND ~~PROPOSED~~
ORDER REFERRING CLAIMANT DISPUTES
TO SPECIAL MASTER THEODORE K.
CHENG**

STIPULATION AND ~~[PROPOSED]~~ ORDER OF REFERENCE

Pursuant to Federal Rule of Civil Procedure 53, the Court appoints Theodore K. Cheng (“Theo Cheng”) as Special Master for settlement claims in this matter.

- a. In the event that Class Members dispute the ownership of a work or the portion of the settlement award for a work to which they are entitled—and in the event that dispute cannot be resolved by mutual agreement, as facilitated by the Settlement Administrator—these disputes will be addressed and resolved by Theo Cheng in his capacity as the Court-appointed, neutral Special Master.
- b. The Special Master shall serve until further order of the Court. The Special Master shall be compensated for time reasonably expended in connection with this matter at the rate of \$500 per hour and for any reasonably necessary out-of-pocket expenses. Plaintiffs will seek authorization from the Court for distribution of funds from the Settlement Fund for payment of fees and expenses for the claims administration services provided by the Special Master. If Class Counsel advance fees or costs to the Special Master that are reimbursed, and final approval is either not granted or (if appealed) overturned, Class Counsel will refund those amounts to the Settlement Fund.
- c. The Special Master will proceed with all reasonable diligence and will endeavor to quickly resolve all disputes based on the law.
- d. All decisions by the Special Master shall be final and binding without a right of appeal.

IT IS SO STIPULATED.

DATED: November 11, 2025

Respectfully submitted,

By: /s/ Rachel Geman

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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: November 11, 2025

/s/ Rachel Geman

As Attorney Cheng also declared his full qualifications, absence of conflict, and ability to do the work at \$500 per hour rather than \$1,000 (Dkt. No. 458), the parties' stipulated order of reference is **APPROVED AND ENTERED.**

IT IS SO ORDERED.

DATED: November 25, 2025.


HON. WILLIAM ALSUP