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

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

24 Plaintiffs,

25 v.

26 ANTHROPIC PBC,

27 Defendant.

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

) **JOINT NOTICE OF MOTION AND**  
) **MOTION RE: UPDATE ON SETTLEMENT**  
) **ADMINISTRATION AND ADDITIONS TO**  
) **SETTLEMENT WEBSITE**

**NOTICE OF MOTION AND MOTION**

**TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

**PLEASE TAKE NOTICE THAT** Class Counsel Lief Cabraser Heimann & Bernstein, LLP and Susman Godfrey L.L.P. (“Class Counsel”), alongside Defendant Anthropic PBC (“Anthropic”), hereby move the Court to approve three modifications to the Settlement Website. As explained in the accompanying joint stipulation requesting acceleration and the declaration of Justin Nelson submitted herewith, the Parties respectfully request that the Court grant the motion without a hearing on or before **March 5, 2026**. While the Parties notice this motion for a hearing at 2:00PM on April 16, 2026 in Courtroom 10—19th Floor of the Phillip Burton Federal Building at 450 Golden Gate Avenue San Francisco, CA 94102, the regular noticed hearing date would be too late to effectuate the relief sought herein.

This Motion is brought pursuant to the Court’s prior Order regarding Changes to Class Notice (Dkt. 453). The motion is based on this Notice of Motion and Motion, the Memorandum of Points and Authorities set forth below, the declaration of Rachel Geman and Rohit Nath, the declaration of Justin A. Nelson, the pleadings and records on file in this Action, and such other arguments the Court may consider.

**STATEMENT OF ISSUE TO BE DECIDED**

This Motion raises the following issue:

Whether the Court should approve the following proposed modifications to the Settlement Website: (i) the addition of two “FAQs” and their responses; (ii) the addition of one hyperlink to enable class members to sign up for “office hours” with the Class Counsel team; and (iii) the inclusion of information about a Webinar that Class Counsel will host about the Settlement, including a link to register for the Webinar.

Dated: March 2, 2026

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*Co-Lead Counsel*

1 **MEMORANDUM IN SUPPORT OF JOINT MOTION**

2 The Parties request that the Court permit Class Counsel to update the settlement website with the  
3 following additions (a) two new “FAQs” and their responses; (b) a hyperlink enabling class members to  
4 register for “office hours” with the Class Counsel team to address questions regarding the Settlement; and  
5 (c) registration links for informational Webinars conducted by Class Counsel regarding the claims process.

6 **I. Requested Additions to the Settlement Website**

7 The Parties request the Court’s permission to make the changes to the Settlement Website noted below.  
8 *See* Dkt. 453 (Court’s Order regarding Changes to Class Notice).

9 **a. “Office Hours”**

10 Over the past several months, Plaintiffs have been in constant contact with class members, many of  
11 whom have reached out with questions about claims submissions. Plaintiffs have dedicated teams of attorneys  
12 working directly with Class Members to answer their questions, explain to Class Members their rights, and  
13 help Class Members fill out settlement forms. To make it easier for Class Members to interface directly with  
14 attorneys on the Plaintiffs’ team, Class Counsel intends to set up a virtual “office hours,” where Class  
15 Members can sign up for available timeslots for a personal Zoom meeting with one of Class Counsel’s  
16 attorneys. Dkt. 548 at 8.

17 To ensure Class Members are aware of and can readily access this service, Class Counsel requests that  
18 the Court permit Class Counsel to add a registration link for ‘office hours’ to the front page of the Settlement  
19 Website under the “Contact Us” section. The registration link will display available timeslots and a sign-up  
20 form. Once registered, a Class Member will receive a confirmation email with Zoom information for their  
21 scheduled office hours session.

22 **b. Webinar Information**

23 Class Counsel intends to host at least one informational webinar that Class Members can attend to ask  
24 questions about the settlement and the claims process, including the impending reinclusion deadline and  
25 claims deadline. To ensure Class Members are aware of and can easily sign up for this service as well, Class  
26 Counsel request the Court permit Class Counsel to add registration links to the webinar(s) on the front page  
27 of the Settlement Website, as well as to provide basic information about the timing and content of the webinar.  
28 The language will be to the effect of: “**Upcoming Webinars.** Class Counsel are holding Webinars to answer

1 Class Member questions about the Settlement and claims process. This is entirely voluntary. Class Members  
2 are welcome but not required to email questions in advance to Class Counsel at rgeman@lchb.com or  
3 rmath@susmangodfrey.com. The webinars are presently scheduled for [to be completed] date and [to be  
4 completed] time. If you want to attend, please email Class Counsel to obtain the link.”

5 **c. Adding FAQs**

6 There are two questions that Class Counsel believe should be included on the “Frequently Asked  
7 Questions” section of the Settlement Website based on recurring questions about Unique IDs and ongoing  
8 confusion about the role of ClaimsHero. The present version of the FAQ portion of the settlement website is  
9 available here: Anthropic Copyright Settlement, <https://www.anthropiccopyrightsettlement.com/faq>.

10 **First Proposed FAQ: Unique IDs**

11 The first FAQ concerns the issuance of multiple “Unique IDs” to the same Class Member. The  
12 “Unique ID” is a 10-digit alphanumeric code that the Settlement Administrator created and sent to Class  
13 Members which, when input on the online Claim Form, pre-populates the Form with the Class Member’s  
14 information and list of eligible Works. In some situations, a Class Member received more than one Unique  
15 ID, including because the Class Member may have had (i) multiple variations of their name on the Works  
16 List, and thus received a Unique ID for each variant; or (ii) been identified as a potential claimant by another  
17 claimant, in which case the Class Member may have received another Unique ID as a result of the first  
18 claimant’s submission. Regardless of the number of Unique IDs they receive, all Class Members are  
19 encouraged to independently search for their Works on the Works List. Plaintiffs have received several  
20 questions from Class Members about the impact of multiple unique IDs and therefore propose adding an FAQ  
21 to the settlement website to address the issue. Class Counsel proposes the following:

22 FAQ 57: Why have I received multiple Unique IDs, and do I need to use one, some, or all of them to  
23 complete my Claim Form?

24 Answer: You are not required to include the Unique ID on your Claim Form.  
25 The only purpose of the Unique ID is to pre-populate your Claim Form to make  
26 it easier for you to submit your claim. No claim will be rejected for failure to  
27 include the Unique ID. You may have received multiple Unique IDs because,  
28 for example, there are variations as to the spelling of your name on the Works  
List or because you have been identified by other claimants as a potential  
claimant to a given work. We encourage you to carefully review the Works List  
yourself to ensure you are claiming all Works you are eligible for and are  
seeking to claim.

**Second Proposed FAQ: ClaimsHero**

The Second FAQ concerns ClaimsHero, the Arizona law firm that had been soliciting Class Members to opt out of the settlement. By at least as early as November 2025, ClaimsHero had begun an advertising campaign that primed Class Members to believe that that ClaimsHero would help them file claims in the Settlement when, in reality, Class Members that filled out ClaimsHero’s online forms were authorizing ClaimsHero to opt them out of the Settlement. Dkt. 442 at 6. This included a social media advertisement with a flashing button that said “Start Your Claim.” Class Counsel immediately filed for relief pursuant to Rule 23(d). Dkt. 442. During a November 13, 2025, hearing on Plaintiffs’ motion, the Court described ClaimsHero’s efforts as “a fraud of immense proportions,” “propaganda,” and an attempt to “trick[] the class.” Transcript of Nov. 13, 2025 Hearing (23:4, 28:3, 28:7–8). As a result of that hearing, the Court both ordered immediate changes to ClaimsHero’s marketing and required a follow-up evidentiary hearing on November 25, 2025. (Dkt. 504.) At the conclusion of the hearing, Judge Alsup reiterated that ClaimsHero was entitled to represent Class Members who choose to opt out of the Settlement, but the ClaimsHero’s initial advertising campaign “was committing a fraud on the class members.” Transcript of Nov. 25, 2025 Hearing (177:19–20).

Since then, ClaimsHero began a direct marketing campaign to Class Members, using the Works List to identify potential targets. ClaimsHero’s direct email solicitations identified class members by name, included their particular works on the Works list, and encouraged Class Members to contact them about a potential “AI Piracy” lawsuit. Nath/Geman Decl. ¶ 4.

Potentially due to the wealth of specific personal information in ClaimsHero’s solicitations, some Class Members who received the communications have been confused, believing that ClaimsHero has an official role in administering the Settlement. For example, one Class Member who recently contacted the Settlement Administrator said that he believed he had “filed a claim using ClaimsHero.” Nath/Geman Decl. ¶ 5. Another stated that her co-author had “opted in through ClaimsHero.” *Id.* A third observed that while “[o]ne of my works is included in this case, . . . I also received an email from ClaimsHero about something similar.” And a fourth wrote that he “received an email from an organization called claims hero and i am wondering what their status is in this claims process.” *Id.*

Class Counsel requests that the Court permit the inclusion of an FAQ that clarifies that ClaimsHero

1 has no role in the Settlement:

2 FAQ 58: I received an email from a firm called ClaimsHero. What role does ClaimsHero have in this  
3 Settlement?

4 Answer: None. ClaimsHero has no connection to Class Counsel and is not  
5 representing the Class. ClaimsHero is not authorized to file claims for Class  
6 Members.

7 You may nevertheless have been sent a direct email from ClaimsHero  
8 identifying you by name and identifying your works on the Works List.  
9 ClaimsHero will not help you file a claim in Settlement. Nor does any  
10 communication from ClaimsHero mean there is a problem with your claim.

11 If you have questions about a communication you received from ClaimsHero,  
12 please contact Class Counsel and we are happy to discuss it with you. FAQ 37  
13 contains the contact information for Class Counsel.

14 \*\*\*

15 We thank the Court for its attention to this matter and are happy to answer any questions that the  
16 Court may have.

17 Dated: March 2, 2026

18 By: /s/ Justin A. Nelson

19 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: March 2, 2026

/s/ Justin Nelson

Dated: March 2, 2026

Respectfully submitted,  
LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

By: /s/ Rachel Geman  
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