

Counsel Listed in Signature Blocks

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

GRADY HENDRIX & JENNIFER ROBERSON,
Individual and Representative Plaintiffs,

No. 4:25-cv-07558-YGR
No. 4:25-cv-08695-YGR
No. 4:25-cv-09090-YGR

V.

APPLE INC.,

Defendant.

**STIPULATION TO CONSOLIDATE CASES
AND SET BRIEFING SCHEDULE AND
{PROPOSED} ORDER; AS AMENDED BY
THE COURT**

Judge: Hon. Yvonne Gonzalez Rogers

SUSANA MARTINEZ-CONDE, STEPHEN L.
MACKNIK,

Individual and Representative Plaintiffs,

V.

APPLE INC.,

Defendant.

TASHA ALEXANDER, an Individual on Behalf of Herself and All Others Similarly Situated,

Plaintiff,

V.

APPLE INC., a California Corporation, CRAIG
FEDERIGHI, an individual, and
JOHN GIANNANDREA, an individual,

Defendants.

1 **STIPULATION**

2 Plaintiffs Grady Hendrix and Jennifer Roberson, in *Hendrix v. Apple Inc.*, No. 4:25-cv-07558
 3 (N.D. Cal.) (the “*Hendrix Action*”), Plaintiffs Susana Martinez-Conde and Stephen L. Macknik, in
 4 *Martinez-Conde v. Apple Inc.*, No. 4:25-cv-08695 (N.D. Cal.) (the “*Martinez-Conde Action*”),
 5 Plaintiff Tasha Alexander, in *Alexander v. Apple Inc.*, No. 4:25-cv-09090 (N.D. Cal.) (the “*Alexander*
 6 Action”), and Defendants Apple Inc., Craig Federighi, and John Giannandrea (collectively, the
 7 “Parties”) jointly request that the above-captioned actions (the “Actions”) be consolidated and that a
 8 joint case management statement and case management conference be scheduled as follows, subject
 9 to the Court’s approval.

10 1. Whereas, the *Hendrix Action* was filed on September 5, the *Martinez-Conde Action*
 11 on October 9, and the *Alexander Action* on October 22.

12 2. Whereas, the *Martinez-Conde* Plaintiffs filed an administrative motion to relate the
 13 *Hendrix* and *Martinez-Conde* actions. (Dkt. No. 33). The Court has granted that motion. Related Case
 14 Order (Dkt. No. 37).

15 3. Whereas, pursuant to Civil Local Rule 3-12(c), Judge Lee *sua sponte* referred the
 16 *Alexander* matter to this Court for consideration of whether the case is related to *Hendrix*. (Dkt. No.
 17 38.) Subsequently, the Parties filed a stipulated administrative motion to relate the *Alexander Action*
 18 to the *Hendrix* and *Martinez-Conde* Actions. Admin. Motion to Relate Cases (Dkt. No. 39).

19 4. Whereas, on November 5, the Court related the *Alexander Action* to the *Hendrix*
 20 Action. (Dkt. No. 40).

21 5. Whereas, consolidation of the three actions under Rule 42(a) is appropriate. As noted
 22 in the motions to relate, all three actions are for a single claim of direct copyright infringement that
 23 puts at issue the same alleged conduct—Apple’s alleged reproduction of books to train the same large
 24 language models. Consolidation will enable a single schedule for all three actions and prevent
 25 inefficient duplication of effort.

1 6. Whereas, the initial case management conference in the *Hendrix* action is currently set
 2 for December 15, 2025 at 2:00 pm, with the joint case management statement due by December 8,
 3 2025.

4 7. Whereas, the parties agree that the designation of Interim Class Counsel and the filing
 5 of a single operative consolidated complaint is necessary to ensure efficient case management.

6 NOW, THEREFORE, IT IS STIPULATED AND AGREED, subject to Court approval, as
 7 follows:

8 1. The Parties stipulate, subject to this Court's approval, that the three actions be
 9 consolidated.

10 2. Defendants' current deadlines to respond to the complaints in the three actions are held
 11 in abeyance.

12 3. The December 15, 2025 case management conference scheduled in the *Hendrix*
 13 Action, the January 26, 2026 case management conference scheduled in the *Martinez-Conde* Action,
 14 and any related deadlines are vacated.

15 4. The *Hendrix* Plaintiffs, the *Alexander* Plaintiff and the *Martinez-Conde* Plaintiffs
 16 propose that Plaintiffs' counsel will file their applications for appointment of leadership no later than
 17 November 21, 2025. The parties will file responses to these motions no later than December 5, 2025.

18 5. Within 14 days of their appointment, Interim Class Counsel shall designate or file and
 19 serve a consolidated class action complaint.

20 6. Defendants shall have 45 days after designation or filing by Interim Class Counsel of
 21 the consolidated complaint in which to answer, move to dismiss or otherwise respond.

22 7. If Defendants move to dismiss the consolidated complaint, plaintiff(s) shall respond to
 23 the motion(s) to dismiss 45 days thereafter, and Defendants shall file their reply brief(s) 30 days after
 24 that. All of the above may be revised with any schedule the Court deems appropriate.

25 8. Within 14 court days after all Defendants answer the consolidated complaint, the
 26 parties shall meet and confer and file with the Court a proposed case scheduling order, including a
 27 proposed case management conference.

1 RESPECTFULLY SUBMITTED this 13th day of November, 2025.

2 DATED this 14th day of November, 2025.

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17 *Attorneys for Defendants Apple Inc., Craig
Federighi, and John Giannandrea*18 **SIGNATURE ATTESTATION**19 I am the ECF User whose identification and password are being used to file **STIPULATION**20 **TO CONSOLIDATE CASES AND SET CONSOLIDATED CASE MANAGEMENT**21 **CONFERENCE AND [PROPOSED] ORDER.** Pursuant to Local Civil Rule 5-1(i)(3) regarding

22 signatures, I, Anne K. Davis, attest that the other signatories have concurred in the filing of the

23 document.

24 Dated: November 13, 2025

25 /s/ Anne K. Davis

26 Anne K. Davis

1 **[PROPOSED] ORDER GRANTING STIPULATION**

2 The parties' stipulation to consolidate cases and set a briefing schedule is hereby
 3 **GRANTED**. The parties are instructed that all future filings in the consolidated action are to occur
 4 on the docket in *Hendrix v. Apple Inc.*, Case No. 4:25-cv-07558-YGR.

5 Given the procedural posture, it is further **ORDERED** that *Martinez-Conde v. Apple Inc.*,
 6 Case No. 4:25-cv-08695-YGR (the "Martinez-Conde Action"), and *Alexander v. Apple Inc.*,
 7 Case No. 4:25-cv-09090-YGR (the "Alexander Action"), are administratively closed for
 8 statistical purposes only. Nothing further shall be filed on the dockets in the *Martinez-Conde*
 9 Action and the *Alexander* Action, and nothing contained in this order shall be construed as a
 10 dismissal or disposition of those Actions. Should further proceedings become necessary in the
 11 *Martinez-Conde* Action or the *Alexander* Action individually, any party may contact the Court to
 12 address the issue.

13 **IT IS SO ORDERED.**

14 Dated: November 14, 2025

15 
 16 Hon. Yvonne Gonzalez Rogers
 17 United States District Court Judge