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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

GRADY HENDRIX & JENNIFER ROBERSON,  
*Individual and Representative Plaintiffs,*

v.

APPLE INC.,

*Defendant.*

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

**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.*

## STIPULATION

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

RESPECTFULLY SUBMITTED this 13th day of November, 2025.

DATED this 14th day of November, 2025.

**COTCHETT, PITRE & MCCARTHY, LLP**

**KELLER ROHRBACK L.L.P.**

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By: /s/ Benjamin Gould

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**SIGNATURE ATTESTATION**

I am the ECF User whose identification and password are being used to file **STIPULATION TO CONSOLIDATE CASES AND SET CONSOLIDATED CASE MANAGEMENT CONFERENCE AND [PROPOSED] ORDER**. Pursuant to Local Civil Rule 5-1(i)(3) regarding signatures, I, Anne K. Davis, attest that the other signatories have concurred in the filing of the document.

Dated: November 13, 2025

/s/ Anne K. Davis

Anne K. Davis

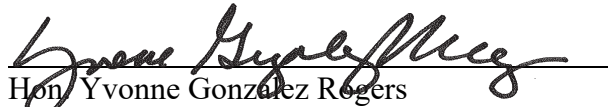
~~[PROPOSED]~~ ORDER GRANTING STIPULATION

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

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

**IT IS SO ORDERED.**

Dated: November 14, 2025

  
Hon. Yvonne Gonzalez Rogers  
United States District Court Judge