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*Counsel for Plaintiffs E. Molly Tanzer and
Jennifer Gilmore*

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

E. MOLLY TANZER, an individual; and
JENNIFER GILMORE, an individual.

Individual and Representative Plaintiffs,

v.

SALESFORCE, INC.,

Defendant.

Case No. 3:25-cv-08862-CRB

**JOINT STIPULATION IN SUPPORT OF
ADMINISTRATIVE MOTION TO
RELATE CASES UNDER CIVIL LOCAL
RULE 3-12: ORDER**

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

Plaintiff,

v.

SALESFORCE, INC.,

Defendant.

Case No. 5:25-cv-09560-VKD

Pursuant to Local Rule 3-12(a) and 7-11, Plaintiffs E. Molly Tanzer and Jennifer Gilmore, in *Tanzer, et al. v. Salesforce, Inc.*, No. 3:25-cv-08862-CRB (N.D. Cal.) (the “*Tanzer Action*”), and Plaintiff Tasha Alexander, in *Alexander v. Salesforce, Inc.*, No. 5:25-cv-09560-VKD (N.D. Cal.) (the “*Alexander Action*”) (collectively, the “Parties”) jointly request that the above-captioned actions (the “Actions”) be related. The Parties, by and through their undersigned counsel, stipulate and agree as follows:

WHEREAS, the Parties agree that the *Alexander Action* is related to the *Tanzer Action* pursuant to Civil Local Rule 3-12(a), which provides that an action is related to another when: “(1) The allegations concern substantially the same parties, property, transaction or event; and (2) It appears likely that there will be an unduly burdensome duplication of labor and expense or conflicting results if the cases are conducted before different Judges”;

WHEREAS, both of those requirements of L.R. 3-12(a) are satisfied. The *Alexander Action* and the *Tanzer Action* involve overlapping putative classes of copyright owners against Defendant Salesforce, Inc. Both actions are for a single claim of direct copyright infringement that puts at issue the same alleged conduct— Salesforce’s alleged reproduction of books to train the same large language models. As such, these actions concern substantially the same parties, property, and events;

WHEREAS, given the substantial overlap between the cases, proceeding before different Judges is likely to result in “an unduly burdensome duplication of labor and expense” and creates the possibility of “conflicting results”;

NOW THEREFORE, the Parties, through their undersigned counsel, hereby stipulate and agree that, subject to the approval of the Court:

1. The *Tanzer* and *Alexander* Actions are related pursuant to Civil Local Rule 3-12(a).

Dated: November 6, 2025

BLEICHMAR FONTI & AULD LLP

By: /s/ Lesley E. Weaver

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Counsel for Plaintiff Tasha Alexander

Dated: November 6, 2025

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*Counsel for Plaintiffs E. Molly Tanzer and Jennifer
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SIGNATURE ATTESTATION

I am the ECF User whose identification and password are being used to file the foregoing
JOINT STIPULATION IN SUPPORT OF ADMINISTRATIVE MOTION TO RELATE CASES
UNDER CIVIL LOCAL RULE 3-12. Pursuant to L.R. 5-1(i)(3) regarding signatures, I, Lesley E.
Weaver, attest that each of the other Signatories have concurred in the filing of the document.


Dated: November 6, 2025

/s/ Lesley E. Weaver
Lesley E. Weaver

~~PROPOSED~~ ORDER

PURSUANT TO THE FOREGOING STIPULATION, IT IS SO ORDERED.

Dated: November 18, 2025



Judge Charles R. Breyer
United States District Judge