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Counsel for Plaintiff Tasha Alexander

**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.

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

Plaintiff,

V.

SALESFORCE, INC.,

Defendant.

Joseph R. Saveri (SBN 130064)
Christopher K.L. Young (SBN 318371)
William W. Castillo Guardado (SBN 294159)
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Counsel for Plaintiffs E. Molly Tanzer and Jennifer Gilmore

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

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

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

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

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

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

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

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

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

25 Dated: November 6, 2025

BLEICHMAR FONTI & AULD LLP

26 By: /s/ Lesley E. Weaver

27 Lesley E. Weaver (SBN 191305)

Anne K. Davis (SBN 267090)

28 Joshua D. Samra (SBN 313050)

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21 *Counsel for Plaintiff Tasha Alexander*

22 Dated: November 6, 2025

23 **JOSEPH SAVERI LAW FIRM, LLP.**

24 By: /s/ Joseph R. Saveri
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Counsel for Plaintiffs E. Molly Tanzer and Jennifer
Gilmore

1 **SIGNATURE ATTESTATION**

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

6
7 Dated: November 6, 2025

/s/ Lesley E. Weaver

8 Lesley E. Weaver
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1 **[PROPOSED] ORDER**
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4 PURSUANT TO THE FOREGOING STIPULATION, IT IS SO ORDERED.
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7 Dated: November 18, 2025
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13 Judge Charles R. Breyer
14 United States District Judge
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