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8 *Attorneys for Individual and Representative Plaintiffs*
 9 *E. Molly Tanzer and Jennifer Gilmore*

10
11 UNITED STATES DISTRICT COURT
 12 **NORTHERN DISTRICT OF CALIFORNIA**
 13 **SAN FRANCISCO DIVISION**

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

Case No. 25-cv-08862-CRB

16 *Individual and Representative Plaintiffs,*
 17 v.
 18 SALESFORCE, INC.
 19 Defendant.

**STIPULATION REGARDING
 CONSOLIDATED COMPLAINT, ADR
 CERTIFICATION, AND CASE
 MANAGEMENT CONFERENCE;
 [PROPOSED] ORDER**

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

Case No. 25-cv-09560-CRB

23 Plaintiff,
 24 v.
 25 SALESFORCE, INC.
 26 Defendant.

27
 28 Case No. 25-cv-08862-CRB
 Case No. 25-cv-09560-CRB

**STIPULATION REGARDING CONSOLIDATED COMPLAINT, ADR CERTIFICATION, AND CASE MANAGEMENT
 CONFERENCE; [PROPOSED] ORDER**

STIPULATION

2 Pursuant to Rule 6-1(b) of the Local Rules of the United States District Court, Northern District of
3 California and Rule 42(a) of the Federal Rules of Civil Procedure, Plaintiffs E. Molly Tanzer and Jennifer
4 Gilmore, in *Tanzer, et al. v. Salesforce, Inc.*, No. 3:25-cv-08862-CRB (N.D. Cal.) (the “*Tanzer Action*”),
5 Plaintiff Tasha Alexander, in *Alexander v. Salesforce, Inc.*, No. 5:25-cv-09560-VKD (N.D. Cal.) (the
6 “*Alexander Action*”) (collectively, “Plaintiffs”), and Defendant Salesforce, Inc. (collectively, the
7 “Parties”), by and through their respective counsel of record, jointly request that the above-captioned
8 actions (the “Actions”) be consolidated, that the Plaintiffs be permitted to file a Consolidated Complaint
9 on or before January 20, 2026, and that certain case management deadlines be accordingly updated,
10 subject to the Court’s approval.

11 WHEREAS, the *Tanzer* Action was filed on October 15, 2025, and the *Alexander* Action was filed
12 on November 5, 2025; and

13 WHEREAS, on October 5, 2025, the Court issued an Order in the *Tanzer* Action setting an Initial
14 Case Management Conference and ADR deadlines. (Dkt. 5); and

15 WHEREAS, on November 6, 2025, the *Alexander* Plaintiffs filed an administrative motion to
16 relate the Actions pursuant to Civil Local Rule 3-12(a) and 7-11 (Dkt. 8), to which the *Tanzer* Plaintiffs
17 stipulated. (Dkt. 8-1); and

18 WHEREAS, on November 7, 2025, the Court issued an Order in the *Alexander* Action setting an
19 Initial Case Management Conference and ADR deadlines. (Dkt. 7); and

20 WHEREAS, on November 18, 2025, the Court ordered the *Alexander* Action related to the *Tanzer*
21 Action. (Dkt. 13); and

22 WHEREAS, no party has filed a responsive pleading or otherwise responded to a Complaint; and

23 WHEREAS, pursuant to Federal Rule of Civil Procedure 42(a), the consolidation of the Actions is
24 appropriate. As indicated in the motion to relate, the Actions are both for a single claim of direct copyright
25 infringement against Salesforce, Inc. and concern the same alleged conduct regarding alleged
26 unauthorized reproduction of books to train the same large language models. Accordingly, consolidation
27 will enable a single schedule for the Actions and prevent inefficient duplication of effort; and

1 WHEREAS, the current deadline for Salesforce, Inc. to respond to the Complaints in the *Tanzer*
 2 Action and the *Alexander* Action is January 20, 2026. (Dkt. 15); and

3 WHEREAS, the Parties agree that the filing of a single operative Consolidated Complaint and the
 4 adjustment of certain related case management deadlines are necessary to ensure efficient case
 5 management, to eliminate unnecessary duplication of efforts, and in the interests of justice.

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

7 1. The Parties stipulate, subject to the Court's approval, that the Actions be consolidated for all
 8 purposes pursuant to Federal Rule of Civil Procedure 42.

9 2. Defendant's current deadlines to respond to the Complaints in the *Tanzer* Action and the
 10 *Alexander* Action, respectively, are vacated.

11 3. Plaintiffs shall file a Consolidated Complaint due no later than January 20, 2026.

12 4. Defendant shall file a response to the Complaint no later than 30 days after the filing of the
 13 Consolidated Complaint.

14 5. If Defendant moves to dismiss the Consolidated Complaint, Plaintiffs shall respond to the
 15 motion to dismiss 45 days thereafter, and Defendant shall file their reply brief, if any, 30 days thereafter.

16 6. The Parties shall meet and confer pursuant to Federal Rule of Civil Procedure 26(f) on or
 17 before February 3, 2026.

18 7. The January 9, 2026 deadline in the *Tanzer* action and the February 3, 2026 deadline in the
 19 *Alexander* action for the Parties to make Initial Disclosures pursuant to Federal Rule of Civil Procedure
 20 26(a)(1) are vacated. The Parties shall make initial disclosures no later than February 17, 2026.

21 8. The Initial Case Management Conferences in the *Tanzer* and *Alexander* actions shall be
 22 vacated. The Initial Case Management Conference for the consolidated action shall be set for March 20,
 23 2026 at 8:30 a.m. and held by video conference. The deadline to file a Joint Case Management Statement
 24 shall be March 13, 2026.

25 9. The December 26, 2025 deadline in the *Tanzer* action and the January 20, 2026 deadline in
 26 the *Alexander* action to file an ADR Certification pursuant to Civil Local Rule 16-8(b) are vacated. The
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1 Parties will file an ADR Certification pursuant to Civil Local Rule 16-8(b) no later than 7 days prior to the
2 Case Management Conference.

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1 Dated: December 26, 2025

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2 By: /s/ Joseph R. Saveri

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16 *Counsel for Individual and Representative*
17 *Plaintiffs E. Molly Tanzer and Jennifer*
18 *Gilmore*

19 Dated: December 26, 2025

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Dated: December 26, 2025

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11 Dated: December 26, 2025

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20 *Counsel for Defendant Salesforce, Inc.*

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23 GOOD CAUSE APPEARING, IT IS SO ORDERED.

24 Dated: December 31, 2025

25 
26 Hon. Charles R. Breyer
27 United States District Judge