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26 **UNITED STATES DISTRICT COURT**  
27 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
28 **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

**ADMINISTRATIVE MOTION TO RELATE  
CASES UNDER CIVIL LOCAL RULE 3-12**

*(Caption continued on next page)*

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

3 Plaintiff,

4 v.

5 SALESFORCE, INC.,

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

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1 Pursuant to Local Rule 3-12(a) and 7-11, Plaintiff Tasha Alexander, in *Alexander v.*  
2 *Salesforce, Inc.*, No. 5:25-cv-09560 (N.D. Cal.) (filed November 5, 2025) (the “*Alexander*  
3 *Action*”), submits this administrative motion to consider whether the *Alexander Action* should be  
4 related to this first-filed, lowest-numbered case, *Tanzer, et al. v. Salesforce, Inc.*, No. 3:25-cv-  
5 08862-CRB (N.D. Cal.) (the “*Tanzer Action*”), filed in this district on October 15, 2025, now  
6 pending before this Court.

7 Counsel for Plaintiff Alexander have met and conferred with counsel for plaintiffs in the  
8 *Tanzer Action* (collectively, the “Parties”). The Parties agree that the *Alexander Action* should be  
9 related to the *Tanzer Action* and submit a Joint Stipulation in Support of Administrative Motion  
10 to Relate Cases Under Civil Local Rule 3-12 herewith.

11 Civil Local Rule 3-12(a) provides that an action is related to another when: “(1) The  
12 allegations concern substantially the same parties, property, transaction or event; and (2) It appears  
13 likely that there will be an unduly burdensome duplication of labor and expense or conflicting  
14 results if the cases are conducted before different Judges.” These criteria are met here. Both actions  
15 are for a single claim of direct copyright infringement that puts at issue the same alleged conduct—  
16 Salesforce’s alleged reproduction of books to train the same large language models. These actions  
17 concern substantially the same parties, property, and events.

18 Given that both actions concern the same defendant and involve the same conduct and  
19 claims, different Judges conducting parallel actions would be an undue burden and duplication of  
20 labor, expenses, and judicial resources, and could lead to potentially inconsistent results.  
21 Accordingly, relating the *Alexander Action* with the *Tanzer Action* will serve the interests of  
22 judicial economy and avoid the potential for conflicting results, consistent with Civil Local Rules  
23 3-12(a).

24 For the reasons set forth above, the Parties respectfully request that the Court relate the  
25 *Alexander Action*, Case No. 5:25-cv-09560 to the *Tanzer Action*, Case No. 3:25-cv-08862-CRB,  
26 pursuant to Local Rule 3-12(a).

Dated: November 6, 2025

**BLEICHMAR FONTI & AULD LLP**

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**SIGNATURE ATTESTATION**

I am the ECF User whose identification and password are being used to file the foregoing 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 the other Signatory has concurred in the filing of the document.

Dated: November 6, 2025

/s/ Lesley E. Weaver  
Lesley E. Weaver