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

ANDREA BARTZ, ANDREA BARTZ, INC.,) Case No.: 3:24-cv-05417-WHA
 CHARLES GRAEBER, KIRK WALLACE)

JOHNSON, and MJ + KJ, INC., individually) **NOTICE OF SETTLEMENT, JOINT**
 and on behalf of others similarly situated,) **STIPULATION FOR STAY, AND**
) **[PROPOSED] ORDER**

Plaintiffs,

v.

ANTHROPIC PBC,

Defendants.

Douglas A. Winthrop (Bar No. 183532)
 Joseph Farris (Bar No. 263405)
 Pieter de Ganon (Bar No. 320385)
 Jessica L. Gillotte (Bar No. 333517)
 Estayvaine Bragg (Bar No. 341400)
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Attorneys for Defendant Anthropic PBC

1 Pursuant to Civil Local Rules 7-12 and 6-2, Plaintiffs and Defendant Anthropic PBC (“Defendant” or
2 “Anthropic”) (collectively, the “Parties”), by and through their respective counsel of record, hereby stipulate
3 as follows:

4 **WHEREAS**, on August 19, 2025, the Parties attended an arms-length mediation with a third-party
5 neutral, the Hon. Layn Phillips, and have thereafter continued negotiations with the third-party neutral’s
6 assistance;

7 **WHEREAS**, the Parties have now reached a class-wide settlement memorialized in a binding term
8 sheet;

9 **WHEREAS**, staying discovery in this matter and vacating all existing deadlines and hearings will
10 preserve judicial resources and allow the Parties to focus their efforts on preparing all necessary documents
supporting settlement approval on an expedited basis;

11 **WHEREAS**, a stay will not prejudice any party and will serve the interests of judicial economy;

12 **WHEREAS**, the Parties anticipate they will finalize and execute a full-form settlement agreement on
13 or before September 3, 2025;

14 **WHEREAS**, Plaintiffs anticipate filing a motion for preliminary settlement approval by September 5,
2025, and anticipate requesting a hearing on that motion during the week of September 8, 2025; and

15 **WHEREAS**, the Parties are available to address scheduling of a preliminary approval hearing on
16 August 28, 2025, if the Court desires.

17 **NOW, THEREFORE**, the Parties stipulate and agree as follows:

18 The Parties jointly request a stay of all fact and expert discovery deadlines and, further that all motions
19 pending before the Court be taken off calendar.

20 **IT IS SO STIPULATED**, through Counsel of Record.
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Dated: August 26, 2025

Respectfully submitted,

By: /s/ Justin A. Nelson

By: /s/ Douglas A. Winthrop

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1 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

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4 DATED: _____

5 The Honorable William H. Alsup
6 United States District Court Judge
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