

LATHAM & WATKINS LLP
Andrew M. Gass (Bar No. 259694)
andrew.gass@lw.com
Joseph R. Wetzel (Bar No. 238008)
joe.wetzel@lw.com
505 Montgomery Street, Suite 2000
San Francisco, California 94111-6538
Telephone: (415) 391-0600

Allison L. Stillman (*pro hac vice*)
alli.stillman@lw.com
1271 Avenue of the Americas
New York, NY 10020
Telephone: (212) 906-1200

*Attorneys for Defendants Internet Archive, Brewster
Kahle, Kahle/Austin Foundation, George Blood,
and George Blood L.P.*

(Additional counsel listed on signature pages)

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UMG RECORDINGS, INC, CAPITOL
RECORDS, LLC, CONCORD BICYCLE
ASSETS, LLC, CMGI RECORDED MUSIC
ASSETS LLC, SONY MUSIC
ENTERTAINMENT, and ARISTA MUSIC

Plaintiff(s),

vs.

INTERNET ARCHIVE, BREWSTER,
KAHLE, KAHLE/AUSTIN FOUNDATION,
GEORGE BLOOD, and GEORGE BLOOD,
L.P.

Defendant(s).

Case No. 3:23-cv-06522-MMC

**JOINT STATUS REPORT REGARDING
SETTLEMENT NEGOTIATIONS**

Pursuant to the Court's September 2, 2025, Order (ECF No. 178), Defendants Internet Archive, Brewster Kahle, the Kahle/Austin Foundation, George Blood, and George Blood L.P. (collectively, "Defendants") and Plaintiffs UMG Recordings, Inc., Capitol Records, LLC, Concord Bicycle Assets, LLC, CMGI Recorded Music Assets LLC, Sony Music Entertainment, and Arista Music (collectively, "Plaintiffs") (Plaintiffs and Defendants shall collectively be referred to as the "Parties"), jointly write to provide the Court with an update regarding the progress of their settlement negotiations.

The Parties have reached an agreement and are in the process of obtaining final approval and signatures from the various Parties. As of today, all Parties have approved and signed the settlement agreement, other than Brewster Kahle and the Internet Archive.

Dated: September 12, 2025

Respectfully submitted,

LATHAM & WATKINS LLP

/s/ Andrew M. Gass

Andrew M. Gass (Bar No. 259694)

andrew.gass@lw.com

Joseph R. Wetzel (Bar No. 238008)

joe.wetzel@lw.com

LATHAM & WATKINS LLP

505 Montgomery Street, Suite 2000

San Francisco, CA 94111

(415) 391-0600

Allison L. Stillman (*pro hac vice*)

alli.stillman@lw.com

1271 Avenue of the Americas

New York, NY 10020

(212) 906-1200

Brent Murphy (*pro hac vice*)

brent.murphy@lw.com

555 Eleventh Street NW, Suite 1000

Washington, DC 20004

(202) 637-2201

*Attorneys for Defendants Internet Archive,
Brewster Kahle, Kahle/Austin Foundation,
George Blood, and George Blood L.P.*

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

OPPENHEIM + ZEBRAK LLP

/s/ Matthew J. Oppenheim
Matthew J. Oppenheim (*pro hac vice*)
matt@oandzlaw.com
Corey Miller (*pro hac vice*)
corey@oandzlaw.com
Danae Tinelli (*pro hac vice*)
danae@oandzlaw.com
4530 Wisconsin Avenue NW, 5th Floor
Washington, DC 20016
Telephone: (202) 480-2999

Noel M. Cook (Bar No. 122777)
ncook@hansonbridgett.com
HANSON BRIDGETT LLP
425 Market Street, 26th Floor
San Francisco, California 94105
Telephone: (415) 777-3200

Jacob L. Tracer (*pro hac vice*)
jtracer@riaa.com
RECORDING INDUSTRY ASSOCIATION
OF AMERICA
1000 F St. NW, 2nd Floor
Washington, DC 20004-1512
Telephone: (202) 857-9611

*Attorneys for Plaintiffs UMG Recordings, Inc.,
Capitol Records, LLC, Concord Bicycle Assets,
LLC, CMGI Recorded Music Assets LLC, Sony
Music Entertainment, and Arista Music*

SIGNATURE ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from each of the signatories hereto.

Dated: September 12, 2025

/s/ Andrew M. Gass

Andrew M. Gass